

BY FAX

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Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

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

Plaintiffs,

v.

GHOST GUNNER INC., d/b/a
GHOSTGUNNER.NET; et al.,

Defendants.

Case No. 34-2021-00302934

**NOTICE AND PLAINTIFFS' VERIFIED
APPLICATION FOR PRO HAC VICE
ADMISSION OF PHILIP BANGLE;
NOTICE OF HEARING THEREON; AND
[PROPOSED] ORDER**

TO ALL PARTIES OF RECORD: PLEASE TAKE NOTICE THAT Plaintiffs, by
and through their counsel of records, will and hereby do apply to this Court for an order
permitting Philip Bangle of the law firm of Brady: United Against Gun Violence, to appear in this
action and be admitted to the bar of this Court *pro hac vice*, pursuant to California Rule of Court
9.40.

**DECLARATION OF ROBERT J. NELSON IN SUPPORT OF APPLICATION
FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE**

I, Robert J. Nelson, declare as follows:

1. I am a member in good standing of the State Bar of California and am a partner in
the firm of Lief, Cabraser, Heimann & Bernstein, LLP, attorneys of record herein for Plaintiffs

2383124.2

VERIFIED APPLICATION FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE



1 KELLEY and DENIS O'SULLIVAN, in their Individual Capacity and KELLY O'SULLIVAN as
2 Administrator of the Estate of TARA O'SULLIVAN, Deceased. I have personal knowledge of
3 the matters stated in this Application and could competently testify thereto if called as a witness.

4 2. My firm's co-counsel in this case include Brady: United Against Gun Violence
5 (headquartered in Washington, DC). Submitted along with this Application is the Application of
6 Philip Bangle, who is an attorney with the Brady: United Against Gun Violence, co-counsel who
7 has participated in investigating and prosecuting the case. Admission *pro hac vice* will further
8 Plaintiffs' interests in this matter.

9 3. The accompanying *pro hac vice* Application, as well as this Application, has been
10 served on the State Bar of California along with payment of the \$50.00 application fee for each
11 applicant.

12 I declare under penalty of perjury under the laws of the State of California that the same
13 are true and correct.

14 Executed on May 18, 2022, at San Francisco, California.

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18 Robert J. Nelson (SBN 2999217)
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1 **VERIFIED APPLICATION OF PHILIP BANGLE FOR ADMISSION PRO HAC VICE**

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3 Pursuant to California Rule of Court 9.40, I, Philip Bangle, hereby submit this verified
4 application for admission *pro hac vice* in the above-captioned matter.

5 1. I reside in Washington, DC, and am an attorney with the Brady: United Against
6 Gun Violence, 840 First Street, NE Suite 400, Washington, DC 20002, which is serving as co-
7 counsel in this litigation. I have personal knowledge of the matters stated in this Application and
8 could competently testify to them if called as a witness.

9 2. I have been admitted to practice in the courts of the states of Delaware and
10 Tennessee, attorney number is 4169 (Delaware) and 31636 (Tennessee).

11 3. I am a licensee in good standing in each of the courts mentioned above and am not
12 currently suspended or disbarred in any court.

13 4. I am familiar with the complex issues involved in this litigation. I have spent
14 several months investigating this case with my co-counsel, acquiring knowledge of the legal and
15 factual issues and pertinent evidence. I have developed this expertise in order to be able to
16 represent Plaintiffs in this matter.

17 5. That in the previous two years I have applied for admission pro hac vice in the
18 State of California in three other cases, Yisroel Goldstein, et al. v. John T. Earnest, et al, Case No.
19 37-2020-00016638-CU-PO-CTL; Cardenas and McFayden et al. v. Ghost Gunner, Inc., et al.,
20 Case No. JCCP 5167; and Towner et al. v. Gilroy Garlic Festival Association, Inc., et al., Case
21 No. 19CV358256. That I am not regularly engaged in substantial business, professional, or other
22 activities in California.

23 6. I request permission of the Court to appear as counsel *pro hac vice* on behalf of
24 Plaintiffs, in association with their attorney of record, Robert J. Nelson (SBN 2999217), of Lieff
25 Cabraser Heimann & Bernstein, LLP, 275 Battery St., 29th Floor, San Francisco, CA 94111, (415)
26 956-1000.

27 7. I agree to abide by all local and state laws, rules, and regulations for the practice of
28 law in California and the County of Sacramento.

1 8. I am not a resident of California, am not regularly employed in California, and am
2 not regularly engaged in substantial business, professional, or other activities in California.

3 Pursuant to California Code of Civil Procedure Section 2015.5, I certify (or declare) under
4 penalty of perjury under the laws of the State of California that the foregoing is true and correct:

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6 Dated this 17th day of May, 2022
7 in Washington, D.C.

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Philip H. Bangle

VERIFICATION

I, Philip Bangle, under oath, declare as follows:

1. I have been retained by Plaintiffs to appear in this action as an attorney on their behalf.

2. The matters stated in the foregoing Application to Appear as Counsel *Pro Hac Vice* are true of my own knowledge and belief.

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

Dated this 17th day of May, 2022


Philip H. Bangle

Supreme Court of Tennessee
Certificate of Good Standing

*I, James M. Hivner, Clerk of the Supreme Court of the State of Tennessee,
do hereby certify that*

Philip Henry Bangle

*is a licensed and practicing attorney of the Courts of this State, having been
admitted to practice on April 19, 2013, and is presently in good standing. The
Supreme Court is the Court of last resort in Tennessee.*

*In testimony whereof, I have set my hand and affixed the seal of the Court on
this the 7th day of April, 2022.*

James M. Hivner
Clerk of the Supreme Court of Tennessee

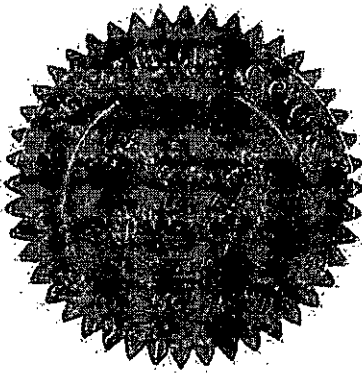
By:


Adam F. Bennett, D.C.

SUPREME COURT OF THE STATE OF DELAWARE

CERTIFICATE OF GOOD STANDING

The Clerk of the Supreme Court of the State of Delaware, the highest Court in the State, certifies that **Philip H. Bangle** was admitted to practice as an attorney in the Courts of this State on **March 12, 2002** and is an **active** member of the Bar of the Supreme Court of the State of Delaware in good standing.



IN TESTIMONY WHEREOF,

I have hereunto set my hand and
affixed the seal of said Court at Dover
this 7th day of April, 2022.

A handwritten signature in black ink, appearing to read "Lisa A. Dolph", is written over a horizontal line.

Lisa A. Dolph
Clerk of the Supreme Court

1
2 SUPERIOR COURT OF THE STATE OF CALIFORNIA
3 COUNTY OF SACRAMENTO
4

5 KELLEY and DENIS O'SULLIVAN, in
6 their Individual Capacity and KELLY
7 O'SULLIVAN as Administrator of the Estate
8 of TARA O'SULLIVAN, Deceased,

9 Plaintiffs,

10 v.

11 GHOST GUNNER INC., d/b/a
12 GHOSTGUNNER.NET; et al.,

13 Defendants.

Case No. 34-2021-00302934

**[PROPOSED] ORDER GRANTING
APPLICATION FOR PRO HAC VICE
ADMISSION OF PHILIP BANGLE;**

ACTION FILED: June 17, 2021

14 After considering the foregoing application and good cause appearing therefor, **IT**
15 **IS ORDERED** that the application of Philip Bangle to appear *pro hac vice* is GRANTED.

16 DATED: _____

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18 _____
19 Judge of the Superior Court
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PROOF OF SERVICE BY MAIL

I am over the age of eighteen years and not a party to the within-entitled action. My business address is 275 Battery Street, 29th Floor, San Francisco, CA 94111. I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On May 18, 2022, I placed with this firm at the above address for deposit with the United States Postal Service a true and correct copy of the within document(s):

1. APPLICATION OF PHILIP BANGLE FOR ADMISSION *PRO HAC VICE*; NOTICE OF HEARING THEREON; AND [PROPOSED] ORDER

in a sealed envelope, postage fully paid, addressed as follows:

David A. Melton
Molly A. Flores
MaryJo Smart
Poter Scott Law Firm
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Attorneys for Defendants, JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM

(VIA EMAIL ONLY)

