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County of Santa Barbara  
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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

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF SANTA BARBARA  
10 SANTA MARIA DIVISION

11 ~~PROPOSED~~ REDACTED  
12 THE PEOPLE OF THE STATE OF CALIFORNIA, ) No. 1133603  
13 Plaintiff, )  
14 v. ) PLAINIFF'S PROPOSED  
15 ) EXAMINATION OF EnCase  
16 MICHAEL JOE JACKSON, ) COMPUTER HARDDRIVES  
17 Defendant. ) ~~WILL UNDER SEAL~~

18  
19 Plaintiff respectfully submits its Proposed Protocol for Experts' Examination of  
20 EnCase Computer Harddrives.

21 DATED: November 29, 2004

22 Respectfully submitted,

23 THOMAS W. SNEDDON, JR.  
District Attorney

24  
25 By: GS  
26 Gerald McC. Franklin, Senior Deputy  
27  
28

### Bradley Miller computers

Types of files (allocated, or erased and recoverable to be extracted from [REDACTED] computer hard drive evidence and provided to the Special Master for review. \*\* For reference, example file extensions are included with each file type. The listed file extensions are not meant to be an exhaustive list of the extensions to be searched for. We would like the examiner to include all file extensions recognized by EnCase, which relate to the given type of file.

1. Text files (.txt, .rtf)

[REDACTED] (These file types may contain writings, which discuss [REDACTED])

2. Document files (.doc, .wpd, .ppt, pdf, .xls)

a. Same as #1

3. Picture files (.jpg, .bmp, .tiff, .psd)

a. May visually document [REDACTED]

b. Picture files may also be used to identify individuals with places and time  
i. Some picture files contain information as to when the picture was taken.

4. Movie files (.mpeg, .wmv)

a. Same as #3

[REDACTED] Of particular note, [REDACTED]

5. Sound files (.wav)

a. May contain audible documentation of [REDACTED]

[REDACTED] Of particular note, [REDACTED]

6. Saved emails (.html)

a. Same as #1

7. Financial program files [Quicken, Microsoft Money] (.qdf, .qdb, .qdt)

a. Same as #1

i. These file types contain check register data, which oftentimes associates dates and locations with individuals, through purchase information.

Additionally, this type of file may contain information

The following is a list of Encase examination processes we would like performed on the Miller computer evidence files (in addition to extracting the above file types)

1. .html carver search
  - a. This may extract web page information including partial emails (see emails above)
2. graphic file search
  - a. This will search for deleted graphic files in the unallocated areas
3. file signature analysis
  - a. This will check to insure someone has not renamed the file extensions in order to hide the file.
    - i. Example taking a .jpg picture file and giving it a .exe executable file extension.
4. Key/ stringer word search of the unallocated areas. This will serve to narrow the information to be reviewed, thus minimizing the amount of information the Special Master will need to review. Stringer words we feel are pertinent to the investigation are as follows:

a. CPS

- i. Jackson
- j. Michael

y. Bill  
[Redacted]

aa. Larry  
[Redacted]

iii. MJJ Productions  
ggg. Santa Barbara District Attorney  
hhh. Sneddon  
iii. Santa Barbara Sheriff's Department

[Redacted]

iii. February  
mmmm. March

[Redacted]

rrr. "Living with Michael Jackson"

ttt. cancer  
uuu. contract(s)

cccc. interview

gggg. money  
hhhh. cash  
jjjj. Notebook

kkkk. Phonebook  
llll. Photos  
mmmm. Pictures

oooo. Ranch logs  
pppp. rebuttal  
qqqq. receipts  
rrrr. secret  
ssss. Security  
tttt. tapes  
uuuu. recordings

zzzz. videos

bbbb. Neverland

hhhh. Federal Building in L.A.

[REDACTED]

Types of files (allocated, or erased and recoverable to be extracted from [REDACTED] computer hard drive evidence and provided to the Special Master for review. \*\* For reference, example file extensions are included with each file type. The listed file extensions are not meant to be an exhaustive list of the extensions to be searched for. We would like the examiner to include all file extensions recognized by Encase, which relate to the given type of file.

1. Text files (.txt, .rtf)  
[REDACTED]
2. Document files (.doc, .wpd, .ppt, pdf, .xls)
  - a. Same as #1
3. Picture files (.jpg, .bmp, .tif, .psd)
  - a. Picture files may be used to identify individuals with places and time
    - i. Some picture files contain information as to when the picture was taken.
4. Movie files (.mpeg, .wmv)
  - a. Same as #3
5. Sound files (.wav)  
[REDACTED]
  - i. Digital recording of voice messages
  - ii. Dictations
6. Saved emails (.html)
  - a. Same as #1
7. Financial program files [Quicken, Microsoft Money] (.qdf, .qdb, .qdt)
  - a. Same as #1
    - i. These file types contain check register data, which oftentimes associates dates and locations with individuals, through purchase information.

The following is a list of Encase examination processes we would like performed on the [REDACTED] computer evidence files (in addition to extracting the above file types)

8. .html crawler search
    - a. This may extract web page information including partial emails (see emails above)
  9. Key/ stringer word search of the unallocated areas. The key word search of the unallocated areas can retrieve deleted and partially overwritten data from the file types documented above. This key word search will serve to narrow the information to be reviewed, thus minimizing the amount of information the Special Master will need to review. Absent the use of key words, a search of the
-

[REDACTED]

Types of files (allocated, or erased and recoverable to be extracted from [REDACTED] computer hard drive evidence and provided to the Special Master for review. \*\* For reference, example file extensions are included with each file type. The listed file extensions are not meant to be an exhaustive list of the extensions to be searched for. We would like the examiner to include all file extensions recognized by Encase, which relate to the given type of file.

