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2 Attorney at Law
3 P.O. Box 11256
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6 Attorney for Plaintiff,
7 LAYSION, LLC

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES - UNLIMITED CIVIL JURISDICTION**
10 **NORTH VALLEY DISTRICT (CHATSWORTH COURTHOUSE)**

11 LAYSION, LLC,

12 Plaintiff,

13 v.

14 GUILLERMO MACIAS; COLT
15 INTERNATIONAL CLOTHING INC;
16 COLT LED; DOES 1-20, inclusive

17 Defendants.
18
19
20
21
22
23
24

Case No: 21CHCV00339

Complaint Filed: April 30, 2021
FAC Filed: Aug. 19, 2021

Assigned to Hon. Stephen P. Pfahler, Judge
Dept.: F49

**DECLARATION OF YAJUN ZHANG
IN SUPPORT OF PLAINTIFF
LAYSION, LLC'S MOTION FOR
SUMMARY ADJUDICATION**

DATE: August 1, 2022
TIME: 8:30 am
DEPT: F49

Final Status Conference:
Trial Date: February 6, 2023

Reservation ID: 092334682218

25 TO THE COURT, THE PARTIES AND THEIR ATTORNEYS OF RECORD:

26 NOTICE IS HEREBY GIVEN: The following Declaration of Yajun Zhang is submitted
27
28 in support of plaintiff Laysion LLC's Motion for Summary Adjudication.

1

LAYSION LLC v. GUILLERMO MACIAS, et al.
Declaration of Yajun Zhang in Support of Motion for Summary Adjudication
Case No. 21CHCV00339

Declaration of YAJUN ZHANG

I, YAJUN ZHANG, declare:

I am over the age of eighteen. I am the statutory Manager of plaintiff Laysion, LLC herein. I have personal knowledge of the matters stated herein, and if called as a witness I could and would testify competently thereto under oath. This declaration is given in support of plaintiff's Motion for Summary Adjudication in the above-entitled action now pending before the Court.

The material facts relating to the pending motion are as follows:

In Summary

On or about June 8, 2019, Defendant Guillermo Macias ("Defendant Macias") passed certain checks on insufficient funds to Plaintiff ("the NSF Checks") in violation of Civil Code §1719. Defendants deliberately and knowingly passed the NSF Checks on insufficient funds in exchange for valuable consideration received from Plaintiff, as described below. Defendants passed a total of seven post-dated checks to Plaintiff totaling \$800,000 that were either rejected by Defendants' bank, or Defendants' bank account had insufficient funds on the date written on each NSF Check. All of the NSF checks remain unpaid to date, despite plaintiff's repeated demands upon defendants for payment.

In Detail

1. Mid-2018 – Initial Discussions in China

In mid-2018, Defendant Macias twice met with me at the Laysion Lighting Technology Company factory in Dongguan City, China, together with his associate/interpreter. During these factory visits, Defendant Macias requested and received product samples, which later led to the order of 500 units of the equipment at issue in this action ("the Equipment").

1 2. Late 2018 to Early 2019 – Second Round of Discussions

2 I met Defendant Macias again in China, in about late 2018 - early 2019. At that time and
3 place, Defendant Macias verbally ordered 400 units (later increased to 500 units) of the Equipment.
4 Due to the large number of units ordered, a special order on Defendant Macias' behalf was
5 placed with the manufacturer. The total price agreed to be paid by Defendant Macias for the
6 Equipment was \$1,000,000. That is, 500 units at \$2,000 per unit. The Equipment is described in
7 detail in Exhibit "A" to the FAC.
8

9 Defendants' business name, "COLT LED" was machine-engraved onto each piece of the
10 Equipment, at the special request of Defendant Macias. Defendant Macias verbally promised to
11 pay cash in full for the Equipment upon delivery to Defendant Macias' warehouse in Santa Clarita,
12 California. The Equipment was shipped from China on or about March 30, 2019, and arrived in the
13 Port of Los Angeles on or about April 29, 2019.
14

15 3. April 23, 2019 – Defendant Proposes First Delay of Payment

16 On or about April 23, 2019, Defendant Macias verbally stated to me that he could not pay for the
17 Equipment in full upon delivery, and asked for terms that included two installment payments.
18 Defendant Macias asked me to give him an invoice for the first 200 units of the Equipment for the
19 first installment payment. A true and correct copy of plaintiff's invoice rendered to Defendant
20 Macias dated April 23, 2019, is attached as Exhibit "A" to this Declaration. At that time Defendant
21 Macias verbally stated that the invoice had to be submitted to Bradley Brunon for his approval.
22 Defendant Macias further stated at that time that he did not have the authority to make payment for
23 the Equipment without Bradley Brunon's approval.
24
25

26 4. April 26, 2019 – Defendant Proposes Second Delay of Payment

27 In the afternoon of April 26, 2019, I had a scheduled face to face meeting with Defendant Macias at
28 his office located at 28416 Constellation Rd, Santa Clarita, California. The primary

1 purpose of the meeting was to discuss payment for the Equipment that was scheduled to arrive at
2 the Port of Los Angeles three days later, on April 29, 2019.

3 At said time and place, Defendant Macias stated he could not timely pay the installments as
4 required in the April 23, 2019 Invoice. Defendant Macias further stated he had recently discussed
5 the timing of payment with Bradley Brunon, who had approved a different payment schedule, as
6 follows: The first half due (\$500,000) would be paid on May 19, 2019. The second half due
7 (\$500,000) would be paid on June 19, 2019. Defendant Macias urged me to accept the new
8 payment schedule. Following some discussion, I reluctantly agreed, and verbally stated my
9 acceptance to Defendant Macias as we sat in his office.
10

11 Plaintiff acted in reliance on the abovesaid payment schedule by delivering the Equipment to
12 Defendant Macias prior to receiving any payment. Three weeks later defendants defaulted on the
13 first installment payment, having taken possession of the Equipment and then holding it out for
14 rental to their customers.
15

16
17 5. April 29, 2019 – Equipment Arrives in Los Angeles

18 On or about April 29, 2019, the Equipment arrived at the Port of Los Angeles.
19

20 6. May 3, 2019 – Equipment Delivered to Defendant Macias' Warehouse

21 On or about May 3, 2019, the Equipment was delivered to Defendant Macias' warehouse
22 located at 28416 Constellation Rd, Santa Clarita, California. At said time and place the goods
23 were inspected by plaintiff and Defendant Macias. All of the Equipment was found to be in
24 good condition and accepted into Defendant Macias' inventory without exception.
25

26 ///
27
28

1 7. May 19, 2019 - First Installment Payment Missed

2 On or about May 19, 2019, defendants defaulted on the first installment payment. At that
3 time Defendant Macias informed me he was busy at a convention and did not have time to
4 make payment.

