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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 ( <i>PRO HAC VICE</i> )	
4	aschwartz@orrick.com DANNY BAREFOOT ( <i>PRO HAC VICE</i> )	
5	rbarefoot@orrick.com 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	
9	Telephone: +1 650 614 7400 Facsimile: +1 650 614 7401	
10	Attorneys for Plaintiffs	
11	Francisco Gudino Cardenas and Troy McFadyen, et al	
	SUPERIOR COURT OF THE STA	ATE OF CALIFORNIA
12	COUNTY OF ORANGE	
13	COUNTY OF OR	ANGE
14	GHOST GUNNER FIREARMS CASES	JCCP No. 5167
15	To also de discoviciones	Superior Court of California
16	Included actions:	County of Orange Case No. 30-2019-01111797-CU-PO-
17	30-2019-01111797-CU-PO-CJC Cardenas v. Ghost	CJC
18	Gunner, Inc. dba GhostGunner.net, et al.	Superior Court of California County of San Bernardino
		Case No. CIV-DS-1935422
19	CIV-DS-1935422 McFadyen, et al. v. Ghost Gunner, Inc., dba GhostGunner.net, et al.	
20		JOINT NOTICE OF SETTLEMENT DISCUSSIONS
21		AND STIPULATION AND [PROPOSED] ORDER TO
22		VACATE THE OCTOBER 14, 2022 HEARING ON DEFENDANT
23		JUGGERNAUT TACTIAL, INC.'S
24		MOTION FOR SANCTIONS AND DISMISSAL
25		Date: N/A
26		Time: N/A Dept.: CX 104
27		Judge: Hon. William D. Claster
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## 1 JOINT STIPULATION 2 Plaintiffs Francisco Gudino Cardenas and Troy McFayden, et al. ("Plaintiffs") and 3 Defendant Juggernaut Tactical, Inc. ("Defendant") (collectively, the "Parties") through their 4 respective counsel of record, hereby file the following Joint Notice of Settlement Discussions and 5 Stipulation to Stay All Deadlines and Hearings. 6 WHEREAS the Parties are currently engaged in good faith settlement discussions that 7 they believe may lead to resolution of the case; 8 WHEREAS there is a hearing scheduled for Juggernaut's Motion for Sanctions and 9 Dismissal set for October 14, 2022; 10 WHEREAS Juggernaut intends to withdraw its Motion for Sanctions and Dismissal in the event the Parties settle; 11 12 WHEREAS the Parties wish to conserve the Court's resources while they complete 13 settlement discussions; 14 THEREFORE, the Parties jointly request that the Court vacate the current October 14, 2022 hearing date for Juggernaut's Motion for Sanctions, to be reset at the request of Juggernaut 15 16 if the parties have been unable to successfully settle by October 31, 2022. 17 Respectfully submitted. 18 AMY K. VAN ZANT Dated: October 11, 2022 Orrick, Herrington & Sutcliffe LLP 19 20 By: /s/ Amy K. Van Zant 21 AMY K. VAN ZANT Attorneys for Plaintiffs 22 Francisco Gudino Cardenas and Troy McFayden, et al. and Liaison Counsel for 23 **Plaintiffs** 24 25 By: /s/ *Howard Schilsky* **Howard Schilsky** 26 Attorneys for Defendant Juggernaut Tactical, Inc. 27 28

## [PROPOSED] ORDER The Court, having considered the Parties' Notice of Settlement Discussions and Joint Stipulation to vacate the October 14, 2022 hearing for Juggernaut's Motion for Sanctions, and good cause appearing, hereby ORDERS as follows: The October 14, 2022 hearing for Juggernaut's Motion for Sanctions, is vacated. 1. 2. Juggernaut may reset the hearing if the parties have been unable to successfully settle by October 31, 2022. IT IS SO ORDERED. Dated: The Honorable William D. Claster Judge of the Superior Court

ORRICK, HERRINGTON &
SUTCLIFFE LLP
ATTORNEYS AT LAW
SILICON VALLEY

## 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 October 11, 2022, I served the following document(s) entitled: JOINT NOTICE OF SETTLEMENT DISCUSSIONS AND STIPULATION TO 6 VACATE THE OCTOBER 14, 2022 HEARING ON DEFENDANT JUGGERNAUT 7 TACTIAL, INC.'S MOTION FOR SANCTIONS AND DISMISSAL 8 on all interested parties to this action in the manner described as follows: 9 (VIA EMAIL) I caused to be transmitted via electronic mail the document(s) listed above to the electronic address(es) set forth below. 10 X (VIA Electronic Means) I caused to be transmitted via electronic means the 11 document(s) listed above to the electronic address(es) set forth below. 12 (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 13 addressed as set forth below. 14 C.D. Michel Christopher Renzulli Howard B. Schilsky Sean A. Brady 15 Renzulli Law Firm, LLP MICHEL & ASSOCIATES, P.C. 16 One North Broadway, Suite 1005 180 E. Ocean Blvd., Suite 200 Long Beach, CA 90802 White Plains, NY 10601 17 cmichel@michellawyers.com crenzulli@renzullilaw.com sbrady@michellawyers.com hschilsky@renzullilaw.com 18 Liaison Counsel and Attorneys for Attorneys for Defendant Juggernaut 19 Tactical, Inc. Defendants Ghost Firearms, LLC, 20 Thunder Guns, LLC, Ryan Beezley and Bob Beezley, 21 and MFY Technical Solutions, LLC 22 23 I declare under penalty of perjury under the laws of the State of California that the above 24 is true and correct. 25 Executed on October 11, 2022 at Moss Beach, California. 26 /s/ Karin Barnick 27 28