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Attorneys for Defendants, RYAN BEEZLEY AND BOB BEEZLEY d/b/a RBTACTICALTOOLING.COM, THUNDER GUNS LLC, d/b/a THUNDERTACTICAL.COM, GHOST FIREARMS LLC, d/b/a GRID DEFENSE and GHOSTRIFLES.COM, and BLACKHAWK MANUFACTURING GROUP INC., d/b/a 80PERCENTARMS.COM, MATRIX ARMS, d/b/a MATRIXARMS.COM, JAMES MADISON TACTICAL LLC, d/b/a JAMESMADISONTACTICAL.COM, MFY TECHNICAL SOLUTIONS LLC, d/b/a 5DTACTICAL.COM, TACTICAL GEAR HEADS LLC, d/b/a 80-LOWER.COM; AR-15LOWERRECEIVERS.COM, JSD SUPPLY, d/b/a JSDSUPPLY.COM and 80PERCENTGUYS.COM


(VIA EMAIL ONLY)

<p>Howard Schilsky Renzulli Law Firm, LLP One N. Broadway, Suite 1005 White Plains, NY 10601 Email: hschilsky@renzullilaw.com Telephone: 914-285-0700 Facsimile : 914-285-1213</p> <p>Richard Linkert Matheny Sears Linkert & Jaime LLP 3638 American River Drive Sacramento, CA 95864-4711 rlinkert@mathenysears.com</p> <p><i>Attorneys for Defendant, JUGGERNAUT TACTICAL, INC. d/b/a JTACTICAL.COM</i></p> <p>(VIA EMAIL ONLY)</p>	<p>William A. Jenkins, Esq. Ericksen Arbuthnot 100 Howe Ave., Ste. 110S Sacramento, CA 95825 Email: wjenkins@ericksenarbuthnot.com Telephone: (916) 483-5181 ext.223 Facsimile: (916) 483-7558</p> <p><i>Attorneys for Defendant WM. C. ANDERSON, INC., d/b/a ANDERSONMANUFACTURING.COM</i></p> <p>(VIA EMAIL ONLY)</p>
<p>David H. Pollock Jacobsen & McElroy PC 2401 American River Drive, Suite 100 Sacramento, CA 95825 Email: dpollock@jacobsenmcelroy.com Telephone: (916) 971-4100 Ext. 231 Facsimile: (916) 971-4150</p> <p><i>And</i></p> <p>Grant D. Waterkotte Tina M. Robinson Pettit Kohn Ingrassia Lutz & Dolin PC 5901 W. Century Blvd., Suite 1100 Los Angeles, CA 90045 Email: gwaterkotte@pettitkohn.com trobinson@pettitkohn.com Telephone: (310) 649-5772 Facsimile: (310) 649-5777</p> <p><i>Attorneys for Defendant GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET</i></p> <p>(VIA EMAIL ONLY)</p>	<p>Germain D. Labat Greenspoon Marder LLP 1875 Century Park East, Suite 1900 Los Angeles, CA 90067 Email: germain.labat@gmlaw.com Telephone: (323) 880-4539</p> <p>James McGuire GREENSPOON MARDER LLP 590 Madison Avenue, Suite 1800 New York, New York 10022 Telephone: (212)501-7673 Facsimile: (212) 524-5050 Email: james.mcguire@gmlaw.com</p> <p><i>Attorneys for Defendant POLYMER80, INC., d/b/a POLYMER80.COM and P80 TACTICAL</i></p> <p>(VIA EMAIL ONLY)</p>
<p>M-16 PARTS SUPPLY LLC, d/b/a M- 16PARTS.COM c/o Terry J. Weisflog 5918 England Avenue Orlando, FL 32808</p> <p>(VIA REGULAR MAIL ONLY)</p>	<p>INDUSTRY ARMAMENT INC., d/b/a AMERICANWEAPONSCOMPONENTS.COM CT Corp Trust Co 1209 N Orange Street Wilmington, DE 19801-1120</p> <p>(VIA REGULAR MAIL ONLY)</p>

1 State Bar of California
2 Office of Special Admissions and
3 Specialization
4 180 Howard Street
5 San Francisco, CA 94105

6 Following ordinary business practices, the envelope was sealed and placed for collection
7 and mailing on this date, and would, in the ordinary course of business, be deposited with the
8 United States Postal Service on this date.

9 I declare under penalty of perjury under the laws of the State of California that the above
10 is true and correct. Executed on May 18, 2022, at San Francisco, California.

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12 Caitlin Nelson