COLLINS, MESEREAU, REDDOCK & YU Thomas A. Mesereau, Jr., State Bar Number 091182 Susan C. Yu, State Bar Number 195640 1875 Century Park East, 7th Floor SUPERIOR COURT OF CALIFORNIA COUNTY OF SANTA BARBARA Los Angeles, CA 90067 3 Tel.: (310) 284-3120, Fax: (310) 284-3133 JUL 2 6 2004 4 KATTEN MUCHIN ZAVIS ROSENMAN GARY M. BLAIR, Executive Officer Steve Cochran, State Bar Number 105541 5 Carried Wagner Stacey McKec Knight, State Bar Number 181027 CARRIE L. WAGNER, Deputy Clork 2029 Century Park East. Suite 2600 6 Los Angeles, California 90067-3012 Tel.: (310) 788-4455, Fax: (310) 712-8455 7 SANGER & SWYSEN Robert M. Sanger, State Bar Number 058214 233 East Carrillo Street, Suite C Santa Barbara, CA 93101 Furnialed

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court order Tel.: (805) 962-4887, Fax: (805) 963-7311 10 OXMAN & JAROSCAK 11 Brian Oxman, State Bar Number 072172 14126 East Rosecrans Santa Fe Springs, CA 90670 Tel.: (562) 921-5058, Fax: (562) 921-2298 13 Attorneys for Defendant MICHAEL JOSEPH JACKSON 15 SUPERIOR COURT OF THE STATE OF CALIFORNIA 15 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION 17 18 Case No. 1133603 THE PEOPLE OF THE STATE OF CALIFORNIA. 19 OPPOSITION TO PLAINTIFF'S MOTION Plaintiffs. TO QUASH SUBPOENAS ISSUED TO 20 JANET VENTURA, WILLIAM 21 DICKERMAN AND STAN KATZ: VS. MEMORANDUM OF POINTS AND 22 AUTHORITIES; DECLARATIONS OF MICHAEL JOSEPH JACKSON. ROBERT M. SANGER, TIFFANY PAVELIC AND MICHAEL VOLARICH 23 Defendant. UNDER SEAK 24 25 Honorable Rodney Melville 25 Date: July 27, 2004 Time: 8:30 am. 27 Dept: SM 2 28

MEMORANDUM OF POINTS AND AUTHORITIES

1.

THE COURT HAS THE INHERENT POWER TO HOLD HEARINGS AND ISSUE ORDERS REGARDING PROPERTY SEIZED FROM A CRIMINAL SUSPECT PURSUANT TO A SEARCH WARRANT

A. The Court Should Strike the Opposition for the District Attorney and Grant Mr.

Jackson's Motion to Suppress.

The District Attorney opposed Mr. Jackson's Motion to Suppress with an Opposition that is not supported by a factual declaration regarding the knowledge or imputed knowledge of the District Attorney or law enforcement on the critical issue before the Court. In the Opposition, they say, "[i]t was not known that Mr. Miller was employed by a lawyer retained by defendant when the search was initiated." (Plaintiff's Opposition at 2:18-20.) However, there is no declaration or other factual basis submitted to support this bald statement of purported fact. Therefore, without a declaration, the bald allegation is of no legal effect

Mr. Jackson, on the other hand, submitted a declaration asserting the factual basis for the assertion that the District Attorney and law enforcement did know or reasonably should have known that Mr. Miller was a private investigator working for Mr. Jackson's attorney, Mark Geragos. That declaration has not been opposed by any other declaration or offer of proof.

If there were to be no evidentiary hearing, Mr. Jackson would therefore prevail on the papers filed. The Court would properly conclude that the District Attorney and law enforcement knew or reasonable should have known of the relationship between Mr. Miller and Mr. Jackson's defense.

B. Evidence Code Sections 402 and 405 Authorize the Court to Hold a Hearing to

Determine a Preliminary Fact in Dispute.

OPPOSITION TO PLAINTIFF'S MOTION TO QUASH SUBPOENAS ISSUED TO JANET VENTURA, WILLIAM DICKERMAN AND STAN KATZ

¹ Furthermore, in open Court on July 9, 2004, the District Attorney, Tom Sneddon, specifically told the Court that the factual allegation in the Opposition was not correct. It was unclear as to exactly what he maintained the correct statement of fact to be and he said he was willing to testify at a future hearing to his knowledge.

If the Court finds that factual dispute exists in this motion because the prosecution has denied, without a supporting declaration, that the District Attorney knew at the time of the search that Bradley Miller was an investigator hired by Mr. Jackson's's attorney, Mark Geragos, then it should hold a hearing pursuant to Evidence Code Section 402 and 405. Those sections require that the Court determine the preliminary fact in dispute. If the Court is not inclined to determine the issue by striking the prosecution's Opposition, then it is proper to proceed to an evidentiary hearing on the preliminary fact.

The Court Hus The Power to Conduct Proceedings and Suppress Seized Property

Based on a Motion Made on Sixth Amendment Grounds.

The District Attorney asserts that "[t]here are no "non-statutory" grounds for suppressing evidence in a criminal case." (Plaintiff's Motion to Quash, 8:16-17.) This is simply false. In People v. Supertor Court (Laff) (2001) 25 Cal. 4th 703, the Supreme Court of California held (emphasis added):

Law enforcement officials who seize property pursuant to a warrant issued by the court do so on behalf of the court, which has authority pursuant to Penal Code Section 1536 to control the disposition of the property. (People v. Superior Court (1972) 28 Cal.App. 3d 600, 607-608 [104 Cal. Rptr. 876.].) This authority also arises from the court's inherent power to control and prevent the abuse of its process. (Id. at p. 607; Ensonia Corp. v. Superior Court (1998) 65 Cal.App. 4th 1537, 1547 [77 Cal. Rptr. 2d 507].) Thus, even in the absence of statutory authorization, the superior court possesses the inherent power to conduct proceedings and issue orders regarding property selzed from a criminal suspect pursuant to a warrant issued by the court.

While the actions taken by the government in the present case are much more egregious than the actions of the government in Laff, where the issue was whether seized materials were privileged, rather than an invasion of the defense function, the holding of Laff is applicable here.

It is a non-sequitur to suggest that this Court does not have the authority to suppress the materials seized from Brad Miller's office on the grounds that Mr. Jackson's Sixth and Fourteenth Amendment rights were violated, but that it does have the authority to dismiss the case on those same grounds. Dismissal may be the only relief that is adequate to address the government's unconstitutional intrusion into the defense function, however, in the interim, the

government must not be allowed to benefit from the fruits of this illegal intrusion.

Ц.

THE ISSUE OF WHETHER JULY 27, 2004 IS AN INCONVENIENT DATE FOR THE WITNESSES IS MOOT

It is understandable that certain witnesses may be unable to testify on July 27, 2004, due to religious observances, vacation plans or pregnancy.² However, the Court has continued the hearing until August 16, 2004, and the issues regarding that date are now moot. These witnesses should remain under court order to appear on August 16, 2004. To the extent that any witness needs a continuance beyond August 16, 2004, that witness can make a showing, presumably through their own counsel. Inconvenience, however, that is not a ground to quash the subpoena it is only grounds for continuance or other arrangements within the discretion of the Court.

III.

THE WITNESSES WERE PROPERLY SUBPOENAED PURSUANT TO PENAL CODE SECTION 1330

A. The Witnesses Reside Within 150 Miles of the Courthouse.

The witnesses reside well within the 150 mile limit of Penal Code Section 1330. The Court can take judicial notice that the address of the witnesses are within a 150 mile radius of the Santa Meria Courthouse. In addition, the use of a ruler and a commercially available map show that the distance is approximately 120 miles. (Declaration of Robert M. Sanger at ¶ 4.) This comports with the plain language of the statute.

Penal Code Section 1330 states "[n]o person is obliged to attend as a witness before a court or magistrate out of the county where the witness resides, or is served with the subpoena.

The fact that it may be inconvenient for certain witnesses to testify on a particular day or the issue of whether the witnesses reside within 150 miles of the courthouse are matters to be raised by the witnesses, not the District Attorney of Santa Barbara County. At least two, and probably all, of these witnesses have counsel, and at least one of them is an attorney himself. The District Attorney does not have standing to advocate on matters of convenience or distance from the courthouse. The District Attorney should be interested in seeing this matter fully examined by the Court and should not take a position on behalf of a witness subpoensed by Mr. Jackson simply for the purpose of interfering with the defense of his case.

unless the distance be less than 150 miles from his or her place of residence to the place of trial."

There is no mention of driving distance. The plain language does not allow for an interpretation that the statute is concerned with anything other than actual mileage which is represented by a 150 mile radius from the Courthouse..

The prosecution provides this Court with no authority that permits "driving distance" as opposed to "map radius distance" and it does not appear that there is any such authority in light of the plain language of the statute. Federal authority supports the same conclusion. In Deloro Smelting & Refining Co. v. Engelhard Minerals & Chemicals Corp. 313 F. Supp. 470, 474 (N.D. Cal. 1970), the court state the 100 mile limitation that permits service of summons outside the state is measured "as the crow flies" rather than by road miles. (1 W. Schwartzner, W. Tashima & J. Wagstaff, Cal. Practice Guide, Federal Civil Procedure Before Trial, sec. 5:24.18 (2003).)

The Witnesses Do Not Reside More Than 150 Miles Away From the Courthouse

Even By Highway.

The prosecution states that Janet Arvizo resides 151.39 miles form the court (Plaintiff's Motion to Quash, 12:4-6), and Attorney Dickerman resides 154.72 miles form the court (Plaintiff's Motion to Quash, 11:26-12:3.) However, the prosecution has chosen to use an online calculator. Map Quest, without providing a foundation for the information. It turns out, that the prosecution used the procedure for calculating distance by requesting the "quickest route" rather than the "shortest route."

Using the shortest route, even by highway mileage, the witnesses reside within 150 miles of the courthouse. The "shortest route" distance from Janet Arvizo's residence to the Santa Maria Court House is 148.6 miles driving distance and the driving distance between Attorney Dickerman and the Santa Maria Court House is 149.3 miles. (Declaration of Robert M. Sanger at

The purpose of the 150 milage limitations in discovery statutes was to conform to the Legislature's view of the "long-established practice of limiting the territorial scope of the powers of a court to compel the attendance of witnesses." Twin Lock, Inc. v. Superior Court, 52 Cal. 2d 754, 759 (1959) (limitation of miles for witnesses to attend court is a territorial limitation of a subpoenaing party's power and a limitation on the court's powers, not a travel restriction). The limitation is territorial in nature, not a driving milage restriction.

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C. If for Some Reason, the Court Finds it Necessary to Endorse the Subpoenas, Good Cause Appears.

Mr. Jackson has demonstrated good cause to show that he believes that the evidence of the witnesses is material and that the attendance of the witnesses at the hearing is material and necessary. (Declaration of Robert M. Sanger at ¶ 2.)

JV.

THE SUBPOENAS WERE PROPERLY SERVED

The attached declarations of Michael Volarich and Tiffany Pavelic demonstrate proper service on Janet Arvizo and William Dickerman. Furthermore, the witnesses, through the office of the District Attorney, agreed to appear on August 16, 2004, in order to avoid being required to appear on July 27, 2004.

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Attorney Dickerman has refused to inform the court of his residence. The burden of proving where a witness resides is on the witness and is a factual question for the court. In re Morelli, 11 Cal. App. 3d 819, 831 (1970). The only address disclosed by Attorney Dickerman is his office located at 11355 W. Olympic Blvd., Los Angeles, CA 90064. The court should take judicial notice that most areas postal zone 90034 where Attorney Dickerman claims he resides are well within the 150 miles driving distance from the court.

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CONCLUSION

For all of the foregoing reasons, the government's request to quash the subpoenss should be denied and the Court should either strike the prosecution's Opposition to the Motion to Suppress or conduct an evidentiary hearing into the preliminary facts pursuant to Evidence Code Sections 402 and 405.

Des le Leie 26 2004

Dated: July 26, 2004

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Respectfully submitted,

COLLINS, MESEREAU, REDDOCK & YU
Thomas A. Mesereau, Jr.
Susan C. Yu

KATTEN MUCHIN ZAVIS ROSENMAN Steve Cochran Stacey McKee Knight

SANGER & SWYSEN Robert M. Sanger

OXMAN & JAROSCAK

Robert M. Sanger

Attorneys for

MICHAEL JOE JACKSON

I. Robert M. Sanger, declare:

- 1. I am an attorney at law duly licensed to practice law in the courts of the State of
 California, a partner in the law firm of Sanger & Swysen, and co-counsel for Michael
 Jackson.
- I believe that the evidence that will be provided by Janet Arvizo and William Dickerman is material to the issues of the knowledge or imputed knowledge of the District Attorney and law enforcement at or before the time that the search warrant for Brad Miller's office was executed, and that the attendance of these witnesses at the hearing on that issue is material and necessary.
- The residence of Janet Arvizo and the office of William Dickennan are within 150 miles of the Santa Maria courthouse. While the fastest driving time route to the courthouse may be a distance of more than 150 miles, the shortest driving route is less than 150 miles from the courthouse. Using www.mapsonus.com, I calculated the shortest highway route between Janet Arvizo's residence and the courthouse is 148.6 miles. The shortest highway distance between William Dickerman's office is 149.3 miles. Printouts of these calculations are attached to this Declaration.
- 4. Using a map of California and a ruler, I calculated that Santa Maria Courthouse is approximately 120 miles from West Los Angeles.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct this 26th day of July, 2004, at Santa Barbara, California.

Robert M. Sanger



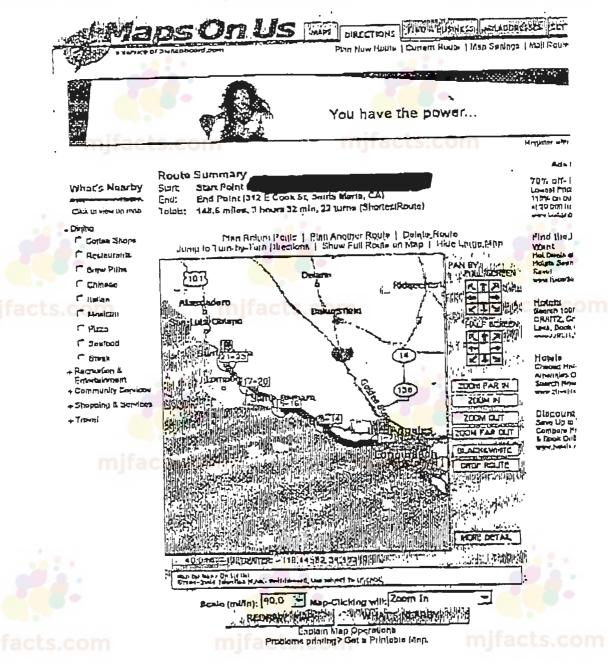




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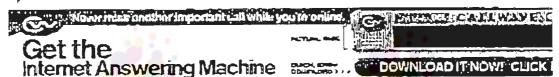


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27 28 DECLARATION OF MICHAEL VOLARICH

I, Michael Volarich, declare and say:

