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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]

**REPLY IN SUPPORT OF PLAINTIFF’S
MOTION TO SEAL RE PLAINTIFF’S
MOTION TO ENFORCE SETTLEMENT
AGREEMENT**

[Filed concurrently with: Reply ISO Plaintiff’s
Motion to Enforce Settlement Agreement;
Notice of Lodging]

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

Reservation No.: 485151508422

19 TO THE HONORABLE COURT, THE PARTIES AND THEIR ATTORNEYS OF RECORD:

20 Plaintiff WILLIAM JAMES MITCHELL (“Plaintiff”) hereby submits this Reply Brief in
21 support of his Motion to Seal re Plaintiff’s Enforce the Settlement Agreement (“Motion to
22 Enforce”).
23

24 On March 11, 2024, Plaintiff filed a Motion to Seal his Motion to Enforce and supporting
25 documents thereto pursuant to California Rules of Court (“CRC”), Rules 2.550 and 2.551 on the
26 grounds that Plaintiff’s Motion to Enforce the Settlement Agreement concerns the settlement
27 agreement (“Settlement Agreement”) in the above-entitled and for reasons set forth fully in the
28 concurrent Motion to Enforce the portions redacted should be sealed. Defendant TWIN

1 GALAXIES, LLC (“Defendant”) did not file any opposition to the Motion to Seal.

2 Additionally, on May 16, 2024, Defendant filed redacted copies of its’ Opposition to
3 Plaintiff’s Motion to Enforce and its’ supporting declarations noting that it redacted materials from
4 conditionally sealed record. Defendant also lodged unredacted copies of its’ Opposition and
5 supporting declarations noting that such copies may not be examined without Court order as they
6 contained material from conditionally sealed record.

7 Finally, filed concurrently with the herein Reply, Plaintiff filed a redacted version of his
8 Reply in support of the Motion to Enforce and Declaration of Kristina Ross in support of the Reply,
9 as well as lodging the unredacted versions of each as each contain similar material information as
10 the Motion to Enforce which needs to be sealed as set forth in Plaintiff’s Motion to Seal.

11 Plaintiff therefore respectfully requests the Court for an Order to additionally seal: (1) the
12 unredacted version of Defendant’s Opposition to Plaintiff’s Motion to Enforce; (2) the unredacted
13 version of the Declaration of David A. Tashroudian in support of the Opposition; (3) the unredacted
14 version of the Declaration of Jason Hall in support of the Opposition; (4) the unredacted version of
15 Plaintiff’s Reply in support of his Motion to Enforce; and (5) the unredacted version of the
16 Declaration of Kristina Ross in support of the Reply based upon the reasoning and legal standard
17 set forth in Plaintiff’s Motion to Seal.

18 Plaintiff additionally requests that the Court Order the hearing on this matter as to discussion
19 of the redacted portions of the Motion to Enforce, Opposition, and Reply be conducted *in camera*,
20 or in the alternative, without any non-involved persons aside from court staff to leave the courtroom
21 and any parties present to keep the information confidential.

22

23 DATED: May 22, 2024

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

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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 **REPLY IN SUPPORT OF PLAINTIFF’S MOTION TO SEAL RE PLAINTIFF’S MOTION TO ENFORCE SETTLEMENT AGREEMENT** 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