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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

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| UNITED STATES OF AMERICA,<br><br>Plaintiff,<br><br>v.<br><br>RICHARD AYVAZYAN,<br>aka “Richard Avazian” and<br>“Iuliia Zhadko,”<br>MARIETTA TERABELIAN,<br>aka “Marietta Abelian” and<br>“Viktoria Kauichko,”<br>ARTUR AYVAZYAN,<br>aka “Arthur Ayvazyan,” and<br>TAMARA DADYAN,<br>MANUK GRIGORYAN,<br>aka “Mike Grigoryan,” and<br>“Anton Kudiumov,”<br>ARMAN HAYRAPETYAN, | No. CR 20-579(A)-SVW<br><br>GOVERNMENT’S REQUEST FOR LEAVE TO FILE A REPLY BRIEF IN SUPPORT OF ITS SECOND *EX PARTE* APPLICATION FOR (1) CONTINUANCE OF TRIAL DATE AND (2) FINDINGS OF EXCLUDABLE TIME PURSUANT TO THE SPEEDY TRIAL ACT<br><br>*GOVERNMENT’S REPLY BRIEF LODGED CONCURRENTLY HEREWITH* |

EDVARD PARONYAN,
aka "Edvard Paronian" and
"Edward Paronyan," and
VAHE DADYAN,

Defendants.

Plaintiff the United States of America, by and through its counsel of record, the United States Attorney for the Central District of California, Assistant United States Attorneys Scott Paetty and Brian Faerstein, and Department of Justice Trial Attorney Christopher Fenton, hereby seeks leave to file the concurrently lodged reply brief in support of its second ex parte application for entry of an order: (1) continuing the trial date in this matter; and (2) excluding time from the Speedy Trial Act calculation for excludable delay.

The government's proposed reply brief is necessary to respond to certain novel arguments raised in the opposition filed by defendants RICHARD AYVAZYAN, MARIETTA TERABELIAN, ARTUR AYVAZYAN, and TAMARA DADYAN, and joined by defendants MANUK GRIGORYAN, EDVARD PARONYAN and VAHE DADYAN, namely, (1) defendants' request that the Court set an April 15, 2021 deadline for the government to disclose its witness and exhibit list, and (2) defendants' argument regarding dismissal under Rule 48(b) of the Federal Rules of Criminal Procedure.

The government's proposed reply brief does not focus on the government's request for a continuance of the trial date or a corresponding exclusion of time under the Speedy Trial Act, as those issues were already addressed in the government's previously-filed ex parte application.

On April 9, 2021, the government emailed counsel for each of the defendants to obtain their respective positions regarding the

government's request for leave to file a reply brief. Counsel for defendant RICHARD AYVAZYAN notified the government of his objection to this request on the grounds that the opposition did not raise issues absent from pre-motion emails with the government. Counsel for defendants MARIETTA TERABELIAN, TAMARA DADYAN, MANUK GRIGORYAN, EDVARD PARONYAN, and VAHE DADYAN also sent emails noting their objection to the government's request.

Dated: April 9, 2021

Respectfully submitted,

TRACY L. WILKISON
Acting United States Attorney

BRANDON D. FOX
Assistant United States Attorney
Chief, Criminal Division

/s/
SCOTT PAETTY
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