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9 Attorneys for Plaintiff
Francisco Gudino Cardenas

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 COUNTY OF SAN BERNARDINO

14 FRANCISCO GUDINO CARDENAS,

15 Plaintiff,

16 v.

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

19 Defendants.

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

PLAINTIFF CARDENAS' NOTICE OF
NON-OPPOSITION BY PLAINTIFFS IN
THE PROSPECTIVE CONSOLIDATED
CASE OF *MCFADYEN V. GHOST
GUNNER INC.*, 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:** In addition to Plaintiff Cardenas' non-opposition to
3 defendants' pending Motion to Permit Filing of Petition for Coordination or, in the Alternative, to
4 Transfer and Consolidate Actions, filed in this Court on or about October 28, 2020,¹ plaintiff
5 aware of, and attaches hereto, plaintiffs' non-opposition in the other case sought to be
6 consolidated in Orange County with this one, namely, *Troy McFadyen, et al v. Ghost Gunner,*
7 *Inc., et al*, Case No. CIVDS1935422 (San Bernadino County Superior Court).

8 Exhibit A hereto is a true and correct copy of the San Bernadino plaintiffs' non-opposition
9 to defendants' motion, as filed in the San Bernadino County Superior Court.

10
11 Dated: November 23, 2020

BEN ROSENFELD, ATTORNEY
SINGLETON LAW FIRM

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13 By: _____



14 BEN ROSENFELD
15 Attorney for Plaintiff
16 Francisco Gudino Cardenas

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27 ¹ In Plaintiff Cardenas' own statement of non-opposition, filed on or about November 19,
28 2020, plaintiff's undersigned counsel inadvertently captioned that filing with the wrong case
 number, i.e. the case number of the San Bernadino County case number. The correct case
 number is the one which appears here, 30-2019-01111797-CU-PO-CJC.

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 CARDENAS' NOTICE OF NON-OPPOSITION BY PLAINTIFFS IN
9 THE PROSPECTIVE CONSOLIDATED CASE OF *MCFADYEN V. GHOST GUNNER*
10 *INC.*, TO DEFENDANTS' MOTION TO PERMIT FILING OF PETITION FOR
COORDINATION OR, IN THE ALTERNATIVE, TO TRANSFER AND
CONSOLIDATE ACTIONS

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

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


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23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct. Executed on November 23, 2020, at San Francisco, California.

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27 Ben Rosenfeld, Attorney
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EXHIBIT A

1 DOUGLAS MUDFORD (STATE BAR NO. 156392)
2 ESTEE LEWIS (STATE BAR NO. 268358)
3 CATIE BARR (STATE BAR NO. 295538)
4 BRANDON STORMENT (STATE BAR NO. 267260)
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10 Attorneys for Plaintiffs

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

Troy McFadyen; et al.,

Plaintiffs,

v.

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

Defendants.

Case No. CIVDS1935422

**[CORRECTED] 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 ATTORNEYS OF RECORD: Plaintiffs
2 do not oppose and, in fact, agree with counsel that coordination of the *Cardenas* and *McFadyen*
3 matters is proper because it will promote the ends of justice under Code of Civil Procedure § 404.1
4 and promote efficiency among the matters. Despite the initial designation on the Civil Case cover
5 sheet for this matter, we also agree the matter is complex under California Rule of Court 3.400 due
6 to the large number of defendants, large number of plaintiffs, and the potential amount of witnesses
7 and evidence to sort through.

8 Therefore, Plaintiffs respectfully request that this court enter the proposed order without
9 delay to consolidate this matter with *Francisco Gudino Cardenas, et al v. Ghost Gunner, Inc., et*
10 *al*, Case No.30-2019-01111797-CU-PO-CJC and designate the consolidated matter for the complex
11 docket in the Superior Court of Orange County. Plaintiffs currently have an upcoming CMC in the
12 *McFayden* matter on December 4, 2020. In order to not waste court resources and time, we would
13 appreciate approving the consolidation and transfer as soon as possible.

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15 Dated: November 23, 2020

BRANDON STORMENT
Barr & Mudford LLP

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17
18 By: 

BRANDON STORMENT
Attorneys for Plaintiffs