

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): <b>Richard Giller</b> <b>SBN 117823</b> <b>Greenspoon Marder LLP</b> <b>1875 Century Park E, Ste 1900, Los Angeles, CA 90067-2519</b> TELEPHONE NO.: <b>323-880-4520</b> FAX NO.: <b>N/A</b> ATTORNEY FOR (Name): <b>Polymer80, Inc.</b>		FOR COURT USE ONLY <div style="border: 1px solid black; padding: 5px; text-align: center;"> <b>FILED/ENDORSED</b>  <b>JUL 25 2023</b> </div> By: <u>          K. Fay          </u> Deputy Clerk	
NAME OF COURT: <b>Sacramento County Superior Court</b> STREET ADDRESS: <b>720 9th Street</b> MAILING ADDRESS: <b>720 9th Street</b> CITY AND ZIP CODE: <b>Sacramento, CA 95814</b> BRANCH NAME: <b>Gordan D. Schaber Sacramento County Courthouse</b>			
CASE NAME: <b>O'Sullivan v. Ghost Gunner Inc.</b>		CASE NUMBER: <b>34-2021-00302934-CU-PO-GDS</b>	
<b>NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL—CIVIL</b>		HEARING DATE: <b>October 6, 2023</b> DEPT.: <b>27</b> TIME: <b>9:00 a.m.</b> BEFORE HON.: <b>Jill H. Talley</b> DATE ACTION FILED: <b>June 17, 2021</b> TRIAL DATE: <b>No Trial Date Set</b>	

Reservation #A-302934-001

TO (name and address of client): **Polymer80, Inc.**  
**134 Lakes Blvd, Dayton, NV 89403**

1. PLEASE TAKE NOTICE that (name of withdrawing attorney): **Richard Giller** moves under California Code of Civil Procedure section 284(2) and California Rules of Court, rule 3.1362, for an order permitting the attorney to be relieved as attorney of record in this action or proceeding.

2. A hearing on this motion to be relieved as counsel will be held as follows:

a. Date: <b>October 6, 2023</b>	Time: <b>9:00 a.m.</b>	Dept.: <b>27</b>	Room:
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b. The address of the court: ☒ same as noted above ☐ other (specify):

3. This motion is supported by the accompanying declaration, the papers and records filed in this action or proceeding, and the following additional documents or evidence (specify):  
**MC-052 Declaration in Support of Attorney's Motion to Be Relieved as Counsel—Civil**

(This motion does not need to be accompanied by a memorandum of points and authorities. Cal. Rules of Court, rule 3.1362.)

4. The client presently represented by the attorney is

- |  |  |
|--|--|
| a. <input type="checkbox"/> an individual.<br>b. <input checked="" type="checkbox"/> a corporation.<br>c. <input type="checkbox"/> a partnership.<br>d. <input type="checkbox"/> an unincorporated association.<br>e. <input type="checkbox"/> a guardian.<br>f. <input type="checkbox"/> a conservator. | g. <input type="checkbox"/> a trustee.<br>h. <input type="checkbox"/> a personal representative.<br>i. <input type="checkbox"/> a probate fiduciary.<br>j. <input type="checkbox"/> a guardian ad litem.<br>k. <input type="checkbox"/> other (specify): |
|--|--|

(Continued on reverse)

**BY FAX**

CASE NAME:

O'Sullivan v. Ghost Gunner Inc.

CASE NUMBER:

34-2021-00302934-CU-PO-GDS

**NOTICE TO CLIENT**

If this motion to be relieved as counsel is granted, your present attorney will no longer be representing you. You may not in most cases represent yourself if you are one of the parties on the following list:

- A guardian
- A conservator
- A trustee
- A personal representative
- A probate fiduciary
- A corporation
- A guardian ad litem
- An unincorporated association

If you are one of these parties, YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE REGARDING LEGAL REPRESENTATION. Failure to retain an attorney may lead to an order striking the pleadings or to the entry of a default judgment.

5. If this motion is granted and a client is representing himself or herself, the client will be solely responsible for the case.

