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7 Attorneys for Plaintiffs

Francisco Gudino Cardenas and Troy McFadyen, et al.

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 FOR THE 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 *McFadyen, 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

**JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: March 18, 2022
Time: 1:30pm
Dept.: CX 104
Judge: Hon. William D. Claster

1 **JOINT CASE MANAGEMENT CONFERENCE STATEMENT**

2 **I. UPDATE OF CASE STATUS SINCE LAST CMC**

3 The Parties jointly submit this Case Management Conference Statement to update the
4 Court on events since the last conference. Plaintiffs will have filed their opposition briefs to
5 Defendants' three pending demurrers by March 10, Defendants' reply briefs are due April 4 and
6 the hearing is scheduled for May 6 at 9 a.m. PST.

7 **II. DISCOVERY AND PROPOSED PROCESS FOR WEAPONS INSPECTION AT**
8 **TEHAMA COUNTY SHERIFF'S DEPARTMENT**

9 The Parties are preparing to serve written discovery. The Parties also have communicated
10 about a joint process to inspect the weapons used in the Tehama County shooting that are in the
11 custody of the Tehama County Sheriff's Department. Tehama County's Counsel has offered to
12 provide the parties with some potential dates for inspection by all parties of the respective
13 firearms in the County's custody without the need for a subpoena at this time. The parties will
14 work together with County Counsel to determine a schedule and protocol for that informal
15 inspection.

16 **III. CONCLUSION**

17 The Parties request that the Court set a further scheduling conference immediately after
18 the demurrer hearing on May 6, 2022 to assess the Parties' progress on these issues.

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21 *[SIGNATURES ON NEXT PAGE]*
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1 Respectfully submitted.

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3 Dated: March 11, 2021

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

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5
6 By: /s/ Amy K. Van Zant
AMY K. VAN ZANT
Attorneys for Plaintiffs
Francisco Gudino Cardenas and
Troy McFayden, et al. and Liaison Counsel
for Plaintiffs

9 MICHEL & ASSOCIATES, P.C.

10
11 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

1 **PROOF OF SERVICE**

2 I am employed in the County of Orange, State of California. I am over the age of eighteen
3 years and not a party to this action. My business address is Orrick, Herrington & Sutcliffe LLP,
4 2050 Main Street, Suite 1100, Irvine, California 92614.

5 On March 11, 2022, I served the foregoing document described as:

6 • **JOINT CASE MANAGEMENT CONFERENCE STATEMENT**

7 upon the interested parties in this action listed below in the manner described as follows:

8

	(VIA EMAIL) I caused to be transmitted via electronic mail the document(s) listed above to the electronic address(es) set forth below.
X	(VIA Electronic Means) I caused to be transmitted via electronic means the document(s) listed above to the electronic address(es) set forth below.


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11
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Liaison Counsel and Attorneys for
Defendants
GHOST FIREARMS, LLC, THUNDER
GUNS, LLC, RYAN BEEZLEY and BOB
BEEZLEY, and MFY TECHNICAL
SOLUTIONS, LLC

16
17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct.

19 Executed on March 11, 2022 at Irvine, California.

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21 
Donna M. Bourgeois