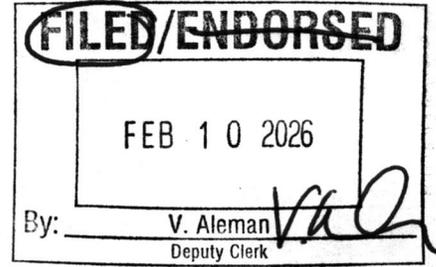


1 [Parties and counsel listed on signature pages]



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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SACRAMENTO

10
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.

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

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

**STIPULATION AND ~~PROPOSED~~
ORDER RE: MOTION TO COMPEL
COMPLIANCE WITH RECORDS
SUBPOENA**

20
21 Pursuant to Cal. Rules of Court 3.503 and 5.94 and Local Rule 5.14, subject to the Court’s
22 approval, Plaintiffs and third party the Sacramento Police Department (the “Department”), by and
23 through their respective counsel of record, hereby stipulate as follows:

24 WHEREAS, on January 22, 2026—following extensive coordination between the parties
25 in this matter, counsel for the People and the criminal defendant in the related criminal matter,
26 and the Department—Plaintiffs served on the Department a business records subpoena (the
27 “Records Subpoena”) detailing the conditions for the parties’ inspection of certain critical
28 evidence in the Department’s custody;

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1 WHEREAS, as set forth in Plaintiffs' Proposed Motion to Compel Compliance with
2 Records Subpoena (the "Proposed Motion"), attached hereto as **Exhibit A**, and as will be further
3 set forth in the Department's anticipated response, it is the Department's position that the
4 Department requires a court order to comply with the Records Subpoena;

5 WHEREAS, the Department stipulates that there is no substantive issue with the Records
6 Subpoena, which represents the agreement of all interested parties as to acceptable conditions for
7 an evidence inspection;

8 WHEREAS, the Department stipulates that Plaintiffs need not wait 60 days to file the
9 Proposed Motion as set forth in Cal. Civ. Code § 2025.480(b);

10 WHEREAS, Plaintiffs and the Department agree that these unique circumstances present
11 good cause for an expedited schedule for briefing and hearing Plaintiffs' Proposed Motion;

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

- 14 - Plaintiffs may file Plaintiffs' Motion to Compel Compliance with Records Subpoena
15 once this order is entered;
- 16 - Any party who wishes to file a response, including the Sacramento Police Department,
17 shall do so no later than 9:00 a.m. on ~~February 11, 2026~~, *February 17, 2026*
- 18 - No replies shall be filed; and
- 19 - If necessary, Plaintiffs' Motion to Compel Compliance with Records Subpoena will be
20 heard at the Case Management Conference before this Court on February 13, 2026 at
21 10:30 a.m.

22
23 Dated: February 5, 2026

**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**

/s/ Robert J. Nelson

Robert J. Nelson

*Attorneys for Plaintiffs Kelley and Denis
O'Sullivan*

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Dated: February 5, 2026

**OFFICE OF THE SACRAMENTO CITY
ATTORNEY**

/s/ Beau Parkhurst
Beau Parkhurst
*Attorneys for Third Party SACRAMENTO
POLICE DEPARTMENT*

~~PROPOSED~~ ORDER

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Having reviewed the parties' stipulation and for good cause shown, it is hereby

ORDERED that:

- Plaintiffs may file Plaintiffs' Motion to Compel Compliance with Records Subpoena once this order is entered;
- Any party who wishes to file a response, including the Sacramento Police Department, shall do so no later than 9:00 a.m. on ~~February 11, 2026~~, February 17, 2026
- No replies shall be filed; and
- If necessary, Plaintiffs' Motion to Compel Compliance with Records Subpoena will be heard at the Case Management Conference before this Court on ~~February 13, 2026~~ at 10:30 a.m. February 20, 2026

Date: 2/10/26



[Handwritten Signature]
Hon. Lauri A. Darnrell
Judge of the Superior Court