JCG	lectronically Filed by Superior Court of California, County of 0 P 5167 - ROA # 299 - DAVID H. YAMASAKI, Clerk of the Co	Orange, 01/25/2022 02:14:00 PM. urt By Gus Hernandez, Deputy Clerk.
1 2 3 4 5 6 7 8 9	AMY K. VAN ZANT (STATE BAR NO. 197426) avanzant@orrick.com RIC T. FUKUSHIMA (STATE BAR NO. 272747) rfukushima@orrick.com SHAYAN SAID (STATE BAR NO. 331978) ssaid@orrick.com ANNA Z. SABER (STATE BAR NO. 324628) annasaber@orrick.com ORRICK, HERRINGTON & SUTCLIFFE LLP 1000 Marsh Road Menlo Park, CA 94025-1015 Telephone: +1 650 614 7400 Facsimile: +1 650 614 7401 Attorneys for Plaintiffs Francisco Gudino Cardenas and Troy McFadyen, et al. SUPERIOR COURT OF THE STA	
10	COUNTY OF OR	ANGE
11 12 13	GHOST GUNNER FIREARMS CASES	JCCP No. 5167
14	Included actions:	Superior Court of California County of Orange Case No. 30-2019-01111797-CU-PO-
15 16 17	30-2019-01111797-CU-PO-CJC Cardenas v. Ghost Gunner, Inc. dba GhostGunner.net, et al. CIV-DS-1935422 McFadyen, et al. v. Ghost Gunner,	CJC Superior Court of California County of San Bernardino Case No. CIV-DS-1935422
18	Inc., dba GhostGunner.net, et al.	JOINT STIPULATION AND
19 20		[PROPOSED] ORDER REGARDING PROCEDURES AND SCHEDULES FOR
21		DEMURRERS AND DISCOVERY
22		Dept.: CX 104 Judge: Hon. William D. Claster
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27 28		
	JOINT STIPULATION AND [PROPOSED] ORDER REGARD DEMURRERS AND DIS	

The Parties respectfully submit this Joint Stipulation requesting formal approval of the					
3 stipulations approved by the Court in the December 10, 2021 Minute Order rega					
proce	dures and deadlines for demurr	er briefing and 2) the	Parties' discovery limits and schedule		
WHEREAS, following the December 10, 2021 Case Management Conference, the Court					
issued a Minute Order, dated December 10, 2021, approving the Parties' demurrer and discovery					
agreements set forth in the December 6, 2021 Joint Case Management Conference Statement and					
eque	sted that the Parties submit a fo	ormal stipulation docu	umenting the same for the Court's		
ppro	val;				
	NOW, THEREFORE, the Pa	rties, through their re	spective counsel of record, formally		
tipul	ate to the following:				
PROCESSES FOR DEFENDANTS' DEMURRERS: GLOBAL AND UNIQUE					
	PROCESSES FOR DEFEN	<u>IDANIS' DEMURF</u>	LING, ULUDAL AND UNIQUE		
			ingle, coordinated joint demurrer		
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	1. Defendants are permi bal Demurrer") addressing issu	tted to submit: a) a s les that apply to all D	ingle, coordinated joint demurrer efendants; and b) a maximum of three		
3) in	1. Defendants are permi bal Demurrer") addressing issu dividual demurrers ("Unique D	tted to submit: a) a s les that apply to all D	ingle, coordinated joint demurrer		
3) in	1. Defendants are permi bal Demurrer") addressing issu dividual demurrers ("Unique D r more defendants.	tted to submit: a) a s les that apply to all D pemurrers") addressin	ingle, coordinated joint demurrer efendants; and b) a maximum of three		
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1	Defendants' Unique Demurrers	Demurrers)				
2 3	Defendants' Joint Reply to 10 p Joint Demurrer	Dages April 4, 2022 (21 days after Plaintiffs' Joint Opposition to Defendants' Joint Demurrer)				
4 5	Unique Demurrers	April 4, 2022 (21 days after Plaintiffs' Joint Opposition to Defendants' Unique Demurrer)				
6 7 8	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 SC					
10	3. Special Interrogatories. T					
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 Indivi	dual Special Interrogatories on any other Party.				
17	l s	intiffs/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		<i>uspection</i> . The Parties are limited to the following				
20	processes for Requests for Production/Insp	pection ("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	Defendant/Plaintiff.				
24	b. <u>Individual RFPs</u> . E	ach Plaintiff/Defendant is permitted to serve up to 7				
25	Individual RFPs on	any other Party.				
26	6. Each party shall have the ri	ght to petition the Court for additional written and/or				
27	document discovery, which shall be granted	ed upon a showing of good cause by the moving party.				
28		- 2 -				
		DER REGARDING PROCEDURES AND SCHEDULES FOR ERS AND DISCOVERY				

