

1 Craig A. Livingston – SBN 148551
 2 Crystal L. Van Der Putten – SBN 227262
 3 LIVINGSTON LAW FIRM
 4 A Professional Corporation
 5 1600 South Main Street, Suite 280
 6 Walnut Creek, CA 94596
 7 Tel: (925) 952-9880
 8 Fax: (925) 952-9881
 9 Email: clivingston@livingstonlawyers.com
 10 cvanderputten@livingstonlawyers.com

11 Attorneys for Defendant
 12 TACTICAL GEAR HEADS LLC

13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25
 26
 27
 28

SUPERIOR COURT OF CALIFORNIA
 COUNTY OF SAN BERNARDINO - UNLIMITED CIVIL

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

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

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

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

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

28 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;

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

FILED
 SUPERIOR COURT OF CALIFORNIA
 COUNTY OF SAN BERNARDINO
 SAN BERNARDINO DISTRICT

NOV 03 2020

BY Jovanna Leonoro
 JOVANNA LEONORO, DEPUTY

Case No. CIV-DS1935422

ASSIGNED TO HON. DAVID COHN IN
 DEPT. S-26

**NOTICE OF SPECIAL APPEARANCE
 BY DEFENDANT TACTICAL GEAR
 HEADS LLC**

Complaint Filed: 11/14/2019
 Trial Date: None

1
2 GRACE MCHUGH, Heir at Law and Successor
3 in Interest to JOSEPH MCHUGH, Deceased;
4 A.H., a Minor, by and through his Guardian ad
5 Litem, MARIA MONROY;
6 TIFFANY PHOMMATHEP;
7 JOHN PHOMMATHEP SR.;
8 J.P. II, a Minor, by and through his Guardian ad
9 Litem, TIFFANY PHOMMATHEP;
10 J.P., a Minor, by and through his Guardian ad
11 Litem, TIFFANYPHOMMATHEP;
12 N.P., a Minor, by and through his Guardian ad
13 Litem, TIFFANYPHOMMATHEP;
14 JAMES WOODS, JR.; and JAMES WOODS,
15 SR.

16 Plaintiffs,

17 v.

18 GHOST GUNNER INC., d/b/a
19 GHOSTGUNNER.NET;
20 DEFENSE DISTRIBUTED d/b/a
21 GHOSTGUNNER.NET
22 CODY WILSON d/b/a GHOSTGUNNER.NET
23 BLACKHAWK MANUFACTURING GROUP
24 INC., d/b/a 80PERCENTARMS.COM;
25 RYAN BEEZLEY and BOB BEEZLEY, d/b/a
26 RBTACTICALTOOLING.COM;
27 GHOST AMERICA LLC, d/b/a
28 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-

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.

11 **TO THE COURT AND TO ALL COUNSEL OF RECORD:**

12 **PLEASE TAKE NOTICE** that defendant TACTICAL GEAR HEADS LLC hereby
 13 specially appears by and through its counsel of record, Craig A. Livingston and Crystal L. Van
 14 Der Putten, in the above-captioned action as directed by Initial Case Management Conference
 15 Order filed November 26, 2019, which provides the filing of this notice is without prejudice to
 16 defendant filing a jurisdictional, procedural or substantive challenge to the operative Complaint.

17 Please direct all pleadings, notices, correspondence or any other document to
 18 TACTICAL GEAR HEADS LLC's counsel of record as follows:

19 Craig A. Livingston
 20 Crystal L. Van Der Putten
 21 Livingston Law Firm, P.C.
 22 1600 South Main Street, Suite 280
 23 Walnut Creek, CA 94596-8818
 24 Phone: (925) 952-9880
 25 Facsimile: (925) 952-9881
 26 Email: clivingston@livingstonlawyers.com
 27 Email: cvanderputten@livingstonlawyers.com

28 Dated: November 2, 2020.

LIVINGSTON LAW FIRM

Craig A. Livingston

By

Craig A. Livingston
 Crystal L. Van Der Putten
 Attorneys for Defendant
 TACTICAL GEAR HEADS LLC

PROOF OF SERVICE

I, the undersigned, hereby declare that I am over the age of eighteen years and not a party to the within action. My business address is 1600 South Main Street, Suite 280, Walnut Creek, California 94596. On the date set forth below, I served the following document(s):

NOTICE OF SPECIAL APPEARANCE BY DEFENDANT TACTICAL GEAR HEADS LLC

upon the following at the address(es) stated below:

Douglas S. Mudford, Esq.

Estee Lewis, Esq.

Catie T. Barr, Esq.

Brandon Storment, Esq.

BARR & MUDFORD

1824 Court Street

Redding, CA 96001-1825

Tel: (530) 243-8008

Fax: (530) 243-1678

Email: douglas@ca-lawyer.com

Email: estee@ca-lawyer.com

Email: catie@ca-lawyer.com

Email: brandon@ca-lawyer.com

Craig J. Mariam, Esq.

John P. Cogger, Esq.

Sebastian M. Van Roundsburg

GORDON REES SCULLY MANSUKHANI, LLP

633 West Fifth St., 52nd Floor

Los Angeles, CA 90071

Tel: (213) 576-5000

Fax: (877) 306-0043

Email: cmariam@grsm.com

Email: jcogger@grsm.com

Email: sroundsburg@grsm.com

Attorneys for Plaintiffs Troy McFadyen et al.

Attorneys for Defendant

Juggernaut Tactical, Inc.

Christopher Renzulli

(Pro Hac Vice To Be Filed)

Howard B. Schilsky

(Pro Hac Vice To Be Filed)

RENZULLI LAW FIRM, LLP

One North Broadway, Ste. 1005

White Plains, NY 10601

Tel: (914) 285-0700

Fax: (914) 285-1213

Email: crenzulli@renzullilaw.com

Email: hschlisky@renzullilaw.com

Attorneys for Defendant

Juggernaut Tactical, Inc.

Service was accomplished as follows:

1 **X BY US MAIL, According to Normal Business Practices.** At my place of business at
2 the above address, I sealed the above document(s) in an envelope addressed to the
3 above, and I placed that sealed envelope for collection and mailing following ordinary
4 business practices, for deposit with the U.S. Postal Service. I am readily familiar with
5 the business practice at my place of business for the collection and processing of
6 correspondence for mailing with the U.S. Postal Service. Correspondence so collected
7 and processed is deposited with the U.S. Postal Service the same day in the ordinary
8 course of business, postage fully prepaid.

9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct, and that this declaration was executed on November 2, 2020, at
11 Walnut Creek, California.

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Tracey Nguyen