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2:14 pm, May 19 2022
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CRIMINAL NO. 22-MJ-01286-JMC**
	*	
AHMED SARY	*	
	*	
Defendant		

SPEEDY TRIAL TOLLING MOTION BY CONSENT AND ORDER

The United States of America by and through undersigned counsel respectfully submits this request for a **CONSENT** Speedy Trial/Indictment tolling order and represents it has consent of Defendant's counsel to file on behalf of parties, and as grounds therefore states:

1. Defendant Ahmed Sary was charged by way of complaint in the above-referenced case. An initial apperance was held on April 29, 2022. A detention hearing was held on May 9, 2022 and Order setting condition of release was entered by Magistrate Judge Brendan A. Hurson. That Order was temporarily stayed by Judge Hurson, at the request of the Government, pending the Government's appeal of the Order, and on May 9, 2022, it was stayed by Judge Deborah L. Boardman at a hearing in connection with that appeal.

2. Defendant's counsel on May 5, 2022 advised Government counsel that Defendant has elected to waive his right to a preliminary hearing in this matter, and Government counsel advised the Court as much on May 9, 2022. Hence, no preliminary hearing in this matter has been scheduled.

3. Moreover, the parties have conferred and respectfully request that the Court enter an Order tolling the Speedy Trial clock for the period from April 29, 2022 to June 28, 2022 and allow the parties to provide a further status report to the Court at that time.

4. Section 3161(b) of the Speedy Trial Act requires that "an information or indictment charging an individual with the commission of an offense shall be filed within thirty

days from the date on which such individual was arrested or served with a summons in connection with such charges." To this point, Defense counsel has advised that Defendant elects to temporarily waive Speedy Trial and consents to tolling for the period from April 29, 2022 to June 28, 2022.

5. Counsel wish to be respectful of resource issues by not immediately scheduling grand jury and requesting a scheduling order. The government will begin the process of providing discovery—which is voluminous—to Defendant's counsel pre-indictment.

6. The parties agree this matter merits a tolling period to allow Defendant's counsel to begin to review discovery and assess this case. Therefore, this motion is being filed by consent, and the parties submit that the interests of justice are served by the requested exclusion of time outweigh the interests of the public and the Defendant in a speedy indictment and trial.

7. The parties further submit that the above factors justify a further tolling period from April 29, 2022 to June 28, 2022. The parties will provide a status report to the Court at that time. The parties respectfully request that the Court ORDER the same.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: _____/s/_____
Paul A Riley
Assistant United States Attorney
36 South Charles St., 4th Floor
Baltimore, MD 21201

The Parties having consented to the relief sought in this Motion and Good Cause Having been Shown, IT is SO ORDERED this 18th **day of May 2022.**

Honorable Matthew J. Maddox
United States Magistrate Judge