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Attorneys for Plaintiffs

Attorneys for Plaintiffs

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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 Lauri A.
Damrell; Dept. 22]*

**JOINT STIPULATION RE: CASE
SCHEDULE**

Plaintiffs and Defendants WM. C. Anderson, Inc., Juggernaut Tactical, Inc., Ghost
Firearms, LLC, Tactical Gear Heads, LLC, 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, Ghost Gunner, Inc. (Defense Distributed), James Tromblee,
Jtr., d/b/a US Patriot Armory, and Polymer80, Inc., by and through their respective counsel of
record, hereby stipulate as follows:

WHEREAS, at the October 17, 2025 Case Management Conference, the parties and the
Court discussed the parties’ discussions with the City Attorney’s office regarding the parties’
efforts to access certain critical evidence from a related criminal prosecution;

WHEREAS, the parties have received and are reviewing additional information regarding

1 the at-issue evidence;

2 WHEREAS, the parties would benefit from additional time to review this new information
3 in consultation with their experts, confer regarding whether a physical inspection remains
4 necessary, and determine what steps can be completed without the Court's intervention;

5 THEREFORE, the parties jointly request to continue the case management conference set
6 for December 19, 2025 to January 16, 2026.

7 IT IS SO STIPULATED.

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9 Dated: December 4, 2025

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

/s/ Robert J. Nelson

Robert J. Nelson

Attorneys for Plaintiffs

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13 Dated: December 4, 2025

RENZULLI LAW FIRM, LLP

/s/ Howard Schilsky

Howard Schilsky

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

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17 Dated: December 4, 2025

**KOELLER NEBEKER, CARLSON &
HALUCK, LLP**

/s/ Brian M. Sanders

Brian M. Sanders

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

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23 Dated: December 4, 2025

MICHAEL & ASSOCIATES, P.C.

/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*

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Dated: December 4, 2025

JACOBSEN & MCELROY PC

/s/ David H. Pollock
David H. Pollock
*Attorneys for Defendant GHOST FIREARMS
LLC, d/b/a GRID DEFENSE and
GHOSTRIFLES.COM*

Dated: December 4, 2025

LIVINGSTON LAW FIRM

/s/ Craig Livingston
Craig Livingston
*Attorneys for Defendants TACTICAL GEAR
HEADS LLC, d/b/a 80-LOWER.COM; AR-
15LOWERRECEIVERS.COM and
80LOWERJIG.COM*

Dated: December 4, 2025

DILLON LAW GROUP APC

/s/ John Dillon
John Dillon
*Attorneys for Defendant Ghost Gunner, Inc.
(Defense Distributed)*

Dated: December 4, 2025

PISCIOTTI LALLIS ERDREICH, P.C.

/s/ Ryan Erdreich
Ryan Erdreich
*Attorneys for Defendant JAMES TROMBLEE,
JR., d/b/a USPATRIOTARMORY.COM*

Dated: December 4, 2025

QUINN & KRONLUND, LLP

/s/ Michael Kronlund
Michael Kronlund
Attorneys for Defendant POLYMER80, INC.

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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 December 19, 2025 is continued to January 16, 2026.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Lauri A. Damrell
Judge of the Superior Court