

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY OF SANTA BARBARA

FEB 06 2004

GARY M. BLAIR, EXEC. OFFICER

By Alicia Alcocer
ALICIA ALCO CER, Deputy Clerk

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DANIEL V. NIXON, SBN 132392
Attorney for Bradley G. Miller, Private Investigator
and Property Claimant

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA BARBARA**

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

vs.

MICHAEL JACKSON,

Defendant.

Case No.: 1133603

BRADLEY G. MILLER'S
JOINDER IN DEFENDANT'S
RESPONSE TO PLAINTIFF'S
MEMORANDUM REGARDING
DEFENDANT'S CLAIM OF
ATTORNEY-CLIENT AND
ATTORNEY WORK PRODUCT
PRIVILEGES

DATE: February 13, 2004
TIME : 8:30 a.m.

Private Investigator Bradley G. Miller, through his counsel, Daniel V. Nixon,
hereby respectfully joins in, "Defendant's Response to Plaintiff's Memorandum
Regarding Defendant's Claim of Attorney-Client and Attorney Work Product Privileges,"
and further requests leave of the Court to address the issues of attorney-client and

- 1 -

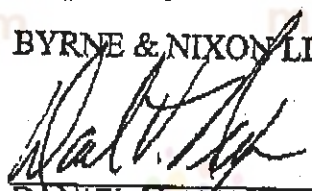
BRADLEY G. MILLER'S JOINDER IN DEFENDANT'S RESPONSE TO PLAINTIFF'S MEMORANDUM
REGARDING DEFENDANT'S CLAIM OF ATTORNEY-CLIENT AND ATTORNEY WORK PRODUCT
PRIVILEGES

1 attorney work product privileges, in-camera.

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3 DATED: February 3, 2004

Respectfully submitted,
BYRNE & NIXON LLP

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5 By:


DANIEL V. NIXON
Attorney for Bradley G. Miller

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BRADLEY G. MILLER'S JOINDER IN DEFENDANT'S RESPONSE TO PLAINTIFF'S MEMORANDUM
REGARDING DEFENDANT'S CLAIM OF ATTORNEY-CLIENT AND ATTORNEY WORK PRODUCT
PRIVILEGES

PROOF OF SERVICE

STATE OF CALIFORNIA

CITY AND COUNTY OF LOS ANGELES

} ss:

I am employed in the City and County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Byrne & Nixon LLP, Two California Plaza, 350 South Grand Avenue, 39th Floor, Los Angeles, California 90071.

On February 6, 2004, I served the foregoing document(s) described as: **BRADLEY G. MILLER'S JOINDER IN DEFENDANT'S RESPONSE TO PLAINTIFF'S MEMORANDUM REGARDING DEFENDANT'S CLAIM OF ATTORNEY-CLIENT AND ATTORNEY WORK PRODUCT PRIVILEGES** on the interested parties via facsimile to the following numbers:

Judge Rodney S. Melville
Fax: (805) 346-7616

Thomas Sneddon, District Attorney
Gerald Franklin, Deputy District Attorney
Fax: (805) 568-2396

Mark J. Gcragos
Fax: (213) 625-1600

Benjamin Brafman, Esq.
Fax: (212) 750-3906

Steve Cochran, Esq.
Fax: (310) 712-8455

Robert M. Sanger, Esq.
Fax: (805) 963-7311

VIA OVERNIGHT MAIL:

VIA : By delivering such documents to an overnight mail service or an authorized courier in a sealed envelope or package designated by the express service courier addressed to the person(s) on whom it is to be served.

VIA U.S. MAIL:

I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice such sealed envelope(s) would be deposited with the U.S. postal service on February 6, 2004 with postage thereon fully prepaid, at Los Angeles, California.

VIA PERSONAL DELIVERY:

I personally delivered such sealed envelope(s) by hand to the offices of the addressee pursuant to CCP § 1011.

VIA FACSIMILE:

The facsimile transmission report indicated that the transmission was complete and without error. The facsimile was transmitted via facsimile on February 6, 2004. The transmission report was reported as complete and without error.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct and I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. Executed on February 6, 2004, at Los Angeles, California.


Dimitër Nikolov