**NOTICE TO CLIENT WHO WILL BE UNREPRESENTED**

If this motion to be relieved as counsel is granted, you will not have an attorney representing you. You may wish to seek legal assistance. If you do not have a new attorney to represent you in this action or proceeding, and you are legally permitted to do so, you will be representing yourself. It will be your responsibility to comply with all court rules and applicable laws. If you fail to do so, or fail to appear at hearings, action may be taken against you. You may lose your case.

6. If this motion is granted, the client must keep the court informed of the client's current address.

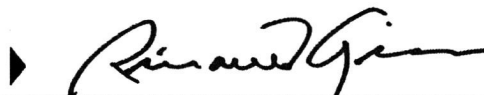
**NOTICE TO CLIENT WHO WILL BE UNREPRESENTED**

If this motion to be relieved as counsel is granted, the court needs to know how to contact you. If you do not keep the court and other parties informed of your current address and telephone number, they will not be able to send you notices of actions that may affect you, including actions that may adversely affect your interests or result in your losing the case.

Date: July 25, 2023

Richard Giller

(TYPE OR PRINT NAME)



(SIGNATURE OF ATTORNEY)

Attorney for (name): Polymer80, Inc.

1 **PROOF OF SERVICE**

2 *Kelley and Denis O'Sullivan, et al. v. Ghost Gunner Inc., et al.*  
3 Case No. 34-2021-00302934-CU-PO-GDS

4 STATE OF CALIFORNIA )  
5 ) ss  
6 COUNTY OF LOS ANGELES )

7 I am employed in the County of Los Angeles, State of California. I am over the age of  
8 eighteen years and not a party to the action. My business address is 1875 Century Park East, Suite  
9 1900, Los Angeles, California 90067. On July 25, 2023, I served the document(s) on the interested  
10 parties in this action as follows:


11 **NOTICE OF MOTION AND MOTION TO BE RELIEVED AS COUNSEL-CIVIL**

12 By placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

13 **SEE ATTACHED SERVICE LIST)**

- 14 ☐ **BY E-MAIL SERVICE:** By agreement of the parties, e-mail shall equal personal service.
- 15 ☒ **BY ELECTRONIC MAIL-** I caused the foregoing document(s) to be served on all parties  
16 at the e-mail addresses listed herein.
- 17 ☒ **BY MAIL:** The envelope was mailed with postage thereon fully prepaid. I am "readily  
18 familiar" with the firm's practice of collection and processing correspondence for mailing.  
19 Under that practice it would be deposited with the U.S. postal service on that same day with  
20 postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.  
21 I am aware that on motion of the party served, service is presumed invalid if the postal  
22 cancellation date or postage meter date is more than one day after service of deposit for  
23 mailing in affidavit.
- 24 ☒ **BY OVERNIGHT DELIVERY:** By causing such envelope to be deposited or delivered in  
25 a box or other facility regularly maintained by Federal Express authorized to receive  
26 documents, or delivering to a courier or driver authorized by said express service carrier to  
27 receive documents, the copy of the foregoing document in a sealed envelope designated by  
28 the express service carrier, addressed as stated above, with fees for overnight (next business  
day) delivery paid or provided for and causing such envelope to be delivered by said  
express service carrier on [Insert Date].
- ☐ **BY PERSONAL SERVICE:** I caused to be delivered the foregoing document(s) to the  
addressee(s) specified.
- ☒ [State] I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct.

Executed July 25, 2023, at Los Angeles, California.

26   
27 Tereza Perez

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**KELLEY AND DENIS O'SULLIVAN, IN  
THEIR INDIVIDUAL CAPACITY AND  
KELLEY O'SULLIVAN AS ADMINISTRATOR  
FOR THE ESTATE OF TARA O'SULLIVAN,  
DECEASED.**

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*KELLEY AND DENIS O'SULLIVAN, IN  
THEIR INDIVIDUAL CAPACITY AND  
KELLEY O'SULLIVAN AS ADMINISTRATOR  
FOR THE ESTATE OF TARA O'SULLIVAN,  
DECEASED.*

