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7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

11 WILLIAM JAMES MITCHELL,

12 Plaintiff,

13 v.

14 TWIN GALAXIES, LLC; and Does 1-10,

15 Defendants.

Case No. 19STCV12592

Assigned to: Hon. Gregory W. Alarcon
[Dept. 36]

**NOTICE OF MOTION AND MOTION
FOR UNDERTAKING [CCP § 1030(a)];
MEMORANDUM OF POINTS &
AUTHORITIES IN SUPPORT**

*[Filed concurrently with: (1) Declaration of
Jason Hall; (2) Declaration of David W. Race;
(3) Declaration of David A. Tashroudian; and,
(4) [Proposed] Order]*

Hearing

Date: October 15, 2020

Time: 8:30 a.m.

Place: Department 36

RESERVATION ID: 318507386346

Action Filed: 4/11/2019

1 **NOTICE OF MOTION AND MOTION**

2 **TO THE HONORABLE COURT, AND TO ALL ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that on October 15, 2020 at 8:30 a.m., or as soon thereafter as
4 the matter may be heard, in Department 36 of the above entitled court, located at 111 N. Hill Street,
5 Los Angeles, California 90012, defendant Twin Galaxies, LLC ("Defendant") will and hereby
6 does move, pursuant to the provisions of the California *Code of Civil Procedure* 1030(a), for an
7 order requiring William James Mitchell ("Plaintiff") to file an undertaking to secure an award of
8 costs and attorney's fees which may be awarded in this action in the amount of \$81,2250.00.

9 Defendant makes this motion on the grounds that Plaintiff resides out-of-state and there is
10 a reasonable possibility that Defendant will obtain judgment in this matter. This motion will be
11 based upon this notice of motion; the attached memorandum of points and authorities in support;
12 the declarations of David A. Tashroudian, Jason Hall, and David W. Race; the matters which the
13 Court may take judicial notice of; any further evidence or argument that the Court may receive at
14 or before the hearing; and the pleadings and other records in this action which shall be incorporated
15 herein by this reference; including but not limited to: (1) Special Motion to Strike [Filed
16 3/30/2020]; (2) Declaration of Jason Hall [Filed 3/30/2020]; (3) Declaration of David Tashroudian
17 [Filed 3/30/2020]; (4) Request for Judicial Notice [Filed 3/30/2020]; (5) Reply ISO Special
18 Motion to Strike [Filed 6/26/2020]; (6) Declaration of Steven Kleisath [Filed 6/26/2020]; (7)
19 Declaration of Dwayne Richard [Filed 6/26/2020]; (8) Declaration of Chris Gleed [Filed
20 6/26/2020]; (9) Declaration of Carlos Pineiro [Filed 6/26/2020]; (10) Declaration of Robert
21 Mruczek [Filed 6/26/2020]; and, (11) Reply Declaration of Jason Hall [Filed 6/26/2020].

22 Respectfully submitted,

23 Dated: September 22, 2020

TASHROUDIAN LAW GROUP, APC

24
25 By: /s/ David Tashroudian, Esq.
26 David Tashroudian, Esq.
27 Mona Tashroudian, Esq.
28 Attorneys for Defendant Twin Galaxies,
LLC

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 There is a reasonable possibility that defendant Twin Galaxies will prevail against the
4 defamation claim of plaintiff Billy Mitchell such that he should be required to post an undertaking
5 to secure an award of cost and fees pursuant to California *Code of Civil Procedure* section 1030.

6 The fact is that Billy Mitchell will not be able to prove Twin Galaxies acted with the
7 requisite constitutional malice when it made the statement that videotape recordings of two of his
8 challenged Donkey Kong score performances were not from original unmodified hardware. The
9 documentary evidence and the testimony of witnesses establishes that Twin Galaxies engaged in
10 an appropriate investigation into the truth of the statement before the statement was made. It did
11 not act recklessly under the circumstances. Constitutional malice is an element of Billy Mitchell's
12 claim, and because he cannot prove it, there is a reasonable possibility judgment will be entered
13 in Twin Galaxies favor.

