

OCT 25 2004

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*Unsealed
pursuant to
6116605 Court
order*

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 IN AND FOR THE COUNTY OF SANTA BARBARA
12 COOK DIVISION

14 THE PEOPLE OF THE STATE OF CALIFORNIA,
15 Plaintiff,
16 vs.
17 MICHAEL JACKSON,
18 Defendant.

Case No.: 1133603

APPLICATION TO FILE UNDER SEAL AND
WITHOUT NOTICE TO THE PEOPLE;
OBJECTIONS TO SUBPOENA DUCES TECUM;
PROPOSED ORDER

~~SEALED~~ *Dr. Carrera*

Dated: November 4, 2004
Time: 8:30 a.m.
Dept.: SM-2
Judge: Honorable Rodney Melville

25 Raymond Chandler, a third-party to this proceeding, hereby submits this application for an order
26 allowing him to file under seal Objections to Subpoena Duces Tecum served on him by the Defendant
27 Michael Jackson, and allowing him to file that Application without notice to the People.

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1 On or about September 19, 2004 Raymond Chandler was served, in his capacity as a custodian of
2 records, with a Subpoena Duces Tecum and related documents. The response to the Subpoena is due on
3 October 25, 2004 at 9:00 a.m., in Dept. SM-2.

4 On July 9, 2004 the Superior Court, the Hon. Judge Rodney Melville presiding, issued a
5 Protective Order Regarding Defendant's Subpoenas Duces Tecum, a copy of which was attached to the
6 subpoena identified herein as Exhibit 1. That Protective Order states, in part:

7 "3. Persons or entities subpoenaed by the Defendant shall not disclose directly or indirectly to
8 the People the fact that they have been subpoenaed or the nature of the subpoena.

9 4. Any appearance, objection, compliance, or other communication by a party subpoenaed by
10 the defendant shall be filed under seal."

11 Attached to this Application is a proposed Order.

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13 Date: 10/15, 2004

LAW OFFICE OF HERB FOX

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16 Herb Fox, Attorney for
17 Raymond Chandler