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Attorneys for Plaintiff WADE ROBSON

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

BY FAX

WADE ROBSON, an individual,

Plaintiff,

vs.

DOE 1, an individual; MJJ PRODUCTIONS,
INC., a California corporation; MJJ
VENTURES, INC., a California corporation;
and DOES 4-50, inclusive,

Defendants.

Case No.: BC508502

*[Related to Probate Case BP117321, In re the
Estate of Michael Joseph Jackson]*

*[Both cases assigned to the Honorable Judge
Mitchell L. Beckloff, Dept. 51]*

**PLAINTIFF WADE ROBSON'S NOTICE
OF MOTION AND MOTION TO COMPEL
PRODUCTION OF DOCUMENTS
REQUESTED PURSUANT TO SUBPOENA
DUCES TECUM; AND DECLARATION
OF MARYANN R. MARZANO IN
SUPPORT THEREOF**

[Cal. Code Civ. Proc. § 1987.1]

Hearing Date: October 1, 2014

Time: 8:30 a.m.

Place: Department 51

[Filed concurrently with [Proposed] Order]

CIT/CASE: BC508502
LEA/DEF#:
RECEIPT #: CCH520872020
DATE PAID: 07/07/14 02:26 PM
PAYMENT: \$60.00 \$10
RECEIVED:
CHECK: \$60.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

NOTICE OF MOTION AND MOTION TO COMPEL

07/08/2014

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on October 1, 2014 at 8:30 a.m. in Department 51 of the
3 above-entitled Court, located at 111 North Hill Street, Los Angeles, California 90012, Plaintiff
4 WADE ROBSON (hereinafter "Robson"), will move this Court for an order overruling the
5 objections of the EXECUTORS OF THE ESTATE OF MICHAEL JOSEPH JACKSON ON
6 BEHALF OF THE ESTATE (hereinafter, "Executors") to a Notice to Consumer served upon the
7 Executors on May 12, 2014 in connection with a Subpoena Duces Tecum ("Subpoena") served on
8 May 28, 2014, and enforcing compliance with the Subpoena.
9


10 This Motion to Compel ("Motion") is brought pursuant to California Code of Civil
11 Procedure ("CCP") § 1987.1, and is based on the grounds that the Executors' objections are
12 without merit or too general. This Motion is made and based upon this Motion, the
13 attached Memorandum of Points and Authorities and Declaration of Maryann R. Marzano, upon
14 all supporting documents and records on file in this action, and upon all other and further
15 evidence and/or oral argument that may be presented at the time of hearing on this matter.
16

17 A list of the parties and attorneys on whom this Notice of Motion and Motion is being
18 served is shown in the accompanying Proof of Service.
19

20 Dated: July 7, 2014

Respectfully submitted,

21 GRADSTEIN and MARZANO, P.C.
22 HENRY GRADSTEIN
23 MARYANN R. MARZANO
24 MATTHEW A. SLATER

25 By: 
26 Matthew A. Slater
27 Attorneys for Plaintiff
28 WADE ROBSON

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3 **MEMORANDUM OF POINTS AND AUTHORITIES**

4 **I. INTRODUCTION AND PROCEDURAL BACKGROUND**

5 This Motion is brought in connection with a Subpoena issued by Robson, which seeks
6 production of the police report and any other documents regarding the search of Neverland Ranch
7 conducted by Santa Barbara County law enforcement officials in connection with the criminal
8 investigation and subsequent trial of Michael Joseph Jackson ("Jackson") in 2004-2005.¹ The
9 production of these documents is critical to Robson's case, as they will undoubtedly yield a
10 considerable amount of evidence which will be of great assistance to Robson in supporting and
11 substantiating his claims against Jackson and Defendants MJJ Productions, Inc. and MJJ
12 Ventures, Inc. ("Defendants") for childhood sexual abuse pursuant to California Code of Civil
13 Procedure ("CCP") § 340.1. The Executors, however, have sought to block production of these
14 crucial documents (as indeed they have with *all* of Robson's other discovery requests propounded
15 in both this action and the related probate matter, *In re the Estate of Michael Joseph Jackson*,
16 BP117321 (the "Probate Action")), by objecting to the Notice to Consumer ("Notice") served
17 upon the Executors in conjunction with the Subpoena pursuant to CCP § 1985.3. As shall be
18 shown below, the Executors' objections are entirely without merit, and the Court should enforce
19 compliance with this highly relevant and properly issued Subpoena.
20

21 On May 12, 2014, Robson served the Notice and Subpoena upon the Executors. (See
22 Declaration of Maryann R. Marzano ("Marzano Decl.") attached hereto, ¶2). After waiting for the
23 statutorily required five-day period under CCP § 1985.3 between service of a Notice upon a
24 consumer and service of a Subpoena upon a custodian of records, Robson then served the
25 Subpoena upon both the Santa Barbara County District Attorney's Office ("SBDA") and Santa
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27 ¹ Indeed, a considerable amount of the material seized in this search was admitted into evidence and made public
28 during Jackson's criminal trial in 2005; see, e.g., <http://www.foxnews.com/story/2005/01/28/judge-oks-explicit-material-in-jacko-trial/>

1 Barbara County Sheriff's Department ("SBSD") on May 28, 2014. The Subpoena sought
2 production by both the SBDA and SBSD of "all DOCUMENTS that constitute, refer or relate to
3 any and all reports related to the search executed of Neverland Ranch in Santa Barbara County,"
4 with the date for production set for June 16, 2014. The Subpoena was issued along with thirty-six
5 (36) other subpoenas seeking witness statements taken during the 2004-2005 criminal
6 investigation and trial of Jackson, as well as eleven (11) additional subpoenas requesting witness
7 statements taken in connection with a criminal investigation of Jackson in 1993. The Subpoena
8 and the subpoenas seeking the 2004-2005 witness statements are duplicative of ones which had
9 previously been served on the SBDA and SBSD in the Probate Action; these are currently the
10 subject of a pending Motion to Quash by the Executors in the Probate Action, which was filed by
11 the Executors on April 23, 2014, and opposed by Robson on May 21, 2014. (Marzano Decl., ¶3).

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13
14 On June 12, 2014, the Executors served their objections to the Subpoena upon Robson,
15 citing the following grounds for their objections: (1) that the Notice was defective because it was
16 served upon "the Estate of Michael Jackson," which is not a legal entity capable of receiving
17 service; (2) that Robson failed to serve Notices upon other parties whose personal information is
18 being sought including, but not limited to, the legal guardians of Jackson's minor children (who
19 the Executors claim were living at the Neverland Ranch at the time of the search), and the alleged
20 victims of the criminal investigation; (3) that the Subpoena is duplicative of a Subpoena issued by
21 Robson in the Probate Action, and which is the subject of a pending Motion to Quash in the
22 Probate Action; (4) that the Subpoena is "overbroad, burdensome, oppressive and harassing;" (5)
23 that character evidence and evidence of "prior bad acts" are not relevant; and (6) that the
24 Executors have not had an opportunity to review the materials sought to determine to what extent
25 the documents are protected by privileges, and on that basis the Executors object on the grounds
26 of the attorney-client privilege, work-product doctrine, physician-patient privilege,
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1 psychotherapist-patient privilege, and any other privileges or immunities from discovery. The
2 Executors' objections were accompanied by a letter from counsel for the Estate to Mr. Kevin E.
3 Ready, the Santa Barbara County Counsel, stating that production of documents in response to
4 any of the aforementioned subpoenas "would be inappropriate until the pending motion to quash
5 is finally adjudicated." (Marzano Decl., ¶4).

7 **II. THE SUBPOENA SEEKS HIGHLY RELEVANT AND PROBATIVE EVIDENCE**
8 **AND THE EXECUTORS' OBJECTIONS ARE PART OF AN ONGOING**
9 **PATTERN OF STONEWALLING DISCOVERY**

10 CCP § 2017.010 states in pertinent part that:

11 [A]ny party may obtain discovery regarding any matter, not privileged, that is
12 relevant to the subject matter involved in the pending action or to the
13 determination of any motion made in that action, if the matter either is itself
14 admissible in evidence or appears reasonably calculated to lead to the discovery of
15 admissible evidence.
16

17 Here, the documents sought by the Subpoena (the police report of the Neverland
18 Ranch search and all related documents) are extremely relevant to Robson's case, as they will
19 almost certainly uncover evidence to support and help substantiate Robson's claims against
20 Defendants for childhood sexual abuse pursuant to CCP 340.1(a)(2). Robson seeks to establish
21 that Defendants breached their duty of care to him by aiding and abetting Jackson's sexual acts
22 with Robson for a period of almost six years, and the Subpoena is reasonably calculated to lead to
23 the discovery of such evidence by requesting only one highly probative report and all documents
24 related to the report. Thus, the Subpoena easily fulfills the essential requirements of CCP §
25 2017.010.
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1 Unlike in their pending Motion to Quash in the Probate Action, the Executors are
2 completely unable to object to the Subpoena on the grounds of relevancy as there is no question
3 that the search of Jackson's home in connection with a criminal investigation for childhood
4 sexual abuse has a bearing upon Robson's claims in this civil action. However, this does not stop
5 the Executors from objecting that the Subpoena seeks the same materials as the duplicate
6 subpoena in the Probate Action, or that the Subpoena is somehow "overbroad, burdensome,
7 oppressive and harassing." These objections are completely spurious and unfounded. Although
8 related to the Probate Action, this is a completely separate case which involves none of the claims
9 presentation issues upon which the Executors base their relevancy arguments in the Motion to
10 Quash, and Robson is fully entitled to take discovery on all matters relevant to *this* action.
11 Furthermore, the Subpoena seeks a narrow range of documents, and will not burden, oppress or
12 harass the Executors in any way as *they* will not be the ones responding to it. Thus, these
13 objections are clearly just another part of the Executors' ongoing pattern of completely frustrating
14 and stonewalling all of Robson's discovery, as can also be seen in their Motion to Quash and
15 Robson's multiple Motions to Compel in the Estate Action, and the Executors' objections to
16 Robson's written discovery in this action. (Marzano Decl., ¶5).

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19 **III. ROBSON HAS COMPLIED WITH THE NOTICE TO CONSUMER**
20 **REQUIREMENT AND EXECUTORS' OBJECTIONS REGARDING THE**
21 **NOTICE ARE MERITLESS**

22 The Executors further object that the Subpoena is defective because Robson failed to send
23 the requisite Notices to Consumer under CCP § 1983.5 to all interested third parties, who the
24 Executors vaguely state "include but are not limited to the alleged victims of the criminal
25 investigation and the legal guardians of Michael Jackson's minor children (who were living at the
26 property that was allegedly searched)." This is the exact same argument the Executors raised in
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1 their Motion to Quash in the Probate Action (*See* Motion to Quash, 12:1-13:13), and again the
2 Executors completely fail to identify any of these parties by name or provide any details
3 whatsoever regarding the “personal information” that will be revealed by the Subpoena without
4 these unnamed parties’ consent. Clearly, the Executors are once again using this vague
5 speculation about what may or may not be contained in the search report as a means of
6 stonewalling discovery, and preventing Robson from obtaining evidence which may prove crucial
7 to establishing his claims. If the Executors are truly concerned with protecting the privacy of
8 these other unnamed parties, these concerns can be addressed through other means that are not
9 completely prejudicial to Robson’s case, such as an *in camera* review or a protective order.

