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Products, Inc., and Lowe's Home Centers, LLC

### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

DEAN MAURO,

Individually and on behalf of others similarly situated,

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS, INC., AND LOWE'S HOME CENTERS, LLC.,

Defendants.

Case No. 5:17-cv-1397 (TJM/DEP)

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1332, Defendants Electrolux Home Products, Inc. ("Electrolux") and Lowe's Home Centers, LLC ("Lowe's," and together, "Defendants"), by and through their undersigned attorneys, hereby remove this action from the Supreme Court of the State of New York, County of Onondaga, to the United States District Court for the Northern District of New York. In support thereof, Defendants state as follows:

1. On November 20, 2017, Plaintiff Dean Mauro ("Plaintiff") filed a Complaint against Defendants in the Supreme Court of the State of New York, County of Onondaga. Attached hereto as Exhibits A and B, respectively, are true and accurate copies of the Complaint and Summons.

- 2. Electrolux was served with the Complaint and Summons on November 30, 2017.
- 3. Lowe's was served with the Complaint and Summons on November 30, 2017.
- 4. This Notice of Removal is timely because it is being filed within thirty days of service of the Complaint and Summons on Defendants.

### I. This Action Is Removable Pursuant to the Class Action Fairness Act, 28 U.S.C. § 1332(d)(11) ("CAFA")

5. This Court has subject matter jurisdiction pursuant to CAFA, 28 U.S.C. § 1332(d), because (1) the putative class consists of at least 100 proposed class members; (2) the citizenship of at least one putative class member is different from the citizenship of both Defendants; and (3) the aggregate amount placed in controversy by the claims of the named Plaintiff and the proposed class members exceeds the sum or value of \$5,000,000, exclusive of costs and interest.

#### A. The Minimal Diversity of Citizenship Requirement Is Satisfied.

- 6. Under CAFA, 28 U.S.C. § 1332(d)(2)(A), minimal diversity jurisdiction exists if any member of the purported class is a citizen of a state different from any defendant.
  - 7. As alleged in the Complaint, Plaintiff is a citizen of New York. (Ex.  $A \P 9$ ).
- 8. Electrolux is incorporated in Delaware and has its principal place of business in North Carolina. As such, for jurisdictional purposes, Electrolux is a citizen of Delaware and North Carolina.
- 9. Lowe's is incorporated in North Carolina and has its principal place of business in North Carolina. As such, for jurisdictional purposes, Lowe's is a citizen of North Carolina.
- 10. Thus, the minimal diversity of citizenship requirement of 28 U.S.C. § 1332(d)(2)(A) is satisfied because the citizenship of at least one putative class member, Plaintiff, is different than the citizenship of both Defendants.

#### B. The Putative Class Consists of More than 100 Members.

- 11. Plaintiff purports to bring this action pursuant to Article 9 of the CPLR on behalf of a class comprised of "[a]ll persons in the State of New York who purchased a Frigidaire Over-The-Range Microwave with a STAINLESS STEEL HANDLE since December 1, 2013." (Ex. A ¶ 46).
- 12. Plaintiff alleges that the putative class "is so numerous that the joinder of all members is impracticable" but does not allege the exact or approximate number of putative class members. (Id. ¶ 47).
- 13. Plaintiff defines "STAINLESS STEEL HANDLES" as microwave handles bearing part number 5304481502.
- 14. Electrolux sold two over-the-range microwaves in the United States that use a stainless steel handle bearing part number 5304481502: Model No. FGMV175QF and Model No. FGMV154CLF.
- 15. During the putative class period (December 1, 2013 to the present (Ex. A ¶ 46)), Electrolux shipped over 40,000 Model No. FGMV175QF and Model No. FGMV154CLF microwaves to retailers located in New York for sale to consumers. Thus, Electrolux shipped over 40,000 microwaves that use the stainless steel handle bearing part number 5304481502 to retailers located in New York for sale to consumers. <sup>1</sup>
- 16. Based on these and other allegations, the aggregate number of class members in Plaintiff's proposed class is at least 100 for the purposes of satisfying 28 U.S.C. § 1332(d)(5).

<sup>&</sup>lt;sup>1</sup> The United States District Court for the Eastern District of California recently concluded that "[a]s Electrolux does not sell its microwaves directly to consumers, it is reasonable for Electrolux to use sales of microwaves with stainless steel handles to its California retailers as a proxy to estimate how many of such microwaves were purchased by persons in California." *Mendoza et al. v. Electrolux Home Products, Inc.*, 1:17-cv-00839-LJO-SKO, Dkt. No. 47 at 5 (September 20, 2017). A copy of that decision is attached hereto as Exhibit C. Electrolux respectfully suggests that the same rationale should apply in this instance with respect to New York consumers.

#### C. The Amount In Controversy Requirement under CAFA Is Satisfied.

- 17. Plaintiff alleges that over-the-range microwave ovens manufactured by Electrolux are defective because they are manufactured with stainless steel handles that allegedly heat to excessive temperatures when the cooking surface below is in operation. (Ex. A  $\P$  2).
- 18. Plaintiff contends that the alleged defect renders a microwave "unfit for its ordinary purpose." (Id. ¶ 33).
- 19. Based on these allegations, Plaintiff alleges claims against Electrolux for violation of New York General Business Law §§ 349 and 350, negligence, strict liability-design defect and failure to warn, negligent failure to warn, and unjust enrichment. (Ex. A at 14-23).
- 20. Based on these allegations, Plaintiff also alleges claims against Lowe's for strict liability-design defect and failure to warn, violation of the Magnuson-Moss Consumer Products Warranties Act (15 U.S.C. § 2301, *et seq.*), breach of the implied warranty of merchantability, and unjust enrichment. (Ex. A at 16-23).
- 21. Plaintiff seeks, on his own behalf and on behalf of the putative class, the following damages: (1) the greater of actual damages or statutory damages of \$50 per transaction pursuant to GBL § 349(h); (2) costs and attorneys' fees pursuant to GBL § 349; (3) "replacement of the defective handle with a non-defective handle of at least the quality and grade marketed and promised, as well as shipment and installation of the replacement handle," (4) "restitution and/or the institution of a constructive trust disgorging all profits, benefits and other compensation obtained by Defendants, in addition to attorneys' fees, costs, and interest thereon," (5) compensatory damages and/or statutory damages; and (6) pre- and post-judgment interest. (Ex. A ¶ 61, 120, and 124; Ex. A at 23 ¶ B-E).
- 22. Plaintiff alleges that "the retail cost of the handle is approximately \$140.46," and that he purchased his microwave for \$224.10. (Ex. A  $\P$  23, 34).

- 23. Using only the cost of a replacement handle as the measure of damages (\$140.46), the putative class would need to consist of 35,598 individuals for the amount in controversy to exceed \$5,000,000.<sup>2</sup>
- 24. More than 35,598 microwaves that use a stainless steel handle bearing part number 5304481502 were shipped to New York retailers for sale to consumers during the putative class period.
- 25. If Electrolux was ordered to replace the handles on these microwaves, a qualified service technician would need to disassemble the door of each microwave, install the new handle, reassemble and reinstall the microwave door and then inspect the unit to ensure functionality. The average labor cost to Electrolux for such repairs is \$91.
- 26. Using the cost of the replacement handle plus the labor cost to replace the handle as the measure of damages (\$140.46 plus \$91 equals \$231.46), the putative class would need to consist of 21,603 individuals for the amount in controversy to exceed \$5,000,000.<sup>3</sup>
- 27. More than 21,603 microwaves that use a stainless steel handle bearing part number 5304481502 were shipped to New York retailers for sale to consumers during the putative class period.
- 28. Moreover, pursuant to GBL § 350-e(3), a person who alleges that he has been injured by a violation of GBL § 350, as Plaintiff does here, may bring "an action to recover his or her actual damages or five hundred dollars, whichever is greater." N.Y. Gen. Bus. Law § 350-e (McKinney). <sup>4</sup>

<sup>&</sup>lt;sup>2</sup> \$5,000,000 divided by \$140.46 equals 35,597.32.

<sup>&</sup>lt;sup>3</sup> \$5,000,000 divided by \$231.46 equals 21,602.004.

<sup>&</sup>lt;sup>4</sup> \$5,000,000 divided by \$500 equals 10,000.

