

BY FAX

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**FILED/ENDORSED**  
AUG. 13 2021  
By:                      I. Romo  
Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SACRAMENTO

11 KELLEY and DENIS O'SULLIVAN, in  
12 their Individual Capacity and KELLY  
13 O'SULLIVAN as Administrator of the  
Estate of TARA O'SULLIVAN, Deceased,

14 Plaintiffs,

15 v.

16 GHOST GUNNER INC., d/b/a  
GHOSTGUNNER.NET;  
17 BLACKHAWK MANUFACTURING  
GROUP INC., d/b/a  
18 80PERCENTARMS.COM;  
19 RYAN BEEZLEY and BOB BEEZLEY,  
d/b/a RBTACTICALTOOLING.COM;  
20  
21 GHOST AMERICA LLC, d/b/a  
GHOSTGUNS.COM;  
22 GHOST FIREARMS LLC, d/b/a GRID  
DEFENSE and GHOSTRIFLES.COM;  
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24 JUGGERNAUT TACTICAL INC., d/b/a  
JTACTICAL.COM;  
25 MFY TECHNICAL SOLUTIONS LLC,  
d/b/a 5DTACTICAL.COM;  
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27 TACTICAL GEAR HEADS LLC, d/b/a  
80-LOWER.COM; AR-  
15LOWERRECEIVERS.COM; and  
28 80LOWERJIG.COM;

No. 34-2021-00302934

**PLAINTIFFS' DECLARATION AND  
REQUEST FOR EXTENSION OF TIME  
TO SERVE NAMED DEFENDANT AND  
FILE PROOF OF SERVICE**

**Department: 40  
Judge: Richard K. Sueyoshi**

1 JAMES TROMBLEE, JR., d/b/a  
2 USPATRIOTARMORY.COM;  
3 INDUSTRY ARMAMENT INC., d/b/a  
4 AMERICANWEAPONSCOMPONENTS.  
COM;  
5 THUNDER GUNS LLC, d/b/a  
6 THUNDERTACTICAL.COM;  
7 POLYMER80, INC., d/b/a  
POLYMER80.COM and P80 TACTICAL;  
8 JSD SUPPLY, d/b/a JSDSUPPLY.COM  
and 80PERCENTGUYS.COM;  
9 JAMES MADISON TACTICAL LLC,  
10 d/b/a  
JAMESMADISONTACTICAL.COM;  
11 WM. C. ANDERSON, INC., d/b/a  
12 ANDERSONMANUFACTURING.COM;  
13 MATRIX ARMS, d/b/a  
MATRIXARMS.COM;  
14 M-16 PARTS SUPPLY LLC, d/b/a M-  
15 16PARTS.COM; and  
16 DOES 1-50,  
17 Defendants.

- 18
- 19 1. I, CAITLIN M. NELSON, declare:
- 20 2. I am an attorney at law duly licensed to practice before all Courts of the State of  
21 California, and an Associate with the law firm Lief Cabraser Heimann & Bernstein, LLP,  
22 attorneys of record for plaintiffs herein.
- 23 3. Plaintiffs caused to be filed in this Court their Complaint for Damages on June 17,  
24 2021, against the above-named seventeen defendants.
- 25 4. Plaintiffs have served all defendants except defendant Ghost America LLC (d/b/a  
26 GhostGuns.com).
- 27 5. The process server retained by plaintiffs' counsel to serve defendants made three  
28 unsuccessful attempts to serve the registered agent for service at the address identified with the

1 Secretary of State for defendant Ghost America LLC. It appears the agent is actively evading  
2 service. The details of the attempts to serve are outlined in the executed Declaration of Due  
3 Diligence, a copy of which is attached hereto as Exhibit A.

4 6. Therefore, plaintiffs seek an extension to serve defendant Ghost America LLC, for  
5 an additional period of time up to and including October 17, 2021.

6 I declare under penalty of perjury, under the laws of the State of California, that the  
7 foregoing is true and correct. Executed August 13, 2021 at Oakland, California.

