

DECLARATION OF MICHAEL G. FREEDMAN

I, Michael G. Freedman, do declare and state:

1. I am counsel for Edvard Paronyan in this matter. I am licensed to practice in the State of California, and admitted to practice before this Court.

2. On March 9, 2021, Mr. Paronyan was charged by the First Superseding indictment in this matter with several counts of conspiracy and wire and bank fraud relating to an alleged scheme to submit fraudulent loan applications seeking COVID-19 relief funds guaranteed by the Small Business Administration (SBA) under the Coronavirus Aid, Relief, and Economic Security (CARES) Act. (Dkt. 154).

3. Mr. Paronyan signed a plea agreement with the government on May 26, 2021 (Dkt. 368), but the Court declined to accept the plea at a change of plea hearing on May 27, 2021 (Dkt. 375). Mr. Paronyan signed a revised plea agreement with the government on June 8, 2021, which the Court accepted on June 11, 2021. (Dkt. 524). Following the change of plea, the Court set a sentencing date for Mr. Paronyan of August 30, 2021 at 11:00 a.m. (*Id.*)

4. By this request, Mr. Paronyan respectfully seeks to continue his sentencing by just under one month to September 27, 2021. The reason for this request is that Mr. Paronyan is responsible for taking care of his two young children throughout the month of August because Mr. Paronyan's wife is away taking care of her mother, who is receiving chemotherapy. Specifically, Mr. Paronyan's mother-in-law suffers from bone marrow cancer and requires a bone marrow transplant, followed by several weeks of chemotherapy in August at City of Hope. Mr. Paronyan's wife is with her mother as the primary caregiver throughout the chemotherapy. Mr. Paronyan's wife cannot leave her mother during the weeks-long chemotherapy session because she would risk bringing in bacteria or the coronavirus, which would severely endanger her mother. For the same reason, no one else can come visit Mr. Paronyan's mother-in-law to relieve his wife. Mr.

DECLARATION OF COUNSEL

1 Paronyan is therefore the only parent at home with his children during August.
2 Given these childcare responsibilities and the strain on his family caused by his
3 mother-in-law's cancer treatment and his wife's absence, Mr. Paronyan cannot
4 devote the time necessary to working with counsel to prepare for sentencing in
5 August. Additionally, assuming Mr. Paronyan were sentenced to time in custody
6 and ordered to surrender immediately following sentencing in August, it could
7 potentially leave his family without a parent available to take care of his children.

8 5. On July 26 and 27, 2021, Assistant United States Attorney Brian Faerstein
9 informed me that the government has no objection to Mr. Paronyan's ex parte
10 request to continue his sentencing to September 27, 2021.

11 I declare under penalty of perjury under the laws of the United States of
12 America that the foregoing is true and correct and that this declaration is executed
13 at Los Angeles, California on July 27, 2021.

14 /s/Michael G. Freedman

15 Michael G. Freedman

16 Counsel for Defendant

17 Edvard Paronyan
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