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

12 GHOST GUNNER FIREARMS CASES
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14 Included actions:
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16 30-2019-01111797-CU-PO-CJC *Cardenas v. Ghost*
Gunner, Inc. dba GhostGunner.net, et al.
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18 CIV-DS-1935422 *McFadyen, et al. v. Ghost Gunner,*
Inc., dba GhostGunner.net, et al.
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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

**JOINT STIPULATION AND
[PROPOSED] ORDER
REGARDING PROCEDURES
AND SCHEDULES FOR
DEMURRERS AND DISCOVERY**

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

1	Defendants' Unique Demurrers		Demurrers)
2	Defendants' Joint Reply to Joint Demurrer	10 pages	April 4, 2022 (21 days after Plaintiffs' Joint Opposition to Defendants' Joint Demurrer)
3	Defendants' Joint Replies to Unique Demurrers	7 pages each	April 4, 2022 (21 days after Plaintiffs' Joint Opposition to Defendants' Unique Demurrer)
4	Hearing	N/A	May 6, 2022 at 9:00 a.m. (as ordered by the Court in its December 10, 2021 Minute Order)

9 **DISCOVERY LIMITS AND SCHEDULE**

10 3. ***Special Interrogatories.*** The Parties are limited to the following processes for
11 Special Interrogatories:

- 12 a. Joint Special Interrogatories. Plaintiffs/Defendants are permitted to jointly
13 serve up to 30 Joint Special Interrogatories which shall be responded to by
14 each and every Defendant/Plaintiff.
- 15 b. Individual Special Interrogatories. Each Plaintiff/Defendant is permitted to
16 serve up to 5 Individual Special Interrogatories on any other Party.

17 4. ***Form Interrogatories.*** Plaintiffs/Defendants are permitted to jointly serve a set of
18 Joint Form Interrogatories which shall be responded to by each and every Defendant/Plaintiff.

19 5. ***Requests for Production/Inspection.*** The Parties are limited to the following
20 processes for Requests for Production/Inspection ("RFPs").

- 21 a. Joint RFPs. Plaintiffs/Defendants are permitted to jointly serve up to 30
22 Joint RFPs which shall be responded to by each and every
23 Defendant/Plaintiff.
- 24 b. Individual RFPs. Each Plaintiff/Defendant is permitted to serve up to 7
25 Individual RFPs on any other Party.

26 6. Each party shall have the right to petition the Court for additional written and/or
27 document discovery, which shall be granted upon a showing of good cause by the moving party.

[PROPOSED] ORDER

Having considered the Plaintiffs’ and Defendants’ Joint Stipulation Regarding Procedures and Schedules for Demurrers and Discovery, and good cause appearing therein, it is hereby ORDERED that:

PROCESSES FOR DEFENDANTS’ DEMURRERS: GLOBAL AND UNIQUE

1. The Defendants are permitted to submit two types of demurrers: a) a single, coordinated joint demurrer (“Global Demurrer”) addressing issues that apply to all Defendants; and b) a maximum of three (3) individual demurrers (“Unique Demurrers”) addressing discrete issues unique to some, but not all Defendants.

2. The Parties shall adhere to the following processes and schedule for demurrers:

Pleading	Page Limits	Deadline
Defendants’ Global Demurrer	30 pages	January 24, 2022 (45 days after the December 10, 2021 Status Conference)
Defendants’ Unique Demurrers* *Defendants are limited to filing a maximum of three (3) Unique Demurrers	15 pages each	January 24, 2022 (45 days after the December 10, 2021 Status Conference)
Plaintiffs’ Joint Opposition to Defendants’ Joint Demurrer	30 pages	March 10, 2022 (45 days after filing of Defendants’ Joint Demurrer)
Plaintiffs’ Joint Opposition(s) to Defendants’ Unique Demurrers	15 pages each	March 10, 2022 (45 days after filing of Defendants’ Unique Demurrers)
Defendants’ Joint Reply to Joint Demurrer	10 pages	April 4, 2022 (21 days after Plaintiffs’ Joint Opposition to Defendants’ Joint Demurrer)
Defendants’ Joint Replies to Unique Demurrers	7 pages each	April 4, 2022 (21 days after Plaintiffs’ Joint Opposition to Defendants’ Unique Demurrer)
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