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	· //	2	Caitlin M. Nelson (State Bar No. 335601) Lieff Cabraser Heimann & Bernstein, LLP	Philip H. Bangle (pro hac vice pending)
		2	275 Battery Street, 29th Floor	Brady: United Against Gun Violence 840 First Street, NE Suite 400
		3	San Francisco, CA 94111-3339 Telephone: 415.956.1000	Washington, DC 20002
	(4	Facsimile: 415.956.1008 rnelson@lchb.com	Facsimile: 202-898-8100 jlowy@bradyunited.org
	/	5	cnelson@lchb.com	pbangle@bradyunited.org JUL 2 2 2022
		6	Attorneys for Plaintiffs	Attorneys for Plaintiffs By I. Shaddix, Deputy Clerk
		7		
	Q	8	SUPERIOR COURT OF 1	THE STATE OF CALIFORNIA
	and the second	9	COUNTY O	F SACRAMENTO
	TAX	10		
•		11	KELLEY and DENIS O'SULLIVAN, in	Case No. 34-2021-00302934
		12	their Individual Capacity and KELLY O'SULLIVAN as Administrator of the Estate	NOTICE AND PLAINTIFFS' VERIFIED
		13	of TARA O'SULLIVAN, Deceased,	APPLICATION FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE;
		14	Plaintiffs,	NOTICE OF HEARING THEREON; AND [PROPOSED] ORDER
		15	v.	
		16	GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET; et al.,	
		17	Defendants.	
		18		
		19		
		20	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
		21	permitting Philip Bangle of the law firm of Br	ady: United Against Gun Violence, to appear in this
		22	action and be admitted to the bar of this Court	pro hac vice, pursuant to California Rule of Court
•		23	9.40.	
		24	DECLARATION OF ROBERT I	NELSON IN SUPPORT OF APPLICATION
		25		MISSION OF PHILIP BANGLE
		26	I, Robert J. Nelson, declare as follows:	
	RECEN	~7	1. I am a member in good standing	g of the State Bar of California and am a partner in
(MAV	·28	the firm of Lieff, Cabraser, Heimann & Bernst	tein, LLP, attorneys of record herein for Plaintiffs
	MAY 1 8 20	22	2383124.2	· · · · · · · · · · · · · · · · · · ·
\	16 CIVIL		VERIFIEI	D APPLICATION FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE

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

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2. My firm's co-counsel in this case include Brady: United Against Gun Violence (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.

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

15 16 17 Robert L Nelson (SBN 18 19 20 21 22 23 24 25 26 27 28 - 2 -2383124.2 VERIFIED APPLICATION FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE

VERIFIED APPLICATION OF PHILIP BANGLE FOR ADMISSION PRO HAC VICE

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

1. I reside in Washington, DC, and am an attorney with the Brady: United Against Gun Violence, 840 First Street, NE Suite 400, Washington, DC 20002, which is serving as cocounsel in this litigation. I have personal knowledge of the matters stated in this Application and 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.

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

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

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

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VERIFIED APPLICATION FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE

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. 1	8. I am not a resident of California, a		
. 2	not regularly engaged in substantial business, pro		
3	Pursuant to California Code of Civil Proc		
4	penalty of perjury under the laws of the State of C	California that the foregoing	is true and correct:
5	Dated this 17th day of May, 2022	VEL	
6	in Washington, D.C.	Philip H. Bangle	· · · ·
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VERIFICATION

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1	VERIFICATION	ī	
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3	I, Philip Bangle, under oath, declare as follows:		
4	1. I have been retained by Plaintiffs to appear	r in this action as an attorney on their	
5	behalf.		
6	2. The matters stated in the foregoing Applic	ation to Appear as Counsel Pro Hac	
7	<i>Vice</i> are true of my own knowledge and belief.		
8			
. 9	foregoing is true and correct.	· · ·	
10		RR /	
11	Dated this 17th day of May, 2022	Philip H. Bangle	
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	VERIFIED APPLICATION	FOR PRO HAC VICE ADMISSION OF PHILIP 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.

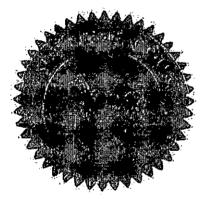
James M. Hivner Clerk of the Supreme Court of Tennessee

By: Adam F. Bennett.