5
6 8. June 8, 2019 – Defendant Proposes Third Delay of Payment; **Passes the NSF Checks**

7
8 On or about June 8, 2019, I met Defendant Macias again, face to face, at his office located
9 at 28416 Constellation Rd, Santa Clarita, California. At said time and place Defendant Macias
10 personally handed me seven post-dated checks in the total amount of \$800,000 (“the NSF
11 Checks”) as partial payment for the Equipment, and stated the balance of \$200,000 would be
12 paid by bank to bank wire transfer. True and correct copies of the NSF Checks are attached
13 hereto as Exhibit “B” and incorporated herein. The NSF Checks are summarized as follows:
14

<u>Date on Check</u>	<u>Check No.</u>	<u>Amount</u>	<u>Bank</u>	<u>Account Name</u>	<u>Payee</u>
7-25-2019	89257	\$ 150,000	B of A	COLT LED	Laysion, LLC
8-25-2019	89256	150,000	B of A	COLT LED	Laysion, LLC
12-31-2019	89251	100,000	B of A	COLT LED	Laysion, LLC
12-31-2019	89252	100,000	B of A	COLT LED	Laysion, LLC
12-31-2019	89253	100,000	B of A	COLT LED	Laysion, LLC
12-31-2019	89254	100,000	B of A	COLT LED	Laysion, LLC
12-31-2019	89255	100,000	B of A	COLT LED	Laysion, LLC
TOTAL		\$ 800,000			

23
24 9. Late September, 2019 - Another Meeting in China

25
26 I met with Defendant Macias again in Shanghai, China, in late September, 2019. At that
27 time, defendants still had not made a single payment for the Equipment and defendants’ first
28

1 two NSF Checks dated July 25, 2019 and August 25, 2019 had already been declined
2 payment by Bank of America due to non-sufficient funds. When I met with Defendant
3 Macias, he stated he was previously aware that two of the NSF Checks had been declined by
4 Bank of America, and assured me all the checks would be paid.

5
6 10. November 2019 - February 2020 – Defendants Make Partial Payments of \$210,000

7 From November, 2019, through February, 2020, a total of \$210,000 was paid for the
8 Equipment via wires and direct deposits to plaintiff's bank account. Said payments were
9 credited to defendants' account, leaving a current principal balance due of \$790,000.

10
11 11. January 20, 2020 – Plaintiff Gives Notice under Civil Code Section §1719

12 On or about January 20, 2020, plaintiff gave written notice under Civil Code §1719 to
13 Defendant Macias regarding the NSF Checks, and requested payment. Defendant Macias
14 acknowledged receipt of plaintiff's letter notice under Civil Code Section §1719, and restated
15 defendants' intention to pay the balance due in full. True and correct copies of Plaintiff's
16 notice under Civil Code Section §1719, and the acknowledgment of receipt thereof by
17 Defendant Macias, are attached hereto as Exhibit "C" and incorporated herein.

18
19 12. February 19, 2021 – Invoice and Demand for Payment

20 On or about February 19, 2021, Plaintiff rendered its final Invoice to Defendants
21 demanding payment of the balance due for the Equipment. A true and correct copy of said
22 Invoice is attached hereto as Exhibit "D" and incorporated herein. To date, Plaintiff has
23 received no objection from Defendants, or any of them, respecting said Invoice. Defendants
24 have acknowledged in writing that said Invoice is correct respecting the balance due. To date,
25 Defendants have failed and refused to pay the NSF Checks, in whole or in part, and there
26
27
28

1 remains a principal balance due, owing and unpaid from Defendants to Plaintiff in the sum of
2 \$790,000.

3 13. April 30, 2021 - Complaint Filed

4 The original Complaint in this action was filed on April 30, 2021, after numerous unsuccessful
5 demands by plaintiff to collect payment on the NSF Checks.
6

7 14. Attached hereto as Exhibit "E" are true and correct excerpted copies from plaintiff's
8 bank account statements showing partial payments received from Defendants for the
9 Equipment, in the total amount of \$210,000. Defendants' wire payments expressly state they
10 are in payment for the Equipment.
11

12 15. Attached hereto as Exhibit "F" are true and correct copies of written correspondence
13 between plaintiff and Defendant Macias during the period of time relevant to this action and to
14 this motion. All of the Exhibits attached to the First Amended Complaint herein are true and
15 correct copies of the originals.
16

17
18 VERIFICATION

19 The undersigned hereby declares under penalty of perjury under the laws of the State of California,
20 that the foregoing is true and correct and that this declaration was executed on
21 May 11, 2022.



22
23 YAJUN ZHANG

Laysion LLC

Add: 28416 Constellation Rd, Santa Clarita, CA 91355
 Tel: 008618665600766
 Web: www.laysion.com

Proforma Invoice

Consignee: Guillermo Macias
Attn.: Guillermo Macias
Tel: 2133213273
E-mail: gmacias@coltled.com
Add: 28416 Constellation Rd, Santa Clarita, CA 91355

Ref.: L2019001
Date: 20190423
Fax:
Zip Code: 91355

This Proforma Invoice is made by and agreed between the buyers and the sellers, in accordance with the terms and conditions stipulated as below:

No	Products Description	Model	QTY [pcs]	CBM	G.W [KGS]	Unit price	Amount
1	Skyflower LED Space Light	LS-SFL70H	200			US\$2,000.00	US\$400,000.00
(Please see the attachment for the detailed list)							
DDP(Delivered duty paid-named place of destination)							
	TOTAL					US\$400,000.00	

SAY US DOLLAR (400,000.00) FOUR HUNDRED THOUSAND DOLLARS ONLY

NOTE:

All bank charges should be Paid by the Buyer

- 1.50% of the payment will be made by buyer within 3 working days upon receipt of Profoma Invoice, and the remaining of 50% need to pay by buyer within 15 working days.
- 2.The product is guaranteed for 18 months warrenty .

5.Payment Method:**1] Bank Information:**

Account Number:325089414965
 ACH Routing Number:121000358
 Title on Account: LAYSION LLC
 Address: 28416 Constellation Rd, Valencia, CA 91355

The Seller:

LAYSION LLC

Add: 28416 Constellation Rd, Santa Clarita, CA 91355
 Tel: 008618665600766
 E-mail: 407135434@qq.com

The Buyer:

COLT LED

Contact: Guillermo Macias

Add: 28416 Constellation Rd, Santa Clarita, CA 91355
 Tel: 2133213273

EXHIBIT “B”
COPIES OF NSF CHECKS
PASSED BY DEFENDANTS

3 Pages

Exhibit 'B' 3 Pages

Colt LED 28416 Constellation RD Santa Clarita, CA 91355 661-775-5998		BANK OF AMERICA, NA Santa Clarita, CA 91350 11-035/1210	89256
			08/25/2019
PAY TO THE ORDER OF <u>Laysion, LLC</u>		\$	**150,000.00
One hundred fifty thousand and 00/100*****		DOLLARS	
Laysion, LLC		18 PROTECTED AGAINST FRAUD	
MEMO		MP	
⑈089256⑈ ⑆121000358⑆ 002194901897⑈			

Colt LED 28416 Constellation RD Santa Clarita, CA 91355 661-775-5998		BANK OF AMERICA, NA Santa Clarita, CA 91350 11-035/1210	89257
			07/25/2019
PAY TO THE ORDER OF <u>Laysion, LLC</u>		\$	**150,000.00
One hundred fifty thousand and 00/100*****		DOLLARS	
Laysion, LLC		18 PROTECTED AGAINST FRAUD	
MEMO		MP	
⑈089257⑈ ⑆121000358⑆ 002194901897⑈			

