

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY OF SANTA BARBARA

OCT 25 2004 ^{ed}

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

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* Unsealed pursuant
to 6/16/05 Court
Order

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 IN AND FOR THE COUNTY OF SANTA BARBARA
16
17 COOK DIVISION

18 THE PEOPLE OF THE STATE OF CALIFORNIA,)

19 Plaintiff,

20 vs.

21 MICHAEL JACKSON,

22 Defendant.

Case No.: 1133603

APPLICATION TO FILE UNDER SEAL AND
WITHOUT NOTICE TO THE PEOPLE; NOTICE
OF MOTION AND MOTION TO QUASH
SUBPOENA AND/OR IN CAMERA REVIEW;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
RAYMOND CHANDLER; PROPOSED ORDER

23 **SEALED** *In Camera*

24 Dated: November 4, 2004

25 Time: 8:30 a.m.

26 Dept.: SM-2

27 Judge: Honorable Rodney Melville

28 Raymond Chandler, a non-party to this proceeding, hereby submits this application for an order allowing him to file under seal a Notice Of Motion and Motion to Quash Subpoena Duces Tecum served on him by the Defendant Michael Jackson, and allowing him to file that Application without notice to the People.

1 On or about September 19, 2004 Raymond Chandler was served, in his capacity as a custodian of
2 records, with a Subpoena Duces Tecum and related documents. The response to the Subpoena is due on
3 October 25, 2004 at 9:00 a.m., in Dept. SM-2.

4 On July 9, 2004 the Superior Court, the Hon. Judge Rodney Melville presiding, issued a
5 Protective Order Regarding Defendant's Subpoenas Duces Tecum, a copy of which was attached to the
6 subpoena identified herein as Exhibit 1. That Protective Order states, in part:


7 "3. Persons or entities subpoenaed by the Defendant shall not disclose directly or indirectly to
8 the People the fact that they have been subpoenaed or the nature of the subpoena.

9 4. Any appearance, objection, compliance, or other communication by a party subpoenaed by
10 the defendant shall be filed under seal."

11 Attached to this Application is a proposed Order.

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13 Date: 10/25, 2004

LAW OFFICE OF HERB FOX

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16 Herb Fox, Attorney for
17 Raymond Chandler