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.

Lisa A. Dolph

Clerk of the Supreme Court

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SUPERIOR COURT OF T	THE STATE OF CALIFORNIA
	FSACRAMENTO
KELLEY and DENIS O'SULLIVAN, in	Case No. 34-2021-00302934
their Individual Capacity and KELLY O'SULLIVAN as Administrator of the Estate	[PROPOSED] ORDER GRANTING
of TARA O'SULLIVAN, Deceased,	APPLICATION FOR PRO HAC VIC ADMISSION OF PHILIP BANGLE;
Plaintiffs,	ACTION FILED: June 17, 2021
v .	1011010111222, June 17, 2021
GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET; et al.,	
Defendants.	
Defendants.	
After considering the foregoing	application and good cause appearing ther
After considering the foregoing IS ORDERED that the application of Philip E	
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2 I am over the age of eighteen years and not a party to the within-entitled action business address is 275 Battery Street, 29th Floor, San Francisco, CA 94111. I am return with this firm's practice for collection and processing of correspondence for mailing. United States Postal Service. On May18, 2022, I placed with this firm at the above at deposit with the United States Postal Service a true and correct copy of the within dot and processing of correspondence for mailing. United States Postal Service a true and correct copy of the within dot and processing of correspondence for mailing. United States Postal Service a true and correct copy of the within dot and processing of correspondence for mailing. United States Postal Service a true and correct copy of the within dot and processing of correspondence for mailing. United States Postal Service a true and correct copy of the within dot and processed as follows: 10 In a sealed envelope, postage fully paid, addressed as follows: 11 David A. Melton Molly A. Flores Molly A.	
 with this firm's practice for collection and processing of correspondence for mailing United States Postal Service. On May18, 2022, I placed with this firm at the above a deposit with the United States Postal Service a true and correct copy of the within do a 1 APPLICATION OF PHILIP BANGLE FOR ADMISSION <i>PRO</i>. 1 Application of the analysis of the within do 1 a sealed envelope, postage fully paid, addressed as follows: 1 David A. Melton 1 Marylo Smart 1 David A. Melton 1 Marylo Smart 1 Poter Scott Law Firm 1 350 University Ave, Suite 200 1 Sacramento, CA 1 Email: <u>dimetion@porterscott.com</u> 1 mil: <u>shard/Winchellawyers.com</u> 1 Telephone: 916.929.1481 1 Facsimile: 916.927.3706 1 Anthony M. Pisciotti 1 Danny Lallis 1 Danny Lallis 1 Danny Lallis 1 Danny Lallis 1 Tele; (973)245-8101 1 TEL: (973)245-8101 1 TEL: (973)245-8101 1 TEL: (973)245-8101 1 TECHNICAL SOLUTIONS LLC, <i>db/a</i> MATRUARMS COM, <i>AMESS TROMBLEE</i>, <i>JR</i>, <i>db/a</i> 1 Altorneys for Defendants, JAMES 1 Altorneys for Defendants, JAMES 1 Attorneys for Defendants, JAMES 1 At	ion. My
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13David A. MettoliSean A. Biady13Molly A. FloresMichel & Associates, P.C. Attorney14MaryJo SmartI80 East Ocean Boulevard, Suite 2014J50 University Ave, Suite 200Long Beach, CA 9080215Sacramento, CAEmail: dimelton@porterscott.com16mflores@porterscott.comTelephone: 562-216-444416msmart@porterscott.comAttorneys for Defendants, RYAN BE17Feacsimile : 916.929.1481Anthony M. Pisciotti18Anthony M. PisciottiGHOST FIREARMS LLC, d/b/a GR19Danny LallisDanny Lallis19Pisciotti Lallis Erdreich, P.C.INC., d/b/a 80PERCENTARMS.COM, JAMES2030 Columbia Turnpike, Suite 205ARMS, d/b/a MATRIXARMS.COM, JAMESMADISONT ACTICAL LLC, d/b/a GR21Florham Park, NJ 07932JAMESMADISONT ACTICAL LLC, d/b/a GR22FAX: (973)245-8100JAMESMADISONT ACTICAL COM, TACTICAL COM, TACTI	
