

Ashwin J. Ram (SBN 227513)
aram@steptoe.com
Michael A. Keough (SBN 327037)
mkeough@steptoe.com
Meghan L. Newcomer (*pro hac vice*)
mnewcomer@steptoe.com
Nicholas P. Silverman (*pro hac vice*)
nsilverman@steptoe.com
STEPTOE & JOHNSON LLP
633 West Fifth Street, Suite 1900
Los Angeles, CA 90071
Telephone: (213) 439-9400
Facsimile: (213) 439-9599

Counsel for Defendant Richard Ayvazyan

Fred G. Minassian (SBN 170974)
fgminassian@yahoo.com
**LAW OFFICES OF FRED G.
MINASSIAN, INC.**
101 N. Brand Ave, Suite 1970
Glendale, CA 91203
Telephone: (818) 240-2444

Counsel for Defendant Tamara Dadyan

John L. Littrell (SBN 221601)
jlittrell@bklwlaw.com
Ryan V. Fraser (SBN 272196)
rfraser@bklwlaw.com
**BIENERT KATZMAN LITRELL
WILLIAMS, LLP**
601 W. 5th Street, Suite 720
Los Angeles, CA 90071
Telephone: (213) 528-3400
Facsimile: (949) 369-3701

Counsel for Defendant Marietta Terabelian

Thomas A. Mesereau Jr. (SBN 91182)
mesereau@mesereaulaw.com
MESEREAU LAW GROUP, P.C.
10100 Santa Monica Blvd., Suite 300
Los Angeles, CA 90067
Telephone: (310) 651-9960

Jennifer J. Wirsching (SBN 263141)
wirschinglaw@outlook.com
ATTORNEY AT LAW
1935 Alpha Rd, Suite 216
Glendale, CA 91208
Telephone: (424) 902-9280

Counsel for Defendant Artur Ayvazyan

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZYAN,
MARIETTA TERABELIAN,
ARTUR AYVAZYAN,
TAMARA DADYAN,
et al.,

Defendants.

Case No. 20-cr-579 (SVW)

**APPLICATION FOR LEAVE TO
FILE EXHIBITS TO
DECLARATION OF ASHWIN J.
RAM UNDER SEAL**

Hon. Stephen V. Wilson

Current Hearing Date: June 21, 2021
Requested Hearing Date: June 14, 2021
Time: 11:00 a.m.

1 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:
2 PLEASE TAKE NOTICE that the defendants hereby apply to the Court for an order
3 permitting Exhibits A, B, C, and D to the following document to be filed under seal:

4 **DECLARATION OF ASHWIN J. RAM**
5 **IN SUPPORT OF MOTION TO EXCLUDE DIGITAL DEVICE FILES**

6 The aforementioned exhibits are pleadings that remain under seal upon motion of
7 the government. The defendants therefore apply for the aforementioned exhibits to be
8 filed under seal until such time as the underlying pleadings are unsealed.
9

10 Dated: May 24, 2021

Respectfully submitted,

11 **STEPTOE & JOHNSON LLP**

12 /s/ Ashwin J. Ram

13 Ashwin J. Ram (SBN 227513)

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15 Michael A. Keough (SBN 327037)

16 *mkeough@steptoe.com*

17 Meghan L. Newcomer (*pro hac vice*)

18 *mnewcomer@steptoe.com*

19 Nicholas P. Silverman (*pro hac vice*)

20 *nsilverman@steptoe.com*

21 **STEPTOE & JOHNSON LLP**

22 633 West Fifth Street, Suite 1900

23 Los Angeles, CA 90071

24 Telephone: (213) 439-9400

25 Facsimile: (213) 439-9599

26 *Counsel for Defendant Richard Ayvazyan*

27 [SIGNATURES CONTINUE ON NEXT PAGE]
28

/s/ John L. Littrell

John L. Littrell (SBN 221601)

jlittrell@bklwlaw.com

Ryan V. Fraser (SBN 272196)

rfraser@bklwlaw.com

**BIENERT KATZMAN LITRELL
WILLIAMS, LLP**

601 W. 5th Street, Suite 720

Los Angeles, CA 90071

Telephone: (213) 528-3400

Facsimile: (949) 369-3701

Counsel for Defendant Marietta Terabelian

/s/ Thomas A. Mesereau Jr.

Thomas A. Mesereau Jr. (SBN 91182)

mesereau@mesereaulaw.com

MESEREAU LAW GROUP, P.C.

10100 Santa Monica Blvd., Suite 300

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ATTORNEY AT LAW

1935 Alpha Rd, Suite 216

Glendale, CA 91208

Telephone: (424) 902-9280

Counsel for Defendant Artur Ayvazyan

/s/ Fred G. Minassian

Fred G. Minassian (SBN 170974)

fgminassian@yahoo.com

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101 N. Brand Ave, Suite 1970

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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(i), the filer attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.