

1 Robert J. Nelson (State Bar No. 2999217)  
2 Caitlin M. Woods (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 cwoods@lchb.com

10 *Attorneys for Plaintiffs*

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

*Attorneys for Plaintiffs*

**FILED**  
Superior Court of California  
County of Sacramento  
01/09/2026  
V. Aleman, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SACRAMENTO

11 KELLEY and DENNIS O’SULLIVAN, in  
12 their Individual Capacity and KELLY  
13 O’SULLIVAN as Administrator of the  
14 Estate of TARA O’SULLIVAN, Deceased,

15 Plaintiffs,

16 vs.

17 GHOST GUNNER INC., d/b/a  
18 GHOSTGUNNER.NET, et al.,

19 Defendants.

Case No. 34-2021-00302934-CU-PO-GDS

*[Assigned to the Honorable Judge Lauri A. Damrell; Dept. 22]*

**JOINT STIPULATION RE: CASE SCHEDULE**

20 Plaintiffs and Defendants WM. C. Anderson, Inc., Juggernaut Tactical, Inc., Ghost  
21 Firearms, LLC, Tactical Gear Heads, LLC, Ryan Beezley and Bob Beezley, Thunder Guns, LLC,  
22 Matrix Arms, Blackhawk Manufacturing Group, Inc., James Madison Tactical, Inc., JSD Supply,  
23 and MFY Technical Solutions, LLC, Ghost Gunner, Inc. (Defense Distributed), James Tromblee,  
24 Jtr., d/b/a US Patriot Armory, and Polymer80, Inc., by and through their respective counsel of  
25 record, hereby stipulate as follows:

26 WHEREAS, at the October 17, 2025 Case Management Conference, the parties and the  
27 Court discussed the parties’ discussions with the City Attorney’s office regarding the parties’  
28 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.

12  
13 Dated: December 31, 2025

**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

*/s/ Robert J. Nelson*

Robert J. Nelson

*Attorneys for Plaintiffs*

14  
15  
16  
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*

18  
19  
20  
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: 01/09/2026



A handwritten signature in black ink, appearing to read "L. Damrell".

Honorable Judge Lauri A. Damrell  
Judge of the Superior Court