

1 Robert J. Nelson (State Bar No. 2999217)
2 Caitlin M. Nelson (State Bar No. 335601)
3 Lieff Cabraser Heimann & Bernstein, LLP
4 275 Battery Street, 29th Floor
5 San Francisco, CA 94111-3339
6 Telephone: 415.956.1000
7 Facsimile: 415.956.1008
8 rnelson@lchb.com
9 cwoods@lchb.com

10 *Attorneys for Plaintiffs*

Philip Bangle (admitted *pro hac vice*)
Brady: United Against Gun Violence
840 First Street, NE Suite 400
Washington, DC 20002
Telephone: 202-370-8100
Facsimile: 202-898-8100
pbangle@bradyunited.org

Attorneys for Plaintiffs

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

KELLEY and DENNIS O’SULLIVAN, in
their Individual Capacity and KELLY
O’SULLIVAN as Administrator of the
Estate of TARA O’SULLIVAN, Deceased,

Plaintiffs,

vs.

GHOST GUNNER INC., d/b/a
GHOSTGUNNER.NET, et al.,

Defendants.

Case No. 34-2021-00302934-CU-PO-GDS

*[Assigned to the Honorable Judge Jill H.
Talley; Dept. 25]*

**JOINT STIPULATION RE: CASE
SCHEDULE**

Plaintiffs and Defendants WM. C. Anderson, Inc., Juggernaut Tactical, Inc., Ghost
Firearms, LLC, Tactical Gear Heads, LLC and US Patriot Armory, by and through their
respective counsel of record, hereby stipulate as follows:

WHEREAS, on January 6, 2022, the parties attended the initial Case Management
Conference in this matter and advised the Court that certain critical evidence was inaccessible to
the parties because it is also evidence in a related criminal prosecution;

WHEREAS, the Court agreed that it is necessary for the parties to have access to this
evidence in order to make early determinations in this matter (including which Defendants, if any,
may be dismissed) and that a stay was appropriate until the evidence became available;

WHEREAS, on October 31, 2023, the Sacramento County District Attorney’s office

1 informed Plaintiffs' counsel that the related criminal prosecution is ongoing, with an intellectual
2 disability hearing set for January 2024 and a trial anticipated for April 2024 (if the defendant is
3 determined fit to stand trial);

4 WHEREAS, the next Case Management Conference in this matter has been set for
5 December 14, 2023;

6 WHEREAS, the parties will have more information about the status of the related criminal
7 prosecution after the January 2024 intellectual disability hearing;

8 THEREFORE, the undersigned parties jointly request to stay this action until February 1,
9 2024.

10 IT IS SO STIPULATED.

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13 Dated: November 6, 2023

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

/s/ Robert J. Nelson

Robert J. Nelson

Attorneys for Plaintiffs

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17 Dated: November 6, 2023

RENZULLI LAW FIRM, LLP

/s/ Howard Schilsky

Howard Schilsky

*Attorneys for Defendant, JUGGERNAUT
TACTICAL, INC. d/b/a JTACTICAL.COM*

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21
22 Dated: November 6, 2023

**KOELLER NEBEKER, CARLSON &
HALUCK, LLP**

/s/ Brian M. Sanders

Brian M. Sanders

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

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Dated: November 6, 2023

POTER SCOTT LAW FIRM

/s/ Ryan Erdreich
Ryan Erdreich
Attorneys for Defendants, JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM

Dated: November 6, 2023

JACOBSEN & MCELROY PC

/s/ David H. Pollock
David H. Pollock
Attorneys for Defendant GHOST FIREARMS LLC, d/b/a GRID DEFENSE and GHOSTRIFLES.COM

Dated: November 6, 2023

LIVINGSTON LAW FIRM

/s/ Crystal Van Der Putten
Crystal Van Der Putten
Attorneys for Defendants TACTICAL GEAR HEADS LLC, d/b/a 80-LOWER.COM; AR-15LOWERRECEIVERS.COM and 80LOWERJIG.COM

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PROPOSED ORDER

Pursuant to the signing parties' stipulation and for good cause shown, it is hereby
ORDERED that:

This matter is stayed until February 1, 2024.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Jill H. Talley
Judge of the Superior Court

1 **PROOF OF SERVICE**

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3 I am a citizen of the United States and a resident of the County of Alameda, State of
4 California. I am over the age of 18 years and not a party to the within action. My business
5 mailing address is 275 Battery St, 29th Floor, San Francisco, California 94111. I am familiar with
6 this firm's practice whereby the mail, after being placed in a designated area, is given the
7 appropriate postage and is deposited in a U.S. mailbox after the close of the day's business.

