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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

11 Attorneys for Plaintiff, WILLIAM JAMES MITCHELL

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

14 WILLIAM JAMES MITCHELL,  
15 Plaintiff,  
16 v.  
17 TWIN GALAXIES, LLC,  
18 Defendants.

**Case No. 19STCV12592**  
[Hon. Hon. Wendy Chang, Department 36]

**DECLARATION OF WILLIAM JAMES MITCHELL 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 Kristina Ross; Evidentiary Objections; Reply to Motion to Seal]]

Date: May 30, 2024  
Time: 8:30 a.m.  
Dept.: 36

*Reservation No.: 184998743012*

19 I, WILLIAM JAMES MITCHELL, declare as follows:

20 1. I am a party in the above-entitled action. I have personal knowledge of the facts set  
21 forth herein, except as to those stated on information and belief and, as to those, I am informed and  
22 believe them to be true. If called as a witness, I could and would competently testify to the matters  
23 stated herein.  
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2. I am the Plaintiff in this case and brought this lawsuit against Twin Galaxies, LLC. for defamation and false light originating from its public statements of April 12, 2018. I am a professional videogame player, mostly known for achieving world records on Pac-Man and Donkey Kong.

3. On January 16, 2024, after Twin Galaxies released the agreed upon standalone article, I posted a statement regarding the settlement agreement with Twin Galaxies on my Twitter account, @BillyPacman. My statement noted that Twin Galaxies had reinstated all of my videogame world records and quoted Twin Galaxies’ article, which stated in pertinent part that “Twin Galaxies shall heretofore reinstate all of Mr. Mitchell’s scores as part of the official historical database on Twin Galaxies’ website.” Attached hereto as Exhibit “A” is a true and correct copy of the entirety of my Twitter post on January 16, 2024.

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 21, 2024, in Ft. Lauderdale, Florida.

*William J. Mitchell*  
\_\_\_\_\_  
William James Mitchell

# EXHIBIT A



**Billy Mitchell** 

@BillyPacman



Twin Galaxies has reinstated all of my world records from my videogame career. Here's my statement:



## Statement from Billy Mitchell

Today, January 16, 2024, Twin Galaxies has reinstated all of the videogame world records that I achieved in my career, effective immediately. Twin Galaxies' statement on its website reads in pertinent part:

“In fair consideration of the expert opinion provided by Dr. Zyda on behalf of Mr. Mitchell, and consistent with Twin Galaxies' dedication to the meticulous documentation and preservation of video game score history, Twin Galaxies shall heretofore reinstate all of Mr. Mitchell's scores as part of the official historical database on Twin Galaxies' website.”

I am relieved and satisfied to reach this resolution after an almost six year ordeal and look forward to pursuing my unfinished business elsewhere.

Never Surrender,  
Billy 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.

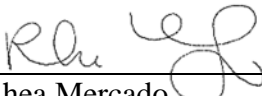
On May 22, 2024, I served true copies of the following document(s) described as **DECLARATION OF WILLIAM JAMES MITCHELL IN SUPPORT OF REPLY TO PLAINTIFF’S MOTION TO ENFORCE SETTLEMENT AGREEMENT PURSUANT TO C.C.P. SECTION 664.6** on the interested parties in this action as follows:

David Tashroudian, Esq.	<i>Attorney for Defendants,</i>
Mona Tashroudian, Esq.	<i>TWIN GALAXIES</i>
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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