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22	Defendant.	FORENSIC DATA	
21	MICHAEL J. JACKSON	COMPEL DISCOVERY AND RESPONSE TO STATUS REPORT RE: PRODUCTION OF	
20	vs.	MR. JACKSON'S REPLY IN SUPPORT OF MOTION TO	
19	Plaintiff, OM	EXPARTE APPLICATION FOR LEAVE TO FILE UNDER SEAL	
18	THE PEOPLE OF THE STATE OF CALIFORNIA,	CASE NO. 1133603	
17			
16	SANTA MARIA DIVISION		
15	FOR THE COUNTY OF SANTA BARBARA		
14	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
13	MICHAEL J. JACKSON		
	Attorneys for Defendant		
10	Santa Fe Springs, CA 90670 Telephone: 562-921-5058 Facsimile: 562-921-2298	م فرانس	
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5	Robert M. Sanger (SBN 58214)	GARY M. BLAIR. Executive Officer BY CANAL & WARRAN CARRIEL WOORES. Deput. Clerk	
4	Los Angeles, CA 90067 Telephone: 310-284-3120 Facsimile: 310-284-3133	OCT 1 2 0.74	
	1875 Century Park East, 7" Floor	SUPERIOR COUNT OF CALIFORNIA COUNTY OF SANTA BARBARA	
1	Thomas A. Mesereau, Jr. (SBN 91182) Susan Yu (SBN 195640) COLLINS, MESEREAU, REDDOCK & YU SUPERIOR COURT of CAUSORNIA		
	T (CD) (C1) (C1)		

Defendant Michael J. Jackson, through his counsel, hereby applies ex parte for leave to file under seal his application for a reply in support of motion to compel discovery and response to status report re: production of forensic data. Filing under seal is necessary because the content of the application includes reference to under seal and other information subject to this Court's protective order.

This application is based upon the attached declaration of Robert M. Sanger the file and record in this case and any other information presented prior to a ruling hereon,

October \coprod , 2004 Respectfully submitted,
Thomas A. Mesereau, Jr.

Susan Yu COLLINS, MESEREAU, REDDOCK & YU

Robert M. Sanger SANGER & SWYSEN

Brian Oxman OXMAN & JAROSCAK

Robert M. Sanger

Attorneys for Defendant MiCHAEL J. JACKSON

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DECLARATION OF ROBERT M. SANGER

I, Robert M. Sanger declare as follows:

1 2

I am an attorney duly authorized to practice before all courts of the State of California and am a partner of the law firm of Sanger & Swysen, co-counsel for Michael J. Jackson. I submit this declaration in support of an exparte application for leave to file under seal Mr. Jackson's application for a reply in support of motion to compel discovery and response to status report re: production of forensic data.

2. The reply describes materials that have been maintained <u>under seal</u> by this Court. Details about the investigation and other discovery are mentioned in the reply. Therefore, in accordance with the practice directed by this Court, leave is sought to file this motion <u>under seal</u>.

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

Executed this

day of October, 2004, at Santa Barbara, California.

Robert M. Sanger

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