Electronically Filed by Superior Court of California, County of Orange, 10/28/2020 01:57:00 PM. 30-2019-01 111797-CU-PO-CJC - ROA # 60 - DAVID H. YAMASAKI, Clerk of the Court By Amy Van Arkel, Deputy Clerk

1	C.D. Michel – SBN 144258 Sean A. Brady – SBN 262007	
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3	Long Beach, CA 90802	
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5	Email: sbrady@michellawyers.com	
6	Attorneys for Defendants Ghost Firearms, LLC, Thunder Guns, LLC,	
7	Ryan Beezley and Bob Beezley, and MFY Technical Solutions, LLC	
8	IN THE SUPERIOR COURT OF T	THE STATE OF CALIFORNIA
9	FOR THE COUNT	
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11	FRANCISCO GUDINO CARDENAS, an individual,	Case No. 30-2019-01111797-CU-PO-CJC
12	Plaintiff,	Assigned for all purposes to the Honorable Gregory H. Lewis
13	V.	DEFENDANTS' UNOPPOSED EX PARTE APPLICATION TO SET A
14	GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET;	CASE MANAGEMENT CONFERENCE AND STAY PROCEEDINGS
15	DEFENSE DISTRIBUTED d/b/a	Hearing Date: October 29, 2020
16	GHOSTGUNNER.NET	Hearing Time: 9:00 a.m. Department: C26 via appearance
17	CODY WILSON d/b/a GHOSTGUNNER.NET	by Court Call only
18 19	BLACKHAWK MANUFACTURING GROUP INC., d/b/a 80PERCENTARMS.COM;	
20	RYAN BEEZLEY and BOB BEEZLEY, d/b/a RBTACTICALTOOLING.COM;	
21	GHOST AMERICA LLC, d/b/a GHOSTGUNS.COM;	
22 23	GHOST FIREARMS LLC, d/b/a GRID DEFENSE and GHOSTRIFLES.COM;	
24	JUGGERNAUT TACTICAL INC., d/b/a	
25	JTACTICAL.COM;	
26 27	MFY TECHNICAL SOLUTIONS LLC, d/b/a 5DTACTICAL.COM;	
28	TACTICAL GEAR HEADS LLC, d/b/a 80- LOWER.COM; AR-	
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EX PARTE APP. TO SET A CASE MANAGEMENT CONFERENCE AND STAY CASE

1 15LOWERRECEIVERS.COM; and 80LOWERJIG.COM; 2 JAMES TROMBLEE, JR., d/b/a 3 USPATRIOTARMORY.COM: 4 INDUSTRY ARMAMENT INC., d/b/a 5 AMERICANWEAPONSCOMPONENTS.COM; 6 THUNDER GUNS LLC, d/b/a THUNDERTACTICAL.COM; 7 DOES 1-100. Inclusive. 8 Defendants. 9 10

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

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

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

On October 26, 2020, Sean A. Brady, conferred telephonically with Ben Rosenfeld,
counsel for Plaintiff Francisco Cardenas, providing notice of Defendants' intention to file this
application and asking them if they would oppose it. (Decl. of Sean A. Brady Supp. Ex Parte
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.
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5		<u>s/ Sean A. Brady</u> Sean A. Brady
6		Attorneys for Defendants Ghost Firearms, LLC, Thunder Guns, LLC,
7		Attorneys for Defendants Ghost Firearms, LLC, Thunder Guns, LLC, Ryan Beezley and Bob Beezley, and MFY Technical Solutions, LLC
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	EX PARTE APP. TO SET A CA	SE MANAGEMENT CONFERENCE AND STAY CASE

^	PROOF OF SERVICE STATE OF CALIFORNIA COUNTY OF ORANGE	
^		
3	I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County,	
	California. I am over the age eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.	
6	On October 28, 2020, I served the foregoing document(s) described as:	
7	DEFENDANTS' UNOPPOSED EX PARTE APPLICATION TO SET A CASE MANAGEMENT CONFERENCE AND STAY PROCEEDINGS	
8	on the interacted parties in this action by placing	
9	on the interested parties in this action by placing [] the original	
10	[X] a true and correct copy thereof by the following means, addressed as follows:	
11	Gerald B. Singleton	
12	Singleton Law Firm 450 A Street, 5th Floor	
13	San Diego, CA 92101 gerald@SLFfirm.com	
	Ben Rosenfeld	
15	115 ¹ / ₂ Bartlett Street San Francisco, CA 94110	
16	ben.rosenfeld@comcast.net	
17	Attorneys for Plaintiff	
18		
19	X (<u>BY ELECTRONIC MAIL</u>) As follows: I served a true and correct copy by electronic transmission through One Legal. Said transmission was reported and completed without error.	
20		
21	X (<u>STATE</u>) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.	
22	Executed on October 28, 2020, at Long Beach, California.	
23	fain falie	
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25	Laura Palmerin	
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27		
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