

New Jersey Crime Victims' Law Center  
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Attorneys for the Victim

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<p><b>STATE OF NEW JERSEY</b></p> <p style="text-align: center;"><b>PLAINTIFF</b></p> <p style="text-align: center;">vs.</p> <p><b>DAVID BRECHT</b></p> <p style="text-align: center;"><b>DEFENDANT</b></p>	<p><b>SUPERIOR COURT OF NEW JERSEY CUMBERLAND – LAW DIVISION: CRIMINAL PART</b></p> <p><b>Indictment No. 09-03-00244-I/A</b></p> <p><b>NOTICE OF MOTION FOR PROTECTIVE ORDER AND OPPOSING DEFENDANT’S MOTION FOR AN ORDER COMPELLING THE PROSECUTOR TO PROVIDE COPIES OF NOTES FROM VICTIM COUNSELING SESSIONS</b></p>	
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To: Honorable Robert P. Becker, J.S.C.  
Cumberland County Courthouse  
Broad and Fayette Streets  
Bridgeton, NJ 08302

Assistant Prosecutor Christina E. Foglio, Esq.  
43 Fayette Streets  
Bridgeton, NJ 08302

Alexander Wazeter, Esq.  
525 West Main Street  
Millville, NJ 08332

**SIRS/MADAM:**

**PLEASE TAKE NOTICE**, that on a date to be fixed by the court at 9:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, the undersigned, attorney for the minor victim, M.J. shall apply to the Honorable Robert P. Becker, J.S.C., Superior Court of New Jersey, at the Cumberland County Courthouse, Law Division, Criminal Part, at Broad and Fayette Streets, Bridgeton, NJ 08302 for an Order as follows:

1. Protecting the minor victim from being subjected to unreasonable and invasive requests for discovery that violate the rights of the victim under the United States and State of New Jersey Constitutions and the statutory provisions related thereto.
2. Denying defendant's request for an order compelling the prosecutor to provide notes from victim counseling sessions.
3. For such further relief as the Court deems equitable and just.

**PLEASE TAKE FURTHER NOTICE** that the undersigned will rely upon the Memorandum of Law attached hereto

**PLEASE TAKE FURTHER NOTICE** that the undersigned requests oral argument.

NEW JERSEY CRIME VICTIMS' LAW CENTER.  
Attorneys for Victim, M.J.

By: \_\_\_\_\_  
RICHARD D. POMPELIO, ESQ.

Date: June 11, 2009

**CERTIFICATION**

I hereby certify that the original and one copy of this Notice of Motion with attachments were mailed on this day by overnight mail to the Honorable P Robert P. Becker, J.S.C. and further, a copy of this Notice of Motion with attachments was mailed by overnight mail on this day to all counsel named herein.

NEW JERSEY CRIME VICTIMS' LAW CENTER  
Attorneys for Victim, M.J.

By \_\_\_\_\_  
RICHARD D. POMPELIO, ESQ.

DATE: June 11, 2009