

UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

EMERGENCY MOTION UNDER CIRCUIT RULE 27-3

JOHN G. BRANCA, Special
Administrator of the Estate of Michael
J. Jackson; JOHN MCCLAIN, Special
Administrator of the Estate of Michael
J. Jackson; TRIUMPH
INTERNATIONAL, INC.,

Plaintiffs/Appellees,

vs.

HEAL THE WORLD
FOUNDATION, California
corporation and UNITED FLEET, a
California corporation,

Defendants/Appellants.

Case Number(s):
11-56926, 11-57048 (Consolidated)

C.D. No. 2:09-cv-07084-DMG
Central District of California,
Los Angeles

**EMERGENCY MOTION
UNDER CIRCUIT RULE 27-3
TO STRIKE APPELLANTS'
EXCERPTS OF RECORD AND
OPENING BRIEF BECAUSE
THEY INCLUDE AND
REFERENCE SEALED
DOCUMENTS FILED IN THE
PUBLIC RECORD IN
VIOLATION OF NINTH
CIRCUIT RULES 27-13 AND
25-5**

Circuit Rule 27-3 Certificate

Pursuant to Circuit Rule 27-3(3):

- (i) Appellants' counsel's information is:

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Appellees' counsel's information is:

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- (ii) Appellants filed in the public record hundreds of pages of documents that were filed under seal pursuant to district court order because they are highly confidential and sensitive, being settlement documents that may be used by third parties in ongoing litigation. The sealed documents are included in the Excerpts of Record and referenced in the Opening Brief, and harm already is arising from their inclusion; still more harm will come if the Court does not immediately order them removed from the public record.

Specifically, the Opening Brief has already been published on the website teammichaeljackson.com, which is operated by one of Appellants' cohorts. Boyajian Decl., ¶¶ 11-12, Ex. E. The website indicates that it intends to publish the complete Excerpts of Record as well: "For the time being we are only publishing this one document, to give you an idea of what is to come. There are further 4 documents with excess of 1080 pages we will publish at a later date." *Id.*, Ex. 11. It is thus clear that should these documents remain in the public record, they will be published and widely distributed, in direct violation of the district court's orders. Such publication would cause irreparable harm to Appellees, as the Estate is involved in ongoing litigation with a number of third parties (*id.* at 13) who may use the confidential documents, including the Settlement Agreement, to gain some perceived tactical advantage. In order to avoid further irreparable harm, Appellees' certify that relief is needed in less than 21 days. *Id.*

- (iii) Both the Clerk of this Court (Emergency Motions division) and Appellants' counsel were notified of this Motion on February 25,

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2013. Appellants' counsel will be served with the Motion at the same time it is filed with the Court. *Id.*, Ex. 14.

Dated: February 26, 2013

GREENBERG TRAURIG, LLP

By: /S/ NINA D. BOYAJIAN
NINA D. BOYAJIAN

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Attorneys for Plaintiffs-Appellees John
G. Branca, Co-Executor of the Estate of
Michael J. Jackson; John McClain, Co-
Executor of the Estate of Michael J.
Jackson; Triumph International, Inc.

I. INTRODUCTION

After seeking four extensions of time to file an Opening Brief, based in part on purported difficulties in obtaining sealed documents, Appellants have now electronically filed in this Court's publically accessible Electronic Case Files their Opening Brief and their Excerpts of Record ("ER") that include copies of over a dozen documents that had been ***filed under seal by court order in the district court***, in plain violation of Ninth Circuit Rules 25-5(b)(9) and 27-13 and the Advisory Committee Notes thereto.

The sealed documents relate to the confidential settlement agreement between the parties ("Settlement Agreement"), Appellees' successful efforts to enforce the Settlement Agreement, the district court's orders enforcing the Settlement Agreement, and a confidential transcript of proceedings. The district court ordered that all documents referencing the Settlement Agreement, including Appellants' attempts at setting aside the judgment enforcing the Settlement Agreement, shall be filed under seal because of the confidentiality provision in the Settlement Agreement.

Nevertheless, Appellants' electronically-filed Opening Brief and ER include and make reference to these confidential, sealed documents, in violation of not only the district court's order, but also in contravention of the procedures set forth in Ninth Circuit Rules 25-5(b)(9) and 27-13. Appellants' knowledge of the confidential and sealed status of these documents is evidenced by their prior compliance with the district court's order by previously filing documents under seal and by their multiple requests for extensions based on a claimed difficulty in obtaining these documents as a result of their sealed status. Appellees therefore request that the ER as well as Appellants' Opening Brief, which references the sealed documents in the ER, be stricken from the electronic

record and that Appellants be ordered to electronically file their revised Opening Brief and revised ER without copies of, or quotations from the contents of, documents sealed by the district court below, and to file all documents under seal in the court below strictly pursuant to this Court's rules and procedures.

II. RELEVANT FACTUAL HISTORY¹

A. The District Court Enforced The Parties' Confidential Settlement Agreement And Ordered That Documents Relating To The Settlement Agreement Be Filed Under Seal.

On April 19, 2011, the first day of trial, the district court held an in-chambers conference wherein the parties advised the court of the settlement that had been reached in the litigation. Declaration of Nina D. Boyajian ("Boyajian Decl."), ¶ 2. The conference was held in chambers as a result of the confidentiality provision in the Settlement Agreement. *Id.* The parties' counsel also advised the court that they expected to submit a stipulated dismissal and permanent injunction and final judgment reflecting the terms of the Settlement Agreement. *Id.*

Notwithstanding these representations and the parties' execution of the binding Settlement Agreement, Appellants breached the Settlement Agreement and unsuccessfully argued, through their attorney at the time, that it should not be enforced. *Id.*, ¶ 3. After considering Appellants' numerous briefs and declarations in opposition to Appellees' Motion to Enforce the Settlement Agreement, allowing for oral argument on the motion, and providing Appellants an opportunity to participate in the drafting of an order enforcing the Settlement

¹ The complete factual history will be provided in Appellees' Responding Brief. The facts set forth herein are limited to those concerning the status of the documents Appellants' filed in the ER as confidential and sealed, and Appellants' knowledge of that status.

Agreement, the district court ultimately rejected Appellants' arguments and enforced the agreement by Order dated June 27, 2011, and by a Judgment and injunction of the same date. *Id.*, ¶ 4; *see also* ER at 821-827.

The court also ordered that as a result of the confidentiality provision in the Settlement Agreement, all motions or briefing relating to the agreement must be filed under seal. *Id.*, ¶ 5, Ex. A, District Ct. Dkt. No. 194; Ex. B. Indeed, the district court's June 27, 2011 Order and Judgment were both filed under seal. *Id.*

B. Pursuant To The District Court's Orders, Appellants' Unsuccessful Motions To Vacate The Judgment And Portions Of Their Notices Of Appeal Were Filed Under Seal.

After missing their deadline to file a notice of appeal, Appellants sought an extension of time, which was granted by the district court. *Id.*, ¶ 6. Shortly thereafter, on September 19, 2011, Appellants filed a Motion for Relief from Judgment, which largely regurgitated the arguments Appellants had made in opposition to Appellees' Motion to Enforce the Settlement Agreement. *Id.*, ¶ 7; *see* ER at 837-988. Because Appellants' Motion for Relief from Judgment and supporting papers included explicit references to the confidential Settlement Agreement, and the Settlement Agreement itself, Appellants filed those documents under seal. *See, e.g.*, ER at 843, 920. Appellants' motion was denied by the district court on the basis, *inter alia*, that there was no newly-discovered evidence warranting relief, and finding that the Settlement Agreement could not be more clear as to its legal effect. Boyajian Decl., ¶ 7. The Court's October 27, 2011 order was filed under seal. *Id.*

Further demonstrating their knowledge and understanding that documents referencing or incorporating the Settlement Agreement must be filed under seal

pursuant to the district court's order, Appellants filed the June 27, 2011 Order, the October 27, 2011 Amended Judgment, and the October 27, 2012 Order denying Appellants' Motion for Relief from Judgment under seal when they filed their Notices of Appeal. *Id.*, ¶ 8, Ex. C; ER at 1010-12.

C. Appellants Sought Numerous Extensions Of Time From This Court, Citing Difficulties In Obtaining Sealed Documents.

At least two of Appellants' requests for extensions of time to file their Opening Brief in this Court were based on their purported difficulty in obtaining sealed documents, and Appellants even sought and received an order from the district court permitting Appellants' counsel only – and no one else – to access the sealed documents. *Id.*, ¶ 9, Ex. D, District Ct. Dkt. No. 316.

In Appellants' November 11, 2012 request for an extension of time, Appellants offered the following excuse for their request to further extend the deadline to file the Opening Brief: "Undersigned counsel has commenced to accumulate the extensive record, including a determination of how many of the 35 or so sealed documents have been unsealed thus far and how many still remain so and require motions to unseal. That effort will require some time before a draft of the Opening Brief can be constructed." Dkt. 26 at 2-3. This statement was made in November 2012 despite the fact that the district court ordered on August 22, 2012 that Appellants' counsel "be allowed access to all sealed documents and filings." Boyajian Decl., ¶ 9, Ex. D, District Ct. Dkt. No. 316. This statement further demonstrates not only Appellants' knowledge that many documents filed in the district court action were sealed, but also that such sealed documents would "require motions to unseal." No such motions to unseal were made either in the district court or in this Court. *Id.*, ¶ 10.

On January 6, 2013 Appellants filed yet another request for an extension

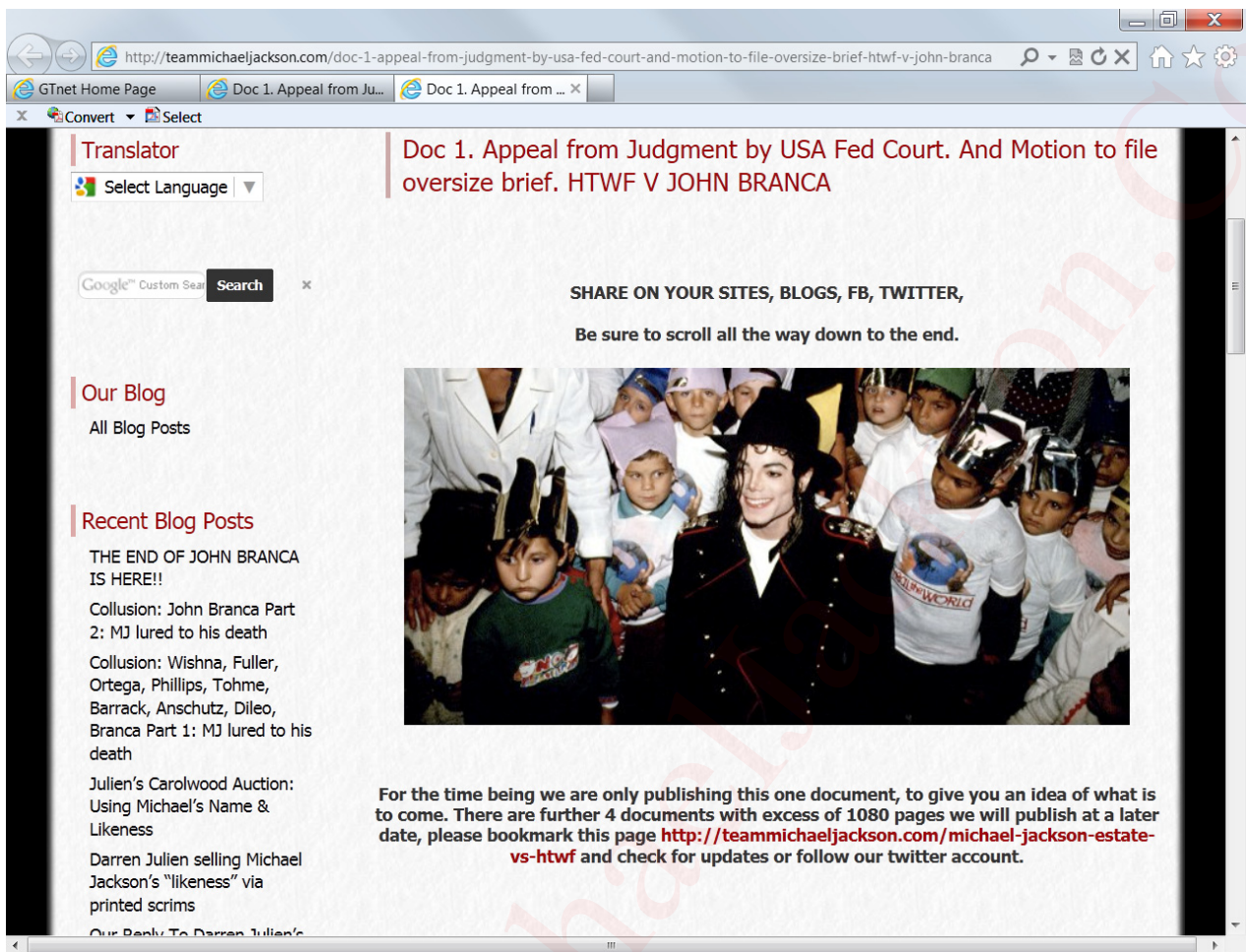
of time to file their Opening Brief, stating: “many documents, particularly sealed records, have not yet been acquired from former counsel, the president of an appealing party (who just had a baby), or the court files.” Dkt. 29 at 1:28-2:2. Thus, once again, as of January 2013, Appellants knew that the records they sought to incorporate in their Opening Brief were sealed, and yet took no action to maintain the confidential nature of those documents. Instead, Appellants recklessly filed hundreds of pages of court-ordered sealed documents in the public record.

D. Immediately Following Appellants’ Filing, Appellants’ Opening Brief Was Published On The Website Of One Of Appellants’ Cohorts.

On February 22, 2013, Appellants finally filed their Opening Brief. The brief makes reference to, and the ER includes, hundreds of pages of documents that were ordered sealed by the district court. *See* Dkt. Nos. 32-1; 33-1 to 33-4. The vast majority of these documents have “*SEALED*” printed across the top of each page of the document (*see, e.g.*, ER at 444) and/or have a “Filed Under Seal” or “[UNDER SEAL]” notation on the caption page of the first page of the document. *See, e.g.*, ER at 698, 806.

Less than 48 hours after the Opening Brief was filed, it appeared on the website teammichaeljackson.com², as seen below:

² Teammichaeljackson.com, which is not connected to the Estate, is run by an individual who has a personal relationship with Melissa Johnson, president of Appellants, and has previously posted documents, information, and videos “in support” of Ms. Johnson, as well as slanderous statements regarding the Estate and its Co-Executors. Boyajian Decl., ¶ 12, Ex. E. She has also sought donations for Appellants’ “Defense Fund.” *Id.*



Boyajian Decl., ¶ 11. The website indicates that it intends to publish the ER as well: “For the time being we are only publishing this one document, to give you an idea of what is to come. There are further 4 documents with excess of 1080 pages we will publish at a later date.” *Id.*

It is thus clear that should these documents remain in the public record and available on this Court’s Electronic Case Files, they will be published and widely distributed, in direct violation of the district court’s orders. Such publication would cause irreparable harm to Appellees, as the Estate is involved in ongoing litigation with a number of third parties (*id.* at 13) who may use the confidential documents, including the Settlement Agreement, to gain some perceived tactical advantage.

III. ARGUMENT

A. Ninth Circuit Procedure Regarding Sealed Documents.

The Ninth Circuit Rules (“Rules”) plainly set forth the procedures parties must follow in filing sealed documents. Rule 25-5 (b)(9) expressly exempts from electronic filing in the Court’s Electronic Case files “Documents to be maintained under seal...under Circuit Rule 27-13. Rule 27-13(b) provides: “If the filing of any specific document or part of a document under seal is required by statute or a protective order entered below, the filing party shall file the materials or affected parts under seal together with an unsealed and separately captioned notification setting forth the reasons the sealing is required....Any document filed under seal shall have prominently indicated on its cover and first page the words ‘under seal.’” Rule 27-13(b).

The Circuit Advisory Committee Note to Rule 27-13 provides: “Absent an order to the contrary, ***any portion of the district court or agency record that was sealed below shall remain under seal upon transmittal to this Court.***” (emphasis added). *See also United States v. Doe*, 488 F.3d 1154, 1156 (9th Cir. 2007) (“Because the pleadings by the government were filed under seal in the district court, and because the briefs and records have remained sealed on appeal, *see* Circuit Advisory Committee Note to 9th Cir. R. 27-13, we grant the motion to file a pseudonymous disposition and refer to the defendant herein as ‘John Doe.’”)

Should a party wish to unseal a document, it must follow the procedure set forth in Rule 27-13(d): “A motion to unseal may be made on any grounds permitted by law. During the pendency of an appeal, any party may file a motion with this Court requesting that matters filed under seal either in the district court or this Court be unsealed. Any motion shall be served on all parties.” Rule 27-13(d). Appellees have not been served with any motion to

unseal, and based on the Court's electronic docket, it does not appear that Appellants filed any such motion. Boyajian Decl., ¶ 10.

B. Appellants Filed Confidential, Sealed Documents In The Public Record Despite Their Undeniable Knowledge That The Documents Were Under Seal Pursuant To Court Order.

As set forth above, since the district court issued its order requiring that document referencing the confidential Settlement Agreement be filed under seal, Appellants had complied with the district court's order and filed those documents under seal. Appellants also knew that those documents were still under seal.

Nevertheless, in knowing violation of the district court's order and Circuit Rules 25-5 and 27-13, Appellants filed hundreds of pages of sealed documents in the public record as part of their Opening Brief and ER.

IV. CONCLUSION

Appellees respectfully request that the Court: (1) strike the ER and the Opening Brief and order it immediately deleted from the Court's Electronic Case Files and any other publicly accessible files; (2) order that Appellants file in strict adherence to this Court's rules and procedures regarding sealed documents all documents under seal in the court below that Appellants wish to include in their Sealed Excerpts of Record; and (3) order that Appellees' Responding Brief is not due until 30 days after Appellants file and serve their revised Excerpts of Record, their Sealed Excerpts of Record, and their revised Opening Brief.

Dated: February 26, 2013

GREENBERG TRAURIG, LLP

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Attorneys for Plaintiffs-Appellees John
G. Branca, Co-Executor of the Estate of
Michael J. Jackson; John McClain, Co-
Executor of the Estate of Michael J.
Jackson; Triumph International, Inc.

**Certificate of Compliance Pursuant to 9th Circuit Rules 28-4, 29-2(c)(2)
and (3), 32-2 or 32-4**

This brief complies with the length limits set forth at Ninth Circuit Rule 32-4. The brief's type size and type face comply with Fed. R. App. P. 32(a)(5) and (6).

Dated: February 26, 2013

GREENBERG TRAURIG, LLP

By: /S/ NINA D. BOYAJIAN
NINA D. BOYAJIAN

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G. Branca, Co-Executor of the Estate of
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Jackson; Triumph International, Inc.

9th Circuit Case
Number(s)

11-56926, 11-57048 (Consolidated)

CERTIFICATE OF SERVICE

All Case Participants are Registered for the Appellate CM/ECF System

I hereby certify that I electronically filed the foregoing
**EMERGENCY MOTION UNDER CIRCUIT RULE 27-3 TO STRIKE
APPELLANTS' EXCERPTS OF RECORD AND OPENING BRIEF
BECAUSE THEY INCLUDE AND REFERENCE SEALED
DOCUMENTS FILED IN THE PUBLIC RECORD IN VIOLATION OF
NINTH CIRCUIT RULES 27-13 AND 25-5** with the Clerk of the Court for
the United States Court of Appeals for the Ninth Circuit by using the
appellate CM/ECF system on February 26, 2013.

I certify that all participants in the case are registered CM/ECF users
and that service will be accomplished by the appellate CM/ECF system to the
following party(ies):

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The Law Offices of Gary Brown
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*Counsel for Defendants-Appellants Heal the World Foundation and United
Fleet*

Signature

/s/ Nina D. Boyajian

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

EMERGENCY MOTION UNDER CIRCUIT RULE 27-3

JOHN G. BRANCA, Special
Administrator of the Estate of Michael
J. Jackson; JOHN MCCLAIN, Special
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J. Jackson; TRIUMPH
INTERNATIONAL, INC.,

Plaintiffs/Appellees,

vs.

HEAL THE WORLD
FOUNDATION, California
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Defendants/Appellants.

Case Number(s):
11-56926, 11-57048 (Consolidated)

C.D. No. 2:09-cv-07084-DMG
Central District of California,
Los Angeles

**DECLARATION OF NINA D.
BOYAJIAN IN SUPPORT OF
APPELLEES' EMERGENCY
MOTION UNDER CIRCUIT
RULE 27-3 TO STRIKE
APPELLANTS' EXCERPTS OF
RECORD AND OPENING
BRIEF BECAUSE THEY
INCLUDE AND REFERENCE
SEALED DOCUMENTS FILED
IN THE PUBLIC RECORD IN
VIOLATION OF NINTH
CIRCUIT RULE 27-13**

DECLARATION OF NINA D. BOYAJIAN

I, Nina D. Boyajian, declare and state:

1. I am an associate with the law firm of Greenberg Traurig, LLP, counsel of record for Plaintiffs-Appellees John G. Branca and John McClain, Co-Executors of the Estate of Michael J. Jackson (“Estate”) and Triumph International, Inc. (collectively, “Appellees”). I am licensed to practice law in the State of California and before this Court. I have personal knowledge of the facts set forth in this Declaration and, if called and sworn as a witness, I could and would testify competently with respect thereto. I submit this Declaration in support of Appellees’ Emergency Motion Under Circuit Rule 27-3 to Strike Appellants’ Excerpts of Record and Opening Brief Because They Include and Reference Sealed Documents Filed in the Public Record in Violation of Ninth Circuit Rule 27-13.

2. On April 19, 2011, the first day of trial, the district court held an in-chambers conference wherein the parties advised the court of the settlement that had been reached in the litigation. The conference was held in chambers as a result of the confidentiality provision in the Settlement Agreement. The parties’ counsel also advised the court that they expected to submit a stipulated dismissal and permanent injunction and final judgment reflecting the terms of the Settlement Agreement.

3. Notwithstanding these representations and the parties’ execution of the binding Settlement Agreement, Appellants breached the Settlement Agreement and unsuccessfully argued, through their attorney at the time, that it should not be enforced.

