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10 Attorneys for Defendant  
JUGGERNAUT TACTICAL INC.

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 IN AND FOR THE COUNTY OF ORANGE - CIVIL COMPLEX CENTER  
13  
14 Hon. William D. Claster, Coordination Trial Judge

15 Coordination Proceeding Special ) Case No. JCCP 5167  
16 Title (Rule 3.550) )  
17 GHOST GUNNER FIREARMS CASES ) SUPERIOR COURT OF CALIFORNIA  
18 Included actions: ) COUNTY OF ORANGE  
19 Cardenas v. Ghost Gunner, Inc. dba ) CASE NO. 30-2019-01111797  
GhoseGunner.net, et al. ) SUPERIOR COURT OF CALIFORNIA  
20 ) COUNTY OF SAN BERNARDINO  
21 McFadyen, et al. v. Ghost Gunner, Inc. dba ) CASE NO. CIVDS193452  
22 GhostGunner.net, et al. )  
23 ) **SUPPLEMENTAL DECLARATION OF**  
24 ) **HOWARD B. SCHILSKY IN SUPPORT**  
25 ) **OF DEFENDANT JUGGERNAUT**  
26 ) **TACTICAL, INC.'S REPLY IN SUPPORT**  
27 ) **OF ITS MOTION FOR SANCTIONS**  
28 ) **PURSUANT TO CALIFORNIA CODE OF**  
 ) **CIVIL PROCEDURE SECTION 128.7**  
 ) **Res ID: 73828153**  
 ) **Date: October 14, 2022**  
 ) **Time: 9:00 a.m.**  
 ) **Dept.: CX104**

5368814

1 **SUPPLEMENTAL DECLARATION OF HOWARD SCHILSKY**

2 I, Howard Schilsky, declare and affirm:

3 1. I am an attorney duly licensed to practice law before all courts of the State of New  
4 York and the United States District Court for the Southern District of New York. I am admitted  
5 *pro hac vice* with respect to the defense of Defendant Juggernaut Tactical, Inc. (“Juggernaut  
6 Tactical”) in this case. I am a member in good standing with the State Bar of New York. I have  
7 personal knowledge of the following facts, except for those based on information and belief,  
8 which I believe to be true, and if called upon to testify, I could and would competently testify to  
9 their truth and accuracy.

10 2. This supplemental declaration is submitted in support of Juggernaut Tactical’s  
11 Reply in Support of Motion for Sanctions Pursuant to California Code of Civil Procedure Section  
12 128.7.

13 3. Attached hereto as Exhibit “A” is a true and correct copy of the e-mail  
14 correspondence dated May 20, 2022, from Counsel for Tehama County, Jonz Norine.

15 I declare under penalty of perjury under the laws of the State of California that the  
16 foregoing is true and correct, and that this declaration was executed this 29th day of September  
17 2022 at White Plains, NY.

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20 Howard Schilsky, Declarant

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# EXHIBIT A

## Howard Schilsky

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**From:** Jonz Norine <Jnorine@lawnorcal.com>  
**Sent:** Friday, May 20, 2022 4:08 PM  
**To:** Howard Schilsky  
**Cc:** Sean Brady; Van Zant, Amy K.; Crystal L. Van Der Putten; rerdreich@pisciotti.com; Michael E. Gallagher; Craig A. Livingston; Grant D. Waterkotte; Nicholas T. Maxwell; Kyle J. Gaines; Desiree Caudillo; Christopher Renzulli; creilly@pettitkohn.com; Laura Palmerin; gsingleton@singletonschreiber.com; catie; brandon; estee; doug@ca-lawyer.com; Said, Shayan; Fukushima, Ric T.; Ben Rosenfeld; jlowy; Philip Bangle; Robert Cross; GhostGunLitigation\_OHS; James McGuire; Michael Patrick; Germain D. Labat; Puneet Bhullar; Marc Walkow; Michael Marron; Tamara Warren; Linda Schaap; Jonz Norine  
**Subject:** RE: [EXTERNAL] Ghost Gun Inspection in Red Bluff [IWOV-Interwoven.FID86581] [MA-Interwoven.FID86581]  
**Attachments:** Gun Inspection Confidentiality Agreement.docx

All,

As you prepare for next week's gun inspection, please note the following:

The inspection starts at 9 am at the Tehama County Sheriff's Office at 22840 Antelope Blvd., Red Bluff, CA. It will end by 5 pm or sooner that day.

There will be a sign-in for all attendees. Each attendee will need to provide a business card with all contact information. (It has been my experience that lawyers and their entourage have horrendous handwriting on sign-in sheets).

There will be a Confidentiality Agreement for all attorneys to execute on behalf of their clients and experts. See attached. It can be filled out ahead of time and emailed to me or can be executed prior to the start of the inspection on site. The language is essentially the same language as the Confidentiality Agreement that the attorneys have already signed in the Phommathep et al. v Tehama County cases that my office is defending.

