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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

OCT 12 2004

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

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

16 THE PEOPLE OF THE STATE OF
CALIFORNIA,

17 Plaintiff,

18 vs.

19 MICHAEL JOE JACKSON

20 Defendant.

) CASE NO. 1133603

) EX PARTE APPLICATION TO FILE UNDER
) SEAL MR. JACKSON'S REPLY TO
) PROSECUTION'S RESPONSE TO
) INFORMANT MOTION; ~~[PROPOSED]~~-
) ORDER

) [REPLY BRIEF TO THE PROSECUTION'S RESPONSE TO
) THE INFORMANT MOTION FILED CONCURRENTLY
) HEREWITH]

) ~~FILED UNDER SEAL & BY FAX~~

) HEARING:

) DATE: OCTOBER 14, 2004

) TIME: 8:30 A.M.

) Place: Dept. SM-2

1 Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies *ex parte* for
2 leave to file under seal his Reply Brief to the Prosecution's Response to the Informant
3 Motion. The Reply Brief contains references to matters that are subject to this Court's
4 Protective Order and thus must be filed under seal until the Court orders otherwise.

5 This application is based upon the attached declaration of Susan C. Yu the files and
6 record in this case and any other information presented prior to a ruling hereon.

7 Dated: October 11, 2004

Respectfully submitted,

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

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11 SANGER & SWYSEN
Robert M. Sanger

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13 OXMAN & JAROSCAK
Brian Oxman

14 By:


15 Susan C. Yu
Attorneys for MICHAEL JOE JACKSON

DECLARATION OF SUSAN C. YU

I, Susan C. Yu 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 Collins, Mesereau, Reddock & Yu, and co-counsel for Mr. Michael Jackson in this criminal proceeding. I submit this declaration in support of an *ex parte* application for leave to file under seal Mr. Jackson's Reply Brief to the Prosecution's Response to the Informant Motion.

2. The Reply Brief contains materials that are subject to this Court's Protective Order. Therefore, in accordance with this Court's directives, leave is sought to file this Reply Brief under seal.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12th day of October, 2004 at Los Angeles, California.


Susan C. Yu