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Attorneys for Plaintiffs

Attorneys for Plaintiffs

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. 23]

**JOINT STIPULATION RE: CASE
SCHEDULE**

Plaintiffs and Defendants Ryan and Bob Beezley, Thunder Guns LLC, Matrix Arms,
Blackhawk Manufacturing Group Inc., James Madison Tactical Inc., JSD Supply, MFY
Technical Solutions LLC, Juggernaut Tactical Inc., US Patriot Armory, Tactical Gear Heads
LLC, Ghost Firearms LLC, Anderson Manufacturing, and Ghost Gunner Inc., 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,

1 may be dismissed) and that a stay was appropriate until the evidence became available;

2 WHEREAS, on April 22, 2024, Plaintiffs' counsel confirmed with the Sacramento County
3 District Attorney's office that the intellectual disability trial of the defendant in the related
4 criminal matter is set to begin on April 29, 2024, and is expected to last for two weeks and be
5 ruled on in early-mid May 2024;

6 WHEREAS, the parties agree it would be most efficient to give the parties time to learn
7 the results of the intellectual disability trial, and—if the prosecution is unsuccessful and the
8 defendant is deemed unfit to stand trial—to discuss with the DA's office when and how the
9 parties in this matter can access the relevant evidence;

10 THEREFORE, the parties jointly request to postpone the May 24, 2024 case management
11 conference and stay this action until June 21, 2024.

12 IT IS SO STIPULATED.

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15 Dated: April 30, 2024

**LIEFF CABRASER HEIMANN &
BERNSTEIN**

/s/ Robert J. Nelson

Robert J. Nelson
Attorneys for Plaintiffs

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18
19 Dated: April 30, 2024

RENZULLI LAW FIRM

/s/ Howard Schilsky

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

20
21
22
23
24 Dated: April 30, 2024

**KOELLER, NEBEKER, CARLSON &
HALUCK**

/s/ Brian M. Sanders

Brian M. Sanders
Attorneys for Defendant WM. C. ANDERSON,
INC., d/b/a
ANDERSONMANUFACTURING.COM

1
2
3
4 Dated: April 30, 2024

MICHEL & ASSOCIATES

5 /s/ Sean Brady

6 Sean Brady

7 *Attorneys for Defendants Ryan Beezley and Bob*
8 *Beezley, Thunder Guns, LLC, Matrix Arms,*
9 *Blackhawk Manufacturing Group, Inc., James*
10 *Madison Tactical, Inc., JSD Supply, and MFY*
11 *Technical Solutions, LLC*

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13
14
15
16 Dated: April 30, 2024

JACOBSEN & MCELROY

17 /s/ David H. Pollock

18 David H. Pollock

19 *Attorneys for Defendant GHOST FIREARMS*
20 *LLC, d/b/a GRID DEFENSE and*
21 *GHOSTRIFLES.COM*

22
23
24 Dated: April 30, 2024

LIVINGSTON LAW FIRM

25 /s/ Crystal Van Der Putten

26 Crystal Van Der Putten

27 *Attorneys for Defendants TACTICAL GEAR*
28 *HEADS LLC, d/b/a 80-LOWER.COM; AR-*
15LOWERRECEIVERS.COM and
80LOWERJIG.COM

Dated: April 30, 2024

DILLON LAW GROUP

/s/ John Dillon

John Dillon

Attorneys for Defendant Ghost Gunner, Inc.
(Defense Distributed)

1 Dated: April 30, 2024

PISCIOTTI LALLIS ERDREICH

2
3 /s/ Ryan Erdreich

4 Ryan Erdreich

5 Attorneys for Defendant JAMES TROMBLEE,
6 JR., d/b/a USPATRIOTARMORY.COM
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PROPOSED ORDER

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

The case management conference set for May 24, 2024 is postponed. This matter is stayed
until June 21, 2024.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Jill H. Talley
Judge of the Superior Court

2989065.1

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, 29th 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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*Attorneys for Defendant WM. C.
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| <p> David A. Melton Kristin Du Potter Scott Law Firm 350 University Ave, Suite 200 Sacramento, CA Email: dmelton@porterscott.com kdu@porterscott.com Telephone: 916.929.1481 Facsimile : 916.927.3706 Anthony M. Pisciotto Danny Lallis Ryan Erdreich Pisciotto Lallis Erdreich, P.C. 30 Columbia Turnpike, Suite 205 Florham Park, NJ 07932 TEL: (973)245-8100 Email: apisciotto@pisciotto.com dlallis@pisciotto.com rerdreich@pisciotto.com Attorneys for Defendants JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM (VIA EMAIL ONLY) </p> | <p> 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 Attorneys for Defendants, RYAN BEEZLEY AND BOB BEEZLEY d/b/a RBACTICIALTOOLING.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 TECHNICAL SOLUTIONS LLC, d/b/a 5DTACTICAL.COM, JSD SUPPLY, d/b/a JSDSUPPLY.COM and 80PERCENTGUYS.COM (VIA EMAIL ONLY) </p> |
| <p> John W. Dillon Dillon Lawn Group APC 2647 Gateway Rd Suite 105, No. 255 Carlsbad, CA 92009 Email: jdillon@dillonlawgp.com Telephone: (760) 642-7150 Attorneys for Defendant GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET, (DEFENSE DISTRIBUTED) (VIA EMAIL ONLY) </p> | <p> M-16 PARTS SUPPLY LLC, d/b/a M- 16PARTS.COM c/o Terry J. Weisflog 5918 England Avenue Orlando, FL 32808 (VIA REGULAR MAIL ONLY) </p> |

(VIA REGULAR MAIL ONLY)

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CAITLIN M. NELSON