

FILED  
Superior Court Of California  
Sacramento  
03/11/2022  
for  
By \_\_\_\_\_, Deputy  
Case Number:  
34-2021-00302934

1 Craig A. Livingston – SBN 148551  
2 Crystal L. Van Der Putten – SBN 227262  
3 LIVINGSTON LAW FIRM  
4 A Professional Corporation  
5 1600 South Main Street, Suite 280  
6 Walnut Creek, CA 94596  
7 Tel: (925) 952-9880  
8 Fax: (925) 952-9881  
9 Email: clivingston@livingstonlawyers.com  
10 cvanderputten@livingstonlawyers.com

11 Attorneys for Defendant  
12 TACTICAL GEAR HEADS LLC

13 SUPERIOR COURT OF CALIFORNIA

14 COUNTY OF SACRAMENTO - UNLIMITED CIVIL

15 KELLEY and DENIS O'SULLIVAN, in  
16 their Individual Capacity and KELLY  
17 O'SULLIVAN as Administrator of the  
18 Estate of TARA O'SULLIVAN, Deceased,

19 Plaintiff,

20 v.

21 GHOST GUNNER INC., d/b/a  
22 GHOSTGUNNER.NET;

23 BLACKHAWK MANUFACTURING  
24 GROUP INC., d/b/a  
25 80PERCENTARMS.COM;

26 RYAN BEEZLEY and BOB BEEZLEY,  
27 d/b/a RBTACTICALTOOLING.COM;

28 GHOST AMERICA LLC, d/b/a  
GHOSTGUNS.COM;

GHOST FIREARMS LLC, d/b/a GRID  
DEFENSE and GHOSTRIFLES.COM;

JUGGERNAUT TACTICAL INC., d/b/a  
JTACTICAL.COM;

MFY TECHNICAL SOLUTIONS LLC,  
d/b/a 5DTACTICAL.COM;

) Case No. 34-2021-00302934

) [ASSIGNED TO HON. RICHARD K.  
) SUEYOSHI IN DEPT. 40]

) NOTICE OF SPECIAL APPEARANCE  
) BY DEFENDANT TACTICAL GEAR  
) HEADS LLC

) Complaint Filed: 06/17/21

) Trial Date: None

BY FAX

1 TACTICAL GEAR HEADS LLC, d/b/a 80-  
2 LOWER.COM; AR-  
3 15LOWERRECEIVERS.COM; and  
4 80LOWERJIG.COM;

5 JAMES TROMBLEE, JR., d/b/a  
6 USPATRIOTARMORY.COM;

7 THUNDER GUNS LLC, d/b/a  
8 THUNDERTACTICAL.COM;

9 POLYMER 80, INC., d/b/a  
10 POLYMER80.COM and P80 TACTICAL;

11 JSD SUPPLY, d/b/a JSDSUPPLY.COM and  
12 80PERCENTGUYS.COM;

13 JAMES MADISON TACTICAL LLC, d/b/a  
14 JAMESMADISONTACTICAL.COM;

15 WM. C. ANDERSON, INC., d/b/a  
16 ANDERSONMANUFACTURING.COM;

17 MATRIX ARMS, d/b/a  
18 MATRIXARMS.COM;

19 M-16PARTS SUPPLY LLC, d/b/a M-  
20 16PARTS.COM; and

21 DOES 1-50,

22 **Defendants.**

23 **TO THE COURT AND TO ALL COUNSEL OF RECORD:**

24 **PLEASE TAKE NOTICE** that defendant TACTICAL GEAR HEADS LLC hereby  
25 specially appears by and through its counsel of record, Craig A. Livingston and Crystal E. Van  
26 Der Putten, in the above-captioned action.  
27  
28

1 Please direct all pleadings, notices, correspondence or any other document to  
2 TACTICAL GEAR HEADS LLC's counsel of record as follows:

3 Craig A. Livingston  
4 Crystal L. Van Der Putten  
5 Livingston Law Firm, P.C.  
6 1600 South Main Street, Suite 280  
7 Walnut Creek, CA 94596-8818  
8 Phone: (925) 952-9880  
9 Facsimile: (925) 952-9881  
10 Email: [clivingston@livingstonlawyers.com](mailto:clivingston@livingstonlawyers.com)  
11 Email: [cvanderputten@livingstonlawyers.com](mailto:cvanderputten@livingstonlawyers.com)

12 Dated: March 10, 2022.

LIVINGSTON LAW FIRM



13 By \_\_\_\_\_

14 Craig A. Livingston  
15 Crystal L. Van Der Putten  
16 Attorneys for Defendant  
17 TACTICAL GEAR HEADS LLC  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I, the undersigned, hereby declare that I am over the age of eighteen years and not a party to the within action. I am readily familiar with this firm's business practice for collection and processing of documents for mailing with the U.S. Postal Service. My business address is 1600 South Main Street, Suite 280, Walnut Creek, California 94596. On the date set forth below, I served the following document(s):

