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14 Attorneys for Defendant  
15 JUGGERNAUT TACTICAL INC.

16 SUPERIOR COURT OF CALIFORNIA  
17 COUNTY OF ORANGE, CIVIL COMPLEX CENTER  
18 Hon. William D. Cluster, Coordination Trial Judge

19 Coordination Proceeding Special )  
20 Title (Rule 3.550) ) JUDICIAL COUNCIL COORDINATION  
21 ) PROCEEDING NO. 5167  
22 GHOST GUNNER FIREARMS CASES )  
23 ) SUPERIOR COURT OF CALIFORNIA  
24 ) COUNTY OF ORANGE  
25 Included actions: ) CASE NO. 30-2019-01111797

26 )  
27 Cardenas v. Ghost Gunner, Inc. dba ) SUPERIOR COURT OF CALIFORNIA  
28 GhoseGunner.net, et al. ) COUNTY OF SAN BERNARDINO  
CASE NO. CIVDS193452

MEMORANDUM IN SUPPORT OF  
APPLICATION FOR ADMISSION *PRO*  
*HAC VICE* OF CHRISTOPHER  
RENZULLI

Res ID: 73588004

Date: September 24, 2021

Time: 9:00 a.m.

Dept.: CX104

1 **I. INTRODUCTION**

2 Defendant Juggernaut Tactical, Inc. ("Juggernaut Tactical ") requests that this Court  
3 grant its Application for Admission *Pro Hac Vice* of Christopher Renzulli (the "Application"  
4 and "Applicant," respectively) pursuant to rule 9.40 of the California Rules of Court. The  
5 Applicant has been retained by Juggernaut Tactical to represent it in this matter, is familiar with  
6 the information and issues in this lawsuit, and his presence as counsel in this case will promote  
7 efficiency in the prosecution and defense of this action.

8 **II. INFORMATION REQUIRED BY RULE 9.40 OF THE CALIFORNIA**  
9 **RULES OF COURT**

10 The information required by Rule 9.40 of the California Rules of Court for admission as  
11 counsel *pro hac vice* is set forth below and is verified below and in the accompanying  
12 Declaration of Christopher Renzulli, and the Declaration of Michael E. Gallagher, Jr. in support  
13 of this Application to permit Mr. Renzulli to appear *pro hac vice* in this matter on behalf of  
14 defendant Juggernaut Tactical, Inc.

15 Mr. Renzulli's business address is: Renzulli Law Firm, LLP, One North Broadway, Suite  
16 1005, White Plains, NY, 10601

17 Mr. Renzulli's residence address is: 31 Overlook Drive, Chappaqua, NY 10514.

18 Mr. Renzulli has been admitted to practice in, and remains a member in good standing  
19 of, the following courts (with date of admission in parentheses):

20 State Bar of New York (2<sup>nd</sup> Dept. 1995); State of Connecticut (1995); U.S. District  
21 Court for the Eastern District of New York (1995); U.S. District Court for the Southern District  
22 of New York (1995); U.S. District Court for the Northern District of New York (1997); U.S.  
23 District Court for the District of Connecticut (2003); U.S. District Court for the Eastern District  
24 of Michigan (2000); U.S. District Court for the Western District of Michigan (2015); U.S. Court  
25 of Appeals for the 1<sup>st</sup> Circuit (1998); U.S. Court of Appeals for the 2<sup>nd</sup> Circuit (1998); U.S.  
26 Court of Appeals for the 3<sup>rd</sup> Circuit (2015); U.S. Court of Appeals for the 8<sup>th</sup> Circuit (1998);  
27 U.S. Court of Appeals for the 9<sup>th</sup> Circuit (2002).

28 Mr. Renzulli is not currently suspended or disbarred in any court.

1 Mr. Renzulli has applied to appear *pro hac vice* in the following action: *Paul Violet v.*  
2 *Second Amendment Sports, Inc., et al.* in the Superior Court of California County of Kern; Case  
3 No. BCV-19-101215 (TSC), *Steven C. Johnson v. Glock, Inc., et al.* in the United States District  
4 Court for the Northern District of California – San Francisco Division; Case No.: 3:20-cv-  
5 08807-WHO and *Carlomagno Buenaventura, et al. v. James River Armory, et al.* in the United  
6 States District Court for the Northern District of California – San Francisco Division; Case No.:  
7 3:21-cv-05710-TSH.

8 Mr. Renzulli is neither (a) a resident of the State of California, (b) regularly employed in  
9 the State of California, nor (c) regularly engaged in substantial business, professional, or other  
10 activities in the State of California.

11 Accompanying this Application is the declaration of Mr. Renzulli (verifying the  
12 information set forth herein, and confirming the reasons defendant Juggernaut Tactical, Inc.  
13 seeks to have Mr. Renzulli admitted in this case as counsel *pro hac vice*) and of Michael E.  
14 Gallagher, Jr. (verifying that a copy of these application papers along with a check in the amount  
15 of \$50.00 has been sent to the State Bar as required by Rule 9.40 of the California Rules of  
16 Court).

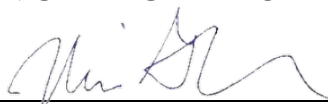
17 **III. CONCLUSION**

18 For all of the foregoing reasons, Juggernaut Tactical, Inc. respectfully requests that the  
19 Court permit Mr. Renzulli to appear *pro hac vice* in this matter.

20  
21 DATED: August 13, 2021

22  
23 Respectfully submitted,

24 EDLIN GALLAGHER HUIE + BLUM LLP

25 By:   
26 Michael E. Gallagher, Jr.  
27 Attorneys for Defendant,  
28 JUGGERNAUT TACTICAL, INC.