

* Unsealed pursuant to Lello's court order

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

DEC 10 2004

Specially Appearing for Mother of the Victim

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

FILED UNDER SEAL

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

13 Plaintiffs,

14 v.

15 MICHAEL JOSEPH JACKSON,

16 Defendant.

Case No. 1133603

PRIVILEGE LOG RE SUBPENA DUCES
TECUM TO GEORGE OWEN
FELDMAN AND CUSTODIAN OF
RECORDS FOR FELDMAN AND
ROTHSTEIN

DATE: December 22, 2004
TIME: 1:30 p.m.
DEPT.: SM 2

NO.	DATE	DESCRIPTION	BASIS FOR PRIVILEGE
1.	Undated	One sheet of paper containing photocopies of business cards for witnesses from the Westfield Shopping Town Mall in West Covina with handwritten notes with addresses and telephone numbers of persons	Attorney work product
2.	04/27/01	Plaintiff's Mediation Brief	Evidence Code §1152
3.	08/01/02	Letter from Thomas D. Rothstein to Janet Arvizo	Attorney-client privilege
4.	Undated	Information regarding minor's blocked account with attachments regarding said account	Attorney work product
5.	09/20/01	Plaintiff's Confidential Mediation Brief for mediation on September 21, 2001	Evidence Code §1152
6.	09/14/01	Letter from Law Offices of C. Michael Adler to Janet Arvizo regarding settlement offer from J. C. Penney	Attorney-client privilege

1	NO.	DATE	DESCRIPTION	BASIS FOR PRIVILEGE
2	7.	Undated	Fax confirmation invoice from JAMS Arbitration and Mediation Services to C. Michael Adler, Esq. with handwritten notes on said fax transmittal	Attorney work product
3				
4				
5	8.	09/20/01	Fax cover sheet from Law offices of C. Michael Adler to Judge William McVittie enclosing Mediation Brief with handwritten notes regarding settlement	Attorney work product
6				
7				
8	9.	09/13/01	Letter from Thomas J. Griffin of Nelson & Griffin to C. Michael Adler regarding settlement proposal	<i>Evidence Code §1152</i>
9				
10	10.	Undated	Legal notes on one 8-1/2 x 11 piece of paper with handwritten notes regarding David Arvizo, specifically his address, and some other illegible notes	Attorney work product
11				
12				
13	11.	Undated	Legal notes on one 8-1/2 x 11 piece of paper with handwritten notes of two paragraphs of things to do	Attorney work product
14				
15	12.	Undated	Legal notes on one 8-1/2 x 11 piece of paper regarding legal research	Attorney work product
16	13.	11/01/01	Handwritten notes on back of one piece of pleading paper regarding disposition of settlement proceeds	Attorney work product
17				
18	14.	Undated	Handwritten notices on one piece of legal size paper regarding message to Janet Arvizo	Attorney work product
19				
20	15.	08/16/01	Internal memorandum from Mike to Woody containing both handwritten and typewritten text regarding experts and other notes on things to do	Attorney work product
21				
22	16.	09/17/01	One page of attorney notes on 8-1/2 x 11 paper regarding experts	Attorney work product
23				
24	17.	10/10/01	Letter from Cheryl Henderson of Law Offices of C. Michael Adler to Janet Arvizo regarding settlement agreement	Attorney-client privilege
25				
26	18.	09/18/01	Internal memorandum from Cheryl to Michael Adler with typewritten text only regarding conversation with clerk	Attorney work product
27				
28	19.	Undated	One-page photocopy of attorney notes regarding taking depositions	Attorney work product

