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Attorneys for Plaintiffs.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

KATHERINE JACKSON, individually and as
the Guardian ad Litem of MICHAEL JOSEPH
JACKSON, JR., PARIS-MICHAEL
KATHERINE JACKSON, and PRINCE
MICHAEL JACKSON II,

Plaintiffs,

v.

AEG LIVE LLC; ANSCHUTZ
ENTERTAINMENT GROUP, INC; AEG
LIVE PRODUCTIONS, LLC; BRANDON
PHILLIPS, an individual; PAUL
GONGAWARE, an individual; TIMOTHY
LEIWEKE, an individual and DOES 1 to 100,
inclusive,

Defendants.

Case No. BC445597
[Assigned for all purposes to Hon. Yvette M.
Palazuelos, Dept. 28]

DECLARATION OF [REDACTED]

I, [REDACTED], declare as follows:

1. I have personal knowledge of the facts set forth herein and if called as a witness, I could and would competently testify to the matters stated herein.

2. My experience as a juror in this case was the first time that I have ever served on a jury before and after such a long and important trial, I really wanted to perform my duty as a juror to the best of my ability.

DECLARATION OF [REDACTED]

EX.1

3. Since the jury verdict, I have been very upset, and initially I was unable to eat or even check my emails because I was so sorry about the verdict and the fact that justice was not done in this case. *because of how question 2 on the verdict form was worded.*

4. Although I was eager to begin deliberations and discuss the evidence, I did not ever get the chance to discuss any of the important issues that arose in the trial because of the jury verdict form. The verdict form limited our discussions to only the hiring issue, even though the most evidence presented at trial involved the issue of the conflict of interest created by AEG Live between Dr. Conrad Murray and Michael Jackson.

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12/13/2013

5. Question 2 on the verdict form asked: "V

incompetent to perform the work for which he was hired?
when coupled with the first question asking, "Did AEG L
our consideration to Dr. Murray's competency at the tim
allow us to discuss the issue of whether Dr. Murray beca

6. I was shocked to see that we had to stop o

if we voted "no" to the question of whether Dr. Murray v
work for which he was hired. I wanted and expected to d
supervision and negligent retention, which we had been r

7. I do not believe that the verdict form was
Question 2 was a trap that prevented us from deliberating
question in this trial was not whether Dr. Murray was un
hired - but whether AEG Live should have hired him at
unfit and incompetent because of the creation of a conflic

8. I do not understand why there were no tim
believe that the addition of the words "at any time" to Q
question was too specific and narrow, making it impossi

9. This was a very unfair and upsetting way
my mind that AEG Live was liable, but I had no way of f

2
DECLARATION OF [REDACTED]

2 on the verdict form. [REDACTED]

[REDACTED] will always feel badly

I declare under penalty of perjury under the laws o
foregoing is true and correct.

Executed December 11, 2013, at [REDACTED]

EXHIBIT 2

12/13/20

22 I, [REDACTED], declare as follows:

23 1. I have personal knowledge of the facts set forth herein and if called
24 could and would competently testify to the matters stated herein.

25 2. After sitting through almost six months of the trial in this case, I believe
26 Jackson had proven her case against AEG Live. Despite this fact, I had no way of
27 of the Plaintiffs because of the way that the verdict form was worded.
28

1 3. Question 2 of the verdict form asked: "Was Dr. Conrad Murray unfit
2 incompetent to perform the work for which he was hired?" When we reached this
3 [REDACTED] discussed with us the fact that the clear meaning of that question
4 coupled with the first question asking, "Did AEG Live hire Dr. Conrad Murray?",
5 choice but to consider Dr. Murray's competency **at the time he was hired**. We discussed
6 that the question did not allow us to vote or discuss the issue of whether Dr. Murray
7 or incompetent later in time. I believe that the evidence showed that Dr. Murray became
8 because of the conflict created after AEG Live tried to control Dr. Murray and make
9 Michael Jackson to practice.

