

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
15 **IN THE COUNTY OF SAN BERNARDINO**

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

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

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

28 **MICHAEL ELLIOTT**, Heir at Law and
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. : June 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, TIFFANYPHOMMATHEP;
23
24 N.P, a Minor, by and through his Guardian
25 ad Litem, TIFFANYPHOMMATHEP;
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
GHOSTGUNS.COM;
2
3 GHOST FIREARMS LLC, d/b/a GRID
DEFENSE and GHOSTRIFLES.COM;
4
5 JUGGERNAUT TACTICAL INC., d/b/a
JTACTICAL.COM;
6
7 MFY TECHNICAL SOLUTIONS LLC, d/b/a
5DTACTICAL.COM;
8
9 TACTICAL GEAR HEADS LLC, d/b/a 80-
LOWER.COM; AR-
10 15LOWERRECEIVERS.COM; and
80LOWERJIG.COM;
11
12 JAMES TROMBLEE, JR., d/b/a
USPATRIOTARMORY.COM;
13
14 INDUSTRY ARMAMENT INC., d/b/a
AMERICANWEAPONSCOMPONENTS.CO
M;
15
16 THUNDER GUNS LLC, d/b/a
THUNDERTACTICAL.COM;
17
18 DOES 1-100, Inclusive,
Defendants.

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

20 The petition for coordination was heard by the coordination motion judge, the Hon.
21 William D. Claster of the Orange County Superior Court, on May 7, 2021. Following the hearing,
22 the court ordered “the Included Actions will be coordinated, and that the location of coordinated
23 proceedings will be the Orange County Superior Court.”¹
24

25 The coordination motion judge directed the petitioners (who are the defendants in this
26 matter) file the order in each action and serve it on all parties and transmit it to the Judicial Council
27

28
¹ A copy of the “Order Granting Petition for Coordination” is attached as Exhibit A.

1 – which they did.²

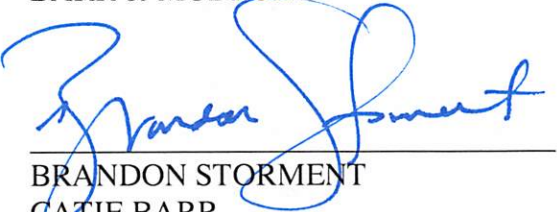
2 However, at this time, the parties have not heard from the Chair of the Judicial Council
3 concerning the assignment of a coordination trial judge.

4 Currently, our case is stayed (in light of this Court's order issued at the Decemer 4, 2020
5 CMC hearing) pending the outcome of the coordination proceedings.

6 Here, plaintiffs respectfully request the Court continue the stay pending the assignement
7 of a coordination trial judge.
8

9
10 DATED: May 29, 2021

BARR & MUDFORD

11
12 

13 BRANDON STORMENT
14 CATIE BARR
15 ESTEE LEWIS
16 Attorneys for Plaintiffs

17
18
19
20
21
22
23
24
25
26
27
28

² The Clerk's Certificate of Mailing and Proof of Service are attached as Exhibit B.

EXHIBIT A

MAY 07 2021

DAVID H. YAMASAKI, Clerk of the Court

BY: CTH DEPUTY

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE, CIVIL COMPLEX CENTER
Hon. William D. Claster, Coordination Motion Judge**

**Coordination Proceeding Special
Title (Rule 3.550)**

GHOST GUNNER FIREARMS CASES

Included actions:

**Cardenas v. Ghost Gunner, Inc. dba
GhostGunner.net, et al.**

**McFayden, et al. v. Ghost Gunner,
Inc., dba GhostGunner.net, et al.**

**JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 5167**

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
NO. 30-2019-01111797**

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
NO. CIVDS193452**

**ORDER GRANTING PETITION FOR
COORDINATION**

**Ghost Firearms, LLC; Thunder Gus, LLC; Ryan Beezley; Bob Bezzley; and MFY
Technical Solutions, LLC ("Petitioners") seek the coordination of the following
cases (the "Included Actions"):**

- 1. *McFayden, et al. v. Ghost Gunner Inc., et al.*, San Bernardino SC No.**

1 CIVDS1935422. It appears undisputed that *McFayden* is pending before a
2 complex department in San Bernardino.

3
4 2. *Cardenas v. Ghost Gunner Inc., et al.*, OCSC No. 19-01111797. *Cardenas* is
5 pending before Judge Lewis in Department C26, but he has designated the
6 case complex and stayed proceedings to permit the filing of this
7 coordination petition. (Brady Decl. (ROA 5), Ex. C.) As a result of the stay,
8 while *Cardenas* has been designated complex, it has not yet been
9 transferred to a complex department by the Presiding Judge.

