

1 **DOUGLAS MUDFORD** .....State Bar No. 156392  
2 **ESTEE LEWIS** .....State Bar No. 268358  
3 **CATIE BARR** .....State Bar No. 295538  
4 **BRANDON STORMENT** .....State Bar No. 267260

5 **BARR & MUDFORD, LLP**

6 1824 Court Street/Post Office Box 994390

7 Redding, California 96099-4390

8 Telephone: (530) 243-8008

9 Facsimile: (530) 243-1648

10 Attorneys for Plaintiffs

11  
12  
13 **IN THE SUPERIOR COURT OF CALIFORNIA**

14 **IN THE COUNTY OF SAN BERNARDINO**

15 TROY MCFADYEN, in his Individual  
16 Capacity, and as Heir at Law and Successor  
17 in Interest to MICHELLE MCFADYEN,  
18 Deceased;

19 PHILLIP BOW and  
20 SIA BOW, as Heirs at Law and Successors  
21 in Interest to MICHELLE MCFADYEN,  
22 Deceased;

23 BOB STEELE, a Dependent Adult, by and  
24 through his Guardian ad Litem, DAVID STEELE  
25 Heir at Law and Successor in  
26 Interest to DIANA STEELE, Deceased;

27 MICHAEL ELLIOTT, Heir at Law and  
28 Successor in Interest to DANIEL LEE  
ELLIOT 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  
ELLIOT II, Deceased, and  
DIANA STEELE, Deceased;

M.E., a Minor, by and through her Guardian ad  
Litem, LATISHA CORNWALL, Heir at Law

No. CIV-DS1935422

**PLAINTIFFS' FURTHER CASE  
MANAGEMENT CONFERENCE  
STATEMENT**

**Date. : February 10, 2021**

**Time : 9:00 a.m.**

**Dept. : S-26**

**Judge: Hon. David Cohn**

1 and Successor in Interest to DANIEL LEE  
2 ELLIOT II, Deceased, and  
3 DIANA STEELE, Deceased;  
4  
5 MARCIA MCHUGH, Heir at Law and Successor  
6 in Interest to JOSEPH MCHUGH, Deceased;  
7  
8 GRACE MCHUGH, Heir at Law and Successor  
9 in Interest to JOSEPH MCHUGH, Deceased;  
10  
11 A.H., a Minor, by and through his Guardian ad  
12 Litem, MARIA MONROY;  
13  
14 TIFFANY PHOMMATHEP;  
15  
16 JOHN PHOMMATHEP SR.;  
17  
18 J.P. II, a Minor, by and through his Guardian  
19 ad Litem, TIFFANY PHOMMATHEP;  
20  
21 J.P., a Minor, by and through his Guardian  
22 ad Litem, TIFFANY PHOMMATHEP;  
23  
24 N.P, a Minor, by and through his Guardian  
25 ad Litem, TIFFANY PHOMMATHEP;  
26  
27 JAMES WOODS, JR.; and  
28 JAMES WOODS, SR.  
  
Plaintiffs,  
  
vs.  
  
GHOST GUNNER INC., d/b/a  
GHOSTGUNNER.NET;  
  
DEFENSE DISTRIBUTED d/b/a  
GHOSTGUNNER.NET  
  
CODY WILSON d/b/a GHOSTGUNNER.NET  
  
BLACKHAWK MANUFACTURING GROUP  
INC., d/b/a 80PERCENTARMS.COM;  
  
RYAN BEEZLEY and BOB BEEZLEY, d/b/a  
RBTACTICALTOOLING.COM;

1 GHOST AMERICA LLC, d/b/a  
2 GHOSTGUNS.COM;  
3 GHOST FIREARMS LLC, d/b/a GRID  
4 DEFENSE and GHOSTRIFLES.COM;  
5 JUGGERNAUT TACTICAL INC., d/b/a  
6 JTACTICAL.COM;  
7 MFY TECHNICAL SOLUTIONS LLC, d/b/a  
8 5DTACTICAL.COM;  
9 TACTICAL GEAR HEADS LLC, d/b/a 80-  
10 LOWER.COM; AR-  
11 15LOWERRECEIVERS.COM; and  
12 80LOWERJIG.COM;  
13 JAMES TROMBLEE, JR., d/b/a  
14 USPATRIOTARMORY.COM;  
15 INDUSTRY ARMAMENT INC., d/b/a  
16 AMERICANWEAPONSCOMPONENTS.CO  
17 M;  
18 THUNDER GUNS LLC, d/b/a  
19 THUNDERTACTICAL.COM;  
20 DOES 1-100, Inclusive,  
21  
22 Defendants.

23 The plaintiffs hereby submit this Further Case Management Conference Statement:

24 At the previous case management conference on December 4, 2020, it was related to this  
25 Court that a motion seeking coordination had been filed by a group of defendants in a similar  
26 case in Orange County Superior court to be heard on January 25, 2021.<sup>1,2</sup> Here, the Court stayed  
27 our case pending the outcome of coordination in Orange County.

28 At the January 25<sup>th</sup> hearing in Orange County, the trial court judge granted the Motion to  
Permit Filing of Petition for Coordination. Consequently, the defendants can now petition the


<sup>1</sup> *Cardenas vs. Ghost Gunner Inc.*, Orange County case no. 2019-01111797.

