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FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

NOV 30 2004

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

** Unsealed pursuant
to 6/11/05 court
order*

8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF

10
11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

13 Plaintiff,

14 v.

15 MICHAEL JACKSON,

16 Defendant.

CASE NO. 1133603

17 OBJECTIONS TO DOCUMENTS
18 REQUESTED BY THE SUBPOENA
19 DUCES TECUM DATED NOVEMBER
20 11, 2004 AND SIGNED BY R. BRIAN
21 OXMAN, ATTORNEY FOR MICHAEL J.
22 JACKSON

FILED UNDER SEAL
In Camera

23 Larry R. Feldman is responding to a subpoena duces tecum dated November 11, 2004
24 and signed by R. Brian Oxman, attorney for Michael J. Jackson. A copy of this subpoena is
25 attached as Exhibit "A".

26 Larry R. Feldman objects to this subpoena on the following grounds:

- 27 1. The subpoena requests documents that are protected from discovery and
28 production by the attorney-client privilege.
2. The subpoena requests documents that are protected from discovery and
production by the work-product doctrine.
3. The subpoena requests documents that are protected from discovery and
production by the constitutional right of privacy.

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4. The subpoena requests documents that are protected from discovery and production by other recognized privileges or doctrines.

5. The subpoena requests documents that are not relevant to any of the issues in this action.

DATED: 11.24.04

KAYE SCHOLER LLP
ROBERT M. TURNER

By 
ROBERT M. TURNER