

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Robert J. Nelson (State Bar No. 132797) Lief Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor. San Francisco, CA 94111-3339 TELEPHONE NO.: 415.956.1000 FAX NO. (Optional): 415.956.1008 E-MAIL ADDRESS (Optional): rnelson@lchb.com ATTORNEY FOR (Name): Kelley and Denis O'Sullivan	<b>FOR COURT USE ONLY</b>
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento</b> STREET ADDRESS: 720 9th Street, Room 101 MAILING ADDRESS: 720 9th Street CITY AND ZIP CODE: Sacramento, CA 95814 BRANCH NAME: Gordon D. Schaber Courthouse	
PLAINTIFF/PETITIONER: Kelley and Denis O'Sullivan DEFENDANT/RESPONDENT: Ghost Gunner, Inc., et al.	
<b>CASE MANAGEMENT STATEMENT</b> (Check one): <input checked="" type="checkbox"/> <b>UNLIMITED CASE</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>LIMITED CASE</b> (Amount demanded is \$25,000 or less)	CASE NUMBER: 34-2021-00302934
A <b>CASE MANAGEMENT CONFERENCE</b> is scheduled as follows: Date: 05/24/2024 Time: 10:30 AM Dept.: 23 Div.: Room: Address of court (if different from the address above): <input checked="" type="checkbox"/> <b>Notice of Intent to Appear by Telephone, by (name):</b> Robert J. Nelson; Caitlin M. Nelson	

**INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.**

1. **Party or parties** (answer one):
  - a.  This statement is submitted by party (name):
  - b.  This statement is submitted **jointly** by parties (names): See attachment 1(b)
  
2. **Complaint and cross-complaint** (to be answered by plaintiffs and cross-complainants only)
  - a. The complaint was filed on (date): June 17, 2021
  - b.  The cross-complaint, if any, was filed on (date):
  
3. **Service** (to be answered by plaintiffs and cross-complainants only)
  - a.  All parties named in the complaint and cross-complaint have been served, have appeared, or have been dismissed.
  - b.  The following parties named in the complaint or cross-complaint
    - (1)  have not been served (specify names and explain why not):
    - (2)  have been served but have not appeared and have not been dismissed (specify names):  
See attachment 3(b)(2)
    - (3)  have had a default entered against them (specify names):
  - c.  The following additional parties may be added (specify names, nature of involvement in case, and date by which they may be served):
  
4. **Description of case**
  - a. Type of case in  complaint  cross-complaint (Describe, including causes of action):  
 Personal injury case alleging: (1) negligence; (2) negligence per se; (3) negligent entrustment; (4) public nuisance; (5) violation of Bus. & Prof. Code § 17200 et seq. Defendants named via market share liability theory.

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4. b. Provide a brief statement of the case, including any damages. *(If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)*  
See attachment 4(b)

*(If more space is needed, check this box and attach a page designated as Attachment 4b.)*

5. **Jury or nonjury trial**

The party or parties request  a jury trial  a nonjury trial. *(If more than one party, provide the name of each party requesting a jury trial):*

6. **Trial date**

- a.  The trial has been set for *(date)*:  
b.  No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint *(if not, explain)*:  
Related criminal prosecution may conclude in May 2024. Critical discovery cannot occur until that time.  
c. Dates on which parties or attorneys will not be available for trial *(specify dates and explain reasons for unavailability)*:

7. **Estimated length of trial**

The party or parties estimate that the trial will take *(check one)*:

- a.  days *(specify number)*: 10  
b.  hours (short causes) *(specify)*:

8. **Trial representation** *(to be answered for each party)*

The party or parties will be represented at trial  by the attorney or party listed in the caption  by the following:

- a. Attorney:  
b. Firm:  
c. Address:  
d. Telephone number:  
e. E-mail address:  
f. Fax number:  
g. Party represented:

Additional representation is described in Attachment 8.

9. **Preference**

This case is entitled to preference *(specify code section)*:

10. **Alternative dispute resolution (ADR)**

- a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the court under rule 3.221 for information about the processes available through the court and community programs in this case.
- (1) For parties represented by counsel: Counsel  has  has not provided the ADR information package identified in rule 3.221 to the client and reviewed ADR options with the client.
- (2) For self-represented parties: Party  has  has not reviewed the ADR information package identified in rule 3.221.
- b. **Referral to judicial arbitration or civil action mediation** (if available).
- (1)  This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.
- (2)  Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.
- (3)  This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. *(specify exemption)*:

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10. c. Indicate the ADR process or processes that the party or parties are willing to participate in, have agreed to participate in, or have already participated in (*check all that apply and provide the specified information*):

