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 13

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 15 FOR THE COUNTY OF SANTA BARBARA
 16 SANTA MARIA DIVISION
 17

18 THE PEOPLE OF THE STATE OF
 CALIFORNIA,

19 Plaintiff,

20 vs.

21 MICHAEL JOSEPH JACKSON

22 Defendant.
 23

CASE NO. 1133603

**EX PARTE APPLICATION FOR
 LEAVE TO FILE UNDER SEAL
 MR. JACKSON'S MOTION TO
 COMPEL DISCOVERY;
 DECLARATION OF ROBERT
 SANGER; PROPOSED ORDER**

~~FILED UNDER SEAL~~

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 26 Defendant Michael J. Jackson, through his counsel, hereby applies ex parte for
 27 leave to file under seal his motion to compel discovery. Filing under seal is
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necessary because the content of the motion includes reference to details in under seal material, including discovery materials.

This application is based upon the attached declaration of Robert M. Sanger, the file and record in this case and any other information presented prior to a ruling hereon.

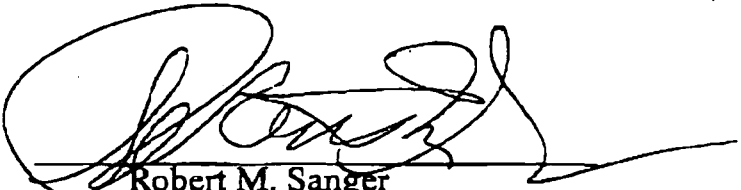
Dated: September 3, 2004

Respectfully submitted,

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

Robert M. Sanger
SANGER & SWYSEN

Brian Oxman
OXMAN & JAROSCAK

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

DECLARATION OF ROBERT M. SANGER

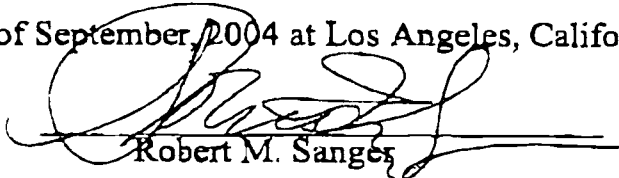
I, Robert M. Sanger, declare as follows:

1. I am an attorney duly authorized to practice before all courts of the State of California and co-counsel for Michael J. Jackson. I submit this declaration in support of an ex parte application for leave to file under seal Mr. Jackson's motion to compel discovery.

2. The motion papers describe materials that have been maintained under seal by this Court. Details about the investigation and other discovery are mentioned in the moving papers. Therefore, in accordance with the practice directed by this Court, leave is sought to file this motion under seal.

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

Executed this 3rd day of September, 2004 at Los Angeles, California.


Robert M. Sanger