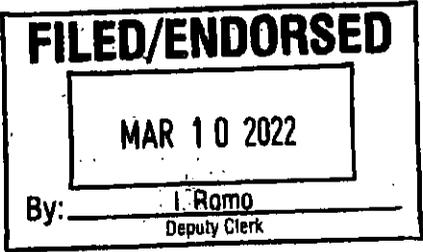


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

C.D. Michel – SBN 144258  
Sean A. Brady – SBN 262007  
MICHEL & ASSOCIATES, P.C.  
180 E. Ocean Blvd., Suite 200  
Long Beach, CA 90802  
Telephone: (562) 216-4444  
Facsimile: (562) 216-4445  
Email: sbrady@michellawyers.com



Attorneys for Defendants Ryan Beezley and Bob Beezley,  
Thunder Guns, LLC, Ghost Firearms, LLC, Matrix Arms,  
Blackhawk Manufacturing Group, Inc., James Madison  
Tactical, Inc., JSD Supply, and MFY Technical Solutions, 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 Jill H. Talley; Dept. 25]*

**NOTICE OF APPEARANCE OF  
COUNSEL FOR MATRIX ARMS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

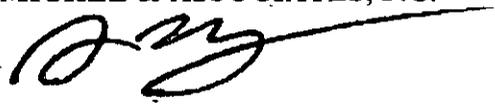
TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Defendant Matrix Arms hereby enters its notice of appearance by and through its counsel, Sean A. Brady, in the above-captioned action.

The filing of this Notice of Appearance shall not constitute a waiver of any substantive or procedural challenge to the Complaint.

Dated: March 9, 2022

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



---

Sean A. Brady  
Attorneys for Defendants Ryan Beezley and Bob Beezley, Thunder Guns, LLC, Ghost Firearms, LLC, Matrix Arms, Blackhawk Manufacturing Group, Inc., James Madison Tactical, Inc., JSD Supply, and MFY Technical Solutions, LLC

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 March 9, 2022, I served the foregoing document(s) described as:

8 **NOTICE OF APPEARANCE OF COUNSEL FOR MATRIX ARMS**

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 Please see Attached Service List.

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

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

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

24 Executed on March 9, 2022, at Long Beach, California.

25   
26 Laura Palmerin

1 **SERVICE LIST**

2 Robert J. Nelson *Attorneys for Plaintiffs*

3 [rnelson@lchb.com](mailto:rnelson@lchb.com)

4 Caitlin M. Nelson

5 [cnelson@lchb.com](mailto:cnelson@lchb.com)

6 Lieff Cabraser Heimann & Bernstein, LLP

7 275 Battery Street, 29th Floor

8 San Francisco, CA 94111-3339

9 Tel.: (415) 956-1000

10 Ryan Erdreich *Attorneys for James Tromblee*

11 [rerdreich@pisciotti.com](mailto:rerdreich@pisciotti.com)

12 Danny C. Lallis

13 [dlallis@pisciotti.com](mailto:dlallis@pisciotti.com)

14 Pisciotti Lallis Erdreich

15 30 Columbia Turnpike, Suite 205

16 Florham Park, NJ 07932

17 David A. Melton

18 [dmelton@porterscott.com](mailto:dmelton@porterscott.com)

19 Molly A. Flores

20 [mflores@porterscott.com](mailto:mflores@porterscott.com)

21 MaryJo Smart

22 [msmart@porterscott.com](mailto:msmart@porterscott.com)

23 Porter Scott

24 350 University Ave, Suite 200

25 Sacramento, CA 95825

26 Germain D. Labat *Attorneys for Defendant Polymer80, Inc.*

27 [Germain.Labat@gmlaw.com](mailto:Germain.Labat@gmlaw.com)

28 Greenspoon Marder LLP

590 Madison Avenue, Suite 1800

New York, NY 10022

James J. McGuire

[james.mcguire@gmlaw.com](mailto:james.mcguire@gmlaw.com)

Michael Marron

[michael.marron@gmlaw.com](mailto:michael.marron@gmlaw.com)

Michael Patrick

[michael.patrick@gmlaw.com](mailto:michael.patrick@gmlaw.com)

GREENSPOON MARDER LLP

590 Madison Avenue, Suite 1800

New York, New York 10022

Facsimile: (212) 524-5050

26 Christopher Renzulli *Attorneys for Defendant Juggernaut Tactical,*

27 [crenzulli@renzullilaw.com](mailto:crenzulli@renzullilaw.com) *Inc.*

28 Howard B. Schilsky

[hschilsky@renzullilaw.com](mailto:hschilsky@renzullilaw.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Renzulli Law Firm, LLP  
One North Broadway, Suite 1005  
White Plains, NY 10601  
Fax: (914) 285-1213

Richard Linkert  
[rlinkert@mathenysears.com](mailto:rlinkert@mathenysears.com)  
Madison Simmons  
[msimmons@mathenysears.com](mailto:msimmons@mathenysears.com)  
Nicole Gilzean  
[ngilzean@mathenysears.com](mailto:ngilzean@mathenysears.com)  
Matheny Sears Linkert & Jaime LLP  
3638 American River Drive  
Sacramento, CA 95864-4711

*Attorneys for Defendant Juggernaut Tactical, Inc.*

Grant D. Waterkotte  
[gwaterkotte@pettitkohn.com](mailto:gwaterkotte@pettitkohn.com)  
Tina M. Robinson  
[trobenson@pettitkohn.com](mailto:trobenson@pettitkohn.com)  
Petit Kohn Ingrassia Lutz & Dolin PC  
5901 W. Century Blvd., Suite 1100  
Los Angeles, CA 90045

*Attorneys for Defense Distributed (erroneously sued as "Ghost Gummer, Inc.")*