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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

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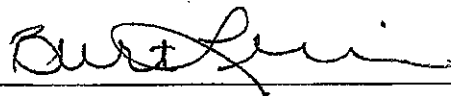
facilitating an orderly administration of the estate both now and after a permanent Administrator is appointed.

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.



Burt Levitch, Counsel for Petitioners

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