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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: VOLUNTARY  
DISMISSAL WITHOUT PREJUDICE**

22 Plaintiffs and Defendant Ghost Firearms LLC (“Ghost Firearms”), by and through their  
23 respective counsel of record, hereby stipulate as follows:

24 WHEREAS, Plaintiffs filed a complaint in the above-captioned action on June 17, 2021  
25 naming multiple defendants, including Ghost Firearms;

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

28 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 parties conducted an inspection of the evidence at issue on April 3, 2026;

WHEREAS, the undersigned parties have conferred and concur that, based on the parties’

1 findings at the April 3, 2026 inspection, voluntary dismissal of Defendant Ghost Firearms is  
2 appropriate because the products that Ghost Firearms manufactured for sale prior to June 19,  
3 2019 are readily distinguishable from the products at issue in this action;

4 WHEREAS, the undersigned parties have agreed to voluntary dismissal of all claims  
5 against Defendant Ghost Firearms without prejudice, with each side to bear its own costs, and  
6 with limited tolling of all relevant statutes of limitation;

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

9 All claims brought in this action against Defendant Ghost Firearms are dismissed without  
10 prejudice, with each party to bear its own costs. All statutes of limitation for all claims, cross-  
11 claims, or counterclaims which have been or could have been brought in this action against or by  
12 Defendant Ghost Firearms are tolled for one (1) year as of the date of this Order.

13  
14 Dated: May 12, 2026

**LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP**

*/s/ Robert J. Nelson*  
\_\_\_\_\_  
Robert J. Nelson

15  
16  
17 Dated: May 12, 2026

**BRADY: UNITED AGAINST GUN  
VIOLENCE**

*/s/ Philip Bangle*  
\_\_\_\_\_  
Philip Bangle

*Attorneys for Plaintiffs*

18  
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20  
21  
22 Dated: May 12, 2026

**JACOBSEN McELROY BOOTH & DOLIN  
PC**

*/s/ David Pollock*  
\_\_\_\_\_  
David Pollock

*Attorneys for Defendant Ghost Firearms LLC*

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**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 Defendant Ghost Firearms 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 or by  
Defendant Ghost Firearms 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