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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

SEP 16 2004

4 **KATTEN MUCHIN ZAVIS ROSENMAN**
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CARRIE L. WAGNER, Deputy Clerk

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* Unsealed pursuant
to 6/16/05 Court's
order

14 Attorneys for Defendant
MICHAEL JOSEPH JACKSON

15
16 SUPERIOR COURT OF THE STATE OF CALIFORNIA
17 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION
18

19 THE PEOPLE OF THE STATE OF
CALIFORNIA,

20 Plaintiffs,

21 vs.

22 MICHAEL JOSEPH JACKSON,

23 Defendant.
24
25
26
27
28

Case No. 1133603

EMERGENCY APPLICATION FOR AN
ORDER DIRECTING THAT MATERIALS
SEIZED FROM SEARCH WARRANT
NUMBER 5135 BE SEALED AND THAT
THE PROVISIONS OF PENAL CODE
SECTION 1524(C) BE IMPLEMENTED;
DECLARATION OF ROBERT M. SANGER;
[PROPOSED] ORDER

UNDER SEAL

Honorable Rodney S. Melville
Date: September 17, 2004
Time: 1:00 pm
Dept: SM 8

EMERGENCY APPLICATION

1 TO THE CLERK OF THE ABOVE ENTITLED COURT;

2 Defendant requests that the Court issue an order directing that all items seized from [REDACTED]
3 [REDACTED] California, the residence of Mr. Jackson's personal assistant,
4 Evvy Tavasci, on September 15, 2004, be sealed and that the provisions of California Penal Code
5 Section 1524(o) be implemented, and such other and further relief as the court might deem just and
6 proper, on the grounds that the materials seized are protected by the attorney-client privilege, the
7 attorney work product doctrine, and the right of Mr. Jackson to communicate with counsel to prepare
8 his defense. Mr. Jackson reserves the right to make other motions regarding these particular items
9 and the search in general. This application is based on this application, the Memorandum of Points
10 and Authorities and Declaration of Robert M. Sanger filed concurrently herewith as well as all
11 papers, records and files herein and such supplemental and further papers, exhibits and evidence as
12 may be filed hereafter and as may be adduced at the hearing on this application.

13 Dated: September 16, 2004

14 Respectfully submitted,

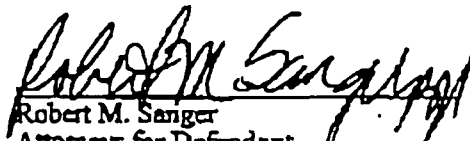
15 COLLINS, MESEREAU, REDDOCK & YU
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18 Steve Cochran
Stacey McKee Knight

19 SANGER & SWYSEN
20 Robert M. Sanger

21 OXMAN & JAROSCAK
22 Brian Oxman

23 By:

24 
25 Robert M. Sanger
26 Attorneys for Defendant
27 MICHAEL JOSEPH JACKSON
28

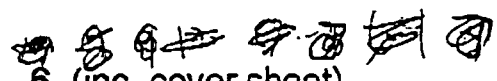
EMERGENCY APPLICATION

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA
SANTA MARIA CIVIL DIVISION
312 E. COOK STREET
SANTA MARIA, CA 93454

(805) 346-7414 Phone
(805) 346-7591 Fax (Criminal/Traffic)
(805) 346-7616 Fax (Admin/Civil/Small Claims)

FAX TRANSMITTAL SHEET

4

DATE: 6-20-06 TOTAL PAGES: 6 (inc. cover sheet) 

TO: Samantha OR Gary

DEPT: Superior Court Admin.

FAX # x3137 or x2219 or x3582

SENT BY: Carrie Wagner for Judge Melville PHONE #: 346-7678

SPECIAL INSTRUCTIONS:

People v. Jackson for internet posting. Please check it asap for any "bad" pages and let me know asap!

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1 Exhibit #73B: Letter to victim's family's landlady

2 Exhibit #73C: Envelope to victim's family's Landlady

3 Exhibit #80: Passport applications

4 Exhibit #82: Note left by private investigator at victim's apartment


5 Exhibit #91: Brashcars video with documentation

6
7 A photograph or copy of each exhibit released will be lodged with the court at the
8 time of release pursuant to Penal Code Section 1417.2. The Santa Barbara Sheriff's
9 Office will make arrangements for the defense to view these exhibits should they wish to
10 do so during the time the exhibits are in the custody of the Sheriff. If forensic
11 examination of a given exhibit will consume or alter that exhibit to the extent that further
12 forensic examination by the defense is rendered impossible, the Sheriff will notify the
13 defense of that fact and, at the request of the defense, allow the defense a reasonable time
14 to apply to the Court for such further order as the Court may deem appropriate. All
15 exhibits will be returned to the court's custody upon completion of necessary forensic
16 analysis.

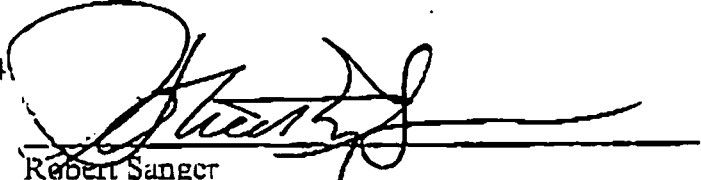
17 This stipulation shall in no way effect the admissibility of such exhibits.

18 DATED: September 24, 2004

19
20 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara

21 By: 
22 GORDON AUCHINCLOSS
23 Deputy District Attorney
24 Attorney for Plaintiff

25 DATED: September 24, 2004

26
27 
28 Robert Sanger
Attorney for defendant