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Attorneys for Petitioners  
Ghost Firearms, LLC, Thunder Guns, LLC,  
Ryan Beezley and Bob Beezley, and  
MFY Technical Solutions, LLC

JUDICIAL COUNCIL OF CALIFORNIA  
CHAIR OF THE JUDICIAL COUNCIL

FRANCISCO GUDINO CARDENAS, an  
individual,

Plaintiff,

v.

GHOST GUNNER INC., d/b/a  
GHOSTGUNNER.NET; et al.,

Defendants.

TROY MCFADYEN, in his Individual  
Capacity, and as Heir at Law and Successor  
in Interest to MICHELLE MCFADYEN,  
Deceased; et al.,

Plaintiffs,

v.

GHOST GUNNER INC., d/b/a  
GHOSTGUNNER.NET; et al.,

Defendants.

Judicial Council Coordination Proceeding

JCCP NO. \_\_\_\_\_

Orange County Superior Court Case No. 30-  
2019-01111797-CU-PO-CJC

San Bernardino Superior Court Case No. CIV  
DS 1935422

**DECLARATION OF SEAN A. BRADY RE:  
PROOF OF FILING NOTICE OF  
SUBMISSION OF PETITION FOR  
COORDINATION OF ACTIONS**

1 I, Sean A. Brady, declare as follows:


2 1. I am an attorney at law admitted to practice in the State of California. I am  
3 counsel for those bringing the Petition for Coordination of Actions submitted to the Judicial  
4 Council on February 5, 2021, Ghost Firearms, LLC, Thunder Guns, LLC, Ryan Beezley and Bob  
5 Beezley, and MFY Technical Solutions, LLC ("Petitioners"). My statements herein are based  
6 upon my personal knowledge, except those statements that are based upon information and belief.  
7 If I were to be called as a witness, I could and would competently testify under oath as to the  
8 matters that I have set forth in this declaration.

9 2. On February 9, 2021, a Notice of Submission of Petition for Coordination of  
10 Actions with a copy of the Petition for Coordination of Actions and supporting documents was  
11 submitted for electronic filing in *Francisco Gudino Cardenas v. Ghost Gunner, Inc. et al.*, Case  
12 No. 30-2019-01111797-CU-PO-CJC. A true and correct copy of the Notice of Confirmation of  
13 Electronic Filing is attached here as **Exhibit 1**.

14 3. On February 9, 2021, a Notice of Submission of Petition for Coordination of  
15 Actions with a copy of the Petition for Coordination of Actions and supporting documents was  
16 submitted for fax filing in *Troy McFadyen, et al v. Ghost Gunner, Inc., et al*, Case No. CIV DS  
17 1935422. A true and correct copy of the fax filing receipt is attached here as **Exhibit 2**.

18 I declare under the penalty of perjury under the laws of the State of California that the  
19 foregoing is true and correct.

20 Executed this 9th day of February 2021, at Long Beach, California.

21  
22  
23   
24 Sean A. Brady, Declarant

# EXHIBIT 1

<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE</b> STREET ADDRESS: 700 W. Civic Center Drive MAILING ADDRESS: 700 W. Civic Center Drive CITY AND ZIP CODE: Santa Ana CA 92701 BRANCH NAME: Central Justice Center	FOR COURT USE ONLY
SHORT TITLE: Cardenas vs. Ghost Gunner Inc.	
<b>NOTICE OF CONFIRMATION OF ELECTRONIC FILING</b>	CASE NUMBER: 30-2019-01111797-CU-PO-CJC

The Electronic Filing described by the below summary data was reviewed and accepted by the Superior Court of California, County of Orange. In order to process the filing, the fee shown was assessed.

**Electronic Filing Summary Data**

Electronically Submitted By: BOB BEEZLEY  
 On Behalf of: RYAN BEEZLEY; CCMS ID: 78572189, MFY TECHNICAL SOLUTIONS LLC; CCMS ID: 78572275, BOB BEEZLEY; CCMS ID: 78572190, GHOST FIREARMS LLC; CCMS ID: 78572192, THUNDER GUNS LLC; CCMS ID: 78572279

Transaction Number: 1811064  
 Court Received Date: 02/09/2021  
 Court Received Time: 11:28:57 AM  
 Filed Date: 02/09/2021  
 Filed Time: 11:28 AM  
 Fee Amount Assessed: \$0.00  
 Case Number: 30-2019-01111797-CU-PO-CJC  
 Case Title: Cardenas vs. Ghost Gunner Inc.  
 Location: Central Justice Center

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Case Type: PI/PD/WD - Other  
 Case Category: Civil - Unlimited  
 Jurisdictional Amount: > 25000

Case Title:

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**Documents Electronically Filed/Received**

Notice - Other

**Status**

Accepted

**Comments**

**Submitter's Comments:**

**Clerk's Comments:**

**Electronic Filing Service Provider Information**

Service Provider OneLegal

Email: support@onelegal.com

Contact Person: Customer Support

Phone: 8009388815

# EXHIBIT 2

## Laura Palmerin

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**To:** Irma L. Galeano  
**Subject:** RE: Message Sent: 666852168 | 2/9/2021 12:20:55 PM MST

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**From:** Nextiva vFax <[notifications@nextivafax.com](mailto:notifications@nextivafax.com)>  
**Sent:** Tuesday, February 09, 2021 12:43 PM  
**To:** efax <[efax@michellawyers.com](mailto:efax@michellawyers.com)>  
**Subject:** Message Sent: 666852168 | 2/9/2021 12:20:55 PM MST

### Delivery Information:

Message #: 666852168  
Status: Success  
Sender Name: Michel & Associates PC  
Sender Company: Michel and Associates  
Sender Phone: 5622164444  
Remote CSID: 1.909.453.4842  
Total Pages: 129  
Start Time: 2/9/2021 12:20:55 PM MST  
End Time: 2/9/2021 3:03:04 PM MST  
Duration: 4.822 sec  
Delivery Count: 1

### Recipient List:

San Bernardino Civil Filing - 19097088586

[Click here to view this message online](#)

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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): Ghost Firearms, LLC, Thunder Guns, LLC, Ryan Beezley, Bob Beezley, MFY Technical Solutions, LLC, Blackhawk Manufacturing Group, Inc.	FOR COURT USE ONLY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO</b> STREET ADDRESS: 247 West Third Street MAILING ADDRESS: 247 West Third Street CITY AND ZIP CODE: San Bernardino 92415-0210 BRANCH NAME: Civil Division of the San Bernardino District	
PLAINTIFF/PETITIONER: Troy McFadyen, et al. DEFENDANT/RESPONDENT: Ghost Gunner, Inc., et al.	
<b>FACSIMILE TRANSMISSION COVER SHEET</b>	CASE NUMBER: CIVDS1935422

## TO THE COURT:

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

Document name  
 Notice of Submission of Petition for Coordination

No. of pages  
 128

\*Please send back conformed copy. Fee may be charged to credit card listed below.

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.: [REDACTED] Expiration date: [REDACTED]

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.: