

## State of New Jersey

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March 28, 2025

Honorable Marc C. Lemieux, A.J.S.C. Monmouth County Courthouse 71 Monument Park, 3<sup>rd</sup> Floor Freehold, NJ 07728

Re: State v. Paul Caneiro

Case No. 18-004915 / Indictment No. 19-02-283-I

## **Motion to Change Venue**

Dear Judge Lemieux:

Please accept this brief supplemental letter in further support of the defense's Motion to Change Venue. Since this Motion was initially filed on March 8, 2025, numerous additional articles/ media items have been released – particularly, in light of the Court's recent DNA/ <u>Daubert</u> decision. Attached hereto is defense's <u>Exhibit G</u>, which includes a list of these articles, and Exhibit H, which contains PDF versions of these items.

Sincerely,

/s/ Monika Mastellone

Monika Mastellone, Esq. 122942014

/s/ Victoria Howard

Victoria Howard, Esq. 021052012

CC: AP Chris Decker; AP Nicole Wallace