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18 Attorneys for Defendant  
19 MICHAEL JOSEPH JACKSON

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA

JAN 18 2005

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

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

*REDACTED*

16 THE PEOPLE OF THE STATE OF  
17 CALIFORNIA,

18 Plaintiffs,

19 vs.

20 MICHAEL JOSEPH JACKSON,

21 Defendant.

) Case No. 1133603

) EX PARTE APPLICATION FOR AN  
) ORDER THAT MR. JACKSON BE  
) ALLOWED TO MAKE A PUBLIC  
) STATEMENT REGARDING  
) INFORMATION LEAKED TO THE  
) MEDIA; PROPOSED STATEMENT

) Honorable Rodney S. Mcville

) Date: TBA

) Time: TBA

) Dept: SM 8

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25 TO THE CLERK OF THE ABOVE ENTITLED COURT:

26 Defendant requests that the Court issue an order allowing Mr. Jackson to make a public  
27 statement regarding information that has recently been leaked to the press regarding the details of

28 EX PARTE APPLICATION FOR AN ORDER THAT MR. JACKSON BE ALLOWED TO MAKE A PUBLIC  
STATEMENT REGARDING INFORMATION LEAKED TO THE MEDIA

1 the prosecution's case. This request is based on the overriding interests of Mr. Jackson's rights to  
2 due process and a fair trial under the Fifth, Sixth and Fourteenth Amendments to the United States  
3 Constitution and Article I, Sections 1, 7, and 15 of the California Constitution.

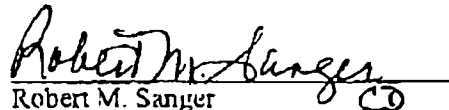
4 Dated: January 18, 2005

5 Respectfully submitted,

6 COLLINS, MESEREAU, REDDOCK & YU  
7 Thomas A. Mesereau, Jr.  
Susan C. Yu

8 SANGER & SWYSEN  
9 Robert M. Sanger

10 OXMAN & JAROSCAK  
11 Brian Oxman

12 By:   
13 Robert M. Sanger  
14 Attorneys for Defendant  
MICHAEL JOSEPH JACKSON

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EX PARTE APPLICATION FOR AN ORDER THAT MR. JACKSON BE ALLOWED TO MAKE A PUBLIC  
STATEMENT REGARDING INFORMATION LEAKED TO THE MEDIA

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I.

3 MR. JACKSON SHOULD BE ALLOWED TO MAKE A PUBLIC STATEMENT  
4 REGARDING THE INFORMATION THAT WAS RECENTLY LEAKED TO THE  
5 MEDIA

6 The content of the grand jury transcripts, as well as investigative reports, have been  
7 leaked to the media. ABC Television's Primetime Live recently aired portions of the grand jury  
8 transcripts and [www.thesnokingun.com](http://www.thesnokingun.com) recently published an account of the prosecution's  
9 case, based on police reports and grand jury transcripts, under the heading "The Predator." The  
10 disclosure of these prejudicial materials on the eve of trial threaten to deprive Mr. Jackson of his  
11 rights to due process and a fair trial under the Fifth, Sixth and Fourteenth Amendments to the  
12 United States Constitution and Article I, Sections 1, 7, and 15 of the California Constitution. As  
13 such, Mr. Jackson respectfully requests that he be allowed to make a public statement. A copy of  
14 the proposed statement is attached.

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28 EX PARTE APPLICATION FOR AN ORDER THAT MR. JACKSON BE ALLOWED TO MAKE A PUBLIC  
STATEMENT REGARDING INFORMATION LEAKED TO THE MEDIA

1 CONCLUSION

2 For the reasons stated above, Mr. Jackson requests that the Court issue an order allowing  
3 him to make the attached proposed public statement.


4 Dated: January 18, 2005

5 COLLINS, MESEREAU, REDDOCK & YU  
6 Thomas A. Mesereau, Jr.  
Susan C. Yu

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8 Robert M. Sanger

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Brian Oxman

10  
11 By:



12 Robert M. Sanger  
13 Attorneys for  
14 MICHAEL JOSEPH JACKSON  
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EX PARTE APPLICATION FOR AN ORDER THAT MR. JACKSON BE ALLOWED TO MAKE A PUBLIC  
STATEMENT REGARDING INFORMATION LEAKED TO THE MEDIA

STATEMENT OF MICHAEL JACKSON

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]