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10 Attorneys for Defendant
11 MICHAEL JOE JACKSON

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF SANTA BARBARA
14 SANTA MARJA DIVISION

15 THE PEOPLE OF THE STATE OF
CALIFORNIA,
16
Plaintiff,
17
vs.
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MICHAEL JOE JACKSON
19
Defendant.

CASE NO. 1133603
} EX PARTE APPLICATION TO FILE UNDER
} SEAL NOTICE OF MOTION AND MOTION
} RE DISCLOSURE OF INFORMANTS;
} [PROPOSED] ORDER
} [NOTICE OF MOTION AND MOTION RE
} DISCLOSURE OF INFORMANTS' IDENTITIES
} FILED CONCURRENTLY HEREWITH]
} HEARING:
} DATE: OCTOBER 14, 2004
} TIME: 8:30 A.M.
} Place: Dept. SM-2
} FILED UNDER SEAL & BY FAX

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

OCT 04 2004

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

1 Michael J. Jackson ("Mr. Jackson"), through his counsel, Susan C. Yu, hereby
2 applies *ex parte* for leave to file under seal his notice of motion and motion compelling
3 disclosure of informants' identities or, in the alternative, dismissing the accusatory
4 pleading; memorandum of points and authorities; declaration of Susan C. Yu in support
5 thereof ("Informant Motion"). Filing under seal is necessary because the content of the
6 Informant Motion includes references to matters that are subject to this Court's Protective
7 Order.

8 This application is based upon the attached declaration of Susan C. Yu the files and
9 record in this case and any other information presented prior to a ruling hereon.

10 Dated: October 4, 2004

Respectfully submitted,

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

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14 SANGER & SWYSEN
Robert M. Sanger

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16 OXMAN & JAROSCAK
Brian Oxman

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18 By:


Susan C. Yu
Attorneys for MICHAEL JOE JACKSON

1 DECLARATION OF SUSAN C. YU

2 I, Susan C. Yu declare:

3 1. I am an attorney at law duly licensed to practice law in the courts of the
4 State of California, a partner in the law firm of Collins, Mesereau, Reddock & Yu, and co-
5 counsel for Mr. Michael Jackson in this criminal proceeding. I submit this declaration in
6 support of an *ex parte* application for leave to file under seal Mr. Jackson's Informant
7 Motion.

8 2. The moving papers describe materials that are subject to this Court's
9 Protective Order. Therefore, in accordance with the directives by this Court, leave is
10 sought to file this motion under seal.

11 I declare under penalty of perjury that the foregoing is true and correct and that this
12 declaration was executed this 4th day of October, 2004 at Los Angeles, California.

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15 Susan C. Yu