14 There is also a reasonable possibility a factfinder will determine the statement is true.
15 There is ample testimony in the record from experts, and from those that have tested the hardware
16 Billy Mitchell used to achieve the disputed scores, that it is impossible for what appears on the
17 videotape recordings of those scores to have come from an original unmodified Donkey Kong
18 arcade machine. Twin Galaxies will prevail on its truth affirmative defense accordingly.

19 Because Billy Mitchell admits he is an out-of-state plaintiff, and because there is a
20 reasonable possibility Twin Galaxies will obtain judgment in this matter, an undertaking in the
21 amount of \$81,2250.00 should be ordered to secure an award of costs and attorney's fees to Twin
22 Galaxies.

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1 **II. FACTS**¹

2 A. Twin Galaxies is the preeminent custodian of videogame world records.

3 Twin Galaxies is recognized world-wide as the foremost authority on videogame records
4 and maintains videogame record leaderboards on its website in database format. Billy Mitchell
5 previously held records for achievement in the Donkey Kong arcade videogame. These records
6 appeared on the Twin Galaxies points leaderboard database as: (1) 1,047,200 (the King of Kong
7 “tape”); (2) 1,050,200 (the Mortgage Brokers score); and (3) 1,062,800 (the Boomers score) (the
8 “Disputed Score Performances”).

9 Twin Galaxies has a dispute resolution process whereby a member of the public can
10 challenge the validity of a score in the leaderboard database. The goal of the dispute resolution
11 process is to ensure only valid scores are included in the score database. The dispute resolution
12 process is public and takes place on discussion forums on the Twin Galaxies website for the public
13 to read and comment-on. The process also, in appropriate circumstances, involves Twin Galaxies’
14 ultimate adjudication of the dispute. A challenged score is presumed valid until it is proven
15 otherwise through the dispute system.

16 B. Twin Galaxies investigates a public challenge to the videotape recordings of Billy
17 Mitchell’s Donkey Kong score performances.

18 Jeremy Young, a member of the public, challenged the Disputed Score Performances by
19 invoking Twin Galaxies’ score dispute resolution process on August 28, 2017. The gist of the
20 dispute is that the video recordings of the Disputed Score Performances could not have been made
21 by an original Donkey Kong arcade printed circuit board (PCB) because the video recordings
22 contain artifacts and anomalies (like the Girder Finger) that cannot be replicated on original Donkey
23 Kong hardware. The score dispute was published in a public forum thread on the Twin Galaxies
24 website. There were thousands of submissions to the score dispute thread, and millions of views.
25 The submissions consisted of the opinions of the public on the dispute, and it included the findings

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27 ¹ The facts surrounding the making of the allegedly defamatory statement are set forth in great detail and with citation
28 to evidence in Twin Galaxies’ Special Motion to Strike filed March 30, 2020, and its Reply in support of the Special
Motion to Strike filed June 26, 2020, and those facts are incorporated herein in support of the instant Motion for
Undertaking. Twin Galaxies restates a brief synopsis herein.

1 from Twin Galaxies and others on technical aspects of the dispute claim.

2 Because of the public interest in the dispute, Twin Galaxies began its own investigation to
3 render a final decision on the dispute claim. Twin Galaxies embarked on the most extensive review
4 of a score dispute that it has ever undertaken. Twin Galaxies' review and investigation took seven
5 (7) months and included labor hours and expenses to purchase specialized equipment to determine
6 whether the artifacts and anomalies identified in the videotape recordings of the Disputed Score
7 Performances could have come from an original unmodified Donkey Kong PCB. Twin Galaxies
8 also interviewed Twin Galaxies referee Todd Rodgers who Billy Mitchell claims witnessed the
9 1,050,200 (the Mortgage Brokers score) score performance. [*See* Undertaking Declaration of Jason
10 Hall ("Hall Decl."), ¶ 5, Exh. A.]

11 C. Billy Mitchell assembles a team to disprove the challenge to his Donkey Kong
12 score performances.

13 Billy Mitchell engaged in his own effort to disprove Jeremy Young's dispute claim. The
14 evidence is clear that Billy Mitchell assembled a team of technical experts (known as "Team Billy")
15 to explain-away the artifacts and anomalies on the videotape recordings of the Disputed Score
16 Performances. The technical lead was Carlos Pineiro, an electrical engineer and arcade machine
17 technician.

