

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY  
County of Santa Barbara  
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Senior Deputy District Attorney  
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Senior Deputy District Attorney  
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FILED  
SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SANTA BARBARA  
FEB 10 2005  
CARRIE L. WAGNER, Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF SANTA BARBARA  
10 SANTA MARIA DIVISION

11 ~~PROPOSED~~ REDACTED VERSION

12 THE PEOPLE OF THE STATE OF CALIFORNIA, )  
13 Plaintiff, )  
14 v. )  
15 MICHAEL JOE JACKSON, )  
16 Defendant. )

No. 1133603  
PLAINTIFF'S MOTION TO  
EXCLUDE ANY REFERENCE BY  
DEFENSE COUNSEL TO [REDACTED]  
[REDACTED]  
DATE: February 10, 2005  
TIME: 9:30 a.m.  
DEPT: TBA (Melville)

19 UNDER SEAL

20 TO: THE CLERK OF THE SUPERIOR COURT AND TO DEFENDANT AND HIS  
21 COUNSEL:

22 PLEASE TAKE NOTICE that on February 10, 2005, Plaintiff will move the court  
23 for its order forbidding counsel to inquire about [REDACTED]  
24 [REDACTED]


25 The motion will be based on this notice and the accompanying Memorandum of  
26 Points and Authorities.

27 ////  
28 ////

DATED: January 31, 2005

Respectfully submitted,

THOMAS W. SNEDDON, JR.  
District Attorney

By:   
Ronal J. Zonen, Senior Deputy

Attorneys for Plaintiff

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1 MEMORANDUM OF POINTS AND AUTHORITIES

2 DEFENSE COUNSELS' SUGGESTION THAT [REDACTED]

3 [REDACTED]

4 MORE IMPORTANTLY,

5 THE ALLEGATION IS IRRELEVANT TO ANY ISSUE  
6 IN THE PENDING PROCEEDING

7 A. Introduction

8 This motion is based on defense counsels' allegation in their [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 By their Opposition, defense counsel have manifested their intention to explore this

24 area in their cross-examination of Jane Doe unless expressly prohibited from doing so by order

25 of this Court.

26 [REDACTED]

27 [REDACTED]

28 [REDACTED]

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DATED: January 31, 2005

THOMAS W. SNEDDON, JR.  
District Attorney

By: 151  
Ronald J. Zonen, Senior Deputy  
Attorneys for Plaintiff

PROOF OF SERVICE

STATE OF CALIFORNIA }  
COUNTY OF SANTA BARBARA } SS

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and I am not a party to the within-entitled action. My business address is: District Attorney's Office; Courthouse; 1112 Santa Barbara Street, Santa Barbara, California 93101.

*Redacted*

On January 31, 2005, I served the within PLAINTIFF'S MOTION TO

[Redacted]

on Defendant, by THOMAS A. MESEREAU, JR., ROBERT SANGER and BRIAN OXMAN, by personally delivering a true copy thereof to the attorney representing Defendant in the jury selection proceedings in court.

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

Executed at Santa Maria, California on this 31st day of January, 2005.

*Gerald M. C. [Signature]*

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**SERVICE LIST**

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FAX: [CONFIDENTIAL]

Attorney for Defendant Michael Jackson

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Co-counsel for Defendant

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Co-counsel for Defendant