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Counsel for Defendant Richard Ayvazyan

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZIAN,
MARIETTA TERABELIAN,
et al.

Defendants.

Case No. 20-cr-579 (SVW)

**DECLARATION OF ASHWIN J.
RAM IN SUPPORT OF JOINT
REPLY IN SUPPORT OF MOTION
TO EXCLUDE DIGITAL DEVICE
FILES FROM DEVICES
OBTAINED ON NOVEMBER 5,
2020**

Hon. Stephen V. Wilson

Hearing Date: June 14, 2021
Time: 1:30 p.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 transcript of the
6 Status Conference Hearing held on May 21, 2021 in the above-captioned matter,
7 obtained from the Court Reporter.

8 3. Attached as **Exhibit B** is a true and correct copy of a CART Process
9 Report regarding device 1B17 dated May 27, 2021 and produced by the government on
10 May 29, 2021 as DOJ_PROD_0000164355.

11 4. Attached as **Exhibit C** is a true and correct copy of Examiner Andrew
12 Juang's CART Notes produced by the government on May 29, 2021 as
13 DOJ_PROD_0000163721, with immaterial but potentially sensitive numbers redacted.

14 5. Attached as **Exhibit D** is a true and correct copy of a GrayKey Progress
15 Report for device 1B17 generated January 27, 2021 and produced by the government
16 on May 29, 2021 as DOJ_PROD_0000163719, with immaterial but potentially
17 sensitive numbers redacted.

18 6. Attached as **Exhibit E** is a true and correct copy of Examiner Gregory J.
19 Parra's CART Notes dated January 11, 2021 and produced by the government on May
20 29, 2021 as DOJ_PROD_0000163697, with immaterial but potentially sensitive
21 numbers redacted and children's phone information redacted.

22 7. Attached as **Exhibit F** is a true and correct copy of a GrayKey Progress
23 Report for device 1B81 generated January 27, 2021 and produced by the government
24 on May 29, 2021 as DOJ_PROD_0000163680, with immaterial but potentially
25 sensitive numbers redacted.

26 8. Attached as **Exhibit G** is a true and correct copy of a GrayKey Progress
27 Report for device 1B85 generated January 27, 2021 and produced by the government
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1 on May 29, 2021 as DOJ_PROD_0000163663, with immaterial but potentially
2 sensitive numbers redacted.

3 9. Attached as **Exhibit H** is a true and correct copy of the government's
4 February 1, 2021 letter to defense counsel, with street address numbers redacted.

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

6 Executed at Los Angeles, California on June 7, 2021.

7 Respectfully submitted,

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9 /s/ Ashwin J. Ram

10 Ashwin J. Ram

11 *Counsel for Defendant Richard Ayvazyan*
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