

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara
2 By: RONALD J. ZONEN (State Bar No. 85094)
Senior Deputy District Attorney
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Senior Deputy District Attorney
4 GERALD McC. FRANKLIN (State Bar No. 40171)
Senior Deputy District Attorney
5 1112 Santa Barbara Street
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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

JAN 31 2005

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

** Unsealed pursuant
to 6/16/05 Court
Order*

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SANTA BARBARA
10 SANTA MARIA DIVISION

RECEIVED
JAN 31 PM 3:27

12 THE PEOPLE OF THE STATE OF CALIFORNIA,

13 Plaintiff,

14 v.

15 MICHAEL JOE JACKSON,

16 Defendant.

No. 1133603

PLAINTIFF'S MOTION TO
EXCLUDE ANY REFERENCE BY
DEFENSE COUNSEL TO ANY
ALLEGED EXTRA-MARITAL
SEXUAL CONDUCT BY JANE
DOE

DATE: February 10, 2005
TIME: 8:30 a.m.
DEPT: TBA (Melville)

~~UNDER SEAL~~

19 TO: THE CLERK OF THE SUPERIOR COURT AND TO DEFENDANT AND HIS
20 COUNSEL:

21 PLEASE TAKE NOTICE that on February 10, 2005, Plaintiff will move the court
22 for its order forbidding counsel to inquire about or comment on Jane Doe's alleged "extra-
23 marital" sexual conduct during her prior marriage.
24

25 The motion will be based on this notice and the accompanying Memorandum of
26 Points and Authorities.

27 ////

28 ////

1 DATED: January 31, 2005

2 Respectfully submitted,

3 THOMAS W. SNEDDON, JR.
4 District Attorney

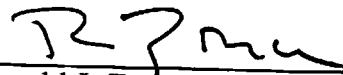
5 By: 
6 Ronal J. Zoren, Senior Deputy
7 Attorneys for Plaintiff

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1 “romantic affairs” and “manipulated other men [to] obtain their money and favors” unless and
2 until they make an offer of proof that any such carryings-on actually occurred and that it is
3 relevant to an issue properly before the court.

4 DATED: January 31, 2005

5 THOMAS W. SNEDDON, JR.
6 District Attorney

7 By: 
8 Ronald J. Zoden, Senior Deputy

9 Attorneys for Plaintiff

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1 **PROOF OF SERVICE**

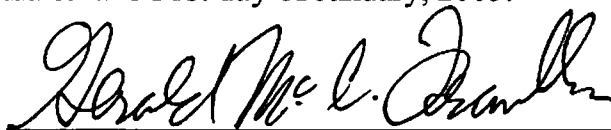
2
3 STATE OF CALIFORNIA)
4 COUNTY OF SANTA BARBARA) SS

5
6 I am a citizen of the United States and a resident of the County aforesaid; I am over
7 the age of eighteen years and I am not a party to the within-entitled action. My business
8 address is: District Attorney's Office; Courthouse; 1112 Santa Barbara Street, Santa Barbara,
9 California 93101.

10 On January 31, 2005, I served the within PLAINTIFF'S MOTION TO EXCLUDE
11 ANY REFERENCE BY DEFENSE COUNSEL TO ANY ALLEGED EXTRA-MARITAL
12 SEXUAL CONDUCT BY JANE DOE on Defendant, by THOMAS A. MESEREAU, JR.,
13 ROBERT SANGER and BRIAN OXMAN, by personally delivering a true copy thereof to the
14 attorney representing Defendant in the jury selection proceedings in court.

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed at Santa Maria, California on this 31st day of January, 2005.

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SERVICE LIST

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FAX: [CONFIDENTIAL]

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Co-counsel for Defendant

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Santa Fe Springs, CA 90670

Co-counsel for Defendant