Colt LED 28416 Constellation RD Santa Clarita, CA 91355 661-775-5998		BANK OF AMERICA, NA Santa Clarita, CA 91350 11-035/1210	89252
			12/31/2019
PAY TO THE ORDER OF <u>Laysion, LLC</u>		\$	**100,000.00
One hundred thousand and 00/100*****		DOLLARS	
Laysion, LLC		18 PROTECTED AGAINST FRAUD	
MEMO		MP	
⑈089252⑈ ⑆121000358⑆ 002194901897⑈			

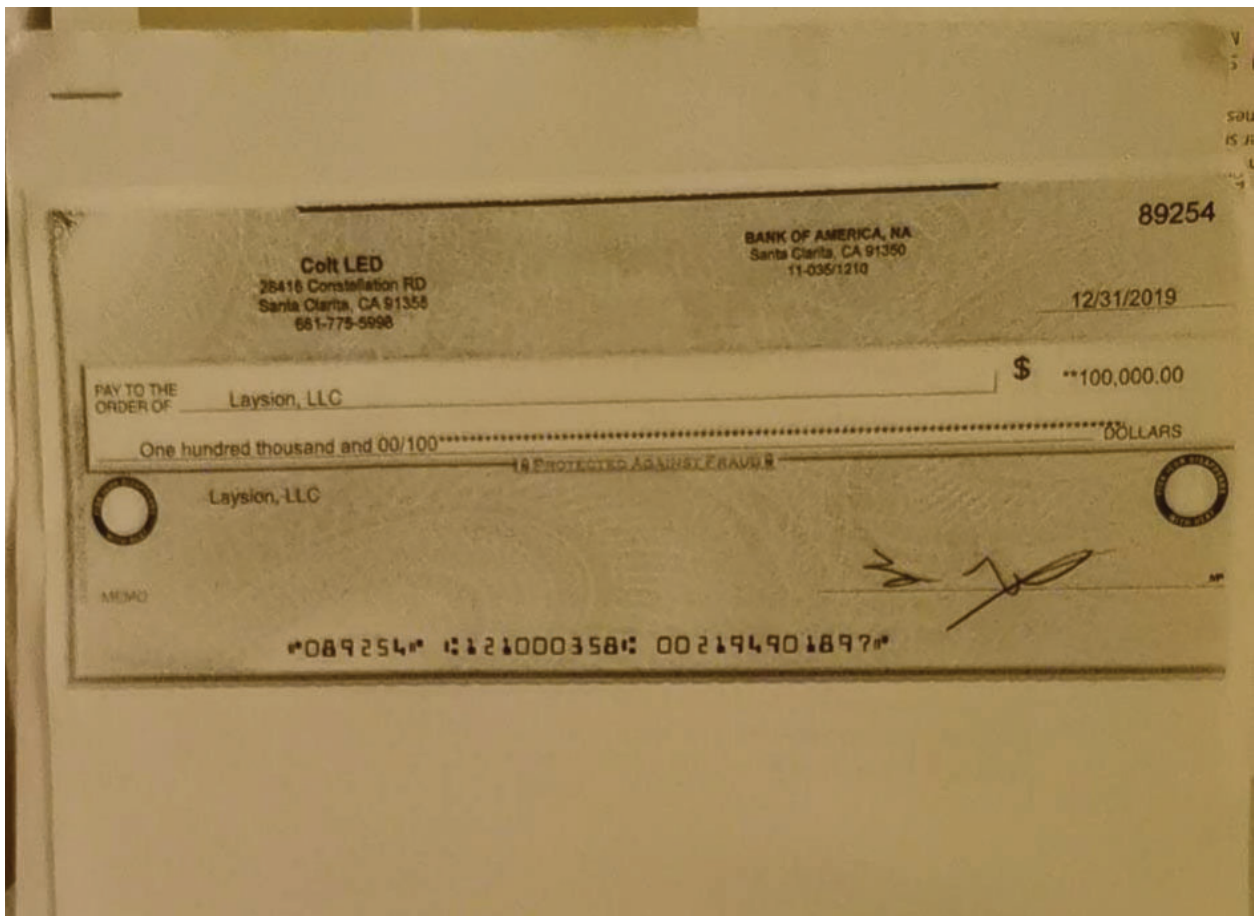


Exhibit "B", Page 2 of 3

89253

Colt LED
28416 Constellation RD
Santa Clarita, CA 91355
661-775-5998

BANK OF AMERICA, NA
Santa Clarita, CA 91350
11-035/1210

12/31/2019

PAY TO THE ORDER OF Laysion, LLC

\$ **100,000.00

One hundred thousand and 00/100

PROTECTED AGAINST FRAUD

Laysion, LLC

MEMO

089253 121000358 002194901897

CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

89251

Colt LED
28416 Constellation RD
Santa Clarita, CA 91355
661-775-5998

BANK OF AMERICA, NA
Santa Clarita, CA 91350
11-035/1210

12/31/2019

PAY TO THE ORDER OF Laysion, LLC

\$ **100,000.00

One hundred thousand and 00/100

PROTECTED AGAINST FRAUD

Laysion, LLC

MEMO

089251 121000358 002194901897

CASH ONLY IF ALL CheckLock™ SECURITY FEATURES LISTED ON BACK INDICATE NO TAMPERING OR COPYING

89255

Colt LED
28416 Constellation RD
Santa Clarita, CA 91355
661-775-5998

BANK OF AMERICA, NA
Santa Clarita, CA 91350
11-035/1210

12/31/2019

PAY TO THE ORDER OF Laysion, LLC

\$ **100,000.00

One hundred thousand and 00/100

PROTECTED AGAINST FRAUD

Laysion, LLC

MEMO

089255 121000358 002194901897

Date: Jan 20, 2020

Duillenno Macias
28416 Constellation
Rd
Valencia, CA, 91355

Dear Duillenno Macias:

The check you wrote for \$150,000.00 and \$150,000.00 dated 07/25/2019 and 08/25/2019, which was made payable to Laysion, LLC, was returned by Bank of America because the account had insufficient funds.

Unless full payment of the check is received by cashier's check **within 30 days** after the date this demand letter was mailed, together with \$35.00 per check for bad checks and \$11.50, the cost of mailing this demand letter by certified mail, I will file a civil division of the superior court claim against you.

The claim will also request damages for the amount of the two checks, \$300,000.00, plus \$3,000.00 damages assessed at three times the amount of the check (calculated by starting with a minimum penalty of \$100 up to a maximum penalty of \$1,500 per check, under California Civil Code section 1719), for a total claim of \$303,000.00 against you.

You may wish to contact a lawyer to discuss your legal rights and responsibilities.

Please send your payment to:

Laysion, LLC
19306 Penrod Terrance
Germantown, MD,

20874 Regards,

YajunZhang
Laysion,
LLC

Re: discount for the five hundred space lights

发件人: gmacias<gmacias@coltied.com>

时 间: 2020年2月26日(星期三) 上午8:48

收件人: Zhang<407135434@qq.com>; alex@cartcd.com<alex@cartcd.com>

Hello Zhang -

Thank you for the letter - my position has not changed since our last email, phone and any and all correspondences.

