

1 SUSAN C. YU (SBN 195640)  
2 COLLINS, MESEREAU, REDDOCK & YU  
3 1875 Century Park East, 7<sup>th</sup> Floor  
4 Los Angeles, CA 90067  
5 Telephone: 310-284-3120  
6 Facsimile: 310-284-3133

7 Steve Cochran (SBN 105541)  
8 KATTEN MUCHN ZAVIS ROSENMAN  
9 2029 Century Park East, Suite 2600  
10 Los Angeles, California 90067  
11 Telephone: (310) 788-4400  
12 Facsimile: (310) 712-8455

13 Robert M. Sanger (SBN 58214)  
14 SANGER & SWYSEN  
15 233 E. Carrillo Street, Suite C  
16 Santa Barbara, California 93101  
17 Telephone: 805-962-4887  
18 Facsimile: 805-963-7311

19 Attorneys for Defendant  
20 MICHAEL J. JACKSON

21 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
22 FOR THE COUNTY OF SANTA BARBARA  
23 SANTA MARIA DIVISION

24 THE PEOPLE OF THE STATE OF  
25 CALIFORNIA,

26 Plaintiff,

27 vs.

28 MICHAEL J. JACKSON

Defendant.

CASE NO. 1133603

**EX PARTE APPLICATION FOR  
LEAVE TO FILE UNDER SEAL  
MR. JACKSON'S MOTION FOR  
REDUCTION OF BAIL**

~~FILED UNDER SEAL~~

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

MAY 14 2004

GARY M. BLAIR, Executive Officer

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

1 Defendant MICHAEL J. JACKSON, through his counsel, hereby applies EX PARTE for  
2 leave to file under seal his motion for reduction of bail. Filing under seal is  
3 necessary because the content of the motion includes reference to information subject  
4 to this Court's protective order.

5 This application is based upon the attached declaration of Steve Cochran, the  
6 file and record in this case and any other information presented prior to a ruling  
7 hereon.

8 May 13, 2004

Respectfully submitted,

9 Thomas A. Mesereau, Jr.  
10 Susan Yu  
11 COLLINS, MESEREAU, REDDOCK & YU

12 Steve Cochran  
13 KATTEN MUCHIN ZAVIS ROSENMAN

14 Robert M. Sanger  
15 SANGER & SWYSEN

16 By:

Steve Cochran  
17 Steve Cochran  
18 Attorneys for Defendant  
19 MICHAEL J. JACKSON  
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DECLARATION OF STEVE COCHRAN

I, Steve Cochran, declare as follows:

1. I am an attorney duly authorized to practice before all courts of the State of California and am a partner of the law firm of Katten Muchin Zavis Rosenman, co-counsel for Michael J. Jackson. I submit this declaration in support of an ex parte application for leave to file under seal Mr. Jackson's motion for reduction of bail.

2. This motion contains a summary that reveals non-public information regarding the imposition of bail. Under-seal submission of this motion is necessary to implement this Court's protective and under-seal orders. This motion will be served upon the prosecution without redaction.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of May, 2004 at Los Angeles, California.

Steve Cochran  
Steve Cochran

**PROOF OF SERVICE BY MAIL**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen and not a party to the within action, and my business address is Katten Muchin Zavis Rosenman (the "business"), 2029 Century Park East, Suite 2600, Los Angeles, California 90067.

( ) I am readily familiar with the business's practice for collection and processing of correspondence for mailing with the United States Postal Service; such correspondence would be deposited with the United States Postal Service the same day of deposit in the ordinary course of business.

(X) By Facsimile Machine, I caused the above-referenced document(s) to be transmitted to the above-named persons.

On May 14, 2004, I served the foregoing documents described as

**EX PARTE APPLICATION TO FILE MOTION FOR REDUCTION OF BAIL;  
(PROPOSED) ORDER**

**NOTICE/MOTION FOR REDUCTION OF BAIL**

on the interested parties in this action as follows:

Thomas W. Sneddon, Jr.  
District Attorney of Santa Barbara  
1105 Santa Barbara Street  
Santa Barbara, CA 93101

Fax: 805-568-2398

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed on May 14, 2004, at Los Angeles, California.

  
Shirley Appleton