11 **IV. THE EXECUTORS’ PRIVILEGE CLAIMS ARE TOO VAGUE TO CONSTITUTE**
12 **GROUND FOR OBJECTING TO THE SUBPOENA**

14 The Executors also raise the objection that they “have not had the opportunity to review
15 the materials sought in order to determine the extent to which the documents involve materials
16 protected by numerous privileges,” and therefore assert the attorney-client privilege, work-
17 product doctrine, physician-patient privilege, psychotherapist-patient privilege, and any other
18 privileges or immunities from discovery. They further object that it “may include documents
19 involving the fundamental privacy rights of nonparties to the proceeding, including documents
20 that may be protected by the physician-patient, psychotherapist-patient and other privileges.”

22 Although the Executors are the holders of Jackson’s attorney-client, physician-patient and
23 psychotherapist-privileges pursuant to California Evidence Code §§ 953 (c), 993(c) and 1013(c),
24 their objections fail to establish an adequate factual basis for asserting these privileges. In order to
25 claim the privileges under Evidence Code §§ 952, 992 and 1012, the proponent must show that:
26 (1) the communication was made in the course of the attorney, physician or psychotherapist
27 relationship; (2) the communication was transmitted in confidence, and to no third parties other
28

1 than those present to further the patient's interest in the consultation, or those to whom disclosure
2 is reasonably necessary to accomplish the purpose of the consultation; and (3) the communication
3 includes a diagnosis or advice given in the course of the relationship. (See, e.g., Evidence Code
4 §§ 952, 992, 1012; *Mahoney v. Superior Court* (1983) 142 Cal. App. 3d 937, 940-941 (party
5 claiming psychotherapist-patient privilege has burden of establishing psychotherapist-patient
6 relationship); *Horowitz v. Sacks* (1928) 89 Cal. App. 336, 344 (communication made by
7 physician to patient was in front of patient's family members and therefore not privileged);
8 *Ascherman v. Superior Court* (1967) 254 Cal. App. 2d 506, 515-516 (conversation between
9 physician and patient regarding plaintiff in the matter was not privileged because it bore no
10 relation to treatment by the physician).) The objections asserted by the Executors, however,
11 present *no* specific facts whatsoever to support these claims, and merely allude to the likelihood
12 of privileged information being contained in the subpoenaed witness statements. Thus, the
13 Executors' claims of privilege fall considerably short of the required standard.

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16 If the Executors in fact have legitimate privilege/privacy concerns, both on their own
17 behalf and on behalf of so-called unnamed third parties as noted above, these can be addressed
18 through other means which do not completely undermine Robson's rights to discovery in this
19 action. For example, California Penal Code § 1524(c) mandates that when documents are
20 obtained pursuant to a search warrant from the office of an attorney, physician, psychotherapist or
21 clergy member who is not reasonably suspected of committing a crime, that person must be given
22 an in-court hearing to raise any privilege issues regarding the seized documents. (See Penal Code
23 § 1524(c).) In this case, the subpoenaed documents arise from a police search of Neverland
24 Ranch conducted pursuant to a valid warrant. This was not a search of an attorney's office,
25 doctor's office or the office of a member of the clergy. It is obvious that the Executors are
26 gasping at proverbial straws to find some thread to hang their specious objection upon in an effort
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1 to further stonewall the appropriate discovery to which Robson is entitled, and which he is
2 seeking to obtain via the Subpoena. Even if there were a shred of legitimacy to the Executors'
3 objection, which there is not, this Court could readily set a hearing to review the materials and
4 allow the Executors and other interested third parties to raise their purported privilege concerns
5 prior to production to Robson.
6

7 **V. THE EVIDENCE SOUGHT BY THE SUBPOENA IS ADMISSIBLE UNDER**
8 **EVIDENCE CODE §§ 1101(b) AND 1105 TO SHOW PLAN, INTENT, HABIT**
9 **AND CUSTOM**

10 The Executors contend that the evidence sought by the Subpoena is inadmissible evidence
11 of Jackson's "prior bad acts" under Evidence Code § 1101(a). However, Robson is not seeking
12 evidence to prove that Decedent acted in conformity with his character on a specific occasion, but
13 rather to show that Decedent had a distinct and repeated "modus operandi" which is often the
14 signature of serial pedophiles. Evidence Code § 1101(b) provides that "Nothing in this section
15 prohibits the admission of evidence that a person committed a crime, civil wrong, or other act
16 when relevant to prove some fact (such as motive, opportunity, intent, preparation, plan,
17 knowledge, identity, absence of mistake or accident, or whether a defendant in a prosecution for
18 an unlawful sexual act or attempted unlawful sexual act did not reasonably and in good faith
19 believe that the victim consented) other than his or her disposition to commit such an act," and
20 Evidence Code § 1105 further provides that "Any otherwise admissible evidence of habit and
21 custom is admissible to prove conduct on a specified occasion in conformity with the habit or
22 custom." Thus, any evidence that Jackson sought opportunities for his alleged crimes and
23 planned and prepared them in a habitual, customary manner (or that Jackson did not reasonably
24 and in good faith believe that any of his alleged victims consented to sexual acts) will be
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1 admissible, and the Subpoenas are reasonably calculated to lead to the discovery of such
2 evidence.

3 VI. THE SBDA AND SBSB ARE PREPARED TO COMPLY WITH THE
4 SUBPOEANA AND PRODUCE DOCUMENTS IN RESPONSE THEREOF UPON
5 ISSUANCE OF AN ORDER ALLOWING THEM TO DO SO BY THIS COURT
6

7 As referenced in the accompanying Marzano Decl., the SBDA and SBSB are ready to
8 produce responsive documents to the Subpoena upon entry of an order by this Court authorizing
9 them to do so.

10 VII. CONCLUSION

11 Based on the foregoing, Robson respectfully requests that the Court issue an Order
12 overruling the Executors' objections to the Subpoena, and enforcing compliance with the
13 Subpoena by the Santa Barbara County District Attorney's Office and Santa Barbara County
14 Sheriff's Department.
15

16 Dated: July 7, 2014

17 Respectfully submitted,
18 GRADSTEIN and MARZANO, P.C.
19 HENRY GRADSTEIN
20 MARYANN R. MARZANO
21 MATTHEW A. SLATER

22 By: Matthew Slater

23 Matthew A. Slater
24 Attorneys for Plaintiff
25 WADE ROBSON
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07/08/2014



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Declaration



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1 4. On June 12, 2014, the Executors served their objections to the Subpoena upon
2 Robson. The Executors' objections were accompanied by a letter from counsel for the Estate to
3 Mr. Kevin E. Ready, the Santa Barbara County Counsel. True and correct copies of the
4 Executors' objections and the letter to Mr. Ready are attached hereto as Exhibit B.

5 5. In response to the purported objections served by the Executors herein, I
6 communicated our position with respect to the propriety (in this case, the lack thereof), to Mr.
7 Ready. There were several additional rounds of communications with Mr. Ready and counsel for
8 the Executors, true and correct copies of which are attached hereto for the Court's review as
9 Exhibit C.

10 6. Presently pending before this Court are multiple motions filed by Robson seeking
11 to compel responses and the production of documents by the Executors and Estate of Michael
12 Jackson to various discovery served in both the related Probate action (*In re the Estate of Michael*
13 *Joseph Jackson*, BP117321) and this civil action. Not only have the Executors sought to block
14 production by the SBDA and SBSD of the documents sought pursuant to the Subpoena which is
15 the subject of this Motion in the civil action, but they have categorically sought to block virtually
16 all discovery propounded in the Probate Action, as well as the all of the subpoenas served on the
17 SBDA and SBSD in the Probate Action

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

20 Executed this 7th day of July, 2014, at Los Angeles, California.

21
22 
23 Maryann R. Marzano



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07/08/2014

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Maryann R. Marzano (#96867) Henry Gradstein (#89747) Matthew Slater (#259986) Gradstein and Marzano P.C. 6310 San Vicente Blvd, Suite 510 Los Angeles, CA 90048 TELEPHONE NO.: 323-776-3100 FAX NO. (Optional): E-MAIL ADDRESS (Optional): mslater@gradstein.com ATTORNEY FOR (Name): Plaintiff Wade Robson		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90011 BRANCH NAME: Central District Stanley Mosk Courthouse		CASE NUMBER: BC 508502
PLAINTIFF/ PETITIONER: Wade Robson DEFENDANT/ RESPONDENT: Doe 1, et al.		
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)		

NOTICE TO CONSUMER OR EMPLOYEE

TO (name): ESTATE OF MICHAEL JACKSON

- PLEASE TAKE NOTICE THAT REQUESTING PARTY (name): Plaintiff Wade Robson
 SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): June 16, 2014
 The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought): See Attachment
 A copy of the subpoena is attached.
- IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED.
 IN ITEM a. OR b. BELOW:
 - If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the witness and the deposition officer named in the subpoena at least five days before the date set for production of the records.
 - If you are not a party to this action, you must serve on the requesting party and on the witness, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should not be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
- YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: May 12, 2014

Matthew Slater

(TYPE OR PRINT NAME)

(SIGNATURE OF ☐ REQUESTING PARTY ☒ ATTORNEY)

OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS

- ☐ I object to the production of all of my records specified in the subpoena.
- ☐ I object only to the production of the following specified records:

The specific grounds for my objection are as follows:

Date:

(TYPE OR PRINT NAME)

(SIGNATURE)

(Proof of service on reverse)

EXH A

PLAINTIFF/PETITIONER: Wade Robson

CASE NUMBER:

DEFENDANT/RESPONDENT: Doe 1, et al.

BC 508502

PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☒ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):
- a. ☐ Personal service. I personally delivered the *Notice to Consumer or Employee and Objection* as follows:
- (1) Name of person served: (3) Date served:
- (2) Address where served: (4) Time served:
- b. ☒ Mail. I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
- (1) Name of person served: ESTATE OF MICHAEL JACKSON (3) Date of mailing: May 12, 2014
- (2) Address: (4) Place of mailing (city and state):
- See Attachment Los Angeles, CA
- (5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.
- c. My residence or business address is (specify): 6310 San Vicente Blvd, #510, Los Angeles, CA 90048
- d. My phone number is (specify): 323-776-3100

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

Date: May 12, 2014

Nicole Sekeres

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Objection to Production of Records* as follows (complete either a or b):
- a. ON THE REQUESTING PARTY
- (1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:
- (i) Name of person served: (iii) Date served:
- (ii) Address where served: (iv) Time served:
- (2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
- (i) Name of person served: (iii) Date of mailing:
- (ii) Address: (iv) Place of mailing (city and state):
- (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
- b. ON THE WITNESS
- (1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:
- (i) Name of person served: (iii) Date served:
- (ii) Address where served: (iv) Time served:
- (2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
- (i) Name of person served: (iii) Date of mailing:
- (ii) Address: (iv) Place of mailing (city and state):
- (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
3. My residence or business address is (specify):
4. My phone number is (specify):

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

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

SHORT TITLE:

Wade Robson v. Doe 1, et al.

CASE NUMBER:

BC 508502

ATTACHMENT (Number): One

(This Attachment may be used with any Judicial Council form.)

From Page One:

1. The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought).

Santa Barbara County Sheriff's Office
4434 Calle Real
Santa Barbara, CA 93110

c/o Office of County Council
Clerk of the Board of Supervisors
Attn: Kevin E. Ready, Sr., Esq.

