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13 Counsel for Artur Ayvazyan

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,
17 Plaintiff,
18 v.
19 ARTUR AYVAZYAN
20 Defendant.

Case No. 20-CR-00579-SVW

**ARTUR AYVAZYAN'S
MOTION TO CONTINUE THE
DATE FOR SURRENDER TO
THE BUREAU OF PRISONS**

(No Hearing Requested)

21 Artur Ayvazyan, by and through counsel, hereby move this Honorable
22 Court to extend the surrender date of January 3, 2022 to March 5, 2022. On
23 November 15, 2021 Artur Ayvazyan was sentenced to 60 months in prison. The
24 Court ordered a surrender date of January 3, 2022. On December 6, 2021, the
25 Court sentenced Artur Ayvazyan's wife Tamara Dadyan to 130 months in prison.
26 Tamara Dadyan was ordered to surrender on or before January 5, 2021. Artur
27 Ayvazyan requires more time to get his family's affairs in order before his
28 children lose both of their parents for several years. Additionally, Artur
Ayvazyan's oldest daughter, A. Ayvazyan, has had some bloodwork come back

1 with anomalies. Children's Hospital Los Angeles's Children's Center for Cancer
2 and Blood Diseases will be performing bloodwork to determine the cause of the
3 problems. The results are expected on March 3, 2022. AUSA Ahn has advised
4 that the Government opposes this motion.

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6 Dated: December 13, 2021

Respectfully submitted,

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8 /s/ Jennifer J. Wirsching _____
Jennifer J. Wirsching

9 Counsel for Artur Ayvazyan

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DECLARATION OF JENNIFER J. WIRSCHING

1. I, Jennifer J. Wirsching, an attorney licensed to practice law before all the courts of the State of California, the Central District of California, the Eastern District of California, the Northern District of California, the Southern District of California, the District of Colorado, the Ninth Circuit Court of Appeals, the Tenth Circuit Court of Appeals, am one of the attorneys of record for Artur Ayvazyan.
2. Artur Ayvazyan was sentenced to 60 months in the Bureau of Prisons.
3. The Court ordered Ayvazyan to surrender no later than January 3, 2022.
4. Artur Ayvazyan's wife, Tamara Dadyan was sentenced on December 6, 2021 to 130 months' imprisonment.
5. Tamara Dayan has been ordered by the Court to surrender on or before January 5, 2022.
6. Artur Ayvazyan and Tamara Dadyan share two daughters, A. Ayvazyan and N. Ayvazyan.
7. I am informed and believe that Artur Ayvazyan requires more time to settle the family's affairs prior to both parents being imprisoned.
8. I am informed and believe that Artur Ayvazyan's daughter A. Ayvazyan has had irregular blood test results, and that tests will be performed at Children's Hospital Los Angeles to discover the source of the problem.
9. I am informed and believe that the results of this testing will not be available until March 3, 2022.
10. I am informed and believe that Artur Ayvazyan needs to ensure his daughter's health is taken care of prior to surrender.
11. I emailed AUSA Catherine Ahn on December 11, 2021 and advised her of this motion and asked to know if the Government would oppose the motion or not.
12. AUSA Ahn advised me that the Government opposes this request.

1 13. I have personal knowledge of the facts stated above unless stated as
2 made upon information and belief.

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

4 December 13, 2021

/S/Jennifer J. Wirsching

Jennifer J. Wirsching

Attorney for Artur Ayvazyan