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FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA

OCT 04 2024

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

14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 FOR THE COUNTY OF SANTA BARBARA
16 SANTA MARIA DIVISION

18 THE PEOPLE OF THE STATE OF
CALIFORNIA,

19 Plaintiff,

20 vs.

21 MICHAEL JOSEPH JACKSON

22 Defendant.

CASE NO. 1133603

**EX PARTE APPLICATION FOR
LEAVE TO FILE UNDER SEAL
MR. JACKSON'S MOTION TO
COMPEL DISCOVERY
DECLARATION OF ROBERT
SANGER**

~~FILED UNDER SEAL~~

25 Defendant Michael J. Jackson, through his counsel, hereby applies ex parte for
26 leave to file under seal his motion to compel discovery. Filing under seal is
27
28

1 necessary because the content of the motion includes reference to details in under
2 seal material about the investigation, including discovery materials.

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

6 Dated: October 4, 2004

Respectfully submitted,

7 Thomas A. Mesereau, Jr.
8 Susan Yu
9 COLLINS, MESEREAU, REDDOCK & YU

10 Robert M. Sanger
11 SANGER & SWYSEN

12 Brian Oxman
13 OXMAN & JAROSCAK

14 By: 

15 Robert M. Sanger
16 Attorneys for Defendant
17 MICHAEL JOSEPH JACKSON

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DECLARATION OF ROBERT M. SANGER

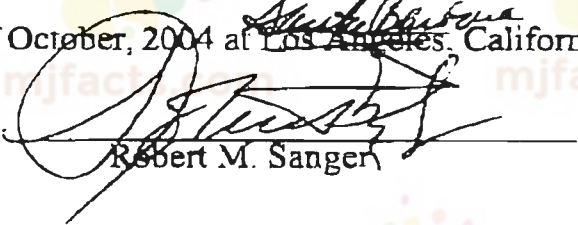
I, Robert M. Sanger, declare as follows:

1. I am an attorney duly authorized to practice before all courts of the State of California and co-counsel for Michael J. Jackson. I submit this declaration in support of an ex parte application for leave to file under seal Mr. Jackson's motion to compel discovery.

2. The motion papers describe materials that have been maintained under seal by this Court. Details about the investigation and other discovery are mentioned in the moving papers. Therefore, in accordance with the practice directed by this Court, leave is sought to file this motion under seal.

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

Executed this 4th day of October, 2004 at Los Angeles, California.


Robert M. Sanger