

# EXHIBIT D

**Subject:** Re: Request for Arbitration - Heredia/Diaz  
**Date:** Friday, October 2, 2020 at 1:42:39 PM Pacific Daylight Time  
**From:** Alex Safyan  
**To:** CSAC@DCA, Blackstock, Patrisha@DCA, Cornejo, Sophia@DCA  
**CC:** James Greeley  
**Attachments:** 2020-10-2 Diaz response to Heredia arbitration request.pdf, 2020-10-2 Declaration of Joseph Diaz, Jr..pdf, 2020-10-2 Declaration of Alexander R. Safyan.pdf, image001.png, image002.png

Dear Ms. Blackstock:

Please find attached our response on behalf of Mr. Diaz as well as declarations from Mr. Diaz and me in support of the response.

Regards,  
Alex Safyan

Alexander R. Safyan | Litigation Partner



t: 424.256.8296 | [www.vgcllp.com](http://www.vgcllp.com)

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**From:** "Blackstock, Patrisha@DCA" <Patrisha.Blackstock@dca.ca.gov>  
**Date:** Thursday, September 3, 2020 at 10:57 AM  
**To:** Alex Safyan <asafyan@vgcllp.com>, "Cornejo, Sophia@DCA" <Sophia.Cornejo@dca.ca.gov>  
**Cc:** James Greeley <jgreeley@vgcllp.com>  
**Subject:** Re: Request for Arbitration - Heredia/Diaz

Mr. Safyan,

Your request for an extension until end of business day Friday, October 2nd is approved.

Thank you,

Patrisha Blackstock  
Associate Governmental Program Analyst  
California State Athletic Commission

**From:** Alex Safyan <asafyan@vgcllp.com>  
**Sent:** Wednesday, September 2, 2020 4:41 PM  
**To:** Blackstock, Patrisha@DCA <Patrisha.Blackstock@dca.ca.gov>; Cornejo, Sophia@DCA <Sophia.Cornejo@dca.ca.gov>  
**Cc:** James Greeley <jgreeley@vgcllp.com>  
**Subject:** Request for Arbitration - Heredia/Diaz

[EXTERNAL]: asafyan@vgcllp.com

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Dear Ms. Blackstock:

Our firm has been retained by Joseph Diaz, Jr. in connection with the arbitration request by his manager-of-record, Moses Heredia. Mr. Diaz has forwarded us your email to him dated August 24, 2020 containing Mr. Heredia's request for arbitration and declaration. Based on the response deadline set forth in California Code of Regulations section 227, we understand that Mr. Diaz's current deadline to respond to the arbitration request is Sunday, September 13, 2020. We plan to prepare a fulsome response on Mr. Diaz's behalf and look forward to presenting his case at the arbitration. Because we have just been retained and need some additional time to review all the relevant materials and prepare, I write to ask for a modest extension to submit Mr. Diaz's response, from Sunday, September 13, 2020 to Friday, October 2, 2020.

Please let me know if this is acceptable and if there is any other information we need besides the email you sent to Mr. Diaz on August 24, 2020.

Best regards,  
Alex Safyan

Alexander R. Safyan | Litigation Partner



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