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8 *Angeles Times*; and The New York Times  
Company

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

MAR 26 2004

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

10 SUPERIOR COURT, STATE OF CALIFORNIA  
11 FOR THE COUNTY OF SANTA BARBARA

13 THE PEOPLE OF THE STATE OF  
14 CALIFORNIA,

15 Plaintiff,

16 vs.

17 MICHAEL JOE JACKSON,

18 Defendant.

Case No.: 1133603

**COMPENDIUM OF NON-CALIFORNIA  
AUTHORITIES IN SUPPORT OF  
OBJECTIONS OF THE ACCESS  
PROponents TO THE SEALING OR  
CONDITIONAL SEALING OF: (1) THE  
PEOPLE'S APPLICATION FOR AN  
ORDER TO SHOW CAUSE RE  
CONTEMPT; AND (2) DOCUMENTS AND  
RECORDS RELATED TO THE  
ADDITIONAL SEARCH WARRANTS  
REFERRED TO IN THE COURT'S  
MARCH 24, 2004 ORDER**

Date: Friday, April 2, 2004

Time: 8:30 a.m.

Place: Department SM9,  
Judge Rodney S. Melville

[VIA FACSIMILE]

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COMPENDIUM OF NON-CALIFORNIA AUTHORITIES IN SUPPORT OF OBJECTIONS OF THE ACCESS PROponents TO THE  
SEALING OR CONDITIONAL SEALING OF: (1) THE PEOPLE'S APPLICATION FOR AN ORDER TO SHOW CAUSE RE  
CONTEMPT; AND (2) DOCUMENTS AND RECORDS RELATED TO THE ADDITIONAL SEARCH WARRANTS REFERRED TO IN  
THE COURT'S MARCH 24, 2004 ORDER

1 Attached herein in support of the Objections Of The Access Proponents To The Sealing Or  
2 Conditional Sealing Of: (1) The People's Application For An Order To Show Cause Re Contempt;  
3 And (2) Documents And Records Related To The Additional Search Warrants Referred To In The  
4 Court's March 24, 2004 Order, are the following two non-California authorities:

- 5 1. *ABC, Inc. v. Martha Stewart*, No. 04-0220-cr, 2004 U.S. App. LEXIS 2592, (2d Cir.  
6 Feb. 18, 2004); and  
7 2. *Globe Newspaper Co. v. Superior Ct.*, 457 U.S. 596 (1982).

8 DATED: March 26, 2004

9 Respectfully submitted,

10 GIBSON, DUNN & CRUTCHER LLP  
11 Theodore J. Boutros, Jr.  
12 Julian W. Poon

13 By: *Theodore J. Boutros, Jr.*

14 Theodore J. Boutros, Jr.

15 Attorneys for National Broadcasting Company, Inc.;  
16 CBS Broadcasting Inc.; Fox News Network L.L.C.;  
17 ABC, Inc.; Cable News Network LP, LLLP; Courtroom  
18 Television Network LLC; The Associated Press; *Los*  
19 *Angeles Times*; and The New York Times Company

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