

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

SEP 21 2004

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

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MICHAEL JOE JACKSON

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

) ~~PROPOSED~~ REDACTED VERSION OF
THOMAS A. MESEREAU, JR.'S REQUEST
TO MAKE A PUBLIC STATEMENT

) FILED UNDER SEAL & BY FAX

24 HEARING:

25) DATE: SEPTEMBER 21, 2004

26) TIME: 9:30 A.M.

27) Place: Dept. SM-2

1 On behalf of Mr. Michael J. Jackson ("Mr. Jackson"), lead counsel, Thomas A.
2 Mesereau, Jr., respectfully requests that the Court permit him to make a public statement,
3 which is attached hereto as Exhibit A. This statement has been prepared so as to avoid
4 issues of concern in this criminal matter.

5 The defense learned yesterday that false and inflammatory story is circulating
6 throughout the media regarding photographs allegedly seized from Mr. Jackson's
7 residence.

8
9 These articles are designed to spread falsehoods about Mr. Jackson and the
10 evidence in this case. They are highly prejudicial to Mr. Jackson because they inflame the
11 public and poison the jury pool. Accordingly, Mr. Mesereau respectfully requests the
12 Court to permit him to respond to these falsehoods. The attached proposed statement is
13 short, concise and consistent with the spirit and letter of this
14 Court's Protective Order.

15 DATED: September 21, 2004

Respectfully submitted,


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

19 Steve Cochran
20 Stacey McGee Knight
21 KATTEN MUCHIN ZAVIS ROSENMAN

22 Robert M. Sanger
23 SANGER & SWYSEN

24 Brian Oxman
25 OXMAN & JAROSCAK

26 By:

27 
28 Thomas A. Mesereau, Jr.
Attorneys for Mr. MICHAEL J. JACKSON

29 A proposed Redacted version of Mr. Mesereau's Request to Make a Public statement is
30 concurrently filed herewith.



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EXHIBIT'S A & B EXCLUDED



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PROOF OF SERVICE

I, the undersigned, declare:

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

[PROPOSED] REDACTED VERSION OF THOMAS A. MESEREAU, JR.'S REQUEST TO MAKE A PUBLIC STATEMENT

on the interested parties addressed as follows:

Thomas Sneddon, Esq., District Attorney
Gerald Franklin, Esq.
Ronald Zonen, Esq.
Gordon Auchincloss, Esq.
District Attorney's Office
1105 Santa Barbara Street
Santa Barbara, CA 93108
FAX: (805) 568-2398

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

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

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

 X (State) I declare under penalty of perjury under the laws of the State of California 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 September 21, 2004, at Los Angeles, California.



Susan C. Yu