Peadline Fact Discovery 8/31/2022 Deadline for Serving Written and Document Discovery 9/16/2022 Close of Fact Discovery 12/2/2022 Deadline to File Discovery Motions on Fact Depositions 12/16/202 Deadline to File Discovery Motions on Fact Depositions 12/16/202 Dated: January 24, 2022 ORRICK HERRINGTON & SUTCLIFFE LI AMY K. VAN ZANT RICT. FUKUSHIMA SHAYAN SAID ANNA Z. SABER By: /s/ Amy K. Van Zant AMY K. VAN ZANT Atomeys for Plaintiffs Francisco Gudino Cardenas and Troy McFadyen, et al. Dated: January 24, 2022 MICHEL & ASSOCIATES, P.C. C.D. MICHEL SEAN A. BRADY By: /s/ Sean A. Brady SEAN A. BRADY By: /s/ Sean A. Brady SEAN A. BRADY 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 Couns for Defendants	7. The Parties shall adh	here to the following fact discovery schedule	for written and
Peadline Fact Discovery 8/31/202 Deadline for Serving Written and Document Discovery 9/16/202 Deadline to File Discovery 12/2/202 Close of Fact Discovery Motions on Fact Depositions 12/16/202 Deadline to File Discovery Motions on Fact Depositions 12/16/202 Dated: January 24, 2022 ORRICK HERRINGTON & SUTCLIFFE LL AMY K, VAN ZANT RIC T, FUKUSHIMA SHAYAN SAID ANNA Z. SABER By: _/s/ Amy K. Van Zant AMY K, VAN ZANT Atomeys for Plaintiffs Francisco Gudino Cardenas and Troy McFadyen, et al. Dated: January 24, 2022 MICHEL & ASSOCIATES, P.C. C.D. MICHEL SEAN A. BRADY By: /s/ Sean A. BRADY By: /s/ Sean A. BRADY By: /s/ Sean A. BRADY Manufacturing Group, Inc.: Ryan Beezley and Bob Beezley; Ghost Firearms, LLC; and Thunder Guns, Sean A. Brady	document discovery:		
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Deadline to File Discovery Motions on Written and Document Discovery 9/16/2022 Close of Fact Discovery 12/2/2022 Deadline to File Discovery Motions on Fact Depositions 12/16/202 Dated: January 24, 2022 ORRICK HERRINGTON & SUTCLIFFE LI AMY K. VAN ZANT RIC T. FUKUSHIMA SHAYAN SAID ANNA Z. SABER By: /s/ Amy K. VAN ZANT Attorneys for Plaintiffs Francisco Gudino Cardenas and Troy McFadyen, et al. Dated: January 24, 2022 MICHEL & ASSOCIATES, P.C. C. D. MICHEL SEAN A. BRADY By: /s/ Sean A. BRADY Murdacturing Bob Beezley; Ghost Firearms, LLC; MFY Technical Solutions, LLC; and Thunder Guns, LLC and Liaison Couns for Defendants	Fact Discovery		
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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 Couns for Defendants	Dated: January 24, 2022	C.D. MICHEL	
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 Couns for Defendants		By: /s/ Sean A. Brady	
Manufacturing Group, Inc.; Ryan Beezley and Bob Beezley; Ghost Firearms, LLC; MFY Technical Solutions, LLC; and Thunder Guns, LLC and Liaison Counse for Defendants		SEAN A. BRA	
Ryan Beezley and Bob Beezley; Ghost Firearms, LLC; MFY Technical Solutions, LLC; and Thunder Guns, LLC and Liaison Couns- for Defendants			
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JOINT STIPULATION AND [PROPOSED] ORDER REGARDING PROCEDURES AND SCHEDULES FO	JOINT STIPULATION AND [PROPOS		CHEDULES FOR

1	1	PROPOSED] ORDER				
2	Having considered the Plaintiffs' and Defendants' Joint Stipulation Regarding					
3	Procedures and Schedules for Demurrers and Discovery, and good cause appearing therein, it is					
4	hereby ORDERED that:					
5	PROCESSES FOR DEFENDANTS' DEMURRERS: GLOBAL AND UNIQUE					
6	1. The Defendants are permitted to submit two types of demurrers: a) a single,					
7	coordinated joint demurrer ("Global Demurrer") addressing issues that apply to all Defendants;					
8	and b) a maximum of three (3) indivi	dual demurrers ("Unique	e Demurrers") addressing discrete			
9	issues unique to some, but not all De	fendants.				
10	2. The Parties shall adhe	re to the following proce	sses and schedule for demurrers:			
11	Pleading	Page Limits	Deadline			
12	Defendants' Global	30 pages	January 24, 2022 (45 days after			
13	Demurrer		the December 10, 2021 Status Conference)			
14	Defendants' Unique Demurrers*	15 pages each	January 24, 2022 (45 days after the December 10, 2021 Status			
15	*Defendants are limited to		Conference)			
16	filing a maximum of three (3) Unique Demurrers					
17	Plaintiffs' Joint Opposition	30 pages	March 10, 2022 (45 days after			
18	to Defendants' Joint Demurrer		filing of Defendants' Joint Demurrer)			
19	Plaintiffs' Joint	15 pages each	March 10, 2022 (45 days after			
20	Opposition(s) to Defendants' Unique		filing of Defendants' Unique Demurrers)			
21	Demurrers	10 magaz	Amil 4, 2022 (21, dans, effer			
22	Defendants' Joint Reply to Joint Demurrer	10 pages	April 4, 2022 (21 days after Plaintiffs' Joint Opposition to			
23	Defendents' Joint Denlice to	7 pages each	Defendants' Joint Demurrer)			
24 25	Defendants' Joint Replies to Unique Demurrers	7 pages each	April 4, 2022 (21 days after Plaintiffs' Joint Opposition to			
26	Hearing	N/A	Defendants' Unique Demurrer) May 6, 2022 at 9:00 a.m. (as			
20			ordered by the Court in its			
28			December 10, 2021 Minute Order)			
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	JOINT STIPULATION AND [PROPOSED] ORDER REGARDING PROCEDURES AND SCHEDULES FOR DEMURRERS AND DISCOVERY					

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f Joint Form				
5. Requests for Production/Inspection.				
a. Joint RFPs. Plaintiffs/Defendants may jointly serve up to 30 Joint RFPs				
which shall be responded to by each and every Defendant/Plaintiff.				
ndividual				
RFPs on any other Party.6. Each party shall have the right to petition the Court for additional written and/or				
document discovery, which shall be granted upon a showing of good cause by the moving party.				
7. The Parties shall adhere to the following fact discovery schedule for written and				
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