4. After considering Appellants’ numerous oppositions to Appellees’ Motion to Enforce the Settlement Agreement, allowing for oral argument on the motion, and providing Appellants an opportunity to

participate in the drafting of an order enforcing the Settlement Agreement, the district court ultimately rejected Appellants' arguments and enforced the agreement by Order dated June 27, 2011, and by a Judgment and injunction of the same date. *See* ER at 821-827.

5. The court also ordered that as a result of the confidentiality provision in the Settlement Agreement, all motions or briefing relating to the agreement must be filed under seal. Attached hereto as Exhibit A is a true and correct copy of the district court's June 1, 2011 order requiring that the parties file their briefs and supporting documents relating to the enforcement of the Settlement Agreement under seal "because the parties' Settlement Agreement includes a confidentiality provision." (District Ct. Dkt. No. 194). The June 1, 2011 order largely paralleled the court's May 19, 2011 order, a true and correct copy of which is attached hereto as Exhibit B. Consequently, the district court's June 27, 2011 Order and Judgment were both filed under seal.

6. After missing their deadline to file a notice of appeal, Appellants sought an extension of time, which was granted by the district court.

7. Shortly thereafter, on September 19, 2011, Appellants filed a Motion for Relief from Judgment, which largely regurgitated the arguments Appellants had made in opposition to Appellees' Motion to Enforce the Settlement Agreement. Appellants' motion was denied by the district court on the basis, *inter alia*, that there was no newly discovered evidence warranting relief, and finding that the Settlement Agreement could not be more clear as to its legal effect. The Court's October 27, 2011 order was filed under seal.

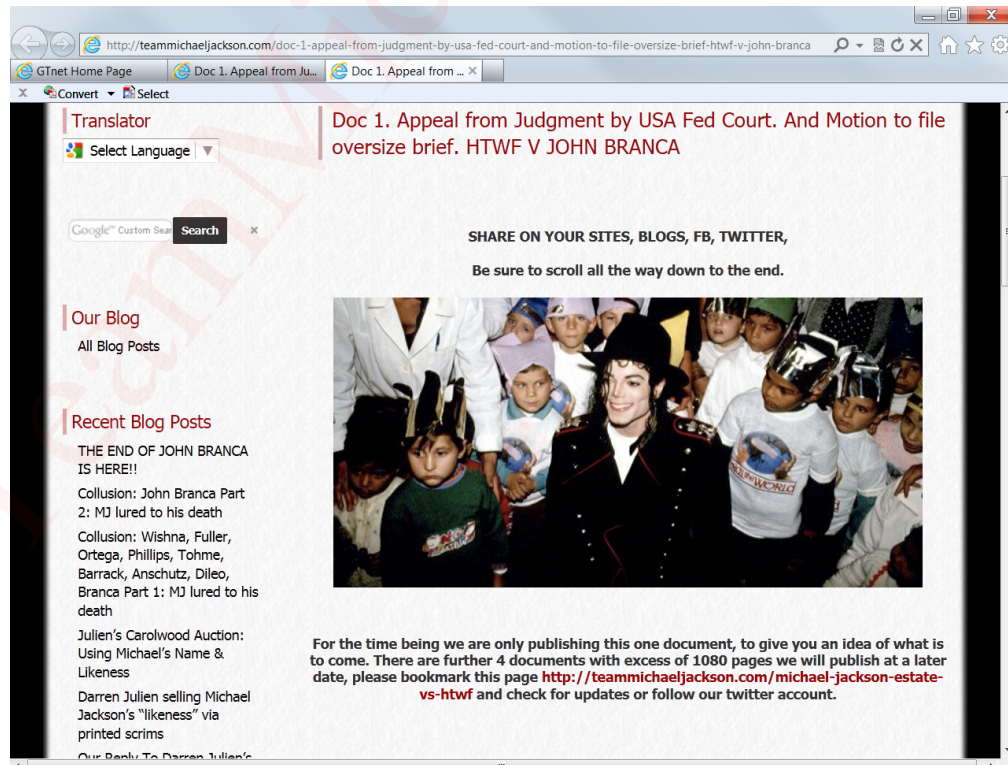
8. In accordance with the district court's order, Appellants filed the June 27, 2011 Order, the October 27, 2011 Amended Judgment, and the

October 27, 2011 Order denying Appellants' Motion for Relief from Judgment, under seal when they filed their Notices of Appeal. *See* EOR at 1010-12, November 22, 2011 Notice of Appeal. Attached hereto as Exhibit C is a true and correct copy of Appellants' November 1, 2011 Notice of Appeal.

9. On July 25, 2012, Appellants' counsel filed a motion in the district court requesting that documents be unsealed with respect to Appellants' counsel. That motion was granted on August 22, 2012. (District Ct. Dkt. No. 316). Attached hereto as Exhibit D is a true and correct copy of the district court's August 22, 2012 order.

10. As of this writing, Appellees' have not been served with a motion to unseal documents, and no such motion appears on the Court's electronic docket.

11. Less than 48 hours after the Opening Brief was filed, it appeared on the website teammichaeljackson.com – a website not connected to the Estate -- as seen below:



The website indicates that it intends to publish the complete Excerpts of Record as well: “For the time being we are only publishing this one document, to give you an idea of what is to come. There are further 4 documents with excess of 1080 pages we will publish at a later date.”

12. Throughout the litigation of this action, I have learned that Melissa Johnson, president of Appellants, has a personal relationship with the individual who runs the teammichaeljackson.com website. That individual has previously posted documents, information, and videos “in support” of Ms. Johnson, as well as slanderous statements regarding the Estate and its Co-Executors. She has also sought donations for Appellants’ “Defense Fund.” Attached hereto as Exhibit E is a true and correct copy of a printout from teammichaeljackson.com.

13. It is thus clear that should these documents remain in the public record, they will be published and widely distributed. Such publication would cause irreparable harm to Appellees, as the Estate is involved in ongoing litigation with a number of third parties who may use the confidential documents, including the Settlement Agreement, to gain some perceived tactical advantage. In order to avoid further irreparable harm, Appellees’ certify that relief is needed in less than 21 days.

14. Both the Clerk of this Court (Emergency Motions division) and Appellants’ counsel were notified of this Motion on February 25, 2013.

Appellants' counsel will be served with the Motion at the same time it is filed with the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed this 26th day of February, 2013 at Los Angeles, California.

/S/ NINA D. BOYAJIAN

NINA D. BOYAJIAN

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Jackson; Triumph International, Inc.

9th Circuit Case
Number(s)

11-56926, 11-57048 (Consolidated)

CERTIFICATE OF SERVICE

All Case Participants are Registered for the Appellate CM/ECF System

I hereby certify that I electronically filed the foregoing **DECLARATION OF NINA D. BOYAJIAN IN SUPPORT OF APPELLEES' EMERGENCY MOTION UNDER CIRCUIT RULE 27-3 TO STRIKE APPELLANTS' EXCERPTS OF RECORD AND OPENING BRIEF BECAUSE THEY INCLUDE AND REFERENCE SEALED DOCUMENTS FILED IN THE PUBLIC RECORD IN VIOLATION OF NINTH CIRCUIT RULE 27-13** with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the appellate CM/ECF system on February 26, 2013.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system to the following party(ies):

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The Law Offices of Gary Brown
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Counsel for Defendants-Appellants Heal the World Foundation and United Fleet

Signature

/s/ Nina D. Boyajian

Exhibit A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
CIVIL MINUTES—GENERALCase No. CV 09-07084 DMG (PLAx) Date June 1, 2011Title John G. Branca, et al. v. Heal the World Foundation, et al. Page 1 of 1Present: The Honorable DOLLY M. GEE, UNITED STATES DISTRICT JUDGEVALENCIA VALLERY

