

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

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZIAN,
et al.,

Defendants.

Case No. 20-cr-579 (SVW)

**DECLARATION OF ASHWIN J.
RAM IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
GOVERNMENT'S MOTION *IN*
LIMINE #2 TO ADMIT EVIDENCE
INEXTRICABLY INTERTWINED
WITH THE CHARGED OFFENSES**

Judge: Hon. Stephen V. Wilson
Hearing Date: June 14, 2021
Time: 11:00 a.m.

1 I, Ashwin J. Ram, declare as follows:

2 1. I am an attorney licensed to practice law in the state of California. I am a
3 partner at the law firm of Steptoe & Johnson LLP and counsel of record for defendant
4 Richard Ayvazyan in the above-captioned matter.

5 2. Attached as **Exhibit A** is a true and correct copy of the Indictment filed on
6 April 26, 2021 in the matter of *People of the State of California v. Dadyan, et al.*, Case
7 No. BA484293 before the Superior Court of the State of California, Los Angeles
8 County.

9 3. Attached as **Exhibit B** is a true and correct copy of an email from the
10 government to defense counsel dated May 27, 2021.

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed at Los Angeles, California on June 4, 2021.

13 Respectfully submitted,

14 /s/ Ashwin J. Ram

15 Ashwin J. Ram

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17 *Counsel for Defendant Richard Ayvazyan*
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