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Attorneys for plaintiff Nona  
Gaprindashvili

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

NONA GAPRINDASHVILI, an  
individual,

Plaintiff,

v.

NETFLIX, INC., a Delaware  
corporation, and DOES 1-50,

Defendants.

CASE No. 2:21-cv-07408 VAP (SKx)

**DECLARATION OF ALEXANDER  
RUFUS-ISAACS**

Date: January 24, 2022

Time: 2:00 pm

Crtrm.: 8A

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DECLARATION OF ALEXANDER RUFUS-ISAACS

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I, Alexander Rufus-Isaacs, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Rufus-Isaacs Acland & Grantham LLP, attorneys of record for plaintiff Nona Gaprindashvili. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. Ms. Gaprindashvili does not speak fluent English. I obtained her original declaration in Russian bearing her signature, and provided it to Arriva Translations, a professional translation service. I received back a translation into English by Michael Ishenko, whom I am informed and believe to be a certified professional translator, along with a certificate of accurate translation. I am filing concurrently herewith the original declaration, the translation and the certificate.

3. I viewed and saved an article entitled “The series ‘Queen’s Move’ lied about the Soviet champion. She supposedly didn’t play with men,” World Today News, November 20, 2020, at <https://www.world-today-news.com/the-series-queens-move-lied-about-the-soviet-champion-she-supposedly-didnt-play-with-men/> Attached hereto marked Exhibit 4 is a true and correct of that article.

4. I viewed and saved an article entitled “The real-life Queen’s Gambit: how Georgia’s Nona Gaprindashvili conquered the chess world,” The Calvert Journal, November 27, 2020, at <https://www.calvertjournal.com/features/show/12351/real-life-queens-gambit-nona-gaprindashvili-georgian-women-chess-beth-harmon-netflix> Attached hereto marked Exhibit 5 is a true and correct of that article.

5. I viewed and saved a social media post of Anthony Shaw on Twitter @anthonypjshaw (Nov. 29, 2020),

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1 <https://twitter.com/anthonyjshaw/status/1333249169796939781?s=20> Attached  
2 hereto marked Exhibit 6 is a true and correct of page 1 of that post.

3 6. I viewed and saved a social media post of Steve Coyle, Twitter,  
4 @SEHCoyle (Nov. 20, 2020),  
5 <https://twitter.com/SEHCoyle/status/1329835286927380481?s=20> Attached hereto  
6 marked Exhibit 7 is a true and correct of page 1 of that post.

7 7. I viewed and saved a social media post of Larmes de Saint-Laurent,  
8 Twitter, @Fiel\_Laurentien (Nov. 28, 2020),  
9 [https://twitter.com/Fiel\\_Laurentien/status/1332886143428341761?s=20](https://twitter.com/Fiel_Laurentien/status/1332886143428341761?s=20) Attached  
10 hereto marked Exhibit 8 is a true and correct of page 1 of that post.

11 8. I viewed and saved a social media post of Medi, Twitter,  
12 @Medi050505 (Nov. 26, 2020),  
13 <https://twitter.com/medi050505/status/1331912451953221632?s=20> Attached  
14 hereto marked Exhibit 9 is a true and correct of that post.

15 9. I viewed and saved a social media post of Pumbaa, Twitter,  
16 @WarthogPumbaa (Nov. 29, 2020), Pumba, Twitter, @WarthogPumbaa (Nov. 29,  
17 2020), <https://twitter.com/WarthogPumbaa/status/1332980139999813633?s=20>  
18 Attached hereto marked Exhibit 10 is a true and correct of page 1 of that post.

19 10. I viewed and saved a series of social media posts on Reddit, January  
20 17, 2021, under the heading, “Why did The Queen’s Gambit lie about Nona  
21 Gaprindashvili?  
22 [https://www.reddit.com/r/chess/comments/kzg0e0/why\\_did\\_the\\_queens\\_gambit\\_lie](https://www.reddit.com/r/chess/comments/kzg0e0/why_did_the_queens_gambit_lie_about_nona/)  
23 [about\\_nona/](https://www.reddit.com/r/chess/comments/kzg0e0/why_did_the_queens_gambit_lie_about_nona/) Attached hereto marked Exhibit 11 is a true and correct of page 1 of  
24 those posts.

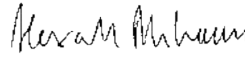
25  
26 I declare under penalty of perjury under the laws of the United States of  
27 America that the foregoing is true and correct.

28

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Executed December 3, 2021, at Beverly Hills, California.

  
\_\_\_\_\_  
Alexander Rufus-Isaacs

**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 9420 Wilshire Blvd., 2nd Floor, Beverly Hills, California 90212.

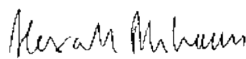
On December 3, 2021, I served true copies of the following document(s) described as **DECLARATION OF ALEXANDER RUFUS-ISAACS** on the interested parties in this action as follows:

Arwen Johnson  
Email: [arwen.johnson@kslaw.com](mailto:arwen.johnson@kslaw.com)  
Kelly Perigoe  
Email: [kperigoe@kslaw.com](mailto:kperigoe@kslaw.com)  
KING & SPALDING LLP  
633 West Fifth Street, Suite 1600  
Los Angeles, CA 90071

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am a member of the bar of this Court.

Executed on December 3, 2021, at Beverly Hills, California.

  
\_\_\_\_\_  
Alexander Rufus-Isaacs

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