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8 Attorneys for Defendant  
 9 CONRAD R. MURRAY

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D.A. OFFICE  
 BY *[Signature]*

**FILED**  
 Los Angeles Superior Court

SEP 20 2010

John A. Clarke, Executive Officer/Clerk  
 By *[Signature]*, Deputy

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 11 FOR THE COUNTY OF LOS ANGELES

13 THE PEOPLE OF THE STATE OF  
 14 CALIFORNIA,

15 Plaintiff,

16 vs.

17 CONRAD R. MURRAY,

18 Defendant.

Case No. SA073164

NOTICE OF MOTION AND MOTION IN  
 LIMINE TO ADMIT MICHAEL JACKSON'S  
 PRESS CONFERENCE AT O2 ARENA

(Cal. Evid. Code § 402)

22 TO: STEVE COOLEY, DISTRICT ATTORNEY OF LOS ANGELES COUNTY; and his  
 23 deputies David B. Walgren and Deborah S. Brazil; AND

24 TO: CLERK OF THE ABOVE-ENTITLED COURT:

25 PLEASE TAKE NOTICE that Defendant Conrad R. Murray, by and through counsel,  
 26 hereby moves this Court for an order admitting into evidence Michael Jackson's press  
 27 conference/tour announcement held at the O2 Arena in London on March 5, 2009 pursuant  
 28 to Evidence Code Section 402.


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1 The motion is based on this notice of motion, the memorandum of points and  
2 authorities served and filed herewith, the pleadings and records on file herein, and upon  
3 such other and further argument as may be presented to the Court at the hearing of this  
4 matter.

5  
6 Dated: September 18, 2011

Respectfully submitted,

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9 By:   
10 Nareg Gourjian, Esq.  
11 Edward Chernoff, Esq.  
12 Attorneys for Defendant  
13 Conrad R. Munjaj

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MEMORANDUM OF POINTS AND AUTHORITIES

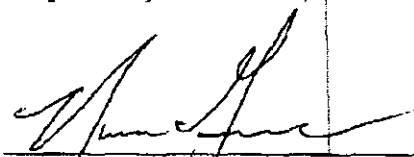
On March 5, 2009, Michael Jackson officially announced his "This Is It" concert tour at a press conference held at the O2 Arena in London. The concert tour at that time consisted of only 10 shows to be performed by Mr. Jackson in London. At the press conference Mr. Jackson informs the crowd that these 10 shows will be his "final show performances" and that this was the "final curtain call." Mr. Jackson reiterates to the crowd that "When I say this is it, It really means this is it." (A true and correct copy of the press conference recording is attached hereto as Exhibit A.)

This evidence is material and relevant and should be admitted at trial. (Cal. Evid. Code §§ 210, 350.) The video recording of the press conference allows jurors to see Mr. Jackson's mental and physical condition back in March, 2009. It also illustrates how adamant Mr. Jackson felt about performing *only* 10 concert shows. More importantly, the evidence corroborates Ms. Karen Faye's anticipated testimony that Mr. Jackson was furious when he learned that he had to perform 50 shows and felt that he would not be able to physically complete them all. Mr. Jackson told Ms. Faye, "It wasn't supposed to be this way. This is not what it was supposed to be. Why can't I choose?"

For the foregoing reasons, Dr. Murray respectfully requests that the audio/visual recording of Michael Jackson's press conference at the O2 Arena in London be admitted into evidence.

Dated: September 18, 2011

Respectfully submitted,

By:   
Nareg Gourjian, Esq.  
Edward Chernoff, Esq.  
Attorneys for Defendant  
Conrad R. Murray

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**PROOF OF SERVICE BY FACSIMILE**

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 101 N. Brand Blvd., Suite 1220, Glendale, CA 91203.

On September 19, 2011, I served on interested parties in said action the within:

NOTICE OF MOTION AND MOTION IN LIMINE TO ADMIT MICHAEL JACKSON'S PRESS CONFERENCE AT O2 ARENA

by serving a true copy thereof by facsimile to:

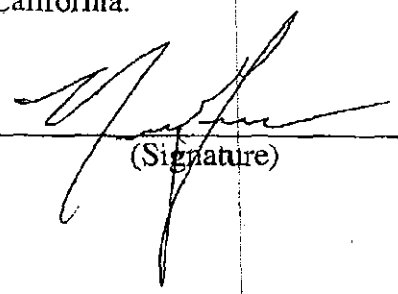
**David Walgren, D.D.A.**  
**Office of the District Attorney**  
**210 W. Temple St., 17<sup>th</sup> Floor**  
**Los Angeles, CA 90012**

I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 19, 2011, at Glendale, California.

Nareg Gourjian  
(Type or print name)



(Signature)