1.1			
1	DOUGLAS MUDFORDState Bar No. 156392		
2	ESTEE LEWISState Bar No. 268358 CATIE BARRState Bar No. 295538		
3	BRANDON STORMENTState Bar No. 267260 BARR & MUDFORD		
4	1824 Court Street/Post Office Box 994390		
5	Redding, California 96099-4390 Telephone: (530) 243-8008		
6	Facsimile: (530) 243-1648		
7	Attorneys for Plaintiffs		
8			
9	IN THE SUPERIOR COURT OF CALIFORNIA		
10	IN THE COUNTY OF ORANGE, CIVIL COMPLEX CENTER		
11	Hon. William D. Claster, Coordination Motion Judge		
12			
13	Coordination Proceeding Special Title	JUDICIAL COUNCIL COORDINATION	
14	(Rule 3.550)	PROCEEDINGS NO. 5167	
15	GHOST GUNNER FIREARMS CASES	DECLARATION OF PLAINTIFFS'	
16	Included actions:	COUNSEL BRANDON STORMENT RE RESPONSE TO DEFENDANTS'	
17		PETITION FOR COORDINATION	
18			
19	Cardenas v. Ghost Gunner, Inc. dba Ghost		
20	Gunner.net, et al.	SUPERIOR COURT OF CALIFORNIA COUNTY OF ORANGE	
21	McEardan et al v. Chast Cunnon Inc. dha	NO. 30-2019-01111797	
22	McFayden, et al. v. Ghost Gunner, Inc., dba GhostGunner.net, et al.	SUPERIOR COURT OF CALIFORNIA	
23		COUNTY OF SAN BERNARDINO NO. CIV-DS1935422	
24			
25	I DD ANDON GTODAGNE de de de la constante de de la constante d		
26	I, BRANDON STORMENT, declare:		
27	I am an attorney at law duly authorized to practice before all courts of the State of		
28	California and a partner of the law firm of Barr & Mudford, attorneys of record herein for		
1			

BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 (530) 243-8008

plaintiffs, McFayden, et al. v. Ghost Gunner, Inc., dba GhostGunner.net, et al., San Bernardino 1 2 County Superior Court Case No. CIV-DS1935422. 3 The matters which are embraced within my Declaration are matters within my personal 4 knowledge and if called upon I would and could competently testify as follows: 5 1. I declare under penalty of perjury that the foregoing is true and correct, except as 6 to any information stated on information and belief, and as to such information, I believe 7 8 Sworn and subscribed to this 26th day of April, 2021, at Redding, California. 9 10 Respectfully Submitted DATED: April 26, 2021 11 12 BRANDON STORMENT 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 (530) 243-8008

BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 (530) 243-8008

1	SERVICE	ELIST
2	Craig J. Mariam	Justin R. Felton
	John P. Cogger	Marie Frandsen
3	Sebastian M. Van Roundsburg	PETTIT KOHN INGRASSIA
4	GORDON REES SCULLY	LUTZ & DOLIN, PC
_	MANSUKHANI, LLP	5901 West Century Blvd., Suite 1100
5	633 West Fifth Street, 52 nd Floor	Los Angeles, CA 90045 Email: <u>ifelton@pettikohn.com</u>
6	Los Angeles, CA 90071	mfrandsen@pettikohn.com
7	Email: cmariam@grsm.com Jcogger@grsm.com and	Telephone: 310-649-5772
	sroundsburg@grsm.com	Facsimile: 310-649-5777
8	Telephone: 213-576-5000	Attorneys for Defendants, DEFENSE
9	Facsimile: 877-306-0043	DISTRIBUTED (ERRONEOUSLY SUED
	Attorneys for Defendant, JUGGERNAUT	AS GHOST GUNNER, INC. DBA GHOSTGUNNER.NET; CODY R.
10	TACTICAL, INC.	WILSON, CODY WILSON DBA
11	Craig A. Livingston and	GHOSTGUNNER.NET)
	Crystal L. Van Der Putten	
12	LIVINGSTON LAW FIRM	Christopher Renzulli (Pro Hac Vice)
13	1600 South Main Street, Suite 280	Howard B. Schilsky (Pro Hac Vice)
	Walnut Creek, CA 94596 Telephone: 925-952-9880	RENZULLI LAW FIRM, LLP
14	Facsimile: 925-952-9881	One North Broadway, Suite 1005 White Plains, NY 10601
15	clivingston@livingstonlawyers.com	Email: <u>crenzulli@renzullilaw.com</u>
16	cvanderputten@livingstonlawyers.com	hschlisky@renzullilaw.com
10	Attorneys for Defendant, TACTICAL GEAR HEADS, LLC	Telephone: 914-285-0700
17	TACTICAL GEAR HEADS, LLC	Facsimile: 914-285-1213
18	Amy K. Van Zant	Co-Counsel for Defendant,
	Anna Saber	JUGGERNAUT TACTICAL, INC.
19	ORRICK HERRINGTON & Sutcliffe LLP	Gerald Singleton
20	400 Capitol Mall, Suite 3000 Sacramento, CA 95814-4497	SINGLETON SCHREIBER
21	Email: avanzant@orrick.com	MCKENZI & SCOTT
21	annasaber@orrick.com	450 A Street, 5th Floor
22	Telephone: 916-447-9200	San Diego, CA 92101 Email: gerald@slffirm.com
23	Facsimile: 650-614-7401	Telephone: 619-771-3473
į	Ben Rosenfeld	Facsimile: 619-255-1515
24	LAW OFFICE OF BEN ROSENFELD	
25	115 ½ Bartlett Street	
26	San Francisco, CA 94100-3022	
26	Email: ben.rosenfeld@comcast.net	
27	Telephone: 415-285-8091 Facsimile: 415-285-8092	
28	Via First Class Mail only:	Sean A. Brady
	TOWN TO COMMON TRANSCOTTORY.	