Deputy Clerk

NOT REPORTED

Court Reporter

Attorneys Present for Plaintiff(s)
None PresentAttorneys Present for Defendant(s)
None Present

**Proceedings: IN CHAMBERS—AMENDED ORDER GRANTING PLAINTIFFS' EX
PARTE APPLICATION FOR ORDER SHORTENING TIME RE:
PLAINTIFFS' MOTION TO ENFORCE PARTIES' FULLY EXECUTED
SETTLEMENT AGREEMENT AND TO FILE MOTION UNDER SEAL
[175]**

The Court has considered the *Ex Parte* Application of Plaintiffs John G. Branca and John McClain, Co-Executors of the Estate of Michael J. Jackson (the "Estate") and Triumph International, Inc. (collectively, "Plaintiffs"), for an order requesting that Plaintiffs' Motion to Enforce Parties' Fully Executed Settlement Agreement ("Motion") be heard on shortened notice and be filed under seal (the "Application"). Good cause having been shown, pursuant to Local Rules 7-19 and L.R. 79-5.1, Plaintiffs' Application is **GRANTED**. In addition, because the parties' Settlement Agreement includes a confidentiality provision, good cause exists for allowing the parties to file their briefs and supporting documents under seal pursuant to the procedures set forth in L.R. 79-5.1.

Mel Wilson, purporting to represent Defendants, informed Plaintiffs' counsel of Defendants' alleged breach of the fully executed Settlement Agreement on May 13, 2011, less than six days before the parties were ordered to file a stipulated dismissal or joint status report. As a result of Plaintiffs' counsels' travel schedules, if required to provide the minimum 28-day notice period, the Motion could not be heard before July 11, 2011, a delay that would cause prejudice to Plaintiffs in that they would not receive the benefits of their negotiated confidential settlement. In the interest of justice, the Court orders that Plaintiffs' Motion be heard on shortened notice, on **June 14, 2011 at 10:00 a.m.** Plaintiffs' moving papers shall be filed by no later than **May 26, 2011**. Opposing papers shall be filed under seal pursuant to L.R. 79-5.1 no later than **June 2, 2011**. Plaintiffs' Reply, if any, is due on **June 7, 2011**.

IT IS SO ORDERED.

Exhibit B

NOTE: CHANGES MADE BY THE COURT

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13 McClain, Special Administrators of the Estate of
14 Michael J. Jackson; Triumph International, Inc.

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION

14 JOHN G. BRANCA, Special
15 Administrator of the Estate of Michael J.
16 Jackson; JOHN MCCLAIN, Special
17 Administrator of the Estate of Michael J.
18 Jackson; TRIUMPH INTERNATIONAL,
19 INC., a California corporation,

20 Plaintiffs,

21 vs.

22 HEAL THE WORLD FOUNDATION, a
23 California corporation; UNITED FLEET,
24 a California corporation; and DOES 1-10,
25 inclusive,

26 Defendants.

CASE NO. CV-09-07084 DMG (PLAx)

**ORDER GRANTING PLAINTIFFS' *EX*
PARTE APPLICATION FOR ORDER
SHORTENING TIME RE:
PLAINTIFFS' MOTION TO ENFORCE
PARTIES' FULLY EXECUTED
SETTLEMENT AGREEMENT AND TO
FILE MOTION UNDER SEAL [175]**

1 The Court has considered the *Ex Parte* Application of Plaintiffs John G. Branca
2 and John McClain, Co-Executors of the Estate of Michael J. Jackson (the "Estate") and
3 Triumph International, Inc. (collectively, "Plaintiffs"), for an order requesting that
4 Plaintiffs' Motion to Enforce Parties' Fully Executed Settlement Agreement
5 ("Motion") be heard on shortened notice and be filed under seal (the "Application").
6 Good cause having been shown, pursuant to Local Rules 7-19 and L.R. 79-5.1,
7 Plaintiffs' Application is GRANTED. In addition, because the parties' Settlement
8 Agreement includes a confidentiality provision, good cause exists for allowing the
9 parties to file their briefs and supporting documents under seal pursuant to the
10 procedures set forth in L.R. 79-5.1.

11 Defendants informed Plaintiffs' counsel of their breach of the fully executed
12 Settlement Agreement on May 13, 2011, less than six days before the parties were
13 ordered to file a stipulated dismissal or joint status report. As a result of Plaintiffs'
14 counsels' travel schedules, if required to provide the minimum 28-day notice period,
15 the Motion could not be heard before July 11, 2011, a delay that would cause prejudice
16 to Plaintiffs in that they would not receive the benefits of their negotiated confidential
17 settlement. Because Plaintiffs were not at fault for creating the reasons necessitating
18 the shortened notice (or the Motion), the Court orders that Plaintiffs' Motion be heard
19 on shortened notice, on **June 14, 2011 at 10:00 a.m.** Plaintiffs' moving papers shall
20 be filed by no later than **May 26, 2011**. Opposing papers shall be filed under seal
21 pursuant to L.R. 79-5.1 no later than **June 2, 2011**. Plaintiffs' Reply, if any, is due on
22 **June 7, 2011**.

23 IT IS SO ORDERED.

24
25 Dated: May 19, 2011


26 
27 DOLLY M. GEE
28 United States District Judge

Exhibit C

Case 2:09-cv-07084-DMG -PLA Document 293 Filed 11/01/11 Page 1 of 4 Page ID #:10564

Name Steven C. Smith SBN 116246
 Address 1800 North Broadway, Suite 200
 City, State, Zip Santa Ana, CA 92706
 Phone (714) 550 7720
 Fax (714) 550-1251
 E-Mail ssmith@scckg.com
☐ FPD ☐ Appointed ☐ CJA ☐ Pro Per ☒ Retained

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOHN G. BRANCA, et al.

PLAINTIFF(S),

v.

HEAL THE WORLD FOUNDATION, et al.

DEFENDANT(S).

CASE NUMBER:

CV-09-07084 DMG [PLAx]

NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN that Defendants: Heal the World Foundation and United Fleet hereby appeals to
Name of Appellant
 the United States Court of Appeals for the Ninth Circuit from:

Criminal Matter

- ☐ Conviction only [F.R.Cr.P. 32(j)(1)(A)]
☐ Conviction and Sentence
☐ Sentence Only (18 U.S.C. 3742)
☐ Pursuant to F.R.Cr.P. 32(j)(2)
☐ Interlocutory Appeals
☐ Sentence imposed:

☐ Bail status:**Civil Matter**

- ☒ Order (specify):
 Filed under seal June 27, 2011 (#220)
☒ Judgment (specify):
 Filed under seal October 27, 2011 (#292)
☐ Other (specify):

Imposed or Filed on October 27, 2011. Entered on the docket in this action on October 28, 2011.

~~XXXXXX See Judgment or Order attached hereto XXXX~~

A copy of Order and Judgment are NOT attached as Exhibits A and B respectively, but filed separately under seal.

November 1, 2011
 Date

/s/ Steven C. Smith
 Signature
☐ Appellant/ProSe ☒ Counsel for Appellant ☐ Deputy Clerk

Note: The Notice of Appeal shall contain the names of all parties to the judgment or order and the names and addresses of the attorneys for each party. Also, if not electronically filed in a criminal case, the Clerk shall be furnished a sufficient number of copies of the Notice of Appeal to permit prompt compliance with the service requirements of FRAP 3(d).

