

1 AMY K. VAN ZANT (STATE BAR NO. 197426)
avanzant@orrick.com
2 RIC T. FUKUSHIMA (STATE BAR NO. 272747)
rfukushima@orrick.com
3 SHAYAN SAID (STATE BAR NO. 331978)
ssaid@orrick.com
4 KRYSTAL ANDERSON (STATE BAR NO. 320438)
krystal.anderson@orrick.com
5 AMANDA H. SCHWARTZ (*PRO HAC VICE*)
aschwartz@orrick.com
6 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
7 Menlo Park, CA 94025-1015
Telephone: +1 650 614 7400
8 Facsimile: +1 650 614 7401

9 Attorneys for Plaintiffs
Francisco Gudino Cardenas and Troy McFadyen, et al.

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF ORANGE

14 GHOST GUNNER FIREARMS CASES

15 Included actions:

17 30-2019-01111797-CU-PO-CJC *Cardenas v. Ghost*
18 *Gunner, Inc. dba GhostGunner.net, et al.*

19 CIV-DS-1935422 *McFadyen, et al. v. Ghost Gunner,*
20 *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

**SUPPLEMENTAL APPLICATION
OF DANNY BAREFOOT TO
APPEAR AS COUNSEL OF
RECORD *PRO HAC VICE***

Date: April 22, 2022
Time: 9:00 a.m.
Reservation No. 73722931
Dept.: CX 104
Judge: Hon. William D. Claster

1 Pursuant to Rule 9.40 of the California Rules of Court, Danny Barefoot makes this
2 Application to Appear as Counsel of Record *Pro Hac Vice* for Plaintiffs Francisco Gudino
3 Cardenas and Troy McFadyen, et al.

4 **TO ALL PARTIES HEREIN AND THEIR ATTORNEYS OF RECORD:**

5 I, Danny Barefoot, declare as follows:

6 1. I am not a member of the State Bar of California. I have been a member in good
7 standing of and eligible to practice before the following court since the dates indicated:

8 a. District of Columbia Court of Appeals Bar No. 1631649 (January, 2022)

9 2. I am currently a member in good standing in the aforementioned court. I am not
10 currently, nor have I ever been, suspended or disbarred in any court.

11 3. I am not a resident of the State of California, nor am I regularly engaged in
12 substantial business, professional, or other activities in the State of California.

13 4. I have not been admitted *pro hac vice* in any case in this district in the previous
14 two years.

15 5. I am associated in this matter with Amy K. Van Zant (State Bar No. 197426) of
16 the law firm of Orrick, Herrington & Sutcliffe LLP, 1000 Marsh Road, Menlo Park, CA 94025-
17 1015. The firm's telephone number is (650) 614 7400. The facsimile number is (650) 614 7401.

18 6. I have copies of and am familiar with the California Rules of Court, the California
19 Code of Civil Procedure, and the Rules of the Superior Court for the County of Orange.

20 7. My business address is Orrick, Herrington & Sutcliffe LLP, 1152 15th Street,
21 N.W., Washington, D.C. 20005-1706. My residence is in Washington, D.C.

22 8. In accordance with California Rules of Court, Rule 9.40(c), I am having a copy of
23 this Application, the Notice of Hearing on this Application, and the supporting Declaration of
24 Amy K. Van Zant sent to the State Bar of California, along with a check for \$50.00 for the *pro*
25 *hac vice* application fee.

26 ///

27 ///

28 ///

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

Executed this 15th day of April, 2022, at Washington, DC

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

/s/ Danny Barefoot
Danny Barefoot

1 AMY K. VAN ZANT (STATE BAR NO. 197426)
avanzant@orrick.com
2 RIC T. FUKUSHIMA (STATE BAR NO. 272747)
rfukushima@orrick.com
3 SHAYAN SAID (STATE BAR NO. 331978)
ssaid@orrick.com
4 KRYSTAL ANDERSON (STATE BAR NO. 320438)
krystal.anderson@orrick.com
5 AMANDA H. SCHWARTZ (PRO HAC VICE)
aschwartz@orrick.com
6 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
7 Menlo Park, CA 94025-1015
Telephone: +1 650 614 7400
8 Facsimile: +1 650 614 7401

9 Attorneys for Plaintiffs
Francisco Gudino Cardenas and Troy McFadyen, et al.

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF ORANGE

14 GHOST GUNNER FIREARMS CASES

15 Included actions:

17 30-2019-01111797-CU-PO-CJC *Cardenas v. Ghost*
18 *Gunner, Inc. dba GhostGunner.net, et al.*

19 CIV-DS-1935422 *McFadyen, et al. v. Ghost Gunner,*
20 *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

PROOF OF SERVICE

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

1 **PROOF OF SERVICE**

2 I am employed in the County of San Mateo, State of California. I am over the age of
3 eighteen years old and not a party to this action. My business address is Orrick, Herrington &
4 Sutcliffe LLP, 1000 Marsh Rd., Menlo Park, CA 94025.

5 On April 14, 2022, I served the following document(s) entitled:

- 6 • SUPPLEMENTAL APPLICATION OF DANNY BAREFOOT TO APPEAR AS
7 COUNSEL *PRO HAC VICE*
8 • NOTICE OF INTENT TO APPEAR BY TELEPHONE FOR DANNY BAREFOOT
9 • NOTICE OF INTENT TO APPEAR BY TELEPHONE FOR SHAYAN SAID

on all interested parties to this action in the manner described as follows:

10

	(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.
	(VIA U.S. MAIL) By placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Menlo Park, California addressed as set forth below.

11
12
13
14

15 C.D. Michel
16 Sean A. Brady
17 **MICHEL & ASSOCIATES, P.C.**
18 180 E. Ocean Blvd., Suite 200
19 Long Beach, CA 90802
cmichel@michellawyers.com
sbrady@michellawyers.com

20 *Liaison Counsel and Attorneys for Defendants*
21 *Ghost Firearms, LLC, Thunder Guns, LLC,*
22 *Ryan Beezley and Bob Beezley,*
and MFY Technical Solutions, LLC

23
24 I declare under penalty of perjury under the laws of the State of California that the above
25 is true and correct.

26 Executed on April 14, 2022 at Moss Beach, California.

27 /s/ Karin Barnick
28

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