

FOR COURT USE ONLY

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address):

TELEPHONE AND FAX NOS.: (310) 858-7700

Burt Levitch (SBN 092803)  
Rosenfeld, Meyer & Susman, LLP  
9601 Wilshire Boulevard, Suite 710  
Beverly Hills, California 90210  
[Additional counsel listed on Attachment 1]

ATTORNEY FOR (Name): Katherine Esther Jackson

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
STREET ADDRESS: 111 NORTH HILL STREET  
MAILING ADDRESS: 111 NORTH HILL STREET  
CITY AND ZIP CODE: LOS ANGELES, CALIFORNIA 90012  
BRANCH NAME: CENTRAL DISTRICT

**FILED**  
LOS ANGELES SUPERIOR COURT

JUN 29 2009  
JOHN A. CLARKE, CLERK  
BY C.L. GINES, DEPUTY

ESTATE OF (Name): Estate of Michael Joseph Jackson aka Michael Jackson  
DECEDENT

ORDER FOR PROBATE  
ORDER  Executor  
APPOINTING  Administrator with Will Annexed  
 Administrator  Special Administrator  
 Order Authorizing Independent Administration of Estate  
 with full authority  with limited authority

CASE NUMBER:  
BP117321

**WARNING: THIS APPOINTMENT IS NOT EFFECTIVE UNTIL LETTERS HAVE ISSUED.**

1. Date of hearing: 6/29/2009 Time: 8:30 a.m. Dept./Room: 258 Judge:

THE COURT FINDS

- 2. a. All notices required by law have been given.
b. Decedent died on (date): June 25, 2009
(1)  a resident of the California county named above.
(2)  a nonresident of California and left an estate in the county named above.
c. Decedent died
(1)  intestate
(2)  testate
and decedent's will dated:
was admitted to probate by Minute Order on (date):

and each codicil dated:

THE COURT ORDERS

3. (Name): Katherine Esther Jackson is appointed personal representative:

- a.  executor of the decedent's will
b.  administrator with will annexed
c.  administrator
d.  special administrator
(1)  with general powers
(2)  with special powers as specified in Attachment 3d(2)
(3)  without notice of hearing
(4)  letters will expire on (date): 7/6/09

and letters shall issue on qualification.

- 4. a.  Full Authority is granted to administer the estate under the Independent Administration of Estates Act.
b.  Limited authority is granted to administer the estate under the Independent Administration of Estates Act (there is no authority, without court supervision, to (1) sell or exchange real property or (2) grant an option to purchase real property or (3) borrow money with the loan secured by an encumbrance upon real property).
5. a.  Bond is not required.
b.  Bond is fixed at: \$ 500,000 to be furnished by an authorized surety company or as otherwise provided by law.
c.  Deposits of: \$ are ordered to be placed in a blocked account at (specify institution and location):
and receipts shall be filed. No withdrawals shall be made without a court order.  Additional orders in Attachment 5c.
d.  The personal representative is not authorized to take possession of money or any other property without a specific court order.

6. (Name): is appointed probate referee. except as set forth in attachment 3d(2)

Date: June 29, 2009

JUDGE OF THE SUPERIOR COURT

7. Number of pages attached: 2

SIGNATURE FOLLOWS LAST ATTACHMENT

ORDER FOR PROBATE

Legal Solutions & Plus

Probate Code, §§ 8006, 8400

Estate of Michael Joseph Jackson aka Michael Jackson, Decedent

Order Appointing Special Administrator

Attachment 1

Additional counsel are as follows:

L. Londell McMillan (*pro hac vice* application pending)

Dewey & LeBoeuf LLP

1301 Avenue of the Americas

New York, New York 10019

(212) 259-8000

Dean Hansell (SBN 93831)

John E. Schreiber (SBN 261558)

Dewey & LeBoeuf LLP

333 South Grand Avenue

Suite 2600

Los Angeles, California 90071

(310) 621-6000

6/27/99

Estate of Michael Joseph Jackson aka Michael Jackson, Decedent

Order Appointing Special Administrator

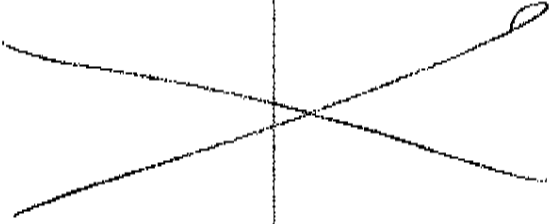
Attachment 3d(2)

Special power granted to Special Administrator:

