

1 STEPHEN SHANE STARK, COUNTY COUNSEL
2 STEPHEN D. UNDERWOOD, CHIEF ASSISTANT (sbn 063057)
3 COUNTY OF SANTA BARBARA
4 105 E. Anapamu St., Suite 201
5 Santa Barbara, CA 93101
6 (805) 568-2950 / FAX: (805) 568-2982

7 Attorneys for Jim Anderson, Sheriff,
8 County of Santa Barbara

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

AUG 12 2004

GARY M. BLAIR, Executive Officer
BY *Garry M. Blair*
GARRIE L. WARDEN, Deputy Clerk

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF SANTA BARBARA
11 (COOK DIVISION)

12 **PEOPLE OF THE STATE OF CALIFORNIA,**

13 Plaintiffs,

14 vs.

15 **MICHAEL JOE JACKSON,**

16 Defendant.

17 Case No: 1133603

18 **APPLICATION OF JIM ANDERSON, SHERIFF, COUNTY OF SANTA BARBARA, THAT MOTION TO RELEASE ATTORNEY GENERAL'S CONCLUSIONS REGARDING ITS INVESTIGATION INTO DEFENDANT'S ALLEGATIONS OF MISTREATMENT AT THE SANTA BARBARA COUNTY JAIL BE CONDITIONALLY FILED UNDER SEAL**

19 Date: August 19, 2004

20 Time: 8:30 a.m.

21 Dept: SM 2

22 **FILED UNDER SEAL**

23 Assigned Judge: Hon. Rodney S. Melville

24 **TO THE HONORABLE RODNEY S. MELVILLE, JUDGE OF THE**
25 **SUPERIOR COURT, AND ALL INTERESTED PARTIES:**

26 PLEASE TAKE NOTICE THAT Jim Anderson, Sheriff, County of Santa Barbara,
27 hereby requests that this Court authorize the attached Motion to Release Attorney
28 General's Conclusions Regarding its Investigation Into Defendant Michael Jackson's

COUNTY COUNSEL
County of Santa Barbara
105 East Anapamu Street
Santa Barbara, CA 93101
(805) 568-2950

Unsealed per order, dated 9/18/04

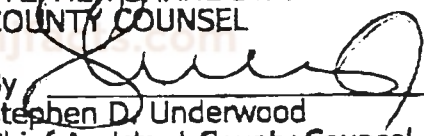
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Allegations of Mistreatment at the Santa Barbara County Jail be filed under seal.

The attached Motion contains information that has not otherwise been released to the public, and potentially may be information that would violate this Court's protective order. It is therefore necessary to have the Motion sealed until the Court determines whether or not the information may be released.

Dated: Aug 12, 2004

STEPHEN SHANE STARK
COUNTY COUNSEL

By 
Stephen D. Underwood
Chief Assistant County Counsel
Attorneys for Jim Anderson, Sheriff,
COUNTY OF SANTA BARBARA

COUNTY COUNSEL
County of Santa Barbara
.05 West Anapaste Street
Santa Barbara, CA 93101
(805) 568-2950

1 **PROOF OF SERVICE**
2 **(C.C.P. §§ 1013(a), 2015.5)**
3 **STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA**

4 I am a citizen of the United States and a resident of the county aforesaid; I am over
5 the age of eighteen years and not a party to the within entitled action; my business
6 address is 105 East Anapamu Street # 201, Santa Barbara, California.

7 On August 12, 2004 I served a true copy of the **APPLICATION OF JIM**
8 **ANDERSON, SHERIFF, COUNTY OF SANTA BARBARA, THAT MOTION TO**
9 **RELEASE ATTORNEY GENERAL'S CONCLUSIONS REGARDING ITS**
10 **INVESTIGATION INTO DEFENDANT'S ALLEGATIONS OF MISTREATMENT**
11 **AT THE SANTA BARBARA COUNTY JAIL BE CONDITIONALLY FILED UNDER**
12 **SEAL** on the Interested Parties in said action by:

13 facsimile transmission to the person(s) indicated below:

14 Thomas A. Mesereau, Jr.
15 Collins, Mesereau, Reddock & Yu, LLP
16 (310) 861-1007

17 Steve Cochran, Esq.
18 Katten, Muchin, Zavis & Rosenman, Lawyers
19 (310) 712-8455

20 Robert Sanger, Esq.
21 Sanger & Swysen, Lawyers
22 (805) 963-7311

23 Thomas W. Sneddon, District Attorney
24 Office of the District Attorney
25 (805) 568-2398

26 depositing it in the United States Mail in a sealed envelope with postage
27 thereon fully prepaid to the following:

28 Brian Oxman, Esq.
Oxman & Jaroscak, Lawyers
14126 E. Rosecrans Blvd.
Santa Fe Springs, CA 90670

(State) I declare, under penalty of perjury, that the above is true and correct.

Executed on August 12, 2004 at Santa Barbara, California.


Estella Rios