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7 Attorneys for Plaintiff, DYLAN YEISER-FODNESS

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES**

10 DYLAN YEISER-FODNESS, an individual,

11  
12 Plaintiff,

13 v.

14 MASTER DOG TRAINING, a California  
15 corporation; 5 STAR K-9 ACADEMY,  
16 INC., a California corporation;  
17 EKATERINA KOROTUN, an individual;  
and DOES 1 through 25, inclusive,

18 Defendants.  
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**Case No.: 22STCV21852**

*[Assigned for all purposes to Armen  
Tamzarian, Dept. 52]*

**NOTICE OF ERRATA RE PLAINTIFF'S  
MOTIONS TO COMPEL DISCOVERY  
RESPONSES AND DECLARATIONS OF  
YOUNG W. RYU, ESQ., IN SUPPORT  
THEREOF; DECLARATION OF YOUNG  
W. RYU, ESQ.**

Date: January 19, 2023

Time: 9:00 a.m.

Dept: 52

Complaint Filed: July 6, 2022

Trial Date: None Set

1 **TO THE HONORABLE COURT, ALL PARTIES AND THEIR RESPECTIVE COUNSEL OF**  
2 **RECORD:**

3 Plaintiff Dylan Yeiser-Fodness (“Plaintiff”) respectfully submits this errata to his Motions to  
4 Compel Defendant 5 Star K-9 Academy, Inc., and Ekaterina Korotun to Respond to the First Set of  
5 Plaintiff’s Form Interrogatories—General, Set One, Form Interrogatories —Employment Law, Set One,  
6 Special Interrogatories, Set One, and Requests for Production, Set One, (the “Motions”), and the  
7 Declarations of Young W. Ryu, Esq., (the “Declarations”) in support thereof, all of which were filed on  
8 December 28, 2022. The Motions and Declarations were inadvertently submitted with the following  
9 typographical errors:

10 On page 3 of each respective Motion, the following statement appears: “On August 17, 2022,  
11 Plaintiff properly served the following first sets of written discovery requests upon each of the two  
12 Defendants by e-service to Natalia Foley at Law Offices of Natalia Foley.” The statement should read:  
13 “On August 17, 2022, Plaintiff properly served the following first sets of written discovery requests upon  
14 each of the two Defendants by mail service to 5502 Penfield Ave., Woodland Hills, CA 91364.”

15 Similarly, paragraph 4 of the corresponding Declarations states that “On August 17, 2022,  
16 Plaintiff e-served his first set of written discovery requests . . . .” The statement should read: “On August  
17 17, 2022, Plaintiff served his first set of written discovery requests via U.S. Mail. . . .”

18 No other corrections have been made to the Motions or Declarations.

19  
20 DATED: January 6, 2023

**LOYR, APC**



21  
22  
23 By: \_\_\_\_\_

24 Young W. Ryu, Esq.  
25 Joshua Park, Esq.  
26 Henna H. Choi, Esq.  
27 Attorneys for Plaintiff, DYLAN YEISER-FODNESS

**DECLARATION OF YOUNG W. RYU, ESQ.**

I, Young W. Ryu, declare as follows:

1. I am an attorney duly licensed to practice law in all courts of the State of California and am a senior attorney of LOYR, APC, and attorney of record for Plaintiff Dylan Yeiser-Fodness (“Plaintiff”). I file this declaration in support of the above-captioned Notice of Errata.

2. The following facts are based on my personal knowledge, except those stated upon information and belief, and to all such facts upon information and belief, I am informed and believe that the same are true. If called to testify, I could and would do so competently as follow:

3. On December 28, 2022, Plaintiff filed his Motions to Compel Defendant 5 Star K-9 Academy, Inc., and Ekaterina Korotun to Respond to the First Set of Plaintiff’s Form Interrogatories—General, Set One, Form Interrogatories —Employment Law, Set One, Special Interrogatories, Set One, and Requests for Production, Set One, (the “Motions”), and the Declarations of Young W. Ryu, Esq., (the “Declarations”) in support thereof.

