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 TEMPORARY RELEASE OF 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 temporarily release the surrendered passport of his son, Mahmoud Sary, and states the following in support of his request:

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 children. See ECF Nos. 19-23. One of the surrendered passports belongs to Mr. Sary's adult child, Mahmoud Sary.
3. Mahmoud Sary is attempting to enroll at Anne Arundel Community College. To complete his enrollment Mahmoud Sary must present his passport as proof of United States citizenship to the school's administrative officials.
4. Ahmed Sary respectfully requests that this Court permit the temporary release of Mahmoud Sary's passport for 24 hours so that he may present it to Anne Arundel Community College officials and complete his enrollment.
5. The Defendant, Ahmed Sary, respectfully requests that the Court issue an order authorizing the U.S. District Court Clerk's Office to access Mahmoud Sary's

surrendered passport and directing that office to release it to Mahmoud Sary for a period of 24 hours.

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 17th 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