

1 AMY K. VAN ZANT (STATE BAR NO. 197426)
avanzant@orrick.com
2 SHAYAN SAID (STATE BAR NO. 331978)
ssaid@orrick.com
3 AMANDA H. SCHWARTZ (*PRO HAC VICE*)
aschwartz@orrick.com
4 DANNY BAREFOOT (*PRO HAC VICE*)
rbarefoot@orrick.com
5 C. ANNE MALIK (*PRO HAC VICE*)
amalik@orrick.com
6 CHRISTIE BOYDEN (*PRO HAC VICE*)
cboyden@orrick.com
7 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
8 Menlo Park, CA 94025-1015
Telephone: +1 650 614 7400
9 Facsimile: +1 650 614 7401

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

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

14
15 GHOST GUNNER FIREARMS CASES

JCCP No. 5167

16 Included actions:

Superior Court of California
County of Orange
Case No. 30-2019-01111797-CU-PO-
CJC

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

Superior Court of California
County of San Bernardino
Case No. CIV-DS-1935422

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20 CIV-DS-1935422 *McFadyen, et al. v. Ghost Gunner,
Inc., dba GhostGunner.net, et al.*

21 **JOINT STIPULATION AND**
22 **[PROPOSED] ORDER TO**
23 **CONTINUE DEADLINE TO**
24 **RESPOND TO DEFENDANT**
25 **JUGGERNAUT TACTICAL,**
26 **INC.'S MOTION FOR**
27 **SANCTIONS**

28
Date: September 16, 2022
Time: 9:00 a.m.
Dept.: CX 104
Judge: Hon. William D. Cluster

1 **JOINT STIPULATION**

2 The Parties respectfully submit this Joint Stipulation requesting an extension on the
3 deadlines for the opposition and reply briefing for Defendant Juggernaut Tactical, Inc.’s Motion
4 for Sanctions, and to reset the hearing date.

5 WHEREAS, Juggernaut Tactical filed its Notice of Motion and Motion for Sanctions
6 Pursuant to California Code of Civil Procedure Section 128.7 on August 17, 2022 with an
7 original hearing date of September 16, 2022;

8 WHEREAS, lead counsel for Plaintiffs is not available on September 16, 2022;

9 WHEREAS, the Parties have since conferred and agreed to reset the hearing date from
10 September 16, 2022 to October 7, 2022, or as soon after as the parties can be heard, and to jointly
11 request that the Court approve an extension on the remaining briefing schedule such that the
12 deadline for filing Plaintiffs’ opposition brief shall be extended from September 2, 2022 to
13 September 13, 2022, and the deadline for Juggernaut Tactical’s reply brief is extended from
14 September 9 to September 30, 2022.

15 THEREFORE, the Parties respectfully request the court enter an Order extending the
16 briefing deadlines as requested herein and continuing the hearing date from September 16, 2022
17 to October 7, 2022, or as soon after as the parties can be heard.

18 Respectfully submitted,

19 Dated: September 6, 2022

ORRICK HERRINGTON & SUTCLIFFE LLP

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21 By: /s/ Amy K. Van Zant
 AMY K. VAN ZANT
 Attorneys for Plaintiffs
 Francisco Gudino Cardenas and
 Troy McFadyen, et al.

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23 RENZULLI LAW FIRM LLP

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25 By: /s/ Howard Schilsky
 Howard Schilsky
 Attorneys for Defendant
 Juggernaut Tactical, Inc.

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[PROPOSED] ORDER

The Court, having considered the Parties' Joint Stipulation to continue the deadline to respond to Defendant Juggernaut Tactical's Motion for Sanctions, and good cause appearing, hereby ORDERS as follows:

1. Plaintiffs' opposition brief deadline is extended to September 13, 2022.
2. Juggernaut Tactical's reply brief deadline is extended to September 30, 2022.
3. The hearing date for the motion is continued from September 16, 2022 to October 14, 2022 at 9:00 a.m. in Department CX104.

IT IS SO ORDERED.



Dated: 09/02/2022

The Honorable William D. Claster
Judge of the Superior Court

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 September 6, 2022, I served the following document(s) entitled:

- 6 • **JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE DEADLINE
7 TO RESPOND TO DEFENDANT JUGGERNAUT TACTICAL, INC.’S MOTION
8 FOR SANCTIONS**

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

	(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.

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
20 cmichel@michellawyers.com
21 sbrady@michellawyers.com

22
23 *Liaison Counsel and Attorneys for Defendants*
24 *Ghost Firearms, LLC, Thunder Guns, LLC,*
25 *and MFY Technical Solutions, LLC*

26
27 I declare under penalty of perjury under the laws of the State of California that the above
28 is true and correct.

Executed on September 6, 2022 at Moss Beach, California.

/s/ Karin Barnick