

NEW JERSEY CRIME VICTIMS' LAW CENTER
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SPARTA, NEW JERSEY 07871
(201) 729-7337
ATTORNEY FOR VICTIM

STATE OF NEW JERSEY : SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION-CRIMINAL PART
: MORRIS COUNTY
PLAINTIFF :
: INDICTMENT NO. 95-09-01094-I
vs. :
:
:
:
: NOTICE OF MOTION
: OF VICTIM
WILLIAM COBB : FOR PROTECTIVE ORDER
:
DEFENDANT :
:

TO: John Dangler, Prosecutor
County of Morris
Admin. & Records Building
P.O. Box 900
Morristown, N.J. 07963-0900

Alfred V. Gellene, Esq.
272 Franklin Road
Denville, N.J. 07834

SIRS:

PLEASE TAKE NOTICE that on a date and time to be fixed by the Court, the undersigned attorneys for Victim - T.F. will apply to the above named Court before the Honorable B. Theodore Bozonelis, J.S.C., at the Morris County Court House, Washington Street, Morristown, New Jersey for an order or orders as follows:

1. The issuance of a protective order to restrict the defendant's discovery of photographs taken by the defendant of the victim which are in the possession of the State to the right to view said photographs without making copies of same;

2. For a reconsideration of any prior order of the Court granting the defendant the right to receive copies of such photographs; and

3. For such further relief as the Court may deem equitable and just.

PLEASE TAKE FURTHER NOTICE that in support thereof, the undersigned shall rely upon the pleadings filed in this matter, attachments to this Notice of Motion and such further documents which may be filed in support hereof.

NEW JERSEY CRIME VICTIMS'
LAW CENTER
Attorney for Victim, T.F.

Dated: January 23, 1996

By:
RICHARD D. POMPELIO, ESQ.

CERTIFICATION

I hereby certify that the original and one copy of the Notice of Motion with all attachments were forwarded this day by (either "hand delivery" or by "certified mail, return receipt requested") to the Clerk of Morris County and that true copies have been served upon the Honorable B. Theodore Bozonelis, J.S.C., and attorneys for all parties.

NEW JERSEY CRIME VICTIMS'
LAW CENTER
Attorney for Victim

Dated: January 23, 1996

By:
RICHARD D. POMPELIO, ESQ.

