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Attorneys for Defendant

MICHAEL JOSEPH JACKSON

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiffs,

vs.

MICHAEL JOSEPH JACKSON,

Defendant.

Case No. 1133603

ORDER ENDORSING SUBPOENA DUCES
TECUM TO DEPARTMENT OF CHILD
PROTECTIVE SERVICES, COUNTY OF
SANTA BARBARA

Honorable Rodney S. Melville

Date: October 29, 2004

Time: 8:30 am.

Dept: SM 2

FILED UNDER SEAL *by camera*

The Court having permitted Counsel to submit an Ex Parte Application, Counsel having done
so and GOOD CAUSE APPEARING THEREFORE,

IT IS HEREBY ORDERED that the evidence of witnesses, the Custodian of Records for the

ORDER ENDORSING SUBPOENA DUCES TECUM

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

NOV 05 2004

GARY M. BLAIR, Executive Officer
By *Carrie L. Wagner*
CARRIE L. WAGNER, Deputy Clerk

** unsealed pursuant
to 11/16/05 court
order*

SANTA BARBARA COUNTY
RECEIVED
OCT 29 PM 12:33

1 Department of Child Protective Services, County of Santa Barbara, is material and relevant, and the
2 Subpoena Duces Tecum for the records of that entity is necessary and relevant to this proceeding,
3 the Court hereby endorses the subpoena attached hereto dated October 28, 2004.

4 **NOTE:** Due to scheduling difficulties, any request for in camera
5 review of records or other objections to production should be set by
6 contacting the Superior Court, dept. 2, Santa Maria at 805-346-7678

7 DATED: _____

8 NOV 05 2004

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10 The Honorable Rodney Melville
11 Judge of the Superior Court of California
12 County of Santa Barbara

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ORDER ENDORSING SUBPOENA DUCES TECUM

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address): Thomas A. Mesereau, Jr. 91182 Brian Oxman 072172 (310) 284-3120 1875 Century Park East, Suite 700 14126 E. Rosecrans (562) 921-5058 Los Angeles, CA 90067 Santa Fe Springs, CA 90670		TELEPHONE NO.:	FOR COURT USE ONLY
ATTORNEY FOR (Name): Michael Joe Jackson			
Insert name of court, judicial district or branch court, if any, and post office and street address: Santa Barbara County Superior Court, Santa Maria Division 312 E. Cook Street (Dept. SM-2: Judge Rodney Melville) Santa Maria, CA 93454			
Title of case: The People of the State of California v. Michael Jackson, et al.			
SUBPENA (CRIMINAL OR JUVENILE)		CASE NUMBER:	1133603
<input checked="" type="checkbox"/> DUCES TECUM			

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (NAME):

Custodian of Records, Department of Child Protective Services, County of Santa Barbara

1. YOU ARE ORDERED TO APPEAR AS A WITNESS in this action at the date, time, and place shown in the box below UNLESS you make a special agreement with the person named in item 3:

a. Date: November 19, 2004	Time: 9:00 a.m.	<input checked="" type="checkbox"/> Dept.: SM-2	<input type="checkbox"/> Div.:	<input type="checkbox"/> Room:
b. Address: 312 E. Cook Street, Dept. SM-2 (Judge Rodney Melville) Santa Maria, CA 93454				

2. AND YOU ARE

- a. ☐ ordered to appear in person.
- b. ☒ not required to appear in person if you produce the records described in the accompanying affidavit and a completed declaration of custodian of records in compliance with Evidence Code sections 1560, 1561, 1562, and 1271. (1) Place a copy of the records in an envelope (or other wrapper). Enclose your original declaration with the records. Seal them. (2) Attach a copy of this subpoena to the envelope or write on the envelope the case name and number, your name and date, time, and place from item 1 (the box above). (3) Place this first envelope in an outer envelope, seal it, and mail it to the clerk of the court at the address in item 1. (4) Mail a copy of your declaration to the attorney or party shown at the top of this form.
- c. ☐ ordered to appear in person and to produce the records described in the accompanying affidavit. The personal attendance of the custodian or other qualified witness and the production of the original records is required by this subpoena. The procedure authorized by subdivision (b) of section 1560, and sections 1561 and 1562, of the Evidence Code will not be deemed sufficient compliance with this subpoena.
- d. ☐ ordered to make the original business records described in the accompanying affidavit available for inspection at your business address by the attorney's representative and to permit copying at your business address under reasonable normal business hours, conditions during normal business hours.