18 Billy Mitchell gave Carlos Pineiro access to the hardware he used to create the videotape
19 recordings of the Disputed Score Performances for testing. Billy Mitchell was actively involved in
20 Mr. Pineiro's testing, and was there in-person for much of it – often times playing sample games
21 for testing. On April 9, 2018, at the conclusion of Carlos Pineiro's investigation into the validity
22 of score dispute, his findings were published in the score dispute forum thread. He ultimately
23 found that the videotape recordings of the Disputed Score Performances could not have come from
24 an original Donkey Kong PCB. In no uncertain terms, his findings were consistent with Jeremy
25 Young's dispute claim.

26 D. The alleged defamatory statement, and Billy Mitchell's response.

27 Twin Galaxies issued its final decision on Jeremy Young's dispute claim after Carlos
28 Pineiro made his findings public in the dispute thread. Twin Galaxies published its decision on

1 April 12, 2018, opining that the videotape recordings of two-of-three of the Disputed Score
2 Performances – the 1,047,200 (the King of Kong “tape”), and the 1,050,200 (the Mortgage Brokers
3 score) – were not from an original Donkey Kong PCB and therefore are not eligible for inclusion
4 on the Donkey Kong arcade leaderboard. Twin Galaxies found that there was insufficient evidence
5 to determine the dispute with respect to the 1,062,800 (the Boomers score) score performance.

6 Billy Mitchell filed suit against Twin Galaxies on April 11, 2019 for making the statement
7 that the videotaped recordings of the 1,047,200 (the King of Kong “tape”), and the 1,050,200 (the
8 Mortgage Brokers score) score performances were not produced from an original unmodified
9 Donkey Kong arcade PCB. [See First Amended Complaint, ¶ 18.] Billy Mitchell sent Twin
10 Galaxies a demand letter on September 9, 2019 demanding that it retract the allegedly defamatory
11 statement. [See Hall Decl., ¶ 7, Exh. 8.] The demand letter was accompanied by a 166 page
12 document titled “Billy Mitchell Evidence Package.” [Id. at ¶ 8, Exh. C.]

13 E. David W. Race.

14 The Billy Mitchell Evidence Package includes a Section 10 on Technical Evidence; Part 1
15 on Scientific Expert Testimony where Billy Mitchell proffers the testimony of David W. Race in
16 support of the withdrawal demand. [See Hall Decl., ¶ 8, Exh. C at pp. 123-136.] David W. Race
17 was a member of Team Billy and sought to disprove the assertions made by Jeremy Young in the
18 dispute claim. [See Declaration of David W. Race (“Race Decl.”), ¶¶ 8-13.] David W. Race, like
19 Carlos Pineiro, was given access to the original hardware Billy Mitchell used to create the
20 videotape recordings of the Disputed Score Performances. [Id. at ¶¶ 14-19.] After extensive
21 testing of Billy Mitchell’s equipment, Mr. Race too concluded that the 1,047,200 (the King of
22 Kong “tape”), and the 1,050,200 (the Mortgage Brokers score) score performances were not
23 produced from an original unmodified Donkey Kong arcade PCB. [Id. at ¶ 20.]

24 **III. ARGUMENT**

25 A. Legal standard to require an undertaking pursuant to California Code of Civil
26 Procedure section 1030.

27 California Code of Civil Procedure section 1030 requires an out-of-state plaintiff to file an
28 undertaking to secure recoverable costs and attorney’s fees if the defendant shows a reasonable

1 possibility that it will obtain judgment in the action. (Cal. Code Civ. Proc. §§ 1030(a)-(b); *see also*
2 Baltayan v. Estate of Getemyan (2001) 90 Cal. App. 4th 1427, 1430.) Defendants need not show
3 that there is “no possibility” that plaintiffs would win at trial, “but only that it [is] reasonably
4 possible that the defendant will win.” (*Id.* at 1432.)

5 The purpose of the statute is to enable a California defendant sued by an out-of-state
6 plaintiff “to secure costs in light of the difficulty of enforcing a judgment for costs against a person
7 who is not within the court's jurisdiction.” (Shannon v. Sims Service Center, Inc. (1985) 164 Cal.
8 App. 3d 907, 913.) “The statute therefore acts to prevent out-of-state residents from filing
9 frivolous lawsuits against California residents.” (Yao v. Superior Court (2002) 104 Cal. App. 4th
10 327, 331.)

