

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

UNITED STATES OF AMERICA

*

v.

*

Criminal No.: RDB 23-0344

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 adult 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 minor and adult children. See ECF Nos. 19-23. One of the surrendered passports belongs to Mr. Sary's adult child, Mahmoud Sary.
3. Mahmoud Sary wishes to visit his mother in Egypt between approximately April 27, 2024, and May 31, 2024. Mahmoud Sary is not the son of Ahmed Sary's current wife, Izabela Sary.
4. Ahmed Sary respectfully requests that this Court permit the temporary release of Mahmoud Sary's passport so that he may travel to visit his mother. Mahmoud Sary intends to return to the United States on or before May 31, 2024, and would return the passport to the Court no later than June 3, 2024.

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.
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 16th day of April 2024, 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