Considering the fact that we are doing wire ACH transfers to your USA Bank of America account, as requested and directions given by you -

please trash/disregard the checks that were given to you - do not attempt to deposit. - You told me not to pay your account in China, but to wire transfer to your USA BofA - as i have been doing monthly as agreed upon.

I also ask again - we need drivers and LED screen components because they are failing.

Also - all of the FBAP plates (modular 2bank and 4bank modular plates) are breaking - the plastic clip cracks - you cannot put a tube in without the clip cracking - this is a major liability to our customer and if the light falls off and hits someone on the head. - These are terrible quality and are a liability.

EVERYTHING, all of them - they break, even when twisting in as you instructed - the snap/crack with pressure of tube in the clip.

We don't like complaining - we just like good product, this is poor quality and not good business - we just want to fix. Please help fix this? - with good quality clips.

Laysion LLC

Add: 28416 Constellation Rd, Santa Clarita, CA 91355
 Tel: +86-18665600766
 Web: www.laysion.com

Proforma Invoice**Consignee:** Guillermo Macias**Ref.:** L2021001**Attn.:** Guillermo Macias**Date:** 02/19/2021**Tel:** (213)321-3273**Fax:****E-mail:** gmacias@coltled.com**Zip Code:** 91355**Add:** 28416 Constellation Rd, Santa Clarita, CA 91355

This Proforma Invoice is made by and agreed between the buyers and the sellers, in accordance with the terms and conditions stipulated as below:

No	Products Description	Model	QTY [pcs]	CBM	G.W [KGS]	Unit price	Amount
1	Skyflower LED Space Light	LS-SFL70H	500			US\$ 2,000.00	US\$1,000,000.00
(Please see the attachment for the detailed list)							
DDP(Delivered duty paid-named place of destination)							
Amount Paid: US\$ 210,000.00							
	Balance DUE					US\$ 790,000.00	
	Balance DUE Date					March 1st, 2021	

PAY US DOLLAR (790,000.00) SEVEN HUNDRED NINETY THOUSAND DOLLARS

NOTE:

All bank charges should be Paid by the Buyer

1. The balance DUE date is March 1st, 2021;
2. The warranty expires in 18 months from the date the Products are delivered to Buyer.

5.Payment Method:**1) Bank Information:**

Account Number:325089414965
 ACH Routing Number:121000358
 Title on Account: LAYSION LLC
 Address: 28416 Constellation Rd, Valencia, CA 91355

The Seller:

LAYSION LLC

Add: 28416 Constellation Rd, Santa Clarita, CA 91355
 Tel: +86-18665600766
 E-mail: 407135434@qq.com

The Buyer:

COLT LED

Contact: Guillermo Macias

Add: 28416 Constellation Rd, Santa Clarita, CA 91355
 Tel: (213)321-3273

EXHIBIT ‘E’ - BANK STATEMENT EXCERPTS

EXHIBIT ‘E’ - BANK STATEMENT EXCERPTS

LAYSION LLC ! Account # 3250 XXXX XXXX ! November 1, 2019 to November 30, 2019

Your checking account

Page 3 of 4

Deposits and other credits

Date	Description
11/18/19	WIRE TYPE:BOOK IN DATE:191118 TIME:1015 ET TRN:2019111800356443 SNDR REF:280631400 ORIG:COLT INTERNATIONAL CLOTHI ID:002194901897 PMT DET:SPACE PAN PAID
100,000.00	

Total deposits and other credits
\$100,000.00

LAYSION LLC ! Account # 3250 XXXX XXXX ! December 1, 2019 to December 31, 2019

Your checking account

Page 3 of 4

Deposits and other credits

Date	Description
12/20/19	Counter Credit
40,000.00	
12/20/19	Counter Credit
20,000.00	

Total deposits and other credits
\$60,000.00

LAYSION LLC ! Account # 3250 XXXX XXXX ! February 1, 2020 to February 29, 2020

Your checking account

Page 3 of 6

Deposits and other credits

Date	Description	Amou
02/03/20	WIRE TYPE:BOOK IN DATE:200203 TIME:1148 ET TRN:2020020300560745 SNDR REF:288098822 ORIG:COLT INTERNATIONAL CLOTHI ID:002194901897 PMT DET:SPACE PAN PAYMENT	30,000.00
02/11/20	WIRE TYPE:BOOK IN DATE:200211 TIME:1206 ET TRN:2020021100407587 SNDR REF:288869222 ORIG:COLT INTERNATIONAL CLOTHI ID:002194901897 PMT DET:SPACE PAN PAYMENT	20,000.00
Total deposits and other credits		\$50,000.00

EXHIBIT "F"

DOCUMENTATION OF
CORRESPONDENCE AND
AGREEMENT BETWEEN
PLAINTIFF AND DEFENDANTS

23 PAGES

EXHIBIT "F"

F1



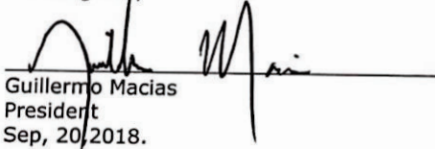
WWW.COLTLED.COM

ATTENTION: Yajun Zhang
RE: Invitation
Date: September 20, 2018

Dear Mr. Zhang,

After visits to your factory twice and purchase of your products for over a year, I personally feel that your factory and your products are excellent. Because of the tariff problem, I hope you (Yajun Zhang) will come to United States to have a deeper cooperation or to investigate the possibility of building a new factory in the United States. I am looking forward to seeing you soon!

Best regards,


Guillermo Macias
President
Sep, 20, 2018.

F2

Re: Fwd: Zhang

发件人: 407135434<407135434@qq.com>
时 间: 2019年7月23日(星期二) 凌晨0:41
收件人: gmacias<gmacias@coltled.com>

Hello, Memo, it almost the end of July. I am going to cash out the first check next Friday as our agreement said. I am wondering whether there is enough money in your account? In addition, Do you know when will Alex give me my first 700,000 RMB? Thank you very much!

---Original---



RE: Fwd: Zhang

发件人: gmacias<gmacias@coltled.com>
时 间: 2019年7月24日(星期三) 上午8:19
收件人: Zhang<407135434@qq.com>

Hello Zhang

How do we reprogram transmitter on Space light ?..This is very important we can not figure out where to reprogram unit to change frequency on transmitter ?!!

Alex is here in USA traveling with family.. Regarding check wait to cash on date. Will discuss with Robert and Alex tomorrow.

Thanks,
Guillermo Macias

28416 Constellation Rd
Valencia, CA 91355
[Cell, 213.321.3273](tel:213.321.3273)
[Office, 661.775.5998](tel:661.775.5998)
[ColtLED](http://ColtLED.com)



hello

发件人: 407135434<407135434@qq.com>
时 间: 2019年8月6日(星期二) 凌晨2:05
收件人: Gmacias<Gmacias@coltled.com>

How did Bradley respond? Why there is no enough money in your bank account? U promised me that I will get the money and RMB at end of July right? But until now, I get nothing. What is going on there? What's the solution for now? I really trusted u, hope you do not cheat on me because this money is really important to me!

