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Attorneys for Plaintiffs

IN THE SUPERIOR COURT OF CALIFORNIA

IN THE COUNTY OF SAN BERNARDINO

TROY MCFADYEN, in his Individual
Capacity, and as Heir at Law and Successor
in Interest to MICHELLE MCFADYEN,
Deceased;

PHILLIP BOW and
SIA BOW, as Heirs at Law and Successors
in Interest to MICHELLE MCFADYEN,
Deceased;

BOB STEELE, a Dependent Adult, by and
through his Guardian ad Litem, DAVID STEELE,
Heir at Law and Successor in
Interest to DIANA STEELE, Deceased;

MICHAEL ELLIOTT, Heir at Law and
Successor in Interest to DANIEL LEE
ELLIOT II, Deceased, and
DIANA STEELE, Deceased;

G.E., a Minor, by and through his Guardian ad
Litem, ALMA FEITELBERG, Heir at Law
and Successor in Interest to DANIEL LEE
ELLIOT II, Deceased, and
DIANA STEELE, Deceased;

M.E., a Minor, by and through her Guardian ad
Litem, LATISHA CORNWALL, Heir at Law
and Successor in Interest to DANIEL LEE
ELLIOT II, Deceased, and
DIANA STEELE, Deceased;

No. CIV-DS1935422

**[PROPOSED] ORDER RE
APPLICATION TO SERVE
DEFENDANT GHOST AMERICA
LLC, d/b/a GHOSTGUNS.COM BY
DELIVERY TO THE SECRETARY
OF STATE (Cal. Corp. Code
§17701.16(c)&(d))**

1 MARCIA MCHUGH, Heir at Law and Successor
2 in Interest to JOSEPH MCHUGH, Deceased;

3 GRACE MCHUGH, Heir at Law and Successor
4 in Interest to JOSEPH MCHUGH, Deceased;

5 A.H., a Minor, by and through his Guardian ad
6 Litem, MARIA MONROY;

7 TIFFANY PHOMMATHEP;

8 JOHN PHOMMATHEP SR.;

9 J.P. II, a Minor, by and through his Guardian
10 ad Litem, TIFFANY PHOMMATHEP;

11 J.P., a Minor, by and through his Guardian
12 ad Litem, TIFFANY PHOMMATHEP;

13 N.P, a Minor, by and through his Guardian
14 ad Litem, TIFFANY PHOMMATHEP;

15 JAMES WOODS, JR.; and

16 JAMES WOODS, SR.

17 Plaintiffs,

18 vs.

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

21 DEFENSE DISTRIBUTED d/b/a
22 GHOSTGUNNER.NET

23 CODY WILSON d/b/a GHOSTGUNNER.NET

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

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

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

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

1 JUGGERNAUT TACTICAL INC., d/b/a
2 JTACTICAL.COM;
3 MFY TECHNICAL SOLUTIONS LLC, d/b/a
4 5DTACTICAL.COM;
5 TACTICAL GEAR HEADS LLC, d/b/a 80-
6 LOWER.COM; AR-
7 15LOWERRECEIVERS.COM; and
8 80LOWERJIG.COM;
9 JAMES TROMBLEE, JR., d/b/a
10 USPATRIOTARMORY.COM;
11 INDUSTRY ARMAMENT INC., d/b/a
12 AMERICANWEAPONSCOMPONENTS.COM;
13 THUNDER GUNS LLC, d/b/a
14 THUNDERTACTICAL.COM;
15 DOES 1-100, Inclusive,
16
17 Defendants.

18 The Court having considered the application and good cause appearing, IT IS
19
20 **ORDERED:**

21 1. That the plaintiffs' claim be personally delivered to the Secretary of State and service
22 accepted on behalf of defendant Ghost America LLC dba Ghostguns.com, an LLC that has been
23 doing business in the State of California and whose designated agent for service of process
24 cannot, with reasonable diligence, be found at the address designated for personal delivery of the
25 process. (Cal. Corp. Code §17701.16(c)).

26 2. Upon receipt of the copy of process and the fee therefor, the California Secretary of
27 State shall give notice of the service of the process to defendant Ghost America LLC dba
28 Ghostguns.com at its principal office by forwarding to that office, by registered mail with request
for return receipt, the copy of the process. (Cal. Corp. Code §17701.16(d)).

Date: _____, 2020

THE HONORABLE DAVID COHN
Judge of the Superior Court

PROOF OF SERVICE

I am a citizen of the United States and a resident of the County of Shasta, State of California. I am over the age of 18 years and not a party to the within action; my business mailing address is Post Office Box 994390, Redding, California 96099-4390. I am familiar with this firm's practice whereby the mail, after being placed in a designated area, is given the appropriate postage and is deposited in a U.S. mailbox after the close of the day's business.

XX On the date indicated below, I served the document(s) designated below on all parties in said action by placing a true copy thereof in a sealed envelope in the designated area for outgoing mail addressed as set forth below:

_____ On the date indicated below, I served the document(s) designated below on all parties in said action by placing a true copy thereof in a sealed envelope and mailed it via overnight mail with Federal Express addressed as set forth below:

_____ On the date indicated below, I personally served the document(s) designated below by transmitting a true copy thereof via electronic mail in .pdf format as an e-mail attachment to each addressee set forth below:

_____ On the date indicated below, I served the document(s) designated below by transmitting a true copy thereof via Fax to the person(s) and at the Fax number(s) set forth below:

**[PROPOSED] ORDER RE APPLICATION TO SERVE DEFENDANT
GHOST AMERICA LLC, d/b/a GHOSTGUNS.COM BY DELIVERY
TO THE SECRETARY OF STATE (Cal. Corp. Code § 17701.16(c))**

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TACTICAL, INC.*

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(VIA REGULAR MAIL ONLY)*

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*Attorneys for Defendants, Ryan Beezley and
Bob Beezley (R & B Tool Supply)
dba RBTACTICIALTOOLING.COM*

1 I declare under penalty of perjury, under the laws of the State of California, that the
2 foregoing is true and correct. Executed September 22, 2020, at Redding, California.

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