

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

AHMED SARY

Defendant

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CRIMINAL NO. 22-MJ-01286-JMC

**CONSENT MOTION FOR ENTRY OF A PROTECTIVE ORDER
GOVERNING DISCLOSURE OF PERSONAL IDENTITY, FINANCIAL, CONTACT,
GRAND JURY, TAX, COURT, AND INVESTIGATIVE INFORMATION**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States hereby moves for entry by this Court of a protective order that will ensure the confidentiality of Protected Identity, Financial, Contact, Grand Jury, Tax, Court, and Investigative Information (collectively, “Protected Information”), which is or may be included within the evidence in this case.

Entry of a protective order restricting the use, dissemination, and disposition of documents containing Protected Information is essential to permit the United States to provide extensive discovery to the Defendant while protecting the Protected Information of potential victims and other individuals in this case.

The United States and the Defendant have conferred regarding a draft protective order proposed by the United States (the “Proposed Protective Order”) and have reached an agreement with respect to the provisions contained therein.

A copy of the Proposed Protective Order is submitted herewith.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: _____/s/_____
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