

GERMAIN D. LABAT (SBN 203907)  
germain.labat@gmlaw.com  
GREENSPOON MARDER LLP  
1875 Century Park East, Suite 1900  
Los Angeles, California 90067  
Telephone: (323) 880-4520  
Facsimile: (954) 771-9264

JAMES J. McGUIRE (New York SBN 2106664)  
(Pro Hac Vice Application Pending)  
james.mcguire@gmlaw.com  
MICHAEL MARRON (New York SBN 5146352)  
(Pro Hac Vice Application Forthcoming)  
michael.marron@gmlaw.com  
GREENSPOON MARDER LLP  
590 Madison Avenue, Suite 1800  
New York, New York 10022  
Telephone: (212) 524-5040  
Facsimile: (212) 524-5050

Attorneys for Defendant  
POLYMER80, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ORANGE

FRANCISCO GUDINO CARDENAS, an  
individual; and  
TROY MCFADYEN, in his Individual Capacity,  
and as Heir at Law and Successor in Interest to  
MICHELLE MCFADYEN, Deceased, ET AL.

Plaintiffs,

vs.

GHOST GUNNER INC., d/b/a  
GHOSTGUNNER.NET; DEFENSE  
DISTRIBUTED d/b/a GHOSTGUNNER.NET;  
CODY WILSON d/b/a GHOSTGUNNER.NET;  
BLACKHAWK MANUFACTURING GROUP  
INC., d/b/a 80PERCENTARMS.COM; RYAN  
BEEZLEY and BOB BEEZLEY d/b/a  
RBTACTICALTOOLING.COM; GHOST  
AMERICA LLC, d/b/a GHOSTGUNS.COM;  
GHOST GUNS LLC, d/b/a GRID DEFENSE and  
GHOSTRIFLES.COM; JUDGGERNAUT  
TACTICAL INC. d/b/a JTACTICAL.COM; MFY  
TECHNICAL SOLUTIONS LLC, d/b/a  
SDTACTICAL.COM; TACTICAL GEAR HEADS  
LLC, d/b/a 80-LOWER.COM; AR-

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF ORANGE  
CENTRAL JUSTICE CENTER

DEC 14 2021

DAVID H. YAMASAKI, Clerk of the Court

BY:  DEPUTY

Case No. JCCP 5167

[Coordinated Cases CIVDS 1935422 date  
filed 11/14/2019, and 30-2019-01111797-  
CU-PO-CJC date filed 11/14/2019]

[Assigned for all purposes to Hon. William  
Claster, Department CX 104]

Filing Date: March 22, 2021

Trial Date: Not Yet Set

**[PROPOSED] ORDER ADMITTING  
JAMES J. McGUIRE, ESQ. TO APPEAR  
AS COUNSEL TO DEFENDANT  
POLYMER80, INC. PRO HAC VICE  
IN THIS ACTION**

Date: December 10, 2021

Time: 9:00 a.m.

Dept: CX104

Res. ID: 1000236622

**[PROPOSED] ORDER ADMITTING JAMES J. McGUIRE, ESQ. TO APPEAR AS COUNSEL TO  
DEFENDANT POLYMER80, INC. PRO HAC VICE IN THIS ACTION**

1 15LOWERRECEIVERS.COM and  
2 80LOWERJIG.COM; JAMES TROMBLEE, JR.,  
3 d/b/a USPATRIOTARMORY.COM; INDUSTRY  
4 ARMAMENT INC., d/b/a  
5 AMERICANWEAPONSCOMPONENTS.COM;  
6 THUNDER GUNS LLC, d/b/a  
7 THUNDERTACTICAL.COM;  
8 POLYMER80, INC.; and  
9 DOES 2 through 100, inclusive,  
10 Defendants.  
11

12 The Application of James J. McGuire, Esq. for admission as counsel to defendant  
13 Polymer80, Inc. *pro hac vice* in this action was scheduled for hearing before Honorable William  
14 Cluster in Department CX104 on October 22, 2021; and

15 GOOD CAUSE HAVING BEEN SHOWN:

16 IT IS HEREBY ORDERED THAT the application of James J. McGuire, Esq. to appear as  
17 counsel to defendant Polymer80, Inc. *pro hac vice* in the above-referenced action is GRANTED.

18 The office address for James J. McGuire is Greenspoon Marder LLP ("Greenspoon  
19 Marder"), 590 Madison Avenue, Suite 1800, New York, New York 10022, telephone number (212)  
20 524-5040, and facsimile number (212) 524-5050. Both the New York and California Offices of  
21 Greenspoon Marder should receive copies of all pleadings in this case.

