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Blackhawk Manufacturing Group, Inc.;
Ryan Beezley and Bob Beezley; Ghost
Firearms, LLC; MFY Technical
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

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR 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 ELLIOTT
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 ELLIOTT
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
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 THUNDER GUNS,
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.,
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11 Plaintiffs,
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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.

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

13 PLEASE TAKE NOTICE that Defendant Thunder Guns, 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

STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO

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

on the interested parties in this action by placing
☐ the original
☒ a true and correct copy
thereof by the following means, addressed as follows:

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


Laura Palmerin

SERVICE LIST

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