- 1. I am an employee of Loffredo & Volarich, Investigative Specialists, located at 141 South Lake Avenue, Suite 140, Pasadena, California 91101. I have been so employed since 1981.
- 2. On Saturday, July 17, 2004, I was contacted by Bill Pavelic and retained to effect service of a witness subpoens in the matter of The People of the State of California vs. Michael Joseph Jackson, Santa Barbara County Superior Court Case # 1133603. A copy of the subpoctoa I was asked to serve is attached as Exhibit "A." The named witness was identified as being Janet Arvizo aka Janet Jackson with a residence address of Los Angeles, California 90025. She was described as being a female Caucasian in her late 30's. short and eight months pregnant and has brown hair.
- 3. Rush service was requested with special instructions to attempt service on Sunday. July 18, 2004, using two agents and to video the process if deemed feasible and to use extreme caution to avoid startling the witness out of concern for her pregnant condition. Joseph Volarich (licensed LA County Process Server - #4715) and I arrived at the aforementioned location on Sunday, July 18, 2004, at 2:50 p.m. and found it to be a three story, 15 unit fully secured apartment building with locked front doors and locked underground parking stalls. At approximately 3:05 p.m., we spoke to an unidentified male tenant of the building as he unlocked the door and asked for permission to enter as we were there to serve a subpoens.
- 4. The tenant let us in and he walked down the hall as we waited for the elevator. We took the elevator to the second floor and found apartment 201 at the west end of the hall way. Due to the physical layout, it was decided not to video the process service out of privacy concerns. When I first knocked on the door of spartment 201, no one answered but the sound of a television could be heard.
- 5. A second and louder knock on the door proved successful as someone (sounded like a young male) responded asking what we wanted. When I asked for Janet, a voice could be heard



young male) responded asking what we wanted. When I asked for Janet, a voice could be heard calling out, "Janet, it's for you," and seconds later the door was cracked open about 6-8". A female Caucasian fitting the description of the witness asked what we wanted.

- 6. After informing her that we were there to serve a witness subported on lanet Jackson she hasitated for a couple of seconds before stating that we were at the wrong place and she did not know anyone by that name. After very diplomatically explaining that we were of the belief that we were at the right address and that she was in fact Janet Arvizo aka Janet Jackson, Joseph Volarich handed her the witness subported (at 3:10 p.m.) which she accepted. While she looked over the subported, I advised her that if she had any questions or concerns she should contact the attorney that issued the subported or to contact her own attorney.
- 7. She then closed the door and we departed. Immediately after leaving the building and while walking across the street we heard the sound of someone yelling out from the witness's second story balcony something to the effect of, "liar or lying." It appeared to be a young boy approximately 13 or so years old. He was screaming other words we could not make out. We departed without making any comments and immediately called Bill Pavelic with a status report. He instructed us to meet with him. Shortly thereafter, we met with Bill Pavelic, and after reviewing a photograph of the named witness, I was satisfied that service had been effected on the named witness, Janet Arvizo. Joseph Volarich then executed a Proof of Service, a copy of which is attached as Exhibit "B."

I declare under penalty of penjury under the laws of the State of California the foregoing is true and correct.

Executed this 26th day of July, 2004, at Pasadena, California.

Michael Volarich,

Michael Vola

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I. Tiffany Pavelic, declare and say:

- 1. I am employed for at 1351 Cedar Court, Glendale, California 91207. I am a registered process service for the State of California, license number 4961.
- 2. On Friday, July 16, 2004. I went to the offices of William Dickerman located at 11355 West Olympic Boulevard, Suite 100, Los Angeles, California 90064, for the purpose of serving a subpoena. I was accompanied by my mother, Marija Pavelic. A copy of the document I took with me is attached as Exhibit "A." We arrived at the location at approximately 11:35 a.m.
- 3. Upon arriving, I spoke with the main receptionist. Her name was Julic Padilla. I asked for Mr. Dickerman, and she called his office telephone extension. She spoke to him and informed me that he was on the telephone. I waited for a few minutes, and then asked Ms. Padilla to call him again. She did so, and while on the telephone, she asked me what the reason was for which I wished to see Mr. Dickerman.
- 4. I informed Ms. Padilla I was there to serve a subpoena. After repeating this information to Mr. Dickerman concerning my purpose, Ms. Padilla told me it would be a few minutes before I could see him. I waited for approximately five (5) minutes, and a woman named Elaine Cook came into the reception room. She told me she was Mr. Dickerman's secretary and that Mr. Dickerman was out to lunch. She stated that it was in reality her who was on the telephone talking to Ms. Padilla.
- 5. I was shocked that Ms. Padilla would have mistaken Ms. Cook for Mr. Dickerman. I was shocked that the male voice that I could hear on the telephone turned out to be Ms. Cook. I knew instantly I was being told a fabrication.
- 6. My mother and I walked outside to call my employer. My employer instructed me to take a picture of the receptionist in order to establish that I had attempted service. When my mother and I walked back into the lobby, there was a man standing by Ms. Padilla. I approached him, and he said: "You got me."

