

1 James L. Greeley (SBN 218975)  
jgreeley@vgcllp.com  
2 Diyarí Vázquez (SBN 222461)  
dvazquez@vgcllp.com  
3 Alexander R. Safyan (SBN 277856)  
asafyan@vgcllp.com  
4 VGC, LLP  
1515 7th Street, No. 106  
5 Santa Monica, California 90401  
Telephone: (424) 272-9885

6 Attorneys for Plaintiff  
7 JOSEPH DIAZ, JR.

8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **EASTERN DIVISION**  
12

13 JOSEPH DIAZ, JR.,

14 Plaintiff,

15 v.

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

19 Defendants.  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

**DECLARATION OF ALEXANDER  
R. SAFYAN IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT RALPH HEREDIA'S  
MOTION TO DISMISS**

Date: January 8, 2021  
Time: 9:00 a.m.  
Courtroom: 2  
Judge: Hon. John W. Holcomb

1 I, Alexander R. Safyan, hereby declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California  
3 and before this Court. I am a litigation partner at VGC, LLP, counsel of record for  
4 Plaintiff Joseph Diaz, Jr. ("Plaintiff"). I have personal knowledge of the following  
5 facts and, if called as a witness, I could and would testify competently with respect  
6 thereto.

7 2. Defendant Ralph Heredia filed a motion to dismiss Plaintiff's Complaint  
8 on December 9, 2020. (Dkt. 9.) Prior to filing this motion to dismiss (and after),  
9 Defendant Heredia's counsel did not make any attempt to meet and confer with  
10 Plaintiff's counsel as required by Central District Local Rule 7-3.

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

13 Executed December 18, 2020 in Los Angeles, California.

14  
15 

16  
17 \_\_\_\_\_  
Alexander R. Safyan