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

WILLIAM JAMES MITCHELL,  
  
Plaintiff,  
  
v.  
  
TWIN GALAXIES, LLC,  
  
Defendants.

Case No. 19STCV12592  
[The Hon. GREGORY W. ALARCON DEPT.  
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**PLAINTIFF WILLIAM JAMES  
MITCHELL'S OBJECTION TO  
DEFENDANT'S EVIDENCE IN SUPPORT  
OF SPECIAL MOTION TO STRIKE**

**DATE: July 6, 2020**  
**TIME: 9:00 a.m.**  
**PLACE: Dept. 36**

Action Filed: 4/11/2019

Plaintiff WILLIAM JAMES MITCHELL submits the following Objections to the Declaration of Jace Hall submitted in support of Twin Galaxies' Special Motion to Strike.

**OBJECTIONS TO DECLARATION OF JACE HALL**

**Material Objected to:**

Paragraph 22: "I am attaching to this declaration as Exhibit A true and correct copy of the entirety of the Mitchell Score Dispute Claim Thread."

**Grounds for Objection:**

Lacks Foundation as representing the entirety of the thread. (Ev. Code § 403). Exhibit A ends at April 3, 2018, at 7:12PM PST. The dispute thread continued from April 4 to April 11, 2018. Then, after the retraction demand on September 9, 2019, Jace reopened the dispute thread until September 28, 2019. Jace closes the dispute thread at 2:04 a.m. PST on April 12, 2018: <https://www.twingalaxies.com/showthread.php/176004-Dispute-Jeremy-Young-Arcade-Donkey-Kong-Points-Hammer-Allowed-Player-Billy-L-Mitchell-Score-1-062-800/page326>. Note: People continued posting into the thread until Jace closed it. The final post occurred by "KarlJobst" at 11:40 p.m. PST on April 11, 2018. Jace reopens the thread on September 9, 2019: <https://www.twingalaxies.com/showthread.php/176004-Dispute-Jeremy-Young-Arcade-Donkey-Kong-Points-Hammer-Allowed-Player-Billy-L-Mitchell-Score-1-062-800/page326>. Jace closes the thread again on September 28, 2019. <https://www.twingalaxies.com/showthread.php/176004-Dispute-Jeremy-Young-Arcade-Donkey-Kong-Points-Hammer-Allowed-Player-Billy-L-Mitchell-Score-1-062-800/page377>.

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<b>Material Objected to:</b>  Exhibit B, 000002. "Most notable was the 3 <sup>rd</sup> party (Carlos Pineiro) that Billy engaged to examine the dispute case claims on his behalf[.]"	<b>Grounds for Objection:</b>  Lacks Foundation (Ev. Code § 403). There is no evidentiary support for the claim that Mr. Mitchell engaged Pineiro to examine the dispute on his behalf. In fact, Mitchell never engaged Pineiro. <i>See</i> Mitchell Decl., ¶ 72, Exh. 34 [Declaration of C. Pineiro ("I did not represent Billy Mitchell in the dispute, and my research was not being done on his behalf).] Moreover, Pineiro has completely retracted his statements regarding Mitchell's gameplay. <i>Id.</i>
<b><u>Material Objected to:</u></b>  Paragraph 42: ". . . Joel West who announced that Billy Mitchell had formed an independent technical investigation team (self-titled "Team Billy") to provide evidence in support of the validity of his taped score performances."	<b><u>Grounds for Objection:</u></b>  To the extent West's statement is to be taken for the truth of the matter – i.e., Mitchell had formed an investigative team called "Team Billy" – the statement is inadmissible hearsay. Ev. Code § 1200. The statement also lacks foundation, since West did not say what is attributed to him. Ev. Code § 403. In addition, Mitchell states that no "Team Billy" ever existed. Mitchell Decl., ¶ 118.
<b>MATERIAL OBJECTED TO:</b>  Paragraphs 44-45 with references to "Team Billy."	<b>GROUND FOR OBJECTION:</b>  The statement lacks foundation, since there is no evidence that a "Team Billy" was ever formed by Mr. Mitchell or acted on his behalf and at his direction. Ev. Code § 403; <i>see</i> Mitchell Decl., ¶ 118.

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DATED: June 22, 2020

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

By: \_\_\_\_\_  
James E. Gibbons  
Attorneys for Plaintiff WILLIAM JAMES  
MITCHELL

**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 June 22, 2020, I served true copies of the following document(s) described as **PLAINTIFF WILLIAM JAMES MITCHELL'S OBJECTION TO DEFENDANT'S EVIDENCE IN SUPPORT OF SPECIAL MOTION TO STRIKE** on the interested parties in this action as follows:

David A. Tashroudian, Esq. Mona Tashroudian, Esq. TASHROUDIAN LAW GROUP, APC 5900 Canoga Ave., Suite 250 Woodland Hills, California 91367 Telephone: (818) 561-7381 Facsimile: (818) 561-7381 Email: david@tashlawgroup.com Email: mona@tashlawgroup.com	Attorney for Defendants 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 mma@manningllp.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.

**ONLY BY ELECTRONIC TRANSMISSION:** Only by emailing the document(s) to the persons at the e-mail address(es). This is necessitated during the declared National Emergency due to the Coronavirus (COVID-19) pandemic because this office will be working remotely, not able to send physical mail as usual, and is therefore using only electronic mail. No electronic message or other indication that the transmission was unsuccessful was received within a reasonable time after the transmission. We will provide a physical copy, upon request only, when we return to the office at the conclusion of the National Emergency.

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

Executed on June 22, 2020, at Los Angeles, California.

/s/ Martha Alfaro  
\_\_\_\_\_  
Martha Alfaro