KLINEBURGER & NUSSEY

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Dated: June 9, 2025

Attorneys for Defendant, Sean Higgins

STATE OF NEW JERSEY, : SU

SUPERIOR COURT OF NEW JERSEY
SALEM COUNTY-CRIMINAL DIVISION

Plaintiff, :

:

v. : INDICTMENT NO.: 24-12-400-I

:

SEAN HIGGINS : **NOTICE OF MOTION TO SUPPRESS**

DEFENDANT'S STATEMENT

Defendant.

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 Suppressing Defendant's Statement pursuant to *Miranda v*. *Arizona*, 384 U.S. 436 (1966), et al. The undersigned requests oral argument. Brief to be supplied upon receipt of a Scheduling Order.

/s/ <u>Richard F. Klineburger, 111</u>

RICHARD F. KLINEBURGER, III, Esquire

KLINEBURGER & NUSSEY

|s| Matthew V. Portella

MATTHEW V. PORTELLA, Esquire

LAW OFFICE OF MATTHEW V. PORTELLA, LLC

Attorneys for Defendant, Sean Higgins