

1 David A. Tashroudian [SBN 266718]
2 Mona Tashroudian [SBN 272387]
3 TASHROUDIAN LAW GROUP, APC
4 12400 Ventura Blvd., Suite 300
5 Studio City, California 91604
6 Telephone: (818) 561-7381
7 Facsimile: (818) 561-7381
8 Email: david@tashlawgroup.com
9 mona@tashlawgroup.com

10 Attorneys for Twin Galaxies, LLC

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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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AND RELATED CROSS-ACTION

Case No. 19STCV12592

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

**NOTICE OF LODGMENT IN SUPPORT
OF MOTION FOR ISSUE SANCTIONS**

[CRC, RULE 2.551]

Hearing

Date: November 28, 2023

Time: 8:30 a.m.

Place: Department 36

Reservation ID: 858911525963

Action Filed: 4/11/2019

1 **NOTICE OF LODGMENT**

2 **TO THE PLAINTIFF, THE HONORABLE COURT, AND TO ALL ATTORNEYS**
3 **OF RECORD:**

4 PLEASE TAKE NOTICE that on November 1, 2023 defendant and cross-complainant
5 Twin Galaxies, LLC (“Defendant”) lodged with the Clerk in Department 36 of this Court, the
6 Declaration of David A. Tashroudian filed in support of Defendant’s Motion for Issue Sanctions
7 against plaintiff and cross-defendant William James Mitchell (“Plaintiff”) which contained the
8 following unredacted exhibits that were marked confidential and produced by Plaintiff in this
9 matter pursuant to the parties’ stipulated protective order:

10 (1) Exhibit G - a nine page account statement for Rickey’s World Famous Hot Sauce from
11 a Wells Fargo Business Choice Checking account for the period of March 1, 2018
12 through March 31, 2018 marked with Bates stamp numbers MITCHELL 007066-
13 007074 (the “First March 2018 Bank Statement”).

14 (2) Exhibit F – a two page account statement for Rickey’s World Famous Hot Sauce from
15 a Wells Fargo Business Choice Checking account for the period of March 1, 2018
16 through March 31, 2018 marked with Bates stamp numbers MITCHELL 007859-
17 007860 (the “Second March 2018 Bank Statement”)

18 PLEASE TAKE FURTHER NOTICE that the First March 2018 Bank Statement and the
19 Second March 2018 Bank Statement and the declaration lodged therewith will be placed in the
20 public court file unless Plaintiff files a timely motion or application to seal the records under Rule
21 2.551 of the California Rules of Court.

22 Respectfully submitted,

23 Dated: November 1, 2023

TASHROUDIAN LAW GROUP, APC

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25 By: /s/ David Tashroudian, Esq.
26 David Tashroudian, Esq.
27 Mona Tashroudian, Esq.
28 Attorneys for Twin Galaxies, LLC

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 November 1, 2023, I served the herein described document(s):

NOTICE OF LODGMENT IN SUPPORT OF MOTION FOR ISSUE SANCTIONS

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 & rwcohen@robertwcohenlaw.com pursuant to an agreement of the parties.

Anthony J. Ellrod tony.ellrod@manningkass.com
Kristina Ross Kristina.Ross@manningkass.com
MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
801 S. Figueroa St, 15th Floor
Los Angeles, California 90017-3012

Attorneys for Plaintiff
WILLIAM JAMES MITCHELL

Robert W. Cohen rwcohen@robertwcohenlaw.com
Law Offices of Robert W. Cohen, APC
1901 Avenue of the Stars, Suite 1910
Los Angeles, CA 90067

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 November 1, 2023 at Woodland Hills, California.



Mona Tashroudian