

1 Anthony J. Ellrod (State Bar No. 136574)  
2 *tony.ellrod@manningkass.com*  
3 Kristina Ross (State Bar No. 325440)  
4 *kristina.ross@manningkass.com*  
5 **MANNING & KASS**  
6 **ELLROD, RAMIREZ, TRESTER LLP**  
7 801 S. Figueroa St, 15<sup>th</sup> Floor  
8 Los Angeles, California 90017-3012  
9 Telephone: (213) 624-6900  
10 Facsimile: (213) 624-6999

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

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. Wendy Chang, Department 36]

**PLAINTIFF’S NOTICE OF LODGING  
CONDITIONALLY UNDER SEAL RE  
PLAINTIFF’S MOTION TO ENFORCE  
SETTLEMENT AGREEMENT  
PURSUANT TO C.C.P. SECTION 664.6**

[Filed concurrently with Plaintiff’s Reply ISO  
Motion to Enforce; Declaration of William  
James Mitchell; Declaration of Kristina Ross;  
Evidentiary Objections; Reply ISO Motion to  
Seal]

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

*Reservation No.: 184998743012*

19 PLEASE TAKE NOTICE THAT on May 22, 2024 Plaintiff WILLIAM JAMES  
20 MITCHELL (“Plaintiff”) will and hereby does, pursuant to California Rules of Court 2.551(b)(4).,  
21 lodge conditionally under seal the following documents:  
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Document	Portions to be Sealed
Plaintiff’s Reply to Motion to Enforce	Text highlighted in yellow.


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Settlement Agreement Pursuant to C.C.P Section 664.6 (“Reply”)	
Declaration of Kristina Ross	Text highlighted in yellow.

Plaintiff is moving to seal the aforementioned pursuant to the Motion to be Seal filed on March 11, 2024 and set to be heard on May 30, 2024 at 8:30 a.m. in Department 36 of the above-entitled Court.

DATED: May 22, 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 May 22, 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  
T: (818) 561-7381  
F: (818) 561-7381  
Email: [david@tashlawgroup.com](mailto:david@tashlawgroup.com)  
[mona@tashlawgroup.com](mailto:mona@tashlawgroup.com)

*Attorney for Defendants,  
TWIN GALAXIES*

**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