



1 may deem just and proper. This request is based on the overriding interests of Mr. Jackson's rights  
2 to 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: July 30, 2004

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  
15 MICHAEL JOSEPH JACKSON  
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1 United States Constitution and Article I, Sections 1, 7, and 15 of the California Constitution.  
2 Material contained the accompanying document pertains to evidence and the testimony of  
3 witnesses that, if made public, would compromise Mr. Jackson's these rights and would result in  
4 prejudice to Mr. Jackson. In order to protect these overriding interests, it is necessary that the  
5 accompanying document be filed under seal.

6 **CONCLUSION**

7 For the reasons stated above, Mr. Jackson requests that the Court issue an order that the  
8 accompanying STATUS REPORT and accompanying documents, be filed under seal.

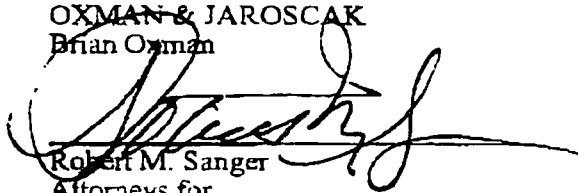
9 Dated: July 30, 2004

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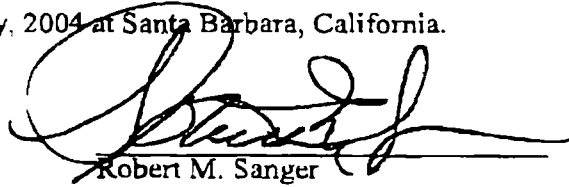
DECLARATION OF ROBERT M. SANGER

I, Robert Sanger, declare:

1. I am an attorney at law duly licensed to practice law in the courts of the State of California, a partner in the law firm of Sanger & Swysen, and co-counsel for Michael Jackson.

2. It is necessary that the accompanying STATUS REPORT and accompanying documents, be filed under seal in order to protect the overriding interests of Mr. Jackson's rights to due process and a fair trial, as well as to prevent the disclosure of witnesses, potential witnesses and potential evidence.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 30<sup>th</sup> day of July, 2004 at Santa Barbara, California.



Robert M. Sanger