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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.
23

CASE NO. 1133603

**EX PARTE APPLICATION FOR
LEAVE TO FILE UNDER SEAL
MR. JACKSON'S RESPONSE TO
OBJECTIONS RE: SERVICE OF
RECUSAL MOTION AND
REQUEST TO RE-CALENDAR
HEARING**

~~FILED UNDER SEAL~~

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

OCT 12 2004

GARY M. BLAIR, Executive Officer

By *Carrie L. Wagner*
CARRIE L. WAGNER, Deputy Clerk

1 Defendant Michael J. Jackson, through his counsel, hereby applies ex parte for
2 leave to file under seal his application for a response to objections re: service of
3 recusal motion and request to re-calendar hearing. Filing under seal is necessary
4 because the content of the application includes reference to under seal and other
5 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 October 11, 2004

Respectfully submitted,

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

13 Robert M. Sanger
14 SANGER & SWYSEN

15 ~~Brian Oxman~~
16 OXMAN & JAROSCAK

17 By: 

18 Robert M. Sanger
19 Attorneys for Defendant
20 MICHAEL J. JACKSON

1 **DECLARATION OF ROBERT M. SANGER**

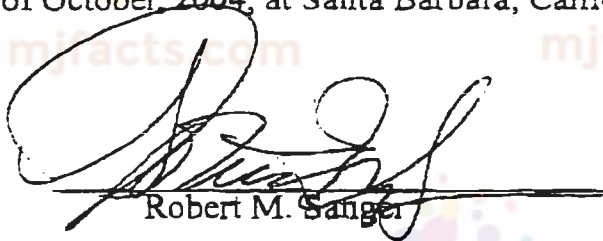
2 I, Robert M. Sanger declare as follows:

3 I am an attorney duly authorized to practice before all courts of the State
4 of California and am a partner of the law firm of Sanger & Swysen, co-counsel for
5 Michael J. Jackson. I submit this declaration in support of an ex parte application
6 for leave to file under seal Mr. Jackson's application for a response to objections re:
7 service of recusal motion and request to re-calendar hearing.

8 2. The motion papers describe information that has been maintained under
9 seal by this Court. Therefore, in accordance with the practice directed by this Court,
10 leave is sought to file this motion under seal.

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

12 Executed this 4 day of October, 2004, at Santa Barbara, California.

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16 Robert M. Sanger
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