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FILED
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SANTA BARBARA

2005 FEB 10 AM 10:30
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 VERSION

12 THE PEOPLE OF THE STATE OF CALIFORNIA,

13 Plaintiff,

14 v.

15 MICHAEL JOE JACKSON,

16 Defendant.

No. 1133603

17 PLAINTIFF'S MOTION TO
EXCLUDE ANY REFERENCE BY
DEFENSE COUNSEL TO

DATE: February 10, 2005
TIME: 10:30 a.m.
DEPT: TBA (Melville)

18
19 UNDER SEAL

20 TO: THE CLERK OF THE SUPERIOR COURT AND TO DEFENDANT AND HIS
21 COUNSEL:

22 PLEASE TAKE NOTICE that on February 10, 2005, Plaintiff will move the court
23 for its order forbidding counsel to inquire about

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25 The motion will be based on this notice and the accompanying Memorandum of
26 Points and Authorities.

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DATED: January 31, 2005

Respectfully submitted,

THOMAS W. SNEDDON, JR.
District Attorney

By: 
Ronal J. Zonen, Senior Deputy

Attorneys for Plaintiff

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 DEFENSE COUNSELS' SUGGESTION THAT [REDACTED]

3 [REDACTED]

4 MORE IMPORTANTLY,

5 THE ALLEGATION IS IRRELEVANT TO ANY ISSUE
6 IN THE PENDING PROCEEDING

7 A. Introduction

8 This motion is based on defense counsels' allegation in their [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 By their Opposition, defense counsel have manifested their intention to explore this
24 area in their cross-examination of Jane Doe unless expressly prohibited from doing so by order
25 of this Court.

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]

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DATED: January 31, 2005

THOMAS W. SNEDDON, JR.
District Attorney

By: 151
Ronald J. Zonen, Senior Deputy
Attorneys for Plaintiff

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 31, 2005, I served the within PLAINTIFF'S MOTION TO

[Redacted]

on Defendant, by THOMAS A. MESEREAU, JR., ROBERT SANGER and BRIAN OXMAN, by personally delivering a true copy thereof to the attorney representing Defendant in the jury selection proceedings in court.

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

Executed at Santa Maria, California on this 31st day of January, 2005.

Gerald M. C. Frank

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SERVICE LIST

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