From Page Two:

2.
b. (2)


Howard Weitzman, Esq.
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Boulevard, 3rd Floor
Santa Monica, CA 90401

07/08/2014

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3

(Add pages as required)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Marvann Marzano (#96867) Henry Gradstein (#89747) Matthew Slater (#259986) Gradstein and Marzano P.C. 6310 San Vicente Blvd. #510, Los Angeles, CA 90048 TELEPHONE NO.: 323-776-3100 FAX NO.: E-MAIL ADDRESS: mslater@gradstein.com ATTORNEY FOR (Name): Plaintiff Wade Robson		SUBP-01 FOR COURT USE ONLY	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90011 BRANCH NAME: Central District - Stanley Mosk			
PLAINTIFF/PETITIONER: Wade Robson DEFENDANT/RESPONDENT: Doe 1, et al.			
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS			
		CASE NUMBER: BC 508502	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
Santa Barbara County Sheriff's Office, See Attachment

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

To (name of deposition officer): Matthew Slater
On (date): June 16, 2014 At (time): 3:00pm
Location (address): 6310 San Vicente Blvd., #510, Los Angeles, CA 90048
Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☐ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☒ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
3. *The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):*

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: May 12, 2014

Matthew Slater

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Claimant

(Proof of service on reverse)

(TITLE)

PLAINTIFF/PETITIONER: Wade Robson	CASE NUMBER:
DEFENDANT/RESPONDENT: Doe 1, et al.	BC 508502

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: \$

(2) ☐ Copying fees were paid.

Amount: \$

f. Fee for service: \$

2. I received this subpoena for service on (date):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

07/10/14

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

Date:

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

SHORT TITLE:

Wade Robson v. Doe 1, et al.

CASE NUMBER:

BC 508502

ATTACHMENT (Number): One*(This Attachment may be used with any Judicial Council form.)*

Santa Barbara County Sheriff's Office
4434 Calle Real
Santa Barbara, CA 93110

c/o Office of County Council
Clerk of the Board of Supervisors
Attn: Kevin E. Ready, Sr., Esq.

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

07/08/2014

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3*(Add pages as required)*

1 **ATTACHMENT 3**

2 **I.**

3 **DEFINITIONS**

4 The following definitions are provided in the spirit of good faith and cooperation to assist
5 the responding party in responding to the Document Requests made by requesting party below.

6 1. The terms "DOCUMENT" or "DOCUMENTS" are used herein in the fullest and
7 most expansive sense and as used in California Code of Civil Procedure Section 2031.010(a), and
8 as defined in California Evidence Code Section 250, to include, but are not limited to, all
9 handwritten, printed, graphic, typed, electronically recorded, sound recorded or computer readable
10 materials, or other recorded or graphic matter of every type and description, however and by
11 whomever prepared, produced, reproduced, assimilated or made, in any form which is or was in
12 your actual or constructive possession, custody or control, whether the original, draft or any
13 carbon, photographic or other copy, reproduction or facsimile thereof, including, but not limited
14 to, any and all records, files, statements, interviews, investigative reports, writings, letters,
15 correspondence, bulletins, instructions, graphs, charts, diagrams, pictures, reports, memoranda,
16 notations of telephone or personal conversations or conferences, messages, transcripts,
17 agreements, interoffice communications, calendars, diaries, logs, notes, notebooks, drafts,
18 microfilm, discs, e-mails, summaries, reports, books, statistics, computer tapes or discs, audio
19 tapes, compact discs, DVDs, videotapes, cassette tapes, sound recordings, data compilations from
20 which information can be obtained or can be translated through detection devices into usable form,
21 or any other tangible thing. The terms "DOCUMENT" and "DOCUMENTS" shall also mean each
22 copy which is not identical to the original or to any identified copy, and all drafts and notes
23 (whether typewritten, handwritten or otherwise) made or prepared in connection with such
24 documents, whether used or not.

25 2. The term "COMMUNICATIONS" shall mean the transfer or exchange of any kind
26 or nature, whether orally, by DOCUMENT, telephone, facsimile, computer, e-mail, text or other
27 electronic transfer, personal delivery, or by any other means whatsoever.

1 II.

2 INSTRUCTIONS

3 1. If a written or printed DOCUMENT also exists in electronic form, all forms of the
4 DOCUMENT should be produced.

5 2. DOCUMENTS within the possession, care, custody or control of the Santa Barbara
6 County Sheriff's Office and/or the Office of the Santa Barbara County District Attorney should be
7 produced, including DOCUMENTS in the possession of attorneys, agents, investigators,
8 consultants or experts. Without limiting the term "control" as used in the preceding sentence, a
9 document is deemed to be within the control of the Santa Barbara County Sheriff's Office and/or
10 the Office of the Santa Barbara County District Attorney, regardless of its physical location, if the
11 responding party(ies) have the right to secure the document or a copy thereof from another person
12 or entity, either public or private.

13 3. If a DOCUMENT was destroyed, lost, discarded or otherwise disposed of, please
14 identify: (a) the subject matter of the DOCUMENT, (b) the date of its disposal, (c) the persons
15 having knowledge of the circumstances under which it was disposed, and (d) the reason for its
16 disposal.

17 4. If a DOCUMENT is withheld under a claim of privilege, list (a) the document
18 request to which it is responsive; (b) its title and general subject matter; (c) its date; (d) the
19 name(s) and title(s) of its authors or preparer; (e) the name(s) and title(s) of the person(s) for
20 whom it was prepared and all persons to whom it was sent or shown; and (f) the nature of the
21 privilege being claimed.

22 5. If a privilege is asserted only as to a portion of a DOCUMENT, the portion of the
23 DOCUMENT as to which no privilege is being asserted should be produced. To the extent that a
24 DOCUMENT or portion thereof is subject to a constitutional or other right of privacy privilege,
25 requesting party is agreeable to having such privileged DOCUMENT or portion produced subject
26 to a confidentiality agreement and [proposed] protective order to be entered in the above-
27 captioned case of *Robson v. Doe I, et al.*, LASC Case No. BC508502 and/or the related probate
28 action *Estate of Michael Joseph Jackson*, LASC Case No. BP117321. Such agreement shall

1 require that any party using such privileged DOCUMENT must do so in a manner that safeguards
2 those privacy rights, including the redaction of confidential information (such as social security
3 numbers, financial information, home addresses, telephone numbers and the like) in any public
4 filing, and the filing of any unredacted privileged DOCUMENT under seal.

5 6. Documents should be produced as TIF image files in an electronic
6 format. Specifically, the TIF images should be produced as a single-page Group IV TIF format
7 and accompanied by a Concordance Image load file (or other generally acceptable load file
8 format). The full extracted text (or OCR where not available) should be included and produced at
9 a document level. Metadata information should be produced in the Concordance DAT file format
10 or other mutually-acceptable format. The DAT file or other mutually agreeable format should
11 provide the following meta-data fields: custodian name, file name or subject line, original path or
12 inbox folder path, To, From, CC, BCC, create date, modify or sent date, beginning and ending
13 bates numbers, page count, and attachment range. Any electronic spreadsheets should be
14 produced in native format.

15 III.

16 DOCUMENT REQUESTS

17 1. Please produce all DOCUMENTS that constitute, refer or relate to any and all
18 reports related to the search executed of Neverland Ranch in Santa Barbara County.

07 / 08 / 2014

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Maryann R. Marzano (#96867) Henry Gradstein (#89747) Matthew Slater (#259986) Gradstein and Marzano P.C. 6310 San Vicente Blvd, Suite 510 Los Angeles, CA 90048 TELEPHONE NO.: 323-776-3100 FAX NO. (Optional): E-MAIL ADDRESS (Optional): mslater@gradstein.com ATTORNEY FOR (Name): Plaintiff Wade Robson		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90011 BRANCH NAME: Central District Stanley Mosk Courthouse		CASE NUMBER: BC 508502
PLAINTIFF/ PETITIONER: Wade Robson DEFENDANT/ RESPONDENT: Doe 1, et al.		
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)		

NOTICE TO CONSUMER OR EMPLOYEE

TO (name): ESTATE OF MICHAEL JACKSON

- PLEASE TAKE NOTICE THAT REQUESTING PARTY (name): Plaintiff Wade Robson
 SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): June 16, 2014
 The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought): See Attachment
 A copy of the subpoena is attached.
- IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED IN ITEM a. OR b. BELOW:
 - If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the witness and the deposition officer named in the subpoena at least five days before the date set for production of the records.
 - If you are not a party to this action, you must serve on the requesting party and on the witness, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should not be filed with the court. WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.
- YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: May 12, 2014

Matthew Slater

(TYPE OR PRINT NAME)

(SIGNATURE OF ☐ REQUESTING PARTY ☒ ATTORNEY)

OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS

- ☐ I object to the production of all of my records specified in the subpoena.
- ☐ I object only to the production of the following specified records:

3. The specific grounds for my objection are as follows:

Date:

(TYPE OR PRINT NAME)

(SIGNATURE)

(Proof of service on reverse)

PLAINTIFF/PETITIONER: Wade Robson

CASE NUMBER:

DEFENDANT/RESPONDENT: Doe 1, et al.

BC 508502

PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION
(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☒ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):
 - a. ☐ Personal service. I personally delivered the *Notice to Consumer or Employee and Objection* as follows:
 - (1) Name of person served:
 - (2) Address where served:
 - (3) Date served:
 - (4) Time served:
 - b. ☒ Mail. I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (1) Name of person served: ESTATE OF MICHAEL JACKSON
 - (2) Address: See Attachment
 - (3) Date of mailing: May 12, 2014
 - (4) Place of mailing (city and state): Los Angeles, CA
- (5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.
- c. My residence or business address is (specify): 6310 San Vicente Blvd, #510, Los Angeles, CA 90048
- d. My phone number is (specify): 323-776-3100

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

Date: May 12, 2014

Nicole Sekeres

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS
(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Objection to Production of Records* as follows (complete either a or b):
 - a. ON THE REQUESTING PARTY
 - (1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
 - b. ON THE WITNESS
 - (1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
3. My residence or business address is (specify):
4. My phone number is (specify):

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

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

SHORT TITLE:	CASE NUMBER:
Wade Robson v. Doe 1, et al.	BC 508502

ATTACHMENT (Number): One

(This Attachment may be used with any Judicial Council form.)

From Page One:

1. The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought).

Office of the Santa Barbara District Attorney
1112 Santa Barbara Street
Santa Barbara, CA 93101

c/o Office of County Council
Clerk of the Board of Supervisors
Attn: Kevin E. Ready, Sr., Esq.

From Page Two:

2.
b. (2)

Howard Weitzman, Esq.
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Boulevard, 3rd Floor
Santa Monica, CA 90401

07/08/2014

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3

(Add pages as required)

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in Item 3, as follows:

Location (address): 6310 San Vicente Blvd., #510, Los Angeles, CA 90048

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☐ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. ☒ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Matthew Slater

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Claimant

(Proof of service on reverse)

(TITLE)

Page 1 of 2

PLAINTIFF/PETITIONER: Wade Robson	CASE NUMBER:
DEFENDANT/RESPONDENT: Doe 1, et al.	BC 508502

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: \$

(2) ☐ Copying fees were paid.

Amount: \$

f. Fee for service: \$

2. I received this subpoena for service on (date):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

SHORT TITLE:

Wade Robson v. Doe 1, et al.

CASE NUMBER:

BC 508502

ATTACHMENT (Number): One

(This Attachment may be used with any Judicial Council form.)

Office of the Santa Barbara District Attorney
1112 Santa Barbara Street
Santa Barbara, CA 93101

c/o Office of County Council
Clerk of the Board of Supervisors
Attn: Kevin E. Ready, Sr., Esq.

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mjfacts.com

07/08/2014

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3

(Add pages as required)

1 **ATTACHMENT 3**

2 **I.**

3 **DEFINITIONS**

4 The following definitions are provided in the spirit of good faith and cooperation to assist
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6 1. The terms "DOCUMENT" or "DOCUMENTS" are used herein in the fullest and
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9 handwritten, printed, graphic, typed, electronically recorded, sound recorded or computer readable
10 materials, or other recorded or graphic matter of every type and description, however and by
11 whomever prepared, produced, reproduced, assimilated or made, in any form which is or was in
12 your actual or constructive possession, custody or control, whether the original, draft or any
13 carbon, photographic or other copy, reproduction or facsimile thereof, including, but not limited
14 to, any and all records, files, statements, interviews, investigative reports, writings, letters,
15 correspondence, bulletins, instructions, graphs, charts, diagrams, pictures, reports, memoranda,
16 notations of telephone or personal conversations or conferences, messages, transcripts,
17 agreements, interoffice communications, calendars, diaries, logs, notes, notebooks, drafts,
18 microfilm, discs, e-mails, summaries, reports, books, statistics, computer tapes or discs, audio
19 tapes, compact discs, DVDs, videotapes, cassette tapes, sound recordings, data compilations from
20 which information can be obtained or can be translated through detection devises into usable form,
21 or any other tangible thing. The terms "DOCUMENT" and "DOCUMENTS" shall also mean each
22 copy which is not identical to the original or to any identified copy, and all drafts and notes
23 (whether typewritten, handwritten or otherwise) made or prepared in connection with such
24 documents, whether used or not.

25 2. The term "COMMUNICATIONS" shall mean the transfer or exchange of any kind
26 or nature, whether orally, by DOCUMENT, telephone, facsimile, computer, e-mail, text or other
27 electronic transfer, personal delivery, or by any other means whatsoever.
28

1 II.

2 INSTRUCTIONS

3 1. If a written or printed DOCUMENT also exists in electronic form, all forms of the
4 DOCUMENT should be produced.

5 2. DOCUMENTS within the possession, care, custody or control of the Santa Barbara
6 County Sheriff's Office and/or the Office of the Santa Barbara County District Attorney should be
7 produced, including DOCUMENTS in the possession of attorneys, agents, investigators,
8 consultants or experts. Without limiting the term "control" as used in the preceding sentence, a
9 document is deemed to be within the control of the Santa Barbara County Sheriff's Office and/or
10 the Office of the Santa Barbara County District Attorney, regardless of its physical location, if the
11 responding party(ies) have the right to secure the document or a copy thereof from another person
12 or entity, either public or private.

13 3. If a DOCUMENT was destroyed, lost, discarded or otherwise disposed of, please
14 identify: (a) the subject matter of the DOCUMENT, (b) the date of its disposal, (c) the persons
15 having knowledge of the circumstances under which it was disposed, and (d) the reason for its
16 disposal.

17 4. If a DOCUMENT is withheld under a claim of privilege, list (a) the document
18 request to which it is responsive; (b) its title and general subject matter; (c) its date; (d) the
19 name(s) and title(s) of its authors or preparer; (e) the name(s) and title(s) of the person(s) for
20 whom it was prepared and all persons to whom it was sent or shown; and (f) the nature of the
21 privilege being claimed.

22 5. If a privilege is asserted only as to a portion of a DOCUMENT, the portion of the
23 DOCUMENT as to which no privilege is being asserted should be produced. To the extent that a
24 DOCUMENT or portion thereof is subject to a constitutional or other right of privacy privilege,
25 requesting party is agreeable to having such privileged DOCUMENT or portion produced subject
26 to a confidentiality agreement and [proposed] protective order to be entered in the above-
27 captioned case of *Robson v. Doe I, et al.*, LASC Case No. BC508502 and/or the related probate
28 action *Estate of Michael Joseph Jackson*, LASC Case No. BP117321. Such agreement shall

1 require that any party using such privileged DOCUMENT must do so in a manner that safeguards
2 those privacy rights, including the redaction of confidential information (such as social security
3 numbers, financial information, home addresses, telephone numbers and the like) in any public
4 filing, and the filing of any unredacted privileged DOCUMENT under seal.

5 6. Documents should be produced as TIF image files in an electronic
6 format. Specifically, the TIF images should be produced as a single-page Group IV TIF format
7 and accompanied by a Concordance Image load file (or other generally acceptable load file
8 format). The full extracted text (or OCR where not available) should be included and produced at
9 a document level. Metadata information should be produced in the Concordance DAT file format
10 or other mutually-acceptable format. The DAT file or other mutually agreeable format should
11 provide the following meta-data fields: custodian name, file name or subject line, original path or
12 inbox folder path, To, From, CC, BCC, create date, modify or sent date, beginning and ending
13 bates numbers, page count, and attachment range. Any electronic spreadsheets should be
14 produced in native format.

15 III.

16 DOCUMENT REQUESTS

17 1. Please produce all DOCUMENTS that constitute, refer or relate to any and all
18 reports related to the search executed of Neverland Ranch in Santa Barbara County.
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07/08/2014



Jonathan Steinsapir
Direct Dial: (310) 566-9834
Direct Fax: (310) 566-9884
E-Mail: jsteinsapir@kwikalaw.com

June 12, 2014

VIA E-MAIL AND OVERNIGHT DELIVERY

Kevin E. Ready Esq.
Office of County Counsel
105 E. Anapamu Street, Suite 201
Santa Barbara, CA 93101
E-Mail: ready@countycounsel.com

Re: Subpoenas in Robson v. Doe I, et al., LASC Case No. BC 508502

Dear Mr. Ready:

As you know, we are counsel for John Branca and John McClain, the Executors under the Will of Michael J. Jackson and the personal representatives of his Estate (hereafter "the Executors"). On behalf of the Executors, I enclose objections to Subpoenas recently served by Wade Robson on the Sheriff and District Attorney for the County of Santa Barbara. The Executors are not parties to the civil action in which the subpoenas were issued.

As you also know, essentially the exact same subpoenas were served by Mr. Robson in connection with a petition he filed in pending probate proceedings—In re the Estate of Michael J. Jackson, Los Angeles Superior Court Case No. BP 117321—to which the Executors are parties. The probate proceedings and the above-referenced civil action are both pending before the same judicial officer in the Los Angeles Superior Court. The Executors have filed a motion to quash those subpoenas (a copy of that motion was served on you when it was filed).

Among other reasons, the Subpoenas issued in the above-referenced civil action are defective because consumer notices were not served on all interested parties, including but not limited to the legal guardians of the late Michael Jackson's minor children (who were living with Mr. Jackson during the criminal investigation). These same issues (along with other issues set out in our enclosed objections) are being litigated in connection with the motion to quash the Subpoenas issued in the probate matter to which the Executors are parties. Accordingly, producing any documents in response to the Subpoenas in the above-referenced action would be inappropriate until the pending motion to quash is finally adjudicated.

07/08/2014

EXH-B

Kevin E. Ready Esq.
June 12, 2014
Page 2

Please feel free to contact me if you have any questions.

Very truly yours,



Jonathan P. Steinsapir

Jonathan Steinsapir

Enclosures

cc: Howard Weitzman
Jeryll S. Cohen
Maryann Marzano
Henry Gradstein

10386.00226/217802

07/08/2014

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Maryann R. Marzano (#96867) Henry Gradstein (#89747) Matthew Slater (#259986) Gradstein and Marzano P.C. 6310 San Vicente Blvd, Suite 510 Los Angeles, CA 90048 TELEPHONE NO.: 323-776-3100 FAX NO. (Optional): E-MAIL ADDRESS (Optional): mslater@gradstein.com ATTORNEY FOR (Name): Plaintiff Wade Robson		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90011 BRANCH NAME: Central District Stanley Mosk Courthouse		CASE NUMBER: BC 508502
PLAINTIFF/ PETITIONER: Wade Robson DEFENDANT/ RESPONDENT: Doe 1, et al.		
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)		

NOTICE TO CONSUMER OR EMPLOYEE

TO (name): ESTATE OF MICHAEL JACKSON

- PLEASE TAKE NOTICE THAT REQUESTING PARTY (name): Plaintiff Wade Robson
 SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): June 16, 2014
 The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought): See Attachment
 A copy of the subpoena is attached.
- IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED IN ITEM a. OR b. BELOW:
 - If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the witness and the deposition officer named in the subpoena at least five days before the date set for production of the records.
 - If you are not a party to this action, you must serve on the requesting party and on the witness, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should not be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
- YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: May 12, 2014

Matthew Slater

(TYPE OR PRINT NAME)

(SIGNATURE OF ☐ REQUESTING PARTY ☒ ATTORNEY)

OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS

- ☒ I object to the production of all of my records specified in the subpoena.
- ☐ I object only to the production of the following specified records:

3. The specific grounds for my objection are as follows:

SEE ATTACHMENT A

Date:

Aaron Liskin

(TYPE OR PRINT NAME)

(SIGNATURE)

(Proof of service on reverse)

PLAINTIFF/PETITIONER: Wade Robson	CASE NUMBER:
DEFENDANT/RESPONDENT: Doe 1, et al.	BC 508502

PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION
(Code Civ. Proc., §§ 1985.3, 1985.8)

☐ Personal Service ☒ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):
 - a. ☐ Personal service. I personally delivered the *Notice to Consumer or Employee and Objection* as follows:
 - (1) Name of person served:
 - (2) Address where served:
 - (3) Date served:
 - (4) Time served:
 - b. ☒ Mail. I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (1) Name of person served: ESTATE OF MICHAEL JACKSON
 - (2) Address: See Attachment
 - (3) Date of mailing: May 12, 2014
 - (4) Place of mailing (city and state): Los Angeles, CA
 - (5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.
 - c. My residence or business address is (specify): 6310 San Vicente Blvd, #510, Los Angeles, CA 90048
 - d. My phone number is (specify): 323-776-3100

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

Date: May 12, 2014

Nicole Sekeres

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS
(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Objection to Production of Records* as follows (complete either a or b):
 - a. ON THE REQUESTING PARTY
 - (1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
 - b. ON THE WITNESS
 - (1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
3. My residence or business address is (specify):
4. My phone number is (specify):

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

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

SHORT TITLE:

Wade Robson v. Doe 1, et al.

CASE NUMBER:

BC 508502

ATTACHMENT (Number): One

(This Attachment may be used with any Judicial Council form.)

From Page One:

1. The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought).

Santa Barbara County Sheriff's Office
4434 Calle Real
Santa Barbara, CA 93110

c/o Office of County Council
Clerk of the Board of Supervisors
Attn: Kevin E. Ready, Sr., Esq.

