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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF SACRAMENTO

13 KELLEY and DENIS O’SULLIVAN, in  
14 their Individual Capacity and KELLY  
15 O’SULLIVAN as Administrator of the  
16 Estate of TARA O’SULLIVAN, Deceased,

17 Plaintiffs,

18 vs.

19 GHOST GUNNER INC., d/b/a  
20 GHOSTGUNNER.NET, et al.,

21 Defendants.

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

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

**DECLARATION OF CAITLIN M. WOODS  
IN SUPPORT OF MOTION TO COMPEL  
COMPLIANCE WITH RECORDS  
SUBPOENA**

22 I, Caitlin M. Woods declare, and would testify to the following:

23 1. I am a partner with the law firm of Lieff Cabraser Heimann & Bernstein, LLP,  
24 counsel for Plaintiffs in the above-captioned litigation. I am a member of the State Bar of  
25 California, and am admitted to practice before this Court. Pursuant to Cal. Civ. Code § 2016.040,  
26 I submit this declaration in support of Plaintiffs’ Motion to Compel Compliance with Records  
27 Subpoena to memorialize the relevant parties’ good faith efforts to resolve this issue informally. I  
28 make this declaration on the basis of my personal knowledge and, if called as a witness, I could  
and would testify truthfully as to its contents.

1           2.       Since filing of the Complaint, this action has been largely stayed because critical  
2 evidence—including the firearms used in the rampage that killed Officer O’Sullivan—has been  
3 unavailable pending resolution of the prosecution of the shooter.

4           3.       After sentencing concluded in the criminal prosecution action in late June 2025,  
5 the parties began working with Deputy City Attorney Beau Parkhurst (as counsel for the  
6 Sacramento Police Department, which has custody of the at-issue evidence) to discuss how and  
7 when the parties in this civil action can gain access.

8           4.       Through a lengthy negotiation process between the parties in this matter, counsel  
9 for the People and the defendant in the criminal matter, and counsel for SPD, all agreed upon  
10 language for a business records subpoena detailing the conditions for such an inspection.

11          5.       On January 22, 2026, Plaintiffs served the subpoena with the negotiated language  
12 regarding the inspection conditions on counsel for SPD, attached hereto as **Exhibit A**.

13          6.       On January 27, 2026, I conferred with Mr. Parkhurst, who confirmed his position  
14 that SPD requires a court order to comply with the subpoena because of the sensitive nature of the  
15 evidence to be inspected, but otherwise has no objection to proceeding as described in the  
16 subpoena.

17               I declare under penalty of perjury that the foregoing is true and correct.

18               Executed in Oakland, California.

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Date: February 12, 2026

*/s/ Caitlin M. Woods*

\_\_\_\_\_  
Caitlin M. Woods

# **EXHIBIT A**



PLAINTIFF/PETITIONER: Kelley and Denis O'Sullivan DEFENDANT/RESPONDENT: Ghost Gunner, Inc. et al.	CASE NUMBER: 34-2021-00302934
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR  
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

- a. Person served (*name*):
- b. Address where served:
  
- c. Date of delivery:
- d. Time of delivery:
- e. (1)  Witness fees were paid.  
Amount: ..... \$ \_\_\_\_\_
- (2)  Copying fees were paid.  
Amount: ..... \$ \_\_\_\_\_
- f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

- a.  Not a registered California process server.
- b.  California sheriff or marshal.
- c.  Registered California process server.
- d.  Employee or independent contractor of a registered California process server.
- e.  Exempt from registration under Business and Professions Code section 22350(b).
- f.  Registered professional photocopier.
- g.  Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

**I declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**(For California sheriff or marshal use only)**  
**I certify** that the foregoing is true and correct.

Date:

Date:

 \_\_\_\_\_  
(SIGNATURE)

 \_\_\_\_\_  
(SIGNATURE)

### **ATTACHMENT 3: ITEMS TO BE MADE AVAILABLE FOR INSPECTION**

1. The item(s) identified as People's Exhibit 5A1 in the March 2025 trial in *People v. Ramos*, Sacramento Superior Court No. 19FE011057.

To maintain the chain of custody and preservation of the evidence, all interested parties<sup>1</sup> agree that the inspection will occur under the following conditions:

1. The inspection will occur in the Sacramento Police Department's Evidence and Property Facility (555 Sequoia Pacific Blvd., Sacramento, CA), on a Friday when the facility is closed to the public.
2. Only the following individuals will be permitted to attend the inspection:
  - a. Counsel for the parties in the *O'Sullivan* matter;
  - b. Consultants retained by the parties in the *O'Sullivan* matter;
  - c. A videographer;
  - d. A lawyer and an investigator for Adel Ramos<sup>2</sup>; and
  - e. Any individuals that the Sacramento Police Department deems necessary to oversee the inspection, including counsel for the Department.
3. All attendees will sign an attendance log with their name, role in the inspection, time of arrival, and time of departure.
4. The videographer will videotape the full inspection, recording both video and audio.<sup>3</sup>
5. Only employee(s) of the Sacramento Police Department will physically handle the evidence.
6. Any Sacramento Police Department employee(s) who physically handle the evidence will do so wearing gloves, and will return the item(s) to their proper packaging.
7. The Sacramento Police Department employee(s) who physically handle the evidence will take direction from the parties (counsel and/or consultants) to manipulate the item(s) to allow for, e.g., viewing, measurement, and/or photographing.
8. The Sacramento Police Department representative(s) in attendance will ensure the parties' compliance with these conditions.

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<sup>1</sup> This includes counsel for the parties in the *O'Sullivan* civil matter, prosecution and defense counsel in the *Ramos* criminal matter, and counsel for the Sacramento Police Department.

<sup>2</sup> Counsel for the *O'Sullivan* Plaintiffs will provide counsel for Mr. Ramos at least three weeks' notice before the scheduled date of the inspection.

<sup>3</sup> Counsel for the *O'Sullivan* Plaintiffs will provide the California Appellate Project (counsel for Mr. Ramos) an unedited copy of the videotape within two weeks of the inspection.

SUPERIOR COURT OF CALIFORNIA, COUNTY  
OF SACRAMENTO

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KELLEY AND DENIS O'SULLIVAN

Plaintiff

v.

GHOST GUNNER, INC. et al.

Defendant

AFFIRMATION OF SERVICE

File/Index No.: 34-2021-00302934

Issued On:

Alt File/Index No.: Calendar No.:

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**SERVICE UPON: Beau E. Parkhurst; Senior Deputy City Attorney**

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO: ss

Emma Correa hereby affirms that: I am not a party to the within action, am over the age of 18 years and reside in the State of California.

On 1/23/2026 at 9:12 AM at Sacramento City Attorney's Office, 915 I St Fl 4, Sacramento, CA 95814-2621, I effected service of process of the following documents: DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS (w/ attachment 3) upon Beau E. Parkhurst; Senior Deputy City Attorney.

By delivering to and leaving a true copy thereof with Jason "Doe" (refused to provide last name) the City Hall Security Guard who is authorized to accept service on behalf of Beau E. Parkhurst; Senior Deputy City Attorney.

I describe the recipient at the time of service as follows: Gender: Male Race/Skin: Cacusian Age: 29 Height: 5'7 Weight: 160 Hair: Brown Eyes: Brown

I affirm this 27th day of January, 2026 under the penalties of perjury under the laws of California, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



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Emma Correa 2022-021  
Nationwide Legal, LLC  
225 30th Street, Suite 205  
Sacramento, CA 95816  
(916) 443-4400



Order #:NY4048