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9 *Attorneys for Defendants*  
10 *Blackhawk Manufacturing Group, Inc.;*  
11 *Ryan Beezley and Bob Beezley; Ghost*  
12 *Firearms, LLC; MFY Technical*  
13 *Solutions, LLC; and Thunder Guns, LLC*

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

NOV 10 2020

BY

  
DEBRA PEDROSA, DEPUTY

8  
9 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **FOR THE COUNTY OF SAN BERNARDINO**

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 ELLIOTT  
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 ELLIOTT  
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  
ELLIOTT II, Deceased, and DIANA STEELE,  
Deceased;

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

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

A.H., a Minor, by and through his Guardian ad

Case No. CIV DS 1935422

*Assigned for all purposes to the Honorable  
Judge David Cohn; Dept. S-26*

**NOTICE OF GENERAL  
APPEARANCE OF DEFENDANT  
BLACKHAWK MANUFACTURING  
GROUP, INC.**

**BY FAX**

Complaint Filed: November 14, 2019

By Fax

1 Litem, MARIA MONROY;  
2 TIFFANY PHOMMATHEP;  
3 JOHN PHOMMATHEP SR.;  
4 J.P. II, a Minor, by and through his Guardian ad  
Litem, TIFFANY PHOMMATHEP;  
5 J.P., a Minor, by and through his Guardian ad  
6 Litem, TIFFANY PHOMMATHEP;  
7 N.P., a Minor, by and through his Guardian ad  
Litem, TIFFANY PHOMMATHEP;  
8 JAMES WOODS, JR.; and  
9 JAMES WOODS, SR.,  
10  
11 Plaintiffs,  
12  
13 vs.  
14 GHOST GUNNER INC., d/b/a  
GHOSTGUNNER.NET;  
15 DEFENSE DISTRIBUTED d/b/a  
GHOSTGUNNER.NET  
16 CODY WILSON d/b/a GHOSTGUNNER.NET  
17 BLACKHAWK MANUFACTURING GROUP  
INC., d/b/a 80PERCENTARMS.COM;  
18 RYAN BEEZLEY and BOB BEEZLEY, d/b/a  
RBTACTICALTOOLING.COM;  
19 GHOST AMERICA LLC, d/b/a  
GHOSTGUNS.COM;  
20 GHOST FIREARMS LLC, d/b/a GRID  
DEFENSE and GHOSTRIFLES.COM;  
21 JUGGERNAUT TACTICAL INC., d/b/a  
JTACTICAL.COM;  
22 MFY TECHNICAL SOLUTIONS LLC, d/b/a  
5DTACTICAL.COM;  
23 TACTICAL GEAR HEADS LLC, d/b/a 80-  
24 LOWER.COM; AR-  
25 15LOWERRECEIVERS.COM; and  
26 80LOWERJIG.COM;  
27  
28

1 JAMES TROMBLEE, JR., d/b/a  
2 USPATRIOTARMORY.COM;

3 INDUSTRY ARMAMENT INC., d/b/a  
4 AMERICANWEAPONSCOMPONENTS.COM;

5 THUNDER GUNS LLC, d/b/a  
6 THUNDERTACTICAL.COM;

7 DOES 1-100, Inclusive,

8 Defendants.

9  
10  
11  
12 TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

13 PLEASE TAKE NOTICE that Defendant Blackhawk Manufacturing Group, Inc. hereby  
14 enters its notice of general appearance by and through its counsel of record, Sean A. Brady, in the  
15 above-captioned action as directed by the Initial Case Management Conference Order issued  
16 November 26, 2019, which provides the filing of this notice is without prejudice to any  
17 substantive or procedural challenges to the Complaint, including subject matter jurisdiction,  
18 without prejudice to any denial or affirmative defense, and without prejudice to the filing of any  
19 cross-complaint.  
20

