


From: Rajan O. Dhungana rajan@saharalegal.com 
Subject: RE: Diaz v. Heredia, et al., Case No. 5:20-cv-02332; service
Date: December 2, 2020 at 11:13 AM
To: Alex Safyan asafyan@vgcllp.com
Cc: Jason Moy jmoy@fedpractice.com, Eric Montalvo emontalvo@fedpractice.com, James Greeley jgreeley@vgcllp.com,
Diyari Vazquez dvazquez@vgcllp.com

RD

Hello Mr. Safyan,

Please see attached.

Rajan O. Dhungana | Attorney
Sahara Legal Group

From: Alex Safyan <asafyan@vgcllp.com>
Sent: Monday, November 30, 2020 2:35 PM
To: Rajan O. Dhungana <rajan@saharalegal.com>
Cc: Jason Moy <jmoy@fedpractice.com>; Eric Montalvo <emontalvo@fedpractice.com>; James Greeley <jgreeley@vgcllp.com>; Diyari Vazquez <dvazquez@vgcllp.com>
Subject: Re: Diaz v. Heredia, et al., Case No. 5:20-cv-02332; service

Mr. Dhungana,

I hope you had a nice Thanksgiving holiday. I'm following up on the below.

Regards,
Alex Safyan

From: Alex Safyan <asafyan@vgcllp.com>
Date: Wednesday, November 18, 2020 at 2:03 PM
To: "Rajan O. Dhungana" <rajan@saharalegal.com>
Cc: Jason Moy <jmoy@fedpractice.com>, Eric Montalvo <emontalvo@fedpractice.com>, James Greeley <jgreeley@vgcllp.com>, Diyari Vazquez <dvazquez@vgcllp.com>
Subject: Re: Diaz v. Heredia, et al., Case No. 5:20-cv-02332; service

Thank you, Mr. Dhungana. Please find the service papers and executed form attached for your signature.

Regards,
Alex Safyan

From: "Rajan O. Dhungana" <rajan@saharalegal.com>
Date: Wednesday, November 18, 2020 at 8:54 AM
To: Alex Safyan <asafyan@vgcllp.com>
Cc: Jason Moy <jmoy@fedpractice.com>, Eric Montalvo <emontalvo@fedpractice.com>

Subject: RE: Diaz v. Heredia, et al., Case No. 5:20-cv-02332; service

Hello Mr. Safyan,

Please be advised that I am local counsel for this matter. I have CC'ed primary counsels Eric Montalvo, and Jason Moy, of the Federal Practice Group in Washington DC.

I am happy to accept service on the client's behalf, via email or postal mail.

rajan@saharalegal.com

Rajan O. Dhungana
Sahara Legal Group
7320 S Rainbow Blvd, STE 102-360
Las Vegas, Nevada 89139

Rajan O. Dhungana | Attorney

Sahara Legal Group

Los Angeles | Las Vegas | Reno | Boulder/Denver

Rajan@SaharaLegal.com

From: Alex Safyan <asafyan@vgcllp.com>

Sent: Monday, November 16, 2020 4:09 PM

To: Rajan O. Dhungana <rajan@saharalegal.com>

Cc: James Greeley <jgreeley@vgcllp.com>; Diyari Vazquez <dvazquez@vgcllp.com>

Subject: Diaz v. Heredia, et al., Case No. 5:20-cv-02332; service

Mr. Dhungana,

As you know, we are counsel to Joseph Diaz, Jr. in the above-referenced matter. We understand that you filed a notice of removal of the complaint we filed in San Bernardino County Superior Court to the U.S. District Court for the Central District of California. You did so prior to us serving the summons and complaint on your client, Mr. Heredia. While this is somewhat unorthodox procedurally, it is also odd as a practical matter insofar as you already have a copy of the service papers (which you filed with your notice of removal) before your client formally received them. Accordingly, though this is a bit of a formality, we write to ask whether you will accept service of the summons and complaint on your client's behalf. As a member of the California State Bar (though your office is in Nevada), I trust you are familiar with the rules governing acceptance of service by counsel who has appeared on behalf of a party in litigation.

Upon confirmation, I will send you an executed Form CV-40 for your review and signature.

Regards,
Alex Safyan

Alexander D. Safyan | Litigation Partner

Alexander R. Safyan | Litigation Partner

t: 424.256.8296 | www.vgcllp.com

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this message in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

NAME, ADDRESS AND TELEPHONE NUMBER OF ATTORNEY(S)
 Alexander R. Safyan (SBN 277856)
 VGC, LLP
 1515 7th Street, No. 106
 Santa Monica, California 90401
 (424) 256-8296

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

JOSEPH DIAZ, JR.

PLAINTIFF(S).

CASE NUMBER

5:20-cv-02332-JWH-KK

v.

RALPH HEREDIA, true name RAFAEL
 HEREDIA TARANGO, a/k/a RAFAEL
 HEREDIA, a/k/a RAFAEL
 BUSTAMANTE; et. al.

DEFENDANT(S).

**PROOF OF SERVICE - ACKNOWLEDGMENT
 OF SERVICE**

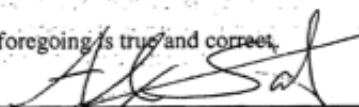
I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, State of California, and not a party to the above-entitled cause. On November 18, 2020, I served a true copy of the Summons, Complaint, and Civil Cover Sheet

by personally delivering it to the person (s) indicated below in the manner as provided in FRCivP 5(b); by depositing it in the United States Mail in a sealed envelope with the postage thereon fully prepaid to the following: (list names and addresses for person(s) served. Attach additional pages if necessary.)

Place of Mailing: Los Angeles, CaliforniaExecuted on November 18, 2020 at Los Angeles, California

Please check one of these boxes if service is made by mail:

- ☒ I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.
☐ I hereby certify that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.
☒ I hereby certify under the penalty of perjury that the foregoing is true and correct.


 Signature of Person Making Service

ACKNOWLEDGEMENT OF SERVICE

Ralph A. Bustamante

11/19/2020

I, MJAN V. DRUYHVA, received a true copy of the within document on 4/7/21.

Signature



Party Served

DEFENDANT

CV-40 (01/00)

PROOF OF SERVICE - ACKNOWLEDGMENT OF SERVICE