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Attorneys for Twin Galaxies, LLC

FILED
Superior Court of California
County of Los Angeles

11/14/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: A. Rodriguez Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

WILLIAM JAMES MITCHELL,

Plaintiff,

v.

TWIN GALAXIES, LLC; and Does 1-10,

Defendants.

AND RELATED CROSS-ACTION

Case No. 19STCV12592

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

**~~PROPOSED~~ ORDER AFTER
INFORMAL DISCOVERY CONFERENCE**

IDC Hearing

Date: October 26, 2022

Time: 10:00 a.m.

Place: Department 36

Action Filed: 4/11/2019

~~**PROPOSED**~~ ORDER

The Court, having conducted an Informal Discovery Conference pursuant to California Code of Civil Procedure section 2016.080 on October 26, 2022 concerning a dispute over the responses of plaintiff and cross-defendant William James Mitchell ("Mitchell") to certain inspection demands of defendant and cross-complainant Twin Galaxies, LLC ("Twin Galaxies"), and having considered the joint statement of the parties and the argument of counsel at the conference, and finding good cause for the issuance of this Order, hereby ORDERS as follows:

1. Plaintiff shall produce copies of all documents and tangible things which were promised to be produced in his written responses to Twin Galaxies' inspection demands within fourteen (14) days of the date of this Order, except that Plaintiff shall produce documents relating to communications with Walter Day on a rolling basis, but within a reasonable time, as those documents are collected by Plaintiff;
2. Plaintiff shall produce for inspection and testing the subject box referred to in Twin Galaxies' Demand for Inspection No. 19 on December 15, 2022 at Plaintiff's counsel's office in Los Angeles;
3. Plaintiff shall produce in native format the electronic Quickbooks file, or electronic file from an equivalent or other bookkeeping software, for Rickey's World Famous Hot Sauce for 2017, 2018, and 2019 pursuant to Twin Galaxies' Demand for Inspection No. 55;
4. Plaintiff shall produce income statements for Rickey's World Famous Hot Sauce for 2017, 2018, and 2019 as represented by Plaintiff's counsel on page 5, lines 22-23, of the parties' October 21, 2022 Joint Informal Discovery Statement within fourteen (14) days of the date of this Order;
5. The deadline for Twin Galaxies to move to compel a further response to its Demand for Inspection No. 59 is tolled from October 26, 2022 to December 6, 2022 pursuant to California Code of Civil Procedure section 2016.080(c)(2); and,

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1 6. Twin Galaxies shall be entitled to move to compel a further response to its Demand
2 for Inspection No. 59 with the hearing on such motion to be held on December 6,
3 2022 at 8:30 a.m. in this Department.

4 **IT IS SO ORDERED.**

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7 Dated: 11/14/2022



A handwritten signature in black ink, appearing to read "Wendy Chang", is written over the printed name.

Wendy Chang / Judge
Hon. Wendy Chang
Judge of the Superior Court

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 3, 2022, I served the herein described document(s):

[PROPOSED] ORDER AFTER INFORMAL DISCOVERY CONFERENCE

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 jeg@manningllp.com & rwcohen@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.

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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 November 3, 2022 at Woodland Hills, California.



Mona Tashroudian