~~In addition to the powers that are automatically conferred upon a Special Administrator pursuant to Probate Code Section 8544(a), the power is granted under Probate Code Section 8544(b)(2) to pay interest and principal obligations on secured debt to forestall immediate enforcement and to pay interest as it comes due.~~

To Control tangible personal property currently in the physical possession of a thirdparty, and to marshal and secure such assets.  
All other requests are to be set over to July 6, 2009 at 8:30 am  
in Dept. 5. DU

Dated: 4/29/09

  
Mitchell Beckloff

Judge of the  
Superior Court

**MITCHELL L. BECKLOFF**

Burt Levitch 92803  
Rosenfeld, Meyer & Susman, LLP  
9001 Wilshire Blvd Ste 710  
Beverly Hills, CA 90210

Counsel for Petitioners

**FILED**  
LOS ANGELES SUPERIOR COURT

JUN 29 2009

JOHN A. CLARKE, CLERK  
*Estela Vasquez*  
BY ESTELA VASQUEZ, DEPUTY

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

In The Matter Of the estate of  
Michael Joseph Jackson  
aka Michael Jackson,  
decedent

) Case No.: BP117321  
)  
)  
) June 29, 2009  
) Dept 5  
)  
) Supplement to Attachment  
) 3f(3) of Petition for  
) Letters of Special  
) Administration

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6/29/09

Petition for Letters of Special Administration

Supplement to Attachment 3f(3)

Additional grounds for appointment of Special Administrator:

Several compelling reasons exist for the immediate appointment of a Special Administrator in this matter:

1. Numerous bank accounts exist that are in control of third parties, some of which accounts were used to pay expenses of the decedent's parents' home. As the ability to continue to maintain such home now is more important than ever for the benefit of the decedent's children (as well as for the decedent's parents), it is crucial that a Special Administrator be appointed immediately to marshal these bank accounts.
2. The decedent was a joint venture stakeholder in the Sony-ATV Music Publishing Catalog, an extensive music catalog of tremendous value including works of the Beatles and other prominent songwriters. Communications are open with the principals involved, yet no one is appointed to speak on behalf of the decedent's very substantial interest in this most important asset of the estate. The remaining principal may immediately seek to assert rights and remedies under the terms of the joint venture agreement that would cause irreparable harm or irreversible loss. A Special Administrator is needed to be named immediately and placed in position to address such issues.
3. Control needs to be asserted by a Special Administrator over tangible personal property currently in the physical possession of a third party. Representatives of the decedent previously had sought to have certain memorabilia of the decedent sold at auction. The auction was canceled by the decedent, but a former representative of the decedent still has possession of these items even though there is no authority for retention of the items. Without a Special Administrator to secure the property, the chances of such valuable property disappearing or being wrongfully exploited are high.
4. Various business documents and other purported documents of the decedent are under the control of third parties, and their release could work to the detriment of the estate. A Special Administrator needs to quickly marshal and preserve such paperwork along with the other assets of the estate, thereby


facilitating an orderly administration of the estate both now and after a permanent Administrator is appointed.

5. We understand that at least one individual is suggesting that he has authority to act on behalf of the decedent because he is in possession of a power of attorney granted to him by decedent. While, of course, any such power of attorney would have expired with the decedent, no one presently is in a legal position to refute such contentions regarding a power of attorney or any other claim to representation of the decedent's interests. One of the concerns is that anyone presented with a power of attorney might not know that it had expired upon the decedent's death.

6. One or more individuals have claimed in the press that they have or may have a will of the decedent, yet no such documentation has been presented to the family although the family has requested a copy of any such paperwork. Likewise, no such document has been offered up to the press or lodged with this court. It is possible that the court will have to review many wills and evaluate the competing claims of the presenters of such wills. While the result of such review might be that someone other than Petitioner Katherine Esther Jackson would be appointed as the permanent personal representative of the decedent's estate, it is clear that someone with legal authority needs to be in place now to properly protect the estate's interests, especially in view of the possibly protracted process of examining the competing wills and claims thereon.

Furthermore, in this regard, co-counsel L. Londell McMillan is in constant, in person contact with the decedent's family including both Petitioners, and the family confirms that (a) no will or other estate planning document has surfaced to their knowledge and (b) they very much want Mr. McMillan to represent and protect the decedent's interests to the greatest possible extent. A possible competing interest is a purported claim of an attorney who long ago was dismissed from the decedent's group of advisors and about whom the decedent stated that he never wanted the attorney to have anything further to do with his affairs.

