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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

11 WILLIAM JAMES MITCHELL,
12
13 Plaintiff,

14 v.

15 TWIN GALAXIES, LLC,
16 Defendants.

Case No. 19STCV12592
[The Honorable Wendy Chang, Dept. 36]

DECLARATION OF DAVID L. BISHOP

Action Filed: 4-11-2019

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18 I, David L. Bishop, declare as follows:

19 1. I am an individual of the age of majority. The facts declared herein are known to me
20 personally to be true, and if called to testify to these facts, I could and would do so competently. I
21 make this declaration in support of Plaintiff and Cross-Defendant William “Billy” Mitchell
22 (“Mitchell”) and Cross-Defendant Walter Aldro Day.

23 2. My name is David L. Bishop. I am the former executive vice-president and chief
24 operating officer of NAMCO USA INC. I began working at NAMCO USA as its Director of
25 Operations at its inception on or about September 1, 1990, when NAMCO USA split from Atari
26 Games Corporation. I retired in 2017 as its executive vice-president. I refer hereinafter to NAMCO
27 in Japan as “NAMCO Limited” and NAMCO in the United States as “NAMCO USA.” NAMCO
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1 USA was ultimately a wholly owned subsidiary of NAMCO Limited (today listed as BANDAI
2 NAMCO Holdings Inc.).

3 3. In or about 1999, NAMCO Limited received news of Mitchell's perfect Pac-Man
4 arcade score of 3,333,360 points. As a result, NAMCO Limited invited Mitchell to the Tokyo Game
5 Show in Tokyo, Japan, to recognize Mitchell for his achievements.

6 4. My understanding and communications within all of NAMCO itself was that at the
7 Tokyo Game Show in Tokyo, Japan, on or about September 17, 1999, Masaya Nakamura, on behalf
8 of NAMCO Limited, brought Mitchell on stage to honor him for his first recorded perfect Pac-Man
9 score and called him the "Player of the Century."

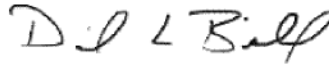
10 5. I met Mitchell and Walter Day in-person in 2010 at the "Big Bang" in Ottumwa,
11 Iowa. I attended the event on behalf of NAMCO Limited and Masaya Nakamura to accept awards
12 given to the original Pac-Man and Masaya Nakamura by the International Video Game Hall of
13 Fame.

14 6. After the "Big Bang" event, I assisted Mitchell in contacting NAMCO Limited and
15 Masaya Nakamura by communicating to NAMCO Limited on his behalf and helped Mitchell obtain
16 the original high-definition photograph of him onstage with Masaya Nakamura at the Tokyo Game
17 Show in Japan on or about September 17, 1999. When Mitchell's name arose internally in all of
18 NAMCO, we described him as the person that achieved the first perfect score on Pac-Man and was
19 brought on stage by Masaya Nakamura and named "Player of the Century."

20 7. In or about 2015, NAMCO USA opened a Pac-Man restaurant and bar in
21 Schaumburg, Illinois, named "Level 257." When NAMCO USA underwent its preparations to open
22 Level 257, NAMCO USA decided to bring Mitchell to the venue for the purpose of marketing the
23 new restaurant and bar and pushing the Pac-Man brand to a higher level. Moreover, in the museum
24 at Level 257, NAMCO USA featured the below framed picture and words:



I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this August 16, 2023, in Chicago, Illinois.

DocuSigned by:

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David L. Bishop

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 801 S. Figueroa St, 15th Floor, Los Angeles, CA 90017-3012.

On September 14, 2023, I served true copies of the following document(s) described as **DECLARATION OF DAVID BISHOP** on the interested parties in this action as follows:

David Tashroudian, Esq. Mona Tashroudian, Esq. TASHROUDIAN LAW GROUP, APC 12400 Ventura Blvd. Suite 300 Studio City, CA 91604 Telephone: (818) 561-7381 Facsimile: (818) 561-7381 Email: david@tashlawgroup.com Email: mona@tashlawgroup.com <i>Attorney for Defendants, TWIN GALAXIES</i>	Robert W. Cohen, Esq. Law Offices of Robert W. Cohen 1901 Avenue of The Stars, Suite 1910 Los Angeles, CA 90067 Telephone: (310) 282-7586 Email: rwcohenlaw.com <i>Attorneys for Cross-Defendant, WALTER DAY</i>
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BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address rhea.mercado@manningkass.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on September 14, 2023, at Los Angeles, California.


Rhea Mercado