13MaryJo Smart Poter Scott Law Firm 350 University Ave, Suite 200 Sacramento, CA180 East Ocean Boulevard, Suite 20 	
14350 University Ave, Suite 200Email: sbrady@michellawyers.com Telephone: 562-216-444415Sacramento, CAEmail: sbrady@michellawyers.com Telephone: 562-216-444416mflores@porterscott.com msmart@porterscott.comTelephone: 562-216-444516msmart@porterscott.com msmart@porterscott.comAttorneys for Defendants, RYAN BE AND BOB BEEZLEY d/b/a17Telephone: 916.929.1481 Facsimile : 916.927.3706Attorneys for Defendants, COM, TH GUNS LLC, d/b/a THUNDERTACT GHOST FIREARMS LLC, d/b/a GR DEFENSE and GHOSTRIFLES.COM18Anthony M. Pisciotti Danny Lallis Pisciotti Lallis Erdreich, P.C. 30 Columbia Turnpike, Suite 205 Florham Park, NJ 07932 TEL: (973)245-8100BLACKHAWK MANUFACTURING ARMS, d/b/a MATRIXARMS.COM, JAMESMADISONTACTICAL LLC, d/b/a21Florham Park, NJ 07932 TEL: (973)245-8101 Email: apisciotti@pisciotti.com dlallis@pisciotti.com rerdreich@pisciotti.comJAMESMADISONTACTICAL COM, TACTICAL GI BLACKHAWK BAOLSONTACTICAL COM, TACTICAL GI BDFACCEIVERS.COM Jbla BOPERCENTGUYS.COM24Attorneys for Defendants, JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COMSob Parcentiguys.com USA BAOLSON TACTICAL COM, TACTICAL COM, TACTICAL COM, TACTICAL SOLUTIONS LLC, d/b/a <b< th=""><th></th></b<>	
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17Facsimile : 916.927.3706 <i>RBTACTICIALTOOLING.COM, TH</i> <i>GUNS LLC, d/b/a THUNDERTACT</i> 18Anthony M. Pisciotti Danny Lallis <i>GHOST FIREARMS LLC, d/b/a GR</i> <i>GHOST FIREARMS LLC, d/b/a GR</i> <i>DEFENSE and GHOSTRIFLES.CO.</i> 19Ryan Erdreich Pisciotti Lallis Erdreich, P.C. 30 Columbia Turnpike, Suite 205 Florham Park, NJ 07932 TEL: (973)245-8100 22 <i>BLACKHAWK MANUFACTURING</i> <i>INC., d/b/a 80PERCENTARMS.COM, ARMS, d/b/a MATRIXARMS.COM, ARMS, d/b/a JSDSUPPLY.COM, ARMS, d/b/a JSDSUPPLY.COM and 80PERCENTGUYS.COM24Attorneys for Defendants, JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COMSOPERCENTGUYS.COM25USPATRIOTARMORY.COM(VIA EMAIL ONLY)</i>	EEZLEY
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 30 Columbia Turnpike, Suite 205 Florham Park, NJ 07932 TEL: (973)245-8100 FAX: (973)245-8101 Email: apisciotti@pisciotti.com dlallis@pisciotti.com rerdreich@pisciotti.com Attorneys for Defendants, JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM ARMS, d/b/a MATRIXARMS.COM, AMADISON TACTICAL LLC, d/b/a ARMS, d/b/a MATRIXARMS.COM, AMADISON TACTICAL LLC, d/b/a JAMESMADISONTACTICAL.COM, TACTICAL GI JAMESMADISONTACTICAL.COM, TACTICAL GI JAMESMADISONTACTICAL GI<!--</th--><th>G GROUP</th>	G GROUP
21TEL: (973)245-8100JAMESMADISONTACTICAL.COM22FAX: (973)245-8101JEMESMADISONTACTICAL.COM23Email: apisciotti@pisciotti.comJECHNICAL SOLUTIONS LLC, d/d23dlallis@pisciotti.comSDTACTICAL.COM, TACTICAL GI24Attorneys for Defendants, JAMESJSDSUPPLY.COM and25USPATRIOTARMORY.COM(VIA EMAIL ONLY)	, JAMES
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	VERIFIED	APPLICATION FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE

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• 1	State Bar of California Office of Special Admissions and
2	Specialization
3	180 Howard Street San Francisco, CA 94105
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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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	VERIFIED APPLICATION FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE
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