8 XX On the date indicated below, I served the document(s) designated below on all parties
9 in said action by placing a true copy thereof in a sealed envelope in the designated area for
10 out-going mail addressed as set forth below:

11 ___ On the date indicated below, I served the document(s) designated below on all parties
12 in said action by placing a true copy thereof in a sealed envelope and mailed it via
13 overnight mail with Federal Express addressed as set forth below:

14 XX On the date indicated below, I personally served the document(s) designated below by
15 transmitting a true copy thereof via electronic mail in .pdf format as an e-mail attachment
16 to each addressee set forth below:

17 ___ On the date indicated below, I served the document(s) designated below by
18 transmitting a true copy thereof via Fax to the person(s) and at the Fax number(s) set forth
19 below:

20 **JOINT STIPULATION RE: CASE SCHEDULE**

21 David A. Melton 22 Kristin Du 23 Poter Scott Law Firm 24 350 University Ave, Suite 200 25 Sacramento, CA 26 Email: dmelton@porterscott.com 27 kdu@porterscott.com 28 Telephone: 916.929.1481 Facsimile : 916.927.3706	Sean A. Brady Michel & Associates, P.C. Attorneys at Law 180 East Ocean Boulevard, Suite 200 Long Beach, CA 90802 Email: sbrady@michellawyers.com Telephone: 562-216-4444 Facsimile : 562-216-4445 <i>Attorneys for Defendants, RYAN BEEZLEY AND BOB BEEZLEY d/b/a RBTACTICALTOOLING.COM, THUNDER GUNS LLC, d/b/a THUNDERTACTICAL.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</i>
--	--

1	rerdreich@pisciotti.com	<i>TECHNICAL SOLUTIONS LLC, d/b/a</i>
2	<i>Attorneys for Defendants, JAMES TROMBLEE,</i>	<i>5DTACTICAL.COM, JSD SUPPLY, d/b/a</i>
3	<i>JR., d/b/a USPATRIOTARMORY.COM</i>	<i>JSDSUPPLY.COM and</i>
4	(VIA EMAIL ONLY)	<i>80PERCENTGUYS.COM</i>
5	Howard Schilsky	Brian M. Sanders
6	Christopher Renzulli	Mitchell R. Vanlandingham
7	Renzulli Law Firm, LLP	Koeller Nebeker, Carlson & Haluck, LLP
8	One N. Broadway, Suite 1005	1478 Stone Point Dr, Suite 435
9	White Plains, NY 10601	Roseville, CA 95661
10	Email: hschilsky@renzullilaw.com	Telephone ((916) 724-5700
11	Telephone: 914-285-0700	Facsimile: (916) 788-2850
12	Facsimile : 914-285-1213	Email: brian.sanders@knchlaw.com
13	Richard Linkert	Mitchell.vanlandingham@knchlaw.com
14	Madison Simmons	<i>Attorneys for Defendant WM. C.</i>
15	Matheny Sears Linkert & Jaime LLP	<i>ANDERSON, INC., d/b/a</i>
16	3638 American River Drive	<i>ANDERSONMANUFACTURING.COM</i>
17	Sacramento, CA 95864-4711	(VIA EMAIL ONLY)
18	rlinkert@mathenysears.com	
19	msimmons@mathenysears.com	
20	<i>Attorneys for Defendant, JUGGERNAUT</i>	
21	<i>TACTICAL, INC. d/b/a JTACTICAL.COM</i>	
22	(VIA EMAIL ONLY)	
23	David H. Pollock	Tina M. Robinson
24	Jacobsen & McElroy PC	Pettit Kohn Ingrassia Lutz & Dolin PC
25	2401 American River Drive, Suite 100	5901 W. Century Blvd., Suite 1100
26	Sacramento, CA 95825	Los Angeles, CA 90045
27	Email: dpollock@jacobsenmcelroy.com	Email: trobinson@pettitkohn.com
28	Telephone: (916) 971-4100 Ext. 231	Telephone: (310) 649-5772
	Facsimile: (916) 971-4150	Facsimile: (310) 649-5777
	<i>Attorneys for Defendant GHOST FIREARMS</i>	<i>Attorneys for Defendant GHOST GUNNER</i>
	<i>LLC, d/b/a GRID DEFENSE and</i>	<i>INC., d/b/a GHOSTGUNNER.NET,</i>
	<i>GHOSTRIFLES.COM</i>	<i>(DEFENSE DISTRIBUTED)</i>
	(VIA EMAIL ONLY)	(VIA EMAIL ONLY)
	Craig Livingston	M-16 PARTS SUPPLY LLC, d/b/a M-
	Crystal Van Der Putten	16PARTS.COM
	Livingston Law Firm	c/0 Terry J. Weisflog
	1600 South Main Street, Suite 280	5918 England Avenue
	Walnut Creek, CA 94596	Orlando, FL 32808
	Email: clivingston@livingstonlawyers.com	(VIA REGULAR MAIL ONLY)
	cvanderputten@livingstonlawyers.com	
	Telephone: (925) 952-9880	
	Facsimile: (925) 952-9881	
	<i>Attorneys for Defendants TACTICAL GEAR</i>	

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<p><i>HEADS LLC, d/b/a 80-LOWER.COM; AR-15LOWERRECEIVERS.COM and 80LOWERJIG.COM</i></p> <p>(VIA EMAIL 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>	<p>Defendant POLYMER80, INC., d/b/a POLYMER80.COM and P80 TACTICAL 134 Lakes Blvd. Dayton, NV 89403</p> <p>(VIA REGULAR MAIL ONLY)</p>

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed November 6, 2023, at Oakland, California.

/s/ Caitlin M. Nelson
CAITLIN M. NELSON