F3

Re: Status

发件人: 407135434<407135434@qq.com>
时 间: 2019年08月26日(星期二) 上午10:20
收件人: gmacias<gmacias@coltled.com>

Hello Memo

This is the second month we agreed. According to the agreement, you should give me a total of \$500000 this month. Please keep your promise

---Original---

From: "gmacias"<gmacias@coltled.com>
Date: Tue, Aug 6, 2019 05:50 AM
To: "407135434"<407135434@qq.com>;
Subject: Status

Hello Zhang

We can not talk to our customers like this below. All of the space pan just recently has gone out and is not currently rigged yet; We have pushed our clients to pay and are waiting at the moment. We can not tell Studios they are "Cheats" because of slow payment. Everyone always pays 100% we just need to be patient. And once you get paid in full, you are going to want me to place more orders. You know I always said I do not like to work with this kind of pressure and surprise. Besides everything is going your way due to currency exchange rate USD to RMD.

If everyone was to pay Colt one shot you would have a zero balance. And I would make money also.

How did Bradley respond? Why there is no enough money in your bank account? U promised me that I will get the money and RMB at end of July right? But until now, I get nothing. What is going on there? What's the solution for now? I really trusted u, hope you do not cheat on me because this money is really important to me!

Sincerely,
Guillermo Macias

28416 Constellation Rd
Valencia, CA 91355
[Cell 213-321-3273](tel:213-321-3273)

RE: Status

发件人: gmacias<gmacias@coltled.com>
时 间: 2019年08月27日(星期三) 凌晨1:12
收件人: Zhang<407135434@qq.com>
抄 送: alex@creativemastercorp.com<alex@creativemastercorp.com>

Hello - Sorry, I missed your call - I fell asleep early. Thank you for being patient - we are not going anywhere. We are aware and will get you paid as soon as the studios pay us. It takes a lot of signatures and patience to get money that is owed to us and approvals for these amounts of money. As soon as we transfer money we will contact you immediately. But we are working very hard. We are not going anywhere and business is very very good.

Thanks,
Guillermo Macias

28416 Constellation Rd
Valencia, CA 91355
[Cell 213-321-3273](tel:213-321-3273)
[Office 661-775-5998](tel:661-775-5998)
ColtLED



F4

Re: RE: Status

发件人: 407135434<407135434@qq.com>

时 间: 2019年8月28日(星期二) 凌晨1:01

收件人: gmacias<gmacias@coltled.com>

Hello

I heard from Alex that all these 500 space lights are rented out. It is a very good news! Congratulations! By the way, is there any other companies are willing to buy the space light? If there is, I can give you \$2000 for each and you can set the price to \$3000 in the market.

---Original---

From: "gmacias" <gmacias@coltled.com>
Date: Tue, Aug 27, 2019 01:13 AM
To: "QF002YAJUN" <407135434@qq.com>;
Cc: "CMC-Alex" <alex@creativemastercorp.com>;
Subject: RE: Status

Hello - Sorry, I missed your call - I fell asleep early - Thank you for being patient - we are not going anywhere. We are aware and will get you paid as soon as the studios pay us. It takes a lot of signatures and patience to get money that is owed to us and approvals for these amounts of money. As soon as we transfer money we will contact you immediately. But we are working very hard. We are not going anywhere and business is very very good.

Thanks,
Guillermo Macias

28416 Constellation Rd
Valencia, CA 91355
Cell. [213.321.3273](tel:213.321.3273)
Office. [661.775.5998](tel:661.775.5998)
ColtLED



Re: RE: Status

发件人: 407135434<407135434@qq.com>

时 间: 2019年10月8日(星期二) 凌晨0:01

收件人: gmacias<gmacias@coltled.com>

Dear Memo,

Base on our conversation when we meet in Shanghai last week, I understand why you paid other suppliers' first. I will let my board partners know that you will start to pay us monthly as much as you can from October before 25th. I hope that you can keep your promise to pay 500 sets of space lights totaling 1 million dollars within six months from this month. I wish we can fix the problem little by little from now on and we can do more and more business in the nearly future.

Please put my phone number into your phone so we can communicate by normal phone in the future. My phone number is +86-186 6560 0766.

Thanks
Yajun Zhang

---Original---

From: "gmacias" <gmacias@coltled.com>
Date: Tue, Aug 27, 2019 01:13 AM
To: "QF002YAJUN" <407135434@qq.com>;
Cc: "CMC-Alex" <alex@creativemastercorp.com>;
Subject: RE: Status

Hello - Sorry, I missed your call - I fell asleep early - Thank you for being patient - we are not going anywhere. We are aware and will get you paid as soon as the studios pay us. It takes a lot of signatures and patience to get money that is owed to us and approvals for these amounts of money. As soon as we transfer money we will contact you immediately. But we are working very hard. We are not going anywhere and business is very very good.

Thanks,
Guillermo Macias

F5

Re: Status

发件人: gmacias<gmacias@coltied.com>
时 间: 2019年10月8日(星期二) 凌晨0:42
收件人: Zhang<407135434@qq.com>
抄 送: alex@creativemastercorp.com<alex@creativemastercorp.com>

Hello

Will be In Shanghai again this month see you soon .

Thanks,
Memo

Sent from my iPhone

On Oct 7, 2019, at 9:01 AM, QF YAJUN <407135434@qq.com> wrote:

Dear Memo,

Base on our conversation when we meet in Shanghai last week, I understand why you paid other suppliers' first. I will let my board partners know that you will start to pay us monthly as much as you can from October before 25th. I hope that you can keep your promise to pay 500 sets of space lights totaling 1 million dollars within six months from this month. I wish we can fix the problem little by little from now on and we can do more and more business in the nearly future.

Please put my phone number into your phone so we can communicate by normal phone in the future. My phone number is +86-186 6560 0766.

Thanks
Yajun Zhang

---Original---

Re: Status

发件人: 407135434<407135434@qq.com>
时 间: 2019年10月21日(星期一) 晚上11:45
收件人: gmacias<gmacias@coltied.com>

hello Memo,

It is the 21th of October today. I think now you should know how much you can make a payment to me this month; I hope you can tell me honestly. Thank you!

Yajun Zhang

---Original---

From: "Guillermo Macias"<gmacias@coltied.com>
Date: Tue, Oct 8, 2019 04:26 AM
To: "QF YAJUN"<407135434@qq.com>;
Cc: "alex"<alex@creativemastercorp.com>;
Subject: Re: Status

Zhang as we discussed when I was there if you feel more comfortable picking up all your equipment and holding onto it until you get paid or we sell some of it - That will be a better situation for me. If one of my clients pays me on the 25th or before as we discussed I will give you a payment. Your equipment is new and you can't expect everyone to jump on board just because I have a relationship with them ; lights have to be tested and approved before they start working on any stage -I will be in China before the 25th and even if I'm in China I can arrange a payment..

