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8 *Attorneys for Defendant*
9 Mr. Ralph Heredia

10 **UNITED STATES DISTRICT COURT**
11
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
13 **(EASTERN DIVISION)**

14 Joseph Diaz, Jr.,

15 Plaintiff,

16 vs.

17 RALPH HEREDIA, true name RAFAEL
18 HEREDIA TARANGO, a/k/a RAFAEL
19 HEREDIA, a/k/a RAFAEL
20 BUSTAMANTE; JOHN DOE, ESQ.;
and JANE DOES 1 through 20,
21 inclusive,

22 Defendants.

Case No.: 5:20-cv-02332-JWH-KK

**DECLARATION OF CARMINA
LEDESMA IN SUPPORT OF
DEFENDANT'S REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANT'S MOTION TO
COMPEL ARBITRATION AND/OR
STAY THE PROCEEDINGS
PENDING ARBITRATION**

Date: March 12, 2021

Time: 9:00 a.m.

Courtroom: 2

Judge: Hon. John W. Holcomb

23
24
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28
CARMINA LEDESMA DECLARATION ISO DEFENDANTS REPLY TO PLAINTIFF'S
OPPOSITION TO DEFENDANT'S MOTION TO COMPEL ARBITRATION AND / OR STAY
PROCEEDINGS PENDING ARBITRATION

1 I, Carmina Ledesma, hereby declare as follows:

2 1. I, Carmina Ledesma, have personal knowledge of the following facts
3 and, if called as a witness, I could and would testify competently with respect
4 thereto.

5 2. I am an employee of Heredia Boxing Management, Inc.

6 3. I have reviewed the Declaration signed by Mr. Diaz on February 19,
7 2021 wherein Mr. Diaz claims to “never met any employees of ‘Heredia Boxing
8 Management, Inc.’”

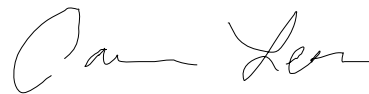
9 4. Mr. Diaz met me in person at the offices of Heredia Boxing
10 Management, Inc. and Global Processing Systems, Inc.

11 5. Based on his interactions with me, I believe he knew I was an
12 employee of Heredia Boxing Management, Inc. Mr. Moses Heredia instructed me
13 to assist Mr. Diaz with his bills. The financial assistance was paid from the Heredia
14 Boxing Management, Inc. account. My understanding was that Mr. Diaz would
15 repay Heredia Boxing Management, Inc. after his next fight. Mr. Diaz and I
16 exchanged text messages concerning his bills.

17 6. Attached hereto as **Exhibit A** is a true and correct copy portion of a
18 text exchange I had with Mr. Diaz. In these text messages, Mr. Diaz provided
19 information concerning bills he requested Heredia Boxing Management, Inc. pay. I
20 recognize these screen captures as they are screen captures from my phone and
21 fairly and accurately depict a portion of the conversation between Mr. Diaz and
22 me.

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct.

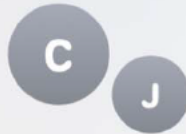
25 Executed February 26, 2020 in Los Angeles, California.

26 

27 Carmina Ledesma
28

EXHIBIT A

11:46
< 119



2 People >

Feb 10, 2020, 12:53 PM

Jojos New Number

Carmina here is all my information for my bills. Thank you!

Rent:

<https://colonyatthelakes.securecafe.com/residentservices/the-colony-at-the-lakes/userlogin.aspx>

Pass:



myAT&T

Your online AT&T bill is ready, JOSEPH.

Hi JOSEPH,

Your monthly wireless bill is now available at myAT&T.

Account number: [REDACTED] 32
Payment due: 02/17/2020
Bill total: \$590.85

User ID: j[REDACTED].com Or, sign in with your wireless number ending in [REDACTED] 8



iMessage



2:34



2 People >



Your new statement contains all your billing information in a simplified, easy-to-read view. Find out more at sce.com/UnderstandYourBill.

Dear Joseph,

Your current bill for SCE customer account number **2-XX-XXX-2183** is available now for viewing with SCE's Online Billing at **My Account**.

[View Your Bill Online](#)

Account Number	Statement Date	Amount Due	Due Date*
2-XX-XXX-2183	02/08/2020	\$ 227.07	02/27/2020

*Your current charges are now due and considered to be past due if not paid by 02/27/2020.

PLEASE NOTE - Your monthly bill may include one or more bill inserts providing notice of actions that may affect your electric rates. Please visit sce.com/notices to check for these important notices.

You have payment options. You get your bill online, and you can pay it there, too. [Pay now through My](#)

Carmina Office

Received , I'll get these paid.
Thank you JoJo!

Feb 11, 2020, 10:48 AM

Jojos New Number

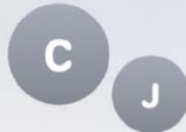
Carmina did you pay the sce bill? My electricity just went off



iMessage



11:49
< 119



2 People >

Tue, Mar 3, 2:27 PM

Jojos New Number

✓ Your payment was successful! A confirmation email has been sent to j[REDACTED]com.

If you would like your rent paid automatically every month, please set up an automatic monthly payment.

You can access payment details anytime from the Payments page.

Payment Details

Print

Confirmation Number:

[REDACTED] 35

Payment Date:

3/3/2020 2:26 PM (PST)

Payment Account:

RALPH HEREDIA Chk *****1300

Payment Amount:

\$2,816.51

Carmina took care of the rent payment already with Ralph, here is the confirmation for you can have saved, also I will be sending you other payments that are due no later than tomorrow thank you

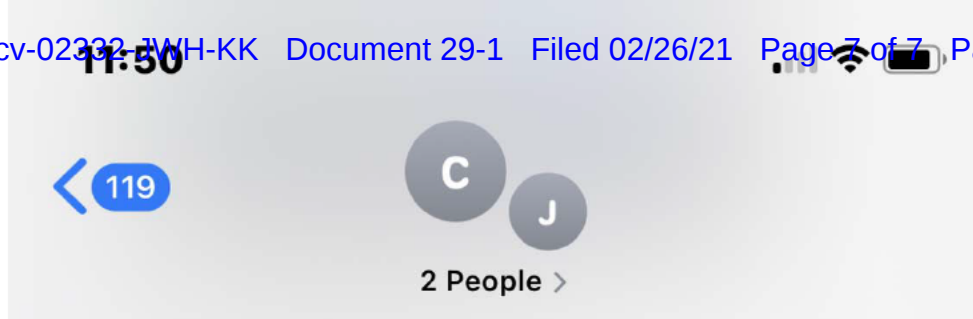
J

Carmina Office



iMessage





Tue, Mar 10, 11:48 AM

Jojos New Number

Thank you can you please
take care of the spectrum bill
as well

Dear JOSEPH DIAZ,

Your most recent Spectrum bill is available online.

To view your statement, pay your bill, or enroll in Auto
Pay, sign in to [Spectrum.net](#) as Head of Household or
Admin.

[Learn more](#) about your billing statement.

Account Information

Account Number:	[REDACTED] 26
Statement Amount:	\$261.16
Payment Due:	03/19/2020

Thank you for choosing Spectrum,

Wed, Mar 18, 10:22 AM

Carmina Office

Spectrum has been paid
\$261.16 confirmation # [REDACTED] 13



iMessage

