

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY OF SANTA BARBARA.

FEB 05 2004

GARY M. BLAIR, EXEC. OFFICER

By Alicia Alcocer
ALICIA ALCOCER, Deputy Clerk

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara
2 By: RONALD J. ZONEN (State Bar No. 85094)
Senior Deputy District Attorney
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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF SANTA BARBARA**
9 **SANTA MARIA DIVISION**

10
11 THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

14 MICHAEL JOE JACKSON,

Defendant.

No. 1133603

PLAINTIFF'S OPPOSITION
TO MEDIA'S FURTHER
REQUEST TO PHOTOGRAPH
OR BROADCAST COURT
PROCEEDINGS

DATE: February 13, 2004
TIME: 8:30 a.m.
DEPT: SM 2 (Melville)

17
18 **A. Introduction:**

19 Counsel for National Broadcasting Company, Inc., CBS Broadcasting, Inc., Fox
20 News Network LLC, ABC, Inc., Cable News Network, Inc., The New York Times Company,
21 the *Los Angeles Times*, Courtroom Television Network LLC, Santa Barbara News-Press, and
22 Associated Press (collectively, "Media") have moved, pursuant to rule 980, California Rules of
23 Court, to film and/or broadcast in-court proceedings, commencing with the proceedings
24 calendared for February 13, 2004.

25 Julian Poon, Esquire, one of the lawyers for Media, courteously telephoned the
26 undersigned and inquired whether counsel for plaintiff would object to their anticipated
27 motion. Based on the undersigned's conversations with District Attorney Tom Sneddon that
28 predated our appearance before the court on January 16, 2004, the undersigned informed

1 Attorney Poon that the District Attorney had no particular objection to in-court filming prior to
2 trial, but would vigorously opposed such activity when the matter came to trial. In his
3 submission to this court, **Media's counsel accurately related the District Attorney's position**
4 **as the undersigned had stated it to him.**

5 The undersigned mentioned his cordial telephone conversation with Attorney Poon
6 to the District Attorney a few days ago. Mr. Sneddon told the undersigned he had changed his
7 mind on the question following the January 16th proceedings, and that he presently is opposed
8 to media broadcasting or filming any in-court proceedings in this matter.

9 Plaintiff respectfully lodges its opposition to Media's renewed request, with
10 sincerest apologies to Media's counsel.

11 DATED: February 5, 2004

12 Respectfully submitted,

13 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
14 County of Santa Barbara

15 By: 

16 Gerald McC. Franklin, Senior Deputy

17 Attorneys for Plaintiff
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PROOF OF SERVICE

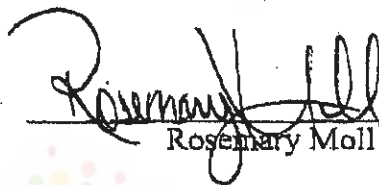
STATE OF CALIFORNIA }
COUNTY OF SANTA BARBARA } SS

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; 1105 Santa Barbara Street, Santa Barbara, California 93101.

On February 5, 2004, I served the within PLAINTIFF'S OPPOSITION TO MEDIA'S FURTHER REQUEST TO PHOTOGRAPH OR BROADCAST COURT PROCEEDINGS on Defendant, by MARK JOHN GERAGOS, ROBERT SANGER, STEVE COCHRAN and BENJAMIN BRAFMAN, his counsel in this action, and on GIBSON, DUNN & CRUTCHER, THEODORE BOUTROUS, JR and JULIAN POON, counsel for Media, by faxing a true copy to each counsel at the facsimile number shown with the address for each on the attached Service List, and then by causing to be mailed a true copy thereof to counsel at that address.

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

Executed at Santa Barbara, California on this 5th day of February, 2004.



Rosemary Moll



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Santa Maria Division, SM 2
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