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1 **Via E-Mail**

2 Anthony M. Piscioti  
3 Danny Lallis  
4 Ryan Erdreich  
5 **PISCIOTTI LALLIS ERDREICH, P.C.**  
6 30 Columbia Turnpike, Suite 205  
7 Florham Park, NJ 07932

8 Telephone: (973) 245-8100  
9 Facsimile: (973) 245-8101  
10 E-Mail: [apisciottiapisciotti.com](mailto:apisciottiapisciotti.com)  
11 [dlallis@oisciotti.com](mailto:dlallis@oisciotti.com)  
12 [rerdreich@pisciotti.com](mailto:rerdreich@pisciotti.com)

*Attorneys for Defendants*  
**JAMES TROMBLEE, JR., D/B/A**  
**USPATRIOTARMORY.COM**

13 **Via E-Mail**

14 Richard Linkert  
15 **MATHENY SEARS LINKERT & JAIME LLP**  
16 3638 American River Drive  
17 Sacramento, CA 95864-4711  
18 E-Mail: [rlinkert@mathenvsears.com](mailto:rlinkert@mathenvsears.com)

*Attorneys for Defendant*  
**JUGGERNAUT TACTICAL, INC.**  
**D/B/A JTACTICAL.COM**

19 **Via E-Mail**

20 Grant D. Waterkotte  
21 Tina M. Robinson  
22 **PETTIT KOHN INGRASSIA LUTZ & DOLIN PC**  
23 5901 W. Century Blvd., Suite 1100  
24 Los Angeles, CA 90045  
25 Telephone: (310) 649-5772  
26 Facsimile: (310) 649-5777  
27 Email: [gwaterkotte@pettitkohn.com](mailto:gwaterkotte@pettitkohn.com)  
28 [trobinson@pettitkohn.com](mailto:trobinson@pettitkohn.com)

*Attorneys for Defendant*  
**GHOST GUNNER INC., d/b/a**  
**GHOSTGUNNER.NET**

29 **Via E-Mail**

30 William A. Jenkins, Esq.  
31 **ERICKSEN ARBUTHNOT**  
32 100 Howe Ave., Ste. 110S  
33 Sacramento, CA 95825  
34 E-Mail: [wjenkins@ericksenarbuthnot.com](mailto:wjenkins@ericksenarbuthnot.com)  
35 Telephone: (916) 483-5181 ext.223  
36 Facsimile: (916) 483-7558

*Attorneys for Defendant*  
**WM. C. ANDERSON, INC., d/b/a**  
**ANDERSONMANUFACTURING.COM**

1 **Via E-Mail**

2 Sean A. Brady  
3 **MICHEL & ASSOCIATES, P.C.**  
4 **ATTORNEYS AT LAW**  
180 East Ocean Boulevard, Suite 200  
Long Beach, CA 90802

5 Telephone: 562-216-4444  
6 Facsimile : 562-216-4445  
E-Mail: [sbradv@bmichellawvers.com](mailto:sbradv@bmichellawvers.com)

***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

14 **Via E-Mail**

15 David H. Pollock  
16 **JACOBSEN & MCELROY PC**  
2401 American River Drive, Suite 100  
17 Sacramento, CA 95825

18 Telephone: (916) 971-4100 Ext. 231  
19 Facsimile: (916) 971-4150  
Email: [dpollock@jacobsenmcelroy.com](mailto:dpollock@jacobsenmcelroy.com)

20 **Via U.S. Mail**

21 M-16 PARTS SUPPLY LLC, d/b/a M-16PARTS.COM  
22 c/o Terry J. Weisflog  
5918 England Avenue  
23 Orlando, FL 32808

24 **Via U.S. Mail**

25 INDUSTRY ARMAMENT INC., d/b/a  
26 AMERICANWEAPONSCOMPONENTS.COM  
CT Corp Trust Co  
27 1209 N Orange Street  
Wilmington, DE 19801-1120

1 **Via U.S. Mail**

2 Bar of California  
3 Office of Special Admissions and  
4 Specialization  
5 180 Howard Street  
6 San Francisco, CA 94105