I have made arrangements to have the entirety of the inspection videographed. If you will want copies of the video, you can make arrangements to receive and pay for such with the videographer, Redding Video Productions.

<https://www.reddingvideoproductions.com/>

The room is large enough to accommodate all attendees so there should be no need for real time video outside of the room.

Attendees are welcome to take photographs per the protocol below, but no audio or video will be allowed by the parties since we have an independent third party doing that for us.

All guns recovered from the shooter whether used or not in the event will be available for inspection. My understanding is that these include:

- .40 Cal S&W M&M Semi Auto
- Incomplete Semi Auto Rifle
- Mossberg 500A Pump
- Eagle Arms Companion Single Shot 410
- Unfinished lower receiver AR Style

Gun Frame Lower  
AR-15 Style Rifle  
AR Style Rifle Mag w 4 cartridges  
Glock 21  
AR Style Rifle & Mag w 29 Cartridges

There will be no firing of the guns and no destructive testing of any item.  
No questions regarding the incident, underlying cases, collection of evidence, or other matter pertaining to the facts of the cases will be asked of Sheriff's Office Personnel at the inspection.

The default protocol will be to have only Sheriff's Office Personnel handling the items; however, for sake of expediency and convenience, experts will be allowed to handle them as deemed prudent by Sheriff's Office Personnel.

Allowable inspection protocol will include:

Removal of grip  
Separation of lower receiver from upper receiver  
Removal of bolt carrier, bolt, and charging handle  
Taking close up photos  
Using digital microscope  
Caliper measuring  
Radius measuring

If you have questions, please email or call.

[jnorine@lawnorcal.com](mailto:jnorine@lawnorcal.com)

530.262.2600 (cell)

See you Tuesday



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primary: 530.262.2600 | secondary: 530.244.7777 | [www.LawNorCal.com](http://www.LawNorCal.com)

1 **Re: Ghost Gunner Firearms Cases**  
2 **Orange County Superior Court Case No. JCCP 5167**

3 **PROOF OF SERVICE – CCP §1013(a)(3)**

4 STATE OF CALIFORNIA/COUNTY OF Los Angeles

5 I am a citizen of the United States and an employee in the County of Los Angeles. I am  
6 over the age of eighteen (18) years and not a party to the within action. My business address is  
7 EDLIN GALLAGHER HUIE + BLUM LLP, 515 S. Flower Street, Suite 1020, Los Angeles,  
8 California 90071.

9 On the date set forth below, I served the within:

10 **SUPPLEMENTAL DECLARATION OF HOWARD B. SCHILSKY IN SUPPORT OF**  
11 **DEFENDANT JUGGERNAUT TACTICAL, INC.’S REPLY IN SUPPORT OF ITS**  
12 **MOTION FOR SANCTIONS PURSUANT TO CALIFORNIA CODE OF CIVIL**  
13 **PROCEDURE SECTION 128.7**

14 on the following parties:

15 SEE ATTACHED SERVICE LIST

16 **BY PERSONAL SERVICE:** I caused a copy of said documents to be hand  
17 delivered to the interested party at the address set forth above.

18 **X BY ELECTRONIC MAIL:** Based upon stipulation and agreement of the parties for  
19 service by electronic transmission, I caused said document(s) to be sent to the persons  
20 at the electronic mail address listed above. I did not receive within a reasonable  
21 amount of time after the transmission, any electronic message or other indication that  
22 the transmission was not successful.

23 **BY MAIL:** I caused such envelope to be deposited in the mail at Los Angeles,  
24 California. I am readily familiar with the firm’s practice for collection and processing  
25 of correspondence for mailing. It is deposited with the U.S. Postal Service on that  
26 same day in the ordinary course of business.

27 **BY FEDERAL EXPRESS:** I caused such envelope to be deposited in the appropriate  
28 Federal Express envelope, to the Federal Express office located at 515 S. Flower  
Street, Suite 1020, Los Angeles, California 90071, to be delivered by the next business  
day. I am readily familiar with the firm’s practice for collection and processing of  
correspondence for transmittal by Federal Express. It is deposited with Federal  
Express on that same day in the ordinary course of business.

**BY FACSIMILE:** I caused said documents to be sent via facsimile to the interested  
party at the facsimile number set forth below.

I declare under penalty of perjury that the foregoing is true and correct and that this  
document is executed on September 30, 2022, at Los Angeles, California.



DESIREE CAUDILLO

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1 **SERVICE LIST**

2 Ghost Gunner Firearms Cases

3 Our Clients: Juggernaut Tactical Inc.

4 Orange County Superior Court Case No. JCCP 5167 (30-2019-01111797)

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