

1 Thomas A. Mesereau, Jr. (SBN 91182)  
2 Susan C. Yu (SBN 195640)  
3 COLLINS, MESEREAU, REDDOCK & YU, LLP  
4 1875 Century Park East, 7<sup>TH</sup> Floor  
5 Los Angeles, California 90067  
6 Tel: (310) 284-3120; Fax: (310) 284-3133

7 Robert M. Sanger (SBN 58214)  
8 SANGER & SWYSEN  
9 233 E. Carrillo St., Suite C  
10 Santa Barbara, CA 93101  
11 Tel: (805) 962-4887; Fax: (805) 963-7311

12 Brian Oxman (SBN 072172)  
13 OXMAN & JAROSCAK  
14 14126 East Rosecrans  
15 Santa Fe Springs, California 90670  
16 Tel: (562) 921-5058; Fax: (562) 921-2298

17 Attorneys for Defendant  
18 MICHAEL JOE JACKSON

19 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
20 FOR THE COUNTY OF SANTA BARBARA  
21 SANTA MARIA DIVISION

22 THE PEOPLE OF THE STATE OF CALIFORNIA,  
23  
24 Plaintiff,  
25  
26 vs.  
27 MICHAEL JOE JACKSON  
28 Defendant.

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SANTA BARBARA  
JAN 13 2005  
GARY M. BLAIR, Executive Officer  
*Carrie L. Wagner*  
CARRIE L. WAGNER, Deputy Clerk

CASE NO. 1133603  
EX PARTE APPLICATION TO FILE UNDER  
SEAL THOMAS A. MESEREAU, JR.'S  
REQUEST TO MAKE A PUBLIC  
STATEMENT; [PROPOSED] ORDER  
THEREON

~~FILED UNDER SEAL BY FAX~~  
HEARING:  
DATE: JANUARY 13, 2005  
TIME: 3:00 P.M.  
Place: Dept. SM-2

1 On behalf of Mr. Michael J. Jackson ("Mr. Jackson"), lead counsel, Thomas A.  
2 Mesereau, Jr., hereby applies *ex parte* for leave to file under seal a request that he be  
3 permitted to make a public statement. Until the Court orders otherwise, the Request must  
4 be filed under seal because the content therein includes references to matters that are  
5 subject to this Court's Protective Order. Concurrently filed herewith are the Request and  
6 the redacted version of the Request.

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

9 Dated: January 13, 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  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF SUSAN C. YU**

1  
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, Raddock & Yu, and co-  
5 counsel for Mr. Michael Jackson. I submit this declaration in support of an *ex parte*  
6 application for leave to file under seal a request that Thomas A. Mesereau, Jr., Mr.  
7 Jackson's lead counsel, be permitted to make a public statement.

8 2. The Request describes materials that are subject to this Court's Protective  
9 Order. Therefore, in accordance with the directives by this Court, leave is sought to file  
10 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 13<sup>th</sup> day of January, 2005 at Los Angeles, California.

13  
14   
15 Susan C. Yu  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28