STEPHEN SHANE STARK, COUNTY COUNSEL 1 STEPHEN D. UNDERWOOD, CHIEF ASSISTANT (sbn 063057) COUNTY OF SANTA BARBARA 2 105 E. Anapamu St., Suite 201 Santa Barbara, CA 93101 3 (805) 568-2950 / FAX: (805) 568-2982 AUS 1 2 2004 Attorneys for Jim Anderson, Sheriff, 5 County of Santa Barbara GARY M. ELAIR, Executive Officer Carried Wagner CARRIE L. WAGNER, Dibuty Clerk б SUPERIOR COURT OF THE STATE OF CALIFORNIA 7 FOR THE COUNTY OF SANTA BARBARA 8 (COOK DIVISION) 9 10 Case No: 1133603 PEOPLE OF THE STATE OF 11 CALIFORNIA, 12 NOTICE OF MOTION AND PlaintIffs, MOTION OF JIM ANDERSON, 13 SANTA BARBARA COUNTY SHERIFF, FOR AUTHORIZATION 14 15 16 17 18 19 Date: August 19, 2004 VS. Time: 8:30 a.m. 20 MICHAEL JOE JACKSON, Dept: SM 28 21 Defendant. FILED UNDER SEXT = PROPOSET **REDACTED VERSION** 22 23 Assigned Judge: Hon. Rodney S. Melville 24 25 PLEASE TAKE NOTICE that on August 19, 2004, at 8:30 a.m., or as soon 26 thereafter as the matter can be heard, in Department SM-2 of this Court, located at T COUNSEL of Spels Barbare

312 E. Cook St., Santa Maria, Jim Anderson, Sheriff, County of Santa Barbara will

PRINCED REDACTED MOTION

Angewell Street

28

The following excerpt is taken directly from the "60 Minutes" interview conducted by CBS' Ed Bradley.

ED BRADLEY: What happened when they arrested you? What did they do to you? MICHAEL JACKSON: They were supposed to go in, and just check fingerprints, and do the whole thing that they do when they take somebody in. They manhandled me very roughly. My shoulder is dislocated, literally. It's hurting me very badly. I'm in pain all the time. This is, see this arm? This is as far as I can reach it. Same with this side over here.

ED BRADLEY: Because of what happened at the police station?

MICHAEL JACKSON: Yeah. Yeah. At the police station. And what they did to me—

if you— if you saw what they did to my arms— it was very bad what they

COUNTY COUNSEL 27
105 Sam. Ampains Server
Sama Madems. CA 95101
(805) Sail-2x50
28

17

18

19

20

21

22

23

24

25

26

PROPOSED REDACTED MOTTON

CIN CUIDNSEE.

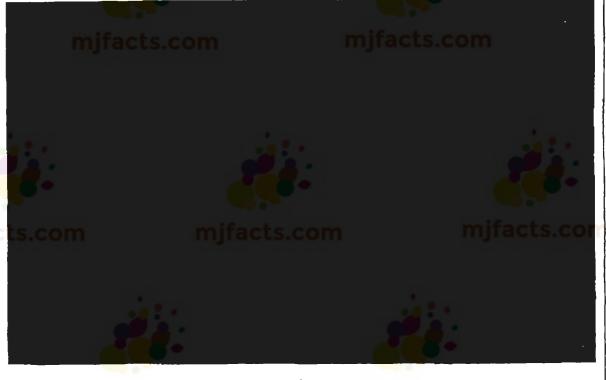
Sauta Barbers

did. It's very swollen. I don't wanna say. You'll see. You'll see. We were given a photograph said to be taken after Michael Jackson was released on bail. Jackson says the swelling above his wrist is where the police handcuffed him. ED BRADLEY: How did they do it? I mean, what, physically, what did they do? MICHAEL JACKSON: With the handcuffs, the way they tied 'em too tight behind my back—

ED BRADLEY: Behind your back?

MICHAEL JACKSON: Yeah. And putting it, they put it in a certain position, knowing that it's going to hurt, and affect my back. Now I can't move. I — It keeps me from sleeping at night. I can't sleep at night.

The Sheriff's Department denied the allegations. However, because of the seriousness of the allegations and the possibility of a civil claim for damages against the Sheriff's Department, Sheriff Jim Anderson on January 8, 2004, requested that the California Bureau of Investigation [CBI], under the jurisdiction of the California Attorney General, conduct an investigation into those allegations.



Mr. Jackson maligned the Sheriff's Department The charges were outrageous, The exposure to a civil lawsuit with potentially significant offensive civil damages was present and the Sheriff and the County took those claims very Mr. Jackson made a claim of mistreatment and abuse by the Sheriff's Department and its employees. He questioned the Integrity of the department. His Any comments about the claims are at best tangentially related to the pending criminal matter, and they in no way relate to the criminal charges brought against Mr. Jackson. NTY COUNSEL Ly of Sarua Barbara

PROPOSED PEDACTED MOTTON

Surture, CA 93101

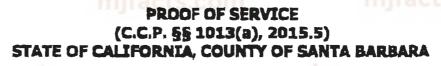
The Sheriff, of necessity, believes he must be cautious about any comments regarding Mr. Jackson and he does not want to violate the court's protective order. The Sheriff therefore makes this request in order to avoid any charge of violation of the court order and seeks the court's

EN SHANE STARK Chief Assistant County Counsel Attorneys for Jim Anderson, Sheriff, COUNTY OF SANTA BARBARA mjfacts.com

COUNTY COUNSEL

PROPOSED REDACTED MOTTO

TOTAL P.03



I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is 105 East Anapamu Street # 201, Santa Barbara, California.

On August 12, 2004 I served a true copy of the NOTICE OF MOTION AND MOTION OF JIM ANDERSON, SANTA BARBARA COUNTY SHERIFF, FOR **AUTHORIZATION TO RELEASE ATTORNEY GENERAL'S CONCLUSIONS** REGARDING ITS INVESTIGATION INTO DEFENDANT'S ALLEGATIONS OF MISTREATEMENT AT THE SANTA BARBARA COUNTY JAIL [REDACTED] on the Interested Parties in said action by:

facsimile transmission to the person(s) indicated below: B

Thomas A. Mesereau, Jr. Collins, Mesereau, Reddock & Yu, LLP (310) 861-1007 12

Steve Cochran, Esq. Katten, Muchin, Zavis & Rosenman, Lawyers (310) 712-8455

Robert Sanger, Esq. Sanger & Swysen, Lawyers (805) 963-7311

Thomas W. Sneddon, District Attorney Office of the District Attorney (805) 568-2398

depositing it in the United States Mail in a sealed envelope with postage P thereon fully prepaid to the following:

Brian Oxman, Esq. Oxman & Jaroscak, Lawyers 14126 E. Rosecrans Blvd. Santa Fe Springs, CA 90670

V (State) I declare, under penalty of perjury, that the above is true and correct.

Executed on August 12, 2004 at Santa Barbara, California.

Estella Rios

2

3

5

6

7

8

9

10

11

13

14