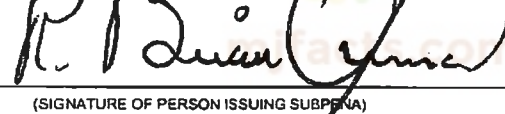
3. IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:

a. Name: Brian Oxman

b. Telephone number: (562) 921-5058

4. WITNESS FEES: You may be entitled to witness fees, mileage, or both, in the discretion of the court. Contact the person named in item 3 AFTER your appearance.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED BY A FINE, IMPRISONMENT, OR BOTH. A WARRANT MAY ISSUE FOR YOUR ARREST IF YOU FAIL TO APPEAR.

FOR COURT USE ONLY	Date: October 28, 2004	
		(SIGNATURE OF PERSON ISSUING SUBPENA)
		R. Brian Oxman
		(TYPE OR PRINT NAME)
		Attorney for Michael J. Jackson
		(TITLE)

(See reverse for proof of service)

- d. William Dickerman, State Bar Number 76237;
- e. Jamie Masada;
- f. Office of the District Attorney, County of Santa Barbara;
- g. Office of the Sheriff, County of Santa Barbara;
- h. Office of the District Attorney, County of Los Angeles;
- i. Los Angeles Police Department;
- j. Any federal, state, local, or government agency;
- k. Any personnel from the office of any of the above-named persons or entities, or any of their REPRESENTATIVES.

(4) Any and all documents constituting, evidencing, concerning, discussing or mentioning, either directly or indirectly, the case of People of the State of California v. Michael Jackson, Santa Barbara County Superior court Case No. 1133603.

Collins, Mesereau, Reddock & Yu, LLP
1875 Century Park East, 7th Floor
Los Angeles, CA 90067
(310) 284-3120

Brian Oxman 072172
14126 E. Rosecrans Blvd.
Santa Fe Springs, CA 90670
(562) 921-5058

Attorneys for defendant,
Mr. Michael Jackson

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA BARBARA

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs

MICHAEL JACKSON,

Defendant.

Case No. 1133603

DECLARATION AND
APPLICATION
FOR SUBPOENA DUCES TECUM

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

1. The undersigned states: That he is the attorney of record for defendant, Michael Jackson, in the above-entitled action and that this cause has been duly set for hearing on November 19, 2004, at 8:30 a.m. in Department SM-2 of the Santa Barbara Superior Court, located at 312 East Cook Street, Santa Maria, California 93454.

2. Witness the Custodian of Department of Child Protective Services, County of Santa Barbara, State of California, has in his possession or control the following documents, objects, or other tangible things:

A. INSTRUCTIONS AND DEFINITIONS:

(1) As used herein, the term "DOCUMENT" or "DOCUMENTS" means any handwritten, recorded, typed, printed, pictorial, or graphic matter whatsoever, however produced or reproduced, and including without limitation, all "WRITINGS" as defined in California Evidence Code § 250. The term "DOCUMENT" or "DOCUMENTS" also includes any data compilation of any sort, whether stored magnetically, electronically, or otherwise, from which information can be obtained, translated, or, if necessary,

through detection devices into reasonably usable form. Any comment or notation appearing on any document, and not a part of the original text, is considered a separate document and any copy, draft, or preliminary form of any document is also considered a separate document.

(2) As used herein, the term "DOCUMENT" is intended to include within its scope each and every "ORIGINAL" (as the term is defined in California Evidence Code Section 255), and each and every "DUPLICATE" (as the term is defined in Evidence Code Section 260), of each and every "WRITING" (as the term is defined in California Evidence Code § 250) described in the requests set forth below. All such documents are meant to referred to those DOCUMENTS which are within your possession and control, or subject to your possession or control.

(3) As used herein, "ACCOUNT" shall include, but not be limited to, any bank account, saving account, certificate of deposit, share draft account, time deposit, money market account, trust accounts, Individual Retirement Account, 401K account, public assistance fund, or other financial instrument or demand deposit. Where DOCUMENTS are requested concerning such ACCOUNTS, you shall produce all records of monthly statements, cancelled checks, deposit checks and drafts, deposit records and receipts, wire transfers, wire deposits, automatic withdrawals or deposits, monthly charges, interest payments, and fees.

(4) As used herein, the "COMPLAINANTS" refers to

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]

(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]

(e) Jay Daniel Jackson, date of birth [REDACTED] social security number [REDACTED]

or any person who is their representative, agent, or acting on their behalf, including their partners, corporations, or business entities where they have a property or ownership interest. The term "COMPLAINANTS" refers to all the individuals mentioned in this paragraph individually, whether or not the names of the others persons identified in this paragraph appear or are mentioned in the DOCUMENT. The term "COMPLAINANTS" also include present and former attorneys, agents, representatives, and any other persons acting on behalf of COMPLAINANT.

