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22 Santa Fe Springs, CA 90670  
23 Tel.: (562) 921-5058, Fax: (562) 921-2298

24 Attorneys for Defendant  
25 **MICHAEL JOSEPH JACKSON**

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiffs,

vs.

MICHAEL JOSEPH JACKSON,  
Defendant.

Case No. 1133603

EX PARTE REQUEST FOR SUBPOENAS

Honorable Rodney S. Melville

Trial Date: January 31, 2004

Time: 8:30 am.

Dept: SM 2

FILED UNDER SEAL

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

AUG 30 2004

GARY M. BLAIR, Executive Officer  
BY Carrie L. Wagner  
CARRIE L. WAGNER, Deputy Clerk

\*Unsealed pursuant  
to 6/16/05 court  
order

1 I, the undersigned, declare as follows:

2 1. I am an attorney at law duly licensed to practice before the courts of the State of  
3 California and an attorney at the law firm of Sanger & Swysen, one of the attorneys of  
4 record representing the defendant Michael Joseph Jackson in the above-entitled case.

5 2. Based on my preparation and knowledge concerning the facts of this case, I am  
6 informed and believe that the testimony of the following witnesses, who reside out of  
7 Santa Barbara County, is material and necessary to the defense at the trial of this  
8 matter:

9 a. Janet Ventura Arvizo Jackson, [REDACTED] Los Angeles, CA 90025

10 b. Jay Jackson, [REDACTED] Los Angeles, CA 90025

11 3. Therefore, I respectfully request the Court for an order endorsing the subpoenas  
12 submitted concurrently herewith compelling the appearance of Janet Ventura Arvizo  
13 Jackson and Jay Jackson.

14 I declare under penalty of perjury that the foregoing is true and correct, except to those  
15 matters stated on information and belief, and those matters, I believe them to be true.

16 Executed on August 24, 2004, at Santa Barbara, California.

17 Dated: August 24, 2004

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

KATTEN MUCHIN ZAVIS ROSENMAN  
Steve Cochran  
Stacey McKee Knight

SANGER & SWYSEN  
Robert M. Sanger

OXMAN & JAROSCAK  
Brian Oxman

24  
25 By

  
Robert M. Sanger  
Attorneys for Defendant  
MICHAEL JOSEPH JACKSON

|   |                               |                    |
|---|-------------------------------|--------------------|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address):<br><b>COLLINS MESEREAU, REDDOCK &amp; YU</b><br>1875 Century Park East, 7th Floor<br>Los Angeles, CA 90087   | TELEPHONE NO.<br>310-284-3120 | FOR COURT USE ONLY |
| ATTORNEY FOR (Name): <b>Michael Joseph Jackson</b>  |                               |                    |
| COURT (Name of court, Justice, District or Branch court, if any, and full office and address if known):<br><b>Santa Barbara Superior Court - Cook Division</b><br>312 East Cook Street<br>Santa Maria, CA |                               |                    |
| Title of case:<br><b>People v. Michael Joseph Jackson</b>   |                               |                    |
| SUBPENA (CRIMINAL OR JUVENILE)<br><br><input type="checkbox"/> DUCES TECUM  | CASE NUMBER<br><b>1133609</b> |                    |

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (NAME):

**Janet Ventura Arlyza Jackson**

1. YOU ARE ORDERED TO APPEAR AS A WITNESS in this action at the date, time, and place shown in the box below UNLESS you make a special agreement with the person named in Item 3:

|   |   |   |   |                                |
|---|---|---|---|--------------------------------|
| a. Date: <b>January 31, 2005</b>                                  | Time: <b>8:30 a.m.</b>                                | <input checked="" type="checkbox"/> Dept: | <input checked="" type="checkbox"/> Div.: <b>Cook</b> | <input type="checkbox"/> Room: |
| b. Address: <b>312 East Cook Street</b><br><b>Santa Maria, CA</b> | **Or other Department where Judge Melville is sitting |   |   |                                |

