

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY OF SANTA BARBARA

DEC 10 2003

GARY M. BLAIR, EXEC. OFFICER

By M. Hanson
Deputy Clerk

M. HANSON

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara
2 By: GERALD McC. FRANKLIN (State Bar No. 40171)
Senior Deputy District Attorney
3 1105 Santa Barbara Street
Santa Barbara, CA 93101
4 Telephone: (805)568-2300

5 Attorneys for The People, and Petitioner

6

7

8

SUPERIOR COURT OF THE STATE OF CALIFORNIA

9

COUNTY OF SANTA BARBARA

10

11 In the Matter of the Search Warrant for the

No. 884686

12 Neverland Ranch, 5225 Figueroa Mountain
13 Road, Los Olivos, California

REQUEST FOR ORDER
RELEASING CERTAIN
PROPERTY TO OWNER AND/
OR HIS DESIGNATED AGENT;
ORDER THEREON

14

15

16 Your petitioner is a deputy of the District Attorney of Santa Barbara
17 County.

18

19 In obedience to a search warrant executed on November 18, 2003 at the
20 residence premises of Michael Joe Jackson, located at 5225 Figueroa Mountain Road,
21 Los Olivos, California, certain computers with their associated hard drives and,
22 separately, certain computer hard drives, among other items of property, were seized
23 to facilitate their copying for further examination as appropriate. The computers and
24 hard drives are retained in the Sheriff's custody pursuant to Penal Code section 1536.

25

26 All but one of the hard drives have been copied and the copies will
27 remain in the custody of the Sheriff of Santa Barbara County, pending further order of
28 the court regarding their examination.

29

30 By agreement between the District Attorney of Santa Barbara County the
31 Sheriff of Santa Barbara County and Mark J. Geragos, attorney for Michael Joe

1 Jackson, the following computers and their associated hard drive, and the following
2 hard drives seized separately from their computers, shall be returned to their owner
3 care of his attorney, Mark J. Geragos, by means to be agreed upon:

- 4 — "Maxtor" hard drive, model no. 90510D4, ser. no. K40DDSDRA (Item 603);
- 5 — "Gateway 2000" computer, model no. P55C-233, ser. no. 0010530613 (Item
6 607);
- 7 — "Apple Powerbook" laptop computer, model no. G4, ser. no. QT33506AN4M
8 (Item 644);
- 9 — "Apple Powerbook" laptop computer, model no. G4, ser. no. UV304370NP4
10 (Item 645);
- 11 — "Apple" laptop "Powerbook" computer, model no. G4, ser. no. QT2310J4LP4
12 (Item 329);
- 13 — "Sony Vaio" laptop computer, model no. PCG-8D2L, ser. no.
14 28102830340716, (Item 333);
- 15 — "Sony Vaio" laptop computer, model no. PCG-8A2L, ser. no.
16 28335030608725, (Item 334);
- 17 — "Apple" iMac computer, model M6498, ser. no. QT206DUQLF4 (Item 342);
- 18 — "Sony Vaio" computer, model PCV-W20, ser. no. 3009406 (Item 344);
- 19 — "Compaq Presario" laptop computer, model 1675, ser. no. 1V94CGX5P0DF
20 (Item 345);
- 21 — "Apple Macintosh" Powerbook laptop computer, model G3, ser. no.
22 CK83004CCWN (Item 346);
- 23 — "Apple PowerMac" model G4 computer, ser. no. XB0380ATJNX (Item 347);

24 are to be returned by the Sheriff of Santa Barbara County to Mr. Jackson, care of his
25 attorney. The return will be facilitated in a manner agreed upon by counsel, if and
26 when such return is authorized by this Court.

27 The "Apple" laptop computer, serial no. Qt8520kaeev, listed as Item 308
28 on the Sheriff's property log, is being held for identification by a witness as possibly

1 belonging to that witness.

2 Work on the hard drive of "Apple EMAC" computer, model no. A1002
3 (Item 336) is not complete. A copy of the schematics of that particular computer is
4 deemed necessary before copying of the hard drive progresses to minimize the risk of
5 damage to the hard drive's contents thereof. The schematics have been ordered and
6 should arrive sometime next week. Counsel will be kept informed of progress, and the
7 hard drive will be released to counsel as soon as possible.

8 WHEREFORE, the People, in whose name the warrant was executed,
9 respectfully pray for an order authorizing the return of the above-described property,
10 with the exceptions of Items 308 and 336, to its owner and his designated
11 representative.

12 I declare under penalty of perjury that the foregoing is true and correct to
13 the best of my information and belief. I execute this declaration at Santa Barbara on
14 December 10, 2003.

15 
16 GERALD McC. FRANKLIN

17 ORDER FOR RELEASE OF PROPERTY

18 TO THE SHERIFF OF SANTA BARBARA COUNTY:

19 Good cause having been shown, it is ordered that the items described
20 above be released from your custody into the custody of Attorney Mark J. Geragos, the
21 lawyer for Michael Joe Jackson, the owner of said property. The transfer of custody
22 may be effected by means agreed upon by counsel.

23 DATED: December 10, 2003

24 
25 JUDGE OF THE SUPERIOR COURT
26
27
28