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Superior Court of California,
County of Los Angeles
9/06/2023 3:47 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By V. Sino-Cruz, Deputy Clerk

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

11 WILLIAM JAMES MITCHELL,

12 Plaintiff,

13 v.

14 TWIN GALAXIES, LLC; and Does 1-10,

15 Defendants.

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28
AND RELATED CROSS-ACTION

Case No. 19STCV12592

Assigned to: Hon. Wendy Chang
[Dept. 36]

**DECLARATION OF JACOB
PILKINGTON**

*[Filed concurrently with: (1) Motion to
Compel; (2) Declaration of Laura Carrell; (3)
Declaration of Matthew Gabler; (4)
Declaration of David A. Tashroudian; and (5)
Compendium of Evidence]*

Hearing

Date: September 28, 2023

Time: 8:30 a.m.

Place: Department 36

Reservation ID: Reserved by Court

Action Filed: 4/11/2019

1 **DECLARATION OF JACOB PILKINGTON**

2 I, Jacob Pilkington, declare as follows:

3 1. I am an individual over the age of 18 and I make this declaration based upon facts
4 known to me personally to be true. I am the Operations Manager for the Bridge View Center (the
5 “Center”) in Ottumwa, Iowa. In my capacity as Operations Manager, I am the custodian of records
6 for the Center’s video surveillance camera recordings and I have access to the video surveillance
7 recordings in electronic format from when the recordings are made to when they are overwritten.

8 2. The Center has a vast and modern array of video surveillance cameras that monitor
9 the interior and exterior areas of the Center. The cameras are high quality and record to a digital
10 storage device in the DSS file format. I converted the files to .mp4 file format. All of the cameras
11 record 24 hours a day and write their recording to our digital storage device continuously to ensure
12 continuity of surveillance. All recordings are kept for 30 days and then overwritten.

13 3. On July 7, 2023 I received a litigation hold letter from counsel for Twin Galaxies
14 David Tashroudian requesting that the Center hold and not destroy all CCTV and video camera
15 surveillance footage from June 20, 2023 through June 24, 2023. None of the requested footage
16 had been overwritten as of July 7, 2023.

17 4. On July 20, 2023, I received a correspondence from Mr. Tashroudian narrowing
18 the hold period to June 23, 2023 for Expo Hall A, South Service Entry, and Main Door Exterior.
19 None of the requested footage had been overwritten as of July 20, 2023. I retained a copy of the
20 requested surveillance footage from June 23, 2023 to produce to Mr. Tashroudian.

21 5. On July 24, 2023 I produced the following surveillance camera recordings from the
22 Center (collectively, the “Surveillance Footage”) to Mr. Tashroudian:

23 a. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$0_42.mp4”
24 which is a true and correct copy of the video camera surveillance footage from
25 Expo Hall A at the Center on June 23, 2023 from 12:50:34 to 13:09:15.

26 b. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$0_56.mp4”
27 which is a true and correct copy of the video camera surveillance footage from
28 Expo Hall A at the Center on June 23, 2023 from 17:06:25 to 17:20:43.

- 1 c. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$0_63.mp4”
2 which is a true and correct copy of the video camera surveillance footage from
3 Expo Hall A at the Center on June 23, 2023 from 18:53:29 to 19:11:02.
- 4 d. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$0_66.mp4”
5 which is a true and correct copy of the video camera surveillance footage from
6 Expo Hall A at the Center on June 23, 2023 from 19:44:08 to 19:59:27.
- 7 e. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$0_67.mp4”
8 which is a true and correct copy of the video camera surveillance footage from
9 Expo Hall A at the Center on June 23, 2023 from 19:59:28 to 20:16:26.
- 10 f. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$0_74.mp4”
11 which is a true and correct copy of the video camera surveillance footage from
12 Expo Hall A at the Center on June 23, 2023 from 21:54:08 to 22:13:10.
- 13 g. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$8_3.mp4”
14 which is a true and correct copy of the video camera surveillance footage from
15 South Service Entry at the Center on June 23, 2023 from 11:00:24 to 16:12:05.
- 16 h. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$8_4.mp4”
17 which is a true and correct copy of the video camera surveillance footage from
18 South Service Entry at the Center on June 23, 2023 from 16:12:07 to 21:40:29.
- 19 i. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$31_3.mp4”
20 which is a true and correct copy of the video camera surveillance footage from
21 Main Door Exterior at the Center on June 23, 2023 from 10:43:26 to 16:15:07.
- 22 j. File name “2023-06-23-000000_2023-06-24-000247_1000004\$1\$0\$31_4.mp4”
23 which is a true and correct copy of the video camera surveillance footage from
24 Main Door Exterior at the Center on June 23, 2023 from 16:15:09 to 21:21:09.

25 6. I produced the Surveillance Footage referenced herein to Mr. Tashroudian by
26 uploading the .mp4 video recording files to a shared cloud drive service provided by Google in
27 the folder CCTV/DriveUploader on July 24, 2023.

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PROOF OF SERVICE

Case No. 19STCV12592

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is **TASHROUDIAN LAW GROUP, APC**, located 12400 Ventura Blvd., Suite 300, Studio City, California 91604. On September 5, 2023, I served the herein described document(s):

DECLARATION OF JACOB PILKINGTON

by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Woodland Hills, California addressed as set forth below.

X E-File - by electronically transmitting the document(s) listed above to tony.ellrod@manningkass.com & rwc@robertwcohenlaw.com pursuant to an agreement of the parties.

by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

by overnight courier of the document(s) listed above to the person(s) at the address(es) set forth below.

Anthony J. Ellrod *tony.ellrod@manningkass.com*
MANNING & KASS
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Attorneys for Cross-Defendant
WALTER DAY

I am readily familiar with the firm’s practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. 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 for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 6, 2023 at Woodland Hills, California.



Mona Tashroudian