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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 October 3rd, 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 his most recent 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 September 3rd, 2021 to October 3rd, 2021 [*See* Dkt. No. 915]
6. Defendant requests additional time to fulfill the obligation required by this Court. Chiefly in order to complete an appraisal on the property which has been subject to delay.
7. The Court, in its first release order, [*See* Dkt. No. 444; pg. 4] noted—under the “other conditions” subsection—that the deadline may be extended with Court order.
8. Accordingly we respectfully ask that the Court order an extension given the circumstances.

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

- 1 9. Defendant has complied with all other conditions and restrictions set out by Pre-Trial
2 Services and this Court. Moreover, Defendant has displayed a steadfast resolve to atone for
3 his conduct.
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5 10. All other conditions would remain unchanged.

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7 Dated: October 3rd, 2021

Respectfully Submitted,

8 BY: _____

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10 JILBERT TAHMAZIAN,
Attorney for Defendant
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