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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**

~~FILED UNDER SEAL~~

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25  
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  
28

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

OCT 04 2004

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

1 necessary because the content of the motion includes reference to details in under  
2 seal material about the investigation, including discovery materials.

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

6 Dated: October 4, 2004

Respectfully submitted,

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

10 Robert M. Sanger  
11 SANGER & SWYSEN

12 Brian Oxman  
13 OXMAN & JAROSCAK

14 By: 

15 Robert M. Sanger  
16 Attorneys for Defendant  
17 MICHAEL JOSEPH JACKSON  
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1 **DECLARATION OF ROBERT M. SANGER**

2 I, Robert M. Sanger, declare as follows:

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

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

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

12 Executed this 4th day of October, 2004 at Los Angeles, California.

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14 Robert M. Sanger  
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