1 JCCP for coordination. The Orange County court stayed the case there until the JCCP acted on  
2 the petition.

3 Here, plaintiffs respectfully request the Court similarly stay our case pending a decision  
4 by the JCCP on the issue of coordination.  
5

6  
7 DATED: January 25, 2021

BARR & MUDFORD

8  
9   
10 BRANDON STORMENT  
11 CATIE BARR  
12 ESTEE LEWIS  
13 Attorney for Plaintiffs  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

28 <sup>2</sup> The moving parties could not directly petition the JCCP for coordination because not all  
defendants agreed. (CRC 3.520 and CCP section 404.)

Craig J. Mariam  
John P. Cogger  
Sebastian M. Van Roundsburg  
Gordon Rees Scully Mansukhani, LLP  
633 West Fifth Street, 52<sup>nd</sup> Floor  
Los Angeles, CA 90071  
Email: [cmariam@grsm.com](mailto:cmariam@grsm.com)  
[Jcogger@grsm.com](mailto:Jcogger@grsm.com) and  
[sroundsburg@grsm.com](mailto:sroundsburg@grsm.com)  
Telephone: 213-576-5000  
Facsimile : 877-306-0043  
*Attorneys for Defendant, JUGGERNAUT  
TACTICAL, INC.*

Craig A. Livingston and  
Crystal L. Van Der Putten  
Livingston Law Firm  
1600 South Main Street, Suite 280  
Walnut Creek, CA 94596  
Telephone: 925-952-9880  
Facsimile : 925-952-9881  
[clivingston@livingstonlawyers.com](mailto:clivingston@livingstonlawyers.com)  
[cvanderputten@livingstonlawyers.com](mailto:cvanderputten@livingstonlawyers.com)  
*Attorneys for Defendant,  
TACTICAL GEAR HEADS, LLC*

Sean A. Brady  
C. D. Michel  
Michel & Associates, P.C.  
180 East Ocean Boulevard, Suite 200  
Long Beach, CA 90802  
Email: [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
[lpalmerin@michellawyers.com](mailto:lpalmerin@michellawyers.com)  
Telephone: 562-216-4444  
Facsimile : 562-216-4445  
*Attorneys for Defendants, BLACKHAWK  
MANUFACTURING GROUP, INC.,  
RYAN AND BOB BEEZLEY  
BOB BEEZLEY (R & B TOOL SUPPLY)  
DBA RBTACTICIALTOOLING.COM  
GHOST FIREARMS, LLC; MFY TECHNICAL  
SOLUTIONS, LLC AND THUNDER GUNS, LLC*

Justin R. Felton  
Marie Frandsen  
Pettit Kohn Ingrassia Lutz & Dolin, PC  
5901 West Century Blvd., Suite 1100  
Los Angeles, CA 90045  
Email: [jfelton@pettikohn.com](mailto:jfelton@pettikohn.com)  
[mfrandsen@pettikohn.com](mailto:mfrandsen@pettikohn.com)  
Telephone: 310-649-5772  
Facsimile: 310-649-5777  
*Attorneys for Defendants, DEFENSE  
DISTRIBUTED (ERRONEOUSLY SUED AS  
GHOST GUNNER, INC. DBA  
GHOSTGUNNER.NET; CODY R. WILSON,  
CODY WILSON DBA  
GHOSTGUNNER.NET)*

Christopher Renzulli (Pro Hac Vice)  
Howard B. Schilsky (Pro Hac Vice)  
Renzulli Law Firm, LLP  
One North Broadway, Suite 1005  
White Plains, NY 10601  
Email: [crenzulli@renzullilaw.com](mailto:crenzulli@renzullilaw.com)  
[hschlisky@renzullilaw.com](mailto:hschlisky@renzullilaw.com)  
Telephone: 914-285-0700  
Facsimile : 914-285-1213  
*Co-Counsel for Defendant, JUGGERNAUT  
TACTICAL, INC.*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## PROOF OF SERVICE

I am a citizen of the United States and a resident of the County of Shasta, State of California. I am over the age of 18 years and not a party to the within action; my business mailing address is Post Office Box 994390, Redding, California 96099-4390. I am familiar with this firm's practice whereby the mail, after being placed in a designated area, is given the appropriate postage and is deposited in a U.S. mailbox after the close of the day's business.

XX On the date indicated below, I served the document(s) designated below on all parties in said action by placing a true copy thereof in a sealed envelope in the designated area for outgoing mail addressed as set forth below:

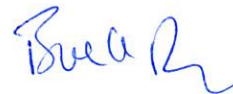
\_\_\_\_\_ On the date indicated below, I served the document(s) designated below on all parties in said action by placing a true copy thereof in a sealed envelope and mailed it via overnight mail with Federal Express addressed as set forth below:

\_\_\_\_\_ On the date indicated below, I personally served the document(s) designated below by transmitting a true copy thereof via electronic mail in .pdf format as an e-mail attachment to each addressee set forth below:

XX By Electronic Transmission: Pursuant to CCP §1010.6(e)(1), effective September 18, 2020, or an agreement of the parties to accept service by electronic transmission, I caused the document(s) to be electronically sent to the persons at the email address(es) indicated below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

## PLAINTIFFS' FURTHER CASE MANAGEMENT CONFERENCE STATEMENT

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed January 26, 2021, at Redding, California.



\_\_\_\_\_  
BREE A. BOUGHN

SEE ATTACHED SERVICE LIST