7 **Via Overnight Mail Only**

8 Polymer80, Inc.  
9 134 Lakes Blvd.  
10 Dayton, NV 89403  
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## **Tereza Perez**

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**From:** Shaddix, Trevor <Shaddit@saccourt.ca.gov>  
**Sent:** Monday, July 24, 2023 1:48 PM  
**To:** Melody Langley; Richard Giller  
**Cc:** Tereza Perez; James Duncan  
**Subject:** RE: MOTION HEARING REQUEST --RE: O'Sullivan v. Ghost Gunner, Inc. Case No. 34-2021-00302934-CU-PO-GDS

Hello,

This matter has reserved a hearing on October 6, 2023 at 9:00 a.m in department 27 for motion to be relieved as counsel. Please use reservation # A-302934-001 on your filings.

Thanks,  
Trevor Shaddix  
Dept 27

---

**From:** Melody Langley <Melody.Langley@gmlaw.com>  
**Sent:** Monday, July 24, 2023 1:44 PM  
**To:** Shaddix, Trevor <Shaddit@saccourt.ca.gov>; Richard Giller <Richard.Giller@gmlaw.com>  
**Cc:** Tereza Perez <Tereza.Perez@gmlaw.com>; James Duncan <James.Duncan@gmlaw.com>  
**Subject:** RE: MOTION HEARING REQUEST --RE: O'Sullivan v. Ghost Gunner, Inc. Case No. 34-2021-00302934-CU-PO-GDS

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Hi Trevor,

Thank you for your email, see information below:

Case Name: O'Sullivan v. Ghost Gunner, Inc.  
Case Number: 32-2021-00302934-CU-PO-GDS  
Selected Date: 10/6/23 at 9:00 a.m.  
Type of Motion: Motion to Be Relieved As Counsel for Polymer80, Inc.  
Filing party: Greenspoon Marder, LLP current counsel for Defendant, Polymer80, Inc.

Let me know if you need anything else.

**GreenspoonMarder**   
LLP  
CELEBRATING FORTY YEARS TOGETHER

**Melody Langley, Legal Assistant**  
**Greenspoon Marder, LLP**  
**200 East Broward Blvd, Suite 1800**  
**Fort Lauderdale, FL 33301**  
**Office Phone Number: 954-491-1120 ext. 1390**  
**Melody.Langley@gmlaw.com**

**www.gmlaw.com**

---

**From:** Shaddix, Trevor <Shaddit@saccourt.ca.gov>  
**Sent:** Monday, July 24, 2023 4:38 PM  
**To:** Richard Giller <Richard.Giller@gmlaw.com>  
**Cc:** Melody Langley <Melody.Langley@gmlaw.com>; Tereza Perez <Tereza.Perez@gmlaw.com>; James Duncan <James.Duncan@gmlaw.com>  
**Subject:** RE: MOTION HEARING REQUEST --RE: O'Sullivan v. Ghost Gunner, Inc. Case No. 34-2021-00302934-CU-PO-GDS

Hello,

These are the next available dates for department 27. 10/6/23, 10/13/23 & 10/20/23 at 9:00 a.m.  
Please respond with the following information.

Case Name:  
Case Number:  
Selected Date:  
Type of Motion:  
Filing party:

After you reply I will respond back with a reservation number.

Thanks,  
Trevor  
Dept 27

---

**From:** Richard Giller <Richard.Giller@gmlaw.com>  
**Sent:** Monday, July 24, 2023 10:21 AM  
**To:** Dept 27 <Dept27@saccourt.ca.gov>  
**Cc:** Melody Langley <Melody.Langley@gmlaw.com>; Tereza Perez <Tereza.Perez@gmlaw.com>; James Duncan <James.Duncan@gmlaw.com>  
**Subject:** RE: MOTION HEARING REQUEST --RE: O'Sullivan v. Ghost Gunner, Inc. Case No. 34-2021-00302934-CU-PO-GDS

<b>CAUTION:</b> This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.
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Dear Department 27 Clerk:

We have been trying to secure a hearing date for the past ten (10) days (including multiple telephone calls and emails) so that we can file an important motion to withdraw as counsel in the above-referenced case. That motion will also impact all currently scheduled discovery and hearing dates in this case, including the December 14, 2023 CMC. We would very much appreciate a response to this email providing us with a hearing date that works for both Judge Talley and Department 27.

