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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA
14 FOR THE COUNTY OF SANTA BARBARA, COOK DIVISION
15

16 THE PEOPLE OF THE STATE OF
17 CALIFORNIA,

18 Plaintiffs,

19 vs.

20 MICHAEL JOSEPH JACKSON,

21 Defendant.
22
23

) Case No. 1133603

) STIPULATION FOR INSPECTION AND
) COPYING OF SUBPOENAED RECORDS FOR
) ROTHMAN & FELDMAN AND C. MICHAEL
) ALDER, AND ORDER THEREON

) Honorable Rodney S. Melville

) Date: None Set
) Time: None Set
) Dept: SM-2

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26 Plaintiff, the People of the State of California, by and through their attorney of record, Santa
27 Barbara Deputy District Attorney Ronald Zonan, and defendant, Mr. Michael Jackson, by and through his
28 attorney of record, Brian Oxman, agree and stipulate as follows:

STIPULATION FOR INSPECTION AND COPYING OF SUBPOENAED RECORDS AND ORDER

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

APR 11 2005

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

1 (1) Pursuant to the Court's ruling of December 22, 2004, where the Court has permitted the
2 inspection and copying of all records in the case of Arvizo v. J.C. Penny, Inc., Los Angeles County
3 Superior Court Case No. Kc 027876, under Mr. Jackson's Subpoena Duces Tecum for such records issued
4 to Rothstein and Feldman, and C. Michael Alder, (hereafter "Subpoenaed Parties"), dated October 25,
5 2004, with the return date of November 10, 2004. both Mr. Jackson and the District Attorney may inspect
6 and copy such records at the offices of the Subpoenaed Parties;

7 (2) Both Mr. Jackson and the District Attorney may independently make such arrangements with
8 the Subpoenaed Parties to forthwith physically go to the location of the records, copy such records at their
9 expense on the premises, and retain such copies of the records.

10 (3) Both Mr. Jackson and the District Attorney shall have the obligation to disclose and turn over
11 copies of such records to the other side pursuant to mutual discovery obligations and Penal Code section
12 1054 at such time as they may physically obtain such records.

13 (4) The Subpoenaed Parties shall be obligated to issue and sign a Custodian of Records Declaration
14 and certification sufficient under California law regarding such records as either party may wish to have
15 copied, and such Custodian Declaration and certification of records shall be delivered to the Clerk of the
16 Court. along with a copy of the records as either side may request of the Subpoenaed Parties.

17 (5) Plaintiff has represented to defendant that Sr. Deputy District Attorney Gerald Franklin spoke
18 on the telephone with Tony Sadri (SBN 185418), an associate of Attorney Rothstein, on March 25, 2005,
19 and was informed by Attorney Sadri that the photographs in the possession of Feldman and Rothstein are
20 about sixteen pages of color-printer copies of photographs (four to a page) of Janet Arvizo and Gavin
21 Arvizo, and that the present custodian of the originals of the photographs are unknown to Mr. Sadri.

22 (6) Plaintiff and defendant agree that if the original color-printer copies presently in the possession
23 of Feldman and Rothstein, accompanied by a declaration of their custodian concerning their provenance,
24 are dispatched by Feldman and Rothstein care of a courier service such as Federal Express and delivered to
25 the Santa Barbara Sheriff's Department, to the attention Craig Bonner, those documents will be
26 photographed and a copy of the resulting photographs will be furnished to defense counsel.

27 (7) It is further agreed if the documents received by the Santa Barbara Sheriff's Department from
28 Feldman and Rothstein are admitted in evidence or lodged with the court in the course of the trial of the

1 above-captioned matter , the photographic copies of those documents may be substituted for the color-
2 printer "originals" at the conclusion of the proceedings and the "originals" will be returned to Feldman and
3 Rothstein.

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5 DATED: April 11 2005

THOMAS W. SNEDDON, JR.
DISTRICT ATTORNEY, SANTA BARBARA

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8 By: RJ Zong

9 Ronald Zong, Senior Deputy.

10 DATED: April 8 2005

11 COLLINS, MESEREAU, REDDOCK & YU
12 SANGER & SWYSEN
OXMAN & JACKSON

13 By: R. Brian Oxman

14 R. Brian Oxman
15 Attorney for Mr. Michael Jackson
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STIPULATION FOR INSPECTION AND COPYING OF SUBPOENAED RECORDS AND ORDER

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ORDER OF THE COURT

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The Court having read and considered the above Stipulation, and having approved its terms,
IT IS HEREBY SO ORDERED.

DATED: April 11, 2005



Judge Rodney Melville
Superior Court of California
County of Santa Barbara

STIPULATION FOR INSPECTION AND COPYING OF SUBPOENAED RECORDS AND ORDER