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Attorneys for Defendants
Ghost Firearms, LLC, Thunder Guns, LLC,
Ryan Beezley and Bob Beezley,
and MFY Technical Solutions, LLC

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE**

FRANCISCO GUDINO CARDENAS, an
individual,

Plaintiff,

v.

GHOST GUNNER INC., d/b/a
GHOSTGUNNER.NET;

DEFENSE DISTRIBUTED d/b/a
GHOSTGUNNER.NET

CODY WILSON d/b/a GHOSTGUNNER.NET

BLACKHAWK MANUFACTURING GROUP
INC., d/b/a 80PERCENTARMS.COM;

RYAN BEEZLEY and BOB BEEZLEY, d/b/a
RBTACTICALTOOLING.COM;

GHOST AMERICA LLC, d/b/a
GHOSTGUNS.COM;

GHOST FIREARMS LLC, d/b/a GRID
DEFENSE and GHOSTRIFLES.COM;

JUGGERNAUT TACTICAL INC., d/b/a
JTACTICAL.COM;

MFY TECHNICAL SOLUTIONS LLC, d/b/a
5DTACTICAL.COM;

TACTICAL GEAR HEADS LLC, d/b/a 80-
LOWER.COM; AR-

Case No. 30-2019-01111797-CU-PO-CJC

*Assigned for all purposes to the Honorable
Gregory H. Lewis*

**DEFENDANTS' UNOPPOSED EX
PARTE APPLICATION TO SET A
CASE MANAGEMENT CONFERENCE
AND STAY PROCEEDINGS**

Hearing Date: October 29, 2020

Hearing Time: 9:00 a.m.

Department: C26

via appearance

by Court Call only

1 15LOWERRECEIVERS.COM; and
2 80LOWERJIG.COM;

3 JAMES TROMBLEE, JR., d/b/a
4 USPATRIOTARMORY.COM;

5 INDUSTRY ARMAMENT INC., d/b/a
6 AMERICANWEAPONSCOMPONENTS.COM;

7 THUNDER GUNS LLC, d/b/a
8 THUNDERTACTICAL.COM;

9 DOES 1-100, Inclusive,
10 Defendants.

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

14 PLEASE TAKE NOTICE that on October 29, 2020 at 9:00 a.m. in Department C26 of the
15 Superior Court for the County of Orange located at 700 West Civic Center Drive, Santa Ana,
16 California 92701, Defendants Ghost Firearms, LLC, Thunder Guns, LLC, Ryan Beezley and Bob
17 Beezley, and MFY Technical Solutions, LLC (“Defendants”) will move for an order to stay
18 proceedings in this action pending the Court’s setting of a case management conference.

19 This application is made pursuant to California Rule of Court 3.1200, et seq., California
20 Rule of Court 3.723, Orange County Local Rules 359 and 388, and relevant precedent, and is
21 based on the accompanying Memorandum of Points and Authorities, the supporting declaration of
22 Sean A. Brady, and upon such further evidence and argument as may be presented before or at the
23 time of the hearing on the ex parte application. This is the first ex parte application filed by
24 Defendants in this matter.

25 On October 26, 2020, Sean A. Brady, conferred telephonically with Ben Rosenfeld,
26 counsel for Plaintiff Francisco Cardenas, providing notice of Defendants’ intention to file this
27 application and asking them if they would oppose it. (Decl. of Sean A. Brady Supp. Ex Parte
28 Appn. (“Brady Decl.”).) He confirmed that Plaintiff does not oppose staying proceedings in this

1 action pending the Court's setting of a case management conference.

2
3 Dated: October 28, 2020

MICHEL & ASSOCIATES, P.C.

4
5 s/ Sean A. Brady

Sean A. Brady

Attorneys for Defendants

Ghost Firearms, LLC, Thunder Guns, LLC,

Ryan Beezley and Bob Beezley,

and MFY Technical Solutions, LLC

STATE OF CALIFORNIA
COUNTY OF ORANGE

On October 28, 2020, I served the foregoing document(s) described as:

on the interested parties in this action by placing
☐ the original
☒ a true and correct copy
thereof by the following means, addressed as follows:

Ben Rosenfeld
115 ½ Bartlett Street
San Francisco, CA 94110
ben.rosenfeld@comcast.net

Executed on October 28, 2020, at Long Beach, California.


Laura Palmerin