

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

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

AUG 17 2004

GARY M. BLAIR, Executive Officer
BY Carrie L. MacNeil
CARRIE L. MACNEIL, Deputy Clerk

4 Attorneys for Jim Anderson, Sheriff,
5 County of Santa Barbara

6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF SANTA BARBARA
9 (COOK DIVISION)

10
11 **PEOPLE OF THE STATE OF CALIFORNIA,**

12 Plaintiffs,

Case No: 1133603

13 **APPLICATION OF JIM ANDERSON, SHERIFF, COUNTY OF SANTA BARBARA, THAT**
14 **REPLY TO THE DEFENDANT'S**



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21 vs.

22 **MICHAEL JOE JACKSON,**

23 Defendant.

Date: August 19, 2004
Time: 8:30 a.m.
Dept: SM 2

~~FILED UNDER SEAL~~

Assigned Judge: Hon. Rodney S. Melville

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

27 PLEASE TAKE NOTICE THAT Jim Anderson, Sheriff, County of Santa Barbara,
28

COUNTY COUNSEL
County of Santa Barbara
105 E. Anapamu Street
Santa Barbara, CA 93101
568-2950

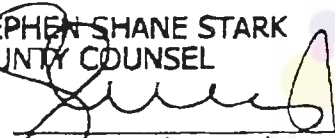
1 hereby requests that this Court authorize the attached Reply to Defendant's

2 [REDACTED]

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

9 Dated: Aug 17, 2004

10 STEPHEN SHANE STARK
COUNTY COUNSEL

11 By 
12 Stephen D. Underwood
13 Chief Assistant County Counsel
14 Attorneys for Jim Anderson, Sheriff,
15 COUNTY OF SANTA BARBARA

16 **DECLARATION OF STEPHEN D. UNDERWOOD**

17 I Stephen D. Underwood, declare:

18 1. I am the attorney for Jim Anderson, Sheriff, County of Santa Barbara.

19 2.

20 [REDACTED]

21 3.

22 [REDACTED]

23 4. The Sheriff's Reply should therefore remain confidential and under seal.

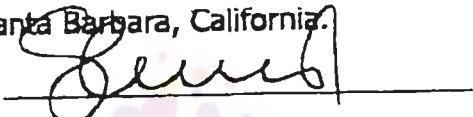
24 5. The Sheriff requests by the within application that the Court conditionally seal
25 the Reply until the matter is heard on August 19, 2004, or as otherwise is
26 ordered by the Court.

27 COUNTY COUNSEL
of Santa Barbara
at Anapamu Street
Barbara, CA 93101
562-2050

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

Executed this 17th day of August 2004, at Santa Barbara, California.



Stephen D. Underwood

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

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

On August 17, 2004 I served a true copy of the **APPLICATION OF JIM ANDERSON, SHERIFF, COUNTY OF SANTA BARBARA, THAT REPLY TO DEFENDANT'S OPPOSITION TO 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; DECLARATION OF STEPHEN D. UNDERWOOD** on the Interested Parties in said action by:

facsimile transmission to the person(s) indicated below:

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

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

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

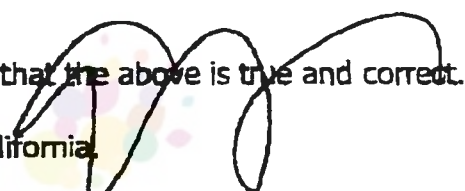
Thomas W. Sneddon, District Attorney
Office of the District Attorney
(805) 568-2398

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

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 17, 2004 at Santa Barbara, California.



Estella Rios