21 Dated: November 10, 2020

**MICHEL & ASSOCIATES, P.C.**

22  
23 

24 Sean A. Brady  
25 *Attorneys for Defendants*  
26 *Blackhawk Manufacturing Group, Inc.;*  
27 *Ryan Beezley and Bob Beezley; Ghost*  
28 *Firearms, LLC; MFY Technical*  
*Solutions, LLC; and Thunder Guns, LLC*

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA  
3 COUNTY OF SAN BERNARDINO

4 I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County,  
5 California. I am over the age eighteen (18) years and am not a party to the within action. My  
6 business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

7 On November 10, 2020, I served the foregoing document(s) described as:

8 **NOTICE OF GENERAL APPEARANCE OF DEFENDANT BLACKHAWK**  
9 **MANUFACTURING GROUP, INC.**

10 on the interested parties in this action by placing  
11 [ ] the original  
12 [X] a true and correct copy  
13 thereof by the following means, addressed as follows:

14 Please see Attached Service List.

15 X (BY FAX TRANSMISSION) I faxed the document(s) to the person(s) at the fax  
16 number(s) listed below. No error was reported by the fax machine that I used.

17 X (BY MAIL) As follows: I am "readily familiar" with the firm's practice of collection and  
18 processing correspondence for mailing. Under the practice it would be deposited with the  
19 U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach,  
20 California, in the ordinary course of business. I am aware that on motion of the party  
21 served, service is presumed invalid if postal cancellation date is more than one day after  
22 date of deposit for mailing an affidavit.

23 X (STATE) I declare under penalty of perjury under the laws of the State of California that  
24 the foregoing is true and correct.

25 Executed on November 10, 2020, at Long Beach, California.

26   
27 Laura Palmerin

**SERVICE LIST**

Dugan Barr  
Douglas Mudford

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Sean A. Brady (SBN: 262007)</b> <b>Michel &amp; Associates, P.C.</b> <b>180 East Ocean Blvd., Suite 200</b> <b>Long Beach, CA 90802</b> TELEPHONE NO.: <b>(562) 216-4444</b> FAX NO. (Optional): <b>(562) 216-4445</b> E-MAIL ADDRESS (Optional): <b>sbrady@michellawyers.com</b> ATTORNEY FOR (Name): <b>Blackhawk Manufacturing Group, Inc., Ryan Beezley, Bob Beezley, Ghost Firearms, I.L.C. MFY Technical Solutions, I.L.C. Thunder Guns, I.L.C.</b>	FOR COURT USE ONLY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO</b> STREET ADDRESS: <b>247 West Third Street</b> MAILING ADDRESS: <b>247 West Third Street</b> CITY AND ZIP CODE: <b>San Bernardino, 92415-0210</b> BRANCH NAME: <b>San Bernardino District – Civil Division</b>	
PLAINTIFF/PETITIONER: <b>Troy McFadyen, et al.</b> DEFENDANT/RESPONDENT: <b>Ghost Gunner, Inc., et al.</b>	
<b>FACSIMILE TRANSMISSION COVER SHEET</b>	CASE NUMBER: <b>CIV DS 1935422</b>

## TO THE COURT:

1. **Please file** the following transmitted documents in the order listed below:

<u>Document name</u>	<u>No. of pages</u>
Notice of General Appearance of Defendant Blackhawk Manufacturing Group, Inc.	5

2. ☐ **Processing instructions** consisting of: \_\_\_\_\_ pages are also transmitted.

3. ☒ **Fee required** ☒ Filing fee ☒ Fax fee (Cal. Rules of Court, rule 10.815)

- a. ☐ **Credit card payment** I authorize the above fees and any amount imposed by the card issuer or draft purchaser to be charged to the following account:

☒ VISA ☐ MASTERCARD Account No.: 4259072049051179 Expiration date: 08/24

C.D. Michel

(TYPE OR PRINT NAME OF CARDHOLDER)



(SIGNATURE OF CARDHOLDER)

- b. ☐ **Attorney account** (Cal. Rules of Court, rule 2.304). Please charge my account no.: