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Attorneys for Defendant,  
 Sean Higgins

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STATE OF NEW JERSEY,	:	SUPERIOR COURT OF NEW JERSEY
	:	SALEM COUNTY-CRIMINAL DIVISION
Plaintiff,	:	
	:	
v.	:	INDICTMENT NO.: 24-12-400-I
	:	
SEAN HIGGINS	:	<b>NOTICE OF MOTION TO SUPPRESS</b>
	:	<b>DATA DERIVED FROM THE WARRANTS</b>
Defendant.	:	<b>September 4, 2024 &amp; October 8, 2024</b>

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To: Assistant Prosecutor, Michael R. Mestern  
 Salem County Prosecutor's Office  
*(Via Electronic Filing)*

PLEASE TAKE NOTICE that on a date and time to be determined by the Court, the undersigned, Richard F. Klineburger, III, Esquire & Matthew V. Portella, Esquire, attorneys for the above captioned Defendant, shall make an application before a Judge of the Superior Court of New Jersey, Salem County, for an Order data retrieved from the Defendant's Airbag Control Module and any information derived therefrom as per *Wong Sun v. United States* 371 U.S. 471 (1963), et al.

The undersigned requests oral argument. Brief to be supplied upon receipt of a Scheduling Order.

Dated: June 9, 2025

/s/ Richard F. Klineburger, III

RICHARD F. KLINEBURGER, III, Esquire  
 KLINEBURGER & NUSSEY

/s/ Matthew V. Portella

MATTHEW V. PORTELLA, Esquire  
 LAW OFFICE OF MATTHEW V. PORTELLA, LLC

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