**NOTICE OF SPECIAL APPEARANCE BY DEFENDANT TACTICAL GEAR HEADS LLC**

upon the following at the address(es) stated below:

Robert J. Nelson, Esq.  
Caitlin M. Nelson, Esq.  
LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP  
275 Battery Street, 29<sup>th</sup> Floor  
San Francisco, CA 94111-3339  
Tel: (415) 956-1000  
Fax: (415) 956-1008  
Email: [rmelson@lchb.com](mailto:rmelson@lchb.com)  
[cnelson@lchb.com](mailto:cnelson@lchb.com)

Jonathan Lowy, Esq. (*pro hac vice pending*)  
Christa Nicols, Esq. (*pro hac vice pending*)  
BRADY: UNITED AGAINST GUN  
VIOLENCE  
840 First Street, NE Suite 400  
Washington, DC 20002  
Tel: (202) 370-8100  
Fax: (202) 898-8100  
Email: [jlowy@bradyunited.org](mailto:jlowy@bradyunited.org)  
[cnicols@bradyunited.org](mailto:cnicols@bradyunited.org)

*Attorneys for Plaintiffs Kelly and Denis  
O'Sullivan*

(VIA EMAIL ONLY)

David A. Melton, Esq.  
Molly A. Flores, Esq.  
MaryJo Smart, Esq.  
POTER SCOTT LAW FIRM  
350 University Ave, Suite 200  
Sacramento, CA 95825  
Tel: (916) 929-1481  
Fax: (916) 927-3706  
Email: [dmelton@porterscott.com](mailto:dmelton@porterscott.com)  
[mflores@porterscott.com](mailto:mflores@porterscott.com)  
[msmart@porterscott.com](mailto:msmart@porterscott.com)

Anthony M. Piscioti, Esq.  
Danny Lallis, Esq.  
Ryan Erdreich, Esq.  
PISCIOTTI LALLIS ERDREICH, P.C.  
30 Columbia Turnpike, Suite 205  
Florham Park, NJ 07932  
Tel: (973) 245-8100  
Fax: (973) 245-8101  
Email: [apisciotti@pisciotti.com](mailto:apisciotti@pisciotti.com)  
[dlallis@pisciotti.com](mailto:dlallis@pisciotti.com)  
[rerdreich@pisciotti.com](mailto:rerdreich@pisciotti.com)

*Attorneys for Defendants JAMES  
TROMBLEE, JR., d/b/a  
USPATRIOTARMORY.COM*

(VIA EMAIL ONLY)

1 Sean A. Brady, Esq.  
2 Michel & Associates, P.C. Attorneys at Law  
3 180 East Ocean Boulevard, Suite 200  
4 Long Beach, CA 90802  
5 Tel: (562) 216-4444  
6 Fax: (562) 216-4445  
7 Email: [sbrady@michellawvers.com](mailto:sbrady@michellawvers.com)

8 *Attorneys for Defendants, RYAN BEEZLEY*  
9 *AND BOB BEEZLEY d/b/a*  
10 *RBTACTICIALTOOLING.COM, THUNDER*  
11 *GUNS LLC, d/b/a THUNDERTACTICAL.COM,*  
12 *GHOST FIREARMS LLC, d/b/a GRID DEFENSE*  
13 *and GHOSTRIFLES.COM, and BLACKHAWK*  
14 *MANUFACTURING GROUP INC., d/b/a*  
15 *80PERCENTARMS.COM*

16 (VIA EMAIL ONLY)

17 Howard Schilsky, Esq.  
18 RENZULLI LAW FIRM, LLP  
19 One N. Broadway, Suite 1005  
20 White Plains, NY 10601  
21 Tel: (914) 285-0700  
22 Fax: (914) 285-1213

23 *Attorneys for Defendant, JUGGERNAUT*  
24 *TACTICAL, INC. d/b/a JTACTICAL.COM*

25 (VIA EMAIL ONLY)

26 David H. Pollock, Esq.  
27 JACOBSEN & MCELROY PC  
28 2401 American River Drive, Suite 100  
Sacramento, CA 95825  
Tel: (916) 971-4100 Ext. 231  
Fax: (916) 971-4150  
Email: [dpollock@jacobsenmcelroy.com](mailto:dpollock@jacobsenmcelroy.com)

Grant D. Waterkotte, Esq.  
Tina M. Robinson, Esq.  
Pettit Kohn Ingrassia Lutz & Dolin PC  
5901 W. Century Blvd., Suite 1100  
Los Angeles, CA 90045  
Tel: (310) 649-5772  
Fax: (310) 649-5777  
Email: [gwaterkotte@11ettitkohn.com](mailto:gwaterkotte@11ettitkohn.com)

