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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 the related criminal prosecution;

WHEREAS, the parties recently received and reviewed additional information bearing on

1 the at-issue evidence, and have determined that a physical inspection remains necessary;

2 WHEREAS, the parties have been conferring with counsel in the related criminal
3 prosecution regarding whether the parties' proposed conditions for a physical inspection are
4 agreeable, and have been advised that the parties will receive defense counsel's position on this
5 matter in early 2026;

6 WHEREAS, following receipt of defense counsel's position, the parties will continue to
7 confer in order to get a physical inspection scheduled promptly, and agree that there is no need
8 for the Court's intervention at this stage;

9 THEREFORE, the parties jointly request to continue the case management conference set
10 for January 16, 2026 to February 13, 2026.

11 IT IS SO STIPULATED.

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13 Dated: December 31, 2025

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

/s/ Robert J. Nelson

Robert J. Nelson

Attorneys for Plaintiffs

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17 Dated: December 31, 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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21 Dated: December 31, 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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27 Dated: December 31, 2025

MICHAEL & ASSOCIATES, P.C.

/s/ Sean Brady

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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: December 31, 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 31, 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 31, 2025

DILLON LAW GROUP APC

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

Dated: December 31, 2025

PISCIOTTI LALLIS ERDREICH, P.C.

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

Dated: December 31, 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 January 16, 2026 is continued to February 13, 2026.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Lauri A. Damrell
Judge of the Superior Court