2. AND YOU ARE

- a.  ordered to appear in person.
- b.  not required to appear in person if you produce the records described in the accompanying affidavit and a completed declaration of custodian of records in compliance with Evidence Code sections 1580, 1581, 1582, and 1271. (1) Place a copy of the records in an envelope (or other wrapper). Enclose your original declaration with the records. Seal them. (2) Attach a copy of this subpoena to the envelope or write on the envelope the case name and number, your name and date, time, and place from item 1 (the box above). (3) Place this first envelope in an outer envelope, seal it, and mail it to the clerk of the court at the address in Item 1. (4) Mail a copy of your declaration to the attorney or party shown at the top of this form.
- c.  ordered to appear in person and to produce the records described in the accompanying affidavit. The personal attendance of the custodian or other qualified witness and the production of the original records is required by this subpoena. The procedure authorized by subdivision (b) of section 1580, and sections 1581 and 1582, of the Evidence Code will not be deemed sufficient compliance with this subpoena.
- d.  ordered to make the original business records described in the accompanying affidavit available for inspection at your business address by the attorney's representative and to permit copying at your business address under reasonable, normal business hours, conditions during normal business hours.

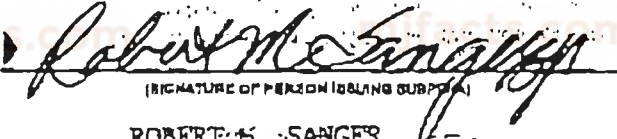
3. IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:

a. Name: **Eric Mason**

b. Telephone number: **510-855-1700**

4. WITNESS FEES: You may be entitled to witness fees, mileage, or both, in the discretion of the court. Contact the person named in Item 3 AFTER your appearance.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED BY A FINE, IMPRISONMENT, OR BOTH. A WARRANT MAY ISSUE FOR YOUR ARREST IF YOU FAIL TO APPEAR.

|  |   |
|--|---|
| FOR COURT USE ONLY<br>Date: <b>August 24, 2004</b> | <br>(SIGNATURE OF PERSON ISSUING SUBPENA)<br><b>ROBERT H. SANGER</b><br>(TYPE OR PRINT NAME)<br>Attorney for Defendant<br>(TITLE) |
|--|---|

(See reverse for proof of service)

|   |                                |
|---|--------------------------------|
| <b>SHORT TITLE:</b><br>People v. Michael Joseph Jackson | <b>CASE NUMBER:</b><br>1133603 |
|---|--------------------------------|

**PROOF OF SERVICE OF SUBPENA**

1. I served this  Subpena  Subpena Duces Tecum and supporting affidavit by personally delivering a copy to the person served as follows:

- a. Person served (name):
- b. Address where served:
- c. Date of delivery:
- d. Time of delivery:

2. I received this subpoena for service on (date):

3.  **NON-SERVICE RETURN OF SUBPENA**

a.  After due search, careful inquiry, and diligent attempts at the dwelling house or usual place of abode or usual place of business, I have been unable to make personal delivery of this  Subpena  Subpena Duces Tecum in this county on the following persons (specify):

b. Reason:

- (1)  Unknown at address.
- (2)  Moved, forwarding address unknown.
- (3)  No such address.
- (4)  Out-of-county address.
- (5)  Unable to serve by hearing date.
- (6)  Other reasons (explanation required):

4. Person serving:

- a.  Not a registered California process server.
- b.  California sheriff, marshal, or constable.
- c.  Registered California process server.
- d.  Employee or independent contractor of a registered California process server.
- e.  Exempt from registration under Bus. & Prof. Code section 22350(b).
- f. Name, address, and telephone number and, if applicable, county of registration and number.

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

(For California sheriff, marshal, or constable use only)  
 I certify that the foregoing is true and correct.

Date:

Date:

\_\_\_\_\_  
 (SIGNATURE)

\_\_\_\_\_  
 (SIGNATURE)

|  |                                |                    |
|--|--------------------------------|--------------------|
| ATTORNEY OR PARTY, WITHOUT ATTORNEY (Name and Address)<br>COLLINS MESEREAU, REDDOCK & YU<br>1875 Century Park East, 7th Floor<br>Los Angeles, CA 90067                                       | TELEPHONE NO.:<br>310-284-3120 | FOR COURT USE ONLY |
| ATTORNEY FOR (Name): Michael Joseph Jackson  |                                |                    |
| Name of court, justice of the peace, or branch court, if any, and full street and street address:<br>Santa Barbara Superior Court - Cook Division<br>312 East Cook Street<br>Santa Maria, CA |                                |                    |
| Title of case:<br>People v. Michael Joseph Jackson   |                                |                    |
| SUBPENA (CRIMINAL OR JUVENILE)<br><input type="checkbox"/> DUCES TECUM   | CASE NUMBER:<br>1133803        |                    |

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (NAME):

