

1 THOMAS W. SNEDDON, JR., DISTRICT ATTORNEY
County of Santa Barbara
2 By: RONALD J. ZONEN (State Bar No. 85094)
Senior Deputy District Attorney
3 J. GORDON AUCHINCLOSS (State Bar No. 150251)
Senior Deputy District Attorney
4 GERALD McC. FRANKLIN (State Bar No. 40171)
Senior Deputy District Attorney
5 1112 Santa Barbara Street
Santa Barbara, CA 93101
6 Telephone: (805) 568-2300
FAX: (805) 568-2398
7

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

FEB - 9 2005
GARY M. DAVIS, Executive Officer
CARRIE L. WAGNER, County Clerk

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

11
12 THE PEOPLE OF THE STATE OF CALIFORNIA,) No. 1133603
13 Plaintiff,)
14)
15 v)
16 MICHAEL JOE JACKSON,)
17 Defendant.)
18

19
20 The People respectfully request leave to file Plaintiff's Reply to Motion to Limit
21 Introduction of Evidence Involving The Doc Family a day after the cut-off date fixed by the
22 briefing schedule.

23 As described in the accompanying Declaration, the establishment of the
24 "residence/satellite office" in Santa Maria for the District Attorney's trial lawyers has both its
25 advantages and disadvantages. Among the disadvantages is a delay in transmitting documents
26 received from the defense, conferring on the appropriate response thereto and finalizing draft
27 versions of a given response and putting it into an acceptable format for service and filing.

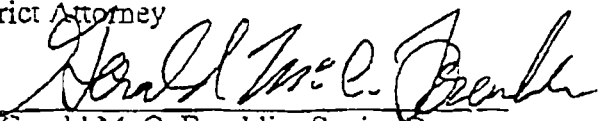
28 The accompanying Plaintiff's Reply to Motion to Limit Introduction of Evidence

1 Involving The Doc Family was served on Defendant in timely fashion on February 8, 2005 and
2 the related documents later the evening of the same day. Hearing on this and other "Evidence
3 Code section 402" motions will not be calendared for until a jury has been empanelled in this
4 matter. The Court will therefore be able to consider all of the submissions relating to a given
5 motion well before the hearing on a given motion.

6 In the circumstances, and with Plaintiff's assurance that every effort to serve and
7 file all responsive pleadings within the time limits set by the Court, leave to file this Reply
8 somewhat tardily is earnestly requested.

9 DATED: February 8, 2005

10
11 THOMAS W. SNEDDON, JR.
District Attorney

12 By: 
13 Gerald McC. Franklin, Senior Deputy

14 Attorneys for Plaintiff
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 PROOF OF SERVICE

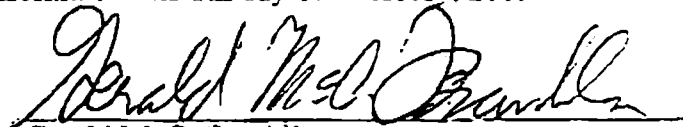
2 STATE OF CALIFORNIA }
3 COUNTY OF SANTA BARBARA } SS

4
5 I am a citizen of the United States and a resident of the County aforesaid; I am over
6 the age of eighteen years and I am not a party to the within-entitled action. My business
7 address is: District Attorney's Office; Courthouse; 1112 Santa Barbara Street, Santa Barbara.
8 California 93101.

9 On February 8, 2005, I served the within PLAINTIFF'S REQUEST FOR LEAVE
10 TO TARDILY FILE PLAINTIFF'S REPLY TO MOTION TO LIMIT INTRODUCTION OF
11 EVIDENCE INVOLVING THE DOE FAMILY, ETC. on Media Counsel and on Defendant
12 by THOMAS A. MESEREAU, JR., ROBERT SANGER and BRIAN OXMAN, by
13 transmitting a true copy thereof on defendant's counsel by fax at the confidential fax number in
14 Santa Maria and to Media's counsel at the facsimile number shown with the address for
15 counsel on the attached Service List. .

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

17 Executed at Santa Barbara, California on this 8th day of February, 2005.

18 
19 _____
20 Gerald McC. Franklin

SERVICE LIST

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

GIBSON, DUNN & CRUTCHER, LLP
Theodore J. Boutrous, Jr., Esq.
William E. Thomson, Esq.
Julian Poon, Esq.
333 S. Grand Avenue
Los Angeles, CA 90071-3197
FAX: (213) 229-6758
Attorneys for (collectively) "Media"

THOMAS A. MESEREAU, JR.
Collins, Mesereau, Reddock & Yu, LLP
1875 Century Park East, No. 700
Los Angeles, CA 90067
FAX: [SANTA MARIA - CONFIDENTIAL]
Attorney for Defendant Michael Jackson

ROBERT SANGER, ESQ.
Sanger & Swysen, Lawyers
233 E. Carrillo Street, Suite C
Santa Barbara, CA 93001
FAX: (805) 963-7311
Co-counsel for Defendant

BRIAN OXMAN, ESQ.
Oxman & Jaroscak, Lawyers
14126 E. Rosecrans Blvd.,
Santa Fe Springs, CA 90670
Co-counsel for Defendant