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

**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 Richard K.  
Sueyoshi; Dept. 40]*

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO SET CASE MANAGEMENT  
CONFERENCE**

Complaint Filed: June 17, 2021

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

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

5 WHEREAS, on August 16, 2021, the Court issued an Order staying the case until  
6 September 30, 2021, to permit Plaintiffs time to serve the large number of named defendants and  
7 to avoid having multiple responsive pleading deadlines for those defendants;

8 WHEREAS, Defendants filed a petition to coordinate this matter as an Add-On case with  
9 the *Ghost Gunner Firearms Cases*, Judicial Council Coordination Proceeding No. 5167, and  
10 Defendants jointly requested with Plaintiffs that this Court maintain the previous stay until that  
11 petition was ruled on, at which point the parties would request a Case Management Conference to  
12 discuss with this Court how to proceed in this matter;

13 WHEREAS, on November 15, 2021, Judge William D. Claster denied Defendants'  
14 petition to coordinate this matter as an Add-On case with the *Ghost Gunner Firearms Cases*,  
15 Judicial Council Coordination Proceeding No. 5167;

16 WHEREAS, all Defendants have now been served in this matter but not all have appeared;

17 WHEREAS, this Court ordered the Plaintiffs and the Defendants who have appeared to  
18 propose a briefing schedule for responsive pleadings by December 6, 2021;

19 WHEREAS, after meeting and conferring, Plaintiffs and the Defendants who have  
20 appeared agree that it would benefit the Court and all parties for the Court to hold a Case  
21 Management Conference with all parties before establishing deadlines in this matter;

22 THEREFORE, Plaintiffs and the Defendants who have appeared jointly request that this  
23 Court set a Case Management Conference for all parties in order to set a briefing schedule for  
24 responsive pleadings and all other case deadlines that may be relevant at this time.

25 IT IS SO STIPULATED.

26 ///

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28 ///

1 Dated: December 6, 2021

**MICHEL & ASSOCIATES, P.C.**

2 

3 Sean A. Brady  
4 *Attorneys for Defendants Ryan Beezley and Bob*  
5 *Beezley, Thunder Guns, LLC, and Ghost*  
6 *Firearms, LLC*

7 Dated: December 6, 2021

**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

8 

9 Caitlin M. Nelson  
10 *Attorneys for Plaintiffs*

11 Dated: December 6, 2021

**GREENSPOON MARDER LLP**

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13 Germain D. Labat  
14 *Counsel to Defendant Polymer80, Inc.*

15  
16  
17 **PROPOSED ORDER**

18 Pursuant to the Parties' stipulation and good cause shown, it is hereby ORDERED that:  
19 A Case Management Conference is set for: \_\_\_\_\_.

20  
21 **IT IS SO ORDERED.**

22 Dated: \_\_\_\_\_

23 \_\_\_\_\_  
24 Honorable Judge Richard K. Sueyoshi  
25 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 December 7, 2021, I served the foregoing document(s) described as:

8 **JOINT STIPULATION AND [PROPOSED] ORDER TO SET CASE**  
9 **MANAGEMENT CONFERENCE**

10 on the interested parties in this action by placing  
11 [ ] the original  
12 [X] a true and correct copy  
13 thereof by the following means, addressed as follows:

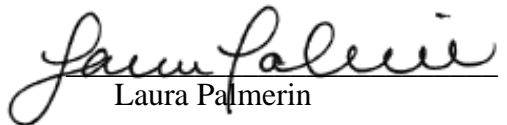
14 Please see Attached Service List.

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

21 X (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic  
22 transmission. Said transmission was reported and completed without error.

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

25 Executed on December 7, 2021, at Long Beach, California.

26   
27 Laura Palmerin  
28

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