(5) As used herein, the "COMPLAINT" refers to the reports, claims, or allegations made by the COMPLAINANTS regarding Mr. Michael Jackson, which are stated in the Indictment in the case of People v. Michael Jackson, SBSC Case No. 1133603.

(6) "YOU" or "YOURS" refers to the Custodian of Records of the for Department of Child Protective Services, County of Santa Barbara, and all of its agents, representatives, employees, attorneys, or any person acting on his behalf.

(7) As used herein, "PERSON" or "PERSONS" means any natural individual in any capacity whatsoever, and all entities of every description, including, but not limited to, associations, organizations (public or private), agencies, companies, partnerships, joint ventures, corporations, and trusts.

(8) As used herein, "REPRESENTATIVE" or "REPRESENTATIVES" means any person (as defined herein) who acts, has at any time acted, or has purported to act, at the request of, for the benefit of, or on behalf of another, including, but not limited to, the parents, guardians, or agents of COMPLAINANT, businesses, partnership, corporation, in which they have an interest or association as reflected in YOUR records.

(9) As used herein, the term "COMMUNICATION" is to be interpreted comprehensively, and means any instance in which information was exchanged between or among two or more persons, including any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, and all understanding or exchanges of information between or among two or more persons.

(10) As used herein, the term "CORRESPONDENCE" means any handwritten, printed, typed, or otherwise recorded communication whatsoever between or among two or more persons, and includes, without limitation, memoranda, letters, notes, telegrams, telexes, facsimile transmissions, email records, and marginal notations or comments.

B. DOCUMENTS TO BE PRODUCED:

(1) All DOCUMENTS constituting, evidencing, concerning, discussing, or mentioning any complaint, child abuse report, mandatory health professional report, law enforcement referral, victim statement, investigation report, witness interview, social worker evaluation, in-home visit, communications to witnesses, communication to your agency, inter-office memos or communications, case findings or determinations, and records of all kinds relating to or concerning COMPLAINANTS, or any of their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]

(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]

(e) Jay Daniel Jackson, date of birth [REDACTED]
[REDACTED] social security number [REDACTED]

(2) All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any complaint, child abuse report, mandatory health professional report, law enforcement referral, victim statement, investigation report, witness interview, social worker evaluation, in-home visit, communications to witnesses, communications to your agency, inter-office memos or communications, case findings or determinations, and records of all kinds concerning or relating to Michael Joe Jackson.

(3) All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any correspondence, communication, discussion with you, or any of your REPRESENTATIVES, regarding Michael Joe Jackson, from any of the following:

- a. Gloria Rachel Allred, State Bar Number 65033;.
- b. Larry Robert Feldman, State Bar Number 45126;
- c. Carol Lieberman, M.D.;
- d. William Dickerman, State Bar Number 76237;
- e. Jamie Masada;
- f. Office of the District Attorney, County of Santa Barbara;
- g. Office of the Sheriff, County of Santa Barbara;
- h. Office of the District Attorney, County of Los Angeles;
- i. Los Angeles Police Department;
- j. Any federal, state, local, or government agency;
- k. Any personnel from the office of any of the above-named persons or entities, or any of their REPRESENTATIVES.

(4) Any and all documents constituting, evidencing, concerning, discussing or mentioning, either directly or indirectly, the case of People of the State of California v. Michael Jackson, Santa Barbara County Superior court Case No. 1133603.

3. The above documents are material to the issues involved in the case by reason of the following facts:

A. The information sought will lead to witness, documents, and discoverable evidence that will show the claims made in the Pending Criminal Case in the Santa Barbara Superior Court are unfounded.

B. The information sought by this subpoena will disclose motives, biases, and exaggerations on behalf of and engaged in by the various persons identified in the above requests who are witnesses in this proceeding;

ATTACHMENT TO ITEM 2(b)

Subpoena to Custodian of Records, Department of Child Protective
Services, County of Santa Barbara
October 28, 2004

(1) All DOCUMENTS constituting, evidencing, concerning, discussing, or mentioning any complaint, child abuse report, mandatory health professional report, law enforcement referral, victim statement, investigation report, witness interview, social worker evaluation, in-home visit, communications to witnesses, communication to your agency, inter-office memos or communications, case findings or determinations, and records of all kinds relating to or concerning COMPLAINANTS, or any of their REPRESENTATIVES, who are:

(a) Janet Arvizo, aka Janet Ventura or Janet Jackson, date of birth [REDACTED] social security number [REDACTED]

(b) Davellin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(c) Gavin Arvizo, date of birth [REDACTED] social security number [REDACTED]

(d) Star Arvizo, date of birth [REDACTED] social security number [REDACTED]

(e) Jay Daniel Jackson, date of birth [REDACTED] social security number [REDACTED]

(2) All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any complaint, child abuse report, mandatory health professional report, law enforcement referral, victim statement, investigation report, witness interview, social worker evaluation, in-home visit, communications to witnesses, communications to your agency, inter-office memos or communications, case findings or determinations, and records of all kinds concerning or relating to Michael Joe Jackson.

