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7 Attorneys for Plaintiffs
Francisco Gudino Cardenas and McFayden, et al.
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF ORANGE
11

12 FRANCISCO GUDINO CARDENAS, an
individual, and

13 TROY MCFAYDEN, in his Individual Capacity,
14 and as Heir at Law and Successor in Interest to
MICHELLE MCFADYEN, Deceased, ET AL.

15 Plaintiffs,

16 v.
17

18 GHOST GUNNER INC., d/b/a
GHOSTGUNNER.NET;

19 DEFENSE DISTRIBUTED d/b/a
GHOSTGUNNER.NET

20 CODY WILSON d/b/a GHOSTGUNNER.NET

21 BLACKHAWK MANUFACTURING GROUP
22 INC., d/b/a 80PERCENTARMS.COM;

23 RYAN BEEZLEY and BOB BEEZLEY, d/b/a
RBTACTICALTOOLING.COM;

24 GHOST AMERICA LLC, d/b/a
25 GHOSTGUNS.COM;

26 GHOST GUNS LLC, d/b/a GRID DEFENSE
and GHOSTRIFLES.COM;

27 JUGGERNAUT TACTICAL INC., d/b/a
28 JTACTICAL.COM;

Case No. JCCP 5167

Superior Court of California County of
Orange; Case No. 30-2019-01111797-CU-
PO-CJC

Superior Court of California County of San
Bernardino; Case No. CIV-DS-1935422

**JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: September 24, 2021
Time: 1:30pm
Dept.: CX 102
Judge: Hon. William D. Cluster

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MFY TECHNICAL SOLUTIONS LLC, d/b/a
5DTACTICAL.COM;

TACTICAL GEAR HEADS LLC, d/b/a 80-
LOWER.COM; AR-
15LOWERRECEIVERS.COM; and
80LOWERJIG.COM;

JAMES TROMBLEE, JR., d/b/a
USPATRIOTARMORY.COM;

INDUSTRY ARMAMENT INC., d/b/a
AMERICANWEAPONSCOMPONENTS.CO
M;

THUNDER GUNS LLC, d/b/a
THUNDERTACTICAL.COM;

DOES 1-100, Inclusive

Defendants.

1 The Parties jointly submit this Case Management Conference Statement to update the
2 Court on events since the last conference. On or about August 23, 2021, Defendants requested
3 that Plaintiffs in the present matter and Plaintiffs in *Kelley O'Sullivan, et al. v. Ghost Gunner,*
4 *Inc., et al.*, Case No. 34-202100302934-CU-PO-GDS, pending in the Superior Court of
5 Sacramento County ("the O'Sullivan case"), stipulate to adding the *O'Sullivan* Case to the
6 presently coordinated matters for pre-trial purposes only. Counsel for the *O'Sullivan* Case
7 Plaintiffs responded that they would oppose coordination. Defendants filed their Petition for
8 Inclusion of Add-On Case on September 13, 2021. Plaintiffs in the present matter and in the
9 *O'Sullivan* Case will file their opposition to that Petition on September 22, 2021.

10 The *O'Sullivan* Case is currently stayed until September 30, 2021 and the plaintiffs in the
11 *O'Sullivan* Case have agreed to stipulate to maintain that stay in place until this Court rules on
12 Defendants' Petition for Inclusion of Add-On Case. Plaintiffs in the present coordinated cases,
13 however, oppose a further continuance of the cases.

14 As to all other issues, including a stay of discovery through briefing on demurrers and
15 reservation of rights to request bifurcation, the Parties maintain the same positions stated in their
16 respective previously filed CMC Statements in August 2021.

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Respectfully submitted,

Dated: September 17, 2021

AMY K. VAN ZANT
SHAYAN SAID
ANNA Z. SABER
Orrick, Herrington & Sutcliffe LLP

By: /s/ Amy K. Van Zant
AMY K. VAN ZANT
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Francisco Gudino Cardenas and
Troy McFayden, et al. and Liaison Counsel
for Plaintiffs

By: /s/ Sean A. Brady
SEAN A. BRADY
Attorneys for Defendants
Blackhawk Manufacturing Group, Inc.;
Ryan Beezley and Bob Beezley; Ghost
Firearms, LLC;
MFY Technical Solutions, LLC; and Thunder
Guns, LLC and Liaison Counsel for Defendants

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9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF ORANGE

12 GHOST GUNNER FIREARMS CASES

13 Included actions:

14 30-2019-01111797-CU-PO-CJC *Cardenas v. Ghost*
15 *Gunner, Inc. dba GhostGunner.net, et al.*

16 CIV-DS-1935422 *McFayden, et al. v. Ghost Gunner,*
17 *Inc., dba GhostGunner.net, et al.*

JCCP No. 5167

Superior Court of California
County of Orange
Case No. 30-2019-01111797-CU-PO-
CJC

Superior Court of California
County of San Bernardino
Case No. CIV-DS-1935422

18 **PROOF OF SERVICE**

19 Dept.: CX 104
20 Judge: Hon. William D. Claster

PROOF OF SERVICE

I am employed in the County of San Mateo, State of California. I am over the age of eighteen years old and not a party to this action. My business address is Orrick, Herrington & Sutcliffe LLP, 1000 Marsh Rd., Menlo Park, CA 94025.

On September 17, 2021, I served the following document(s) entitled:

- **JOINT CASE MANAGEMENT CONFERENCE STATEMENT**

on all interested parties to this action in the manner described as follows:

X	(VIA EMAIL) I caused to be transmitted via electronic mail the document(s) listed above to the electronic address(es) set forth below.
	(VIA U.S. MAIL) By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Menlo Park, California addressed as set forth below.

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*Attorneys for Defendant
POLYMER80, INC.*

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

Executed on September 17, 2021 at Fremont, California.

/s/ Sema Virrueta

Sema Virrueta