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6 Blackhawk Manufacturing Group, Inc.;
Ghost Firearms, LLC; MFY Technical
7 Solutions, LLC; and Thunder Guns, LLC

8
9 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF ORANGE**
11 **CIVIL COMPLEX CENTER**

12 Coordination Proceeding Special Title (Rule
3.550)

Case No. JCCP 5167

13 GHOST GUNNER FIREARMS CASES

[Assigned to the Honorable William D. Claster,
Coordination Trial Judge; Dept. CX104]

14 Included actions:

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE DEADLINE TO
RESPOND TO AMENDED COMPLAINT**

15 Cardenas v. Ghost Gunner, Inc., d/b/a
GhostGunner.net, et al., Orange County
16 Superior Court Case No. 30-2019-01111797-
CU-PO-CJC

17 McFadyen v. Ghost Gunner, Inc. d/b/a Ghost
18 Gunner.net, et al., San Bernardino Superior
Court Case No. CIVDS1935422

1 **JOINT STIPULATION**

2 The Parties respectfully submit this Joint Stipulation requesting a continuance on the
3 deadline to respond to Plaintiffs’ Amended Complaint.

4 WHEREAS, following the May 6, 2022 hearing on Defendants’ Demurrers the Court
5 issued an Order sustaining the Demurrers with leave to amend;

6 WHEREAS, the Order directed the Parties to stipulate to a briefing schedule for any
7 challenges to the Amended Complaint;

8 WHEREAS, on June 24, 2022, Plaintiffs filed an Amended Complaint;

9 WHEREAS, the Parties are currently discussing a briefing schedule for Defendants’
10 demurrers to the Amended Complaint;

11 WHEREAS, the Parties stipulate and agree that the deadline for all Defendants to respond
12 to the Amended Complaint be continued to a date mutually agreed upon by the Parties, and
13 approved by the Court.

14 THEREFORE, the Parties respectfully request the court Order that the deadline to respond
15 to Plaintiffs’ Amended Complaint be continued, and that a proposed briefing schedule for
16 demurrers be submitted for the Court’s approval as part of the Joint Case Management Statement
17 currently due on September 1, 2022.

18
19 Dated: July 22, 2022

MICHEL & ASSOCIATES, P.C.

20
21 *s/ Sean A. Brady*
22 _____
23 Sean A. Brady
24 Attorneys for Defendants
25 Blackhawk Manufacturing Group, Inc.;
26 Ghost Firearms, LLC; MFY Technical
27 Solutions, LLC; and Thunder Guns, LLC and
28 Liaison Counsel for Defendants

25 Dated: July 21, 2022

**ORRICK HERRINGTON & SUTCLIFFE
LLP**

26
27 *s/ Amy K. Van Zant*
28 _____
Amy K. Van Zant
Attorneys for Plaintiffs Francisco Gudino
Cardenas and Troy McFadyen, et al.

1 **[PROPOSED] ORDER**

2 The Court, having considered the Parties' Joint Stipulation to continue the deadline to
3 respond to Plaintiffs' First Amended Complaint, and good cause appearing, hereby ORDERS as
4 follows:

5 1. Defendants' deadline to respond to the Amended Complaint is hereby continued
6 and a proposed briefing schedule for demurrers shall be submitted for the Court's approval as part
7 of the Joint Case Management Statement currently due on September 1, 2022.

8 IT IS SO ORDERED.

9
10 Dated: 07/22/2022



11 The Honorable William D. Claster
12 Judge of the Superior Court

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF ORANGE

4 I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County,
5 California. I am over the age eighteen (18) years and am not a party to the within action. My
6 business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

7 On July 21, 2022, I served the foregoing document(s) described as:

8 **JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE TO
9 RESPOND TO AMENDED COMPLAINT**

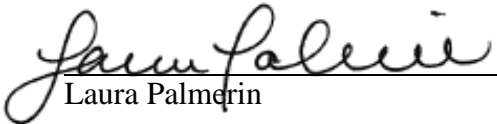
10 on the interested parties in this action by placing
11 [] the original
12 [X] a true and correct copy
13 thereof by the following means, addressed as follows:

14 Please see Attached Service List.

15 X (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic
16 transmission through One Legal. Said transmission was reported and completed without
17 error.

18 X (STATE) I declare under penalty of perjury under the laws of the State of California that
19 the foregoing is true and correct.

20 Executed on July 21, 2022, at Long Beach, California.

21 
22 _____
23 Laura Palmerin
24
25
26
27
28

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