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10 *Attorneys for Plaintiffs*

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Attorneys for Plaintiffs

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

13 KELLEY and DENNIS 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. 8B]

**JOINT STIPULATION RE: CASE
SCHEDULE**

22 Plaintiffs and Defendants Anderson Manufacturing, Ghost Firearms, Tactical Gear Heads,
23 Matrix Arms, Blackhawk Manufacturing Group, MFY Technical Solutions, Defense Distributed,
24 U.S. Patriot Armory, and Polymer80, by and through their respective counsel of record, hereby
25 stipulate as follows:

26 WHEREAS, as discussed at the last case management conference, counsel and experts for
27 the parties attended an inspection of the firearm relevant to Plaintiffs’ claims under the
28 supervision of the Sacramento Police Department on April 3, 2026;

WHEREAS, the parties’ experts would benefit from additional time to compile findings
from the inspection in order to facilitate discussions regarding potential voluntary dismissal(s);

THEREFORE, the parties jointly request that the Court:

- 1 - Continue the case management conference set for Friday, May 1, 2026 at 10:30 a.m.
2 to Friday, May 29, 2026 at 10:30 a.m.;
- 3 - Require Defendants to submit to Plaintiffs any requests for dismissal on the basis of
4 differences between the firearm inspected by the parties and Defendants' relevant
5 product(s) by Friday, May 1, 2026;
- 6 - Require a case management conference statement by Thursday, May 14, 2026.

7 IT IS SO STIPULATED.

8
9 Dated: April 15, 2026

**LIEFF CABRASER HEIMANN &
BERNSTEIN**

/s/ Robert J. Nelson

Robert J. Nelson

Attorneys for Plaintiffs

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12
13 Dated: April 15, 2026

**KOELLER NEBEKER, CARLSON &
HALUCK**

/s/ Brian M. Sanders

Brian M. Sanders

*Attorneys for Defendant Anderson
Manufacturing*

14
15
16
17 Dated: April 15, 2026

MICHAEL & ASSOCIATES

/s/ Sean Brady

Sean Brady

*Attorneys for Defendants Matrix Arms,
Blackhawk Manufacturing Group, and MFY
Technical Solutions*

18
19
20
21
22 Dated: April 15, 2026

JACOBSEN & MCELROY

/s/ David H. Pollock

David H. Pollock

Attorneys for Defendant Ghost Firearms

23
24
25
26 Dated: April 15, 2026

LIVINGSTON LAW FIRM

/s/ Craig Livingston

Craig Livingston

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Attorneys for Defendant Tactical Gear Heads

Dated: April 15, 2026

DILLON LAW GROUP

/s/ John Dillon
John Dillon
Attorneys for Defendant Ghost Gunner

Dated: April 15, 2026

PISCIOTTI LALLIS ERDREICH

/s/ Ryan Erdreich
Ryan Erdreich
Attorneys for Defendant U.S. Patriot Armory

Dated: April 15, 2026

QUINN & KRONLUND

/s/ Michael Kronlund
Michael Kronlund
Attorneys for Defendant Polymer80

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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 Friday, May 1, 2026 at 10:30 a.m. is continued to Friday, May 29, 2026 at 10:30 a.m. Defendants shall submit to Plaintiffs any requests for dismissal on the basis of differences between the firearm inspected by the parties and Defendants’ relevant product(s) by Friday, May 1, 2026. The parties shall file a case management conference statement by Thursday, May 14, 2026.

IT IS SO ORDERED.

Dated: _____

Honorable Judge Lauri A. Damrell
Judge of the Superior Court