10
11 I. Background

12
13 A. Factual Allegations

14
15 The Included Actions, whose complaints are nearly word-for-word identical
16 except for details about the plaintiffs, arise from a shooting spree that took place
17 in Tehama County on November 13 and 14, 2017. During this spree, Kevin Neal
18 shot numerous victims, some of whom died, and others of whom were injured.
19 The plaintiffs in the Included Actions are among Neal's surviving victims and the
20 survivors of those he killed.

21
22 The Included Actions are less about the shootings themselves than the
23 weapons used by Neal. Plaintiffs allege that defendants manufacture and
24 distribute kits and firearms parts that can easily be assembled by a buyer into a
25 fully functioning firearm. Because defendants do not actually manufacture or
26 distribute *firearms*, only *firearms parts or kits*, purchasers do not need to pass
27 background checks or interact with a federal firearms licensee ("FFL," i.e., a
28 federally authorized gun dealer). Moreover, because defendants only distribute

1 parts or kits, the weapons that buyers eventually assemble do not have traceable
2 serial numbers unless specifically required by state law. The guns so assembled
3 are therefore called "ghost guns."
4

5 Defendants' parts and kits allegedly include materials that could be used to
6 assemble a fully functional AR-15 style "ghost gun." Plaintiffs allege that Neal
7 used at least two AR-15 style "ghost guns" in his shooting spree, but because they
8 lacked serial numbers, it is impossible to tell who manufactured the parts.
9 Accordingly, plaintiffs bring suit against a number of "ghost gun" manufacturers
10 and distributors. Plaintiffs further allege that AR-15 style rifles are illegal to
11 possess in California, that defendants take no steps to prevent the sale of their AR-
12 15 firearms parts/kits to California residents, and that Neal could not possibly have
13 acquired an AR-15 style rifle legally from a California FFL. Based on these
14 allegations, plaintiffs bring claims for negligence, nuisance and UCL violations.
15

16 B. Procedural History

17

18 *Cardenas* and *McFayden* were both filed on the same day. (See Brady Decl.
19 (ROA 5), Exs. A-B [both file stamped 11/14/19].) *McFayden* was presumably the
20 first-filed case, because the complaint in *Cardenas* specifically notes *McFayden* as
21 a related case. (*Id.*, Ex. A, ¶ 18.) No responsive pleadings have been filed in either
22 case. (*Id.*, ¶ 16.) Some defendants have not yet been served with process. (*Id.*, ¶
23 9(a).)
24

25 *McFayden* was assigned to a complex department in San Bernardino
26 County. (*Id.*, ¶ 14.) *Cardenas* did not designate his case complex in his cover
27 sheet, so his case was originally assigned to general civil. (*Id.*, ¶ 15.) In October
28 2020, Petitioners filed a motion in *Cardenas* to either (1) designate the case

1 complex and permit the filing of a coordination petition or (2) keep the case in
2 general civil and order *McFayden* transferred to Orange County to be consolidated
3 with *Cardenas*. (Rosenfeld Decl. (included in ROA 8), Ex. 1. Because only non-
4 complex matters can be consolidated, this relief would have the effect of finding
5 *McFayden* was not complex.) The plaintiffs in both *Cardenas* and *McFayden* filed
6 non-oppositions asking the courts to transfer *McFayden* to Orange County to be
7 consolidated with *Cardenas*. (*Id.*, Ex. 2.)
8

9 Judge Lewis chose the first alternative. He designated *Cardenas* complex
10 and allowed the filing of a coordination petition, then stayed proceedings pending
11 the outcome of the planned petition. (Brady Decl., Ex. C.) Again, because
12 *Cardenas* is stayed, it has been designated complex but not yet transferred to a
13 complex department.
14

15 Petitioners then filed the present petition for coordination, seeking
16 coordination in San Bernardino County rather than Orange County.
17