- 29. Using the \$500 statutory damages available under GBL § 350-e(3), the putative class would need to consist of 10,000 individuals for the amount in controversy to exceed \$5,000,000. *See Andersen v. Walmart Stores, Inc.*, No. 16-CV-6488 CJS, 2017 WL 661188, at \*6 (W.D.N.Y. Feb. 17, 2017) (using the \$500 statutory damages available pursuant to GBL § 350-e(3) to calculate that the putative class would need to consist of 10,000 members to satisfy CAFA's amount in controversy requirement).
- 30. More than 10,000 microwaves that use a stainless steel handle bearing part number 5304481502 were shipped to New York retailers for sale to consumers during the putative class period.
- 31. Thus, for the reasons set forth above, the amount in controversy exceeds \$5,000,000, even if attorneys' fees are excluded from the calculation.
- 32. Because there is minimal diversity between the parties and because the \$5,000,000 amount in controversy requirement is satisfied, this case is properly removed pursuant to CAFA, 28 U.S.C. §§ 1332(d) and 1453.
- 33. A true and correct copy of this Notice of Removal will be filed with the clerk of the Supreme Court of the State of New York, County of Onondaga, and served upon counsel for Plaintiff.
- 34. In filing this Notice of Removal, Defendants do not waive, and specifically reserve, all defenses, exceptions, rights, and motions. No statement herein or omission herefrom shall be deemed to constitute an admission by Defendants of any of the allegations of or damages sought in the Complaint.

WHEREFORE, Defendants respectfully give notice of the removal of the state action referenced herein from the Supreme Court of the State of New York, County of Onondaga, to the United States District Court for the Northern District of New York.

Dated: Newark, New Jersey December 30, 2017

#### **K&L GATES LLP**

Attorneys for Defendants Electrolux Home Products, Inc., and Lowe's Home Centers, LLC

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### EXHIBIT A

FILED: ONONDAGA COUNTY CLERK 11/20/2017 11:46 AM INDEX NO. 006569/2017 NYSCEF DOC. NO. Que 5:17-cv-01397-TJM-DEP Document 1-1 Filed 12/30/17 REGIEVED NATE CONTROL OF THE PROPERTY OF THE PROP

SUPREME COURT OF THE STATE OF NEW	<b>YORK</b>
COUNTY OF ONONDAGA	

DEAN MAURO, :

Individually, and on behalf of all others similarly situated,

**CLASS ACTION COMPLAINT** 

Index No.

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS, INC., LOWE'S HOME CENTERS, LLC,

Defendants. :

#### I. INTRODUCTION

- 1. This is a Complaint brought by Plaintiff Dean Mauro, and those New York consumers who are similarly situated, against Defendant Electrolux Home Products, Inc. ("Electrolux") and Lowe's Home Centers, LLC ("Lowe's") (collectively "Defendants") to redress a defective condition present in Electrolux Over-The-Range Microwave Ovens with stainless steel handles bearing part number 5304481502 (hereinafter "Microwave(s)" with "STAINLESS STEEL HANDLE(S)") that were warranted, advertised, distributed, and sold by Defendants throughout the State of New York.
- 2. The Microwaves are designed for installation on a vertical wall directly above the cooking surface of the range,<sup>1</sup> but when the cooking surface below is in operation the Microwave's STAINLESS STEEL HANDLE heats to excessive temperatures rendering the handle unfit for use with a bare hand and exposing anyone who touches it to a substantial risk of permanent and/or serious injury ("Handle Defect").
  - 3. A photograph of Plaintiff's Microwave is depicted below:

<sup>&</sup>lt;sup>1</sup> See Installation Instructions, attached hereto as Exhibit A at Figure 1.

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FIGURE 1
PLAINTIFF MAURO'S INSTALLED MICROWAVE WITH HANDLE DEFECT

- 4. The American Society of Testing Materials ("ASTM") publishes the Standard Guide for Heated System Surface Conditions that Produce Contact Burn Injuries, known as ASTM Standard C1055-03 (Reapproved 2014) (hereinafter "Standard" or "ASTM C1055-03").<sup>2</sup> This Standard defines the human burn hazard for skin contact "to standardize the determination of acceptable surface operating conditions for heated systems." Ex. B, § 5.2.
- 5. The Standard warns against skin contact with any metal that exceeds 44°C or 111°F, and acknowledges the risk rises exponentially with each degree increase over 44°C. Ex. B, §§ 6.4.2, X1.2.3.3. This is because a temperature of 111°F represents a standard pain

<sup>&</sup>lt;sup>2</sup> See ASTM C1055-03 (Reapproved 2014), attached hereto as Ex. B.

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threshold with maximum bearable pain beginning at 133°F, and the beginning of numbness and possible irreversible injury is at 140°F. Ex. B, Figure X1.2.

- 6. The Standard is clear, however, that "[i]f the surface temperature exceeds 70°C [158°F] and the surface is metallic, it may present a hazard regardless of the contact duration. Attempts should be made to lower the surface temperature below 70°C." Ex. B, § 6.4.2.
- 7. This Handle Defect is unreasonably dangerous and renders the Microwaves' handles unfit to use when opening the Microwave door – its intended and ordinary purpose. As a result of the hollow handle construction comprised of thin walls of stainless steel, the STAINLESS STEEL HANDLES with the Handle Defect heat to temperatures in excess of those permitted under ASTM Standard C1055-03 (Reapproved 2014).
- 8. As a result of this Handle Defect and Defendants' conduct, Plaintiff brings claims for: (i) New York General Business Law §§349, 350; (ii) negligence; (iii) strict liability-design defect and failure to warn; (iv) negligent failure to warn; (v) violations of the Magnuson-Moss Consumer Products Warranties Act, 15 U.S.C. § 2301, et seq. ("MMWA"); (vi) breach of implied warranty of merchantability; and (vii) unjust enrichment. Plaintiff brings suit on behalf of all other similarly situated persons, as set forth below, who have purchased the Microwave.

#### II. **PARTIES**

#### PLAINTIFF DEAN MAURO

- 9. Plaintiff Mauro is an adult individual consumer who is a citizen and resident of Syracuse, New York.
- 10. Plaintiff Mauro is the owner of a Frigidaire Gallery Over-The-Range Microwave Oven, Model No. FGMV175QFA, which contains the Handle Defect.
- 11. Plaintiff Mauro purchased his Microwave from Lowe's in Cicero, New York in December 2014.

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12. Plaintiff Mauro's Microwave was properly installed pursuant to Defendant's installation instructions.

13. Plaintiff Mauro's Microwave handle reaches excessive surface temperature when the range below is in operation rendering the handle unreasonably dangerous and unfit to use when opening the Microwave door – its intended and ordinary purpose.

#### **DEFENDANT ELECTROLUX HOME PRODUCTS, INC.**

- 14. Defendant Electrolux is, upon information and belief, a Delaware corporation that can be served with process at its principal place of business located at 10200 David Taylor Dr., Charlotte, NC 28262.
- 15. Defendant distributes its products under a variety of brand names, including Electrolux, Electrolux ICON, Frigidaire Professional, Frigidaire Gallery, Frigidaire, Eureka, Kelvinator, Sanitaire, Tappan, and White-Westinghouse. *See*<a href="http://www.electroluxappliances.com/About-Electrolux/About-US/">http://www.electroluxappliances.com/About-Electrolux/About-US/</a> (last visited November 7, 2017).
- 16. Upon information and belief, at all times relevant, Electrolux was engaged in the business of distributing the Microwaves throughout the United States, including in the State of New York.

#### DEFENDANT LOWE'S HOME CENTERS, LLC

17. Defendant Lowe's is a North Carolina corporation with its principal place of business located at 1605 Curtis Bridge Road, Wilkesboro, North Carolina. Lowe's is a wholly owned subsidiary of Lowe's Companies, Inc. Lowe's Companies, Inc. purports to be the nation's second largest home improvement store and conducts business throughout New York and the United States, including in the County of Onondaga. Defendant Lowe's operates home improvement stores and retails appliances, tools, paints, lumber, and nursery products.

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III. JURISDICTION AND VENUE

18. This Court has jurisdiction over Defendant pursuant to subsections 1 through 3 of CPLR § 302(a) because Defendants (1) transact business within New York or contract both within and without New York to supply goods or services within the state; (2) committed aspects of the tortious acts within New York as alleged herein; and (3) committed tortious acts without the state of New York as alleged herein, and regularly do sufficient business in New York, have sufficient minimum contacts with New York, and otherwise intentionally avail themselves of the markets in New York through the purchase of services and the promotion, marketing, sale and distribution of its products in New York to render the exercise of jurisdiction by the New York Courts permissible under traditional notions of fair play and substantial justice.

19. Venue is proper in this Court because Plaintiff resides in Onondaga County.CPLR § 503.

#### IV. FACTUAL ALLEGATIONS

#### A. The Microwave is Defective

- 20. For almost one-hundred years, Defendant Electrolux has designed, manufactured, assembled, sold, and otherwise placed into the stream of commerce a wide range of home appliances. Defendant Electrolux sells its Microwaves to consumers throughout the United States through authorized retailers, including but not limited to, the Defendant Lowe's.
- 21. The Microwave is designed, manufactured, and intended to be used "over-the-range." *See e.g.*, Ex. D (Specifications Sheet). The Microwave is to be installed directly over the cooking surface, as shown below:

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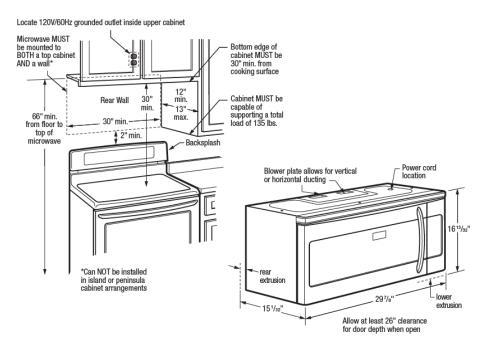


FIGURE 2
INSTALLATION SPECIFICATIONS

- 22. The Microwaves have been designed, manufactured, and intended to be used with a unique "Handle Design" manufactured from stainless steel. *See id.* The Microwaves' handles inflicted with the Handle Defect are readily identifiable by part number: 5304481502 ("STAINLESS STEEL HANDLES").
- 23. At the time of filing of this Complaint, the retail cost of the handle is approximately \$140.46.
- 24. The intended use of the Microwave's STAINLESS STEEL HANDLE is to access the appliance for use, and is the only way to open the Microwave door. The STAINLESS STEEL HANDLE is designed for use with a bare hand, and a consumer's reasonable expectation is that the handle to the Microwave can be touched without risk of burning or other serious injury.
- 25. The Microwaves' STAINLESS STEEL HANDLES with the Handle Defect fail to conform to the governing standards in the United States for preventing consumers' exposure to

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burn injuries.

- 26. ASTM C1055-03 is a design guide for the determination of acceptable surface operating conditions to prevent contact with exposed heated surfaces. *See* Ex. B, §1.1. The Standard is designed to "establish the maximum operating surface temperature under the worst case conditions." Ex. B, §6.3.
- 27. The Standard describes thermal sensations and tissue effects of skin contact with metallic surfaces. A temperature of 111°F represents a pain threshold, painful to the touch, and maximum bearable pain begins at 133°F. This pain threshold is adopted by Underwriters' Laboratories, Inc. ("UL") 923 stating the temperature of a metal handle or knob cannot exceed 131°F. *See* UL 923, Section 42.3, Table 42.2. While Defendant Electrolux represents compliance with UL standards, no testing was ever done to identify, address, or prevent the Handle Defect.
- 28. But the Standard is likewise clear that "[i]f the surface temperature exceeds 70°C [158°F] and the surface is metallic, it may present a hazard regardless of the contact duration.

  Attempts should be made to lower the surface temperature below 70°C." Ex. B, § 6.4.2.
- 29. This Standard establishes a range of injury to skin that contacts metallic surfaces at identified temperatures:

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Sensation	Skin Color	Tissue Temperature		1 52 50	
		°C	°F	Process	Injury
Numbness	White	68-72	154-162	Protein Coagulation	Irreversible
	Mottled Red & White	60-64	140 - 147	Thermal inactivation	Possibly Reversible
Maximum Pain	Bright Red	52-56	126-133		
Severe Pain	Light Red	48	118	of Tissue Contents	Reversible
Threshold Pain		40-44	104-111		
Hot	Flushed	20.40	07.404	Normal	
Warm		36-40	97-104	metabolism	None

FIGURE 3
ASTM C1055-03 (2014), Fig. X1.2 THERMAL SENSATIONS AND ASSOCIATED EFFECTS THROUGHOUT RANGE OF TEMPERATURES COMPATIBLE WITH TISSUE LIFE

