1	Anthony J. Ellrod (State Bar No. 136574) tony.ellrod@manningkass.com	Electronically FILED by Superior Court of California,
2	Kristina Ross (State Bar No. 325440) kristina.ross@manningkass.com	County of Los Angeles 3/11/2024 6:43 PM
3	MANNING & KASS ELLROD, RAMIREZ, TRESTER LLP	David W. Slayton, Executive Officer/Clerk of Court, By V. Sino-Cruz, Deputy Clerk
4	801 S. Figueroa St, 15 <sup>th</sup> Floor Los Angeles, California 90017-3012	- <b>,</b> ,,
5	Telephone: (213) 624-6900 Facsimile: (213) 624-6999	
6		
7	Attorneys for Plaintiff, WILLIAM JAMES MITCHELL	
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
9	COUNTY OF LOS ANGELES, CENTRAL DISTRICT	
10		
11	WILLIAM JAMES MITCHELL,	Case No. 19STCV12592
12	Plaintiff,	[Hon. Wendy Chang, Department 36]
13	V.	PLAINTIFF'S NOTICE OF LODGING
14	TWIN GALAXIES, LLC,	CONDITIONALLY UNDER SEAL RE PLAINTIFF'S MOTION TO ENFORCE
15	Defendants.	SETTLEMENT AGREEMENT PURSUANT TO C.C.P. SECTION 664.6
16		[Filed concurrently with Plaintiff's Motion to
17 18		Enforce Settlement Agreement; [PROPOSED] Order; Motion to Seal; and [PROPOSED] Order re Motion to Seal]
19		Date: May 30, 2024
20		Time: 8:30 a.m. Dept: 36
21		Reservation No.: 184998743012
22		
23	PLEASE TAKE NOTICE THAT on March 11, 2024 Plaintiff WILLIAM JAMES	
24	MITCHELL ("Plaintiff") will and hereby does, pursuant to California Rules of Court 2.551(b)(4).	
25	lodge conditionally under seal the following documents:	
26	Document	Portions to be Sealed
27	Plaintiff's Motion to Enforce Settlement	Text highlighted in yellow.
28	<u> </u>	1

Agreement Pursuant to C.C.P Section 664.6	
("Motion")	
Exhibit A to Motion	In its' entirety. Text highlighted in yellow.
Exhibit B to Motion	Text highlighted in yellow.
Exhibit C to Motion	Text highlighted in yellow.
Exhibit D to Motion	Text highlighted in yellow.

Plaintiff is moving to seal the aforementioned in a Motion to be Seal set to be heard on May 30, 2024 at 8:30 a.m. in Department 36 of the above-entitled Court.

DATED: March 11, 2024

MANNING & KASS ELLROD, RAMIREZ, TRESTER LLP

By:

Anthony J. Ellrod Kristina Ross

Attorneys for Plaintiff

WILLIAM JAMES MITCHELL

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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 March 11, 2024, I served true copies of the following document(s) described as **PLAINTIFF'S NOTICE OF LODGING CONDITIONALLY UNDER SEAL RE PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT AGREEMENT PURSUANT TO C.C.P. SECTION 664.6** on the interested parties in this action as follows:

David Tashroudian, Esq.
Mona Tashroudian, Esq.
TASHROUDIAN LAW GROUP, APC
12400 Ventura Boulevard, Suite 300
Studio City, CA 91604

Attorney for Defendants, TWIN GALAXIES

T: (818) 561-7381 F: (818) 561-7381 Email: david@tashla

Email: <u>david@tashlawgroup.com</u> <u>mona@tashlawgroup.com</u>

**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 March 11, 2024, at Los Angeles, California.

Rhea Mercado