

1 Robert J. Nelson (State Bar No. 2999217)
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 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

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
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: VOLUNTARY
DISMISSAL WITHOUT PREJUDICE**

Plaintiffs and Defendants Ryan Beezley and Bob Beezley, JSD Supply, and Thunder
Guns, LLC, by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, Plaintiffs filed a complaint in the above-captioned action on June 17, 2021
naming multiple defendants, including Ryan Beezley and Bob Beezley, JSD Supply, and Thunder
Guns, LLC;

WHEREAS, Plaintiffs’ claims arise from a shooting that occurred on June 19, 2019,
alleging that Defendants are liable as possible manufacturers of the relevant firearm product(s);

WHEREAS, this action has been largely stayed pending resolution of a related criminal
matter due to the parties’ inability to access certain critical evidence;

WHEREAS, the undersigned parties have conferred and Defendants Ryan Beezley and

1 Bob Beezley, JSD Supply, and Thunder Guns, LLC have represented to Plaintiffs via sworn
2 declarations that prior to June 19, 2019, Ryan Beezley and Bob Beezley, JSD Supply, and
3 Thunder Guns, LLC never manufactured for sale any of firearm products relevant in this action to
4 the public;

5 WHEREAS, the undersigned parties have agreed to voluntary dismissal of all claims
6 against Defendants Ryan Beezley and Bob Beezley, JSD Supply, and Thunder Guns, LLC
7 without prejudice, with each side to bear its own costs, and with limited tolling of all relevant
8 statutes of limitation;

9 IT IS THEREFORE STIPULATED AND AGREED by the undersigned parties, subject to
10 the Court's approval, as follows:

11 All claims brought in this action against Defendants Ryan Beezley and Bob Beezley, JSD
12 Supply, and Thunder Guns, LLC are dismissed without prejudice, with each party to bear its own
13 costs. All statutes of limitation for all claims, cross-claims, or counterclaims which have been or
14 could have been brought in this action against Defendants Ryan Beezley and Bob Beezley, JSD
15 Supply, and Thunder Guns, LLC are tolled for one (1) year as of the date of this Order.

16
17 Dated: January 21, 2026

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

/s/ Robert J. Nelson

Robert J. Nelson

18
19
20 Dated: January 21, 2026

**BRADY: UNITED AGAINST GUN
VIOLENCE**

/s/ Philip Bangle

Philip Bangle

Attorneys for Plaintiffs

21
22
23
24 Dated: January 21, 2026

MICHAEL & ASSOCIATES, P.C.

/s/ Sean Brady

Sean Brady

*Attorneys for Defendants Ryan Beezley and Bob
Beezley, JSD Supply, and Thunder Guns, LLC*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROPOSED ORDER

Pursuant to the parties’ stipulation and Cal. Civ. Proc. Code § 581, it is hereby
ORDERED that:

All claims brought in this action against Defendants Ryan Beezley and Bob Beezley, JSD
Supply, and Thunder Guns, LLC are dismissed without prejudice, with each party to bear its own
costs. All statutes of limitations for all claims, cross-claims, or counterclaims which have been or
could have been brought in this action against Defendants Ryan Beezley and Bob Beezley, JSD
Supply, and Thunder Guns, LLC are tolled for one (1) year as of the date of this Order.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Lauri A. Damrell
Judge of the Superior Court