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8 **Attorney for Defendant Edvard Paronyan**

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 EDVARD PARONYAN,

15 Defendant.

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

17 **EX PARTE APPLICATION TO**
18 **MODIFY CONDITIONS OF**
19 **RELEASE RE: TRAVEL TO PALM**
20 **SPRINGS**

21 **[Proposed Order Filed Concurrently]**

22 Edvard Paronyan, by and through his counsel of record, Michael G.
23 Freedman, hereby files this *ex parte* application for an Order modifying the
24 conditions of his pretrial release to allow Mr. Paronyan to travel to Palm Springs
25 from September 3, 2021 to September 6, 2021. This application is based on the
26 attached Declaration of Michael G. Freedman and the attached Declaration of
27 Zaven Paronian (the surety for Mr. Paronyan's bond).

28 Dated: August 31, 2021

Respectfully submitted,

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

EX PARTE APPLICATION