Sent from my iPhone

On Oct 7, 2019, at 1:17 PM, QF YAJUN <407135434@qq.com> wrote:

Hello,
Last time when we met in Shanghai you told Alex and me that you are going to pay me at least 150,000 dollar starting from this month before 25th. I just want to know that have you scheduled the exact date yet?
Yajun

---Original---

From: "Guillermo Macias"<gmacias@coltied.com>
Date: Tue, Oct 8, 2019 00:42 AM
To: "QF YAJUN"<407135434@qq.com>;
Cc: "alex"<alex@creativemastercorp.com>;
Subject: Re: Status

F6

Re: Status

发件人: 407135434<407135434@qq.com>
时 间: 2019年10月23日(星期三) 凌晨0:34
收件人: gmacias<gmacias@coltled.com>

Please give me an accurate and explainable reply because I have to explain to a lot of people. Thanks!

---Original---

From: "Guillermo Macias"<gmacias@coltled.com>
Date: Tue, Oct 8, 2019 04:26 AM
To: "QF YAJUN"<407135434@qq.com>;
Cc: "alex"<alex@creativemastercorp.com>;
Subject: Re: Status

Zhang as we discussed when I was there if you feel more comfortable picking up all your equipment and holding onto it until you get paid or we sell some of it - That will be a better situation me. If one of my clients pays me on the 25th or before as we discussed I will give you a payment. Your equipment is new and you can't expect everyone to jump on board just because I have relationship with them ; lights have to be tested and approved before they start working on any stage -I will be in China before the 25th and even if I'm in China I can arrange a payment..

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On Oct 7, 2019, at 1:17 PM, QF YAJUN <407135434@qq.com> wrote:

Hello,
Last time when we met in Shanghai you told Alex and me that you are going to pay me at least 150,000 dollar starting from this month before 25th. I just want to know that have you scheduled the exact date yet?
Yajun
---Original---

时 间: 2020年1月16日(星期四) 上午8:35
收件人: Zhang<407135434@qq.com>

張總 您好

下面是Memo的郵件關於租賃的事情，麻煩您看一下，在跟您公司幾位合夥人討論一下，看看是不是先給他個金額，我在幫您跟他談一下！有問題麻煩您在跟我打電話！

感謝您啦~

Alex Su
Creative Master Corp.(YiWu Office)
Room 202,2nd Floor,No.1 Unit,No.41 Building,DongXinWu,JiangDong Street Area,YiWu City, ZheJiang,322000,China
Tel:+86-153-5692-8389

From: gmacias
Date: 2020-01-15 15:27
To: alex@creativemastercorp.com
Subject: Zhang

Hello Alex

It's very simple not complicated at all - What is our cost (ALEX AND MEMO'S COST) PER WEEK \$120.

Billing period would start when lights are rigged (definition= rigged set up on show) once show starts Zhang receive's money every month "*seperate from space pan*" till show is finished with exception of Actor being sick ,vacation, holiday, hiatus etc. A Contract / Rental Agreement will show billing cycle start date and end date with non billable weeks or break for actor this comes from production film crew not me. All this can be rented out ASAP we need Zhang's people to squeeze the trigger and fire away!!

This is how we all keep inventory of whats out on rental and whats sitting in warehouse very simple. My job is to make sure this never is sitting in warehouse and always making money \$\$\$\$\$\$

Thanks,
Guillermo Macias

28416 Constellation Rd
Valencia, CA 91355

F7

firmware update

Ruiz, Rolando - Paramount

隐藏

发件人: Ruiz, Rolando - Paramount
Rolando_Ruiz@Paramount.com

收件人: zhangyajun@laysion.com
zhangyajun@laysion.com

时间: 2021年1月18日(星期一) 晚上11:28

Hi

I need to update Space Light Series of
Skyflower SFL70C. where can I find the latest
firmware?

Thank you

Rolando Ruiz | Electrical Gang Boss| Paramount
Pictures | O: 323.956.5125| M: 323.240.1737 |Email:
Rolando_Ruiz@Paramount.com

翻译

F8

收件人: ruiz, rolando - paramount
rolando_ruiz@paramount.com
时间: 2021年1月21日(星期四) 凌晨0:31

Hello Rolando
How many SFL70C lights do you have?

-----原始邮件-----

发件人: "Ruiz, Rolando - Paramount "
<Rolando_Ruiz@Paramount.com>;
发送时间: 2021年1月18日(星期一) 晚上11:28
收件人: "zhangyajun@laysion.com"
<zhangyajun@laysion.com>;
主题: firmware update

Hi

I need to update Space Light Series of
Skyflower SFL70C. where can I find the latest
firmware?

翻译

F9

RE: 回复:firmware update

Ruiz, Rolando - Paramount

[隐藏](#)

发件人: Ruiz, Rolando - Paramount

Rolando_Ruiz@Paramount.com

收件人: zhangyajun@laysion.com

zhangyajun@laysion.com

时间: 2021年1月21日(星期四) 凌晨0:34

Hi Zhang

We own 200

F10

回复:RE: 回复:firmware update

张亚军

隐藏

发件人: 张亚军

zhangyajun@laysion.com

收件人: ruiz, rolando - paramount

rolando_ruiz@paramount.com

时间: 2021年1月21日(星期四) 凌晨0:51

From ColtLED?

-----原始邮件-----

发件人: "Ruiz, Rolando - Paramount "

<Rolando_Ruiz@Paramount.com>;

发送时间: 2021年1月21日(星期四) 凌晨0:34

收件人: "zhangyajun@laysion.com"

<zhangyajun@laysion.com>;

主题: RE: 回复:firmware update

Hi Zhang

翻译

We own 200

F11

RE: 回复:RE: 回复:firmware update

Ruiz, Rolando - Paramount

隐藏

发件人: Ruiz, Rolando - Paramount

Rolando_Ruiz@Paramount.com

收件人: zhangyajun@laysion.com

zhangyajun@laysion.com

时间: 2021年1月21日(星期四) 凌晨0:53

yes

F12

回复:RE: 回复:RE: 回复:firmware update

张亚军

隐藏

发件人: 张亚军

zhangyajun@laysion.com

收件人: ruiz, rolando - paramount

rolando_ruiz@paramount.com

时间: 2021年1月21日(星期四) 凌晨1:13

Hi Rolando,

Do you have the receipts from ColtLED? If you do please attach it to the attachment. we will deal it as soon as possible.

Thanks!

-----原始邮件-----

发件人: "Ruiz, Rolando - Paramount "

<Rolando_Ruiz@Paramount.com>;

发送时间: 2021年1月21日(星期四) 凌晨0:53

收件人: "zhangyajun@laysion.com"

<zhangyajun@laysion.com>;

主题: RE: 回复:RE: 回复:firmware update

翻译

yes

F13

RE: 回复:RE: 回复:RE: 回复:firmware update

Ruiz, Rolando - Paramount

隐藏

发件人: Ruiz, Rolando - Paramount
Rolando_Ruiz@Paramount.com

收件人: zhangyajun@laysion.com
zhangyajun@laysion.com

时间: 2021年1月21日(星期四) 凌晨2:10

I'm sorry I don't have it. The Accounting department have all the paperwork from the purchased. They are all at home because of COVID-19.

F14

回复:RE: 回复:RE: 回复:RE: 回复:firmware
update

张亚军

隐藏

发件人: 张亚军

zhangyajun@laysion.com

收件人: ruiz, rolando - paramount

rolando_ruiz@paramount.com

时间: 2021年1月21日(星期四) 凌晨2:18

I see. Do you remember when did you buy
SFL70C from ColtLED? and did you pay in full
amount to them?

