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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 August 30, 2024, the defendant in the related criminal matter changed his
3 plea to guilty. Jury selection for the penalty phase of the case has begun, with questioning set for
4 October 8, presentation set for October 16, and a conclusion anticipated by mid-November;

5 WHEREAS, the parties agree it would be most efficient to give the parties time to learn
6 the results of the penalty trial and to discuss with the DA's office when and how the parties in this
7 matter can access the relevant evidence;

8 THEREFORE, the parties jointly request to postpone the November 15, 2024 case
9 management conference until December 13, 2024, with a joint case management statement due
10 on November 27, 2024.

11 IT IS SO STIPULATED.

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14 Dated: September 23, 2024

**LIEFF CABRASER HEIMANN &
BERNSTEIN**

/s/ Robert J. Nelson

Robert J. Nelson

Attorneys for Plaintiffs

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18 Dated: September 23, 2024

RENZULLI LAW FIRM

/s/ Howard Schilsky

Howard Schilsky

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

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23 Dated: September 23, 2024

**KOELLER, NEBEKER, CARLSON &
HALUCK**

/s/ Brian M. Sanders

Brian M. Sanders

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

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3 Dated: September 23, 2024

MICHEL & ASSOCIATES

4 /s/ Sean Brady

5 Sean Brady

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

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13 Dated: September 23, 2024

JACOBSEN & MCELROY

14 /s/ David H. Pollock

15 David H. Pollock

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

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21 Dated: September 23, 2024

LIVINGSTON LAW FIRM

22 /s/ Crystal Van Der Putten

23 Crystal Van Der Putten

24 *Attorneys for Defendants TACTICAL GEAR*
25 *HEADS LLC, d/b/a 80-LOWER.COM; AR-*
26 *15LOWERRECEIVERS.COM and*
27 *80LOWERJIG.COM*

28 Dated: September 23, 2024

DILLON LAW GROUP

/s/ John Dillon

John Dillon

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

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Dated: September 23, 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 November 15, 2024 is postponed to December 13, 2024. The parties’ joint case management conference statement is due on November 27, 2024.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Jill H. Talley
Judge of the Superior Court

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