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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA
JAN 20 2005
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
12 THE PEOPLE OF THE STATE OF CALIFORNIA,) ~~(REDACTED)~~ REDACTED VERSION
13 Plaintiff,) No. 1133603
14 v.) PLAINTIFF'S REPLY TO
15) DEFENDANT'S OPPOSITION
16 MICHAEL JOE JACKSON,) TO MOTION TO ADMIT
17 Defendant.) EVIDENCE [REDACTED]
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)
DATE: January 21, 2005
TIME: 9:30 a.m.
DEPT: TBA (Melville)

20 The People have moved the Court for leave to introduce evidence of [REDACTED]
21 [REDACTED] expert testimony.
22 Defendant argues that the People should not be allowed to present evidence of [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 The same argument was raised in multiple, unsuccessful, motions to dismiss. The
26 Court has continued to rule that it is for the jury to decide issues of credibility.
27 Defendant also argues that the true motivation for the introduction of this evidence
28 is [REDACTED] the

1 Supreme Court held that the prosecution had the right to introduce evidence that [REDACTED]

2 [REDACTED] facts.com

3 [REDACTED] mjfacts.com

4 [REDACTED] mjfacts.com

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 We have stated in our moving papers that the evidence of [REDACTED]

9 [REDACTED]. That is

10 what we intend to do. We will be submitting appropriate instructions to carefully guide the
11 jury in its consideration of that evidence. We will confine our evidence to the stated purpose.

12

13 DATED: January 20, 2005

14 facts.com THOMAS W. SNEDDON, JR.
15 District Attorney

16 By: RS by G.M.C. F.
17 Ronald J. Zonen, Senior Deputy
18 Attorneys for Plaintiff

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PROOF OF SERVICE

STATE OF CALIFORNIA }
COUNTY OF SANTA BARBARA } SS

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and I am not a party to the within-entitled action. My business address is: District Attorney's Office; Courthouse; 1112 Santa Barbara Street, Santa Barbara, California 93101.

Redacted

On January 20, 2005, I served the within *Redacted* PLAINTIFF'S REPLY TO DEFENDANT'S OPPOSITION TO THE ADMISSION OF "CHILD ABUSE TRAUMA SYNDROME" EVIDENCE on Defendant, by THOMAS A. MESEREAU, JR., ROBERT SANGER and BRIAN OXMAN, by delivering a true copy to Attorney Sanger's officer and causing a true copy to be transmitted to Mr. Mesereau at the facsimile number given us by counsel, and then causing that copy to be mailed to Mr. Mesereau at the address shown on the Service List.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Santa Barbara, California on this 20th day of January, 2005.


Gerald McC. Franklin

SERVICE LIST

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