From Page Two:

2.
b. (2)

Howard Weitzman, Esq.
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Boulevard, 3rd Floor
Santa Monica, CA 90401

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3

(Add pages as required)

ATTACHMENT A

1
2 The Executors under the Will of Michael Jackson and the personal representatives of his
3 Estate, John Branca and John McClain (the "Executors"), hereby object to the subpoena served by
4 Wade Robson on Santa Barbara County Sheriff's Office for records purportedly pertaining to the
5 Estate of Michael Jackson (the "Subpoena") on the following grounds: The Executors object to the
6 consumer notice served on "ESTATE OF MICHAEL JACKSON" as being defective on its face in
7 that it was served on a non-existent entity. It is well-established principle of American
8 jurisprudence that an estate of a decedent is not a legal entity with the capacity to be served with
9 process. "An estate is neither a person, natural or artificial, nor a legal entity, and cannot sue or be
10 sued. It is merely a name to indicate the sum total of the assets and liabilities of the decedent."
11 *Toledo v. Superior Court*, 19 Cal.App.3d 450, 454 (1971). See also *Blue Ridge Ins. Co. v.*
12 *Stanewich*, 142 F.3d 1145, 1150 (9th Cir. 1998); *F.D.I.C. v. Conner*, 20 F.3d 1376, 1383-84 (5th
13 Cir. 1994). Thus, the service of a consumer notice on "ESTATE OF MICHAEL JACKSON" is a
14 nullity. Without waiver of the foregoing objection, the Executors further state the following
15 objections. The Executors object to the Subpoena on the grounds that Wade Robson failed to
16 serve the requisite Consumer Notices on certain individuals whose personal information is being
17 sought, as required by Code of Civil Procedure sections 1985.3 and 1985.4. Persons who should
18 have been provided with consumer notices include, but are not limited to the alleged victims of the
19 criminal investigation and the legal guardians of Michael Jackson's minor children (who were
20 living at the property that was allegedly searched). The Executors further object to the Subpoena
21 on the grounds that it seeks materials that are the subject of a pending motion to quash filed by the
22 Executors in a related action in the Probate Court, Los Angeles Superior Court Case No. BP
23 117321. The Executors object to the Subpoena on the grounds that it is overbroad, burdensome,
24 oppressive and harassing. The Executors object in that character evidence and evidence of "prior
25 bad acts" are not relevant. The Executors object to the Subpoena on the grounds that the
26 Executors have not had the opportunity to review the materials sought in order to determine the
27 extent to which the documents involve materials protected by numerous privileges. Because of
28 that, the Executors object to the Subpoena to the extent it seeks information protected by the

1 attorney-client privilege, the work product doctrine, the physician-patient, psychotherapist-patient
2 privilege and other privileges or immunities from discovery. The Executors object to the
3 Subpoena on the grounds that it may include documents involving the fundamental privacy rights
4 of nonparties to the proceeding, including documents that may be protected by the physician-
5 patient, psychotherapist-patient and other privileges.

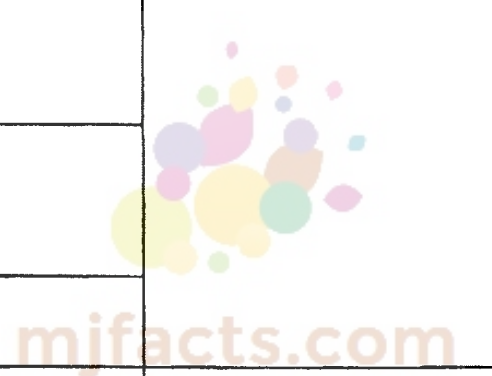
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2
OBJECTIONS TO SUBPOENA TO SANTA BARBARA COUNTY SHERIFF'S OFFICE

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Maryann Marzano (#96867) Henry Gradstein (#89747) Matthew Slater (#259986) Gradstein and Marzano P.C. 6310 San Vicente Blvd. #510, Los Angeles, CA 90048 TELEPHONE NO.: 323-776-3100 FAX NO.: E-MAIL ADDRESS: mslater@gradstein.com ATTORNEY FOR (Name): Plaintiff Wade Robson	FOR COURT USE ONLY 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90011 BRANCH NAME: Central District - Stanley Mosk	
PLAINTIFF/PETITIONER: Wade Robson DEFENDANT/RESPONDENT: Doe 1, et al.	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	CASE NUMBER: BC 508502

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
Santa Barbara County Sheriff's Office, See Attachment

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Matthew Slater On (date): June 16, 2014 Location (address): 6310 San Vicente Blvd., #510, Los Angeles, CA 90048	At (time): 3:00pm
Do not release the requested records to the deposition officer prior to the date and time stated above.	

- a. ☐ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☒ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

See Attachment 3

☒ Continued on Attachment 3.

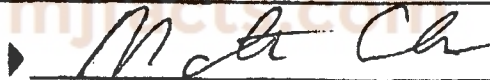
4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: **May 12, 2014**

Matthew Slater

(TYPE OR PRINT NAME)


 (SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Claimant

(Proof of service on reverse)

(TITLE)

Page 1 of 2

PLAINTIFF/PETITIONER: Wade Robson	CASE NUMBER:
DEFENDANT/RESPONDENT: Doe 1, et al.	BC 508502

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: \$ _____

(2) ☐ Copying fees were paid.

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

07/08/2014

SHORT TITLE:

Wade Robson v. Doe 1, et al.

CASE NUMBER:

BC 508502

ATTACHMENT (Number): One*(This Attachment may be used with any Judicial Council form.)*

Santa Barbara County Sheriff's Office
4434 Calle Real
Santa Barbara, CA 93110

c/o Office of County Council
Clerk of the Board of Supervisors
Attn: Kevin E. Ready, Sr., Esq.

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3*(Add pages as required)*

1 **ATTACHMENT 3**

2 **I.**

3 **DEFINITIONS**

4 The following definitions are provided in the spirit of good faith and cooperation to assist
5 the responding party in responding to the Document Requests made by requesting party below.

6 1. The terms "DOCUMENT" or "DOCUMENTS" are used herein in the fullest and
7 most expansive sense and as used in California Code of Civil Procedure Section 2031.010(a), and
8 as defined in California Evidence Code Section 250, to include, but are not limited to, all
9 handwritten, printed, graphic, typed, electronically recorded, sound recorded or computer readable
10 materials, or other recorded or graphic matter of every type and description, however and by
11 whomever prepared, produced, reproduced, assimilated or made, in any form which is or was in
12 your actual or constructive possession, custody or control, whether the original, draft or any
13 carbon, photographic or other copy, reproduction or facsimile thereof, including, but not limited
14 to, any and all records, files, statements, interviews, investigative reports, writings, letters,
15 correspondence, bulletins, instructions, graphs, charts, diagrams, pictures, reports, memoranda,
16 notations of telephone or personal conversations or conferences, messages, transcripts,
17 agreements, interoffice communications, calendars, diaries, logs, notes, notebooks, drafts,
18 microfilm, discs, e-mails, summaries, reports, books, statistics, computer tapes or discs, audio
19 tapes, compact discs, DVDs, videotapes, cassette tapes, sound recordings, data compilations from
20 which information can be obtained or can be translated through detection devices into usable form,
21 or any other tangible thing. The terms "DOCUMENT" and "DOCUMENTS" shall also mean each
22 copy which is not identical to the original or to any identified copy, and all drafts and notes
23 (whether typewritten, handwritten or otherwise) made or prepared in connection with such
24 documents, whether used or not.

25 2. The term "COMMUNICATIONS" shall mean the transfer or exchange of any kind
26 or nature, whether orally, by DOCUMENT, telephone, facsimile, computer, e-mail, text or other
27 electronic transfer, personal delivery, or by any other means whatsoever.

07/08/2014

II.

INSTRUCTIONS

1. If a written or printed DOCUMENT also exists in electronic form, all forms of the DOCUMENT should be produced.

2. DOCUMENTS within the possession, care, custody or control of the Santa Barbara County Sheriff's Office and/or the Office of the Santa Barbara County District Attorney should be produced, including DOCUMENTS in the possession of attorneys, agents, investigators, consultants or experts. Without limiting the term "control" as used in the preceding sentence, a document is deemed to be within the control of the Santa Barbara County Sheriff's Office and/or the Office of the Santa Barbara County District Attorney, regardless of its physical location, if the responding party(ies) have the right to secure the document or a copy thereof from another person or entity, either public or private.

3. If a DOCUMENT was destroyed, lost, discarded or otherwise disposed of, please identify: (a) the subject matter of the DOCUMENT, (b) the date of its disposal, (c) the persons having knowledge of the circumstances under which it was disposed, and (d) the reason for its disposal.

4. If a DOCUMENT is withheld under a claim of privilege, list (a) the document request to which it is responsive; (b) its title and general subject matter; (c) its date; (d) the name(s) and title(s) of its authors or preparer; (e) the name(s) and title(s) of the person(s) for whom it was prepared and all persons to whom it was sent or shown; and (f) the nature of the privilege being claimed.

5. If a privilege is asserted only as to a portion of a DOCUMENT, the portion of the DOCUMENT as to which no privilege is being asserted should be produced. To the extent that a DOCUMENT or portion thereof is subject to a constitutional or other right of privacy privilege, requesting party is agreeable to having such privileged DOCUMENT or portion produced subject to a confidentiality agreement and [proposed] protective order to be entered in the above-captioned case of *Robson v. Doe I, et al.*, LASC Case No. BC508502 and/or the related probate action *Estate of Michael Joseph Jackson*, LASC Case No. BP117321. Such agreement shall

1 require that any party using such privileged DOCUMENT must do so in a manner that safeguards
2 those privacy rights, including the redaction of confidential information (such as social security
3 numbers, financial information, home addresses, telephone numbers and the like) in any public
4 filing, and the filing of any unredacted privileged DOCUMENT under seal.

5 6. Documents should be produced as TIF image files in an electronic
6 format. Specifically, the TIF images should be produced as a single-page Group IV TIF format
7 and accompanied by a Concordance Image load file (or other generally acceptable load file
8 format). The full extracted text (or OCR where not available) should be included and produced at
9 a document level. Metadata information should be produced in the Concordance DAT file format
10 or other mutually-acceptable format. The DAT file or other mutually agreeable format should
11 provide the following meta-data fields: custodian name, file name or subject line, original path or
12 inbox folder path, To, From, CC, BCC, create date, modify or sent date, beginning and ending
13 bates numbers, page count, and attachment range. Any electronic spreadsheets should be
14 produced in native format.

15 III.

16 DOCUMENT REQUESTS

17 1. Please produce all DOCUMENTS that constitute, refer or relate to any and all
18 reports related to the search executed of Neverland Ranch in Santa Barbara County.

07/08/2014

KINSELLA WEITZMAN ISER KUMP & ALDISERT LLP
808 WILSHIRE BOULEVARD, 3RD FLOOR
SANTA MONICA, CALIFORNIA 90401
TEL 310.566.9800 • FAX 310.566.9850

7102/80/70

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 808 Wilshire Boulevard, 3rd Floor, Santa Monica, CA 90401.

On June 12, 2014, I served true copies of the following document(s) described as **OBJECTION BY NON-PARTY TO PRODUCE RECORDS** on the interested parties in this action as follows:

Henry Gradstein, Esq.
Maryann R. Marzano, Esq.
Gradstein & Marzano, P.C.
6310 San Vicente Boulevard, Suite 510
Los Angeles, CA 90048

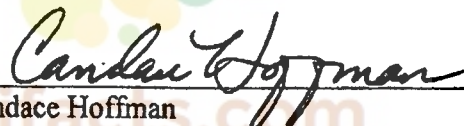
Attorneys for Wade Robson
Tel: 323-302-9488
Fax: 323-931-4990
hgradstein@gradstein.com
mmarzano@gradstein.com

☐ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Kinsella Weitzman Iser Kump & Aldisert LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a courtesy copy of the document(s) to be sent from e-mail address choffman@kwikalaw.com to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **BY OVERNIGHT DELIVERY:** I enclosed said document(s) in an envelope or package provided by the overnight service carrier and addressed to the persons at the addresses listed above or on the attached Service List. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight service carrier or delivered such document(s) to a courier or driver authorized by the overnight service carrier to receive documents.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 12, 2014, at Santa Monica, California.


