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21 *Attorneys for* GENEVIEVE JACKSON, RANDY JACKSON, JR.,
22 DONTÉ WILLIAMS JACKSON, *and* ALEJANDRA JACKSON.

23 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
24 **IN AND FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

25 In re the Matter of the Estate of,

26 MICHAEL JOSEPH JACKSON,

27 Decedent.

28 Case No.: BP117321

**NOTICE OF INTENT TO VOLUNTARILY
WITHDRAW FROM IMMEDIATE
POSSESSION OF THE RESIDENCE AND
RESERVATION OF RIGHTS; REQUEST
FOR RE-DESIGNATION OF THE
“UNLAWFUL DETAINER” TRIAL DATE
OR, IN THE ALTERNATIVE, FOR THE
MATTER TO BE TAKEN OFF CALENDAR;
DECLARATION OF RESPONDENTS’
ATTORNEY ROBERT A. KASHFIAN**

Judge: Honorable Mitchell L. Beckloff

Trial Date: April 14th, 2011, 1:30pm

Dept: 5

Action Filed: June 29th, 2009

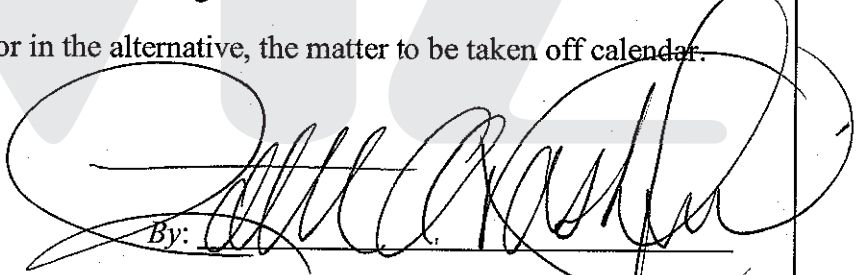
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TO THE CLERK OF COURT, ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT the Respondents currently residing at [REDACTED] and as legally defined in Exhibit A attached to the Executor's Petition which is hereby incorporated herein by reference (the "Residence"), will voluntarily vacate and withdraw from the immediate possession of the Residence no later than 9:30am April 14th, 2011, before the scheduled "Unlawful Detainer" Trial, set solely on the issue of immediate possession, thereby making the matter moot.

In light of the Court's March 15th, 2011 ruling and minute order of which the April 14th, 2011 Trial date was set with respect to issue of possession only, all other legal issues preserved, and as a gesture of good faith, Respondents will vacate the Residence without any prejudice to any and all claims and objections as set forth in the Respondents' filing dated March 2nd, 2011. Accordingly, Respondents request either a re-designation of the "Unlawful Detainer" Trial date to a case management conference, or in the alternative, the matter to be taken off calendar.

Respectfully Submitted,
this 8th day of April, 2011

By: 

ROBERT A. KASHFIAN, ESQ.
RYAN D. KASHFIAN, ESQ.
KASHFIAN LAW CORPORATION
OPHIR J. BITTON, ESQ.
BITTON & ASSOCIATES
GEORGE E. AKWO, ESQ.
LAW OFFICES OF GEORGE E. AKWO

Attorneys for GENEVIEVE JACKSON,
RANDY JACKSON, JR., DONTÉ
WILLIAMS JACKSON and
ALEJANDRA JACKSON

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DECLARATION OF RESPONDENTS / OBJECTORS'
ATTORNEY ROBERT A. KASHFIAN

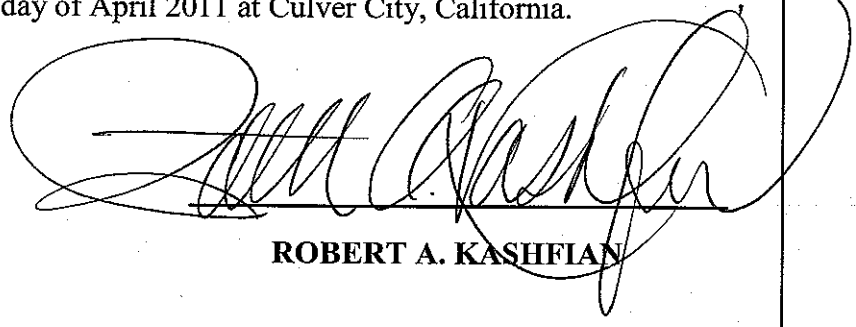
I, Robert A. Kashfian, declare as follows:

1) I am an attorney at law duly authorized to practice law before all courts in the State of California. I am the principle of KASHFIAN LAW CORPORATION, attorneys of record Genevieve Jackson, Randy Jackson, Jr., Dontè Williams Jackson, and Alejandra Jackson in the above-captioned matter (Case Number: BP117321). I have personal knowledge of the facts set forth in this declaration and could and would competently testify thereto if called as a witness in this action.

