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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

MAR 2 2005

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** Unsealed pursuant
to 6/11/05 court
order*

11 Attorneys for Defendant
MICHAEL JOSEPH JACKSON

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

16 THE PEOPLE OF THE STATE OF
17 CALIFORNIA,
18 Plaintiffs,
19 vs.
20 MICHAEL JOSEPH JACKSON,
21 Defendant.
22

) Case No. 1133603
) NOTICE OF MOTION AND MOTION TO
) COMPEL COMPLIANCE WITH SUBPOENA
) TO DR. GEORGE SUN
) Honorable Rodney S. Melville
) Date: March 11, 2005
) Time: 8:30 a.m.
) Dept: SM Y 8
) ~~FILED UNDER SEAL AND IN CAMERA~~

24
25 TO COMPLAINING PARTIES, JANET ARVIZO, DAVELLIN ARVIZO, GAVIN
26 ARVIZO, AND STAR ARVIZO, AND THEIR ATTORNEYS OF RECORD:

27 PLEASE TAKE NOTICE that on March 11, 2005, at 8:30 a.m. or as soon thereafter as the

28 MOTION TO COMPEL COMPLIANCE WITH SUBPOENA TO UCLA MEDICAL CENTER

1 matter can be heard, in Department SM-⁸ of the above-entitled court located at 312 East Cook Street,
2 Santa Maria, California 93454, Michael Jackson will move the court for an order Compelling
3 Compliance with Subpoena to Dr. George Sun and overruling the objection submitted by the
4 complaining witnesses. This motion will be based on the following grounds:

5 (1) There is no physician-patient privilege in criminal proceedings, and the Subpoenaed
6 Party's objection to responding to Mr. Jackson's subpoena is without legal or factual support;

7 (2) The complaining mother's medical treatment with Dr. George Sun and Advanced Center
8 Medical Group is relevant and material to this case because she solicited money from individuals,
9 including Michael Jackson, claiming she needed to pay for medical bills for her ill child, when in
10 truth she utilized the money to obtain an "elective" breast enhancement and tummy tuck with Dr.
11 Sun and Advanced Center Medical Group, and the costs and payment details of such diversion of
12 funds demonstrates a pattern of misrepresentation to obtain money from Michael Jackson;

13 (3) The complaining mother's medical records and condition is relevant because she claims
14 physical injuries as a result of Mr. Jackson's conduct and she has placed in issue her physical and
15 mental conditions.

16 This Motion will be based on this Notice of Motion and Motion, the accompanying
17 Memorandum of Points and Authorities, and all the records, papers, and pleadings on file with the
18 with the court.

19 Dated: March 1, 2005

20 COLLINS, MESEREAU, REDDOCK & YU
21 Thomas A. Mesereau, Jr.
Susan C. Yu

22 SANGER & SWYSEN
23 Robert M. Sanger

24 OXMAN & JAROSCAK
25 Brian Oxman

26 By:


27 R. Brian Oxman
Attorneys for
MICHAEL JOSEPH JACKSON