Chair, Judicial Council of California Attn: Appellate Court Services (Civil Case Coordination) 455 Golden Gate Avenue, 5th Floor San Francisco, CA 94102-2688 Francisco, CA 94102-2688 San Francisco, CA 94102-2688 S			
Coordination	1		
San Francisco, CA 94102-2688 Email: sbrady@minchellawyers.com lpalmerin@michellawyers.com Telephone: 562-216-4444 Facsimile: 562-216-4444 Facsimile: 562-216-4444 Facsimile: 562-216-4445 Facsimile: 562-216-445 Facsimile: 562-216-4445 Facsimile: 562-216-445 Facsimil	2		
Ipalmerin@michellawyers.com Telephone: 562-216-4444 Facsimile: 562-216-4444 Facsimile: 562-216-4444 Facsimile: 562-216-4445 Attorneys for Defendants, BLACKHAWK MANUFACTURING GROUP, INC., RYAN AND BOB BEEZLEY RAYAN AND BOB BEEZLEY	3	455 Golden Gate Avenue, 5th Floor	Long Beach, CA 90802
Facsimile : 562-216-4445	4	San Francisco, CA 94102-2000	lpalmerin@michellawyers.com
MANUFACTURING GROUP, INC., RYAN AND BOB BEEZLEY BOB BEEZLEY (R & B TOOL SUPPLY) DBA RBTACTICIALTOCLING.COM GHOST FIREARMS, LLC; MFY TECHNICAL SOLUTIONS, LLC AND THUNDER GUNS, LLC 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 BARR & MUDFORD MANUFACTURING GROUP, INC., RYAN AND BOB BEEZLEY BOB BEEZLEY (R & B TOOL SUPPLY) DBA RBTACTICIALTOCLING.COM GHOST FIREARMS, LLC; MFY TECHNICAL SOLUTIONS, LLC AND THUNDER GUNS, LLC 11 22 23 24 25 26 27 28 BARR & MUDFORD MANUFACTURING GROUP, INC., RYAN AND BOB BEEZLEY BOB BOB BEEZLEY BOB BEEZLEY BOB BEEZLEY BOB BEEZLEY BOB BOB BEEZLEY BOB BEEZLEY BOB BOB BOEZLEY BOB BOB BEEZLEY BOB BOB BEEZLEY BOB BOB BEEZLEY BOB BOB BOEZLEY BOB BOB BEEZLEY BOB BOB BOEZLEY BOB BO	5		Facsimile: 562-216-4445
7	6		
BARE & MUDER BARE & BARE & MUDER BARE & MUDER BARE & BA	7		RYAN AND BOB BEEZLEY
## TECHNICAL SOLUTIONS, LLC AND THUNDER GUNS, LLC ### THUNDER GUNS	8		DBA RBTACTICIALTOOLING.COM
11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 BARR & MUDFORD Anomory at Law BORGHING LAW (SOW) 49/10 PROOf of Service Proof of Service	9		TECHNICAL SOLUTIONS, LLC AND
12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 BARR & MUDFORD Alconeys at Law (Bodding Low Goods and Low (Bodding L	10		THUNDER GUNS, LLC
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 BARR & MUDFORD Atomys at Law RSQ (Cont Searce RSQ (Cont Sear	11		
14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 BARR & MUDPORD Altoneys et Law 1804 ROG Clear Servic Rod Clear Servic Rod Clear Servic Rod Clear Servic Rod Clear Service Proof of Service	12		
15 16 17 18 19 20 21 22 23 23 24 25 26 27 28 BARR & MUDPORD Alteropy at Law Post Office Box 9959-490 Proof of Service	13		
16 17 18 19 20 21 22 23 24 25 26 27 28 BARR & MUDFORD Attorney at Law Post Office Box 99409 Post Office Box 99409 Post Office Box 99409 Proof of Service	14		
17 18 19 20 21 22 23 24 25 26 27 28 BARR & MUDPORD Attorneys at Law Page 3 Proof of Service	15		
18 19 20 21 22 23 24 25 26 27 28 BARR & MUDFORD Attorneys of Law 1824 Central Street Post Office Box 994390 Proof of Service	16		
19 20 21 22 23 24 25 26 27 28 BARR & MUDFORD Attorneys at Law 183 Court Siret Post Office Box 994390 Redding. CA 80990-4390 Proof of Service	17		
20 21 22 23 24 25 26 27 28 BARR & MUDFORD Attorneys at Law 1834 Court Street Post Office Box 994390 Redding, CA 99599-4390 Proof of Service	18		
21 22 23 24 25 26 27 28 BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96999-4390 Proof of Service	19		
22 23 24 25 26 27 28 BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 9994390 Redding, CA 9994390 Proof of Service	20		
23 24 25 26 27 28 BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 Proof of Service	21		
24 25 26 27 28 BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 94390 Redding, CA 96099-4390 Proof of Service	22		
25 26 27 28 BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 Redding, CA 96099-4390			
26 27 28 BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 Proof of Service			
27 28 BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 Redding, CA 96099-4390			
BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 Redding, CA 96099-4390			
BARR & MUDFORD Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 Redding, CA 96099-4390			
Attorneys at Law 1824 Court Street Post Office Box 994390 Redding, CA 96099-4390 Redding, CA 96099-4390			
Redding, CA 96099-4390	Attorneys at Law 1824 Court Street		
	Redding, CA 96099-4390	Proof of	SEL VICE