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

FEB 24 2005

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

4 **SANGER & SWYSEN**  
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9 14126 East Rosecrans  
Santa Fe Springs, CA 90670  
10 Tel.: (562) 921-5058, Fax: (562) 921-2298

11 Attorneys for Defendant  
MICHAEL JOSEPH JACKSON

12  
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
14 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION  
15

16 THE PEOPLE OF THE STATE OF )  
17 CALIFORNIA, )  
18 Plaintiffs, )  
19 vs. )  
20 MICHAEL JOSEPH JACKSON, )  
21 Defendant. )

Case No. 1133603  
MR. JACKSON'S PROPOSED  
REDACTED MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
SUPPORT OF MOTION TO DISMISS  
AND MOTION TO PERMIT  
BROADCAST RESPONSE

Honorable Rodney S. Melville

Date: ~~March 7, 2005~~  
Time: 8:30 a.m.  
Dept: ~~SM 2~~

~~FILED UNDER SEAL~~

25 TO THE CLERK OF THE ABOVE ENTITLED COURT:  
26  
27 Please take notice that accompanying this document are the following:  
28

1 (1) Mr. Jackson's Memorandum of Points and Authorities in Support of Motion to Dismiss  
2 and Motion to Permit Broadcast Response; and (2) Declaration of Brian Oxman In Support of  
3 Motion to Dismiss and Motion to permit Broadcast Response.

4 These proposed redacted documents are submitted pursuant to the Ex Parte Application to  
5 Seal filed with the court on February 23, 2005.

6  
7 Dated: February 23, 2005

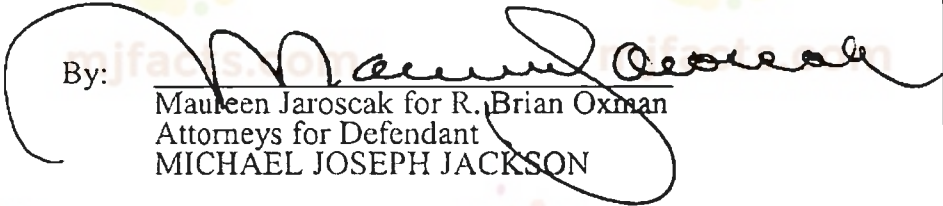
Respectfully submitted,

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

10 SANGER & SWYSEN  
11 Robert M. Sanger

12 OXMAN & JAROSCAK  
13 Brian Oxman

14 By:

  
15 Maureen Jaroscak for R. Brian Oxman  
16 Attorneys for Defendant  
17 MICHAEL JOSEPH JACKSON

1 PROOF OF SERVICE BY EXPRESS DELIVERY

2  
3 I, Maureen Jaroscak, declare and say:

4 I am an attorney at law admitted into practice before all of the courts of the State of California  
5 and I am employed at 14126 East Rosecrans Blvd., Santa Fe Springs, California 90670. I m over 18 years  
6 and not a party to the above-entitled action. On February 23, 2005, I served the following:

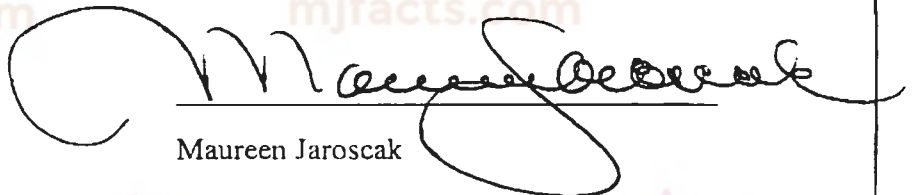
7 MR. JACKSON'S PROPOSED REDACTED MEMORANDUM OF POINTS AND  
8 AUTHORITIES IN SUPPORT OF MOTION TO DISMISS AND MOTION TO PERMIT  
9 BROADCAST RESPONSE AND DECLARATION OF BRIAN OXMAN IN SUPOORT OF  
10 MOTION TO DISMISS AND MOTION TO PERMIT BROADCAST RESPONSE

11 on the interested parties by placing a true copy of the document in a sealed envelope, with all delivery fees  
12 prepaid for overnight express delivery, and depositing it with Overnight Express, an express delivery  
13 service located at 17817 Gillette Avenue, Irvine, CA 92614, and addressed as follows:

14 Thomas Sneddon  
15 1112 Santa Barbara Street  
16 Santa Barbara, CA 93101

17 I declare under penalty of perjury under the laws of the State of California the foregoing is true and  
18 correct.

19 Executed this 23rd day of February, 2005, at Santa Fe Springs, California.

20   
21 \_\_\_\_\_  
22 Maureen Jaroscak