UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, v. RICHARD AYVAZYAN, MARIETTA TERABELIAN, ARTUR AYVAZYAN, TAMARA DADYAN, *Defendants*.	Case No. 20-CR-579 (SVW)

DEFENDANTS' NOTICE OF JOINDER IN RICHARD AYVAZYAN'S RESPONSE TO GOVERNMENT'S *EX PARTE* APPLICATION FOR MODIFIED PROTECTIVE ORDER

I. JOINDER IN RESPONSE

Please take notice that Defendant Artur Ayvazyan and Defendant Tamara Dadyan hereby join in the Response to the Government's *Ex-Parte* Application for Modified Protective Order filed by Defendant Richard Ayvazyan (Dkt. 234).

The government's contention in connection with Ms. Dadyan's actions ultimately falls that in reviewing discovery Ms. Dadyan would then engage in the type of activity that is alleged. Whether the government can make those allegations at trial subject to its obligations under *Napue v. Illinois*, 360 U.S. 264 (1959) remains to be seen, but the Court is not obligated to credit the government's demonstrably flawed theory of the case at this juncture and hamstring Dadyan's ability to prepare for trial.

The Court should not enter essentially the same protective order that the government tried and failed to receive through an earlier *ex parte* application. Putting aside the government's unsupported and wishful thinking, as well as its continued misconduct (including its open defiance and blatant disregard with respect to the Court's discovery order), there are no new circumstances that warrant a change to the existing protective order (as the "discovery" misconduct alleged by the government is a complete fiction). Moreover, the government's overly-restrictive protective order denies the defendants from possessing any discovery and creates an unconstitutional burden that prevents them—particularly under the circumstances of this case—from assisting in their own defense.

Respectfully submitted,

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