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9
10 UNITED STATES DISTRICT COURT
11
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 EDVARD PARONYAN,

18 Defendant.

19 **Case No.: 20-CR-579(A)-SVW**

20 ***EX PARTE* APPLICATION TO**
21 **MODIFY CONDITIONS OF**
22 **RELEASE**

23 **[Proposed Order Filed Concurrently]**

24
25 Edvard Paronyan, by and through his counsel of record, Michael G.
26 Freedman, hereby files this *ex parte* application for an Order modifying the
27 conditions of his pretrial release. Specifically, Mr. Paronyan seeks an order that he
28 no longer be subject to location monitoring and an order that he no longer be
subject to curfew so that he may travel overnight in the Central District of
California and the Eastern District of California. This application is based on the
attached Declaration of Michael G. Freedman and the attached Declaration of
Zaven Paronian (the surety for Mr. Paronyan's bond).

Dated: August 10, 2021

Respectfully submitted,

By: /s/ Michael G. Freedman
Michael G. Freedman
Attorney for Defendant
Edvard Paronyan

UNOPPOSED *EX PARTE* APPLICATION