

1 Thomas A. Mesereau, Jr. (SBN 91182)
Susan C. Yu (SBN 195640)
2 COLLINS, MESEREAU, REDDOCK & YU, LLP
1875 Century Park East, 7TH Floor
3 Los Angeles, California 90067
Tel: (310) 284-3120
4 Fax: (310) 284-3133

5 Robert M. Sanger (SBN 58214)
SANGER & SWYSEN
6 233 E. Carrillo St., Suite C
Santa Barbara, CA 93101
7 Tel: (805) 962-4887
Fax: (805) 963-7311

8 Brian Oxman (SBN 072172)
9 OXMAN & JAROSCAK
14126 East Rosecrans
10 Santa Fe Springs, California 90670
Tel: (562) 921-5058
11 Fax: (562) 921-2298

12 Attorneys for Defendant
MICHAEL JOE JACKSON

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

16 THE PEOPLE OF THE STATE OF
17 CALIFORNIA,
18 Plaintiff,
19 vs.
20 MICHAEL JOE JACKSON
21 Defendant.

CASE NO. 1133603
} EX PARTE APPLICATION TO FILE UNDER
} SEAL RESPONSE TO PROSECUTION'S
} "SUPPLEMENT TO PEOPLE'S REPLY TO
} DEFENDANT'S MOTION TO COMPEL
} DISCOVERY"; [~~PROPOSE~~] ORDER
} HEARING:
} DATE: NOVEMBER 5, 2004
} TIME: 8:30 A.M.
} Place: Dept. SM-2
} FILED UNDER SEAL & BY FAX

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA

NOV 02 2004

GARY M. BLANK, Executive Officer
C. Carrie L. Wigner
CARRIE L. WIGNER, Deputy Clerk

1 Michael J. Jackson ("Mr. Jackson"), through his counsel, hereby applies *ex parte* for
2 leave to file under seal his Response to Prosecution's "Supplement to People's Reply to
3 Defendant's Motion to Compel Discovery" ("Response to Prosecution's Supplement").
4 Filing under seal is necessary because the content of the Response to Prosecution's
5 Supplement includes references to matters that are subject to this Court's Protective
6 Order.

7 This application is based upon the attached declaration of Susan C. Yu, the files
8 and record in this case and any other information presented prior to a ruling hereon.


9 Dated: November 2, 2004

Respectfully submitted,

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

13 SANGER & SWYSEN
14 Robert M. Sanger

15 OXMAN & JAROSCAK
16 Brian Oxman

17 By: 
18 Susan C. Yu
19 Attorneys for MICHAEL JOE JACKSON
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1 DECLARATION OF SUSAN C. YU

2 I, Susan C. Yu declare:

3 1. I am an attorney at law duly licensed to practice law in the courts of the
4 State of California, a partner in the law firm of Collins, Mesereau, Reddock & Yu, and co-
5 counsel for Mr. Michael Jackson in this criminal proceeding. I submit this declaration in
6 support of an *ex parte* application for leave to file under seal Mr. Jackson's Response to
7 Prosecution's Supplement.

8 2. The Response to Prosecution's Supplement describes materials that are
9 subject to this Court's Protective Order. Therefore, in accordance with the directives by
10 this Court, leave is sought to file this document under seal.

11 I declare under penalty of perjury that the foregoing is true and correct and that this
12 declaration was executed this 2nd day of November, 2004 at Los Angeles, California.

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14 
15 Susan C. Yu