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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

WILLIAM JAMES MITCHELL,

Plaintiff,

v.

TWIN GALAXIES, LLC; and Does 1-10,

Defendants.

Case No. 19STCV12592

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

**DECLARATION OF CHRIS GLEED ISO
SPECIAL MOTION TO STRIKE OF
DEFENDANT TWIN GALAXIES, LLC
[CCP § 425.16]**

*[Filed concurrently with: (1) Declaration of
Steven Kleisath; (2) Declaration of Robert
Mruczek; (3) Declaration of Carlos Pineiro; (4)
Declaration of Dwayne Richard; (5)
Declaration of Jason Hall; (6) Objections to
Evidence; and (7) Reply]*

Hearing

Date: July 6, 2020

Time: 9:00 a.m.

Place: Department 36

RESERVATION ID: 095658146502

Action Filed: 4/11/2019

DECLARATION OF CHRIS GLEED

I, Chris Gleed, declare that:

1. I am an individual of the age of majority, and I make this declaration in support of the special motion to strike of Twin Galaxies, LLC ("Twin Galaxies"). The matters declared to herein are known to me personally to be true, and if called to testify to these facts, I could and would do so.

2. I am a video game hobbyist and am interested in video game records leaderboards. I am also a member of the Twin Galaxies community. I am a frequent contributor to the public discussions that take place on Twin Galaxies' message boards and forums.

3. In, or about, February 2018, I learned that Twin Galaxies user Jeremy Young posted a dispute claim in the Twin Galaxies dispute claim forum claiming that two of the videotapes historically used to justify Billy Mitchell's 1,047,200 (the King of Kong "tape"), and 1,050,200 (the Mortgage Brokers score) score performances could not be from original Donkey Kong hardware. I became interested in Mr. Young's claim and, like many others in the video game records community, sought to perform my own investigation into the claim.

4. From at least February 2018 through April 2018, I engaged in my own investigation of Jeremy Young's claim. I tested hardware, and I tested software to determine the validity of Mr. Young's claim. After countless hours of testing and analysis, I came to the conclusion that Mr. Young's claim is valid. It is simply impossible for the artifacts – particularly the Finger Girder – that appear in Mr. Mitchell's videotaped gameplay of these performances to come from an original, unmodified Donkey Kong printed circuit board.

5. I would regularly publish my findings in the Mitchell Score Dispute Claim Thread on the Twin Galaxies Website. In connection therewith, I would discuss my findings with the community, and with Jason Hall through public postings in the thread.

6. I was never hired by Twin Galaxies as a third-party investigator of Mr. Mitchell's claim. I did all of this out of my own desire to discover the truth, and out of an obligation to my brethren in the classic video game records community. Twin Galaxies did not direct my investigation in any way and I was not working on its behalf.

7. I personally harbor no ill will, animosity, or bias against Billy Mitchell. I was not investigating his scores to vex or annoy him. Rather, I was investigating his scores to discover the truth. And I firmly believe the truth is that the videotaped performances were not from an original Donkey Kong arcade PCB.

8. The balance of the Twin Galaxies community shares my sentiment. From my analysis and review of the comments posted on the Twin Galaxies Website, and from my conversation with other video game enthusiasts, I can say without hesitation that the consensus among the community members is that Billy Mitchell's videotape recording of his 1,047,200 (the King of Kong "tape"), and 1,050,200 (the Mortgage Brokers score) score performances did not come from an original Donkey Kong arcade PCB. The evidence supporting this assertion is overwhelming. There is more evidence than the fact the Girder Finger appears in Mr. Mitchell's gameplay, but not on original hardware. That is the tip of the iceberg but it is the easiest for the general public to understand.

I swear, under penalty of perjury of the laws of the State of California, that the foregoing is true and correct. Executed this 26th day of June, 2020 at Escondido, California.

/s/ Chris Gleed (original on file)

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 5900 Canoga Ave, Suite 250, Woodland Hills, CA 91367-5017. On June 26, 2020, I served the herein described document(s):

**DECLARATION OF CHRIS GLEED ISO SPECIAL MOTION TO STRIKE OF
DEFENDANT TWIN GALAXIES, LLC [CCP § 425.16]**

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.

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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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 June 26, 2020 at Woodland Hills, California.



Mona Tashroudian