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ATTORNEY FOR DEFENDANT, PAUL CANEIRO

STATE OF NEW JERSEY,	:	SUPERIOR COURT OF NEW JERSEY
	:	MONMOUTH COUNTY COURT
Plaintiff,	:	LAW DIVISION - CRIMINAL
	:	
v.	:	INDICTMENT NO.: 19-02-283-I
	:	PROSECUTOR FILE NO.: 18-4915
PAUL CANEIRO,	:	
	:	NOTICE OF MOTION TO SUPPRESS
Defendant.	:	DVR EVIDENCE SEIZED AND
	:	SEARCHED WITHOUT A WARRANT

TO: AP Chris Decker & AP Nicole Wallace
Monmouth County Prosecutor's Office
132 Jerseyville Avenue
Freehold, NJ 07728

PLEASE TAKE NOTICE that on a date set by the Court, or as soon thereafter as counsel may be heard, Monika Mastellone, Esq., attorney for Defendant, Paul Caneiro, shall move before the Honorable Marc C. Lemieux, A.J.S.C., at the Monmouth County Superior Courthouse, 71 Monument Street, Freehold, New Jersey, for an Order granting suppression of evidence seized without a warrant; specifically, any/ all evidence pertaining to and deriving from the DVR system that was seized and searched without a warrant. The defendant will rely upon oral argument, testimony, and a forthcoming brief pursuant to R. 3:5-7(b) in support of this Motion.

/s/ Monika Mastellone
Monika Mastellone, Esq.
Attorney for Defendant

Dated: May 7, 2025