Candace Hoffman

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Maryann R. Marzano (#96867) Henry Gradstein (#89747) Matthew Slater (#259986) Gradstein and Marzano P.C. 6310 San Vicente Blvd, Suite 510 Los Angeles, CA 90048 TELEPHONE NO.: 323-776-3100 FAX NO. (Optional): E-MAIL ADDRESS (Optional): mslater@gradstein.com ATTORNEY FOR (Name): Plaintiff Wade Robson	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90011 BRANCH NAME: Central District Stanley Mosk Courthouse	
PLAINTIFF/ PETITIONER: Wade Robson DEFENDANT/ RESPONDENT: Doe I, et al.	CASE NUMBER: BC 508502
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)	

NOTICE TO CONSUMER OR EMPLOYEE

TO (name): ESTATE OF MICHAEL JACKSON

- PLEASE TAKE NOTICE THAT REQUESTING PARTY (name): Plaintiff Wade Robson
SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): June 16, 2014
The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought): See Attachment
A copy of the subpoena is attached.
- IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED. IN ITEM a. OR b. BELOW:
 - If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the witness and the deposition officer named in the subpoena at least five days before the date set for production of the records.
 - If you are not a party to this action, you must serve on the requesting party and on the witness, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should not be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
- YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: May 12, 2014

Matthew Slater

(TYPE OR PRINT NAME)

(SIGNATURE OF ☐ REQUESTING PARTY ☒ ATTORNEY)

OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS

- ☒ I object to the production of all of my records specified in the subpoena.
- ☐ I object only to the production of the following specified records:

3. The specific grounds for my objection are as follows:

SEE ATTACHMENT A

Date:

Aaron Liskin

(TYPE OR PRINT NAME)

(SIGNATURE)

(Proof of service on reverse)

07/08/2014

PLAINTIFF/PETITIONER: Wade Robson	CASE NUMBER:
DEFENDANT/RESPONDENT: Doe 1, et al.	BC 508502

PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION
(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☒ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):
 - a. ☐ **Personal service.** I personally delivered the *Notice to Consumer or Employee and Objection* as follows:
 - (1) Name of person served:
 - (2) Address where served:
 - (3) Date served:
 - (4) Time served:
 - b. ☒ **Mail.** I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (1) Name of person served: ESTATE OF MICHAEL JACKSON
 - (2) Address: See Attachment
 - (3) Date of mailing: May 12, 2014
 - (4) Place of mailing (city and state): Los Angeles, CA
- (5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.
- c. My residence or business address is (specify): 6310 San Vicente Blvd, #510, Los Angeles, CA 90048
- d. My phone number is (specify): 323-776-3100

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

Date: May 12, 2014

Nicole Sekeres

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS
(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Objection to Production of Records* as follows (complete either a or b):
 - a. **ON THE REQUESTING PARTY**
 - (1) ☐ **Personal service.** I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ **Mail.** I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
 - b. **ON THE WITNESS**
 - (1) ☐ **Personal service.** I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ **Mail.** I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
3. My residence or business address is (specify):
4. My phone number is (specify):

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

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

07/08/2014

SHORT TITLE:

Wade Robson v. Doe 1, et al.

CASE NUMBER:

BC 508502

ATTACHMENT (Number): One

(This Attachment may be used with any Judicial Council form.)

From Page One:

1. The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought).

Office of the Santa Barbara District Attorney
1112 Santa Barbara Street
Santa Barbara, CA 93101

c/o Office of County Council
Clerk of the Board of Supervisors
Attn: Kevin E. Ready, Sr., Esq.

From Page Two:

2.
b. (2)

Howard Weitzman, Esq.
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Boulevard, 3rd Floor
Santa Monica, CA 90401

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3

(Add pages as required)

ATTACHMENT A

1
2 The Executors under the Will of Michael Jackson and the personal representatives of his
3 Estate, John Branca and John McClain (the "Executors"), hereby object to the subpoena served by
4 Wade Robson on Office of Santa Barbara District Attorney for records purportedly pertaining to
5 the Estate of Michael Jackson (the "Subpoena") on the following grounds: The Executors object to
6 the consumer notice served on "ESTATE OF MICHAEL JACKSON" as being defective on its
7 face in that it was served on a non-existent entity. It is well-established principle of American
8 jurisprudence that an estate of a decedent is not a legal entity with the capacity to be served with
9 process. "An estate is neither a person, natural or artificial, nor a legal entity, and cannot sue or be
10 sued. It is merely a name to indicate the sum total of the assets and liabilities of the decedent."
11 *Toledo v. Superior Court*, 19 Cal.App.3d 450, 454 (1971). See also *Blue Ridge Ins. Co. v.*
12 *Stanewich*, 142 F.3d 1145, 1150 (9th Cir. 1998); *F.D.I.C. v. Conner*, 20 F.3d 1376, 1383-84 (5th
13 Cir. 1994). Thus, the service of a consumer notice on "ESTATE OF MICHAEL JACKSON" is a
14 nullity. Without waiver of the foregoing objection, the Executors further state the following
15 objections. The Executors object to the Subpoena on the grounds that Wade Robson failed to
16 serve the requisite Consumer Notices on certain individuals whose personal information is being
17 sought, as required by Code of Civil Procedure sections 1985.3 and 1985.4. Persons who should
18 have been provided with consumer notices include, but are not limited to the alleged victims of the
19 criminal investigation and the legal guardians of Michael Jackson's minor children (who were
20 living at the property that was allegedly searched). The Executors further object to the Subpoena
21 on the grounds that it seeks materials that are the subject of a pending motion to quash filed by the
22 Executors in a related action in the Probate Court, Los Angeles Superior Court Case No. BP
23 117321. The Executors object to the Subpoena on the grounds that it is overbroad, burdensome,
24 oppressive and harassing. The Executors object in that character evidence and evidence of "prior
25 bad acts" are not relevant. The Executors object to the Subpoena on the grounds that the
26 Executors have not had the opportunity to review the materials sought in order to determine the
27 extent to which the documents involve materials protected by numerous privileges. Because of
28 that, the Executors object to the Subpoena to the extent it seeks information protected by the

1 attorney-client privilege, the work product doctrine, the physician-patient, psychotherapist-patient
2 privilege and other privileges or immunities from discovery. The Executors object to the
3 Subpoena on the grounds that it may include documents involving the fundamental privacy rights
4 of nonparties to the proceeding, including documents that may be protected by the physician-
5 patient, psychotherapist-patient and other privileges.

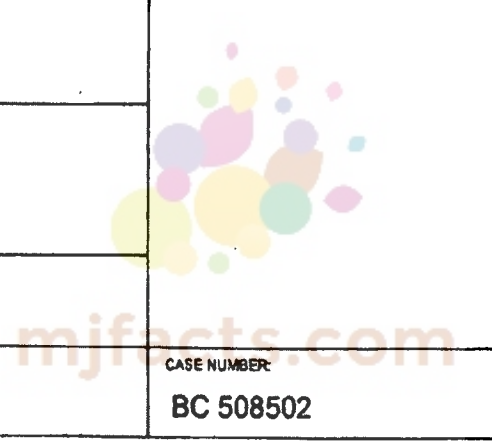
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mjfacts.com

mjfacts.com

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Maryann Marzano (#96867) Henry Gradstein (#89747) Matthew Slater (#259986) Gradstein and Marzano P.C. 6310 San Vicente Blvd, #510, Los Angeles, CA 90048 TELEPHONE NO.: 323-776-3100 FAX NO.: E-MAIL ADDRESS: mslater@gradstein.com ATTORNEY FOR (Name): Plaintiff Wade Robson		FOR COURT USE ONLY 
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90011 BRANCH NAME: Central District - Stanley Mosk		
PLAINTIFF/PETITIONER: Wade Robson DEFENDANT/RESPONDENT: Doe 1, et al.		
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS		CASE NUMBER: BC 508502

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
Office of the Santa Barbara District Attorney, See Attachment

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Matthew Slater	
On (date): June 16, 2014	At (time): 3:00pm
Location (address): 6310 San Vicente Blvd., #510, Los Angeles, CA 90048	
Do not release the requested records to the deposition officer prior to the date and time stated above.	

- a. ☐ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☒ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

See Attachment 3

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: **May 12, 2014**
Matthew Slater

(TYPE OR PRINT NAME)


 (SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for Claimant

(Proof of service on reverse)

(TITLE)

Page 1 of 2

PLAINTIFF/PETITIONER: Wade Robson	CASE NUMBER:
DEFENDANT/RESPONDENT: Doe 1, et al.	BC 508502

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: \$ _____

(2) ☐ Copying fees were paid.

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

07/08/2014

SHORT TITLE:

Wade Robson v. Doe 1, et al.

CASE NUMBER:

BC 508502

ATTACHMENT (Number): One

(This Attachment may be used with any Judicial Council form.)

Office of the Santa Barbara District Attorney
 1112 Santa Barbara Street
 Santa Barbara, CA 93101

c/o Office of County Council
 Clerk of the Board of Supervisors
 Attn: Kevin E. Ready, Sr., Esq.

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

mjfacts.com

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 3 of 3

(Add pages as required)

07/08/2014

1 **ATTACHMENT 3**

2 I.

3 **DEFINITIONS**

4 The following definitions are provided in the spirit of good faith and cooperation to assist
5 the responding party in responding to the Document Requests made by requesting party below.

6 1. The terms "DOCUMENT" or "DOCUMENTS" are used herein in the fullest and
7 most expansive sense and as used in California Code of Civil Procedure Section 2031.010(a), and
8 as defined in California Evidence Code Section 250, to include, but are not limited to, all
9 handwritten, printed, graphic, typed, electronically recorded, sound recorded or computer readable
10 materials, or other recorded or graphic matter of every type and description, however and by
11 whomever prepared, produced, reproduced, assimilated or made, in any form which is or was in
12 your actual or constructive possession, custody or control, whether the original, draft or any
13 carbon, photographic or other copy, reproduction or facsimile thereof, including, but not limited
14 to, any and all records, files, statements, interviews, investigative reports, writings, letters,
15 correspondence, bulletins, instructions, graphs, charts, diagrams, pictures, reports, memoranda,
16 notations of telephone or personal conversations or conferences, messages, transcripts,
17 agreements, interoffice communications, calendars, diaries, logs, notes, notebooks, drafts,
18 microfilm, discs, e-mails, summaries, reports, books, statistics, computer tapes or discs, audio
19 tapes, compact discs, DVDs, videotapes, cassette tapes, sound recordings, data compilations from
20 which information can be obtained or can be translated through detection devices into usable form,
21 or any other tangible thing. The terms "DOCUMENT" and "DOCUMENTS" shall also mean each
22 copy which is not identical to the original or to any identified copy, and all drafts and notes
23 (whether typewritten, handwritten or otherwise) made or prepared in connection with such
24 documents, whether used or not.

25 2. The term "COMMUNICATIONS" shall mean the transfer or exchange of any kind
26 or nature, whether orally, by DOCUMENT, telephone, facsimile, computer, e-mail, text or other
27 electronic transfer, personal delivery, or by any other means whatsoever.

07/08/2014

II.

INSTRUCTIONS

1. If a written or printed DOCUMENT also exists in electronic form, all forms of the DOCUMENT should be produced.

2. DOCUMENTS within the possession, care, custody or control of the Santa Barbara County Sheriff's Office and/or the Office of the Santa Barbara County District Attorney should be produced, including DOCUMENTS in the possession of attorneys, agents, investigators, consultants or experts. Without limiting the term "control" as used in the preceding sentence, a document is deemed to be within the control of the Santa Barbara County Sheriff's Office and/or the Office of the Santa Barbara County District Attorney, regardless of its physical location, if the responding party(ies) have the right to secure the document or a copy thereof from another person or entity, either public or private.

3. If a DOCUMENT was destroyed, lost, discarded or otherwise disposed of, please identify: (a) the subject matter of the DOCUMENT, (b) the date of its disposal, (c) the persons having knowledge of the circumstances under which it was disposed, and (d) the reason for its disposal.

