| 1 | C.D. Michel – SBN 144258 Sean A. Brady – SBN 262007 | | | |
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| 2 | MICHEL & ASSOCIATES, P.C. 180 E. Ocean Blvd., Suite 200 | | | |
| 3 | Long Beach, CA 90802 Telephone: (562) 216-4444 | FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN BERNARDING | | |
| 4 | Facsimile: (562) 216-4445 Email: sbrady@michellawyers.com | SAN BERNARDINO DISTRICT | | |
| 5 | Attorneys for Defendants Blackhawk Manufacturing Group, Inc.; | NOV 1 0 2020 | | |
| 6 | Ryan Beezley and Bob Beezley; Ghost Firearms, LLC; MFY Technical | BY | | |
| 7 | Solutions, LLC; and Thunder Guns, LLC | DEBHA PEDHUSA, DEPUT | | |
| 8 | IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA | | | |
| 9 | FOR THE COUNTY OF | | | |
| 10 | TROY MCFADYEN, in his Individual Capacity, | Case No. CIV DS 1935422 | | |
| 11 | and as Heir at Law and Successor in Interest to | | | |
| 12 | MICHELLE MCFADYEN, Deceased; | Assigned for all purposes to the Honorable Judge David Cohn; Dept. S-26 | | |
| 13 | PHILLIP BOW and SIA BOW, as Heirs at Law and Successors in Interest to MICHELLE | NOTICE OF SPECIAL APPEARANCE | | |
| 14 | MCFADYEN, Deceased; | OF DEFENDANT THUNDER GUNS, LLC | | |
| 15 | BOB STEELE, a Dependent Adult, by and through his Guardian ad Litem, DAVID | DVEAV | | |
| 16 | STEELE, Heir at Law and Successor in Interest to DIANA STEELE, Deceased; | BY FAX | | |
| 17 | MICHAEL ELLIOTT, Heir at Law and Successor in Interest to DANIEL LEE ELLIOTT | Complaint Filed: November 14, 2019 | | |
| 18 | II, Deceased, and DIANA STEELE, Deceased; | | | |
| 19 | G.E., a Minor, by and through his Guardian ad Litem, ALMA FEITELBERG, Heir at Law and | | | |
| 20 | Successor in Interest to DANIEL LEE ELLIOTT II, Deceased, and DIANA STEELE, Deceased; | | | |
| 21 | M.E., a Minor, by and through her Guardian ad | | | |
| 22 | Litem, LATISHA CORNWALL, Heir at Law and Successor in Interest to DANIEL LEE | | | |
| 23 | ELLIOTT II, Deceased, and DIANA STEELE, Deceased; | | | |
| 24 | MARCIA MCHUGH, Heir at Law and | | | |
| 25 | Successor in Interest to JOSEPH MCHUGH, Deceased; | | | |
| 26 | GRACE MCHUGH, Heir at Law and Successor | | | |
| 27 | in Interest to JOSEPH MCHUGH, Deceased; | | | |
| 28 | A.H., a Minor, by and through his Guardian ad | | | |
| | 1 | | | |

| 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 6 | J.P., a Minor, by and through his Guardian ad 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 | Plaintiffs, | |
| 11 | vs. | |
| 12 13 | GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET; | |
| 14 | DEFENSE DISTRIBUTED d/b/a GHOSTGUNNER.NET | |
| 15 | CODY WILSON d/b/a GHOSTGUNNER.NET | |
| 16 17 | BLACKHAWK MANUFACTURING GROUP INC., d/b/a 80PERCENTARMS.COM; | |
| 18 | RYAN BEEZLEY and BOB BEEZLEY, d/b/a RBTACTICALTOOLING.COM; | |
| 19 20 | GHOST AMERICA LLC, d/b/a GHOSTGUNS.COM; | |
| 21 | GHOST FIREARMS LLC, d/b/a GRID DEFENSE and GHOSTRIFLES.COM; | |
| 22 23 | JUGGERNAUT TACTICAL INC., d/b/a JTACTICAL.COM; | |
| 24 25 | MFY TECHNICAL SOLUTIONS LLC, d/b/a | |
| | 5DTACTICAL.COM; | |
| 26 27 | TACTICAL GEAR HEADS LLC, d/b/a 80- LOWER.COM; AR- | |
| 28 | 15LOWERRECEIVERS.COM; and 80LOWERJIG.COM; | |
| | | |
| | 2 | |

JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM; INDUSTRY ARMAMENT INC., d/b/a AMERICANWEAPONSCOMPONENTS.COM; THUNDER GUNS LLC, d/b/a THUNDERTACTICAL.COM; DOES 1-100, Inclusive, Defendants.

TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD: PLEASE TAKE NOTICE that Defendant Thunder Guns, LLC hereby enters its notice of special appearance by and through its counsel of record, Sean A. Brady, in the above-captioned action as directed by the Initial Case Management Conference Order issued November 26, 2019, which provides the filing of this notice is without prejudice to personal jurisdiction challenges, without prejudice to any substantive or procedural challenges to the Complaint, including subject matter jurisdiction, without prejudice to any denial or affirmative defense, and without prejudice

to the filing of any cross-complaint.

Dated: November 10, 2020

MICHEL & ASSOCIATES, P.C.

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

| 1 | PROOF OF SERVICE | | |
|----------|--|--|--|
| 2 | STATE OF CALIFORNIA COUNTY OF SAN BERNARDINO | | |
| 3 | I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County, California. I am over the age eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802. | | |
| 4 5 | | | |
| 6 | On November 10, 2020, I served the foregoing document(s) described as: | | |
| 7 | NOTICE OF SPECIAL APPEARANCE OF DEFENDANT THUNDER GUNS, LLC | | |
| 8 | on the interested parties in this action by placing | | |
| 9 | [] the original | | |
| 10 | [X] a true and correct copy thereof by the following means, addressed as follows: | | |
| 11 | Please see Attached Service List. | | |
| 12 | | | |
| 13 | X (BY FAX TRANSMISSION) I faxed the document(s) to the person(s) at the fax number(s) listed below. No error was reported by the fax machine that I used. | | |
| 14 | | | |
| 15 16 | X (BY MAIL) As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach, | | |
| 17 | California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date is more than one day after date of deposit for mailing an affidavit. | | |
| 18 | | | |
| 19 20 | X (<u>STATE</u>) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. | | |
| 20 | Executed on November 10, 2020, at Long Beach, California. | | |
| 21 | Janafaleire | | |
| 22 | Laura Palmerin | | |
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| 1 | SE | CRVICE LIST | | | |
|----|---|---|--|--|--|
| 2 | Dugan Barr Douglas Mudford | Attorneys for Plaintiffs | | | |
| 3 | <u>doug@ca-lawyer.com</u> Estee Lewis | | | | |
| 4 | estee@ca-lawyer.com Catie Barr | | | | |
| 5 | <u>catie@ca-lawyer.com</u> Brandon Storment | | | | |
| 6 | brandon@barrandmudford.com Barr & Mudford, LLP | | | | |
| 7 | Post Office Box 994390 Redding, CA 96099-4390 | | | | |
| 8 | Fax: (530) 243-1648 | | | | |
| 9 | Craig A. Livingston <u>clivingston@livingstonlawyers.com</u> | Attorneys for Defendant Tactical Gear Heads, LLC | | | |
| 10 | Crystal L. Van Der Putten cvanderputten@livingstonlawyers.com | | | | |
| 11 | LIVINGSTON LAW FIRM A Professional Corporation | | | | |
| 12 | 1600 South Main Street, Suite 280 Walnut Creek, CA 94596 | | | | |
| 13 | Fax: (925) 952-9881 | | | | |
| 14 | Grant D. Waterkotte gwaterkotte@pettitkohn.com | Attorneys for Defendants Defense Distributed and Cody R. Wilson | | | |
| 15 | Justin R. Felton jfelton@pettitkohn.com | unu Couy R. mison | | | |
| 16 | Petit Kohn Ingrassia Lutz & Dolin PC 5901 W. Century Blvd., Suite 1100 | | | | |
| 17 | Los Angeles, CA 90045 Fax: (310) 649-5777 | | | | |
| 18 | Tux. (510) 012 5111 | | | | |
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| | SERVICE LIST | | | | |

MC-005

| 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 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. | FOR COURT USE ONLY |
|---|--------------------------------|
| DEFENDANT/RESPONDENT: Ghost Gunner, Inc., et al. | CASE NUMBER: |
| FACSIMILE TRANSMISSION COVER SHEET | CASE NUMBER: CIV DS 1935422 |

TO THE COURT:

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

Document name Notice of Special Appearance of Defendant Thunder Guns, LLC No. of pages 5

2. Processing instructions consisting of: _____ pages are also transmitted.

3. **r** Fee required **r** Filing fee **r** 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: 08/24anci

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.: