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7
8 Attorneys for Raymond Chandler

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 IN AND FOR THE COUNTY OF SANTA BARBARA
12 COOK DIVISION

13
14 THE PEOPLE OF THE STATE OF CALIFORNIA,)
15 Plaintiff,)
16 vs.)
17 MICHAEL JACKSON,)
18 Defendant.)

Case No.: 1183603

VERIFIED OBJECTIONS BY NON PARTY
RAYMOND CHANDLER TO DEFENDANT'S
SUBPOENA DUCES TECUM

[Assigned for All Purposes to the Honorable
Rodney S. Melville]

Hearing Date: November 4, 2004
Time: 8:30 AM
Dept.: SM-2

22
23 REQUEST NO. 1:

24 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning Jordan
25 Chandler's relationship with Michael Jackson since January 1, 1992.

26 RESPONSE TO REQUEST NO. 1:

27 Raymond Chandler objects to producing these documents on the grounds that: (a) the request is
28 overbroad and burdensome in that the majority of these documents - numbering in the hundreds of

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

OCT 25 ^{ED} 2004

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

*Unsealed purs.
6116105 Court
Order*

FILED UNDER SEAL
Carrie L. Wagner

1 pages – are newspaper and magazine articles and court pleadings; (b) these documents are public
2 documents readily available to the defendant; (c) to the extent that any of these documents are
3 unpublished they are protected from compelled production by the journalists shield law.

4 To the extent that these documents are not newspaper or magazine articles or court pleadings
5 readily available to the defendant, and are not protected from compelled production by the journalists
6 shield law, production will be allowed subject to this Court's ruling on the Motion to Quash filed
7 concurrently with these Objections and this Court's in camera review of the documents.

8 REQUEST NO. 2:

9 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any contract,
10 consulting agreement, joint venture agreement, employment relationship, or services arrangement
11 between you and Tellem Worldwide.

12 RESPONSE TO REQUEST NO. 2:

13 Raymond Chandler objects to producing these documents on the grounds that the documents
14 requested are irrelevant to the issues in this case.

15 Notwithstanding said objections, Raymond Chandler is unable to comply with Request No. 2
16 because no such documents have ever existed. A diligent search and reasonable inquiry has been made
17 in an effort to comply with this demand.

18 REQUEST NO. 3:

19 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any
20 communications, correspondence, notes, letters, memoranda, or discussion between you and Tellem
21 Worldwide since January 1, 1992, or any of their REPRESENTATIVES.

22 RESPONSE TO REQUEST NO. 3:

23 Raymond Chandler objects to producing these documents on the grounds that (a) the documents
24 requested are irrelevant to the issues in this case and (b) will not reasonably lead to the discovery of
25 admissible evidence.

26 Notwithstanding said objections, Raymond Chandler is unable to comply with Request No. 3
27 because no such documents have ever existed. A diligent search and reasonable inquiry has been made
28 in an effort to comply with this demand.

1 REQUEST NO. 4:

2 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any
3 communication, correspondence, notes, letters, or memoranda, or discussion between you and any
4 person, business, or other entity since January 1, 1992, where Michael Jackson has been mentioned or
5 discussed.

6 RESPONSE TO REQUEST NO. 4:

7 Raymond Chandler objects to producing these documents on the grounds that: (a) the request is
8 overbroad and burdensome; (b) are an invasion of privacy; (c) to the extent that any of these documents
9 are unpublished they are protected from compelled production by the journalists shield law; and (d) will
10 not reasonably lead to the discovery of admissible evidence.

11 REQUEST NO. 5:

12 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any
13 communication, correspondence, notes, letters, or memoranda, or discussion between you and any law
14 enforcement agency, governmental entity, police personnel, sheriff's personnel, child protective services
15 personnel, or any of their REPRESENTATIVES, whether federal, state, or local, since January 1, 1992,
16 where Michael Jackson or Jordan Chandler has been mentioned or discussed.

17 RESPONSE TO REQUEST NO. 5:

18 Raymond Chandler objects to producing these documents on the grounds that they are not
19 relevant to the subject matter at hand in that none of these documents contain any information regarding
20 any claims of child molestation or defenses to such claims.

21 REQUEST NO. 6:

22 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any
23 compensation, payment, expense reimbursement, cancelled checks or other evidence of payment, for
24 any speech, writing, manuscript, book, performance, consultation service, work, labor, or other
25 assistance you have provided to any person where the subject matter of Michael Jackson or Jordan
26 Chandler was discussed, mentioned, or involved.

27 ///

28 ///

1 RESPONSE TO REQUEST NO. 6:

2 Raymond Chandler objects to producing these documents on the grounds that: (a) the request is
3 overbroad and burdensome; (b) are an invasion of privacy; (c) are irrelevant to the issues in this case;
4 and (d) will not reasonably lead to the discovery of admissible evidence.

5 Raymond Chandler is unable to comply with Request No. 6 because no such documents have
6 ever existed. A diligent search and reasonable inquiry has been made in an effort to comply with this
7 demand.

8 REQUEST NO. 7:

9 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any
10 discussions, letters, notes, communications, contracts, agreements, or correspondence between you and
11 Jordan Chandler, or any of his REPRESENTATIVES, where the subject of Michael Jackson was
12 discussed or mentioned since January 1, 1992.

13 RESPONSE TO REQUEST NO. 7:

14 Raymond Chandler objects to producing these documents on the grounds that: (a) the request is
15 overbroad and burdensome; (b) are an invasion of privacy; (c) to the extent that any of these documents
16 are unpublished they are protected from compelled production by the journalists shield law; and (d) will
17 not reasonably lead to the discovery of admissible evidence.

18 Raymond Chandler is unable to comply with Request No. 7 because no such documents have
19 ever existed. A diligent search and reasonable inquiry has been made in an effort to comply with this
20 demand.

21 REQUEST NO. 8:

22 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any
23 discussions, letters, notes, communications, contracts, agreements, or correspondence between you and
24 Evan Chandler, or any of his REPRESENTATIVES, where the subject of Michael Jackson or Jordan
25 Chandler was discussed or mentioned since January 1, 1992.

26 RESPONSE TO REQUEST NO. 8:

27 Raymond Chandler objects to producing these documents on the grounds that: (a) the request is
28 overbroad and burdensome; (b) are an invasion of privacy; (c) to the extent that any of these documents

1 are unpublished they are protected from compelled production by the journalists shield law; and (d) will
2 not reasonably lead to the discovery of admissible evidence.

3 REQUEST NO. 9:

4 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning manuscripts,
5 manuscript, drafts, research notes, interview notes, interview audio and video recordings,
6 correspondence with witnesses, and discussions with witnesses concerning or relating to the book "All
7 that Glitters: The Crime and the Cover Up" by Raymond Chandler.

8 RESPONSE TO REQUEST NO. 9:

9 Raymond Chandler objects to producing these documents on the grounds that: (a) the request is
10 overbroad and burdensome; (b) are an invasion of privacy; (c) to the extent that any of these documents
11 are unpublished they are protected from compelled production by the journalists shield law; and (d) will
12 not reasonably lead to the discovery of admissible evidence.

13 REQUEST NO. 10:

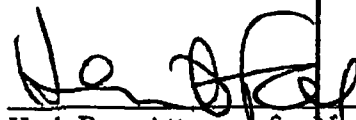
14 All DOCUMENTS constituting, evidencing, concerning, discussing or mentioning any contract,
15 agreement, or arrangement for the printing, distribution, promotion, or sale of the book "All that Glitters:
16 The Crime and the Cover Up" by Raymond Chandler.

17 RESPONSE TO REQUEST NO. 10:

18 Raymond Chandler objects to producing these documents on the grounds that: (a) they are not
19 relevant to the subject matter at hand in that none of these documents contain any information regarding
20 any claims or defenses to the action; (b) production of these documents is an invasion of privacy in that
21 they reveal personal financial information.

22
23 Dated: 10/25, 2004

LAW OFFICE OF HERB FOX

24
25 

26 Herb Fox, Attorney for Non-Party
27 Raymond Chandler
28

VERIFICATION

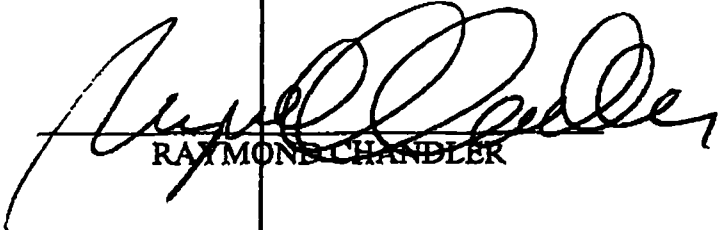
STATE OF CALIFORNIA

COUNTY OF SANTA BARBARA

I, the undersigned, having read the foregoing OBJECTIONS TO DEFENDANT'S SUBPOENA DUCES TECUM, say that I am a non-party to this action. I have read the above document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on this 25 day of OCT, 2004, at Santa Barbara, California.


RAYMOND CHANDLER

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA

3 I am employed in the County of Santa Barbara, State of California. I am over the age of 18 years
4 of age and not a party to the within action; my business address is 15 West Carrillo Street, Suite 211,
5 Santa Barbara, California 93101.

6 On Oct. 25, 2004, I served the foregoing document described as *Application To File*
7 *Under Seal And Without Notice To The People; Objections to Subpoena Duces Tecum; Proposed*
8 *Order* on the interested parties in this action as follows:

9 Brian Oxman
10 14126 E. Rosecrans
11 Santa Fe Springs, CA 90670
12 Telephone (562) 921-5058

13 BY UNITED STATES MAIL: (*California Overnight*)
14 I deposited such envelope in the mail at Santa Barbara, California. The envelope was mailed
15 with postage thereon fully prepaid.

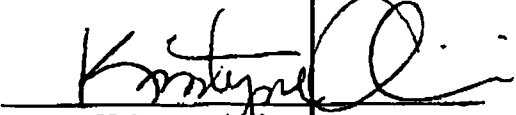
16 [] As follows: I am "readily familiar" with the firm's practice of collection and processing
17 correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that
18 same day with postage thereon fully prepaid at Santa Barbara, California in the ordinary course of
19 business. I am aware that on motion of the party served, service is presumed invalid if postal
20 cancellation date or postage meter date is more than one day after date of deposit for mailing in
21 affidavit.

22 [] BY PERSONALLY DELIVERY: I personally delivered said envelope to the name and address
23 indicated above.

24 [] BY FACSIMILE TRANSMISSION: The transmission of this document was reported as
25 complete and without error. A true and correct copy of the transmission reports are attached hereto.
26 This transmission report was property issued by the transmitting facsimile machine on this date.

27 Executed on Oct. 25, 2004 at Santa Barbara, California.

28 I declare under penalty of perjury under the laws of the State of California that the above is true
and correct.


Kristyne Aljian