- 30. In addition, according to the New York City Administrative Code, "[a]ll accessible piping in habitable and occupiable rooms carrying steam, water, or other fluids at temperatures exceeding one hundred sixty-five degrees Fahrenheit shall be insulated to prevent the temperature at the outer surface of the insulation from exceeding sixty degrees Fahrenheit above the ambient temperature." N.Y. Code § 27-809 (emphasis added).
- 31. New York City comprises over two-fifths of New York State's entire population, and therefore, New York City residents constitute a substantial portion of the New York state class. *See* <a href="https://www1.nyc.gov/site/planning/data-maps/nyc-population/population-facts.page">https://www1.nyc.gov/site/planning/data-maps/nyc-population/population-facts.page</a> (last visited on November 7, 2017).
- 32. When the cooking range is in use below the Microwave, however, these STAINLESS STEEL HANDLES reach temperatures that exceed all applicable standards because of the Handle Defect. This occurs because the handles are hollow and manufactured from walls of stainless steel that are too thin and lacking in any insulating feature to protect against the heat emanating from the range below.
  - 33. Defendants have not provided any warnings, instructions, or visible indicators that

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the handle becomes hot with the operation of the cooking surface below making it unfit for its ordinary purpose, and may cause serious burns or other injuries to a user thereby presenting a defective condition that is unreasonable to the user.

#### B. The Defective Microwave Caused Plaintiff's Injury

- 34. Plaintiff Mauro's Microwave was purchased from Lowe's Home Centers, LLC in Cicero, New York on December 3, 2014 for \$224.10, excluding tax.
- 35. Thereafter, Plaintiff Mauro installed his Microwave over his cooking range, as depicted in the photograph above, in accordance with the Installation Instructions for the Microwave, which were provided by Defendant Electrolux. *See* Ex. A. (Installation Instructions).
- 36. At all relevant times hereto, Plaintiff Mauro has had a conventional-size cooking range that is also sold by Electrolux under the same brand as his Microwave: Frigidaire Gallery.
- 37. While cooking on his stove, Plaintiff reached for the handle of his Microwave to open it.
- 38. As a result of Plaintiff's brief contact with the handle of his Microwave, he discovered the exceedingly high temperature of that handle.

#### C. Defendant Electrolux's Knowledge of the Handle Defect

- 39. Based on the design or manufacture of the Microwave, the Handle Defect causes the handles of the Microwaves to reach temperatures that cause the handle to be unfit for its ordinary purpose, and may cause serious burns or other injuries to a user thereby presenting a defective condition that is unreasonable to the user.
- 40. Defendant Electrolux's choice of stainless steel for the handle, rather than an alternative metal such as aluminum, combined with its hollow construction with thin walls rather

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than solid construction causes the exterior of the Microwave handle to reach temperatures that create a substantial risk of harm to consumers when the cooking range is in use below the Microwave.

- 41. Plaintiff is informed, believes, and thereon alleges that Defendant Electrolux has had constructive and actual knowledge of the Handle Defect through numerous consumer complaints made directly to Defendant Electrolux or through online communications and complaints of consumers at large.
- 42. Plaintiff is informed and believes that Defendant Electrolux acknowledged internally that the Handle Defect caused injuries and burns to consumers.
- 43. Despite having repeated notice of the Handle Defect, its effects, and consumers' reasonable expectation of using the handle to open the Microwave door when the cooking range is in use, Defendant Electrolux has engaged and continues to engage in the following wrongful course of conduct, where it:
  - Designs, manufactures, markets, advertises, and sells the Microwave with a
     Handle Defect that causes burns and other injuries;
  - Fails to disclose at the time of purchase that the Microwave has a Handle
     Defect that causes burns and other injuries;
  - c. Continues to represent on Microwave packaging that the Microwave is of a quality and fitness that it is not;
  - d. Continues to represent expressly or by necessary implication that the Microwave is dependable and fit to use in consumer's households when it knows these statements are false because the Microwave contains a Handle Defect:
  - e. Continues to manufacture, market, advertise, distribute, and sell the Microwave when it knows that the Microwave is defective and unsafe;

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f. Fails to disclose the risk that to a substantial certainty, the Microwave will cause burns or other injuries when used as instructed by its Use & Care Guide;

- g. Fails to disclose to consumers the Handle Defect; and
- h. Fails to implement a recall or repair program to adequately announce to Plaintiff and Class Members the existence of the Handle Defect, and provide, without charge, a solution to remedy and correct the Handle Defect.
- 44. Had Plaintiff known of the Handle Defect in the Microwave and the substantial risk of burns resulting from use of the Microwave, Plaintiff would not have installed his Microwave.

