

**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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MOTION FOR EXTENSION OF TIME FOR VOLUNTARY SURRENDER

Defendant, Ahmed Sary, by and through counsel, Julie M. Reamy, hereby moves for an extension of time for his voluntary surrender to the Bureau of Prisons. Mr. Sary asserts the following in support of his request.

1. On October 18, 2023, Mr. Sary entered a guilty plea to one count of conspiracy to commit wire fraud in violation of 18 U.S.C. §§ 1349 and 1343.
2. On June 25, 2024, Mr. Sary was sentenced to 84 months of imprisonment to be followed by 12 months of home detention and 3 years of supervised release. The Court set a voluntary surrender date of September 25, 2024, pending designation and surrender instructions by the Bureau of Prisons.
3. Mr. Sary has not yet received his designation and reporting instructions from the Bureau of Prisons.
4. Mr. Sary's residence suffered a catastrophic fire in January 2024, which led to the displacement of Mr. Sary and his family, which includes his wife and five children. Three of Mr. Sary's children are under 11 years old. There are remaining structural, electrical, and plumbing repairs, among other things, that must be completed before the house will pass inspection and Mr. Sary's family can return to the home.

5. Mr. Sary seeks an extension of his voluntary surrender date to December 27, 2024, to allow additional time for the necessary repairs to be completed and to move his family back into the home before he begins his sentence.
6. Assistant United States Attorney Paul Riley consents to an extension of 45 days, but objects to any further extension at this time.

WHEREFORE, Mr. Sary respectfully requests that this Court grant his motion and pass an order extending his voluntary surrender date to December 27, 2024.

Respectfully submitted,

/s/ Julie M. Reamy

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of September 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