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9 Attorneys for Plaintiff
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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SAN BERNARDINO
13

14 FRANCISCO GUDINO CARDENAS,

15 Plaintiff,

16 v.

17 GHOST GUNNER INC., d/b/a
18 GHOSTGUNNER.NET; et al.,

19 Defendants.
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Case No. CIVDS1935422

PLAINTIFF'S NOTICE OF NON-
OPPOSITION TO DEFENDANTS'
MOTION TO PERMIT FILING OF
PETITION FOR COORDINATION OR, IN
THE ALTERNATIVE, TO TRANSFER
AND CONSOLIDATE ACTIONS

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**


2 **PLEASE TAKE NOTICE:** Plaintiff does not oppose defendants' pending Motion to
3 Permit Filing of Petition for Coordination or, in the Alternative, to Transfer and Consolidate
4 Actions, filed in this Court on or about October 28, 2020, and agrees that coordination and or
5 consolidation of the *Cardenas* and *McFadyen*¹ matters in this Court is proper because it will
6 promote the ends of justice under Code of Civil Procedure § 404.1 and promote efficiency.

7 Despite the initial designation on the Civil Case cover sheet in this matter, plaintiffs also
8 agree that the matter is complex under California Rule of Court 3.400 due to the large number of
9 defendants, large number of plaintiffs (upon coordination/consolidation), and the potential
10 number of witnesses to present and volume of evidence to process.

11 Therefore, plaintiff respectfully requests that this Court also enter the proposed order and
12 consolidate this matter with *Troy McFadyen, et al v. Ghost Gunner, Inc., et al*, Case No.
13 CIVDS 1935422 and designate the consolidated matter on the complex docket in the Superior
14 Court of Orange County.

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16 Dated: November 19, 2020

BEN ROSENFELD, ATTORNEY
SINGLETON LAW FIRM

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19 By: _____
20 BEN ROSENFELD
21 Attorney for Plaintiff
22 Francisco Gudino Cardenas
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28 ¹ *Troy McFadyen, et al. v. Ghost Gunner, Inc., et al.*, Case No. CIVDS 1935422 (San
Bernadino County Superior Court).

1 PROOF OF SERVICE

2 *Cardenas v. Ghost Gunner Inc. et al.*

3 Case No. 30-2019-01111797-CU-PO-CJC (Orange County Superior Court)

4 I, the undersigned, hereby declare and state that I am over the age of 18, employed in the
5 City of San Francisco, California, and not a party to the within action. My business address is
6 115 ½ Bartlett Street, San Francisco, CA 94110.

7 On the date set forth below, I caused or will cause the following document(s)

8 PLAINTIFF'S NOTICE OF NON-OPPOSITION TO DEFENDANTS' MOTION
9 TO PERMIT FILING OF PETITION FOR COORDINATION OR, IN THE
ALTERNATIVE, TO TRANSFER AND CONSOLIDATE ACTIONS

10 to be served via the following methods, on the following recipients:

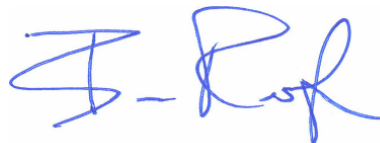
11 ☒ Email (due to Covid19 pandemic)
12 ☐ U.S.P.S. First Class or Priority Mail
13 ☐ U.S.P.S. Express Mail
14 ☐ Personal Delivery
15 ☐ Facsimile

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26 I declare under penalty of perjury under the laws of the State of California that the
27 foregoing is true and correct. Executed on November 19, 2020, at San Francisco, California.
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Ben Rosenfeld, Attorney