

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
WASHINGTON, DC

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CASE NO. 1:21-CR-109
	§	
TAM DINH PHAM	§	

MOTION TO RETURN PASSPORT

TO THE HONORABLE TIMOTHY J. KELLY, UNITED STATES DISTRICT
JUDGE FOR THE DISTRICT OF COLUMBIA, WASHINGTON, DC DIVISION:

COMES NOW, TAM DINH PHAM, and through his counsel respectfully
moves this Honorable Court to order the release of Mr. Pham's passport.

Mr. Pham turned in his passport to the probation department upon his arrest
for this offense. Mr. Pham has plead guilty, been sentenced, served his sentence,
and now respectfully requests that his passport be released back to him.

Respectfully submitted,

/s/ Nicole DeBorde

NICOLE DEBORDE

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Attorney for Defendant,
TAM DINH PHAM

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CERTIFICATE OF CONFERENCE

I hereby certify that May 6, 2022, I discussed this matter with AUSA Alison Prout and she is unopposed to the return of Mr. Pham's passport.

/s/ Nicole DeBorde
NICOLE DEBORDE

CERTIFICATE OF SERVICE

I hereby certify that May 6, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to all registered parties.

/s/ Nicole DeBorde
NICOLE DEBORDE