

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY  
County of Santa Barbara  
2 By: RONALD J. ZONEN (State Bar No. 85094)  
Senior Deputy District Attorney  
3 GORDON AUCHINCLOSS (State Bar No. 150251)  
Senior Deputy District Attorney  
4 GERALD McC. FRANKLIN (State Bar No. 40171)  
Senior Deputy District Attorney  
5 1112 Santa Barbara Street  
Santa Barbara, CA 93101  
6 Telephone: (805) 568-2300  
7 FAX: (805) 568-2398

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF SANTA BARBARA  
10 SANTA MARIA DIVISION

12 THE PEOPLE OF THE STATE OF CALIFORNIA,

13 Plaintiff,

14 v.

16 MICHAEL JOE JACKSON,

17 Defendant.

No. 1133603

PLAINTIFF'S PROPOSED  
REDACTION OF EXHIBITS  
OFFERED IN CONNECTION  
WITH PENDING MOTIONS TO  
SUPPRESS EVIDENCE  
(Pen. Code, § 1538.5)

DATE: September 17, 2004  
TIME: 8:30 a.m.  
DEPT: TBA (Melville)

18 UNDER SEAL

20 A. Introduction

21 Attached hereto are the People's proposed redactions of certain exhibits offered in  
22 connection with the pending motions by the defense to suppress evidence in this case.

23 B. Redacted Exhibits

24 The People propose that the following exhibits be released in redacted form:  
25 Exhibits 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 21, 34 and 35. The proposed  
26 redactions are reflected on the copies of those exhibits attached hereto.

27 ////

28 ////

1           C. Exhibits That May Be Released In Unredacted Form

2           The People respectfully submit that the following exhibits may be released in an  
3 unredacted form: Exhibits Nos. 23, 24, 25, 27, 28, 31, 36, 39a, 39b, 40, 45, 46, 47, 48, 49, 50,  
4 and 50a.

5           D. Exhibits That Do No Appear To Be "Redactable"

6           Exhibits 28, 29 and 30 are photographs and so cannot be redacted. Exhibit 41 is the  
7 "cheat sheet" list of fictional names, prepared for the guidance of the witnesses. Redacting this  
8 list would render Exhibit 41 meaningless. The People respectfully suggest that Exhibits 28,  
9 29, 30 and 41 not be released.

10          E. Exhibits That May Already Have Been Redacted

11          Exhibits 20, 38 and 42 are search warrants. The People believe the Court has  
12 already redacted these exhibits.

13          F. Exhibits The Status Of Which Is Presently Unresolved

14          Exhibit 1 is a copy of Item 200 on the Sheriff's property list. Exhibit 32 is a  
15 stipulation concerning the testimony of Beverly Hills Police Officer Tinkler. Exhibit 44 is a  
16 list of interview questions. The People are uncertain whether these exhibits should be released,  
17 either in an unredacted or a redacted form, and the undersigned will address the Court  
18 concerning them.

19                 DATED: September 17, 2004

20                         Respectfully submitted,

21                                 THOMAS W. SNEDDON, JR.  
22                                 District Attorney

23     
24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

PROOF OF SERVICE


STATE OF CALIFORNIA  
COUNTY OF SANTA BARBARA } SS

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and I am not a party to the within-entitled action. My business address is: District Attorney's Office; Courthouse; 1105 Santa Barbara Street, Santa Barbara, California 93101.

On September 17, 2004, I served the within PLAINTIFF'S PROPOSED REDACTION OF EXHIBITS OFFERED IN CONNECTION WITH PENDING MOTIONS TO SUPPRESS EVIDENCE on Defendant, by THOMAS A. MESEREAU, JR., STEVE COCHRAN, ROBERT SANGER, and BRIAN OXMAN by personally delivering a true copy thereof to them in open court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Santa Maria, California on this 17th day of September, 2004.

  
Thomas W. Sneddon, Jr.



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com

[PROPOSED REDACTIONS OMITTED]



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com

PROOF OF SERVICE

1013A(1)(3), 1013(c) CCP

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA:

I am a citizen of the United States of America and a resident of the county aforesaid. I am employed by the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action. My business address is 312-H East Cook Street, Santa Maria, California.

On SEPTEMBER 21, 20 04, I served a copy of the attached ORDER CONDITIONALLY SEALING PLAINTIFF'S PROPOSED REDACTION OF EXHIBITS addressed as follows:

THOMAS W. SNEDDON, DISTRICT ATTORNEY  
DISTRICT ATTORNEY'S OFFICE  
1105 SANTA BARBARA STREET  
SANTA BARBARA, CA 93101

THOMAS A. MESEREAU, JR.  
COLLINS, MESEREAU, REDDOCK & YU, LLP  
1875 CENTURY PARK EAST, 7<sup>TH</sup> FLOOR  
LOS ANGELES, CA 90067

FAX

By faxing true copies thereof to the receiving fax numbers of: 805-568-2398 (DISTRICT ATTORNEY); 310-861-1007 (THOMAS A. MESEREAU, JR). Said transmission was reported complete and without error. Pursuant to California Rules of Court 2005(i), a transmission report was properly issued by the transmitting facsimile machine and is attached hereto.

MAIL

By placing true copies thereof enclosed in a sealed envelope with postage fully prepaid, in the United States Postal Service mail box in the City of Santa Maria, County of Santa Barbara, addressed as above. That there is delivery service by the United States Postal Service at the place so addressed or that there is a regular communication by mail between the place of mailing and the place so addressed.

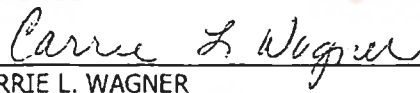
PERSONAL SERVICE

By leaving a true copy thereof at their office with their clerk therein or the person having charge thereof.

EXPRESS MAIL

By depositing such envelope in a post office, mailbox, sub-post office, substation, mail chute, or other like facility regularly maintained by the United States Postal Service for receipt of Express Mail, in a sealed envelope, with express mail postage paid.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 21<sup>ST</sup> day of SEPTEMBER, 20 04, at Santa Maria, California.

  
CARRIE L. WAGNER