4. If a DOCUMENT is withheld under a claim of privilege, list (a) the document request to which it is responsive; (b) its title and general subject matter; (c) its date; (d) the name(s) and title(s) of its authors or preparer; (e) the name(s) and title(s) of the person(s) for whom it was prepared and all persons to whom it was sent or shown; and (f) the nature of the privilege being claimed.

5. If a privilege is asserted only as to a portion of a DOCUMENT, the portion of the DOCUMENT as to which no privilege is being asserted should be produced. To the extent that a DOCUMENT or portion thereof is subject to a constitutional or other right of privacy privilege, requesting party is agreeable to having such privileged DOCUMENT or portion produced subject to a confidentiality agreement and [proposed] protective order to be entered in the above-captioned case of *Robson v. Doe I, et al.*, LASC Case No. BC508502 and/or the related probate action *Estate of Michael Joseph Jackson*, LASC Case No. BP117321. Such agreement shall

1 require that any party using such privileged DOCUMENT must do so in a manner that safeguards
2 those privacy rights, including the redaction of confidential information (such as social security
3 numbers, financial information, home addresses, telephone numbers and the like) in any public
4 filing, and the filing of any unredacted privileged DOCUMENT under seal.

5 6. Documents should be produced as TIF image files in an electronic
6 format. Specifically, the TIF images should be produced as a single-page Group IV TIF format
7 and accompanied by a Concordance Image load file (or other generally acceptable load file
8 format). The full extracted text (or OCR where not available) should be included and produced at
9 a document level. Metadata information should be produced in the Concordance DAT file format
10 or other mutually-acceptable format. The DAT file or other mutually agreeable format should
11 provide the following meta-data fields: custodian name, file name or subject line, original path or
12 inbox folder path, To, From, CC, BCC, create date, modify or sent date, beginning and ending
13 bates numbers, page count, and attachment range. Any electronic spreadsheets should be
14 produced in native format.

15 III.

16 DOCUMENT REQUESTS

17 1. Please produce all DOCUMENTS that constitute, refer or relate to any and all
18 reports related to the search executed of Neverland Ranch in Santa Barbara County.

07/08/2014

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 808 Wilshire Boulevard, 3rd Floor, Santa Monica, CA 90401.

On June 12, 2014, I served true copies of the following document(s) described as **OBJECTION BY NON-PARTY TO PRODUCE RECORDS** on the interested parties in this action as follows:

Henry Gradstein, Esq.
Maryann R. Marzano, Esq.
Gradstein & Marzano, P.C.
6310 San Vicente Boulevard, Suite 510
Los Angeles, CA 90048

Attorneys for Wade Robson
Tel: 323-302-9488
Fax: 323-931-4990
hgradstein@gradstein.com
mmarzano@gradstein.com

☐ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Kinsella Weitzman Iser Kump & Aldisert LLP's practice for collecting and processing correspondence for mailing. On the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

☒ **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a courtesy copy of the document(s) to be sent from e-mail address choffman@kwikalaw.com to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ **BY OVERNIGHT DELIVERY:** I enclosed said document(s) in an envelope or package provided by the overnight service carrier and addressed to the persons at the addresses listed above or on the attached Service List. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight service carrier or delivered such document(s) to a courier or driver authorized by the overnight service carrier to receive documents.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 12, 2014, at Santa Monica, California.


Candace Hoffman



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com



mjfacts.com

07/08/2014

GRADSTEIN & MARZANO

6310 SAN VICENTE BOULEVARD, SUITE 510 | LOS ANGELES, CALIFORNIA 90048 | PHONE: 323.776-3100 | FAX: 323.931.4990

June 24, 2014

VIA FIRST CLASS MAIL AND E-MAIL

Attn: Kevin E. Ready, Sr., Esq.
Senior Deputy County Counsel
County of Santa Barbara
c/o Clerk of the Board of Supervisors
105 East Anapamu Street, # 201
Santa Barbara, CA 93101
ready@co.santa-barbara.ca.us

mjfacts.com

Re: *Wade Robson v. Doe 1, etc., et al.*; LASC Case No. BC508502

Dear Mr. Ready:

Our firm issued and served Subpoenas in the above-entitled civil action for certain statements taken of witnesses interviewed in connection with the law enforcement investigation and trial of Michael Joseph Jackson by the Office of the Santa Barbara County District Attorney and the Santa Barbara County Sheriff's Department regarding the allegations of child sexual abuse of the minor child, Gavin Arvizo. In addition, those Subpoenas sought the production of all documents that constituted, referred or related to any and all reports related to the search executed of Neverland Ranch in Santa Barbara County.

We have received a copy of the letter and Objections sent by counsel for the Estate of Michael Jackson, MJJ Productions and MJJ Ventures dated June 12, 2014. The letter was sent on behalf of the Estate of Michael Jackson and its Executors. It not only misrepresents the record, but it purports to suggest that the Subpoenas are improper, which they are not. It further suggests that the pendency of a motion to quash filed in connection with a completely different set of Subpoenas served in a completely different case--the Probate action (Case No. BP 117321) somehow operates to preclude production of the documents sought in the above-referenced civil action. It does not.

Indeed, no motion to quash has been filed by anyone in connection with any of the following Subpoenas identified below:

1. The nine Subpoenas served on your office on May 23, 2014, in connection with the Probate action (Case No. BP117321), which sought witness statements taken in connection with the law enforcement investigation of Michael Joseph Jackson by the Office of the Santa Barbara County District Attorney, the Santa Barbara County Sheriff's Office, the Los Angeles County District Attorney and the Los Angeles Police Department regarding the allegations of child sexual abuse with the minor child Jordan Chandler. An additional two Subpoenas for the witness statements of Mariano Quindoy and Ofelia Quindoy taken during the Jordan Chandler investigation were served on your office on June 6, 2014.

HENRY GRADSTEIN | MARYANN R. MARZANO
hgradstein@gradstein.com | mmarzano@gradstein.com

07/08/2014

EXH-C

Kevin E. Ready, Sr., Esq.
Senior Deputy County Counsel
June 24, 2014

2. The nine Subpoenas served on your office on May 23, 2014, in connection with the Civil action (Case No. BC508502), which sought witness statements taken in connection with the law enforcement investigation of Michael Joseph Jackson by the Office of the Santa Barbara County District Attorney, the Santa Barbara County Sheriff's Office, the Los Angeles County District Attorney and the Los Angeles Police Department regarding the allegations of child sexual abuse with the minor child Jordan Chandler. An additional two Subpoenas for the witness statements of Mariano Quindoy and Ofelia Quindoy taken during the Jordan Chandler investigation were served on your office on June 6, 2014.

3. The thirty-seven Subpoenas served on your office on May 28, 2014, in connection with the Civil action (Case No. BC508502), which sought witness statements taken during the Gavin Arvizo investigation as well as the report related to the search of Neverland Ranch during that investigation. The Notice to Consumer for the Subpoena seeking the Neverland Ranch search report was sent to counsel for the Estate of Michael Jackson, and counsel returned its objection to this Subpoena, which was also sent to you in their letter of June 12, 2014. However, counsel did not make proper objections or a motion to quash in regard to any of the other Subpoenas mentioned herein.

Pursuant to California Code of Civil Procedure § 1985.3(g), in order for a motion to quash to have been timely made with respect to the above-referenced Subpoenas, the motion would have needed to be served upon both you and us at least five days prior to the date scheduled for production, which was June 16, 2014. No motions whatsoever have been served or filed, timely or otherwise, in connection with these Subpoenas.

Consequently, full production of the documents and materials sought pursuant to the above Subpoenas should be made forthwith.

We are happy to coordinate with you on the production, and can either arrange to pick up the responsive documents this week or arrange at our expense to have them sent from your office to ours via federal express as soon as possible. Thank you for your prompt attention to this matter.

Very truly yours,


Maryann R. Marzano, Esq.

MRM/ss

cc: Jonathan Steinsapir, Esq.

07/08/2014

Matt Slater

From: Jonathan Steinsapir <JSteinsapir@kwikalaw.com>
Sent: Wednesday, June 25, 2014 8:19 AM
To: Maryann Marzano; ready@co.santa-barbara.ca.us
Cc: Howard L. Weitzman; Henry Gradstein; Matt Slater; Aaron C. Liskin; jcohen@hswlaw.com
Subject: RE: Wade Robson v. Doe1, etc., et al.

Mr Ready:

As you know, we represent the Executors of the Estate of Michael Jackson ("the Executors"). In the referenced civil case (Robson v. Doe1), the Executors were served with consumer notices (erroneously named as "the Estate of Michael Jackson"). The Executors are not parties to the civil case. The Executors served timely objections to the subpoenas. Accordingly, and as I am sure you know, the subpoenaed parties (your clients) are barred from responding to the subpoenas absent a court order. Mr. Robson's counsel is simply wrong that we were required to file a motion to quash. The consumer notices themselves point this out. We have no doubt that you will abide by your obligations under the Code of Civil Procedure.

Furthermore, as to the subpoenas relating to searches of the home of the late Mr. Jackson, and as we have repeatedly pointed out to Mr. Robson's counsel, we understand that there were at least three persons (other than the late Mr. Jackson) living there at the time of the search, i.e., Mr. Jackson's minor children. They were not provided with consumer notices, as they quite obviously should have been. We do not represent those children and cannot speak for them. But, again, we trust that you will not violate their rights under state and federal law by releasing information relating to them without giving them the notice required by law. To the extent you believe any documents responsive to other subpoenas might contain information relating to these children, we assume you will not produce it unless and until they have appropriate notice under the Code. By this email, we would again point out to Mr. Robson's counsel (for the fourth time now) that the subpoenas they issued are defective for failing to provide notice to Mr. Jackson's children who obviously have an interest in documents relating to the search of their own home.

Please note that if you do decide to release documents in response to any subpoenas prior to a ruling on the motion to quash in the related probate matter, the Executors reserve all their rights.

Please feel free to contact me with any questions relating to this matter. I am out of the office through the end of this month so if you have any questions that need to be addressed this week, you can contact my associate Aaron Liskin, who is copied on this email.

Thank you.

Jonathan P. Steinsapir
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Boulevard, Third Floor
Santa Monica, California 90401
Direct Dial: 310.566.9834 | Direct Fax: 310.566.9884
Main Tel: 310.566.9800 | Main Fax: 310.566.9850
Email: jsteinsapir@kwikalaw.com

From: Maryann Marzano [<mailto:mmarzano@gradstein.com>]
Sent: Tuesday, June 24, 2014 1:34 PM

To: ready@co.santa-barbara.ca.us

Cc: Jonathan Steinsapir; Howard L. Weitzman; Henry Gradstein; Matt Slater

Subject: Wade Robson v. Doe1, etc., et al.

Dear Kevin:

Please see attached correspondence. Please advise as soon as possible when we can make arrangements to obtain the production.

Thank you,

Maryann Marzano

Maryann R. Marzano, Esq.

Partner

Gradstein & Marzano, P.C.

6310 San Vicente Boulevard, Suite 510

Los Angeles, California 90048

(323) 776-3100 | Cell: (310) 991-8924

Email: mmarzano@gradstein.com



Gradstein & Marzano

A Professional Corporation

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07/08/2014

Matt Slater

From: Jonathan Steinsapir <JSteinsapir@kwikalaw.com>
Sent: Wednesday, June 25, 2014 12:26 PM
To: Maryann Marzano
Cc: Kevin E. Ready Sr. Esq (ready@co.santa-barbara.ca.us); Howard L. Weitzman; Aaron C. Liskin; Henry Gradstein; Matt Slater; jcohen@hswlaw.com
Subject: Re: Wade Robson v. Doe 1, etc., et al.

