

**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, Mohamed 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, Mohamed Sary.
3. Mohamed Sary wishes to visit his mother in Egypt between approximately August 15, 2024, and September 15, 2024. Mohamed Sary is not the son of Ahmed Sary's current wife, Izabela Sary, who resides in the United States.
4. Ahmed Sary respectfully requests that this Court permit the temporary release of Mohamed Sary's passport so that he may travel to visit his mother. Mohamed Sary intends to return to the United States on or before September 15, 2024, and would return the passport to the Court no later than September 18, 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 Mohamed Sary's surrendered passport and directing that office to release it to Mohamed 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 13th day of August 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