22 Dated: September 21, 2021



23  
24  
25  
26  
27  
28  
Honorable William Cluster

**PROOF OF SERVICE**

*Francisco Gudino Cardenas, et al. v. Ghost Gunner Inc., et al.*

Case No. JCCP 5167

STATE OF CALIFORNIA           )  
  ) ss  
COUNTY OF LOS ANGELES       )

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the action. My business address is 1875 Century Park East, Suite 1900, Los Angeles, CA 90067. On November 9, 2021, I served the document(s) on the interested parties in this action as follows:

**[PROPOSED] ORDER ADMITTING JAMES J. McGUIRE TO APPEAR  
PRO HAC VICE**

By placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

**(SEE ATTACHED SERVICE LIST)**

- ☐ **BY ELECTRONIC TRANSMISSION.** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the document to be sent to the persons at the e-mail addresses listed herein. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- ☒ **BY ELECTRONIC MAIL-** I caused the foregoing document(s) to be served on all parties at the e-mail addresses listed herein.
- ☒ **BY MAIL:** The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after service of deposit for mailing in affidavit.
- ☐ **BY OVERNIGHT DELIVERY:** By causing such envelope to be deposited or delivered in a box or other facility regularly maintained by Federal Express authorized to receive documents, or delivering to a courier or driver authorized by said express service carrier to receive documents, the copy of the foregoing document in a sealed envelope designated by the express service carrier, addressed as stated above, with fees for overnight (next business day) delivery paid or provided for and causing such envelope to be delivered by said express service carrier.
- ☒ [State] I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 9, 2021, at Los Angeles, California.



Lorraine Corrales

**SERVICE LIST**

*Francisco Gudino Cardenas, et al. v. Ghost Gunner Inc., et al.*  
Case No. JCCP 5167

Amy K. Van Zant, Esq.  
Shayan Said, Esq.  
Anna Z. Saber

*Attorneys For Plaintiffs*

*Francisco Gudino Cardenas and McFadyen, et al.*

**ORRICK, HERRINGTON  
& SUTCLIFFE LLP**

1000 Marsh Road  
Menlo Park, CA 94025-1015

Tel: 650.614.7400

Facsimile: 650.614.7401

E-Mail: [avanzant@orrick.com](mailto:avanzant@orrick.com)

[ssaid@orrick.com](mailto:ssaid@orrick.com)

[annasaber@orrick.com](mailto:annasaber@orrick.com)

Craig A. Livingston

*Attorney for Defendant*

Chrystal L. Van Der Putten

**TACTICAL GEAR HEADS LLC**

**LIVINGSTON LAW FIRM**

1600 South Main Street, Suite 280

Walnut Creek, CA 94596

Tel: 925.952.9880

Fax: 925.952.9881

E-Mail: [clivingston@livingstonlawyers.com](mailto:clivingston@livingstonlawyers.com)

[cvanderputten@livingstonlawyers.com](mailto:cvanderputten@livingstonlawyers.com)

Dugan Barr

*Attorney for Plaintiffs*

Douglas Mudford

Estee Lewis

Catie Bar

Brandon Storment

**BARR & MUDORD, LLP**

1824 Court Street

P.O. Box 994390

Redding, CA 96099-4390

Tel: 530.243.8008

Fax: 530.243.1648

E-Mail: [tellusaboutyourcase@ca-lawyer.com](mailto:tellusaboutyourcase@ca-lawyer.com)

**SERVICE LIST**

*Francisco Gudino Cardenas, et al. v. Ghost Gunner Inc., et al.*  
Case No. JCCP 5167

Gerald B. Singleton  
**SINGLETON LAW FIRM**  
450 a Street, 5<sup>th</sup> Floor  
San Diego, CA 92101  
Tel: 619.586.5820  
Fax: 619.255.1515  
E-Mail: [gerald@SLFfirm.com](mailto:gerald@SLFfirm.com)

*Attorneys for Plaintiff*  
**FRANCISCO GUDINO CARDENAS**

**VIA-FACSIMILE**

Ben Rosenfeld  
**ATTORNEY AT LAW**  
115 ½ Bartlett Street  
San Francisco, CA 94110  
Tel: 415.285.8091  
Fax: 415.285.8092

C.D. Michel  
Sean A. Brady  
**MICHEL & ASSOCIATES, P.C.**  
180 E. Ocen Blvd., Suite 200  
Long Beach, CA 90802  
Tel: 562.216.4444  
Fax: 562.216.4445  
E-Mail: [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)

*Attorney for Defendants*  
**BLACKHAWK MANUFACTURING  
GROUP, INC.; RYAN BEEZLEY AND BOB  
BEEZLEY; GHOST FIREARMS, LLC; MFY  
TECHNICAL SOLUTIONS, LLC; AND  
THUNDER GUNS, LLC**