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12 Attorneys for Defendant  
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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 FOR THE COUNTY OF SANTA BARBARA  
16 SANTA MARIA DIVISION

17 THE PEOPLE OF THE STATE OF  
18 CALIFORNIA,

19 Plaintiff,

20 vs.

21 MICHAEL J. JACKSON

22 Defendant.

CASE NO. 1133603

**EX PARTE APPLICATION FOR  
LEAVE TO FILE UNDER SEAL  
MR. JACKSON'S APPLICATION  
FOR AN OSC RE SANCTIONS  
FOR VIOLATION OF THIS  
COURT'S PROTECTIVE ORDER  
DECLARATION OF COUNSEL**

**FILED UNDER SEAL**

mjfacts.com  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA

SEP 07 2011

GARY M. BLAIR, Executive Officer  
*Carrie L. Moore*  
CARRIE L. MOORE, County Clerk

1 Defendant Michael J. Jackson, through his counsel, hereby applies ex parte for  
2 leave to file under seal his application for an order to show cause re contempt and/or  
3 other sanctions for violation of this Court's protective order. Filing under seal is  
4 necessary because the content of the application includes reference to under seal and  
5 other information subject to this Court's protective order.

6 This application is based upon the attached declaration of Robert M. Sanger  
7 the file and record in this case and any other information presented prior to a ruling  
8 hereon.

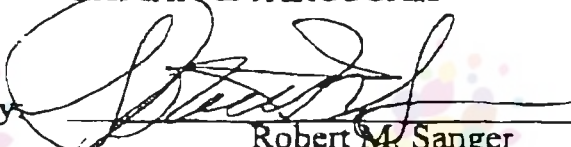
9 September 7, 2004

Respectfully submitted,

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

13 Robert M. Sanger  
14 SANGER & SWYSEN

Brian Oxman  
OXMAN & JAROSCAK


15  
16 By   
17 Robert M. Sanger  
18 Attorneys for Defendant  
19 MICHAEL J. JACKSON



1 application refers to public statements of Mr. Thomas that indicate he is receiving  
2 information from the sheriff's department and revealing that information on  
3 television and to the print media. Because the application refers to matters that are  
4 under seal or subject to this Court's protective order, leave is requested to file the  
5 application under seal.

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

7 Executed this 7<sup>th</sup> day of September, 2004, at Santa Barbara, California.

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10   
11 Robert M. Sanger