



U.S. Department of Justice

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September 13, 2023

BY ECF

The Honorable Richard D. Bennett
United States District Judge
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, MD 21201

Re: *United States of America v. Ayaz Qureshi*, Crim. No. RDB-22-0330

Dear Judge Bennett:

I write on behalf of the Government in the above-referenced case to respectfully request that the Court postpone the hearing on Defendant's Motion to Withdraw Guilty Plea, which is currently scheduled for October 4, 2023 at 11:00 am, for a period of six to eight weeks.

Submitted in support of Defendant's Motion to Withdraw was a purported "Competency Evaluation" prepared by a psychologist retained by Defendant, ECF No. 20-1, which makes certain conclusions about Defendant's cognitive abilities. Defense counsel has informed Government counsel that he intends to call the author of the evaluation as a witness at the motion to withdraw hearing.

The Government intends to retain a forensic psychologist to, among other things, assess the evaluation and possibly prepare a report and testify at the hearing. The requested postponement will afford the Government sufficient time to do so. I have conferred with counsel to Defendant concerning a postponement of six to eight weeks. He writes, "So long as you provide me a copy of the report, and his credentials and all requirements per discovery I have no opposition to it."¹

Accordingly, the Government respectfully requests that the Court postpone the hearing currently scheduled for October 4, 2023 for a period of six to eight weeks.

APPROVED: Revised Hearing Date:
November 29, 2023 at 11:00 a.m.

/s/
Richard D. Bennett
U.S. Senior District Judge

Respectfully submitted,

Erek L. Barron
United States Attorney

By: /s/
Paul A. Riley
Assistant United States Attorney

CC: All Counsel (by ECF)

¹ The Government is of course aware of its discovery obligations and will abide by them. But it is not clear at this time whether any expert retained by the Government will be a testifying expert who will generate a report.