

Anthony J. Ellrod (State Bar No. 136574)
 tony.ellrod@manningkass.com
 Kristina Ross (State Bar No. 325440)
 kristina.ross@manningkass.com
MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP
 801 S. Figueroa St, 15th Floor
 Los Angeles, California 90017-3012
 Telephone: (213) 624-6900
 Facsimile: (213) 624-6999

Electronically FILED by
 Superior Court of California,
 County of Los Angeles
 11/27/2023 7:22 PM
 David W. Slayton,
 Executive Officer/Clerk of Court,
 By S. Bolden, Deputy Clerk

Attorneys for Plaintiff, WILLIAM JAMES MITCHELL

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

WILLIAM JAMES MITCHELL,

Plaintiff,

v.

TWIN GALAXIES, LLC,

Defendants.

Case No. 19STCV12592

[Hon. Hon. Wendy Chang, Department 36]

**PLAINTIFF'S REQUEST FOR JUDICIAL
 NOTICE IN SUPPORT OF INFORMAL
 DISCOVERY CONFERENCE
 STATEMENT**

[Filed concurrently with JOINT INFORMAL
 DISCOVERY CONFERENCE
 STATEMENT]

Date: December 1, 2023
 Time: 8:30 a.m.
 Dept.: 36

Trial Date: 1/26/2023

TO THE HONORABLE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:


PLEASE TAKE NOTICE THAT on December 1, 2023 at 8:30 a.m. or as soon thereafter
 as counsel may be heard, in Department 36 of the above-captioned Court, Plaintiff WILLIAM
 JAMES MITCHELL, will and hereby does respectfully request that the Court take judicial notice,
 pursuant to *Evidence Code* §452, of the following fact: when a person has Facebook messages with
 another Facebook user, said message are not automatically deleted upon the user unfriending the
 person on Facebook.

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Judicial notice is properly granted for the foregoing fact as the fact is not reasonably subject to dispute and is capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy. *Evidence Code* §452(h).

DATED: November 27, 2023

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

By: 

Anthony J. Ellrod
Kristina Ross
Attorneys for Plaintiff
WILLIAM JAMES MITCHELL

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.

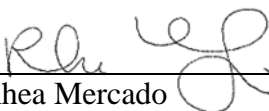
On November 27, 2023, I served true copies of the following document(s) described as **PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF INFORMAL DISCOVERY CONFERENCE STATEMENT** on the interested parties in this action as follows:

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 Attorney for Defendants, TWIN GALAXIES	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 Attorneys for Cross-Defendant, WALTER DAY
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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 November 27, 2023, at Los Angeles, California.


Rhea Mercado