James McGuire, Esq.  
GREENSPOON MARDER LLP  
590 Madison Avenue, Suite 1800  
New York, New York 10022  
Tel: (212) 501-7673  
Facsimile: (212) 524-5050  
Email: [james.mcguire@gmlaw.com](mailto:james.mcguire@gmlaw.com)

*Attorneys for Defendant*  
*POLYMER80, INC.*

(VIA EMAIL ONLY)

William A. Jenkins, Esq.  
ERICKSEN ARBUTHNOT  
100 Howe Ave., Ste. 110S  
Sacramento, CA 95825  
Tel: (916) 483-5181 ext.223  
Fax: (916) 483-7558  
Email: [wjenkins@ericksenarbuthnot.com](mailto:wjenkins@ericksenarbuthnot.com)

*Attorneys for Defendant WM. C. ANDERSON,*  
*INC., d/b/a*  
*ANDERSONMANUFACTURING.COM*

(VIA EMAIL ONLY)

Germain D. Labat, Esq.  
GREENSPOON MARDER LLP  
1875 Century Park East, Suite 1900  
Los Angeles, CA 90067  
Tel: (323) 880-4539

*Attorneys for Defendant POLYMER80, INC., d/b/a*  
*POLYMER80.COM and P80 TACTICAL*

(VIA EMAIL ONLY)

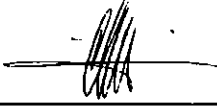
|    |                                             |                                    |
|----|---------------------------------------------|------------------------------------|
| 1  | trobinson@pettitkohn.com                    |                                    |
| 2  | <i>Attorneys for Defendant GHOST GUNNER</i> |                                    |
| 3  | <i>INC., d/b/a GHOSTGUNNER.NET</i>          |                                    |
| 4  | (VIA EMAIL ONLY)                            |                                    |
| 5  | MATRIX ARMS, d/b/a                          | INDUSTRY ARMAMENT INC., d/b/a      |
| 6  | MATRIXARMS.COM                              | AMERICANWEAPONSCOMPONENTS.COM      |
| 7  | 75 Winter Street                            | CT Corp Trust Co                   |
| 8  | Claremont, NH 03743-5054                    | 1209 N Orange Street               |
| 9  | (VIA REGULAR MAIL ONLY)                     | Wilmington, DE 19801-1120          |
| 10 | JAMES MADISON TACTICAL LLC,                 | M-16 PARTS SUPPLY LLC, d/b/a M-    |
| 11 | d/b/a JAMESMADISONTACTICAL.COM              | 16PARTS.COM                        |
| 12 | 2310 Michael Ave                            | c/o Terry J. Weisflog              |
| 13 | Richland, WA 99352-6102                     | 5918 England Avenue                |
| 14 | (VIA REGULAR MAIL ONLY)                     | Orlando, FL 32808                  |
| 15 | MFY TECHNICAL SOLUTIONS LLC,                | TACTICAL GEAR HEADS LLC, d/b/a 80- |
| 16 | d/b/a 5DTACTICAL.COM                        | LOWER.COM; AR-                     |
| 17 | 24 Asylum Street                            | 15LOWERRECEIVERS.COM               |
| 18 | Milford, MA 01757-1266                      | 11374 Falling Water Way            |
| 19 | (VIA REGULAR MAIL ONLY)                     | Fishers, IN 4603 7-4077            |
| 20 | JSD SUPPLY, d/b/a JSDSUPPLY.COM             | (VIA REGULAR MAIL ONLY)            |
| 21 | and 80PERCENTGUYS.COM                       |                                    |
| 22 | 102 Patriot Lane                            |                                    |
| 23 | Butler, PA 16001-0210                       |                                    |
| 24 | (VIA REGULAR MAIL ONLY)                     |                                    |

Service was accomplished as follows:

☒ **BY US MAIL, According to Normal Business Practices.** At my place of business at the above address, I sealed the above document(s) in an envelope addressed to the above, and I placed that sealed envelope for collection and mailing following ordinary business practices, for deposit with the U.S. Postal Service. I am readily familiar with the business practice at my place of business for the collection and processing of correspondence for mailing with the U.S. Postal Service. Correspondence so collected and processed is deposited with the U.S. Postal Service the same day in the ordinary course of business, postage fully prepaid.

1     **X**     **BY ELECTRONIC TRANSMISSION:** Pursuant to Code of Civil Procedure section  
2     1010.6, I caused the documents to be electronically sent to the persons listed above.  
3     Before first serving electronically, I confirmed through prior email communications the  
4     appropriate electronic service address for counsel being served. I did not receive, within  
5     a reasonable time after the transmission, any electronic message or other indication that  
6     the transmission was unsuccessful.

7     I declare under penalty of perjury under the laws of the State of California that the  
8     foregoing is true and correct, and that this declaration was executed on March 10, 2022, at  
9     Walnut Creek, California.

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
  
\_\_\_\_\_  
Christine Williams