Rajan O. Dhungana (SBN: 297794) 1 rdhungana@fedpractice.com 2 Eric S. Montalvo (*Pro Hac Vice*) 3 emontalvo@fedpractice.com FEDERAL PRACTICE GROUP 4 1750 K Street, N.W., Suite 900 5 Washington, D.C. 20006 Telephone: (202) 862-4360 6 Fax: (888) 899-6053 7 8 Attorneys for Defendant Mr. Ralph Heredia 9 10 UNITED STATES DISTRICT COURT 11 FOR THE CENTRAL DISTRICT OF CALIFORNIA 12 13 (EASTERN DIVISION) 14 Joseph Diaz, Jr., Case No.: 5:20-cv-02332 JWH (KK) 15 Plaintiff, 16 VS. NOTICE OF ERRATA TO 17 **DEFENDANT'S REPLY TO** RALPH HEREDIA, true name RAFAEL 18 PLAINTIFF'S OPPOSITION TO HEREDIA TARANGO, a/k/a RAFAEL **DEFENDANT'S MOTION TO** 19 HEREDIA, a/k/a RAFAEL COMPEL ARBITRATION AND/OR 20 BUSTAMANTE; JOHN DOE, ESQ.; STAY THE PROCEEDINGS and JANE DOES 1 through 20, PENDING ARBITRATION 21 inclusive, 22 March 12, 2021 Date: Defendants. 23 Time: 9:00am Courtroom: 2 24 Hon. John W. Holcomb Judge: 25 [Corrected Copy of Exhibits A, B, D, 26 and E submitted herewith] 27 28

NOTICE OF ERRATA TO DEFENDANT'S REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO COMPEL ARBITRATION AND/OR STAY THE PROCEEDINGS PENDING ARBITRATION

NOTICE OF ERRATA

Defendant Ralph Heredia, through undersigned counsel, respectfully submits this Notice of Errata to its Reply to Plaintiff's Opposition to Defendant's Motion to Compel Arbitration and/or Stay the Proceedings Pending Arbitration, filed on February 26, 2021, at Docket No. 29 and included 5 declarations Docket No.'s 29-1, 29-2, 29-3, 29-4, and 29-5. Docket No. 29-1 contained one exhibit, **Exhibit A**, 29-2 contained three exhibits, **Exhibits B, D, and E**, that were inadvertently submitted without full redaction.

In **Exhibit A**, in Docket No. 29-1, there exists information that should be redacted, namely a hyperlink that provided some information concerning a personal address, dollar amounts, and the first digit of an account number. This information is personal and does not pertain to the case.

In **Exhibit B**, in Docket No. 29-2, there exists information that should be redacted, namely the bank account, and address of Heredia Boxing Management. Also the signature of Mr. Ralph Heredia. This information is personal and does not pertain to the case.

In **Exhibit D**, in Docket No. 29-2, there exists information that should be redacted, namely, the personal address of Mr. Heredia as well as a hyperlink that may reveal account information. This information is personal and does not pertain to the case.

In **Exhibit E**, in Docket No. 29-2, there exists information that should be redacted, namely, the personal address, phone number, and email of Mr. Heredia. This information is personal and does not pertain to the case.

Defendant respectfully requests that the court consider the attached redacted copies of **Exhibits A, B, D, and E** in place of **Exhibits A, B, D, and E** submitted on February 26, 2021. Defendant is concurrently filing a corrected copy of the above mentioned exhibits that corrects this mistake and makes no other changes.

NOTICE OF ERRATA TO DEFENDANT'S REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO COMPEL ARBITRATION AND/OR STAY THE PROCEEDINGS PENDING ARBITRATION

Dated: March 8, 2021 Respectfully submitted, /s/ Rajan O. Dhungana Rajan O. Dhungana (SBN: 297794) Eric S. Montalvo (Pro Hac Vice) FEDERAL PRACTICE GROUP 1750 K Street, N.W., Suite 900 Washington, D.C. 20006 Telephone: (202) 862-4360 Fax: (888) 899-6053 rdhungana@fedpractice.com emontalvo@fedpractice.com Attorneys for Defendant Ralph Heredia