1. Text files (.txt, .rtf)  
[REDACTED]
2. Document files (.doc, .wpd, .ppt, pdf, .xls)
  - a. Same as #1
3. Picture files (.jpg, .bmp, .tif, .psd)
  - a. Picture files may be used to identify individuals with places and time
    - i. Some picture files contain information as to when the picture was taken.
4. Movie files (.mpeg, .wmv)
  - a. Same as #3
5. Sound files (.wav)  
[REDACTED]
  - i. Digital recording of voice messages
  - ii. Dictations
6. Saved emails (.html)
  - a. Same as #1
7. Financial program files [Quicken, Microsoft Money] (.qdf, .qdb, .qdl)
  - a. Same as #1
    - i. These file types contain check register data, which oftentimes associates dates and locations with individuals, through purchase information.

The following is a list of Encase examination processes we would like performed on the [REDACTED] computer evidence files (in addition to extracting the above file types)

8. .html crawler search
    - a. This may extract web page information including partial emails (see emails above)
  9. Key/ stringer word search of the unallocated areas. The key word search of the unallocated areas can retrieve deleted and partially overwritten data from the file types documented above. This key word search will serve to narrow the information to be reviewed, thus minimizing the amount of information the Special Master will need to review. Absent the use of key words, a search of the
-

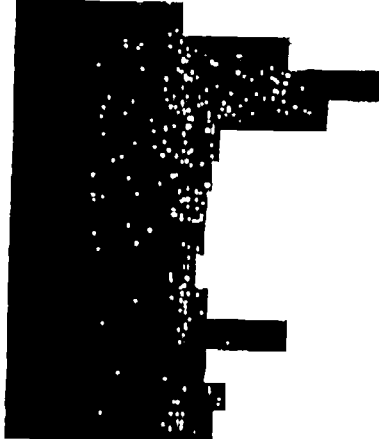
unallocated space would not be realistically feasible (akin to reading every book in a large library to find pertinent information) Stringer words we feel are pertinent to the investigation are as follows:

u. CPS

A large rectangular area of the document is completely blacked out, obscuring several lines of text.

i. Jackson


i. Michael

A large rectangular area of the document is completely blacked out, obscuring several lines of text.

y. Bill

A single line of text is completely blacked out.

aa. Larry

A large rectangular area of the document is completely blacked out, obscuring several lines of text.





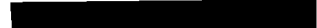
iii. MJJ Productions  
ggg. Santa Barbara District Attorney  
hhh. Sneddon  
iii. Santa Barbara Sheriff's Department



iii. February  
mmmm. March



rrr. "Living with Michael Jackson"



ttt. cancer  
uuu. contract(s)



cccc. interview

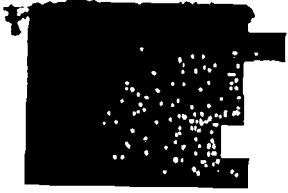


ssss. money  
hhhh. cash  
iiii. Notebook



kkkk. Phonebook

llll. Photos  
mmmm. Pictures



ttt. tapes  
uuuu. recordings



zzz. videos



bbbb. Neverland



ssss. State Department  
hhhh. Federal Building in L.A.



PROOF OF SERVICE

1013A(1)(3), 1013(c) CCP

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA:

I am a citizen of the United States of America and a resident of the county aforesaid. I am employed by the County of Santa Barbara, State of California. I am over the age of 18 and not a party to the within action. My business address is 312-H East Cook Street, Santa Maria, California.

On DECEMBER 3, 20 04, I served a copy of the attached PLAINTIFF'S PROPOSED PROTOCOL FOR EXPERTS' EXAMINATION OF ENCASE COMPUTER HARD DRIVES (FURTHER REDACTED BY THE COURT) addressed as follows:

THOMAS A. MESEREAU, JR.  
COLLINS, MESEREAU, REDDOCK & YU, LLP  
1875 CENTURY PARK EAST, 7<sup>TH</sup> FLOOR  
LOS ANGELES, CA 90067

THOMAS W. SNEDDON, JR.  
DISTRICT ATTORNEY'S OFFICE  
1112 SANTA BARBARA STREET  
SANTA BARBARA, CA 93101

FAX

By faxing true copies thereof to the receiving fax numbers of: (310) 861-1007 (Thomas Mesereau, Jr.); (805) 568-2398 (Thomas Sneddon). Said transmission was reported complete and without error. Pursuant to California Rules of Court 2005(i), a transmission report was properly issued by the transmitting facsimile machine and is attached hereto.

MAIL

By placing true copies thereof enclosed in a sealed envelope with postage fully prepaid, in the United States Postal Service mail box in the City of Santa Maria, County of Santa Barbara, addressed as above. That there is delivery service by the United States Postal Service at the place so addressed or that there is a regular communication by mail between the place of mailing and the place so addressed.


PERSONAL SERVICE

By leaving a true copy thereof at their office with the person having charge thereof or by hand delivery to the above mentioned parties.

EXPRESS MAIL

By depositing such envelope in a post office, mailbox, sub-post office, substation, mail chute, or other like facility regularly maintained by the United States Postal Service for receipt of Express Mail, in a sealed envelope, with express mail postage paid.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 3<sup>RD</sup> day of DECEMBER, 20 04, at Santa Maria, California.

  
CARRIE L. WAGNER