

Law Offices of
MATHENY SEARS LINKERT & JAIME LLP
RICHARD S. LINKERT, ESQ. (SBN 88756)
MADISON M. SIMMONS, ESQ. (SBN 292185)
3638 American River Drive
Sacramento, California 95864
Telephone: (916) 978-3434
Facsimile: (916) 978-3430
Email: mlinkert@mathenysears.com
msimmons@mathenysears.com

Attorneys for Defendant, JUGGERNAUT TACTICAL, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

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

Plaintiffs,

v.

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

Defendants.

Case No. 34-2021-00302934

NOTICE OF UNAVAILABILITY

ACTION FILED: June 17, 2021

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that counsel Defendant, JUGGERNAUT TACTICAL, INC. is not available for any purpose, including ex parte and statutory notice of any kind, from May 3, 2024 through May 31, 2024. I will be preparing for trial and will be in trial in San Francisco County beginning May 13, 2024. I will notify all Counsel if my trial is continued or at the conclusion of trial.

Per *Tenderloin Housing Clinic v. Sparks* (1992) 8 Cal.App.4th 299, notice is hereby given to the parties and their attorneys of record that intentionally scheduling a conflicting proceeding without good cause may result in sanctions against the scheduling party.

Dated: May 1, 2024

MATHENY SEARS LINKERT & JAIME LLP

By: 

RICHARD S. LINKERT, ESQ.
MADISON M. SIMMONS, ESQ.
Attorneys for Defendant, JUGGERNAUT
TACTICAL,

O'Sullivan v. Ghost Gunner Inc., et al.

Sacramento County Superior Court – Case No. 34-2021-00302934

PROOF OF SERVICE

(CCP sections 1010.6, 1011, 1013, & 2015)

I am over the age of eighteen years and not a party to the within-entitled action. My business address is 3638 American River Drive, Sacramento, CA 95864. On this date, I served:

NOTICE OF UNAVAILABILITY

[X] **BY ELECTRONIC MAIL:** By sending the attached document(s) to be sent from email address slehmann@mathenysears.com to the persons at the e-mail address(es) set forth below. This electronic service is sent to the email address(es) in compliance with CCP 1010.6 (2)(A)(ii) and 1010.6(e)(1).:

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury, according to the laws of the State of California, that the foregoing is true and correct. Executed on May 1, 2024, at Sacramento, California.



Samantha Lehmann

SERVICE LIST

<u>Counsel for PLAINTIFFS:</u> Robert J. Nelson, Esq. Caitlin M. Nelson, Esq. LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339 Ph: (415) 956-1000 Fax: (415) 956-1008 rnelson@lchb.com cnelson@lchb.com	<u>Counsel for PLAINTIFFS:</u> Jonathan Lowy, Esq. Christa Nicols, Esq. BRADY: UNITED AGAINST GUN VIOLENCE 840 First Street, NE Suite 400 Washington, DC 20002 Ph: (202) 370-8100 Fax: (202) 898-8100 jlowy@bradyunited.org cnicols@bradyunited.org
<u>Counsel for Defendant JAMES TROMBLEE, JR., dba USPATRIOTARMORY.COM:</u> Anthony M. Piscioti, Esq. Ryan L. Erdreich, Esq. Danny C. Lallis, Esq. PISCIOTTI LALLIS ERDREICH, P.C. 30 Columbia Turnpike, Suite 205 Florham Park, NJ 07932 Ph: (973) 245-8100 Fax: (973) 245-8101 rerdreich@pisciotti.com apisciotti@pisciotti.com dlallis@pisciotti.com	<u>Counsel for Defendant JAMES TROMBLEE, JR., dba USPATRIOTARMORY.COM:</u> David A. Melton, Esq. MaryJo E. Smart, Esq. PORTER SCOTT 350 University Ave, Ste 200 Sacramento, CA 95825-6581 Ph: 916-929-1481 Fax: 916-927-3706 dmelton@porterscott.com msmart@porterscott.com mflores@porterscott.com
<u>Counsel for Defendants RYAN BEEZLEY and BOB BEEZLEY; THUNDER GUNS, LLC; GHOST FIREARMS, LLC; MATRIX ARMS; BLACKHAWK MANUFACTURING GROUP, INC.; JAMES MADISON TACTICAL, INC.; JSD SUPPLY; and MFY TECHNICAL SOLUTIONS, LLC:</u> Sean A. Brady, Esq. MICHAEL & ASSOCIATES, P.C. 180 E. Ocean Boulevard, Suite 200 Long Beach, CA 90802 Ph: (562) 216-4444 Fax: (562) 216-4445 sbrady@michellawyers.com lpalmerin@michellawyers.com	<u>Counsel for Defendant POLYMER80, INC.</u> Germain D. Labat, Esq. GREENSPOON MARDER LLP 1875 Century Park East, Suite 1900 Los Angeles, CA 90067 Ph: (323) 880-4520 germain.labat@gmlaw.com

Counsel for POLYMER 80, INC.

Germain D. Labat, Esq.
Guinevere Malley, Esq.
GREENSPOON MARDER LLP
1875 Century Park East, Suite 1900
Los Angeles, CA 90067
Germain.labat@gmlaw.com
Guinevere.malley@gmlaw.com

**Counsel for Defendant DEFENSE
DISTRIBUTED (erroneously sued as
"GHOST GUNNER INC., dba
GHOSTGUNNER.NET")**

Grant D. Waterkotte, Esq.
Tina M. Robinson, Esq.
PETTIT KOHN INGRASSIA LUTZ &
DOLIN PC
5901 W. Century Blvd., Ste1100
Los Angeles, CA 90045
Ph: (310) 649-5772
Fax: (310) 649-5777
gwaterkotte@pettitkohn.com
trobinson@pettitkohn.com

**Counsel for Defendant JUGGERNAUT
TACTICAL, INC.**

Christopher Renzulli, Esq.
Howard B. Schilsky, Esq.
RENZULLI LAW FIRM, LLP
One North Broadway, Suite 1005
White Plains, NY 10601
Fax: (914) 285-1213
crenzulli@renzullilaw.com
hschilsky@renzullilaw.com
gdigiovanni@renzullilaw.com