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| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):<br><b>Sean A. Brady</b><br>Michel & Associates, P.C.<br>180 East Ocean Blvd., Suite 200<br>Long Beach, CA 90802<br>TELEPHONE NO.: (562) 216-4444 FAX NO. (Optional): (562) 216-4445<br>E-MAIL ADDRESS (Optional): sbrady@michellawyers.com<br>ATTORNEY FOR (Name): Ghost Firearms, LLC; Blackhawk Manufacturing Group, Inc.; Ryan Beezley;<br>Bob Beezley; MFY Technical Solutions, LLC; and Thunder Guns, LLC | FOR COURT USE ONLY   |
| <b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE</b><br>STREET ADDRESS: 751 W. Santa Ana Blvd.<br>MAILING ADDRESS: 751 W. Santa Ana Blvd.<br>CITY AND ZIP CODE: Santa Ana, 92701<br>BRANCH NAME: Civil Complex Center   |  |
| PLAINTIFF/PETITIONER: Ghost Gunner Firearms Cases<br><br>DEFENDANT/RESPONDENT:   | CASE NUMBER:<br><b>JCCP 5167</b><br><br>JUDICIAL OFFICER:<br><b>William D. Cluster</b> |
| <b>NOTICE OF RELATED CASE</b>  | DEPT.:<br><b>CX102</b>   |

Identify, in chronological order according to date of filing, all cases related to the case referenced above.

1. a. Title: O'Sullivan v. Ghost Gunner, Inc., et al.
  - b. Case number: 34-2021-00302934
  - c. Court:  same as above  
 other state or federal court (name and address):
  - d. Department: 47
  - e. Case type:  limited civil  unlimited civil  probate  family law  other (specify):
  - f. Filing date: June 17, 2021
  - g. Has this case been designated or determined as "complex?"  Yes  No
  - h. Relationship of this case to the case referenced above (check all that apply):
    - involves the same parties and is based on the same or similar claims.
    - arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
    - involves claims against, title to, possession of, or damages to the same property.
    - is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
    - Additional explanation is attached in attachment 1h
  - i. Status of case:
    - pending
    - dismissed  with  without prejudice
    - disposed of by judgment
2. a. Title:
  - b. Case number:
  - c. Court:  same as above  
 other state or federal court (name and address):
  - d. Department:

|  |                           |
|--|---------------------------|
| PLAINTIFF/PETITIONER: Ghost Gunner Firearms Cases<br>DEFENDANT/RESPONDENT: | CASE NUMBER:<br>JCCP 5167 |
|--|---------------------------|

2. (continued)

- e. Case type:  limited civil  unlimited civil  probate  family law  other (specify):
- f. Filing date:
- g. Has this case been designated or determined as "complex?"  Yes  No
- h. Relationship of this case to the case referenced above (check all that apply):
  - involves the same parties and is based on the same or similar claims.
  - arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
  - involves claims against, title to, possession of, or damages to the same property.
  - is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
  - Additional explanation is attached in attachment 2h
- i. Status of case:
  - pending
  - dismissed  with  without prejudice
  - disposed of by judgment

3. a. Title:

b. Case number:

- c. Court:  same as above
- other state or federal court (name and address):

d. Department:

- e. Case type:  limited civil  unlimited civil  probate  family law  other (specify):

f. Filing date:

- g. Has this case been designated or determined as "complex?"  Yes  No

h. Relationship of this case to the case referenced above (check all that apply):

- involves the same parties and is based on the same or similar claims.
- arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
- involves claims against, title to, possession of, or damages to the same property.
- is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
- Additional explanation is attached in attachment 3h

i. Status of case:

- pending
- dismissed  with  without prejudice
- disposed of by judgment

4.  Additional related cases are described in Attachment 4. Number of pages attached: \_\_\_\_\_

Date: August 13, 2021

Sean A. Brady

(TYPE OR PRINT NAME OF PARTY OR ATTORNEY)



(SIGNATURE OF PARTY OR ATTORNEY)

|   |              |
|---|--------------|
| PLAINTIFF/PETITIONER: Ghost Gunner Firearms Cases | CASE NUMBER: |
| DEFENDANT/RESPONDENT:                             | JCCP 5167    |

**PROOF OF SERVICE BY FIRST-CLASS MAIL  
NOTICE OF RELATED CASE**

**(NOTE: You cannot serve the Notice of Related Case if you are a party in the action. The person who served the notice must complete this proof of service. The notice must be served on all known parties in each related action or proceeding.)**

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is *(specify)*:

180 East Ocean Blvd., Suite 200, Long Beach, California 90802

2. I served a copy of the *Notice of Related Case* by enclosing it in a sealed envelope with first-class postage fully prepaid and *(check one)*:

- a.  deposited the sealed envelope with the United States Postal Service.
- b.  placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Related Case* was mailed:

- a. on *(date)*: August 9, 2021
- b. from *(city and state)*: Long Beach, California

4. The envelope was addressed and mailed as follows:


- |  |   |
|--|---|
| <p>a. Name of person served:<br/>Caitlin M. Nelson<br/>Street address: 275 Battery St., 29th Floor<br/>City: San Francisco<br/>State and zip code: CA 94111-3339</p> | <p>c. Name of person served:<br/>Street address:<br/>City:<br/>State and zip code:</p>      |
| <p>b. Name of person served:<br/><br/>Street address:<br/>City:<br/>State and zip code:</p>  | <p>d. Name of person served:<br/><br/>Street address:<br/>City:<br/>State and zip code:</p> |

Names and addresses of additional persons served are attached. *(You may use form POS-030(P).)*

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

Date: August 13, 2021

Laura Palmerin  
(TYPE OR PRINT NAME OF DECLARANT)

  
(SIGNATURE OF DECLARANT)

|   |                           |
|---|---------------------------|
| SHORT TITLE:<br>Ghost Gunner Firearms Cases | CASE NUMBER:<br>JCCP 5167 |
|---|---------------------------|

**ATTACHMENT** (Number): 1h

*(This Attachment may be used with any Judicial Council form.)*

While the related case, O’Sullivan v. Ghost Gunner, Inc., et al., arises from a different set of facts than the two coordinated wrongful death and personal injury actions currently before this Court, it concerns the exact same legal issues. Plaintiffs in all three cases allege causes of action for negligence, negligent entrustment, public nuisance, and alleged violation of several consumer protection statutes (Bus. & Prof. Code § 17200/17500). All cases involve the alleged assembly of semi-automatic rifles using a variety of component parts, including unfinished lower receivers of purportedly unknown origin, which were criminally misused to cause Plaintiffs’ respective injuries. All Plaintiffs seek to hold various manufacturers, distributors and retailers of unfinished lower receiver parts and kits – which were legal to manufacture and sell – liable for the criminal conduct of third parties. And all Plaintiffs are attempting to apply a market share liability theory against Defendants, which is based on the false assumption that the origin of the products cannot be identified and that the products are fungible goods. Plaintiffs market share liability theory, however, fails as a matter of law for two reasons. First, Defendants’ products are demonstrably not fungible and, second, Plaintiffs fail to allege that Defendants constitute the universe of manufacturers/vendors of the products. The Defendants in all three cases are mostly the same (with some additional defendants named in the O’Sullivan matter), and the legal defenses will likely be nearly identical in all three actions.

*(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)*

Page 1 of 1  
*(Add pages as required)*

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 August 13, 2021, I served the foregoing document(s) described as:

8 **NOTICE OF RELATED CASE**

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 August 13, 2021, at Long Beach, California.

20  
21  
22  
23  
24  
25  
26  
27  
28  
  
Laura Palmerin

1 **SERVICE LIST**

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