-----原始邮件-----

发件人: "Ruiz, Rolando - Paramount "

<Rolando_Ruiz@Paramount.com>;

发送时间: 2021年1月21日(星期四) 凌晨2:10

收件人: "zhangyajun@laysion.com"

<zhangyajun@laysion.com>;

主题: RE: 回复:RE: 回复:RE: 回复:firmw
update

翻译

F15

发件人: 张亚军

zhangyajun@laysion.com

收件人: ruiz, rolando - paramount

rolando_ruiz@paramount.com

时间: 2021年1月22日(星期五) 凌晨0:35

Hi Rolando

Since you could not provide the receipts right now because of the COVID-19. Please take 1 photo of all the SFL70C that you have own; A front photo of one single SFL70C light; a back photo of one single SFL70C light.

However, if it is possible, it will be better to show us the receipts. Otherwise, please provide us any evidence to show that you own 200 SFL7C. And then We will arrange engineers to upgrade the firmware for you.

Thanks!



F16

Date: Jan 20, 2020

Duillermo Macias
28416 Constellation Rd
Valencia, CA, 91355

Dear Duillermo Macias:

The check you wrote for \$150,000.00 and \$150,000.00 dated 07/25/2019 and 08/25/2019, which was made payable to Laysion, LLC, was returned by Bank of America because the account had insufficient funds.

Unless full payment of the check is received by cashier's check **within 30 days** after the date this demand letter was mailed, together with \$35.00 per check for bad checks and \$11.50, the cost of mailing this demand letter by certified mail, I will file a civil division of the superior court claim against you.

The claim will also request damages for the amount of the two checks, \$300,000.00, plus \$3,000.00 damages assessed at three times the amount of the check (calculated by starting with a minimum penalty of \$100 up to a maximum penalty of \$1,500 per check, under California Civil Code section 1719), for a total claim of \$303,000.00 against you.

You may wish to contact a lawyer to discuss your legal rights and responsibilities.

Please send your payment to:

Laysion, LLC
19306 Penrod Terrance
Germantown, MD, 20874

Regards,

Yajun Zhang
Laysion, LLC

F17

discount for the five hundred space lights

发件人: 407135434<407135434@qq.com>
时 间: 2020年2月14日(星期五) 晚上10:15
收件人: gmacias@gmacias@coltled.com>

Hey Memo,

Here comes a discount for the five hundred space lights of last year.

If you pay \$350,000 before Feb,25,2020 and pay \$350,000 before March 25, 2020, totally \$700,000, you are done with that 500 hundred space lights payment, which means you get 10% off the original price.

Moreover, if you make the first payment before Feb 25, 2020, we can start the ARRI lights rental in America right away.

Please reply to me before Feb. 17,2020.

Thanks,

Yajun Zhang

Re: discount for the five hundred space lights

发件人: gmacias@gmacias@coltled.com>
时 间: 2020年2月15日(星期六) 凌晨1:43
收件人: Zhang<407135434@qq.com>; alex@cartcd.com<alex@cartcd.com>

Hello Zhang -

Thank you for the email.

And thank you for the generous discount offer, but I cant pay that by requested due dates.

I really want to pay in FULL, believe me - I don't like a balance - this balance will be paid down and is.

You are getting paid exactly what is rented out on rentals and also from my personal (Weekly and Monthly rentals).

As you know, SpacePans are requested in large quantities to fill large stages, and we have lost opportunities to fulfill or not have inventory - we never had a large quantity of inventory to supply big studios to be working at full power with everything out.

I think Alex mentioned this to you. I understand, and I hope you understand too. - At the moment - most people are requesting 350 per stage and then we have to keep 20 in stock for bad or broken or not working spacepans to replace.

I need extra parts - both the driver and LCD screen - they are failing. - We can have the technician here repair it. -

ARRI - I have stopped telling the studios about this deal -I don't want to lie, make up stories and look bad - I thought this was a separate deal from the SpacePans.

I hope you and your family are not being affected by the CoronaVirus?!

Guillermo Macias
28416 Constellation Rd
Valencia, CA 91355
Cell. [213.321.3273](tel:213.321.3273)
Office. [661.775.5998](tel:661.775.5998)
ColtLED



Re: discount for the five hundred space lights

发件人: gmacias@gmacias@coltled.com>
时 间: 2020年2月26日(星期二) 上午8:48
收件人: Zhang<407135434@qq.com>; alex@cartcd.com<alex@cartcd.com>

Hello Zhang -

Thank you for the letter - my position has not changed since our last email, phone and any and all correspondences.

Considering the fact that we are doing wire ACH transfers to your USA Bank of America account, as requested and directions given by you -

please trash/disregard the checks that were given to you - do not attempt to deposit. - You told me not to pay your account in China, but to wire transfer to your USA BofA - as i have been doing monthly as agreed upon.

I also ask again - we need drivers and LED screen components because they are failing.

Also - all of the FBAP plates (modular 2bank and 4bank modular plates) are breaking - the plastic clip cracks - you cannot put a tube in without the clip cracking - this is a major liability to our customer and if the light falls off and hits someone on the head. - These are terrible quality and are a liability.

EVERYTHING, all of them - they break, even when twisting in as you instructed - the snap/crack with pressure of tube in the clip.

We don't like complaining - we just like good product, this is poor quality and not good business - we just want to fix. Please help fix this? - with good quality clips.

F18

Re: discount for the five hundred space lights

发件人: 407135434<407135434@qq.com>
时 间: 2020年3月12日(星期四) 凌晨0:07
收件人: gmacias<gmacias@coltled.com>

Hello Memo

1.The overall price of the 500 space lights is \$1,000,000. Up to date, Laysion only received a total of \$200,000 via ACH transfer. You promised ACH transfer at least \$100,000 to Laysion monthly since October 2019. However, we have not received any payment yet. Maybe you should talk with your accountant to figure out the reason.

For now, your balance due is \$800,000 to Laysion. We are really in a tight budget recently because of the Coronavirus outbreak. It has been over half year since our transaction, please make sure to pay \$300,000 by March 31st, 2020. For the remaining balance of \$500,000, we hope it is no later than May 31st, 2020.

As we agreed, as long as you complete ACH transfer all the \$800,000, we will void all the checks you wrote before.

2. You mention that there are some issues with individual space lights, you can address those to me for (official) testing. If they are proved to be quality issue, we warrant to repair them for free. If they are caused by improper use, we will also help you repair as well, but you need to pay the components fee.

3. We have taught you guys how to install and use FBAP plate clips properly via video instructions, and an extra box of better quality clips were sent to you for free. Wrong installation methods will definitely result in cracking, please follow the installation instruction as careful as you can. Again, if the cracking were proved to be a quality issue, we will replace them for free, otherwise, you need to pay for the new clips.

Re: discount for the five hundred space lights

发件人: gmacias<gmacias@coltled.com>
时 间: 2020年3月12日(星期四) 凌晨2:17
收件人: Zhang<407135434@qq.com>

Hello Zhang - I am trying my best and still continue to pay you.

