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

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

Case No. CIV DS 1935422

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

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

**NOTICE OF GENERAL  
APPEARANCE OF DEFENDANT BOB  
BEEZLEY**

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

**BY FAX**

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

Complaint Filed: November 14, 2019

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

27 M.E., a Minor, by and through her Guardian ad  
28 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

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 Bob Beezley hereby enters his notice of general  
14 appearance by and through his counsel of record, Sean A. Brady, in the above-captioned action as  
15 directed by the Initial Case Management Conference Order issued November 26, 2019, which  
16 provides the filing of this notice is without prejudice to any substantive or procedural challenges  
17 to the Complaint, including subject matter jurisdiction, without prejudice to any denial or  
18 affirmative defense, and without prejudice to the filing of any cross-complaint.

19  
20 Dated: November 10, 2020

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

21   
22

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

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

13 Please see Attached Service List.

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

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

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

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

25 

26 Laura Palmerin

**SERVICE LIST**

Dugan Barr

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