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17 Attorneys for Defendant
18 MICHAEL JOE JACKSON

19 SUPERIOR COURT OF THE STATE OF CALIFORNIA
20 FOR THE COUNTY OF SANTA BARBARA
21 SANTA MARIA DIVISION

22 THE PEOPLE OF THE STATE OF CALIFORNIA,
23 Plaintiff,
24 vs.
25 MICHAEL JOE JACKSON
26 Defendant.

27 CASE NO. 1133603
28 EX PARTE APPLICATION TO FILE UNDER
SEAL THOMAS A. MESEREAU, JR.'S
REQUEST TO MAKE A PUBLIC
STATEMENT; [PROPOSED] ORDER
THEREON

~~FILED UNDER SEAL BY FAX~~
HEARING:
DATE: JANUARY 13, 2005
TIME: 3:00 P.M.
Place: Dept. SM-2

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA
JAN 13 2005
GARY M. BLAIR, Executive Officer
Carrie L. Wagner
CARRIE L. WAGNER, Deputy Clerk

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1 On behalf of Mr. Michael J. Jackson ("Mr. Jackson"), lead counsel, Thomas A.
2 Mesereau, Jr., hereby applies *ex parte* for leave to file under seal a request that he be
3 permitted to make a public statement. Until the Court orders otherwise, the Request must
4 be filed under seal because the content therein includes references to matters that are
5 subject to this Court's Protective Order. Concurrently filed herewith are the Request and
6 the redacted version of the Request.

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

9 Dated: January 13, 2005

Respectfully submitted,

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

13 SANGER & SWYSEN
14 Robert M. Sanger

15 OXMAN & JAROSCAK
16 Brian Oxman

17 By:


18 Susan C. Yu
19 Attorneys for MICHAEL JOE JACKSON

DECLARATION OF SUSAN C. YU

1
2 I, Susan C. Yu, declare:

3 1. I am an attorney at law duly licensed to practice law in the courts of the
4 State of California, a partner in the law firm of Collins, Mesereau, Raddock & Yu, and co-
5 counsel for Mr. Michael Jackson. I submit this declaration in support of an *ex parte*
6 application for leave to file under seal a request that Thomas A. Mesereau, Jr., Mr.
7 Jackson's lead counsel, be permitted to make a public statement.

8 2. The Request describes materials that are subject to this Court's Protective
9 Order. Therefore, in accordance with the directives by this Court, leave is sought to file
10 this motion under seal.

11 I declare under penalty of perjury that the foregoing is true and correct and that this
12 declaration was executed this 13th day of January, 2005 at Los Angeles, California.

13
14 
15 Susan C. Yu