4. The Motions and Declarations were inadvertently submitted with the following typographical errors:

a. On page 3 of each respective Motion, the following statement appears: “On August 17, 2022, Plaintiff properly served the following first sets of written discovery requests upon each of the two Defendants by e-service to Natalia Foley at Law Offices of Natalia Foley.” The statement should read: “On August 17, 2022, Plaintiff properly served the following first sets of written discovery requests upon each of the two Defendants by mail service to 5502 Penfield Ave., Woodland Hills, CA 91364.”

b. Similarly, paragraph 4 of the corresponding Declarations states that “On August 17, 2022, Plaintiff e-served his first set of written discovery requests . . . .” The statement should read: “On August 17, 2022, Plaintiff served his first set of written discovery requests via U.S. Mail. . . .”

5. Attached hereto as **Exhibit A** is a Certified Mail Receipt showing that the above-referenced mail service was accomplished as described.

*[Signature on next page.]*

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DATED: January 6, 2023



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Young W. Ryu, Esq.

# **EXHIBIT A**

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)

**Dylan Nelson Fodor**  
 Certified Mail Fee \$ **4.00**

Extra Services & Fees (check box, add fee as appropriate)  
 Return Receipt (hardcopy) \$  
 Return Receipt (electronic) \$  
 Certified Mail Restricted Delivery \$  
 Adult Signature Required \$  
 Adult Signature Restricted Delivery \$

Postage \$ **9.70**  
 Total Postage and Fees \$ **12.70**

Sent by **Ekaterina Korotkin 90 S Star K-9 Ave**  
 Street, Apt. No., or PO Box  
**S 502 Penfield Ave**  
 City, State, ZIP+4  
**Woodland Hills, CA 91364**

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



7021 0560 0000 2487 1752



CPU WILSHIRE WORLD  
 3010 WILSHIRE BLVD  
 LOS ANGELES, CA 90010-1103  
 (800)275-8777

08/17/2022 04:02 PM

Product	Qty	Unit Price	Price
Priority Mail®	1		\$8.70
Woodland Hills, CA 91364			
Weight: 0 lb 15.50 oz			
Expected Delivery Date			
Fri 08/19/2022			
Certified Mail®			\$4.00
Tracking #:			
70210950000024871752			
Total			\$12.70
Grand Total:			\$12.70

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit [www.usps.com](http://www.usps.com) USPS Tracking or call 1-800-222-1811.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

Preview your Mail  
 Track your Packages  
 Sign up for FREE @  
<https://informedelivery.usps.com>


All sales final on stamps and postage.  
 Thank you for your business.

UFN: 054552-5556  
 Receipt #: 840-29000105-1-9332301-2  
 Clerk: 00

**Track your package**

Data provided by USPS

Tracking number 7021095000024871752

**Delivered** 

September 14, 12:46PM

Woodland Hills, CA

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**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action. My business address is 1055 West 7th Street, Suite 2290, Los Angeles, CA 90017.

On January 6, 2023, I caused the foregoing document(s) described as **NOTICE OF ERRATA RE PLAINTIFF’S MOTIONS TO COMPEL DISCOVERY RESPONSES AND DECLARATIONS OF YOUNG W. RYU, ESQ., IN SUPPORT THEREOF; DECLARATION OF YOUNG W. RYU, ESQ.** to be served on the parties in this action as follows:

Natalia Foley, Esq.  
Law Offices of Natalia Foley  
751 S Weir Canyon Rd Ste 157-455  
Anaheim CA 92808  
Tel 714 948 5054/Fax 310 626 9632  
nfolelaw@gmail.com

Attorney for Defendants

**(VIA U.S. MAIL)**

I enclosed the foregoing document in a sealed envelope to the interest parties at the address listed above and deposited the sealed envelope for collection and mailing following my firm’s ordinary business practices. I am readily familiar with my firm’s business practices for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit.

**(BY ELECTRONIC MAIL)**

I electronically served the foregoing document(s) to the electronic service addresses above pursuant to CCP § 1010.6(a) and I did not receive a Delivery Notice Failure.

**(STATE)**

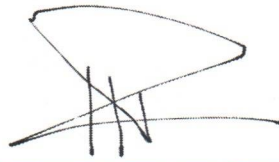
I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 6, 2023, at Los Angeles, California.

*[Signature on next page.]*



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Harley Phleger