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10 CAITLIN M. NELSON  
11 Attorneys for Plaintiffs  
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# **EXHIBIT A**

Attorney or Party without Attorney: <b>Robert J. Nelson, Esq., SBN: Bar No.132797</b> <b>LIEFF, CABRASER, HEIMANN &amp; BERNSTEIN</b> 275 Battery Street 29th Floor San Francisco, CA 94111 TELEPHONE No.: (415) 956-1000      E-MAIL ADDRESS (Optional): <a href="mailto:melson@lchb.com">melson@lchb.com</a> FAX No. (Optional): (415) 956-1008				FOR COURT USE ONLY	
Attorney for: Plaintiffs			Ref No. or File No.: 4162-0001		
Insert name of Court, and Judicial District and Branch Court: Superior Court Of California, County of Sacramento - Gordon D. Schaber County Courthouse					
Petitioner: Kelley O'Sullivan, et al. Respondent: Ghost Gunner Inc. et al.					
<b>DECLARATION OF DUE DILIGENCE</b>		HEARING DATE:	TIME:	DEPT.:	CASE NUMBER: 34-2021-00302934

After due search, careful inquiry and diligent attempts at the following address(es), I have not been able to effect service of said process on: **GHOST AMERICA LLC, d/b/a GHOSTGUNS.COM**

Documents: **Summons; Complaint; Alternative Dispute (ADR) package; Civil Case Cover Sheet; Order Re: Delay in Scheduling Initial Case Management Conference;**

Date	Time	Results
7/14/2021	1:03 PM	Business 23470 Cambridge Rd, Yorba Linda, CA 92887-4703 This location is a downstairs apartment unit. There's a camera pointed at front door. No response and no activity seen or heard inside. Can see furniture and other items on patio. No neighbor information.
7/14/2021	7:40 PM	Business 23470 Cambridge Rd, Yorba Linda, CA 92887-4703 There was no answer at the door. There was no movement or activity observed on the property. The blinds are all closed and I cannot tell if anybody was home. There was no information from the neighbor.
7/15/2021	7:25 AM	Business 23470 Cambridge Rd, Yorba Linda, CA 92887-4703 There was no answer at the door and no changes to the property

Fee for Service: \$ .00

**N** County: **Orange**  
 Registration No.: **1530**  
**Nationwide Legal, LLC**  
 859 Harrison Street, Suite A  
 San Francisco, CA 94107  
 (415) 351-0400

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on July 19, 2021.



Signature: \_\_\_\_\_

**Frank Harrigan**

**DUE DILIGENCE REPORT**

Order#: SF53278

1 **PROOF OF SERVICE**

2 I am a citizen of the United States and a resident of the County of Alameda, State of  
3 California. I am over the age of 18 years and not a party to the within action; my business mailing  
4 address is 275 Battery St, 29<sup>th</sup> Floor, San Francisco, California 94111. I am familiar with this  
5 firm's practice whereby the mail, after being placed in a designated area, is given the appropriate  
6 postage and is deposited in a U.S. mailbox after the close of the day's business.

7 On the date indicated below, I served the document(s) designated below on all parties in  
8 said action by placing a true copy thereof in a sealed envelope in the designated area for  
9 out-going mail addressed as set forth below:

- 10 • On the date indicated below, I served the document(s) designated below on all  
11 parties in said action by placing a true copy thereof in a sealed envelope and  
12 mailed it via overnight mail with Federal Express addressed as set forth below:
- 13 • On the date indicated below, I personally served the document(s) designated below  
14 by transmitting a true copy thereof via electronic mail in .pdf format as an e-mail  
15 attachment to each addressee set forth below:
- 16 • On the date indicated below, I served the document(s) designated below by  
17 transmitting a true copy thereof via Fax to the person(s) and at the Fax number(s)  
18 set forth below:

19 **PLAINTIFFS' DECLARATION AND REQUEST FOR EXTENSION OF TIME TO**  
20 **SERVE NAMED DEFENDANT AND FILE PROOF OF SERVICE**

