

By Fax

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**FILED**  
Superior Court of California  
County of Sacramento  
12/11/2023  
T. Shaddix, Deputy

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

2879608.1

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JOINT STIPULATION RE: CASE SCHEDULE



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

14  
15  
16  
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

18  
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20  
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

1 Dated: November 6, 2023

**POTER SCOTT LAW FIRM**

2  
3 /s/ Ryan Erdreich

4 Ryan Erdreich

5 *Attorneys for Defendants, JAMES TROMBLEE,*  
6 *JR., d/b/a USPATRIOTARMORY.COM*

7 Dated: November 6, 2023

**JACOBSEN & MCELROY PC**

8 /s/ David H. Pollock

9 David H. Pollock

10 *Attorneys for Defendant GHOST FIREARMS*  
11 *LLC, d/b/a GRID DEFENSE and*  
12 *GHOSTRIFLES.COM*

13 Dated: November 6, 2023

**LIVINGSTON LAW FIRM**

14 /s/ Crystal Van Der Putten

15 Crystal Van Der Putten

16 *Attorneys for Defendants TACTICAL GEAR*  
17 *HEADS LLC, d/b/a 80-LOWER.COM; AR-*  
18 *15LOWERRECEIVERS.COM and*  
19 *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. ~~V@/Oæ^T æ æ^ { ^} dO[ } ^!^} &^A^A! iÁ~~  
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**IT IS SO ORDERED.**

Dated: 12/11/2023

*Jill Talley*

Honorable Judge Jill H. Talley  
Judge of the Superior Court



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**PROOF OF SERVICE**

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

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

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

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

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

**JOINT STIPULATION RE: CASE SCHEDULE**

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THUNDERTACTICAL.COM, and  
BLACKHAWK MANUFACTURING  
GROUP INC., d/b/a  
80PERCENTARMS.COM, MATRIX ARMS,  
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	<i>GHOSTRIFLES.COM</i>	<i>(DEFENSE DISTRIBUTED)</i>
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9 I declare under penalty of perjury, under the laws of the State of California, that the  
10 foregoing is true and correct. Executed November 6, 2023, at Oakland, California.  
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12 /s/ Caitlin M. Nelson  
13 CAITLIN M. NELSON  
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