

1 Thomas A. Mesereau, Jr. (SBN 91182)  
2 Susan C. Yu (SBN 195640)  
3 COLLINS, MESEREAU, REDDOCK & YU, LLP  
4 1875 Century Park East, 7<sup>TH</sup> Floor  
5 Los Angeles, California 90067  
6 Tel: (310) 284-3120; Fax: (310) 284-3133

7 Robert M. Sanger (SBN 58214)  
8 SANGER & SWYSEN  
9 233 E. Carrillo St., Suite C  
10 Santa Barbara, CA 93101  
11 Tel: (805) 962-4887; Fax: (805) 963-7311

12 Attorneys for Defendant  
13 MICHAEL JOE JACKSON

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 FOR THE COUNTY OF SANTA BARBARA  
16 SANTA MARIA DIVISION

17 THE PEOPLE OF THE STATE OF  
18 CALIFORNIA,

19 Plaintiff,

20 vs.

21 MICHAEL JOE JACKSON

22 Defendant.

23 CASE NO. 1133603

24 } *EX PARTE* APPLICATION TO FILE UNDER  
25 } SEAL: (1) SUPPLEMENTAL REQUEST FOR  
26 } ATTENDANCE OF OUT-OF-STATE  
27 } WITNESS (PEN. CODE § 1334); AND (2)  
28 } CERTIFICATE OF REQUESTING STATE  
FOR ATTENDANCE OF WITNESS  
LOCATED OUTSIDE; [PROPOSED] ORDER

HEARING: NOT REQUIRED

DATE: N/A

TIME: N/A

Place: Dept. SM-2

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

MAY - 3 2005

GARY M. BLAIR, Executive Officer

By *Carrie L. Wagner*  
CARRIE L. WAGNER, Deputy Clerk

1 Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies *ex parte* for  
2 leave to file under seal: (1) supplemental request for attendance of out-of-state witness  
3 (Pen. Code § 1334) ("Request"); and (2) certificate of requesting state for attendance of  
4 witness located outside ("Certificate").

5 This Request is made to protect the witness from being unduly harassed and to  
6 preserve Mr. Jackson's constitutional rights to a fair trial, due process of law, a fair and  
7 impartial jury, the effective assistance of counsel, and to equal protection of the laws and  
8 the privileges and immunities guaranteed by the 4th, 5th, 6th and 14th Amendments to  
9 the United States Constitution and Article I of the California Constitution. Accordingly,  
10 Mr. Jackson respectfully requests that the Court not release the unredacted version of the  
11 Request and the Certificate until the witness is served. The defense will promptly notify  
12 the Court when so served. Until then, the defense requests that the Court release only the  
13 redacted version, concurrently filed herewith.

14 This application is based upon the attached declaration of Susan C. Yu, the files  
15 and record in this case and any other information presented prior to a ruling hereon.

16 Dated: May 3, 2005

Respectfully submitted,

18 COLLINS, MESEREAU, REDDOCK & YU  
19 Thomas A. Mesereau, Jr.  
Susan C. Yu

20 SANGER & SWYSEN  
21 Robert M. Sanger

22 By:

  
23 Susan C. Yu  
Attorneys for MICHAEL JOE JACKSON