Steven C. Smith, State Bar No. 116246
SMITH CAMPBELL CLIFFORD KEARNEY GORE
1800 North Broadway, Suite 200
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Email: ssmith@scckg.com

Attorneys for Defendants
HEAL THE WORLD FOUNDATION and
UNITED FLEET

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JOHN G. BRANCA, Special
Administrator of the Estate of Michael
J. Jackson; JOHN MCCLAIN, Special
Administrator of the Estate of
Michael J. Jackson; TRIUMPH
INTERNATIONAL, INC., a California
corporation,

Plaintiffs,

vs.

HEAL THE WORLD FOUNDATION,
a California corporation; UNITED
FLEET, a California corporation; and
DOES 1-10, inclusive,

Defendants.

CASE NO: CV-09-07084 DMG [PLAx]

Honorable Dolly M. Gee
Courtroom 7

**EX. A TO NOTICE OF APPEAL
FILED BY DEFENDANTS ON
NOVEMBER 1, 2011– SEALED
DOCUMENT: ORDER RE
PLAINTIFFS' MOTION TO
ENFORCE PARTIES' FULLY
EXECUTED SETTLEMENT
AGREEMENT FILED JUNE 27, 2011**

EX. A TO NOTICE OF APPEAL FILED BY DEFENDANTS NOV. 1, 2011

Steven C. Smith, State Bar No. 116246
SMITH CAMPBELL CLIFFORD KEARNEY GORE
1800 North Broadway, Suite 200
Santa Ana, California 92706
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Attorneys for Defendants
HEAL THE WORLD FOUNDATION and
UNITED FLEET

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JOHN G. BRANCA, Special
Administrator of the Estate of Michael
J. Jackson; JOHN MCCLAIN, Special
Administrator of the Estate of
Michael J. Jackson; TRIUMPH
INTERNATIONAL, INC., a California
corporation,

Plaintiffs,

vs.

HEAL THE WORLD FOUNDATION,
a California corporation; UNITED
FLEET, a California corporation; and
DOES 1-10, inclusive,

Defendants.

CASE NO: CV-09-07084 DMG [PLAx]

Honorable Dolly M. Gee
Courtroom 7

**EX. B TO NOTICE OF APPEAL
FILED BY DEFENDANTS ON
NOVEMBER 1, 2011– SEALED
DOCUMENT: AMENDED
JUDGMENT ENTERED OCTOBER
28, 2011**

EX. B TO NOTICE OF APPEAL FILED BY DEFENDANTS NOV. 1, 2011

PROOF OF SERVICE***Branca et al. vs. Heal the World Foundation, et al.***

I declare that I am employed in the City of Santa Ana, County of Orange, State of California. I am over the age of eighteen years and not a party to the within action; my business address is: 1800 North Broadway, Suite 200, Santa Ana, California 92706

On November 1, 2011, I served the foregoing document(s):

<p align="center">NOTICE OF APPEAL; REPRESENTATION DOCUMENT; SERVICE LIST</p>
--

on all interested parties in this action by placing [] the original [X] a true copy thereof, enclosed in a sealed envelope with postage pre-paid, addressed as follows:

<p>Vincent H. Chieffo, State Bar No. 49069 GREENBERG TRAUERIG, LLP 2450 Colorado Avenue, Suite 400E Santa Monica, CA 90404-5524 Phone: (310) 586-7700 Fax: (310) 586-7800 <i>ChieffoV@gtlaw.com</i></p>	<p>Attorneys for Plaintiffs John G. Branca and John McClain, Special Administrators of the Estate of Michael J. Jackson, Triumph International, Inc.</p>
<p>Nina D. Boyajian, State Bar No. 246415 GREENBERG TRAUERIG, LLP 1601 Cloverfield Blvd., Suite 4000N Santa Monica, CA 90404-5524 Phone: (310) 586-7700 Fax: (310) 586-7800 <i>BoyajianN@gtlaw.com</i></p>	<p>Attorneys for Plaintiffs John G. Branca and John McClain, Special Administrators of the Estate of Michael J. Jackson, Triumph International, Inc.</p>

[X] By ELECTRONIC FILE TRANSFER TO ECF FILE & SERVE:

By transmitting a true copy of the document(s) listed above for service on all parties in this case pursuant to applicable statutes, local rules and/or order of the Court.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on November 1, 2011, at Santa Ana, California.

/s/ Kaylene Canaan
Kaylene Canaan

SERVICE LIST*Branca et al. vs. Heal the World Foundation, et al.*

<p>Vincent H. Chieffo, State Bar No. 49069 GREENBERG TRAURIG, LLP 2450 Colorado Avenue, Suite 400E Santa Monica, CA 90404-5524 Phone: (310) 586-7700 Fax: (310) 586-7800 ChieffoV@gtlaw.com</p>	<p>Attorneys for Plaintiffs John G. Branca and John McClain, Special Administrators of the Estate of Michael J. Jackson, Triumph International, Inc.</p>
<p>Nina D. Boyajian, State Bar No. 246415 GREENBERG TRAURIG, LLP 1601 Cloverfield Blvd., Suite 4000N Santa Monica, CA 90404-5524 Phone: (310) 586-7700 Fax: (310) 586-7800 BoyajianN@gtlaw.com</p>	<p>Attorneys for Plaintiffs John G. Branca and John McClain, Special Administrators of the Estate of Michael J. Jackson, Triumph International, Inc.</p>
<p>Steven C. Smith, State Bar No. 116246 SMITH CAMPBELL CLIFFORD KEARNEY GORE 1800 North Broadway, Suite 200 Santa Ana, California 92706 Telephone: (714) 550-7720 Facsimile: (714) 550-1251 Email: ssmith@scckg.com</p>	<p>Attorneys for Defendants HEAL THE WORLD FOUNDATION and UNITED FLEET</p>

Exhibit D

Jeremy D. Eveland, MBA, JD (231552)
Jared B. Pearson
EVELAND & ASSOCIATES
8833 South Redwood Road, Suite C
West Jordan, Utah 84088
Telephone: (801) 676-5506
Facsimile: (801) 676-5508
Attorneys for Appellants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JOHN G. BRANCA, ET AL.

Plaintiff-counter-defendant-Appellee,

vs.

HEAL THE WORLD FOUNDATION,
UNITED FLEET,


Defendant-counter-claimant-Appellant,

Case No. CV 09-7084-DMG (PLAx)

**ORDER GRANTING REQUEST TO
UNSEAL DOCUMENTS AS TO
ATTORNEY OF RECORD IN APPEALS
CASE [312]**

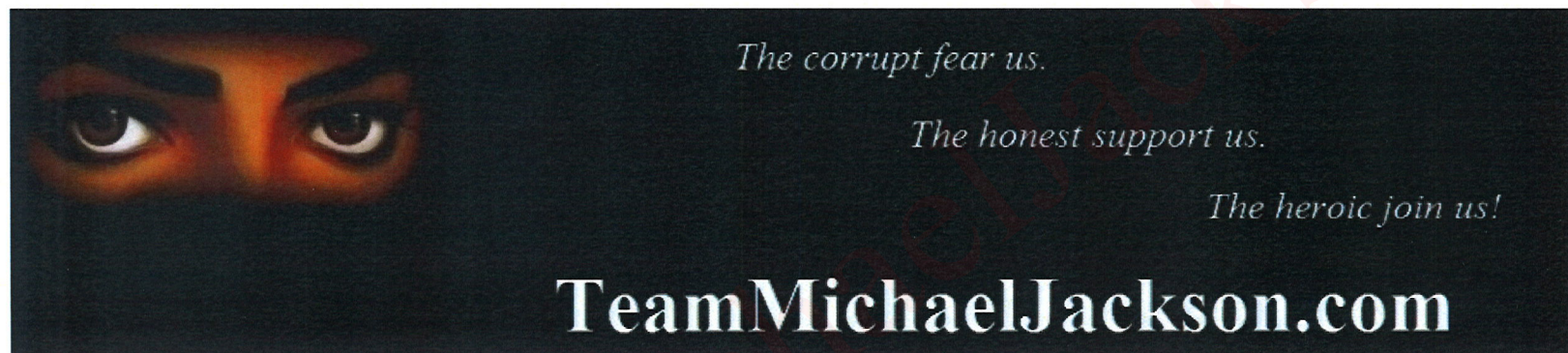
Upon motion of the Defendant, and good cause appearing, IT IS HEREBY ORDERED that attorney Jeremy D. Eveland, Defendants' appellate counsel in their pending appeal with the 9th Circuit Court of Appeals, be allowed access to all sealed documents and filings in the above-referenced case.

