

1 [Parties and counsel listed on signature pages]  
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SACRAMENTO  
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11 KELLEY and DENIS 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.  
20

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

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

**AGENDA AND JOINT STATEMENT FOR  
FEBRUARY 13, 2026 CASE  
MANAGEMENT CONFERENCE**

21 Pursuant to Local Rule 2.51, the undersigned parties<sup>1</sup> (“the parties”) submit this agenda  
22 and joint statement in advance of the case management conference (“CMC”) set for February 13,  
23 2026.

24 **I. Background**

25 This is a personal injury case arising from the death of Plaintiffs’ daughter, Sacramento  
26 Police Officer Tara O’Sullivan, who was murdered by an individual wielding multiple “ghost  
27

28 <sup>1</sup> Counsel for Defendant Ghost Gunner, Inc. did not respond to Plaintiffs’ counsel regarding whether their client would like to join in this joint CMCS.

1 guns.” Defendants are manufacturers of ghost gun products, and have been named via market  
2 share liability. Plaintiffs bring claims for: (1) negligence; (2) negligence *per se*; (3) negligent  
3 entrustment; (4) public nuisance; and (5) violations of Business & Professions Code § 17200 *et*  
4 *seq.*

5  
6 This action has been largely stayed since filing of the Complaint due to the unavailability  
7 of certain critical evidence pending resolution of the related criminal prosecution of the shooter.  
8 Since sentencing in the prosecution concluded, the parties have been working with the City  
9 Attorney’s office (as counsel for the Sacramento Police Department, which has custody of the  
10 evidence) to gain access to the relevant evidence. The parties agree that a physical inspection of  
11 the evidence is necessary to determine which, if any, Defendants may be properly dismissed at  
12 this stage. Following resolution of that threshold issue, the parties will be able to proceed with  
13 setting a schedule for discovery and responses to the Complaint.  
14

## 15 **II. Physical inspection of firearm evidence**

16 At the October 17, 2025 CMC, the parties and the Court discussed the parties’ efforts to  
17 work with the Sacramento City Attorney’s office to gain access to evidence from the related  
18 criminal prosecution. Following the October CMC, the parties received and reviewed additional  
19 information bearing on the at-issue evidence, and determined that a physical inspection remained  
20 necessary. The parties then conferred with counsel in the related criminal prosecution and the  
21 City Attorney’s office to draft mutually agreeable language for a records subpoena detailing the  
22 conditions of the physical inspection. Plaintiffs served the subpoena on January 22, 2026. On  
23 January 27, 2026, the City Attorney’s office confirmed that a court order is required for the  
24 Sacramento Police Department to comply with the subpoena, but that with such an order, the  
25 Department has no objection to proceeding as described in the subpoena. Accordingly, Plaintiffs  
26  
27  
28

1 will file a motion to compel compliance in short order.<sup>2</sup>

2 **III. Dismissal of non-manufacturer Defendants**

3 On January 21, 2026, Plaintiffs and Defendants Ryan and Bob Beezley, JSD Supply, and  
4 Thunder Guns, LLC filed a joint stipulation seeking the Court's approval to dismiss without  
5 prejudice these three Defendants, who attested that they never manufactured for sale to the public  
6 any of the firearm products relevant in this action.  
7

8 \* \* \*

9 The parties will be prepared to address the above issues at the upcoming CMC on  
10 February 13, 2026. Counsel from the City Attorney's office is also willing to attend the CMC if  
11 the Court deems it necessary.  
12

13 Respectfully submitted,

14 Dated: January 29, 2026

**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

15  
16 /s/ Robert J. Nelson  
Robert J. Nelson

17  
18 *Attorneys for Plaintiffs Kelley and Denis  
O'Sullivan*

19  
20 Dated: January 29, 2026

**RENZULLI LAW FIRM, LLP**

21 /s/ Howard Schilsky  
Howard Schilsky  
22 *Attorneys for Defendant JUGGERNAUT  
23 TACTICAL, INC. d/b/a JTACTICAL.COM*

24 Dated: January 29, 2026

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

25  
26 /s/ Brian M. Sanders  
Brian M. Sanders  
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28 <sup>2</sup> The City Attorney's office will stipulate that Plaintiffs need not wait 60 days to serve such a motion. *See* Cal. Civ. Code § 2025.480(b).

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

Dated: January 29, 2026

**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*

Dated: January 29, 2026

**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: January 29, 2026

**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: January 29, 2026

**PISCIOTTI LALLIS ERDREICH, P.C.**

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

Dated: January 29, 2026

**QUINN & KRONLUND, LLP**

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