21 22 23 24 25 26 27 28	Howard Schilsky Renzulli Law Firm, LLP One N. Broadway, Suite 1005 White Plains, NY 10601 Email: hschilsky@renzullilaw.com Telephone: 914-285-0700 Facsimile : 914-285-1213  <i>Attorneys for Defendant, JUGGERNAUT TACTICAL, INC. d/b/a JTACTICAL.COM</i>  (VIA EMAIL ONLY)	Sean A. Brady Michel & Associates, P.C. Attorneys at Law 180 East Ocean Boulevard, Suite 200 Long Beach, CA 90802 Email: sbrady@michellawyers.com Telephone: 562-216-4444 Facsimile : 562-216-4445  <i>Attorneys for Defendants, RYAN BEEZLEY AND BOB BEEZLEY d/b/a RBACTICIALTOOLING.COM, THUNDER GUNS LLC, d/b/a THUNDERTACTICAL.COM, GHOST FIREARMS LLC, d/b/a GRID DEFENSE and GHOSTRIFLES.COM, and POLYMER80, INC., d/b/a POLYMER80.COM and P80 TACTICAL</i>  (VIA EMAIL ONLY)
	GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET 1101 W 34 <sup>th</sup> St, PMB 240 Austin, TX 78705-1907  (VIA REGULAR MAIL ONLY)	BLACKHAWK MANUFACTURING GROUP INC., d/b/a 80PERCENTARMS.COM 12272 Monarch St Garden Grove, CA 92841  (VIA REGULAR MAIL ONLY)

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<p>MFY TECHNICAL SOLUTIONS LLC, d/b/a SDTACTICAL.COM 24 Asylum Street Milford, MA 01757-1266  (VIA REGULAR MAIL ONLY)</p>	<p>TACTICAL GEAR HEADS LLC, d/b/a 80- LOWER.COM; AR- 15LOWERRECEIVERS.COM 11374 Falling Water Way Fishers, IN 46037-4077  (VIA REGULAR MAIL ONLY)</p>
<p>JSD SUPPLY, d/b/a JSDSUPPLY.COM and 80PERCENTGUYS.COM 102 Patriot Lane Butler, PA 16001-0210  (VIA REGULAR MAIL ONLY)</p>	<p>INDUSTRY ARMAMENT INC., d/b/a AMERICANWEAPONSCOMPONENTS.COM CT Corp Trust Co 1209 N Orange Street Wilmington, DE 19801-1120  (VIA REGULAR MAIL ONLY)</p>
<p>JAMES MADISON TACTICAL LLC, d/b/a JAMESMADISONTACTICAL.COM 2310 Michael Ave Richland, WA 99352-6102  (VIA REGULAR MAIL ONLY)</p>	<p>WM. C. ANDERSON, INC., d/b/a ANDERSONMANUFACTURING.COM 1743 Anderson Blv Hebron, KY 41048-9769  (VIA REGULAR MAIL ONLY)</p>
<p>MATRIX ARMS, d/b/a MATRIXARMS.COM 75 Winter St Claremont, NH 03743-5054  (VIA REGULAR MAIL ONLY)</p>	<p>David A. Melton Ryan Erdreich Daniel Phung Potter Scott Law Firm 350 University Ave, Suite 200 Sacramento, CA Email: <a href="mailto:dmelton@porterscott.com">dmelton@porterscott.com</a> <a href="mailto:rerdreich@pisciotti.com">rerdreich@pisciotti.com</a> <a href="mailto:dphung@porterscott.com">dphung@porterscott.com</a> Telephone: 916.929.1481 Facsimile : 916.927.3706  <i>Attorneys for Defendants, JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM</i>  (VIA EMAIL ONLY)</p>
<p>M-16 PARTS SUPPLY LLC, d/b/a M- 16PARTS.COM c/o Terry J. Weisflog 5918 England Avenue Orlando, FL 32808  (VIA REGULAR MAIL ONLY)</p>	

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I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed August 13, 2021, at Oakland, California.

*Caitlin Nelson*  
CAITLIN M NELSON  
Attorneys for Plaintiffs