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**FILED/ENDORSED**  
 JUL 22 2022  
 By T. Shaddix, Deputy Clerk

*Attorneys for Plaintiffs*

*Attorneys for Plaintiffs*

BY FAX

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 Lieff, Cabraser, Heimann & Bernstein, LLP, attorneys of record herein for Plaintiffs

2383124.2

VERIFIED APPLICATION FOR PRO HAC VICE ADMISSION OF PHILIP BANGLE

RECEIVED  
 MAY 18 2022  
 16  
 CIVIL

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.

15  
16   
17 \_\_\_\_\_  
18 Robert J. Nelson (SBN 2999217)

1     **VERIFIED APPLICATION OF PHILIP BANGLE FOR ADMISSION PRO HAC VICE**

2  
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 Lief  
25 Cabraser Heimann & Bernstein, LLP, 275 Battery St., 29<sup>th</sup> 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*

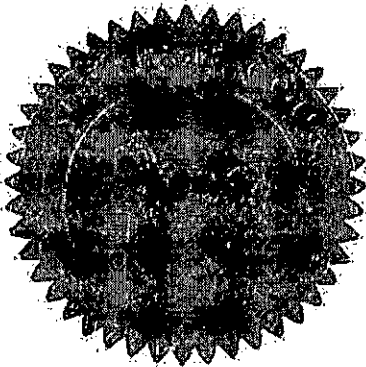
By: 

*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 7<sup>th</sup> 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.  
14

Case No. 34-2021-00302934

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

ACTION FILED: June 17, 2021

15 After considering the foregoing application and good cause appearing therefor, **IT**  
16 **IS ORDERED** that the application of Philip Bangle to appear *pro hac vice* is GRANTED.  
17

18 DATED: 7/22/22

19   
20 Judge of the Superior Court

JILL H. TALLEY



For taking

**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, 29<sup>th</sup> 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  
350 University Ave, Suite 200  
Sacramento, CA  
Email: [dmelton@porterscott.com](mailto:dmelton@porterscott.com)  
[mflores@porterscott.com](mailto:mflores@porterscott.com)  
[msmart@porterscott.com](mailto:msmart@porterscott.com)  
Telephone: 916.929.1481  
Facsimile : 916.927.3706

Anthony M. Piscioti  
Danny Lallis  
Ryan Erdreich  
Piscioti Lallis Erdreich, P.C.  
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Florham Park, NJ 07932  
TEL: (973)245-8100  
FAX: (973)245-8101  
Email: [apiscioti@piscioti.com](mailto:apiscioti@piscioti.com)  
[dlallis@piscioti.com](mailto:dlallis@piscioti.com)  
[rerdreich@piscioti.com](mailto:rerdreich@piscioti.com)

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

(VIA EMAIL ONLY)

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Email: [sbrady@michellawyers.com](mailto:sbrady@michellawyers.com)  
Telephone: 562-216-4444  
Facsimile : 562-216-4445

*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: <a href="mailto:hschilsky@renzullilaw.com">hschilsky@renzullilaw.com</a>  Telephone: 914-285-0700  Facsimile : 914-285-1213</p> <p>Richard Linkert  Matheny Sears Linkert &amp; Jaime LLP  3638 American River Drive  Sacramento, CA 95864-4711  <a href="mailto:rlinkert@mathenysears.com">rlinkert@mathenysears.com</a></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: <a href="mailto:wjenkins@ericksenarbuthnot.com">wjenkins@ericksenarbuthnot.com</a>  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 &amp; McElroy PC  2401 American River Drive, Suite 100  Sacramento, CA 95825  Email: <a href="mailto:dpollock@jacobsenmcelroy.com">dpollock@jacobsenmcelroy.com</a>  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 &amp; Dolin PC  5901 W. Century Blvd., Suite 1100  Los Angeles, CA 90045  Email: <a href="mailto:gwaterkotte@pettitkohn.com">gwaterkotte@pettitkohn.com</a>  <a href="mailto:trobinson@pettitkohn.com">trobinson@pettitkohn.com</a>  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: <a href="mailto:germain.labat@gmlaw.com">germain.labat@gmlaw.com</a>  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: <a href="mailto:james.mcguire@gmlaw.com">james.mcguire@gmlaw.com</a></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.

11 Caitlin Nelson

12 Caitlin Nelson  
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