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14 Attorneys for Defendant  
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15

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

19 THE PEOPLE OF THE STATE OF  
CALIFORNIA,

20 Plaintiff,

21 vs.

22 MICHAEL JOE JACKSON

23 Defendant.  
24

) CASE NO. 1133603

) ~~PROPOSED~~ REDACTED VERSION OF  
) THOMAS A. MESEREAU, JR.'S REQUEST  
) TO MAKE A PUBLIC STATEMENT

) FILED UNDER SEAL & BY FAX

) HEARING:

) DATE: SEPTEMBER 21, 2004  
) TIME: 9:30 A.M.  
) Place: Dept. SM-2

**FILED**  
SUPERIOR COURT of CALIFORNIA  
COUNTY of SANTA BARBARA

SEP 21 2004

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

1 On behalf of Mr. Michael J. Jackson ("Mr. Jackson"), lead counsel, Thomas A.  
2 Mesereau, Jr., respectfully requests that the Court permit him to make a public statement,  
3 which is attached hereto as Exhibit A. This statement has been prepared so as to avoid  
4 issues of concern in this criminal matter.

5 The defense learned yesterday that false and inflammatory story is circulating  
6 throughout the media regarding photographs allegedly seized from Mr. Jackson's  
7 residence.

8  
9 These articles are designed to spread falsehoods about Mr. Jackson and the  
10 evidence in this case. They are highly prejudicial to Mr. Jackson because they inflame the  
11 public and poison the jury pool. Accordingly, Mr. Mesereau respectfully requests the  
12 Court to permit him to respond to these falsehoods. The attached proposed statement is  
13 short, concise and consistent with the spirit and letter of this  
14 Court's Protective Order.

15 DATED: September 21, 2004

Respectfully submitted,


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

18 Steve Cochran  
19 Stacey McGee Knight  
KATTEN MUCHIN ZAVIS ROSENMAN

20 Robert M. Sanger  
SANGER & SWYSEN

21 Brian Oxman  
22 OXMAN & JAROSCAK

23 By:

24   
Thomas A. Mesereau, Jr.  
25 Attorneys for Mr. MICHAEL J. JACKSON  
26

27 A proposed Redacted version of Mr. Mesereau's Request to Make a Public statement is  
28 concurrently filed herewith.

**EXHIBIT'S A & B  
EXCLUDED**

1 PROOF OF SERVICE

2 I, the undersigned, declare:

3 I am a citizen of the United States of America, am over the age of eighteen (18)  
4 years, and not a party to the within action. I am employed at 1875 Century Park East, 7<sup>th</sup>  
Floor, Los Angeles, CA 90067. On August 13, 2004, I served the following document:

5 **[PROPOSED] REDACTED VERSION OF THOMAS A. MESEREAU, JR.'S REQUEST TO  
6 MAKE A PUBLIC STATEMENT**

7 on the interested parties addressed as follows:

8 Thomas Sneddon, Esq., District Attorney  
9 Gerald Franklin, Esq.  
10 Ronald Zonen, Esq.  
11 Gordon Auchincloss, Esq.  
12 District Attorney's Office  
13 1105 Santa Barbara Street  
14 Santa Barbara, CA 93108  
15 FAX: (805) 568-2398

16      BY MAIL: I placed each envelope, containing the foregoing document, with postage  
17 fully prepaid, in the United States mail at Los Angeles, California. I am readily familiar  
18 with the business practice for collection and processing of mail in this office; that in the  
19 ordinary course of business said document would be deposited with the US Postal Service  
20 in Los Angeles on that same day.

21   X   BY FACSIMILE: I served a copy of the within document on the above-interested  
22 parties, by way of a facsimile, at the facsimile numbers listed above.

23      BY MESSENGER/ATTORNEY SERVICE: I caused \_\_\_\_\_ to personally serve the  
24 within document on the above interested parties.

25   X   (State) I declare under penalty of perjury under the laws of the State of California  
26 that the foregoing is true and correct.

27      (Federal) I declare that I am employed in the office of a member of the bar of this  
28 court at whose direction the service was made.

Executed on September 21, 2004, at Los Angeles, California.

22   
23 \_\_\_\_\_  
24 Susan C. Yu