

1 Thomas A. Mesereau, Jr. (SBN 91182)
Susan C. Yu (SBN 195640)
2 COLLINS, MESEREAU, REDDOCK & YU, LLP
1875 Century Park East, 7TH Floor
3 Los Angeles, California 90067
Tel: (310) 284-3120; Fax: (310) 284-3133

4 Robert M. Sanger (SBN 58214)
5 SANGER & SWYSEN
233 E. Carrillo St., Suite C
6 Santa Barbara, CA 93101
Tel: (805) 962-4887; Fax: (805) 963-7311
7

8 Attorneys for Defendant
MICHAEL JOE JACKSON
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF SANTA BARBARA
12 SANTA MARIA DIVISION

13 THE PEOPLE OF THE STATE OF
CALIFORNIA,

14 Plaintiff,

15 vs.

16 MICHAEL JOE JACKSON

17 Defendant.
18

) CASE NO. 1133603
)
) *EX PARTE* APPLICATION TO FILE UNDER
) SEAL: (1) SUPPLEMENTAL REQUEST FOR
) ATTENDANCE OF OUT-OF-STATE
) WITNESS (PEN. CODE § 1334); AND (2)
) CERTIFICATE OF REQUESTING STATE
) FOR ATTENDANCE OF WITNESS
) LOCATED OUTSIDE; [PROPOSED] ORDER
)
) HEARING: NOT REQUIRED
)
) DATE: N/A
) TIME: N/A
) Place: Dept. SM-2
)
)
)
)

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

MAY - 3 2005

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

EX PARTE APPLICATION TO FILE UNDER SEAL: (1) SUPPLEMENTAL REQUEST FOR
ATTENDANCE OF OUT-OF-STATE WITNESS (PEN. CODE § 1334); AND (2) CERTIFICATE
OF REQUESTING STATE FOR ATTENDANCE OF WITNESS LOCATED OUTSIDE; [PROPOSED] ORDER

1 Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies *ex parte* for
2 leave to file under seal: (1) supplemental request for attendance of out-of-state witness
3 (Pen. Code § 1334) ("Request"); and (2) certificate of requesting state for attendance of
4 witness located outside ("Certificate").

5 This Request is made to protect the witness from being unduly harassed and to
6 preserve Mr. Jackson's constitutional rights to a fair trial, due process of law, a fair and
7 impartial jury, the effective assistance of counsel, and to equal protection of the laws and
8 the privileges and immunities guaranteed by the 4th, 5th, 6th and 14th Amendments to
9 the United States Constitution and Article I of the California Constitution. Accordingly,
10 Mr. Jackson respectfully requests that the Court not release the unredacted version of the
11 Request and the Certificate until the witness is served. The defense will promptly notify
12 the Court when so served. Until then, the defense requests that the Court release only the
13 redacted version, concurrently filed herewith.

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

16 Dated: May 3, 2005

Respectfully submitted,

18 COLLINS, MESEREAU, REDDOCK & YU
19 Thomas A. Mesereau, Jr.
Susan C. Yu

20 SANGER & SWYSEN
Robert M. Sanger

21 By:


22 Susan C. Yu

23 Attorneys for MICHAEL JOE JACKSON