DATED: August 22, 2012


DOLLY M. GEE
United States District Judge

cc: jared@evelandlawfirm.com

Exhibit E



Doc 1. Appeal from Judgment by USA Fed Court. And Motion to file oversized brief. HTWF V JOHN BRANCA

SHARE ON YOUR SITES, BLOGS, FB, TWITTER,

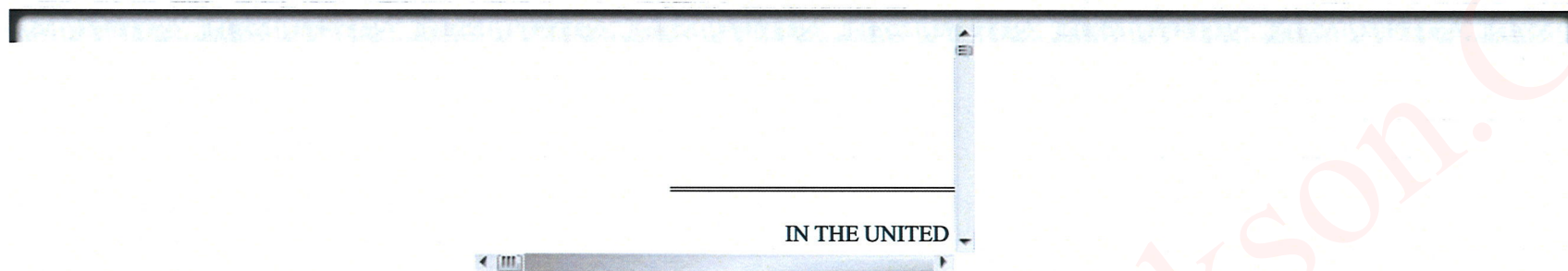
Be sure to scroll all the way down to the end.



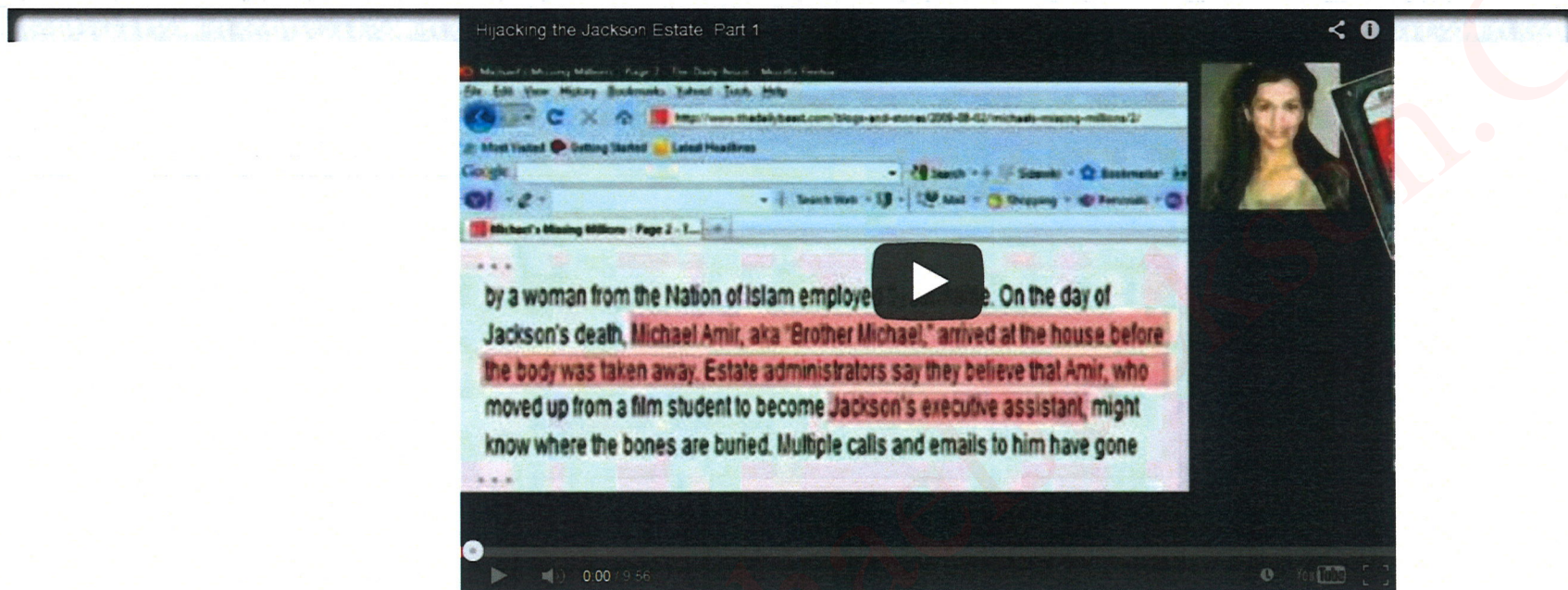


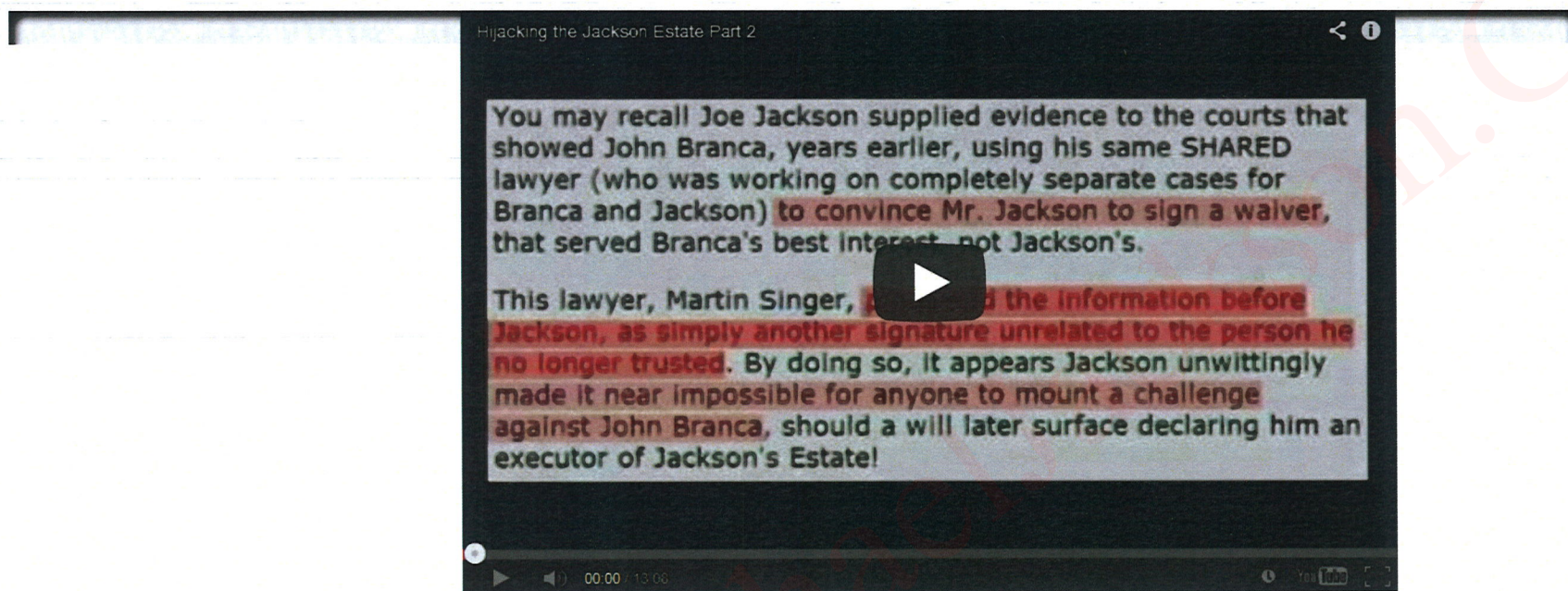
For the time being we are only publishing this one document, to give you an idea of what is to come. There are further 4 documents with excess of 1080 pages we will publish at a later date, please bookmark this page <http://teammichaeljackson.com/michael-jackson-estate-vs-htwf> and check for updates or follow our twitter account.

