

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 22-CR-184 (DLF)
	:	
BARRY BENNET RAMEY	:	
	:	
Defendant.	:	

MOTION FOR LEAVE TO FILE SUR-REPLY

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves this Court for leave to file sur-reply regarding Defendant Barry Bennet Ramey’s Motion to Revoke the Detention Order and for Pretrial Release. (*See* ECF No. 16, 19.) In support of its motion, the government states as follows:

1. On June 15, 2022, this Court ordered the Defendant to file any motion for release from pretrial detention by June 29, 2022, and government to file any response by July 13, 2022. The parties so filed.

2. On July 20, 2022, the defendant filed a reply to the government’s opposition. (ECF No. 19.)

3. The government has obtained new evidence relevant to the defendant’s motion that was not available at the time that the government filed its opposition. The government seeks leave to file a sur-reply to inform the Court and give notice to defense counsel of this new evidence.

4. Whether to allow a sur-reply is within the sound discretion of the district court. *Groobert v. President and Dirs. of Georgetown Coll.*, 219 F. Supp. 2d. 1, 13 (D.D.C. 2002).

5. The government asserts that, without leave to file a sur-reply, the Court will lack information that bears on its decision on the defendant’s motion. The government further asserts

that sur-reply is proper to provide notice to the Court and the defendant of new evidence before any hearing or decision on the defendant's motion.

WHEREFORE, the government requests that the Court grant the government's motion and permit the filing of the sur-reply attached to this motion.

Respectfully submitted,

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