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18 Attorneys for Defendant  
19 **MICHAEL JOSEPH JACKSON**

20 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
21 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

22 THE PEOPLE OF THE STATE OF )  
23 CALIFORNIA, )

24 Plaintiffs, )

25 vs. )

26 MICHAEL JOSEPH JACKSON, )

27 Defendant. )

28 Case No. 1133603

EX PARTE APPLICATION FOR AN  
ORDER THAT MR. JACKSON BE  
ALLOWED TO MAKE A PUBLIC  
STATEMENT REGARDING  
INFORMATION LEAKED TO THE  
MEDIA; PROPOSED STATEMENT

Honorable Rodney S. Mcville

Date: TBA  
Time: TBA  
Dept: SM 8

29 TO THE CLERK OF THE ABOVE ENTITLED COURT:

30 Defendant requests that the Court issue an order allowing Mr. Jackson to make a public  
31 statement regarding information that has recently been leaked to the press regarding the details of

32 EX PARTE APPLICATION FOR AN ORDER THAT MR. JACKSON BE ALLOWED TO MAKE A PUBLIC  
33 STATEMENT REGARDING INFORMATION LEAKED TO THE MEDIA

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA

JAN 18 2005

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

1 the prosecution's case. This request is based on the overriding interests of Mr. Jackson's rights to  
2 due process and a fair trial under the Fifth, Sixth and Fourteenth Amendments to the United States  
3 Constitution and Article I, Sections 1, 7, and 15 of the California Constitution.

4 Dated: January 18, 2005

5 Respectfully submitted,

6 COLLINS, MESEREAU, REDDOCK & YU  
7 Thomas A. Mesereau, Jr.  
8 Susan C. Yu

9 SANGER & SWYSEN  
10 Robert M. Sanger

11 OXMAN & JAROSCAK  
12 Brian Oxman

13 By: Robert M. Sanger  
14 Robert M. Sanger  
15 Attorneys for Defendant  
16 MICHAEL JOSEPH JACKSON

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28 EX PARTE APPLICATION FOR AN ORDER THAT MR. JACKSON BE ALLOWED TO MAKE A PUBLIC  
STATEMENT REGARDING INFORMATION LEAKED TO THE MEDIA

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I.

3 MR. JACKSON SHOULD BE ALLOWED TO MAKE A PUBLIC STATEMENT  
4 REGARDING THE INFORMATION THAT WAS RECENTLY LEAKED TO THE

5 MEDIA

6 The content of the grand jury transcripts, as well as investigative reports, have been  
7 leaked to the media. ABC Television's Primetime Live recently aired portions of the grand jury  
8 transcripts and [www.thesmokinggun.com](http://www.thesmokinggun.com) recently published an account of the prosecution's  
9 case, based on police reports and grand jury transcripts, under the heading "The Predator." The  
10 disclosure of these prejudicial materials on the eve of trial threaten to deprive Mr. Jackson of his  
11 rights to due process and a fair trial under the Fifth, Sixth and Fourteenth Amendments to the  
12 United States Constitution and Article I, Sections 1, 7, and 15 of the California Constitution. As  
13 such, Mr. Jackson respectfully requests that he be allowed to make a public statement. A copy of  
14 the proposed statement is attached.

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28 EX PARTE APPLICATION FOR AN ORDER THAT MR. JACKSON BE ALLOWED TO MAKE A PUBLIC  
STATEMENT REGARDING INFORMATION LEAKED TO THE MEDIA

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CONCLUSION

For the reasons stated above, Mr. Jackson requests that the Court issue an order allowing him to make the attached proposed public statement.

Dated: January 18, 2005

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

SANGER & SWYSEN  
Robert M. Sanger

OXMAN & JAROSCAK  
Brian Oxman

By: Robert M. Sanger  
Robert M. Sanger  
Attorneys for  
MICHAEL JOSEPH JACKSON

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EX PARTE APPLICATION FOR AN ORDER THAT MR. JACKSON BE ALLOWED TO MAKE A PUBLIC STATEMENT REGARDING INFORMATION LEAKED TO THE MEDIA

STATEMENT OF MICHAEL JACKSON

[REDACTED]

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