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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 MARIA DIVISION

15 THE PEOPLE OF THE STATE OF  
16 CALIFORNIA,

17 Plaintiff,

18 vs.

19 MICHAEL JOE JACKSON

20 Defendant.

} CASE NO. 1133603

} EX PARTE APPLICATION TO FILE UNDER  
} SEAL DECLARATION OF SUSAN C. YU;  
} ~~[PROPOSED]~~ ORDER

} HEARING:

} DATE: JANUARY 12, 2005

} TIME: 8:30 A.M.

} Place: Dept. SM-2

~~FILED UNDER SEAL & BY FAX~~

**FILED**  
SUPERIOR COURT of CALIFORNIA  
COUNTY of SANTA BARBARA

JAN 12 2005

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

1 Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies *ex parte* for  
2 leave to file conditionally under seal the Declaration of Susan C. Yu regarding the  
3 Prosecution's Response to Motion to Compel Discovery, as well as the supporting exhibits  
4 A and B. ("Yu Declaration.") Filing conditionally under seal is necessary because the  
5 content of the Yu Declaration may include references to matters that are subject to this  
6 Court's Protective Order.

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

9 Dated: January 12, 2005

Respectfully submitted,

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

13 SANGER & SWYSEN  
14 Robert M. Sanger

15 OXMAN & JAROSCAK  
16 Brian Oxman

17 By:



18 Susan C. Yu  
19 Attorneys for MICHAEL JOE JACKSON  
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DECLARATION OF SUSAN C. YU

I, Susan C. Yu declare:

1. I am an attorney at law duly licensed to practice law in the courts of the State of California, a partner in the law firm of Collins, Mesereau, Reddock & Yu, and co-counsel for Mr. Michael Jackson in this criminal proceeding. I submit this declaration in support of an *ex parte* application for leave to file conditionally under seal the Declaration of Susan C. Yu regarding the Prosecution's Response to Motion to Compel Discovery, as well as the supporting exhibits A and B. The Yu Declaration may contain materials that are subject to this Court's Protective Order. Therefore, in accordance with the directives by this Court, leave is sought to file the Declaration conditionally under seal.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 12<sup>th</sup> day of January, 2005 at Los Angeles, California.

  
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Susan C. Yu