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FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

NOV 30 2004

Attorneys for Larry R. Feldman

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

* Unsealed pursuant
to 6/11/05 court
order

8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

CASE NO. 1133603

13 Plaintiff,

13 OBJECTIONS TO DOCUMENTS
14 REQUESTED BY THE SUBPOENA
15 DUCES TECUM DATED NOVEMBER
16 11, 2004 AND SIGNED BY R. BRIAN
17 OXMAN, ATTORNEY FOR MICHAEL J.
18 JACKSON

14 v.

15 MICHAEL JACKSON,
16 Defendant.

FILED UNDER SEAL
In Camera

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19 Larry R. Feldman is responding to a subpoena duces tecum dated November 11, 2004
20 and signed by R. Brian Oxman, attorney for Michael J. Jackson. A copy of this subpoena is
21 attached as Exhibit "A".

22 Larry R. Feldman objects to this subpoena on the following grounds:

- 23 1. The subpoena requests documents that are protected from discovery and
24 production by the attorney-client privilege.
- 25 2. The subpoena requests documents that are protected from discovery and
26 production by the work-product doctrine.
- 27 3. The subpoena requests documents that are protected from discovery and
28 production by the constitutional right of privacy.

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4. The subpoena requests documents that are protected from discovery and production by other recognized privileges or doctrines.

5. The subpoena requests documents that are not relevant to any of the issues in this action.

DATED: 11.24.04

KAYE SCHOLER LLP
ROBERT M. TURNER

By 
ROBERT M. TURNER