Nothing has changed - thank you for the communication.

Regarding the BO spacepans - we have them set aside for repairs - Should we mail you 10qty at a time for repairs? Please advise on repair options and shipping options?

Thanks

Guillermo Macias
28416 Constellation Rd
Valencia, CA 91355
Cell.[213.321.3273](tel:213.321.3273)
Office.[661.775.5998](tel:661.775.5998)
ColtLED



F19

(无主题)

发件人: 407135434<407135434@qq.com>

时 间: 2021年1月23日(星期六) 凌晨1:42

收件人: gmacias<gmacias@coltled.com>

Hey Memo,

How is your business go?

It has been a long time since you paid last time. Please arrange a payment to me as soon as possible.

Thanks!

Re: (无主题)

发件人: gmacias<gmacias@coltled.com>

时 间: 2021年1月23日(星期六) 凌晨2:11

收件人: Zhang<407135434@qq.com>; alex@cartcd.com<alex@cartcd.com>

Hello Zhang

Business has been terrible due to Covid 19 ! Everything is shut down hopefully things pick up soon due to Vaccine and we pick up where we left off. Hope you and the family are safe during these terrible times.

Sincerely,

Guillermo Macias

28416 Constellation Rd

Valencia, CA 91355

Cell. [213.321.3273](tel:213.321.3273)

Office. [661.775.5998](tel:661.775.5998)

ColtLED



About the rest of your payment

发件人: 407135434<407135434@qq.com>

时 间: 2021年2月20日(星期六) 上午10:23

收件人: gmacias<gmacias@coltled.com>

Mr. Guillermo Macias,

As we patiently waited for the rest of the payment from ColtLED , we have been in contact with a law office in the LA area.

Would you like our attorneys to touch base and have a quick discussion, before we move forward with a legal resolution to this matter?

I will await your response till the end of the month, Feb 28, before I take it up to the next level with my attorney.

Sincerely,

Yajun Zhang

Laysion LLC

F20

Laysion LLC

Add: 28416 Constellation Rd, Santa Clarita, CA 91355
Tel: +86-18665600766
Web: www.laysion.com

Proforma Invoice

Consignee: Guillermo Macias
Attn.: Guillermo Macias
Tel: (213)321-3273
E-mail: gmacias@coltled.com

Ref: L2021001
Date: 02/19/2021
Fax:
Zip Code: 91355

Add: 28416 Constellation Rd, Santa Clarita, CA 91355

This Proforma Invoice is made by and agreed between the buyers and the sellers, in accordance with the terms and conditions stipulated as below:

No	Products Description	Model	QTY [pcs]	CBM	G.W [KGS]	Unit price	Amount
1	Skyflower LED Space Light	LS-SFL70H	500			US\$ 2,000.00	US\$1,000,000.00
(Please see the attachment for the detailed list)							
DDP(Delivered duty paid-named place of destination)							
Amount Paid: US\$ 210,000.00							
	Balance DUE					US\$ 790,000.00	
	Balance DUE Date					March 1st, 2021	

PAY US DOLLAR (790,000.00) SEVEN HUNDRED NINETY THOUSAND DOLLARS

NOTE:

All bank charges should be Paid by the Buyer

1. The balance DUE date is March 1st, 2021;
2. The warranty expires in 18 months from the date the Products are delivered to Buyer.

5.Payment Method:

1] Bank Information:

Fwd: discount for the five hundred space lights

发件人: gmacias<gmacias@coltled.com>
时 间: 2021年2月21日(星期四) 凌晨2:04
收件人: Zhang<407135434@qq.com>
抄 送: alex<alex@cartcd.com>

Hello Zhang

Hope you and the family are healthy and safe during these crazy times . Thanks for the email you are more than welcome to have you lawyers contact mine anytime.
The shut down of the industry due to COVID was not something the planet was ready for - It affected everyone in business. Is China open 100% ?

See below correspondence ...

From: gmacias coltled.com <gmacias@coltled.com>
Sent: Wednesday, March 11, 2020 11:17 AM
To: QF YAJUN <407135434@qq.com>
Subject: Re: discount for the five hundred space lights

Hello Zhang - I am trying my best and still continue to pay you.
Nothing has changed - thank you for the communication.
Regarding the BO spacepans - we have them set aside for repairs - Should we mail you 10qty at a time for repairs? Please advise on repair options and shipping options?

Thanks

Guillermo Macias
28416 Constellation Rd
Valencia, CA 91355
Cell: 213.321.3273
Office: 661.775.5998
ColtLED<http://coltled.com>

F21

Re: About the rest of your payment

发件人: 407135434<407135434@qq.com>
时 间: 2021年2月27日(星期六) 凌晨4:56
收件人: Zhang<407135434@qq.com>

Hello, Memo, please give me your lawyer's contact information. My lawyer would like to contact with him/her. Thank you very much!

---Original---

From: "Zhang"<407135434@qq.com>
Date: Sat, Feb 20, 2021 10:23 AM
To: "gmacias"<gmacias@coltled.com>;
Subject: About the rest of your payment

Mr. Guillermo Macias,

As we patiently waited for the rest of the payment from ColtLED, we have been in contact with a law office in the LA area.

Would you like our attorneys to touch base and have a quick discussion, before we move forward with a legal resolution to this matter?

I will await your response till the end of the month, Feb 28, before I take it up to the next level with my attorney.

Sincerely,

Yajun Zhang
Laysion LLC

Bradley Brunon ☆

发件人: gmacias <gmacias@coltled.com> 
时 间: 2021年2月27日 (星期六) 上午5:10
收件人: Zhang <407135434@qq.com>
附 件: 1 个 ( Bradley Brunon.vcf)

 邮件可翻译为中文 [立即翻译](#)

Here you go.

Thanks,
Guillermo Macias
[28416 Constellation Rd](#)
[Valencia, CA 91355](#)
Cell. [213.321.3273](#)
Office. [661.775.5998](#)
[ColtLED](#)

 附件(1 个)

普通附件 (🔒 已通过电脑管家云查杀引擎扫描)

F22

Bradley Brunon ☆

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附 件: 1 个 ( Bradley Brunon.vcf)

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Here you go.

Thanks,

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F23

- QUASAR SCIENCE LLC EXHIBIT 1040, Page 41 of 42
QUASAR SCIENCE LLC v. COLT INTERNATIONAL CLOTHING, INC.
IPR2023-00614



Reschedule a Reservation

Reservation
Reservation ID: 092334682218
Reservation Type: Motion for Summary Adjudication
Case Number: 21CHCV00339
Case Title: LAYSION, LLC vs GUILLERMO MACIAS, et al.
Filing Party: LAYSION, LLC (Plaintiff)
Location: Chatsworth Courthouse - Department F49
Date/Time: June 30th 2022, 8:30AM
Status: RESERVED
Number of Motions 1

Motions to Reschedule
Motion for Summary Adjudication
<u>Reschedule To:</u> Date 08/01/2022 8 30 AM Location Chatsworth Courthouse Department F49

Fees			
Description	Fee	Qty	Amount
Reschedule Fee	20.00	1	Chat
edit a dPe ce tage Fee (2 75%)	0 55		