

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.

PLAINTIFF/PETITIONER: Kelley and Denis O'Sullivan	CASE NUMBER:
DEFENDANT/RESPONDENT: Ghost Gunner, Inc., et al.	34-2021-00302934

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)*: This action has been repeatedly stayed due to the unavailability of certain critical evidence pending resolution of a related criminal prosecution.
 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)*:

(1) At least one claim exceeds the jurisdictional limit on amount in controversy; and (2) Plaintiffs demand equitable relief.

PLAINTIFF/PETITIONER: Kelley and Denis O'Sullivan	CASE NUMBER:
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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 are willing to participate in the following ADR processes (<i>check all that apply</i>):	If the party or parties completing this form in the case have agreed 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	☐	☐ Mediation session not yet scheduled ☐ Mediation session scheduled for (date): ☐ Agreed to complete mediation by (date): ☐ Mediation completed on (date):
(2) Settlement conference	☐	☐ Settlement conference not yet scheduled ☐ Settlement conference scheduled for (date): ☐ Agreed to complete settlement conference by (date): ☐ Settlement conference completed on (date):
(3) Neutral evaluation	☐	☐ Neutral evaluation not yet scheduled ☐ Neutral evaluation scheduled for (date): ☐ Agreed to complete neutral evaluation by (date): ☐ Neutral evaluation completed on (date):
(4) Nonbinding judicial arbitration	☐	☐ Judicial arbitration not yet scheduled ☐ Judicial arbitration scheduled for (date): ☐ Agreed to complete judicial arbitration by (date): ☐ Judicial arbitration completed on (date):
(5) Binding private arbitration	☐	☐ Private arbitration not yet scheduled ☐ Private arbitration scheduled for (date): ☐ Agreed to complete private arbitration by (date): ☐ Private arbitration completed on (date):
(6) Other (<i>specify</i>):	☐	☐ ADR session not yet scheduled ☐ ADR session scheduled for (date): ☐ Agreed to complete ADR session by (date): ☐ ADR completed on (date):

PLAINTIFF/PETITIONER: Kelley and Denis O'Sullivan	CASE NUMBER:
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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: Sentencing concluded; 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>
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Discovery has not commenced. The parties can propose a discovery schedule once the relevant physical evidence becomes available for inspection.

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

This will be the parties' first CMC before this Court. The parties recommend that the CMC be used to familiarize the Court with the procedural history of this case (which has been largely stayed pending resolution of a related criminal matter) and to discuss next steps. Following conclusion of formal sentencing in the criminal prosecution, the parties have been in communication with the Sacramento City Attorneys' office regarding how and when certain key physical evidence may be made available for the parties' inspection, and the extent of any limitations that would be imposed by the City due to the potential for appeals in the criminal matter. The City Attorney has advised that: (1) a court order is likely needed for law enforcement to comply with any subpoena for a physical inspection; and (2) the parties must confer with counsel in the criminal matter regarding any objections they may have to the inspection. Plaintiffs intend to limit the inspection to firearms (and related parts) that were used in the shooting of Officer O'Sullivan and/or the standoff that followed.

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DEFENDANT/RESPONDENT: Ghost Gunner, Inc., et al.	

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*):

The parties wish to discuss the application of Cal. Civ. Proc. Code § 583.340(b) -- computing the time within which an action must be brought to trial under § 583.310 -- to this case.

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: 10/02/2025

Robert J. Nelson

(TYPE OR PRINT NAME)

▶ 

(SIGNATURE OF PARTY OR ATTORNEY)

▶

(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
- 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 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).
- WM. C. ANDERSON, INC., d/b/a ANDERSONMANUFACTURING.COM

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;
- 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
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Long Beach, CA 90802
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Telephone: 562-216-4444
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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/
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And

- Richard Linkert
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*Attorneys for Defendants GHOST FIREARMS LLC, d/b/a GRID DEFENSE and
GHOSTRIFLES.COM*

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*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 (NAME): Kelley and Denis O'Sullivan	FOR COURT USE ONLY
Superior Court of California, County of Sacramento 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.	
MEDIATION STATEMENT	CASE NUMBER: 34-2021-00302934 ASSIGNED DEPT: 22

A CASE MANAGEMENT CONFERENCE is scheduled as follows: Date: 10/17/2025 Time: 10:30AM Dept.: 22 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.

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: 10/02/2025

Robert J. Nelson

 (Type or Print Name)

► 

 (Signature of Party or Attorney)

 (Type or Print Name)

► _____
 (Signature of Party or Attorney)

Mediation Statement

Robert J. Nelson (State Bar No. 132797)
Caitlin M. Woods (State Bar No. 335601)
Lief Cabraser Heimann & Bernstein,
LLP 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415.956.1000
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Philip Bangle (admitted *pro hac vice*)
Brady: United Against Gun Violence
840 First Street, NE Suite 400
Washington, DC 20002
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pbangle@bradyunited.org

Attorneys for Plaintiffs

Attorneys for Plaintiffs

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

PROOF OF SERVICE

PROOF OF SERVICE

I am a citizen of the United States and a resident of the County of New York, State of New York. I am over the age of 18 years and not a party to the within action. My business mailing address is 250 Hudson St, 8th Floor, New York, New York 10013. I am familiar with 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.

X On the date indicated below, I served the document(s) designated below on all parties 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**

5 6 7 8 9 10 11 12 13 14 15 16 17 18	David A. Melton Haley Lohei Porter Scott Law Firm 350 University Ave, Suite 200 Sacramento, CA Email: dmelton@porterscott.com hlohei@porterscott.com Telephone: 916.929.1481 Facsimile : 916.927.3706 Anthony M. Piscioti Danny Lallis Ryan Erdreich Pisciotti Lallis Erdreich 30 Columbia Turnpike, Suite 205 Florham Park, NJ 07932 TEL: (973)245-8100 FAX: (973)245-8101 Email: apisciotti@pisciotti.com dlallis@pisciotti.com rerdreich@pisciotti.com <i>Attorneys for Defendants, JAMES TROMBLEE, JR., d/b/a USPATRIOTARMORY.COM</i> (VIA EMAIL ONLY)	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 <i>Attorneys for Defendants, RYAN BEEZLEY AND BOB BEEZLEY d/b/a RBTACTICIALTOOLING.COM, THUNDER GUNS LLC, d/b/a THUNDERTACTICAL.COM, 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 (VIA EMAIL ONLY)</i>
19 20 21 22 23 24 25 26 27 28	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 <i>Attorneys for Defendant GHOST FIREARMS LLC, d/b/a GRID DEFENSE and GHOSTRIFLES.COM</i> (VIA EMAIL ONLY)	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 <i>Attorneys for Defendant WM. C. ANDERSON, INC., d/b/a ANDERSONMANUFACTURING.COM</i> (VIA EMAIL ONLY)

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Howard Schilsky Christopher Renzulli Renzulli Law Firm, LLP One N. Broadway, Suite 1005 White Plains, NY 10601 Email: hschilsky@renzullilaw.com Telephone: 914-285-0700 Facsimile : 914-285-1213 And Richard Linkert Madison Simmons Matheny Sears Linkert & Jaime LLP 3638 American River Drive Sacramento, CA 95864-4711 rlinkert@mathenysears.com msimmons@mathenysears.com <i>Attorneys for Defendant, JUGGERNAUT TACTICAL, INC. d/b/a JTACTICAL.COM</i> (VIA EMAIL ONLY)	INDUSTRY ARMAMENT INC., d/b/a AMERICANWEAPONSCOMPONENTS.COM CT Corp Trust Co 1209 N Orange Street Wilmington, DE 19801-1120 (VIA REGULAR MAIL ONLY)
POLYMER80, INC., d/b/a POLYMER80.COM and P80 TACTICAL 134 Lakes Blvd. Dayton, NV 89403 (VIA REGULAR MAIL ONLY)	M-16 PARTS SUPPLY LLC, d/b/a M- 16PARTS.COM c/o Terry J. Weisflog 5918 England Avenue Orlando, FL 32808 (VIA REGULAR MAIL ONLY)

1 I declare under penalty of perjury, under the laws of the State of California, that
2 the foregoing is true and correct. Executed October 2, 2025, at
3 New York, New York.

4 /s/ Juliana Remuszka
JULIANA REMUSZKA

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