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18 Attorneys for Defendant
19 **MICHAEL JOSEPH JACKSON**

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

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiffs,

vs.

MICHAEL JOSEPH JACKSON,

Defendant.

) Case No. 1133603

) EX PARTE APPLICATION FOR AN
) ORDER THAT MOTION TO SEAL
) MOTION TO DISMISS FOR
) OUTRAGEOUS GOVERNMENT
) CONDUCT AND TO SUPPRESS ALL
) EVIDENCE SEIZED PURSUANT TO SW
) 5192 AND 5196 BE FILED UNDER SEAL.

) Honorable Rodney S. Melville

) Date: December 23, 2004

) Time: 8:30 a.m.

) Dept: SM 8

TO THE CLERK OF THE ABOVE ENTITLED COURT:

Defendant requests that the Court issue an order that Mr. Jackson's pleading entitled

EX PARTE APPLICATION FOR AN ORDER THAT
MOTION TO SEAL MOTION TO DISMISS FOR OUTRAGEOUS GOVERNMENT CONDUCT AND TO SUPPRESS ALL
EVIDENCE SEIZED PURSUANT TO SW 5192 AND 5196 BE FILED UNDER SEAL

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA BARBARA
DEC 13 2004
Rodney S. Melville, Executive Officer
Clerk

1 an MOTION TO DISMISS FOR OUTRAGEOUS GOVERNMENT CONDUCT AND TO
2 SUPPRESS ALL EVIDENCE SEIZED PURSUANT TO SW 5192 AND 5196 and accompanying
3 documents be filed under seal and for such other such further relief as the Court may deem just and
4 proper. This request is based on the overriding interests of Mr. Jackson's rights to due process and
5 a fair trial under the Fifth, Sixth and Fourteenth Amendments to the United States Constitution and
6 Article I, Sections 1, 7, and 15 of the California Constitution.

7 Dated: December 10, 2004

8 Respectfully submitted,

9 COLLINS, MESEREAU, REDDOCK & YU
10 Thomas A. Mescreau, Jr.
Susan C. Yu

11 SANGER & SWYSEN
12 Robert M. Sanger

13 OXMAN & JAROSCAK
14 Brian Oxman

15 By: 

16 Robert M. Sanger
17 Attorneys for Defendant
18 MICHAEL JOSEPH JACKSON
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28 EX PARTE APPLICATION FOR AN ORDER THAT
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1 due process and a fair trial under the Fifth, Sixth and Fourteenth Amendments to the United
2 States Constitution and Article I, Sections 1, 7, and 15 of the California Constitution. Material
3 contained the exhibits pertains to evidence and the testimony of witnesses that, if made public,
4 would compromise Mr. Jackson's these rights and would result in prejudice to Mr. Jackson. In
5 order to protect these overriding interests, it is necessary that the exhibits be filed under seal.

6 CONCLUSION

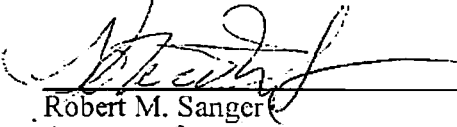
7 For the reasons stated above, Mr. Jackson requests that the Court issue an order that
8 MOTION TO DISMISS FOR OUTRAGEOUS GOVERNMENT CONDUCT AND TO
9 SUPPRESS ALL EVIDENCE SEIZED PURSUANT TO SW 5192 AND 5196 and
10 accompanying documents be filed under seal.

11 Dated: December 10, 2004

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