(3) All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any correspondence, communication, discussion with you, or any of your REPRESENTATIVES, regarding Michael Joe Jackson, from any of the following:

- a. Gloria Rachel Allred, State Bar Number 65033;.
- b. Larry Robert Feldman, State Bar Number 45126;
- c. Carol Lieberman, M.D.;

C. The information sought contains information regarding the background, motives, state of mind, character and reputation for veracity, and reports of COMPLAINANTS and the various persons identified in the above-requests who are witnesses in this proceeding;

D. The requested documents and/or information contains the prior inconsistent statements, recollections, observations, and reactions of COMPLAINANTS to the events and circumstances which gave rise to the Pending Criminal Case in the Santa Barbara Superior Court;

E. The requested materials constitute evidence of a financial motive for making false and inaccurate claims in this matter;

4. Good cause exists for the production of the above described matters and things by reason of the following facts:

A. The subpoenaed party is the sole and exclusive source of all such information, and no other person, business, or other entity has possession or control of such information.

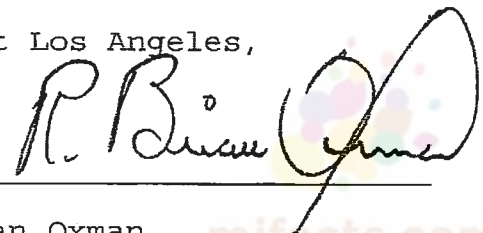
B. The information requested by this Subpoena discloses the motive, intent, and conscious state of mind of persons making claims in the Santa Barbara Superior Court, along with persons directing, counseling and controlling the complainants in the Santa Barbara Superior Court action.

C. No other source exists for such information because such disclosures were made only in the records of the subpoenaed party, and the only person with such information is the subpoenaed party.

WHEREFORE, request is made that the Subpoena Duces Tecum issue.

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

Executed this 28th day of October, at Los Angeles, California.

A handwritten signature in black ink, appearing to read "R. Brian Oxman", written over a horizontal line.

R. Brian Oxman

FILED
SUPERIOR COURT IN CALIFORNIA
COUNTY OF SANTA BARBARA

JUL 09 2007

GARY M. BLAIR, Executive Officer

Carrie L. Wagner
CARRIE L. WAGNER, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA

THE PEOPLE OF THE STATE OF CALIFORNIA,)	Case No.: 1133603
Plaintiff,)	Protective Order Regarding Defendant's
vs.)	Subpoenas Duces Tecum
MICHAEL JACKSON,)	
Defendant.)	

Good cause appearing, it is hereby ordered that the clerk of the court shall permit Defendant Michael Jackson, by and through his counsel, to subpoena materials without disclosing the nature of the subpoena, the person or items sought by the subpoena, or the response to the subpoena and any materials returned therewith.

It is further ordered, without limiting the generality of the foregoing, that:

1. The clerk of the court shall segregate and keep confidential and not disclose to the People any materials pertaining to the subpoena, including returns, documents, and other materials returned in response to said subpoena.

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1 2. The clerk of the court shall permit Counsel for the defendant to subpoena
2 materials to the court on days and times at which the case itself is not on calendar for
3 other purposes.

4 3. Persons or entities subpoenaed by the defendant shall not disclose directly or
5 indirectly to the People the fact that they have been subpoenaed or the nature of the
6 subpoena.

7 4. Any appearance, objection, compliance, or other communication by a party
8 subpoenaed by the defendant shall be filed under seal.

9 5. Any hearings involving the materials pertaining to the subpoena, including
10 returns, documents and other materials returned in response to the subpoena regarding
11 compliance, privacy or other issues shall be held in camera.

12 6. This order does not affect the right of any party whose records are subpoenaed
13 to assert any applicable claims of privilege.

14 7. Subject to the resolution of any issues of privilege that may be asserted, the
15 clerk of the court shall permit counsel for the defendant to inspect and copy the
16 subpoenaed materials.

17 8. A copy of this order shall be served with each subpoena to which it pertains.

18 DATED: JUL 09 2004

19 Rodney S. Melville
20 RODNEY S. MELVILLE
21 Judge of the Superior Court