Ms Marzano's statement that I "misrepresented" the Executors' rights are not only offensive but incorrect. I never that the Executors' objections applied to anything but the subpoena served for the search of the Mr Jackson's home.

Furthermore, Ms Marzano makes no attempt to justify her client's willful refusal to provide notice to parties who quite obviously should have been notified.

Maryann: if you want to talk to us about this, call us. Please do not accuse me of lying however.

On Jun 25, 2014, at 1:17 PM, "Maryann Marzano" <mmarzano@gradstein.com> wrote:

Dear Mr. Ready:

We wish to respond to the e-mail you received from Jonathan Steinsapir this morning regarding the outstanding Subpoenas in both the civil action, Wade Robson v. Doe 1, et al. (BC508502), and the probate matter, In re: the Estate of Michael Joseph Jackson (BP117321). Mr. Steinsapir's e-mail entirely misrepresents the scope of what the Estate is allowed to object to under the California Code of Civil Procedure – set forth below is the section of the Code regarding motions to quash and objections to subpoenas:

1985.3

(g) Any consumer whose personal records are sought by a subpoena duces tecum and who is a party to the civil action in which this subpoena duces tecum is served may, prior to the date for production, bring a motion under Section 1987.1 to quash or modify the subpoena duces tecum. Notice of the bringing of that motion shall be given to the witness and deposition officer at least five days prior to production. The failure to provide notice to the deposition officer shall not invalidate the motion to quash or modify the subpoena duces tecum but may be raised by the deposition officer as an affirmative defense in any action for liability for improper release of records.

Any other consumer or nonparty whose personal records are sought by a subpoena duces tecum may, prior to the date of production, serve on the subpoenaing party, the witness, and the deposition officer, a written objection that cites the specific grounds on which production of the personal records should be prohibited.

No witness or deposition officer shall be required to produce personal records after receipt of notice that the motion has been brought by a consumer, or after receipt of a written objection from a nonparty consumer, except upon order of the court in which the action is pending or by agreement of the parties, witnesses, and consumers affected.

In the civil action, the Estate was served with a Notice to Consumer for a Subpoena seeking the police report for the search of the Neverland Ranch executed in connection with the Gavin Arvizo investigation and criminal trial in 2005. In response, the Estate sent an objection to this Subpoena based partly on the grounds that it seeks the personal information of other parties (including Michael Jackson's minor children) who did not receive a Notice to Consumer. Although pursuant to the above Code section this objection may have been timely and proper as the Estate is a non-party to the civil action, this objection is **only** in regard to the Subpoena for the Neverland Ranch search report, and **does not** extend to any of the other Subpoenas served on your office for the witness statements taken in connection with the Gavin Arvizo and Jordan Chandler investigations. Mr. Steinsapir's email implies that the Estate's objection somehow "covers" the rest of these Subpoenas – as you can see from the above Code section, this is categorically incorrect. The Subpoenas for witness statements **seek the personal information** of non-parties to this action who **have no connection** to the Estate, and **the Estate has no legal grounds whatsoever** to object on behalf of these non-parties. Notices to Consumer for all of these Subpoenas were properly served on all of the witnesses whose statements were sought, and in response we only received two objections – accordingly, **neither of these two Subpoenas were served on your office.** Furthermore, the Estate's outstanding Motion to Quash (apart from being groundless) was made in the probate matter BP117321, and has absolutely no bearing on any Subpoenas issued in the civil action.

Accordingly, we reiterate that the Subpoenas for the witness statements are entirely proper, and production of these statements should be made forthwith. With regard to the Neverland Ranch search report subpoena, this may be withheld as the Estate has objected to it; we will, however, be seeking Court intervention in connection therewith and will duly serve you with a copy of our motion to compel.

Very truly yours,

Maryann Marzano

Maryann R. Marzano, Esq.

Partner

Gradstein & Marzano, P.C.

6310 San Vicente Boulevard, Suite 510

Los Angeles, California 90048

(323) 776-3100 | Cell: (310) 991-8924

Email: mmarzano@gradstein.com

<image001.png>

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Matt Slater

From: Maryann Marzano
Sent: Wednesday, June 25, 2014 1:52 PM
To: Jonathan Steinsapir
Cc: Kevin E. Ready Sr. Esq (ready@co.santa-barbara.ca.us); Howard L. Weitzman; Aaron C. Liskin; Henry Gradstein; Matt Slater; jcohen@hswlaw.com
Subject: RE: Wade Robson v. Doe 1, etc., et al.

Dear Jonathan:

To clarify, I was not accusing you of "lying", and nowhere in my e-mail will you find that word or any derivation thereof.

My statement that you were "misrepresenting" the scope of the objection was based upon your continued use of "subpoenas" instead of "subpoena" in your e-mail, and in the following sentence:

"Please note that if you do decide to release documents in response to any subpoenas prior to a ruling on the motion to quash in the related probate matter, the Executors reserve all their rights."

If you did not intend to include the rest of the civil action subpoenas in this sentence then you certainly did not make that point clear, and nowhere in your e-mail did you attempt to clarify that the Executors' objection applies ONLY to the subpoena for the Neverland Ranch search report. I was simply attempting to clarify the confusing record you created for Mr. Ready.

I am not in the habit of being disrespectful to any counsel, and I certainly do not plan to start now. Moving forward, and to avoid further misunderstanding, I think it best to keep between us and not involve Mr. Ready, as it is far from a productive use of his time.

Maryann

Maryann R. Marzano, Esq.
Partner
Gradstein & Marzano, P.C.
6310 San Vicente Boulevard, Suite 510
Los Angeles, California 90048
(323) 776-3100 | Cell: (310) 991-8924
Email: mmarzano@gradstein.com



Gradstein & Marzano

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From: Jonathan Steinsapir [mailto:JSteinsapir@kwikalaw.com]

Sent: Wednesday, June 25, 2014 12:26 PM

To: Maryann Marzano

Cc: Kevin E. Ready Sr. Esq (ready@co.santa-barbara.ca.us); Howard L. Weitzman; Aaron C. Liskin; Henry Gradstein; Matt Slater; jcohen@hswlaw.com

Subject: Re: Wade Robson v. Doe 1, etc., et al.

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Furthermore, Ms Marzano makes no attempt to justify her client's willful refusal to provide notice to parties who quite obviously should have been notified.

Maryann: if you want to talk to us about this, call us. Please do not accuse me of lying however.

On Jun 25, 2014, at 1:17 PM, "Maryann Marzano" <mmarzano@gradstein.com> wrote:

Dear Mr. Ready:

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1985.3

(g) Any consumer whose personal records are sought by a subpoena duces tecum and who is a party to the civil action in which this subpoena duces tecum is served may, prior to the date for production, bring a motion under Section 1987.1 to quash or modify the subpoena duces tecum. Notice of the bringing of that motion shall be given to the witness and deposition officer at least five days prior to production. The failure to provide notice to the deposition officer shall not invalidate the motion to quash or modify the subpoena duces tecum but may be raised by the deposition officer as an affirmative defense in any action for liability for improper release of records.

Any other consumer or nonparty whose personal records are sought by a subpoena duces tecum may, prior to the date of production, serve on the subpoenaing party, the witness, and the deposition officer, a written objection that cites the specific grounds on which production of the personal records should be prohibited.

No witness or deposition officer shall be required to produce personal records after receipt of notice that the motion has been brought by a consumer, or after receipt of a written objection from a nonparty consumer, except upon order of the court in which the action is pending or by agreement of the parties, witnesses, and consumers affected.

In the civil action, the Estate was served with a Notice to Consumer for a Subpoena seeking the police report for the search of the Neverland Ranch executed in connection with the Gavin Arvizo investigation and criminal trial in 2005. In response, the Estate sent an objection to this Subpoena based partly on the grounds that it seeks the personal information of other parties (including Michael Jackson's minor

children) who did not receive a Notice to Consumer. Although pursuant to the above Code section this objection may have been timely and proper as the Estate is a non-party to the civil action, this objection is **only** in regard to the Subpoena for the Neverland Ranch search report, and **does not** extend to any of the other Subpoenas served on your office for the witness statements taken in connection with the Gavin Arvizo and Jordan Chandler investigations. Mr. Steinsapir's email implies that the Estate's objection somehow "covers" the rest of these Subpoenas – as you can see from the above Code section, this is categorically incorrect. The Subpoenas for witness statements seek the personal information of non-parties to this action who have no connection to the Estate, and the Estate has **no legal grounds whatsoever** to object on behalf of these non-parties. Notices to Consumer for all of these Subpoenas were properly served on all of the witnesses whose statements were sought, and in response we only received two objections – accordingly, neither of these two Subpoenas were served on your office. Furthermore, the Estate's outstanding Motion to Quash (apart from being groundless) was made in the probate matter BP117321, and has absolutely no bearing on any Subpoenas issued in the civil action.

Accordingly, we reiterate that the Subpoenas for the witness statements are entirely proper, and production of these statements should be made forthwith. With regard to the Neverland Ranch search report subpoena, this may be withheld as the Estate has objected to it; we will, however, be seeking Court intervention in connection therewith and will duly serve you with a copy of our motion to compel.

Very truly yours,

Maryann Marzano

Maryann R. Marzano, Esq.

Partner

Gradstein & Marzano, P.C.

6310 San Vicente Boulevard, Suite 510

Los Angeles, California 90048

(323) 776-3100 | Cell: (310) 991-8924

Email: mmarzano@gradstein.com

<image001.png>

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07/08/2014

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PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 6310 San Vicente Boulevard, Suite 510, Los Angeles, California 90048-5418.

On July 7, 2014, I served the document described as
PLAINTIFF WADE ROBSON'S NOTICE OF MOTION AND MOTION TO COMPEL PRODUCTION OF DOCUMENTS REQUESTED PURSUANT TO SUBPOENA DUCES TECUM; AND DECLARATION OF MARYANN R. MARZANO IN SUPPORT THEREOF

on the interested parties to this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Howard Weitzman
Jonathan P. Steinsapir
KINSELLA WEITZMAN ISER KUMP &
ALDISERT
808 Wilshire Boulevard, 3rd Floor
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Counsel for the Executors of the Estate of
Michael Joseph Jackson

Counsel for the Executors of the Estate of
Michael Joseph Jackson

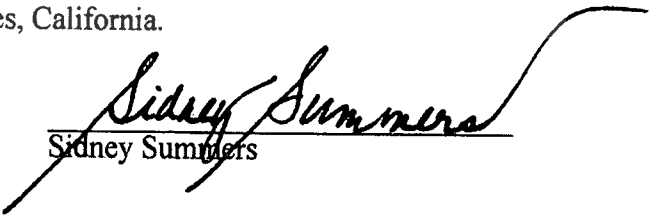
Kevin E. Ready, Esq.
Senior Deputy County Counsel
Office of County Counsel
105 E. Anapamu St, Suite 201
Santa Barbara CA 93101
Email: ready@countycounsel.com

BY REGULAR MAIL: I am readily familiar with the firm's practice for the collection and processing of correspondence, pleadings and notices for mailing. Under that practice it is deposited with the United States Postal Service that same day in the ordinary course of business with postage thereon fully prepaid at Los Angeles, California.

BY ELECTRONIC MAIL: I also transmitted a true and correct copy of the document by email as indicated above and no error was reported.

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

Executed July 7, 2014 at Los Angeles, California.


Sidney Summers

07/08/2014