11 B. Plaintiff resides out-of-state.

12 Plaintiff Billy Mitchell pleads in his First Amended Complaint that he is an individual
13 residing in Florida. [*See* First Amended Complaint, ¶ 18.] His judicial admissions is sufficient to
14 require an undertaking to secure costs and fees if Twin Galaxies establishes a reasonable possibility
15 of obtaining judgment. (*See* Gelfo v. Lockheed Martin Corp. (2006) 140 Cal. App. 4th 34, 48 (“[a]
16 judicial admission is a party’s unequivocal concession of the truth of a matter, and removes the
17 matter as an issue in the case. [citations]”); *see also* Cal. Code Civ. Proc. § 1030(b).)

18 C. There is a reasonable possibility Twin Galaxies will obtain a judgment in its favor.

19 Twin Galaxies needs not prove its case and show conclusively that Billy Mitchell will not
20 prevail at trial. To the contrary, on this motion, Twin Galaxies must meet the significantly lower
21 standard of showing only a *reasonable possibility* of obtaining a judgment to require an
22 undertaking. (*See* Baltayan, *supra*, 90 Cal. App. 4th at 1432; *see also* Cal. Code Civ. Proc. §
23 1030(a).)

24 There is at least a reasonable possibility Twin Galaxies will prevail against Billy Mitchell’s
25 defamation claim. For one thing, Billy Mitchell is an admitted public figure and he will not be able
26 to show with clear and convincing evidence that Twin Galaxies acted with the requisite
27 constitutional malice. And for another, it is reasonably possible a fact-finder will determine the
28 defamatory statement is true.

1 i. Legal Standard for a public figure to prevail on a defamation claim.

2 A claim for defamation requires proof of a false and unprivileged publication that exposes
3 the plaintiff “to hatred, contempt, ridicule, or obloquy, or which causes him to be shunned or
4 avoided, or which has a tendency to injure him in his occupation.” (Cal. Civ. Code, § 45.)

5 When the plaintiff is a public figure, he or she must show the speaker made the
6 objectionable statement with malice in its constitutional sense “that is, with knowledge that it was
7 false or with reckless disregard of whether it was false or not.” (Reader’s Digest Assn. v. Superior
8 Court (1984) 37 Cal.3d 244, 256.) A public figure must demonstrate by “clear and convincing
9 evidence” that the challenged statements were made with “actual malice.” (Conroy v. Spitzer
10 (1990) 70 Cal. App. 4th 1446, 1451 (in addressing whether the plaintiff has demonstrated the
11 existence of a prima facie case, “we bear in mind the higher clear and convincing standard of
12 proof”).)

13 To show actual malice, Billy Mitchell must demonstrate that Twin Galaxies either knew
14 the alleged defamatory statements were false or subjectively entertained serious doubt the
15 statements were truthful. (Bose Corp. v. Consumers Union of U.S., Inc. (1984) 466 U.S. 485, 511.)
16 The question is not “whether a reasonably prudent man would have published, or would have
17 investigated before publishing. There must be sufficient evidence to permit the conclusion that the
18 defendant in fact entertained serious doubts as to the truth of his publication. Publishing with such
19 doubts shows reckless disregard for truth or falsity and demonstrates actual malice.” (Reader’s
20 Digest Assn., supra, 37 Cal.3d at pp. 256-257.)

21 ii. Billy Mitchell cannot show Twin Galaxies acted with actual malice.

22 Billy Mitchell is a public figure. [See Special Motion to Strike [Filed 3/30/2020], 12:17-
23 13:23 (pp:ln).] He must adduce clear and convincing evidence that Twin Galaxies acted with
24 reckless disregard for the truth. He cannot. The evidence adduced in support of the Special Motion
25 to Strike is of such a nature and quality that, for the purposes of this undertaking motion, there a
26 reasonable possibility the factfinder will determine that Twin Galaxies was not reckless and
27 always sought the truth.

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1 The facts are that Twin Galaxies did not act with heightened constitutional malice in stating
2 that the videotape recordings of the Disputed Score Performances were not from an original
3 Donkey Kong arcade PCB. [See Special Motion to Strike [Filed 3/30/2020], § III(C)(iv); see also
4 Reply [Filed 6/26/2020], § III(B).] Quite the opposite is true, the statement was made after
5 extensive investigation and technical analysis; and in consideration of the opinion of Billy
6 Mitchell’s expert Carlos Pineiro. [Id.]

7 But there is more than what was presented in the papers supporting the Special Motion to
8 Strike. Billy Mitchell will rely on the argument that Twin Galaxies did not interview eyewitness
9 to the 1,050,200 (the Mortgage Brokers score) score performance, and it was therefore reckless in
10 its investigation. [See Opposition to Special Motion to Strike [Filed 6/22/2020], §III(B).] Jason
11 Hall of Twin Galaxies, however, at the very outset of the dispute claim by Jeremy Young,
12 contacted and interviewed Todd Rogers who is the referee that Mitchell claims witnessed the
13 1,050,200 (the Mortgage Brokers score) score performance to discuss the dispute claim on August
14 29, 2017 – the day after Jeremy Young initiated the dispute. [See Hall Decl., ¶¶ 4-6, Exh. A.]
15 What better source to go to than the referee that Billy Mitchell claims adjudicated the score? [See
16 Mitchell Declaration Exhibits [Filed 6/22/2020]; Exh. 9 (Declaration of Todd Rogers).] Todd
17 Rogers’ response to Hall’s questions about the dispute regarding Mitchell’s score performances
18 raised serious doubts about the integrity of the performances as Rogers acknowledged that perhaps
19 there were “shenanigans” surrounding Mitchell’s scores – particularly with respect to the *King of*
20 *Kong* tape score. [See Hall Decl., ¶¶ 5-6, Exh. A, at p. 2.]

21 Twin Galaxies has shown with competent and admissible evidence that it engaged in a
22 thorough investigation and considered all the facts and interviewed relevant witnesses before it
23 made the statement that the videotape recordings of the Disputed Score Performances were not
24 from an original unmodified arcade PCB. This record is sufficient to find there is a reasonable
25 possibility Billy Mitchell will not be able to prove the actual malice element of his claim resulting
26 in judgment for Twin Galaxies.

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1 iii. There is a reasonable possibility the statement is true.

2 Twin Galaxies proffers the expert testimony of Carlos Pineiro and Jason Hall to establish
3 that the videotape recordings of the Disputed Score Performances were not from an original
4 Donkey Kong PCB. [See Reply [Filed 6/26/2020], 6:15:7:4.] The two are experts in the field of
5 videogame technology with a special emphasis on hardware and the video interface of classic
6 arcade machines. [Id.] Their expert testimony alone is enough to find there is a reasonable
7 possibility Twin Galaxies will prevail on the affirmative defense of truth.

8 In addition, Twin Galaxies has secured the testimony of David W. Race to support this
9 Motion for Undertaking. Mr. Race was a member of “Team Billy” and worked with others,
10 including Carlos Pineiro, to disprove Jeremy Young’s dispute claim regarding the Disputed Score
11 Performances. [See Race Decl., ¶¶ 8-13.] Mr. Race, like Carlos Pineiro, was given access to the
12 original hardware that Billy Mitchell used to create the Disputed Score Performances and he tested
13 the hardware. [Id. at ¶¶ 14-15.] Even he is of the opinion that the videotape recordings of the
14 Disputed Score Performances cannot be from an original unmodified Donkey Kong PCB. [Id. at
15 ¶¶ 19-20.]

16 David Race’s testimony is especially persuasive because Billy Mitchell also relies on his
17 testimony. Billy Mitchell proffered Race’s expert testimony in the Billy Mitchell Evidence
18 Package to support the demand that Twin Galaxies withdraw the defamatory statement. [See Hall
19 Decl., ¶ 8, Exh. C, at pp. 123-136.] Billy Mitchell’s son draft specious declarations for David
20 Race that he refused to sign. [See Race Decl., ¶ 21, Exhs. A & B.] Billy Mitchell also cites David
21 Race in his Opposition to the Special Motion to Strike. [See Opposition to Special Motion to
22 Strike, 8:21-24]. David Race’s testimony that the statement is true, considering his connection
23 with Billy Mitchell, is compelling such that with it there is a reasonable possibility Twin Galaxies
24 will prevail on its truth affirmative defense.

