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County of Santa Barbara
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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

APR 02 2004

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

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

11 THE PEOPLE OF THE STATE OF CALIFORNIA,) No. 1133603
12) Plaintiff,)
13 v.)
14 MICHAEL JOE JACKSON,)
15) Defendant.)
16) JOINT REQUEST FOR ORDER
DIRECTING THE SHERIFF TO
17 LODGE CERTAIN ITEMS OF
PROPERTY SEIZED PURSUANT
TO WARRANT FOR SEARCH
OF BRADLEY MILLER'S
OFFICE AND NEVERLAND
RANCH; ORDER THEREON

18 Certain property was seized in the name of the People of the State of California on
19 November 18, 2003 from the office of Bradley Miller at [REDACTED]
20 Beverly Hills, California in obedience to search warrant bearing number SW 8844686. At the
21 time of the search of Mr. Miller's office, Daniel Nixon, an attorney, orally asserted the
22 "lawyer-client" and "work-product" privileges as to the property in that office. Much of that
23 property was lodged with the court, by court order, on January 22, 2004.

24 On November 18, 2003, certain property was seized at Neverland Ranch in
25 obedience to a search warrant. Defendant's counsel has informally identified three items of the
26 property seized at Neverland Ranch as to which he believes the lawyer-client and attorney
27 work-product privileges apply.

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1 This joint request seeks an order directing the Sheriff of Santa Barbara to lodge with
2 the Court the remaining items of property seized from Investigator Miller's office (i.e., item
3 nos. 821 through 826 as listed in Sheriff's Department Property Form re: property seized at
4 [REDACTED] Beverly Hills, in Case No. 03-5670) and those items seized from
5 Neverland Ranch and identified by Attorney Geragos as privileged (i.e., items nos. 312, 318
6 and 328 as listed in Sheriff's Department Property Form re: property seized at Neverland
7 Ranch, in Case No. 03-5670).

8 This request is made jointly by the District Attorney, counsel for Plaintiff, Mark
9 Geragos, Esq., counsel for Defendant, and Daniel Nixon, Esq., Investigator Miller's counsel.

10 Defendant's counsel represents he will formally assert either the lawyer-client
11 privilege, the attorney work-product privilege, or both, as to the above-listed property when his
12 examination of his copies of certain of that evidence has been completed, for hearing on a date
13 to be determined.

14 To that end, the District Attorney and Attorneys Mark Geragos and Daniel Nixon
15 respectfully request an order directing the Sheriff of Santa Barbara County to lodge with the
16 court all the property listed as Items 312, 318, 328 and 821 through 826 on the Sheriff's
17 "Property Form" in Sheriff's Case No. 03-5670, dated November 18, 2003.

18 DATED: March 25, 2004

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20 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara

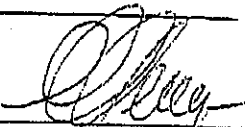
21 By: Gerald McC. Franklin
22 Gerald McC. Franklin, Senior Deputy
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24 Attorneys for Plaintiff

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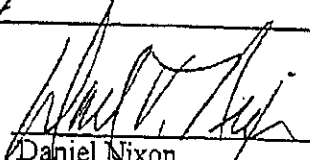
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DATED: 3/27/04



Mark J. Geragos
Attorney for Defendant

DATED: 3/26/04



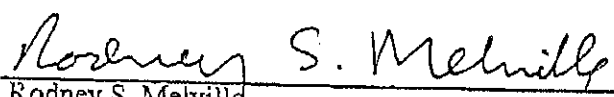
Daniel Nixon
Attorney for Bradley Miller

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ORDER

At the joint request of the parties, and good cause appearing, the Sheriff of Santa Barbara is ordered forthwith to deliver to and lodge with the Clerk of the Court that certain property seized on November 18, 2003 from the offices of Bradley Miller in Beverly Hills, California in obedience to warrant and listed as Items 821 through 826 on the Sheriff's "Property Form" in Sheriff's Case No. 03-5670, dated November 18, 2003, and that certain property seized on November 18, 2003 from Neverland Ranch in Los Olivos, California pursuant to warrant and listed as Items 312, 318 and 328 on the Sheriff's "Property Form" in the same case.

DATED: APR 02, 2004


Rodney S. Melville
Judge of the Superior Court