Doc 1. Appeal from Judgment by USA Fed Court. And Motion to file oversize brief. HTWF V JOHN BRANCA



If you are new to this, and don't know what this is all about, watch these videos:-











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MJ Estate VS HTWF





DEFENSE FUND

click the above!

This case presently is in the Appellate court. We urge you to donate to the HTWF defense fund!!!!

THANK YOU to all those that donated!! You are truly **"Michael's Army of Love"**

HTWF V JOHN BRANCA et All

02/22/13 Doc 1. Appeal from Judgment by USA Fed Court. And Motion to file oversize brief. HTWF V JOHN BRANCA

01/26/13 Opposed motion for an additional extension granted

01/11/13 John G. Branca, John McClain response opposing motion

01/06/13 HTWF Motion to extend time to file

11/27/12 Heal The World Foundation Motion to Extend time to file brief, GRANTED

11/14/12 APPELLEES' OPPOSITION TO APPELLANTS' MOTION TO EXTEND TIME TO FILE OPENING BRIEF

11/11/12 Motion to extend time

11/08/12 Application for Appointment of Counsel. HTWF

09/11/12 Order, Granted, HTWF to Withdraw Counsel and Extend time.

08/28/12 John Branca Objection to HTWF Motion to Withdraw Counsel and Extend Time

06/11/12 ORDER, Extension Approved

06/04/12 APPELLEES' RESPONSE TO APPELLANTS' MOTION TO EXTEND TIME TO FILE BRIEF

06/04/12 DECLARATION OF NINA D. BOYAJIAN IN SUPPORT OF APPELLEES' RESPONSE TO APPELLANTS' MOTION TO EXTEND TIME TO FILE BRIEF

05/23/12 Motion to Extend Time To file brief

03/07/12 Mediation Questionnaire

11/11/11 HTWF v JOHN BRANCA-Summary

10/11/11 Reply to plaintiffs Opposition to defendants' motion for extension of time to file notice of Appeal

09/19/11 Notice of Motion and Motion for Relief From Judgement.

09/02/11 Minutes of in Chambers Order Directive No Proceeding Held

09/01/11 Derrick Hughes Declaration (Motion related)

09/01/11 Memorandum in Opposition to Motion.

08/29/11 Notice of Manual Filing

08/29/11 Proposed Order Order on Request for Approval of Substitution of Attny

08/29/11 Declaration Smith Decl in Support of Request for Approval of Substitution of Att.

06/01/11 IN CHAMBERS"AMENDED ORDER GRANTING PLAINTIFFS' EX PARTE APPLICATION FOR ORDER SHORTENING TIME RE: PLAINTIFFS' MOTION TO ENFORCE PARTIES' FULLY EXECUTED SETTLEMENT AGREEMENT AND TO FILE MOTION UNDER SEAL [175]

05/18/11 Proposed Order Granting Plaintiff Shortening Time

05/18/11 Branca up to his Dirty Tricks again!

05/16/11 HTWF Revoke Brancas settlement

05/06/11 Branca acting before the Judges Ruling

04/24/11 John Branca a(MJ Estate) VS MJ Fans!!

04/19/11 Exhibit List

04/15/11 Revised Joint Trial Exhibit

04/15/11 Plaintiffs Ex Parte application for Order to Excluding Defendants' Exhibits

04/15/11 PLAINTIFFS' OBJECTIONS TO MANN AND OXMANS DEPOSITIONS

04/14/11 Mrs. Jackson verbally attacked by John Branca!!

04/14/11 Witness statement of Karen Landford

04/14/11 Declaration Edgar Pease 4 Exhibits

04/13/11 PLAINTIFF'S EX PARTE APPLICATION FOR AN ORDER EXCLUDING DEFENDANT'S EXHIBITS

04/12/11 Declaration of Sebacious Felix, Bravado

04/12/11 DECLARATION: HTWF President: Melissa Johnson

04/12/11 DECLARATION: Vice President HTWF: Melvin Wilson

04/12/11 DECLARATION EVAN SPEIGAL

04/11/11 Defending Mrs. Jackson and HTWF

04/11/11 DECLARATION: Brian Oxman

04/08/11 DECLARATION: John G. Branca

04/06/11 DECLARATION: Mrs Jackson

04/04/11 DECLARATION: Raymone Bain

03/04/11 STATUS REPORT REGARDING SETTLEMENT

03/07/11 Full witness List

02/24/11 HTWF-SECRETARY OF STATE

00/27/10 FOR IMMEDIATE RELEASE

00/22/10 HTWF-MJ FAMILY-VIDEOS

00/20/10 JOHN BRANCA MORE NEGLIGENCE

00/12/10 JOHN BRANCA INVESTIGATED

00/02/10 JOHN BRANCAS' SEVERE NEGLECT
 00/11/10 ESTATE V HTWF TIME LINE
 10/14/10 GAG ORDER Denied
 10/13/10 GAG ORDER
 12/20/10 JACKSON FAMILY DECLARATION
 00/00/10 ESTATE LIES-VIDEOS

Click Image to enlarge, If Melissa is a "Fraud" how is this possible, "Michael Jacksons Heal The World Foundation, Melissa Jonhson, April 15th 2002?"

There are hundreds of documents like this, Official documentation linking Mel to MJ!

CERTIFICATE OF REGISTRATION

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

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For a Non-dramatic Literary Work
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TXu 1-027-960

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Marybeth Peters
REGISTER OF COPYRIGHTS
United States of America

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK
THE REVIVED HTWF (HEAL THE WORLD FOUNDATION) LAUNCHES MICHAEL'S ARMY!

PREVIOUS OR ALTERNATIVE TITLES
HTWF INITIATIVES, THE REVIVAL OF HTWF HTWF HEAL THE WORLD FOUNDATION

PUBLICATION AS A CONTRIBUTION If this work was published in a newspaper, journal, or collection, give information about the publication in which the contribution appeared. Title of Collection Work

If published in a periodical or serial give: Volume Number Issue Date On Pages

2

NAME OF AUTHOR
MELISSA JOHNSON

DATES OF BIRTH AND DEATH
Year Born Year Died
ALIVE

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

AUTHOR'S NATIONALITY OR DOMICILE
Citizen of ☒ UNITED STATES ☐ Foreign ☐ Stateless

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? ☐ Yes ☒ No
Pseudonym? ☐ Yes ☒ No

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