25 D. Billy Mitchell should be required to post a bond for costs in the total amount of
26 \$81,2250.00.

27 The undertaking bond for a foreign litigant secures an award of costs and attorney’s fees
28 that may be made in favor of a prevailing defendant. (Cal. Code Civ. Proc., § 1030(a).) The

1 prevailing-party in an action is entitled to its costs. (Cal. Code Civ. Proc., § 1032(b).) Costs
2 allowable under *Code of Civil Procedure* section 1032 are codified at Section 1033.5(a). Twin
3 Galaxies respectfully submits that it will obtain a prevailing-party award of costs in this matter in
4 the amount of at least \$73,350.00. [See Undertaking Declaration of David A. Tashroudian
5 (“Tashroudian Decl.”), ¶ \$6.]

6 Twin Galaxies submits that it will also be entitled to costs and attorney’s fees incurred in
7 proving the truth of its requests for admission to Billy Mitchell. (Cal. Code Civ. Proc., §
8 2033.420(a).) Billy Mitchell has already declared to matters that are verifiably false. For example,
9 in an effort to distance himself from Carlos Pineiro, Billy Mitchell declares that he did not provide
10 Pineiro with any equipment or assistance during his investigation. The truth is that he did provide
11 equipment and vital assistance to Pineiro. [See Reply [Filed 6/26/2020], 13:8-14:7.] Twin
12 Galaxies will propound requests for admission to Billy Mitchell on these matters, and will have to
13 prove them up when Billy Mitchell’s responses remain incredulous. The amount of costs and fees
14 to make the proof will be no less than \$7875.00. [See Tashroudian Decl., ¶ 5.]

15 **IV. CONCLUSION**

16 Twin Galaxies respectfully requests that, based on the foregoing, this Court orders Billy
17 Mitchell to post an undertaking in the amount of \$81,2250.00.

18 Respectfully submitted,

19 Dated: September 22, 2020

TASHROUDIAN LAW GROUP, APC

21 By: /s/ David Tashroudian, Esq.
22 David Tashroudian, Esq.
23 Mona Tashroudian, Esq.
24 Attorneys for Defendant Twin Galaxies,
25 LLC
26
27
28

PROOF OF SERVICE
Case No. 19STCV12592

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is **TASHROUDIAN LAW GROUP, APC**, located 12400 Ventura Blvd., Suite 300, Studio City, California 91604. On September 22, 2020, I served the herein described document(s):

**NOTICE OF MOTION AND MOTION FOR UNDERTAKING [CCP § 1030(a)];
MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT**

by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Woodland Hills, California addressed as set forth below.

X E-File - by electronically transmitting the document(s) listed above to jeg@manningllp.com pursuant to an agreement of the parties.

X by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

by overnight courier of the document(s) listed above to the person(s) at the address(es) set forth below.

James E. Gibbons (State Bar No. 130631)
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Attorneys for Plaintiff
WILLIAM JAMES MITCHELL

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 22, 2020 at Studio City, California.

/s/ David Tashroudian, Esq



Make a Reservation

WILLIAM JAMES MITCHELL vs TWIN GALEXIES, LLC

Case Number: 19STCV12592 Case Type: Civil Unlimited Category: Defamation (slander/libel)

Date Filed: 2019-04-11 Location: Stanley Mosk Courthouse - Department 36

Reservation

Case Name: WILLIAM JAMES MITCHELL vs TWIN GALEXIES, LLC	Case Number: 19STCV12592
Type: Motion re: (for Undertaking)	Status: RESERVED
Filing Party: Twin Galaxies, LLC (Defendant)	Location: Stanley Mosk Courthouse - Department 36
Date/Time: 10/15/2020 8:30 AM	Number of Motions: 1
Reservation ID: 318507386346	Confirmation Code: CR-HN9XLUZFDHL4FEEK9

Fees

Description	Fee	Qty	Amount
Motion re: (name extension)	60.00	1	60.00
Credit Card Percentage Fee (2.75%)	1.65	1	1.65
TOTAL			\$61.65

Payment

Amount: \$61.65	Type: Visa
Account Number: XXXX7361	Authorization: 006022

Print Receipt

Reserve Another Hearing