Continuing the development begun in Michigan v. Jackson of ignoring the differences between the Fifth and Sixth Amendment "right to counsel," the Court in Patterson v. Illinois, 478 U.S. 285 (1988), held that Miranda warnings sufficed to warn an indicted suspect of his Sixth Amendment right to counsel and that a waiver following such warnings was a knowing and intelligent waiver of the Sixth Amendment right to counsel as well. The Court noted that it rejected the suggestion that the Sixth Amendment right to counsel is somehow "superior" to Fifth Amendment rights. In a somewhat curious passage, however, the Court stated that such a waiver would not be valid in the Sixth Amendment context, although it would in the Fifth Amendment context, if a suspect is not informed that his lawyer is trying to reach him. The Court cited Moran v. Burbine, 475 U.S. 424 (1986), in support of its view, although the proposition is not easily extracted from that case. When the Court returned to the interaction of and distinctions between the Sixth and Fifth Amendment rights to counsel, the outcome seemed less an obvious application of the preceding precedent and more an expression of frustration with that precedent. In McNeil v. Wisconsin 501 U.S. 171 (1991), the Court considered "whether an accused's invocation of his Sixth Amendment right to counsel during a judicial proceeding constitutes an invocation of his Miranda right to counsel." The answer was "no":