For the foregoing reasons, the appointment of a Special Administrator now, rather than a week from now, is strongly indicated.



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Burt Levitch, Counsel for Petitioners

FOR COURT USE ONLY

ATTORNEY, OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Burt Levitch (SBN 92803)  
Rosenfeld, Meyer & Susman, LLP  
9601 Wilshire Boulevard, Suite 710  
Beverly Hills, California 90210  
[Additional counsel listed on Attachment 1]

TELEPHONE NO.: (310) 858-7700 FAX NO. (Optional):

E-MAIL ADDRESS (Optional): Joseph Walter Jackson and

ATTORNEY FOR (Name): Katherine Esther Jackson

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS: 111 North Hill Street

CITY AND ZIP CODE: Los Angeles 90012

BRANCH NAME: Central

ESTATE OF (Name): Michael Joseph Jackson aka Michael Jackson

DECEDENT

- PETITION FOR
- Probate of Will and for Letters Testamentary
  - Probate of Will and for Letters of Administration with Will Annexed
  - Letters of Administration
  - Letters of Special Administration  with general powers
  - Authorization to Administer Under the Independent Administration of Estates Act  with limited authority

CASE NUMBER: BP117321

HEARING DATE:

DEPT.: 5

TIME:

FILED  
Los Angeles Superior Court

JUN 29 2009

John A. Flaherty, Executive Officer  
BY: A. Watts  
A. Watts

*Handwritten:* W. B. Burt

*Handwritten:* OK TO SET - 7-6-09 8:30 AM D-5

1. Publication will be in (specify name of newspaper): Metropolitan News Company

- a.  Publication requested.
- b.  Publication to be arranged.

Petitioner (name each): Joseph Walter Jackson and Katherine Esther Jackson

requests that

a.  decedent's will and codicils, if any, be admitted to probate.

b.  (name): Katherine Esther Jackson

be appointed

- (1)  executor
- (2)  administrator with will annexed
- (3)  administrator
- (4)  special administrator  with general powers and Letters issue upon qualification.

c.  full  limited authority be granted to administer under the Independent Administration of Estates Act.

d. (1)  bond not be required for the reasons stated in item 3d.

(2)  \$ bond be fixed. The bond will be furnished by an admitted surety insurer or as otherwise provided by law. (Specify reasons in Attachment 2 if the amount is different from the maximum required by Prob. Code, § 8482.)

(3)  \$ in deposits in a blocked account be allowed. Receipts will be filed. (Specify institution and location):

**DATE OF HEARING**

7/6/09 D-5 8:30 a.m.

3. a. Decedent died on (date): June 25, 2009

- (1)  a resident of the county named above.
- (2)  a nonresident of California and left an estate in the county named above located at (specify location permitting publication in the newspaper named in item 1):

at (place): Los Angeles, California

b. Street address, city, and county of decedent's residence at time of death (specify):

100 North Carolwood Drive, Los Angeles, Los Angeles County, California 90077

ESTATE OF (Name): Michael Joseph Jackson aka Michael Jackson	CASE NUMBER: <b>BP 117321</b>
<b>DECEDENT</b>	

3. c. Character and estimated value of the property of the estate (complete in all cases):

- (1) Personal property: \$ To be determined
- (2) Annual gross income from
  - (a) real property: \$ To be determined
  - (b) personal property: \$ To be determined
- (3) Subtotal (add (1) and (2)): \$ To be determined
- (4) Gross fair market value of real property: \$ To be determined
- (5) (Less) Encumbrances: \$ (To be determined)
- (6) Net value of real property: \$ To be determined
- (7) Total (add (3) and (6)): \$ To be determined

- d. (1)  Will waives bond.  Special administrator is the named executor, and the will waives bond.
- (2)  All beneficiaries are adults and have waived bond, and the will does not require a bond. (Affix waiver as Attachment 3d(2).)
- (3)  All heirs at law are adults and have waived bond. (Affix waiver as Attachment 3d(3).)
- (4)  Sole personal representative is a corporate fiduciary or an exempt government agency.

- e. (1)  Decedent died intestate.
- (2)  Copy of decedent's will dated:  codicil dated (specify for each):  
are affixed as Attachment 3e(2).
- (Include typed copies of handwritten documents and English translations of foreign-language documents.)
- The will and all codicils are self-proving (Prob. Code, § 8220).

f. Appointment of personal representative (check all applicable boxes):

- (1) Appointment of executor or administrator with will annexed:
- (a)  Proposed executor is named as executor in the will and consents to act.
  - (b)  No executor is named in the will.
  - (c)  Proposed personal representative is a nominee of a person entitled to Letters. (Affix nomination as Attachment 3f(1)(c).)
  - (d)  Other named executors will not act because of  death  declination  other reasons (specify):

Continued in Attachment 3f(1)(d).

- (2) Appointment of administrator:
- (a)  Petitioner is a person entitled to Letters. (If necessary, explain priority in Attachment 3f(2)(a).)
  - (b)  Petitioner is a nominee of a person entitled to Letters. (Affix nomination as Attachment 3f(2)(b).)
  - (c)  Petitioner is related to the decedent as (specify): Mother
- (3)  Appointment of special administrator requested. (Specify grounds and requested powers in Attachment 3f(3).)

g. Proposed personal representative is a

- (1)  resident of California.
- (2)  nonresident of California (specify permanent address):
- (3)  resident of the United States.
- (4)  nonresident of the United States.

ESTATE OF (Name): Michael Joseph Jackson aka Michael Jackson

CASE NUMBER:

DECEDENT

BP 117321

4.  Decedent's will does not preclude administration of this estate under the Independent Administration of Estates Act.
5. a. Decedent is survived by (check items (1) or (2), and (3) or (4), and (5) or (6), and (7) or (8))
- (1)  spouse.
- (2)  no spouse as follows:
- (a)  divorced or never married.
- (b)  spouse deceased.
- (3)  registered domestic partner.
- (4)  no registered domestic partner.  
(See Fam. Code, § 297.5(c); Prob. Code, §§ 37(b), 6401(c), and 6402.)
- (5)  child as follows:
- (a)  natural or adopted.
- (b)  natural adopted by a third party.
- (6)  no child.
- (7)  issue of a predeceased child.
- (8)  no issue of a predeceased child.
- b. Decedent  was  was not survived by a stepchild or foster child or children who would have been adopted by decedent but for a legal barrier. (See Prob. Code, § 6454.)
6. (Complete if decedent was survived by (1) a spouse or registered domestic partner but no issue (only a or b apply), or (2) no spouse, registered domestic partner, or issue. (Check the first box that applies):
- a.  Decedent was survived by a parent or parents who are listed in item 8.
- b.  Decedent was survived by issue of deceased parents, all of whom are listed in item 8.
- c.  Decedent was survived by a grandparent or grandparents who are listed in item 8.
- d.  Decedent was survived by issue of grandparents, all of whom are listed in item 8.
- e.  Decedent was survived by issue of a predeceased spouse, all of whom are listed in item 8.
- f.  Decedent was survived by next of kin, all of whom are listed in item 8.
- g.  Decedent was survived by parents of a predeceased spouse or issue of those parents, if both are predeceased, all of whom are listed in item 8.
- h.  Decedent was survived by no known next of kin.
7. (Complete only if no spouse or issue survived decedent.)
- a.  Decedent had no predeceased spouse.
- b.  Decedent had a predeceased spouse who
- (1)  died not more than 15 years before decedent and who owned an interest in real property that passed to decedent,
- (2)  died not more than five years before decedent and who owned personal property valued at \$10,000 or more that passed to decedent,  
(If you checked (1) or (2), check only the first box that applies):
- (a)  Decedent was survived by issue of a predeceased spouse, all of whom are listed in item 8.
- (b)  Decedent was survived by a parent or parents of the predeceased spouse who are listed in item 8.
- (c)  Decedent was survived by issue of a parent of the predeceased spouse, all of whom are listed in item 8.
- (d)  Decedent was survived by next of kin of the decedent, all of whom are listed in item 8.
- (e)  Decedent was survived by next of kin of the predeceased spouse, all of whom are listed in item 8.
- (3)  neither (1) nor (2) apply.
8. Listed on the next page are the names, relationships to decedent, ages, and addresses, so far as known to or reasonably ascertainable by petitioner, of (1) all persons mentioned in decedent's will or any codicil, whether living or deceased; (2) all persons named or checked in items 2, 5, 6, and 7; and (3) all beneficiaries of a trust named in decedent's will or any codicil in which the trustee and personal representative are the same person.

ESTATE OF (Name): Michael Joseph Jackson aka Michael Jackson	CASE NUMBER: BP 117321
DECEDENT	

<u>8. Name and relationship to decedent</u>	<u>Age</u>	<u>Address</u>
Joseph Walter Jackson, father	Adult	
Katherine Esther Jackson, mother	Adult	
Michael Prince Jackson, son	12	
Paris Katherine Michael Jackson, daughter	11	
Prince Michael Jackson II, son	7	

Continued on Attachment 8.

9. Number of pages attached: 4

Date: June 28, 2009

Burt Levitch  
(TYPE OR PRINT NAME OF ATTORNEY)

*Burt Levitch*  
(SIGNATURE OF ATTORNEY)

\*(Signatures of all petitioners are also required. All petitioners must sign, but the petition may be verified by any one of them (Prob. Code, §§ 1020, 1021; Cal. Rules of Court, rule 7.103).)

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

Date: June 28, 2009

Joseph Walter Jackson  
(TYPE OR PRINT NAME OF PETITIONER)

*Joseph Walter Jackson*  
(SIGNATURE OF PETITIONER)

Katherine Esther Jackson  
(TYPE OR PRINT NAME OF PETITIONER)

*Katherine E. Jackson*  
(SIGNATURE OF PETITIONER)

Signatures of additional petitioners follow last attachment.

06/28/09

Estate of Michael Joseph Jackson aka Michael Jackson, Decedent

Petition for Letters of Special Administration

Attachment 1

Additional counsel are as follows:

L. Londell McMillan (*pro hac vice* application pending)  
Dewey & LeBoeuf LLP  
1301 Avenue of the Americas  
New York, New York 10019  
(212) 259-8000

Dean Hansell (SBN 93831)  
John E. Schreiber (SBN 261558)  
Dewey & LeBoeuf LLP  
333 South Grand Avenue  
Suite 2600  
Los Angeles, California 90071  
(310) 621-6000

02/28/00

Estate of Michael Joseph Jackson aka Michael Jackson, Decedent

Petition for Letters of Special Administration

Attachment 3d.

Waiver of bond is requested as follows:

Petitioner seeking appointment as Special Administrator is the mother of the decedent. She intends to marshal assets of the decedent for the exclusive use of the decedent's three children - her grandchildren - after payment of debts and expenses of administration. The decedent's children are the sole beneficiaries of his estate under California Probate Code Section 6402(a). Public scrutiny of these proceedings makes it virtually impossible for the proposed Special Administrator to do anything inappropriate with estate assets or in any manner harm the estate's beneficiaries or creditors. Given the nature and extent of the decedent's assets, it would be difficult if not impossible to quantify their value at this time, so the calculation of bond would be speculative at best. For these reasons, waiver of bond is respectfully requested.

Estate of Michael Joseph Jackson aka Michael Jackson, Decedent

Petition for Letters of Special Administration

Attachment 3f(2)(a)

Proposed Special Administrator has priority as follows:

Petitioner Katherine Esther Jackson is the decedent's mother. Since the decedent had no surviving spouse or domestic partner, and his children are minors without a guardian appointed, his parents are first in order of priority of persons entitled to appointment under California Probate Code Section 8461(e). By signing this Petition, both of decedent's parents join in proposing that Katherine Esther Jackson be appointed as Special Administrator of the decedent's estate.

Estate of Michael Joseph Jackson aka Michael Jackson, Decedent

Petition for Letters of Special Administration

Attachment 3f(3)

Grounds and requested powers for Special Administrator:

Grounds:

Immediate appointment of a Special Administrator is necessary for the preservation of estate assets. Petitioners are concerned that a variety of people may come forward with what they inaccurately claim to be a will of the decedent. In addition, the decedent's financial life was in transition at the time of his death, and no one individual or entity has a complete overview of his various enterprises. Consolidation of management is needed so that business obligations and opportunities are properly addressed until the appointment of a permanent Administrator can be made.

A Special Administrator is needed to (a) take possession of all property of the estate and preserve it from damage, waste and injury, (b) collect and secure income from various substantial sources of such income, (c) defend against suits that may be filed against the estate, especially in view of the possibility of false competing wills, (d) commence legal proceedings to protect the interests of the estate; again, in view of the possible emergence of said competing false wills, (e) attend to pending contracts to which the decedent was a party, (f) continue to meet the decedent's payroll obligations, and (g) make payments due on secured debt.

Notice of the request for appointment of a Special Administrator is effectively given with the signing of this Petition by all the affected parties having legal capacity.

Requested Powers:

All of the grounds for appointment of a Special Administrator described above, except for the last, can be addressed with powers that are automatically conferred upon a Special Administrator pursuant to Probate Code Section 8544(a).

With respect to debt, it is requested that the Special Administrator be granted the power under California Probate Code Section 8544(b)(2) to pay interest and principal obligations on secured debt to forestall immediate enforcement and to pay interest as it comes due.