2) All named respondents in the above-entitled action have conveyed to me that each of them either have or will voluntarily withdraw from the immediate possession and will vacate the premises located at [REDACTED] which is legally defined in Exhibit A attached to Executor's Petition, no later than 9:30am April 14th, 2011, prior to the scheduled Trial date of April 14th, 2011 at 1:30pm.

3) In light of the matter forthwith becoming moot, I request that the "Unlawful Detainer" Trial date be re-designated as a Case Management Conference or, in the alternative, the Trial date be vacated and that the court set a future hearing date on the non-immediate possessory matters preserved in the Court's March 15th, 2011 ruling.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 8th day of April 2011 at Culver City, California.


ROBERT A. KASHFIAN

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PROOF OF SERVICE

X **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

California Code of Civil Procedure §§ 1013(a), 2015.5

I am employed and a resident of 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 [REDACTED]

 DISTRICT OF COLUMBIA

District of Columbia Superior Court Civil Procedure Rule 5 et seq.

Federal Rules of Civil Procedure Rule 5 et seq.

On April 8th, 2011, I served the document described as:

NOTICE OF INTENT TO VOLUNTARILY WITHDRAW FROM IMMEDIATE POSSESSION OF THE RESIDENCE AND RESERVATION OF RIGHTS; REQUEST FOR RE-DESIGNATION OF THE "UNLAWFUL DETAINER" TRIAL DATE OR, IN THE ALTERNATIVE, FOR THE MATTER TO BE TAKEN OFF CALENDAR; DECLARATION OF RESPONDENTS' ATTORNEY ROBERT A. KASHFIAN

upon the interested parties in this action in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

X **(By Mail)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Culver City, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after day of deposit for mailing contained in affidavit.

 (By Overnight Delivery) I deposited this document in the box or other facility located near [REDACTED] regularly maintained by Federal Express, in an envelope designated by Federal Express with delivery fees paid or provided for, addressed to the persons on whom it is to be served, for guaranteed next day delivery.

X **(By Facsimile Transmission)** I caused the foregoing document to be served by facsimile transmission to each of the interested parties at the facsimile machine telecopy number shown in the service list attached hereto.

1 X **(By Electronic Mail)** I caused the foregoing document to be served in “.pdf
2 format” from my electronic mail address, without error, situated and transmitted on
3 this office’s server for the web address www.kashfianlaw.com to each of the
interested parties at the email address shown in the service list attached hereto.

4 _____ **(By Personal Service)** I caused the delivery of such envelope by hand to the
5 offices of the addressee.

6 I am a Registered California Process Server:
7 *Owner* *Employee* *Independent Contractor*,
8 Registration No.: _____,
County of _____.

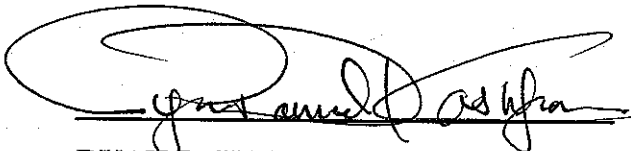
9 I am an Independent Contractor of a Registered Independent
10 California Process Server., Registration No.: _____,
11 County of _____.

12 X **(State of California)** I declare under penalty of perjury under the laws of the State of
13 California that the above is true and correct.

14 _____ **(District of Columbia)** I declare under penalty of perjury under the laws of the District of
15 Columbia that I am at least 18 years of age and not a party to the above entitled case and
16 that the forgoing information contained in this service is true and correct.

17 _____ **(Federal)** I declare that I am employed in the office of a member of the bar of this court
18 at whose direction the service was made.

19 Executed on this 8th day of April, 2011, at Culver City, California.

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22 **RYAN D. KASHFIAN**
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Re: In re the Matter of the Estate of Michael Joseph Jackson
LASC Case Number: BP117321

SERVICE LIST
Attached to Proof of Service

HOFFMAN, SABBAN & WATENMAKER
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JOHN MCCLAIN; and
THIRD PARTY CUSTODIANS
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Copy Via Electronic Mail Only
Co-Counsels of Record

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DONTÈ WILLIAMS JACKSON
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