- 7. My mother asked the man if he was Mr. Dickerman. He stated "Well, maybe." Then he thought about it for a while and he said, "Well sure." I handed the man the subpoent, and he took it into his hand. I then took a photograph of Mr. Dickerman holding the subpoent, but the photo does not show the actual subpoent that he is reading. We then departed.
- 8. On July 19, 2004, at approximately 2:20 p.m., my mother and I returned to Mr. Dickerman's office to serve a Subpoena Duces Tecum. A copy of the document is attached as Exhibit "B." We went into the lobby area of Mr. Dickerman's office, spoke to Ms. Padilla, and asked for Mr. Dickerman.
- 9. Ms. Padilla asked me to wait for a moment, and then dialed Mr. Dickerman's telephone number. She stated to the person who answered: "Tiffany is here with a subpoena."

 After speaking to the person who answered the telephone, Ms. Padilla asked me to wait and someone will be right with you.
- 10. Within two (2) minutes, Ms. Cook appeared in the lobby. She stated: "Mr. Dickerman is in court right now, and he will not be in the office today." I asked her if she would accept service of the subpoena and give it to Mr. Dickerman. Ms. Cook asked what it was I wanted to serve. My mother, Marija, said it was a copy of a Subpoena. I then asked Ms. Cook if she would accept service of the subpoena on behalf of Mr. Dickerman. Ms. Cook stated: "Yes I will. I will give it to Mr. Dickerman." I handed the document to Ms. Cook at approximately 2:25 p.m., thanked her, and departed.

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct.

Executed this 27th day of July, 2004, at Gleadale, California.

Tiffany Pavolic

SHORT TITLE:		CASE HIMEOR
People v. Michael Jeaph Jackso	ls.com	1133603
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PROOF OF SERVICE

I, the undersigned declare:

I am over the age of 18 years and not a party to the within action. I am employed in the County of Santa Barbara. My business address is 233 East Carrillo Street, Suite C, Santa Barbara, California, 93101.

On July 26, 2004, I served the foregoing document OPPOSITION TO PLAINTIFF'S MOTION TO QUASH SUBPOENAS ISSUED TO JANET VENTURA, WILLIAM DICKERMAN AND STAN KATZ; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATIONS OF ROBERT M. SANGER, NICOLE PAVELIC, TIFFANY PAVELIC, AND MICHAEL VOLARICH on the interested parties in this action by depositing a true copy thereof as follows:

Tom Sneddon
Gerald Franklin
Ron Zonen
Gordon Auchineloss
District Attorney
1105 Sunta Barbara Street
Santa Barbara, CA 93101
568-2398

- BY U.S. MAIL I am readily familiar with the firm's practice for collection of mail and processing of correspondence for mailing with the United States Postal Service. Such correspondence is deposited daily with the United States Postal Service in a scaled envelope with postage thereon fully prepaid and deposited during the ordinary course of business. Service made pursuant to this paragraph, upon motion of a party, shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit.
- BY FACSIMILE -I caused the above-referenced document(s) to be transmitted via facsimile to the interested parties at
- BY HAND I caused the document to be hand delivered to the interested parties at the address above.
- STATE I declure under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed July 26, 2004, at Santa Barbara, California.

Carol Dowling

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