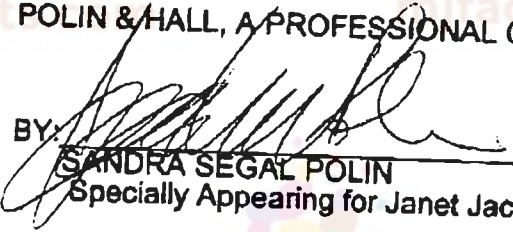
1	NO.	DATE	DESCRIPTION	BASIS FOR PRIVILEGE
2	20.	Undated	Downloaded pages of "Verdicts on Disk"—preparation for trial material	Attorney work product
3	21.	Undated	One page of legal notes on legal size paper containing notes on things to do	Attorney work product
4	22.	Undated	Attorney notes on legal size paper, 3 pages, stapled, containing addresses, telephone numbers, and names of persons	Attorney work product
5	23.	Undated	Document entitled "Character Witness List" containing handwritten interlineations and post-its with thirty party names, addresses, and telephone numbers	Attorney work product; right to privacy
6	24.	Undated	Original of document identified earlier containing photocopies of business cards from persons at Westfield Shopping Town Mall	
7	25.	09/20/00	Internal memorandum from Jane to Mike/File containing legal research regarding subsequent remedial measures	Attorney work product
8	26.		Subpoenaed documents from Hilton Hotels regarding Janet Arvizo's employment	Right to privacy
9	27.	Undated	Document entitled "Trial Notebook" regarding contents of trial notebook	Attorney work product
10	28.	08/19/99	Letter from Thomas C. Rothstein to Gavin Anton Arvizo regarding incident occurring on August 27, 1998	Attorney-client privilege
11	29.	08/19/99	Letter from Thomas C. Rothstein to Star David Arvizo regarding incident occurring on August 27, 1998	Attorney-client privilege
12	30.	08/19/99	Letter from Thomas C. Rothstein to Janet Ventura Arvizo regarding incident occurring on August 27, 1998	Attorney-client privilege
13	31.	08/19/99	Letter from Thomas C. Rothstein to Gavin Arvizo regarding incident occurring on August 27, 1998	Attorney-client privilege
14	32.	Undated	Attorney notes on 8-1/2 x 11 paper regarding Kaiser and other miscellaneous notes	Attorney work product

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NO.	DATE	DESCRIPTION	BASIS FOR PRIVILEGE
33.	Undated	Attorney notes on 8-1/2 x 11 paper with addresses and telephone numbers and other miscellaneous notes	Attorney work product
34.	01/08/01	Letter from Anthony N. Ranieri of Feldman & Rothstein to Janet and David Arvizo regarding deposition transcripts	Attorney-client privilege
35.	03/30/01	Letter from Anthony N. Ranieri of Feldman & Rothstein to Janet and David Arvizo regarding mediation	Attorney-client privilege
36.	04/04/01	Letter from Russell L. Bolin of Feldman & Rothstein to Janet and David Arvizo regarding mediation	Attorney-client privilege
37.	05/08/02	Letter from Mary Holzer to Janet Arvizo regarding bank account at City National Bank	Attorney-client privilege

Respectfully submitted,
POLIN & HALL, A PROFESSIONAL CORP.

DATED: December 9, 2004

BY: 
SANDRA SEGAL POLIN
Specially Appearing for Janet Jackson

PROOF OF SERVICE

1
2
3 **STATE OF CALIFORNIA**
4 **COUNTY OF LOS ANGELES**

} ss

5 I am employed in the County of Los Angeles, State of California. I am over the
6 age of 18 and not a party to the within action; my business address is 1620 26th Street,
Suite 2080 North, Santa Monica, California 90404.

7 On December 9, 2004, I served the foregoing document described as **PRIVILEGE**
8 **LOG RE SUBPOENA DUCES TECUM TO GEORGE OWEN FELDMAN AND**
9 **CUSTODIAN OF RECORDS FOR FELDMAN AND ROTHSTEIN** on the interested
party(ies) in this action by placing ___ the original X a true copy thereof addressed as
follows:

10 Thomas A. Mesereau, Jr., Esq.
11 Susan C. Yu, Esq.
12 COLLINS, MESEREAU, REDDOCK & YU
13 1875 Century Park East, 7th Floor
Los Angeles, CA 90067

Robert M. Sanger, Esq.
Sanger & Swysen
233 East Carillo Street, Suite C
Santa Barbara, CA 93101

Fax: (805) 963-7311

14 Brian Oxman, Esq.
15 Oxman & Jaroscak
16 14126 East Rosecrans
Santa Fe Springs, CA 90670

Ronald Zonen, Esq.
Santa Barbara Office District Attorney
1105 Santa Barbara St
Santa Barbara, CA 93101

Fax: (562) 921-2298

Fax: (805) 568-2398


17 Judge Rodney Melville
18 In Chambers

19 Fax: (805) 346-7688

20
21 X **BY FACSIMILE:** I caused the above-referenced document to be transmitted by
22 facsimile transmission on December 9, 2004 to the offices of the addressee(s)
listed above from facsimile machine number (310) 449-0014.

23
24 X **(State)** I declare under penalty of perjury under the laws of the State of California
that the above is true and correct.

25 Executed on December 9, 2004, at Santa Monica, California.

26
27 
28 Amanda Riel