

LATE

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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

DEC 18 2004

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11 MICHAEL JOE JACKSON

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF SANTA BARBARA
14 SANTA MARIA DIVISION

15 THE PEOPLE OF THE STATE OF
16 CALIFORNIA,

17 Plaintiff,

18 vs.

19 MICHAEL JOE JACKSON

20 Defendant.

) CASE NO. 1133603

) EX PARTE APPLICATION TO FILE UNDER
) SEAL MOTION TO COMPEL DISCOVERY;
) [PROPOSED] ORDER

) HEARING:

) DATE: DECEMBER 21, 2004

) TIME: 8:30 A.M.

) Place: Dept. SM-2

~~FILED UNDER SEAL & BY FAX~~

1 Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies *ex parte* for
2 leave to file under seal his motion to compel discovery ("Discovery Motion"). Filing under
3 seal is necessary because the content of the Discovery Motion includes references to
4 matters that are subject to this Court's Protective Order.

5 This application is based upon the attached declaration of Susan C. Yu, the files
6 and record in this case and any other information presented prior to a ruling hereon.

7 Dated: December 13, 2004

Respectfully submitted,

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9 COLLINS, MESEREAU, REDDOCK & YU
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Susan C. Yu

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Robert M. Sanger

12 OXMAN & JAROSCAK
13 Brian Oxman

14 By:


15 Susan C. Yu
16 Attorneys for MICHAEL JOE JACKSON


1 DECLARATION OF SUSAN C. YU

2 I, Susan C. Yu declare:

3 1. I am an attorney at law duly licensed to practice law in the courts of the
4 State of California, a partner in the law firm of Collins, Mesereau, Reddock & Yu, and co-
5 counsel for Mr. Michael Jackson in this criminal proceeding. I submit this declaration in
6 support of an *ex parte* application for leave to file under seal Mr. Jackson's Motion to
7 Compel Discovery ("Discovery Motion").

8 2. The Discovery Motion describes materials that are subject to this Court's
9 Protective Order. Therefore, in accordance with the directives by this Court, leave is
10 sought to file the Discovery Motion under seal.

11 I declare under penalty of perjury that the foregoing is true and correct and that this
12 declaration was executed this 13th day of December, 2004 at Los Angeles, California.

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15 Susan C. Yu