

By Fax

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

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

FILED
Superior Court of California
County of Sacramento
05/13/2024
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. 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.
13
14

15 Dated: April 30, 2024

**LIEFF CABRASER HEIMANN &
BERNSTEIN**

/s/ Robert J. Nelson

Robert J. Nelson

Attorneys for Plaintiffs

19 Dated: April 30, 2024

RENZULLI LAW FIRM

/s/ Howard Schilsky

Howard Schilsky

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

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*

12
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 Dated: April 30, 2024

LIVINGSTON LAW FIRM

24 /s/ Crystal Van Der Putten

25 Crystal Van Der Putten

26 *Attorneys for Defendants TACTICAL GEAR*
27 *HEADS LLC, d/b/a 80-LOWER.COM; AR-*
28 *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
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

that:

078æ^Á æ æ^ { ^} 08} -1^} &^ Á^ Á^ |Á^ } ^ Á^ ÑG Áæ^ ÉKÉæ Ñ Á^ Á^ æd ^} c

Honorable Judge Jill H. Talley
Judge of the Superior Court

-5-

1 **PROOF OF SERVICE**

2
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
appropriate postage and is deposited in a U.S. mailbox after the close of the day's business.

7 XX On the date indicated below, I served the document(s) designated below on all parties
8 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:

9 On the date indicated below, I served the document(s) designated below on all parties
10 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:

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

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

16 **JOINT STIPULATION RE: CASE SCHEDULE**

17 Howard Schilsky
18 Christopher Renzulli
19 Renzulli Law Firm, LLP
20 One N. Broadway, Suite 1005
White Plains, NY 10601
Email: hschilsky@renzullilaw.com
Telephone: 914-285-0700
Facsimile : 914-285-1213

21 Richard Linkert

22 Madison Simmons
23 Matheny Sears Linkert & Jaime LLP
3638 American River Drive
Sacramento, CA 95864-4711
24 rlinkert@mathenysears.com
msimmons@mathenysears.com

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

27 (VIA EMAIL ONLY)
28

Brian M. Sanders
Lisa Corman
Koeller Nebeker, Carlson & Haluck, LLP
1478 Stone Point Dr, Suite 435
Roseville, CA 95661
Telephone ((916) 724-5700
Facsimile: (916) 788-2850
Email: brian.sanders@knchlaw.com
Lisa.corman@knchlaw.com

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

(VIA EMAIL ONLY)

1	Craig Livingston Crystal Van Der Putten Livingston Law Firm 1600 South Main Street, Suite 280 Walnut Creek, CA 94596 Email: clivingston@livingstonlawyers.com cvanderputten@livingstonlawyers.com Telephone: (925) 952-9880 Facsimile: (925) 952-9881	David H. Pollock Jacobsen & McElroy PC 2401 American River Drive, Suite 100 Sacramento, CA 95825 Email: dpollock@jacobsenmcelroy.com Telephone: (916) 971-4100 Ext. 231 Facsimile: (916) 971-4150
6	<i>Attorneys for Defendants TACTICAL GEAR HEADS LLC, d/b/a 80-LOWER.COM; AR- 15LOWERRECEIVERS.COM and 80LOWERJIG.COM</i>	<i>Attorneys for Defendant GHOST FIREARMS LLC, d/b/a GRID DEFENSE and GHOSTRIFLES.COM</i>
8	(VIA EMAIL ONLY)	(VIA EMAIL ONLY)
10	David A. Melton Kristin Du Poter 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	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
15	Anthony M. Pisciotti Danny Lallis Ryan Erdreich Pisciotti Lallis Erdreich, P.C. 30 Columbia Turnpike, Suite 205 Florham Park, NJ 07932 TEL: (973)245-8100 Email: apisciotti@pisciotti.com dlallis@pisciotti.com rerdreich@pisciotti.com	<i>Attorneys for Defendants, RYAN BEEZLEY AND BOB BEEZLEY d/b/a RBTACTICIALTOOLING.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</i>
20	<i>Attorneys for Defendants JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM</i>	
22	(VIA EMAIL ONLY)	(VIA EMAIL ONLY)
23	John W. Dillon Dillon Lawn Group APC 2647 Gateway Rd Suite 105, No. 255 Carlsbad, CA 92009 Email: jdillon@dillonlawgpp.com Telephone: (760) 642-7150	M-16 PARTS SUPPLY LLC, d/b/a M- 16PARTS.COM c/o Terry J. Weisflog 5918 England Avenue Orlando, FL 32808
26	<i>Attorneys for Defendant GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET, (DEFENSE DISTRIBUTED)</i>	(VIA REGULAR MAIL ONLY)
28	(VIA EMAIL ONLY)	

1 INDUSTRY ARMAMENT INC., d/b/a
2 AMERICANWEAPONSCOMPONENTS.COM
3 CT Corp Trust Co
4 1209 N Orange Street
5 Wilmington, DE 19801-1120

6 (VIA REGULAR MAIL ONLY)

Defendant POLYMER80, INC., d/b/a
POLYMER80.COM and P80 TACTICAL
134 Lakes Blvd.
Dayton, NV 89403

(VIA REGULAR MAIL ONLY)

7 I declare under penalty of perjury, under the laws of the State of California, that the
8 foregoing is true and correct. Executed April 30, 2024, at Oakland, California.

9 /s/ Caitlin M. Nelson
10 CAITLIN M. NELSON
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28