Having been unsuccessful in securing a hearing date despite our multiple attempts, we attempted to pick a hearing date that provided sufficient notice to opposing counsel (August 17, 2023) on the pleadings, but that filing was rejected by the Clerk of the Court because "The motion must be reserved in Dept. 27...." As a result, we again respectfully request that Dept. 27 assign us a hearing date for our motion to withdraw as counsel so that we can resubmit the filing and move this process along as expeditiously as possible.

Thank you.  
Richard Giller



**Richard C. Giller**  
Chair, Insurance Recovery Group  
**GREENSPOON MARDER LLP**  
1875 Century Park East, Suite 1900  
Los Angeles, CA 90067  
(323) 880-4526 direct / (213) 359-1160 cell



**RECOGNIZED AMONG  
AMERICAN LAWYER  
WEST TRAILBLAZERS IN 2022**

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**From:** Melody Langley <[Melody.Langley@gmlaw.com](mailto:Melody.Langley@gmlaw.com)>  
**Sent:** Friday, July 21, 2023 12:35 PM  
**To:** [dept27@saccourt.ca.gov](mailto:dept27@saccourt.ca.gov)  
**Cc:** Tereza Perez <[Tereza.Perez@gmlaw.com](mailto:Tereza.Perez@gmlaw.com)>; James Duncan <[James.Duncan@gmlaw.com](mailto:James.Duncan@gmlaw.com)>; Richard Giller <[Richard.Giller@gmlaw.com](mailto:Richard.Giller@gmlaw.com)>  
**Subject:** MOTION HEARING REQUEST --RE: O'Sullivan v. Ghost Gunner, Inc. Case No. 34-2021-00302934-CU-PO-GDS  
**Importance:** High

Good afternoon,

Our office has been attempting to reserve a hearing date for a Motion to be Relieved as Counsel in the referenced matter for several days with no response. We attempted to file our Motion today but it was unfortunately rejected.

I hope someone can assist us soon and provide a hearing date.

Thank you in advance.



**Melody Langley, Legal Assistant**  
**Greenspoon Marder, LLP**  
200 East Broward Blvd, Suite 1800  
Fort Lauderdale, FL 33301  
Office Phone Number: 954-491-1120 ext. 1390  
[Melody.Langley@gmlaw.com](mailto:Melody.Langley@gmlaw.com)  
[www.gmlaw.com](http://www.gmlaw.com)

---

**From:** Melody Langley  
**Sent:** Tuesday, July 18, 2023 2:04 PM  
**To:** [dept27@saccourt.ca.gov](mailto:dept27@saccourt.ca.gov)  
**Cc:** Tereza Perez <[Tereza.Perez@gmlaw.com](mailto:Tereza.Perez@gmlaw.com)>; James Duncan <[James.Duncan@gmlaw.com](mailto:James.Duncan@gmlaw.com)>  
**Subject:** O'Sullivan v. Ghost Gunner, Inc. Case No. 34-2021-00302934-CU-PO-GDS

Good morning,

Our office represents Defendant Polymer80, Inc. in the referenced matter. We will be filing a Notice of Motion and Motion to Be Relieved as Counsel. We would like to request a hearing date for such motion.

Thank you.



**Melody Langley, Legal Assistant**  
**Greenspoon Marder, LLP**  
**200 East Broward Blvd, Suite 1800**  
**Fort Lauderdale, FL 33301**  
**Office Phone Number: 954-491-1120 ext. 1390**  
**Melody.Langley@gmlaw.com**  
**www.gmlaw.com**



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Unless specifically indicated otherwise, any discussion of tax issues contained in this e-mail, including any attachments, is not, and is not intended to be, "written advice" as defined in Section 10.37 of Treasury Department Circular 230.

A portion of our practice involves the collection of debt and any information you provide will be used for that purpose if we are attempting to collect a debt from you.