Jay Jackson

1. YOU ARE ORDERED TO APPEAR AS A WITNESS in this action at the date, time, and place shown in the box below UNLESS you make a special agreement with the person named in Item 3:

|   |   |   |  |                                |
|---|---|---|--|--------------------------------|
| a. Date: January 31, 2005                           | Time: 8:30 a.m.                                       | <input checked="" type="checkbox"/> Dept: | <input checked="" type="checkbox"/> Div.: Cook | <input type="checkbox"/> Room: |
| b. Address: 312 East Cook Street<br>Santa Maria, CA | **Or other Department where Judge Melville is sitting |   |  |                                |

2. AND YOU ARE

- ordered to appear in person.
- not required to appear in person if you produce the records described in the accompanying affidavit and a completed declaration of custodian of records in compliance with Evidence Code sections 1580, 1581, 1582, and 1271. (1) Place a copy of the records in an envelope (or other wrapper). Enclose your original declaration with the records. Seal them. (2) Attach a copy of this subpoena to the envelope or write on the envelope the case name and number, your name and date, time, and place from Item 1 (the box above). (3) Place this first envelope in an outer envelope, seal it, and mail it to the clerk of the court at the address in Item 1. (4) Mail a copy of your declaration to the attorney or party shown at the top of this form.
- ordered to appear in person and to produce the records described in the accompanying affidavit. The personal attendance of the custodian or other qualified witness and the production of the original records is required by this subpoena. The procedure authorized by subdivision (b) of section 1580, and sections 1581 and 1582, of the Evidence Code will not be deemed sufficient compliance with this subpoena.
- ordered to make the original business records described in the accompanying affidavit available for inspection at your business address by the attorney's representative and to permit copying at your business address under reasonable, normal business hours, conditions during normal business hours.

3. IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE, ON WHICH YOU ARE TO APPEAR:

a. Name: Eric Mason

b. Telephone number: 510-855-1700

4. WITNESS FEES: You may be entitled to witness fees, mileage, or both, in the discretion of the court. Contact the person named in item 3 AFTER your appearance.

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED BY A FINE, IMPRISONMENT, OR BOTH. A WARRANT MAY ISSUE FOR YOUR ARREST IF YOU FAIL TO APPEAR.

FOR COURT USE ONLY

Date: August 24, 2004



(SIGNATURE OF PERSON ISSUING SUBPENA)

ROBERT M. SANGER

(TYPE OR PRINT NAME)

Attorney for Defendant

(See reverse for proof of service)

(mm)

|   |                                |
|---|--------------------------------|
| <b>SHORT TITLE:</b><br>People v. Michael Joseph Jackson | <b>CASE NUMBER:</b><br>1133803 |
|---|--------------------------------|

**PROOF OF SERVICE OF SUBPENA**

1. I served this  Subpena  Subpena Duces Tecum and supporting affidavit by personally delivering a copy to the person served as follows:

- a. Person served (name):
- b. Address where served:
- c. Date of delivery:
- d. Time of delivery:

2. I received this subpoena for service on (date):

3.  **NON-SERVICE RETURN OF SUBPENA**

a.  After due search, careful inquiry, and diligent attempts at the dwelling house or usual place of abode or usual place of business, I have been unable to make personal delivery of this  Subpena  Subpena Duces Tecum in this county on the following persons (specify):

b. Reason:

- |   |  |
|---|--|
| (1) <input type="checkbox"/> Unknown at address.                | (4) <input type="checkbox"/> Out-of-county address.                |
| (2) <input type="checkbox"/> Moved, forwarding address unknown. | (5) <input type="checkbox"/> Unable to serve by hearing date.      |
| (3) <input type="checkbox"/> No such address.                   | (6) <input type="checkbox"/> Other reasons (explanation required): |

4. Person serving:

- |   |  |
|---|--|
| a. <input type="checkbox"/> Not a registered California process server.                                   | e. <input type="checkbox"/> Exempt from registration under Bus. & Prof. Code section 22350(b). |
| b. <input type="checkbox"/> California sheriff, marshal, or constable.                                    |  |
| c. <input type="checkbox"/> Registered California process server.   |  |
| d. <input type="checkbox"/> Employee or independent contractor of a registered California process server. | f. Name, address, and telephone number and, if applicable, county of registration and number:  |

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

(For California sheriff, marshal, or constable use only)  
 I certify that the foregoing is true and correct.

Date:

Date:

\_\_\_\_\_  
 (SIGNATURE)

\_\_\_\_\_  
 (SIGNATURE)