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Attorneys for Plaintiffs

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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 May 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 began on April 29, with closing briefs due on June 7, replies due on June 14, and
5 an anticipated decision by June 28;

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 June 21, 2024 case management
11 conference to July 19, 2024, with a joint case management conference statement due on July 8,
12 2024.

13 IT IS SO STIPULATED.

14
15 Dated: May 29, 2024

**LIEFF CABRASER HEIMANN &
BERNSTEIN**

/s/ Robert J. Nelson

Robert J. Nelson
Attorneys for Plaintiffs

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19 Dated: May 29, 2024

RENZULLI LAW FIRM

/s/ Howard Schilsky

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

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21
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23
24 Dated: May 29, 2024

**KOELLER, NEBEKER, CARLSON &
HALUCK**

/s/ Brian M. Sanders

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

Dated: May 29, 2024

MICHEL & ASSOCIATES

/s/ Sean Brady

Sean Brady

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

Dated: May 29, 2024

JACOBSEN & MCELROY

/s/ David H. Pollock

David H. Pollock

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

Dated: May 29, 2024

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

Dated: May 29, 2024

DILLON LAW GROUP

/s/ John Dillon

John Dillon

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

Dated: May 29, 2024

PISCIOTTI LALLIS ERDREICH

/s/ Ryan Erdreich

Ryan Erdreich

Attorneys for Defendant JAMES TROMBLEE, 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 June 21, 2024 is postponed to July 19, 2024. The
parties’ joint case management conference statement is due on July 8, 2024.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Jill H. Talley
Judge of the Superior Court