18 **II. Propriety of Coordination**

19

20 All parties agree coordination is proper. Upon its own review of the papers,
21 the Court agrees that coordination is proper under the factors listed in CCP §
22 404.1.
23

24 **III. Location of Coordinated Proceedings**

25

26 The parties disagree on where coordinated proceedings should take place.
27 Petitioners, and the defendants they have been able to contact, favor San
28 Bernardino County. Plaintiffs favor Orange County. In addition, the *McFayden*

1 plaintiffs propose Sacramento County as an alternate site for coordinated
2 proceedings, as Sacramento County is comparatively convenient to Tehama
3 County and has a dedicated complex litigation program judge.

4
5 In determining the location for coordinated proceedings, the following
6 factors are to be considered (CRC 3.530(b)):

- 7
- 8 1. The number of included actions in particular locations;
 - 9 2. Whether the litigation is at an advanced stage in a particular court;
 - 10 3. The efficient use of court facilities and judicial resources;
 - 11 4. The locations of witnesses and evidence;
 - 12 5. The convenience of the parties and witnesses;
 - 13 6. The parties' principal places of business;
 - 14 7. The office locations of counsel for the parties; and
 - 15 8. The ease of travel to and availability of accommodations in particular
16 locations.

17
18 **A. Number of Included Actions**

19
20 As between Orange and San Bernardino Counties, this factor is a wash.
21 Because no action is pending in Sacramento County, it cuts against that venue.

22
23 **B. Advanced Stage of Litigation; Efficient Use of Court Resources**

24
25 Petitioners mention this factor in reply. They note that the court in
26 *McFayden* has already held two case management conferences, so the judge is
27 more familiar with the case than the yet-to-be-assigned complex judge in
28 *Cardenas* will be. According to Petitioners, if the coordinated proceedings go

1 forward in Orange County, everything would have to "start from scratch." (Reply
2 (ROA 9), p. 4.)

3
4 The Court is not persuaded by this argument. While it indeed appears no
5 case management conference has been held in *Cardenas*, responsive pleadings
6 have yet to be filed in either case. No court has a deep familiarity with the facts
7 and law that would come from lengthy supervision of a case.

8
9 Furthermore, this argument appears to contradict the relief sought from
10 Judge Lewis. If things had progressed so far in *McFayden* that the parties would
11 be prejudiced by having to start from scratch in Orange County, why would
12 Petitioners make an alternate request for consolidation in Orange County? Why
13 not have *Cardenas* transferred to San Bernardino County?

14
15 The Court finds this factor of little relevance. The two cases are in such
16 early stages that even sending them to Sacramento County would cause little (if
17 any) delay or waste of court resources.

18
19 **C. Location and Convenience of Parties, Witnesses, and Evidence**

20
21 As to the defendants, these factors favor either Orange County or San
22 Bernardino County. The in-state defendants have their principal places of business
23 in those counties, meaning witnesses and documents pertinent to business
24 operations are most likely located in those counties. (The out-of-state defendants
25 will be inconvenienced no matter what.)

26
27 As to the plaintiffs, these factors favor Sacramento County. In terms of the
28 in-state plaintiffs (again, the out-of-state plaintiffs will be inconvenienced no

1 matter what), only Cardenas and potentially witnesses related to him are in
2 Southern California. Otherwise, fact witnesses and evidence relating to the
3 shooting itself (including treating physicians) are most likely to be located in and
4 around Tehama County. Tehama County, however, does not appear to have a
5 complex division. The *McFayden* plaintiffs present Sacramento County as the
6 next-best location.

7
8 On this record, the Court would ordinarily conclude these factors do not tip
9 one way or the other. Sacramento County is nearer witnesses and evidence
10 relating to the shooting itself, while Orange and San Bernardino Counties are
11 nearer to witnesses and evidence relating to the in-state defendants' operations.
12 But all Plaintiffs agree Orange County would be convenient, and Petitioners
13 represented to Judge Lewis that Orange County would be an appropriate location
14 for future consolidated proceedings. Based on these representations, the Court
15 finds the parties agree Orange County would be the most convenient for the
16 parties, the witnesses and the evidence. The Court is not persuaded by
17 Petitioners' attempt to draw a distinction between "consolidation is proper in
18 Orange County" and "coordination is proper in San Bernardino County."

19
20 **D. Location of Counsel**

21
22 It appears that Plaintiffs' counsel, with the exception of attorney Singleton,
23 are based in Northern California, making Sacramento County more convenient for
24 them. Most Defendants' counsel appear to be based in Southern California. (The
25 exceptions are one firm based in Walnut Creek and one in White Plains, New
26 York.) Orange or San Bernardino Counties would be more convenient for them.
27 The Court finds this factor does not lean toward any particular venue.
28

1 **E. Ease of Travel and Availability of Accommodations**

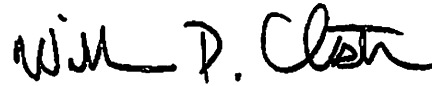
2
3 All three counties have major airports: Santa Ana, Ontario and Sacramento.
4 Plaintiffs point out, however, that San Bernardino County has less hotel
5 accommodations available near the courthouse. The Court finds this factor cuts
6 slightly against San Bernardino County.

7
8 **IV. Conclusion**

9
10 Taking the above into account, the Court orders that the Included Actions
11 will be coordinated, and that the location of coordinated proceedings will be the
12 Orange County Superior Court. The Court of Appeal, Fourth District, Division
13 Three will serve as the reviewing court.

14
15
16
17 Dated: _____

5-7-21



18 Judge William D. Claster

19 Coordination Motion Judge
20
21
22
23
24
25
26
27
28

EXHIBIT B

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

Civil Complex Center
751 W. Santa Ana Blvd
Santa Ana, CA 92701

SHORT TITLE: Ghost Gunner Firearms Cases**CLERK'S CERTIFICATE OF MAILING/ELECTRONIC
SERVICE****CASE NUMBER:**
JCCP 5167

I certify that I am not a party to this cause. I certify that a true copy of the above Order - Other dated 05/07/21 has been placed for collection and mailing so as to cause it to be mailed in a sealed envelope with postage fully prepaid pursuant to standard court practice and addressed as indicated below. This certification occurred at Santa Ana, California on 5/7/21. Following standard court practice the mailing will occur at Sacramento, California on 5/10/21.

CHAIR, JUDICIAL COUNCIL OF CALIFORNIA
ATTN: APPELLATE COURT SERVICES (CIVIL
CASE COORDINATION)
455 GOLDEN GATE AVE, 5TH FLOOR
SAN FRANCISCO, CA. 94102-2688

Clerk of the Court, by: , Deputy

I certify that I am not a party to this cause. I certify that the following document(s), Order - Other dated 05/07/21, have been transmitted electronically by Orange County Superior Court at Santa Ana, CA. The transmission originated from Orange County Superior Court email address on May 7, 2021, at 1:52:18 PM PDT. The electronically transmitted document(s) is in accordance with rule 2.251 of the California Rules of Court, addressed as shown above. The list of electronically served recipients are listed below:

BARR & MUDFORD LLP
BRANDON@BARRANDMUDFORD.COM

BEN ROSENFELD
BEN.ROSENFELD@COMCAST.NET

GORDON REES
SROUNDSBURG@GRSM.COM

LIVINGSTON LAW FIRM
CVANDERPUTTEN@LIVINGSTONLAWYERS.COM

MICHEL & ASSOCIATES, P.C.
JDALE@MICHELLAWYERS.COM

ORRICK HERRINGTON
ANNASABER@ORRICK.COM

PETIT KOHN
JFELTON@PETITTKOHN.COM

RENZULLI LAW FIRM
HSCHILSKY@RENZULLILAW.COM

SINGLETON LAW FIRM
GERALD@SLFFIRM.COM

Clerk of the Court, by: , Deputy

CLERK'S CERTIFICATE OF MAILING/ELECTRONIC SERVICE**12**

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF ORANGE

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 May 10, 2021, I served the foregoing document(s) described as:

8 **NOTICE OF RULING ON PETITION FOR COORDINATION OF ACTIONS**

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 ELECTRONIC MAIL)** As follows: I served a true and correct copy by electronic
15 transmission through One Legal. Said transmission was reported and completed without
16 error.

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

19 Executed on May 10, 2021, at Long Beach, California.

20 
21 _____
22 Laura Palmerin

SERVICE LIST

Dugan Barr

Attorneys for Plaintiffs

Douglas Mudford

doug@ca-lawyer.com

Estee Lewis

estee@ca-lawyer.com

Catie Barr

catie@ca-lawyer.com

Brandon Storment

brandon@barrandmudford.com

Barr & Mudford, LLP

Post Office Box 994390

Redding, CA 96099-4390

Fax: (530) 243-1648

Amy K. Van Zant

Attorneys for Plaintiffs

avanzant@orrick.com

Shayan Said

ssaid@orrick.com

Anna Z. Saber

annasaber@orrick.com

Orrick, Herrington & Sutcliffe LLP

1000 Marsh Road

Menlo Park, CA 94025-1015

Fax: (650) 614-7401

Gerald B. Singleton

Attorneys for Plaintiffs

gerald@SLFfirm.com

SINGLETON LAW FIRM

450 A Street, 5th Floor

San Diego, CA 92101

Fax: (619) 255-1515

Ben Rosenfeld

Attorneys for Plaintiffs

ben.rosenfeld@comast.net

ATTORNEY AT LAW

115 ½ Bartlett Street

San Francisco, CA 94110

Fax: (415) 285-8092

Craig A. Livingston

*Attorneys for Defendant Tactical Gear Heads,
LLC*

clivingston@livingstonlawyers.com

Crystal L. Van Der Putten

cvanderputten@livingstonlawyers.com

LIVINGSTON LAW FIRM

A Professional Corporation

1600 South Main Street, Suite 280

Walnut Creek, CA 94596

Fax: (925) 952-9881

1 Grant D. Waterkotte
2 gwaterkotte@pettitkohn.com

3 Justin R. Felton

4 jfelton@pettitkohn.com

5 Petit Kohn Ingrassia Lutz & Dolin PC

6 5901 W. Century Blvd., Suite 1100

7 Los Angeles, CA 90045

8 Fax: (310) 649-5777

9 Craig J. Mariam

10 cmariam@grsm.com

11 John P. Cogger

12 jcogger@grsm.com

13 Sebastian M. Van Roundsburg

14 sroundsburg@grsm.com

15 Gordon Rees Scully Mansukhani, LLP

16 635 West Fifth Street, 52nd Floor

17 Los Angeles, CA 90071

18 Fax: (877) 306-0043

19 Christopher Renzulli

20 crenzulli@renzullilaw.com

21 Howard B. Schilsky

22 hschilsky@renzullilaw.com

23 Renzulli Law Firm, LLP

24 One North Broadway, Suite 1005

25 White Plains, NY 10601

26 Fax: (914) 285-1213

*Attorneys for Defendants Defense Distributed
and Cory R. Wilson*

*Attorneys for Defendant Juggernaut Tactical,
Inc.*

*Attorneys 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:

_____ 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 May 28, 2021, at Redding, California.



BREE A. BOUGHN

SEE ATTACHED SERVICE LIST

1 Craig J. Mariam
2 John P. Cogger
3 Sebastian M. Van Roundsburg
4 Gordon Rees Scully Mansukhani, LLP
5 633 West Fifth Street, 52nd Floor
6 Los Angeles, CA 90071
7 Email: cmariam@grsm.com
8 Jcogger@grsm.com and
9 sroundsburg@grsm.com
10 Telephone: 213-576-5000
11 Facsimile : 877-306-0043
12 *Attorneys for Defendant, JUGGERNAUT*
13 *TACTICAL, INC.*
14
15 Craig A. Livingston and
16 Crystal L. Van Der Putten
17 Livingston Law Firm
18 1600 South Main Street, Suite 280
19 Walnut Creek, CA 94596
20 Telephone: 925-952-9880
21 Facsimile : 925-952-9881
22 clivingston@livingstonlawyers.com
23 cvanderputten@livingstonlawyers.com
24 *Attorneys for Defendant,*
25 *TACTICAL GEAR HEADS, LLC*
26
27 Sean A. Brady
28 C. D. Michel
Michel & Associates, P.C.
180 East Ocean Boulevard, Suite 200
Long Beach, CA 90802
Email: sbrady@michellawyers.com
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
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
hschlisky@renzullilaw.com
Telephone: 914-285-0700
Facsimile : 914-285-1213
Co-Counsel for Defendant, JUGGERNAUT
TACTICAL, INC.