10 4. I was shocked to see that we had to stop our deliberations at the end
11 if we voted "no" to the question of whether Dr. Murray was unfit or incompetent to
12 work for which he was hired. I wanted and expected to continue to talk about the
13 negligent supervision and negligent retention, which we had been instructed and to
14 separate theories. I do not think that whether or not Dr. Murray was competent to
15 practitioner for the tour at the time that he was hired had anything to do with the re
16 case.

17 5. Many jurors became very upset about the fact that we were not able
18 complete our deliberations – especially because we had spent a lot of time listening
19 evidence in this case. One juror, [REDACTED] refused to stop deliberating and he i
20

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EXHIBIT 3

10/2/2017

22 I, [REDACTED], declare as follows:

23 1. I have personal knowledge of the facts set forth herein and if called
24 could and would competently testify to the matters stated herein.

25 2. Being selected for and serving on the jury for this trial was one of
26 experiences of my life. For such an important case, I would have been willing to
27 and thoroughly until December. I took my role as a juror very seriously, and even
28 began deliberations, I asked for all the evidence to be brought into the jury room.

1 3. To my shock and huge disappointment, however, I never got the chance
2 the most important issues or review the most pertinent e-mails because of the confu-
3 form and the order in which the questions appeared on that form. To this day, I do
4 understand why we had to stop deliberating after answering Question 2, or why we
5 from discussing the ethical conflict or any of the real issues in this case.

6 4. Question 2 of the verdict form asked: "Was Dr. Conrad Murray un-
7 competent to perform the work for which he was hired?" When we reached this
8 [REDACTED] discussed with us the fact that the clear meaning of that question
9 coupled with the first question asking, "Did AEG Live hire Dr. Conrad Murray?",
10 choice but to consider Dr. Murray's competency at the time he was hired. I believe
11 question should have included the words "at any time", but it did not. I also thought
12 have been preferable to have this question at the end of the form. The real issues in
13 the negligent retention and negligent supervision of Dr. Murray by AEG Live – and
14 have been allowed to discuss those issues first.

15 5. During our deliberations, I asked to send a question to the judge to
16 Question 2, but by then the foreman had already answered "no" and followed the in-
17 sign the form. I feel so cheated because I sat through more than five months of trial
18 to a lot of evidence on the ethical conflict created – yet I never got to even deliber-
19 issue or even review the hundreds of exhibits that had been brought in. Most of the
20 discussed the fact that there also believed that [REDACTED] this [REDACTED] [REDACTED]

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EXHIBIT 4

E1G2/31/21

22 I, [REDACTED], declare as follows:

23 1. I have personal knowledge of the facts set forth herein and if called a
24 could and would competently testify to the matters stated herein.

25 2. I want to have this opportunity to share my thoughts and feelings with
26 Palazuelos about the jury instructions and verdict.

27 3. As jurors, we did everything that was asked of us, made sacrifices, and
28 through almost six months of a very important trial. The case, however, ended abruptly.

DECLARATION OF [REDACTED]

1 rendering a verdict for the defense. The verdict form caused us to stop deliberating

2 2. I believe that the verdict form was ambiguous; and that it did not provide a way
3 to move forward in our deliberations.

4 4. I believe that some of the jurors wanted to render a verdict for the Plaintiff.
5 Some of the jurors were stunned and upset after learning that we had to stop deliberating
6 answering "no" to Question 2. Question 2 of the verdict form asked: "Was Dr. Conrad Murray
7 unfit or incompetent to perform the work for which he was hired?" When we reached that
8 question, one of the jurors, [REDACTED], discussed with us the fact that the clear meaning of that
9 coupled with the first question asking, "Did AEG Live hire Dr. Conrad Murray?", gave us no
10 choice but to consider Dr. Murray's competency at the time he was hired.

11 5. I discussed with the jurors my belief that the strongest claims for the Plaintiff were
12 negligent supervision and negligent retention – but we were never allowed to deliberate on those
13 claims because of the verdict form. One of the jurors, [REDACTED], even refused to continue
14 deliberating and he wanted to continue answering the remainder of the questions. We were
15 writing a question to the judge about the question, but we did not want anyone to know we
16 were in the deliberations.

17 6. I would like the judge to know that we did not have the opportunity

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11/19/2013
[REDACTED]