	The party or parties completing this form <b>are willing</b> to participate in the following ADR processes ( <i>check all that apply</i> ):	If the party or parties completing this form in the case <b>have agreed</b> to participate in or have already completed an ADR process or processes, indicate the status of the processes ( <i>attach a copy of the parties' ADR stipulation</i> ):
(1) Mediation	<input type="checkbox"/>	<input type="checkbox"/> Mediation session not yet scheduled <input type="checkbox"/> Mediation session scheduled for ( <i>date</i> ): <input type="checkbox"/> Agreed to complete mediation by ( <i>date</i> ): <input type="checkbox"/> Mediation completed on ( <i>date</i> ):
(2) Settlement conference	<input type="checkbox"/>	<input type="checkbox"/> Settlement conference not yet scheduled <input type="checkbox"/> Settlement conference scheduled for ( <i>date</i> ): <input type="checkbox"/> Agreed to complete settlement conference by ( <i>date</i> ): <input type="checkbox"/> Settlement conference completed on ( <i>date</i> ):
(3) Neutral evaluation	<input type="checkbox"/>	<input type="checkbox"/> Neutral evaluation not yet scheduled <input type="checkbox"/> Neutral evaluation scheduled for ( <i>date</i> ): <input type="checkbox"/> Agreed to complete neutral evaluation by ( <i>date</i> ): <input type="checkbox"/> Neutral evaluation completed on ( <i>date</i> ):
(4) Nonbinding judicial arbitration	<input type="checkbox"/>	<input type="checkbox"/> Judicial arbitration not yet scheduled <input type="checkbox"/> Judicial arbitration scheduled for ( <i>date</i> ): <input type="checkbox"/> Agreed to complete judicial arbitration by ( <i>date</i> ): <input type="checkbox"/> Judicial arbitration completed on ( <i>date</i> ):
(5) Binding private arbitration	<input type="checkbox"/>	<input type="checkbox"/> Private arbitration not yet scheduled <input type="checkbox"/> Private arbitration scheduled for ( <i>date</i> ): <input type="checkbox"/> Agreed to complete private arbitration by ( <i>date</i> ): <input type="checkbox"/> Private arbitration completed on ( <i>date</i> ):
(6) Other ( <i>specify</i> ):	<input type="checkbox"/>	<input type="checkbox"/> ADR session not yet scheduled <input type="checkbox"/> ADR session scheduled for ( <i>date</i> ): <input type="checkbox"/> Agreed to complete ADR session by ( <i>date</i> ): <input type="checkbox"/> ADR completed on ( <i>date</i> ):

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**11. Insurance**

- a.  Insurance carrier, if any, for party filing this statement (*name*):
- b. Reservation of rights:  Yes  No
- c.  Coverage issues will significantly affect resolution of this case (*explain*):

**12. Jurisdiction**

Indicate any matters that may affect the court's jurisdiction or processing of this case and describe the status.

- Bankruptcy  Other (*specify*):

Status:

**13. Related cases, consolidation, and coordination**

- a.  There are companion, underlying, or related cases.
  - (1) Name of case: California v. Adel Sambrano Ramos
  - (2) Name of court: Sacramento Superior Court
  - (3) Case number: 19FE011057
  - (4) Status: Pending; see 16(c)
- Additional cases are described in Attachment 13a.
- b.  A motion to  consolidate  coordinate will be filed by (*name party*):

**14. Bifurcation**

- The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (*specify moving party, type of motion, and reasons*):

**15. Other motions**

- The party or parties expect to file the following motions before trial (*specify moving party, type of motion, and issues*):

**16. Discovery**

- a.  The party or parties have completed all discovery.
  - b.  The following discovery will be completed by the date specified (*describe all anticipated discovery*):
- | <u>Party</u> | <u>Description</u> | <u>Date</u> |
|--------------|--------------------|-------------|
|--------------|--------------------|-------------|

- c.  The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (*specify*):

As detailed in the stipulation filed on April 30, an intellectual disability hearing in the related criminal matter is set to be ruled on by mid-May. The signing parties propose that the Court postpone this CMC to June 21, 2024 to give the parties time to learn the results of the trial and, if the prosecution is unsuccessful, to discuss with the DA's office when and how the parties in this matter can access the relevant evidence. The signing parties agree that inspection of the firearms is an important threshold issue which may potentially exculpate certain defendants and/or establish which, if any, is the manufacturer.

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17. **Economic litigation**

- a.  This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90-98 will apply to this case.
- b.  This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed (if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case):

18. **Other issues**

- The party or parties request that the following additional matters be considered or determined at the case management conference (specify):  
See 16(c). The signing parties request that the Court postpone this CMC to June 21, 2024.

19. **Meet and confer**

- a.  The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (if not, explain):
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (specify):  
See 16(c).

20. Total number of pages attached (if any): \_\_\_\_\_

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and alternative dispute resolution, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: 5/9/24

Robert J. Nelson \_\_\_\_\_  
(TYPE OR PRINT NAME)

▶  \_\_\_\_\_  
(SIGNATURE OF PARTY OR ATTORNEY)

Caitlin M. Nelson \_\_\_\_\_  
(TYPE OR PRINT NAME)

▶  \_\_\_\_\_  
(SIGNATURE OF PARTY OR ATTORNEY)

Additional signatures are attached.

## **CASE MANAGEMENT STATEMENT FORM: ATTACHMENT 1(b)**

This statement is submitted jointly by the parties listed below:

- Kelley and Denis O'Sullivan; and
- GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET, and GHOST FIREARMS LLC, d/b/a GRID DEFENSE and GHOSTRIFLES.COM; and
- JUGGERNAUT TACTICAL, INC. d/b/a JTACTICAL.COM; and
- RYAN BEEZLEY AND BOB BEEZLEY d/b/a RBTACTICALTOOLING.COM, THUNDER GUNS LLC, d/b/a THUNDERTACTICAL.COM, and BLACKHAWK MANUFACTURING GROUP INC., d/b/a 80PERCENTARMS.COM, MATRIX ARMS, d/b/a 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; and
- TACTICAL GEAR HEADS LLC, d/b/a 80-LOWER.COM; AR-15LOWERRECEIVERS.COM and 80LOWERJIG.COM; and
- JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM; and
- GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET (DEFENSE DISTRIBUTED).

**CASE MANAGEMENT STATEMENT FORM: ATTACHMENT 3(b)(2)**

The following parties have been served but have not appeared and have not been dismissed:

- INDUSTRY ARMAMENT INC., d/b/a AMERICANWEAPONSCOMPONENTS.COM;
- M-16 PARTS SUPPLY LLC, d/b/a M-16PARTS.COM; and
- POLYMER80, INC., d/b/a POLYMER80.COM and P80 TACTICAL.

## **CASE MANAGEMENT STATEMENT FORM: ATTACHMENT 4(b)**

The parties jointly submit this Attachment 4(b) to the Case Management Statement, as follows:

### **Plaintiffs' Statement**

Plaintiffs' daughter, a Sacramento police officer, was killed in the line of duty by one or more ghost gun products. Plaintiffs seek damages for her pain and suffering, loss of property, medical expenses, funeral expenses, and future contributions. Plaintiffs further seek punitive damages and equitable relief, including implementation of responsible business practices and abatement of public nuisance relating to Defendants' ghost gun products. Market share liability allows a plaintiff to establish a prima facie case against a group of defendants for an injury caused by a harmful product when it cannot be determined from which defendant the product originated. Liability is apportioned according to each defendant's respective market share of sales of that product when the harm occurred. It is appropriately applied here, to the extent that the very nature of Defendants' ghost gun products renders them untraceable, and Defendants together comprise a substantial share of the ghost gun market.

### **Defendants' Statement**

Plaintiffs allege that the shooting incident at issue was perpetrated using one or more semi-automatic rifles assembled using a variety of readily available component parts, including an unfinished lower receiver – or “receiver blank” – which was machined further to become an operable lower receiver incorporated into a functioning firearm. Plaintiffs seek to hold numerous manufacturers, distributors and retailers of unfinished lower receivers – which were legal to manufacture and sell – liable for the criminal misuse of their products by a third party. Plaintiffs, however, concede that they do not know which, if any, of the defendants named in this action manufactured the parts used by the shooter to assemble the firearms. Plaintiffs are pursuing a market share liability theory for this reason. Market share liability, however, is an alternative theory of liability applicable in a very narrow subset of product liability cases where a group of manufacturers produce from an identical formula a defective product that poses a singular, inherent risk of harm. It does not – and cannot – apply in this case.



## CASE MANAGEMENT STATEMENT FORM: ATTACHMENT 8

Additional representation at trial will be as follows:

- 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  
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*Attorneys for Defendants RYAN BEEZLEY AND BOB BEEZLEY d/b/a  
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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*
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Kristin Du  
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And
- Anthony M. Piscioti  
Danny Lallis  
Ryan Erdreich  
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And

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*Attorneys for Defendant GHOST GUNNER INC., d/b/a GHOSTGUNNER.NET  
(DEFENSE DISTRIBUTED)*
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Crystal Van Der Putten  
Livingston Law Firm  
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cvanderputten@livingstonlawyers.com  
Telephone: (925) 952-9880  
Facsimile: (925) 952-9881  
*Attorneys for Defendants TACTICAL GEAR HEADS LLC, d/b/a 80-LOWER.COM;  
AR-15LOWERRECEIVERS.COM and 80LOWERJIG.COM*

ATTORNEY OR PARTY WITHOUT ATTORNEY (NAME, STATE BAR # AND ADDRESS): Robert J. Nelson (State Bar No. 132797) Lieff Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor. San Francisco, CA 94111-3339 TELEPHONE NO. 415.956.1000      FAX NO. (Optional) 415.956.1008 EMAIL ADDRESS (Optional) rnelson@lchb.com ATTORNEY FOR ( <b>NAME</b> ): Kelley and Denis O'Sullivan	<b>FOR COURT USE ONLY</b>           CASE NUMBER: 34-2021-00302934  ASSIGNED DEPT:23
<b>Superior Court of California, County of Sacramento</b> 720 Ninth Street Sacramento, CA 95814-1380 (916) 874-5522—Website www.saccourt.ca.gov	
PLAINTIFF/PETITIONER: Kelley and Denis O'Sullivan  DEFENDANT/RESPONDENT: Ghost Gunner, Inc., et al.	
<b>MEDIATION STATEMENT</b>	

**A CASE MANAGEMENT CONFERENCE** is scheduled

as follows: Date: 5/24/24      Time: 10:30AM      Dept.: 23

Address of court (if different from the address above):

**INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.**

**All parties have considered Mediation as a means to resolving this case and have agreed:**

**Mediation is appropriate for this case.** Parties have submitted a *Stipulation and Order for Mediation* form or will submit a *Stipulation* within 14 days following the Case Management Conference.

**Mediation is not appropriate for this case for the following reasons:**


The parties concur that mediation is inappropriate at this early stage. The parties will reconsider whether mediation is appropriate following resolution of any demurrers and/or completion of certain critical discovery regarding the specific weapons at issue.

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I am completely familiar with this case and will be fully prepared to discuss the status of discovery and Alternative Dispute Resolution (ADR), as well as other issues raised by this statement, and will possess the authority to enter into stipulation on these issues at the time of the Case Management Conference, including the written authority of the party where required.

Date: 05/09/2024

Robert J. Nelson  
\_\_\_\_\_  
(Type or Print Name)

▶   
\_\_\_\_\_  
(Signature of Party or Attorney)

Caitlin M. Nelson  
\_\_\_\_\_  
(Type or Print Name)

▶   
\_\_\_\_\_  
(Signature of Party or Attorney)

---

Mediation Statement

1 Robert J. Nelson (State Bar No. 132797)  
2 Caitlin M. Nelson (State Bar No. 335601)  
3 Lieff Cabraser Heimann & Bernstein, LLP  
4 275 Battery Street, 29th Floor  
5 San Francisco, CA 94111-3339  
6 Telephone: 415.956.1000  
7 Facsimile: 415.956.1008  
8 rnelson@lchb.com  
9 cnelson@lchb.com

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

10 *Attorneys for Plaintiffs*

*Attorneys for Plaintiffs*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF SACRAMENTO

13 KELLEY and DENIS O’SULLIVAN, in  
14 their Individual Capacity and KELLY  
15 O’SULLIVAN as Administrator of the  
16 Estate of TARA O’SULLIVAN, Deceased,

17 Plaintiffs,

18 v.

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

21 Defendants.

Case No. 34-2021-00302934

**PROOF OF SERVICE**

**PROOF OF SERVICE**

22 I am a citizen of the United States and a resident of the County of Alameda, State of  
23 California. I am over the age of 18 years and not a party to the within action. My business  
24 mailing address is 275 Battery St, 29<sup>th</sup> Floor, San Francisco, California 94111. I am familiar with  
25 this firm's practice whereby the mail, after being placed in a designated area, is given the  
26 appropriate postage and is deposited in a U.S. mailbox after the close of the day's business.

27 X On the date indicated below, I served the document(s) designated below on all parties  
28 in said action as set forth below:

X 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  
USPS addressed as set forth below:

X 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:

1           \_\_\_ On the date indicated below, I served the document(s) designated below by  
2 transmitting a true copy thereof via Fax to the person(s) and at the Fax number(s) set forth  
3 below:

4                                   **CASE MANAGEMENT STATEMENT FORM AND ATTACHMENTS**

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1 I declare under penalty of perjury, under the laws of the State of California, that  
2 the foregoing is true and correct. Executed May 9, 2024, at San Francisco,  
3 California.

4 /s/ Caitlin M. Nelson  
5 CAITLIN M. NELSON  
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