

District Court, Weld County, Colorado Court Address: 901 9th Avenue , Greeley, CO 80631	
<b>PEOPLE OF THE STATE OF COLORADO,</b> Plaintiff v. <b>CHRISTOPHER WATTS,</b> Defendant	▲ COURT USE ONLY ▲
James Merson Deputy State Public Defender 822 7th Street, Ste. 300 Greeley, CO 80631 Phone Number: (970) 353-8224 FAX Number: (970) 352-8293 E-mail address: James.Merson@coloradodefenders.us Attorney Registration Number: 36996	Case Number: 18CR2003  Courtroom
<b>MOTION FOR PROTECTIVE ORDER (3)</b>	

Defendant 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 Defendant's counsel, Deputy State Public Defender, before attempting to contact or interview the Defendant and (b) give said counsel reasonable opportunity to be present PRIOR to any contact with the Defendant on the following grounds:

1. The Office of the Public Defender has been appointed to represent the Defendant.
2. The Defendant does not wish to be interviewed, contacted or questioned unless her attorney is present. The Defendant wishes all of her contacts with state agents to take place through her legal counsel.
3. Notification and consent of opposing counsel is required by the Colorado Rules of Professional Conduct, Rule 4.2.
4. Defendant wishes to exercise both her right to silence (and against self-incrimination) and her right to counsel under the federal and state constitution.
5. Defendant hereby exercises her 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).

MEGAN A. RING  
COLORADO STATE PUBLIC DEFENDER



James Merson #36996  
Deputy State Public Defender

**CERTIFICATE OF SERVICE**

I hereby certify that on  
\_8/16/18\_, I served the foregoing document  
by e-service through ICCES to all opposing  
counsel. TC

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