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

JAN 26 2005

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18 Attorneys for Defendant  
19 **MICHAEL JOSEPH JACKSON**

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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiffs,

vs.

MICHAEL JOSEPH JACKSON,

Defendant.

) Case No. 1133603

) EX PARTE APPLICATION TO FILE UNDER SEAL

) Honorable Rodney S. Melville

) Date: January 28, 2005

) Time: 8:30 a.m.

) Dept: SM 2

TO THE CLERK OF THE ABOVE ENTITLED COURT:

Defendant requests that the Court issue an order that the accompanying Mr. Jackson's Reply in Support of Motion in Limine to Preclude Reference to Materials as Pornographic and

EX PARTE APPLICATION TO FILE UNDER SEAL

1 accompanying documents to be filed under seal and for such other such further relief as the Court  
2 may deem just and proper. This request is based on the overriding interests of Mr. Jackson's rights  
3 to due process and a fair trial under the Fifth, Sixth and Fourteenth Amendments to the United States  
4 Constitution and Article I, Sections 1, 7, and 15 of the California Constitution.

5  
6 Dated: January 26, 2005

7 Respectfully submitted,

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

10 SANGER & SWYSEN  
11 Robert M. Sanger

12 OXMAN & JAROSCAK  
13 Brian Oxman

14 By: 

15 R. Brian Oxman  
16 Attorneys for Defendant  
17 Mr. Michael Jackson

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EX PARTE APPLICATION TO FILE UNDER SEAL



1 United States Constitution and Article I, Sections 1, 7, and 15 of the California Constitution.  
2 Material contained the accompanying document pertains to evidence and the testimony of  
3 witnesses that, if made public, would compromise Mr. Jackson's these rights and would result in  
4 prejudice to Mr. Jackson. In order to protect these overriding interests, it is necessary that the  
5 accompanying document be filed under seal.

6 CONCLUSION

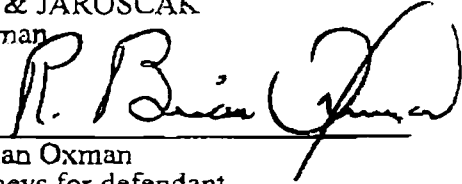
7 For the foregoing reasons, Mr. Michael Jackson requests his Reply in Support of Motion  
8 in Limine to Preclude Reference to Materials as Pornographic and accompanying documents be  
9 filed under seal.

10 Dated: January 26, 2005

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

13 SANGER & SWYSEN  
14 Robert M. Sanger

15 OXMAN & JAROSCAK  
16 Brian Oxman

17 By:   
18 R. Brian Oxman  
19 Attorneys for defendant,  
20 Mr. Michael Jackson  
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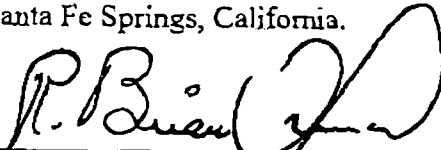
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DECLARATION OF BRIAN OXMAN

I, Brian Oxman, declare:

1. I am an attorney at law duly licensed to practice law in the courts of the State of California, and an attorney for Michael Jackson.
2. It is necessary that the accompanying Reply in Support of Motion in Limine to Preclude Reference to Materials as Pornographic accompanying documents be filed under seal in order to protect the overriding interests of Mr. Jackson's rights to due process and a fair trial, as well as to prevent the disclosure of witnesses, potential witnesses and potential evidence.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 26th day of January, 2005 at Santa Fe Springs, California.

  
\_\_\_\_\_  
R. Brian Oxman

EX PARTE APPLICATION TO FILE UNDER SEAL

