

DISTRICT COURT, BOULDER COUNTY, COLORADO		<p>DATE FILED June 5, 2025 1:42 PM</p> <p>⚠ COURT USE ONLY ⚠</p>
Court Address: 1777 SIXTH STREET P.O. BOX 4249, BOULDER, CO, 80306-4249		
THE PEOPLE OF THE STATE OF COLORADO v. Defendant(s) MOHAMED SABRY SOLIMAN		
		Case Number: 2025CR785 Division: 5 Courtroom:
Order:MR. SOLIMAN'S MOTION FOR PROTECTIVE ORDER (D-006)		

The motion/proposed order attached hereto: SEE ATTACHED ORDER.

The Court regards the Motion as a notice pleading indicating Defendant's invocation of his rights to silence and to the assistance of counsel under the United States and Colorado Constitutions. The People shall inform law enforcement entities that regularly report to them, or that report to them on this case, of Defendant's invocation of these rights.

The Court declines to curtail law enforcement contacts with Mr. Soliman that do not implicate these Constitutional rights.

Issue Date: 6/5/2025



NANCY WOODRUFF SALOMONE
District Court Judge

COUNTY COURT, Boulder County, Colorado Court Address: 1776 6 th Avenue Boulder, CO 80306	
THE PEOPLE OF THE STATE OF COLORADO v. MOHAMED SOLIMAN, Defendant.	
Megan Ring, Colorado State Public Defender Kathryn Herold #40075 Supervising Deputy State Public Defender Nicole Collins #33122 Office Head, Boulder Regional Office Boulder Regional Public Defenders 2555 55TH Street D-200, Boulder, CO 80301 Phone: (303) 444-2322 Fax: (303) 449-6432 E-mail: boulder.defenders@state.co.us	<div style="text-align: center;">□ COURT USE ONLY □</div> Case No. 25CR785 Division 8
MR. SOLIMAN'S MOTION FOR PROTECTIVE ORDER (D-006)	

Mr. Soliman moves this Court for an Order requiring the Office of the District Attorney, any other law enforcement persons, and their agents to (a) get the consent of Soliman's counsel, Deputy State Public Defenders Kathryn Herold and Nicole Collins, before attempting to contact or interview Mr. Soliman and (b) give said counsel reasonable opportunity to be present PRIOR to any contact with Mr. Soliman on the following grounds:

1. The Office of the Public Defender has entered an appearance in Mr. Soliman's case.
2. Mr. Soliman does not wish to be interviewed, contacted or questioned unless his attorney is present. Mr. Soliman wishes all of his contacts with state agents to take place through his legal counsel.
3. Notification and consent of opposing counsel is required by the Colorado Rules of Professional Conduct, Rule 4.2.
4. Mr. Soliman wishes to exercise both his right to silence (and against self-incrimination) and his right to counsel under the federal and state constitution.
5. Mr. Soliman hereby exercises his right to remain silent and privilege against self-incrimination and right to counsel under the Federal and State Constitutions. *People v. Pierson*, 633 P.2d 485 (Colo.App. 1981); *People v. Pierson*, 670 P.2d 770 (Colo. 1983); *People v. Cerezo*, 635 P.2d 1197

(Colo. 1981); *People v. Lowe*, 616 P.2d 118 (Colo. 1980); *People v. Jones*, 677 P.2d 383 (Colo.App. 1983).
See also Edwards v. Arizona, 451 U.S. 477, 101 S.Ct. 1880, 68 L.Ed.2d 378 (1981); *Massiah v. United States*, 377 U.S. 201 (1964); *United States v. Henry*, 447 U.S. 264 (1980); *Maine v. Moulton*, 474 U.S. 159 (1985).

Respectfully Submitted,

MEGAN A. RING
COLORADO STATE PUBLIC DEFENDER

_____/s/Kathryn Herold_____
Kathryn Herold #40075
Supervising Deputy State Public Defender

_____/s/ Nicole Collins
Nicole Collins #33122
Office Head, Boulder Regional Office

Certificate of Service

I hereby certify that on June 2, 2025, I
served the foregoing document by
E filing same to all opposing counsel of
record.

_____/s/ Kathryn Herold ____

Dated: June 2, 2025