IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	
	*	
RYAN E. DALES,	*	**CRIMINAL NO. GLR-23-026**
	*	
Defendant.	*	
	*	
	*******	

GOVERNMENT'S MOTION FOR LEAVE TO FILE SUR-REPLY

The United States of America respectfully submits this Motion for Leave to File Sur-reply in response to Defendant's Reply to Government's Opposition to Defendant's Motion for Reconsideration of Denial of Motion to Suppress (ECF No. 86), and pursuant to Local Rule 105.2, hereby states:

1. On October 16, 2024, Defendant filed a Motion for Reconsideration of the Denial of Defendant's Motion to Suppress (ECF No. 76).

2. On October 21, 2024, after being alerted to an erroneous statement in his filing, Defendant filed a Supplement to his Motion, correcting the misstatement (ECF No. 77).

3. On October 28, 2024, Defendant filed a Motion to Withdraw Argument II in Defendant's Motion for Reconsideration of Denial of Motion to Suppress (ECF No. 83).

4. On October 30, 2024, the Government filed its Opposition to Defendant's Motion to Reconsider (ECF No. 84).

5. On November 5, 2024, Defendant filed his Reply (ECF No. 86) and a Request for Scheduling a Motions Hearing (ECF No. 87).

6. In Defendant's Reply, he raises new arguments for the first time. (*See* Def.'s Reply at 1–3). As such, the Government has not had a meaningful opportunity to respond. The

Government respectfully requests that this Court accept a brief Sur-reply for this purpose, and, pending the granting of this Motion, the Government has attached the Sur-reply here as Exhibit 1.

WHEREFORE, the Government respectfully requests that the Court grant this Motion, accept for filing the Sur-reply, and deny Defendant's Motion for Reconsideration of the Denial of Defendant's Motion to Suppress (ECF No. 76) without a hearing.

Respectfully submitted,

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By: /s/

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