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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. Claster, Coordination Trial Judge

19 Coordination Proceeding Special)
20 Title (Rule 3.550)) JUDICIAL COUNCIL COORDINATION
21) PROCEEDING NO. 5167
22 GHOST GUNNER FIREARMS CASES) SUPERIOR COURT OF CALIFORNIA
23) COUNTY OF ORANGE
24 Included actions:) CASE NO. 30-2019-01111797
25)
26 Cardenas v. Ghost Gunner, Inc. dba) SUPERIOR COURT OF CALIFORNIA
27 GhoseGunner.net, et al.) COUNTY OF SAN BERNARDINO
28) CASE NO. CIVDS193452
29)
30) **MEMORANDUM OF POINTS AND**
31) **AUTHORITIES IN SUPPORT OF**
32) **APPLICATION FOR ADMISSION *PRO***
33) ***HAC VICE* OF HOWARD B. SCHILSKY**
34)
35) **Res ID: 73587791**
36)
37) Date: September 24, 2021
38) Time: 9:00 a.m.
39) Dept.: CX104
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

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

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

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

16 Mr. Schilsky's business address is: Renzulli Law Firm, LLP, One North Broadway, Suite
17 1005, White Plains, NY, 10601

18 Mr. Schilsky's residential address is: 40 Pineridge Road, White Plains, NY 10603.

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

21 State of New York (2nd Dept.) (2019); and the United States District Court for the
22 Southern District of New York (2019).

23 Mr. Schilsky is not currently suspended or disbarred in any court.

24 Mr. Schilsky has applied to appear *pro hac vice* in the following action: *Paul Violet v.*
25 *Second Amendment Sports, Inc., et al.* in the Superior Court of California County of Kern; Case
26 No. BCV-19-101215 (TSC) and *Steven C. Johnson v. Glock, Inc., et al.* in the United States
27 District Court for the Northern District of California – San Francisco Division; Case No.: 3:20-
28 cv-08807-WHO.

1 Mr. Schilsky is neither (a) a resident of the State of California, (b) regularly employed in
2 the State of California, nor (c) regularly engaged in substantial business, professional, or other
3 activities in the State of California.

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

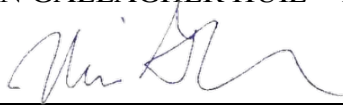
10 **III. CONCLUSION**

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

13 DATED: August 13, 2021

14
15 Respectfully submitted,

16 EDLIN GALLAGHER HUIE + BLUM LLP

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18 By: 
19 Michael E. Gallagher, Jr.
20 Attorneys for Defendant,
21 JUGGERNAUT TACTICAL, INC.
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