

BY FAX

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10 Thunder Guns, LLC, Ghost Firearms, LLC, and
11 Polymer80, Inc.

FILED/ENDORSED

AUG 16 2021

By K. Madden, Deputy Clerk

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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

KELLEY and DENNIS O'SULLIVAN, in
their Individual Capacity and KELLY
O'SULLIVAN as Administrator of the
Estate of TARA O'SULLIVAN, Deceased,

Plaintiffs,

vs.

GHOST GUNNER INC., d/b/a
GHOSTGUNNER.NET, et al.,

Defendants.

Case No. 34-2021-00302934-CU-PO-GDS

[Assigned to the Honorable Judge Russell L.
Hom; Dept. 47]

JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO STAY CASE

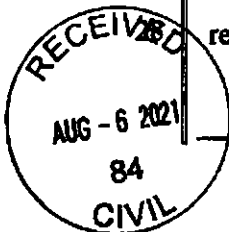
Complaint Filed: June 17, 2021

Defendants Ryan Beezley, Bob Beezley, Ghost Firearms, LLC, Thunder Guns, LLC, and
Polymer80, Inc., and Plaintiffs, by and through their respective counsel of record, hereby
stipulate:

WHEREAS, on June 17, 2021, Plaintiffs filed their complaint alleging five causes of
action against eighteen named defendants;

WHEREAS, as of August 4, 2021, while most defendants have been served in this matter,
a few defendants have yet to receive service, despite diligent efforts to do so;

WHEREAS, the responsive pleading deadline for some defendants is approaching, while
those defendants that have yet to receive service do not currently have a deadline to file a
responsive pleading;



KM

1 WHEREAS, in some cases, multiple defendants are represented by the same counsel;

2 WHEREAS, the parties are in agreement that given the large number of named defendants
3 and that most will have different service dates once they are served, differing responsive pleading
4 deadlines are not in the interests of the parties nor in the interests of judicial economy should
5 multiple defendants pursue demurrers or motions to strike;

6 WHEREAS, counsel for other defendants who have been served or are otherwise aware of
7 the Complaint have been notified of this requested stipulation and have either expressed support
8 for it or no objections to it;

9 THEREFORE, the parties jointly request that this matter be stayed for 45 days, during
10 which time plaintiffs will continue to try to perfect service and defendants shall organize
11 themselves and consider ways to efficiently present their defense of the suit, including by, for
12 example, the filing of joint responsive pleadings. The parties will also meet and confer on
13 establishing a schedule for the filing of responsive pleadings. If the parties are unable to stipulate
14 to a schedule, they will request a case management conference with this Court to ensure that the
15 case moves forward in a timely fashion.

16 IT IS SO STIPULATED.

17
18 Dated: August 4, 2021

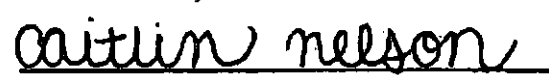
MICHEL & ASSOCIATES, P.C.


Sean A. Brady

Attorneys for Defendants Ryan Beezley and Bob
Beezley, Thunder Guns, LLC, Ghost Firearms,
LLC, and Polymer80, Inc.

22
23 Dated: August 4, 2021

LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP


Caitlin M. Nelson
Attorneys for Plaintiffs

1 **PROPOSED ORDER**

2 Pursuant to the Parties' stipulation and good cause shown, it is hereby ORDERED that:

3 This matter is stayed for 45 days, during which time plaintiffs will continue to perfect
4 service on all defendants, defendants will meet and confer with one another on ways to coordinate
5 the filing of joint responsive pleadings to the Complaint, and the parties will propose a briefing
6 schedule applicable to all defendants for the filing of pleadings responsive to the Complaint. ~~If the~~
7 ~~parties are not able to stipulate to a briefing schedule, they will request a case management~~
8 ~~conference with this Court to ensure that the case moves forward in a timely fashion.~~

9 *BRIEFING SCHEDULES FOR LAW MOTION MATTERS MUST BE APPROVED*
10 *BY THE LAW AND MOTION DEPT. THIS DEPT. WILL SET CMT.*
11 **IT IS SO ORDERED. SEPARATE ORDER.**

12 Dated: AUG 16 2021

13 *[Signature]*
14 JUDGE RICHARD K. SUEYOSHI
15 Judge of the Superior Court



1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF SACRAMENTO

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 4, 2021, I served the foregoing document(s) described as:

8 **JOINT STIPULATION AND [PROPOSED] ORDER TO STAY 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 Robert J. Nelson
14 rnelson@lchb.com
15 Caitlin M. Nelson
16 cnelson@lchb.com
17 Lieff Cabraser Heimann & Bernstein, LLP
18 275 Battery Street, 29th Floor
19 San Francisco, CA 94111-3339
20 Tel.: (415) 956-1000
21 *Attorneys for Plaintiffs*

22 X (BY MAIL) As follows: I am "readily familiar" with the firm's practice of collection and
23 processing correspondence for mailing. Under the practice it would be deposited with the
24 U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach,
25 California, in the ordinary course of business. I am aware that on motion of the party
26 served, service is presumed invalid if postal cancellation date is more than one day after
27 date of deposit for mailing an affidavit.

28 X (STATE) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

Executed on August 4, 2021, at Long Beach, California.

24 
25 Laura Palmerin