IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
v.	*	**Criminal No.: 22-mj-01286-JMC**
AHMED SARY	*	

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CONSENT MOTION FOR ACCESS TO SURRENDERED PASSPORT

The Defendant, Ahmed Sary, by and through counsel, Julie M. Reamy, respectfully moves for an order of this Court authorizing the United States District Court Clerk's Office to access the surrendered passport of his son, Mahmoud Sary, and to provide photocopies of said passport to the Defendant.

1. Mr. Sary was released from detention with conditions in this case on May 13, 2022. See ECF No. 30.
2. On May 9, 2022, Mr. Sary surrendered his U.S. Passport as well as those of his wife and three children. See ECF Nos. 19-23. One of the surrendered passports belongs to Mr. Sary's adult child, Mahmoud Sary.
3. Mamoud Sary wishes to transfer from Salisbury University to Anne Arundel Community College to be closer to his family. In order to enroll and register for classes, he will be required to show proof of his United States citizenship, which will necessitate a copy of his passport. While Mr. Sary is not requesting physical possession of the passport at this time, he may request a temporary return of the passport to present to enrollment officials, if requested.
4. The Defendant, Ahmed Sary, respectfully requests that the Court issue an order authorizing the U.S. District Court Clerk's Office to access Mamoud Sary's surrendered passport and directing that office to photocopy 1) the front page

bearing Mamoud Sary's photograph and personal identifying information 2) the back page bearing the passport's bar code and PPN, and 3) provide the photocopies to the Defendant, Mamoud Sary, or undersigned counsel.

5. For clarification, a similar motion was previously filed and granted regarding Mr. Sary's other son, Mohamed Sary, who needed access to his passport for employment purposes.

6. Undersigned has discussed this request with Assistant U.S. Attorney, Paul Riley, who has advised that the Government is not opposed.

WHEREFORE the Defendant prays that the Court grant his request and issue the attached proposed order.

Respectfully submitted,

/s/ *Julie M. Reamy*
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of August 2022, this document was filed with the Clerk of U.S. District Court and a copy served upon, Assistant United States Attorney, Paul Riley.

/s/ *Julie M. Reamy*
Julie M. Reamy