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Attorney for Defendant,
ARMAN HAYRAPETYAN

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

CASE NO.: CR 20-579(A)-SVW

vs.

**REQUEST FOR EXTENSION OF BOND
CONDITON**

ARMAN HAYRAPETYAN,
DEFENDANT.

**[PROPOSED ORDER FILED
CONCURRENTLY]**

Arman Hayrapetyan, by and through counsel, hereby files this request for extension for a condition of his release. Specifically, Mr. Hayrapetyan seeks a minimum 30-day extension for the July 30th, 2021 deadline of having surety Evelina Manukuyan replace the affidavit of surety without justification for the amount of \$50,000 with a full deeding of property¹.

This application is based on the attached declaration of counsel.

¹ The property in question is located at 67110 Garbino Road, Cathedral City, CA 92234.

DECLARATION OF COUNSEL

I, Jilbert Tahmazian, do declare and state:

1. I represent Arman Hayrapetyan in this matter. I am licensed to practice in the State of California, admitted to practice before this Court.
2. On June 7th, 2021 Judge Stephen Wilson granted Mr. Hayrapetyan's application for reconsideration of detention. *See* Dkt. No. 444. After submitting the bond documents to criminal intake, Magistrate Judge Paul Abrams signed a release order for Mr. Hayrapetyan on June 8th, 2021.
3. As part of his release, Mr. Hayrapetyan had a surety—Evelina Manukyan—sign an affidavit of surety without justification for the amount of \$50,000 to be replaced with a surety with justification and a full deeding of property.²
4. The abovementioned condition was ordered to be met and posted by June 25th, 2021.
5. Judge Wilson granted an extension for the deadline of having the surety without justification for the amount of \$50,000 to be replaced with a surety with justification and a full deeding of property from June 25th, 2021 to July 30th, 2021 [*See* Dkt. No. 660]
6. However, given the continued impact of the coronavirus on the County recorder's office, it has not been possible to fulfill this obligation in the amount of time afforded to Mr. Hayrapetyan by this court.
7. An appraisal has already been ordered on the home and the accompanying appraisal report will likely be ready in the coming days.

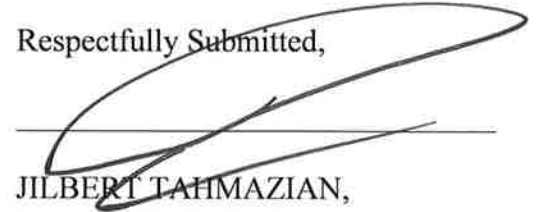
² The property in question is located at 67110 Garbino Road, Cathedral City, CA 92234.

- 1 8. The Court, in its first release order, [*See* Dkt. No. 444; pg. 4] noted—under the “other
- 2 conditions” subsection—that the deadline may be extended with Court order.
- 3 9. Accordingly we respectfully ask that the Court order an extension given the circumstances.
- 4 10. All other conditions would remain unchanged.
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7 Dated: July 27th, 2021

Respectfully Submitted,

8 BY:

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10 JILBERT TAHMAZIAN,
11 Attorney for Defendant
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