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14 Attorneys for Defendant
MICHAEL JOE JACKSON
15

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA

17 FOR THE COUNTY OF SANTA BARBARA

18 SANTA MARIA DIVISION

19 THE PEOPLE OF THE STATE OF
CALIFORNIA,

20 Plaintiff,

21 vs.

22 MICHAEL JOE JACKSON

23 Defendant.

) CASE NO. 1133603

) EX PARTE APPLICATION TO FILE UNDER
) SEAL OBJECTION AND RESPONSE TO
) NOTICE OF MOTION AND MOTION OF
) JIM ANDERSON FOR AUTHORIZATION
) TO RELEASE ATTORNEY GENERAL'S
) CONCLUSIONS, ETC.

) ~~FILED UNDER SEAL~~

) HEARING:

) DATE: AUGUST 19, 2004

) TIME: 8:30 A.M.

) Place: Dept. SM-2

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

AUG 16 2004

GARY M. BLAIR, Executive Officer

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

1 Michael J. Jackson ("Mr. Jackson") , through his counsel, Thomas A. Mesereau, Jr.
2 hereby applies *ex parte* for leave to file under seal his objection and response to notice o
3 motion and motion of Mr. Jim Anderson for authorization to release attorney general's
4 conclusions, etc. ("Objection"). Filing under seal is necessary because the content of the
5 Objection includes references to matters that may be subject to this Court's Protective
6 Order.

7 This application is based upon the attached declaration of Thomas A. Mesereau, J
8 the files and record in this case and any other information presented prior to a ruling
9 hereon.

10 Dated: August 13, 2004

Respectfully submitted,


11 COLLINS, MESEREAU, REDDOCK & YU
12 Thomas A. Mesereau, Jr.
13 Susan C. Yu

14 KATTEN MUCHIN ZAVIS ROSENMAN
15 Steve Cochran
16 Stacey McKee Knight

17 SANGER & SWYSEN
18 Robert M. Sanger

19 OXMAN & JAROSCAK
20 Brian Oxman

21 By:

22 
23 Thomas A. Mesereau, Jr.
24 Attorneys for MICHAEL JOE JACKSON
25
26
27
28

1 PROOF OF SERVICE

2 I, the undersigned, declare:

3 I am a citizen of the United States of America, am over the age of eighteen (18)
4 years, and not a party to the within action. I am employed at 1875 Century Park East, 7th
5 Floor, Los Angeles, CA 90067. On August 13, 2004, I served the following document:

6 **EX PARTE APPLICATION TO FILE UNDER SEAL OBJECTION AND RESPONSE TO
7 NOTICE OF MOTION AND MOTION OF JIM ANDERSON FOR AUTHORIZATION TO
8 RELEASE ATTORNEY GENERAL'S CONCLUSIONS, ETC.**

9 on the interested parties addressed as follows:

10 Thomas Sneddon, Esq., District Attorney
11 Gerald Franklin, Esq.
12 Ronald Zonen, Esq.
13 Gordon Auchincloss, Esq.
14 District Attorney's Office
15 1105 Santa Barbara Street
16 Santa Barbara, CA 93108
17 FAX: (805) 568-2398

18 BY MAIL: I placed each envelope, containing the foregoing document, with postage
19 fully prepaid, in the United States mail at Los Angeles, California. I am readily familiar
20 with the business practice for collection and processing of mail in this office; that in the
21 ordinary course of business said document would be deposited with the US Postal Service
22 in Los Angeles on that same day.

23 X BY FACSIMILE: I served a copy of the within document on the above-interested
24 parties, by way of a facsimile, at the facsimile numbers listed above.

25 BY MESSENGER/ATTORNEY SERVICE: I caused to personally serve the
26 within document on the above interested parties.

27 X (State) I declare under penalty of perjury under the laws of the State of California
28 that the foregoing is true and correct.

 (Federal) I declare that I am employed in the office of a member of the bar of this
court at whose direction the service was made.

Executed on August 13, 2004, at Los Angeles, California.

22 
23 _____
24 Susan L. Yu