DECLARATION OF ROBERT I. LESTER

I, ROBERT I. LESTER, declare:

1. I am an Assistant United States Attorney, assigned to represent the government in *United States v. Tamara Dadyan*, CR 20-0579-SVW-4. As such, I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. On July 10, 2023, the United States moved for an order forfeiting the bail for defendant Tamara Dadyan and requested the entry of a default judgment against Ms. Dadyan and her three sureties. The government scheduled the hearing on the motion for August 14, 2023. Until August 9, 2023, I had not received any kind of a response to the bail bond forfeiture motion.

3. Then, on August 9, 2023, an attorney who stated that he was just hired to represent the sureties with respect to the bail bond forfeiture motion emailed me, stating that the sureties just realized that counsel for Ms. Dadyan would not be responding to the bond forfeiture motion on their behalf, and therefore the sureties were retaining counsel who needed additional time to respond to the government's motion. I responded that he would agree to a continuance.

4. However, the next day, on August 10, 2023, I received a telephone call from Jerry Kaplan, Esq., who stated that he was replacing the lawyer who had sent me the August 9, 2023, email, and that the sureties were now requesting that the bond forfeiture hearing be continued for 60 days so that they could negotiate a resolution to the bond forfeiture motion with the government. I responded that I would agree to a continuance. I also agreed, as a courtesy, to bring this request to the Court's attention on the new counsel's behalf.

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

Executed on August 11, 2023, at Los Angeles, California.

/s/ *Robert I. Lester*
ROBERT I. LESTER