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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 SPECIAL APPEARANCE
OF DEFENDANT GHOST FIREARMS,
LLC**

BY FAX

Complaint Filed: November 14, 2019

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
15 GHOSTGUNNER.NET;
16 DEFENSE DISTRIBUTED d/b/a
17 GHOSTGUNNER.NET
18 CODY WILSON d/b/a GHOSTGUNNER.NET
19 BLACKHAWK MANUFACTURING GROUP
20 INC., d/b/a 80PERCENTARMS.COM;
21 RYAN BEEZLEY and BOB BEEZLEY, d/b/a
22 RBTACTICALTOOLING.COM;
23 GHOST AMERICA LLC, d/b/a
24 GHOSTGUNS.COM;
25 GHOST FIREARMS LLC, d/b/a GRID
26 DEFENSE and GHOSTRIFLES.COM;
27 JUGGERNAUT TACTICAL INC., d/b/a
28 JTACTICAL.COM;
MFY TECHNICAL SOLUTIONS LLC, d/b/a
5DTACTICAL.COM;
TACTICAL GEAR HEADS LLC, d/b/a 80-
LOWER.COM; AR-
15LOWERRECEIVERS.COM; and
80LOWERJIG.COM;

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 Ghost Firearms, LLC hereby enters its notice of
14 special appearance by and through its counsel of record, Sean A. Brady, in the above-captioned
15 action as directed by the Initial Case Management Conference Order issued November 26, 2019,
16 which provides the filing of this notice is without prejudice to personal jurisdiction challenges,
17 without prejudice to any substantive or procedural challenges to the Complaint, including subject
18 matter jurisdiction, without prejudice to any denial or affirmative defense, and without prejudice
19 to the filing of any 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 SPECIAL APPEARANCE OF DEFENDANT GHOST FIREARMS,
9 LLC**

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

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

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 Special Appearance of Defendant Ghost Firearms, LLC	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.: