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Electronically FILED by
Superior Court of California,
County of Los Angeles
5/22/2024 4:30 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By J. Abraham, Deputy Clerk

7 Attorneys for Plaintiff, WILLIAM JAMES MITCHELL

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

11 WILLIAM JAMES MITCHELL,
12 Plaintiff,
13 v.
14 TWIN GALAXIES, LLC,
15 Defendants.

Case No. 19STCV12592
[Hon. Hon. Wendy Chang, Department 36]
**DECLARATION OF KRISTINA ROSS IN
SUPPORT OF REPLY TO PLAINTIFF’S
MOTION TO ENFORCE SETTLEMENT
AGREEMENT PURSUANT TO C.C.P.
SECTION 664.6**
[Filed concurrently with Reply ISO Plaintiff’s
Motion; Declaration of William James
Mitchell; Evidentiary Objections; Reply to
Motion to Seal]
Date: May 30, 2024
Time: 8:30 a.m.
Dept.: 36
Reservation No.: 184998743012

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1 I, KRISTINA ROSS, declare as follows:

2 1. I am an attorney at law duly licensed to practice before all the courts of the State of
3 California, and am an associate of the law firm of Manning & Kass, Ellrod, Ramirez, Trester, LLP,
4 attorneys of record for Plaintiff WILLIAM JAMES MITCHELL (“Plaintiff”).

5 2. If called upon to testify as to the matters herein related, I could and would
6 competently do so based upon my review of the litigation file herein and my personal participation
7 as one of the attorneys of record herein.

8 3. The parties entered into a written Settlement Agreement [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]

12 This was because the [REDACTED]

13 [REDACTED] The parties were clear that the terms of the Settlement Agreement were to [REDACTED]
14 [REDACTED]

15 4. [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]

20 5. [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]

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[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

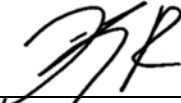
[REDACTED]

[REDACTED]

[REDACTED]

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

Executed on this May 22, 2024, in Los Angeles, California.



Kristina Ross

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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.

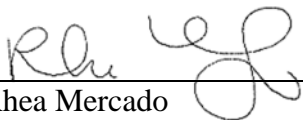
On May 22, 2024, I served true copies of the following document(s) described as **DECLARATION OF KRISTINA ROSS IN SUPPORT OF REPLY TO PLAINTIFF’S MOTION TO ENFORCE SETTLEMENT AGREEMENT PURSUANT TO C.C.P. SECTION 664.6** on the interested parties in this action as follows:

David Tashroudian, Esq. *Attorney for Defendants,*
Mona Tashroudian, Esq. *TWIN GALAXIES*
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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 May 22, 2024, at Los Angeles, California.



Rhea Mercado