#### V. CLASS ACTION ALLEGATIONS

- 45. This action is brought as, and may properly be maintained as, a class action under the provisions of Article 9 of the CPLR.
  - 46. The putative Class is defined as:

All persons in the State of New York who purchased a Frigidaire Over-The-Range Microwave with a STAINLESS STEEL HANDLE since December 1, 2013. Excluded from the Class are officers, representatives, or agents of Defendants, as well as the judge presiding over this case and his or her immediate family members.

#### **Numerosity**

47. Although the exact number of Class Members is uncertain, and can only be ascertained through appropriate discovery, including discovery of Defendant Lowe's sales records, the Class is so numerous that the joinder of all members is impracticable. The Class is comprised of an easily ascertainable, self-identifying set of persons who purchased the Microwaves with the Handle Defect.

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#### Commonality

48. There are numerous questions of law and fact common to Plaintiff and the Class Members, including the following:

- a. Whether Defendants engaged in the conduct as alleged herein;
- b. Whether the Microwaves at issue in this lawsuit are defective;
- c. Whether Defendants knew or should have known of the inherent Handle Defect in the Microwave;
- d. Whether Defendants represented that its Microwaves were of a particular standard, quality, or grade when they were not and/or when Defendant knew or should have known that they were of another standard, quality, or grade;
- e. Whether Defendants fraudulently concealed from and/or failed to disclose to Plaintiff and the Class the inherent problems with its Microwave;
- f. Whether Defendants had a duty to Plaintiff and the Class to disclose the inherent Handle Defects in its Microwave;
- g. Whether the facts Defendants misrepresented, concealed, or failed to disclose were material;
- h. Whether as a result of Defendants' concealment of and/or failure to disclose material facts, Plaintiff and the Class acted to their detriment by purchasing the Microwave;
- i. Whether Defendants should be declared financially responsible for notifying all Class Members of the problems with its Microwave and for the cost and expense of repairing and replacing all such Microwaves or replacing its defective STAINLESS STEEL HANDLE;
- j. Whether the Microwave is covered by implied warranty of merchantability; and
- k. Whether Plaintiff and the Class Members are entitled to damages, and the amount of such damages.
- 49. The questions of law and fact common to Plaintiff and the Class Members that predominate over any questions which may affect only individual members.

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**Typicality** 

50. Plaintiff's claims are typical of the claims of the Class Members in that Plaintiff, like all Class Members, owns a defective Microwave, and has been damaged by Defendants' uniform misconduct.

51. Furthermore, the factual bases of Defendants' misconduct are common to all Class Members and represent a common thread of misconduct resulting in injury to all members of the Class.

#### Fair and Adequate Representation

52. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff has retained counsel who are experienced in consumer class-action litigation. Plaintiff has no interests which are adverse to, or in conflict with, other members of the Class.

#### Superiority

- 53. A class action is superior to other available methods for the fair and efficient adjudication of the controversy. Class treatment of common questions of law and fact is superior to multiple individual actions or piecemeal litigation. Moreover, absent a class action, most Class Members would likely find the cost of litigating their claims prohibitively high and would therefore have no effective remedy at law.
- 54. The prosecution of separate actions by the individual Class Members would create a risk of inconsistent or varying adjudications with respect to individual Class Members, which would establish incompatible standards of conduct for Defendants. In contrast, a class action presents far fewer management difficulties, conserves judicial as well as the parties' resources, and protects the rights of each Class Member.

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#### VI. CAUSES OF ACTION

### FIRST CAUSE OF ACTION New York General Business Law §§ 349, 350 [Against Defendant Electrolux]

- 55. Plaintiff hereby incorporates by reference the allegations contained in the preceding paragraphs of this Complaint.
- 56. Plaintiff asserts this claim against Defendant Electrolux on behalf of himself and all members of the putative Class.
- 57. At all times relevant, the New York General Business Law § 349 and § 350 prohibit "deceptive acts and practices" and "false advertising," and declare such acts or practices as unlawful.
- 58. Defendant Electrolux violated these provisions by the use of deceptive, false, and misleading misrepresentations or omissions of material fact in connection with the marketing, promotion, and sale of the Microwaves with the Handle Defect. Defendant Electrolux communicated the purported benefits of the Microwave while failing to disclose the serious potential of injury related to the use of the Microwave when the range below is in use, with the intent that consumers like Plaintiff and members of the Class rely upon the omissions and misrepresentations and use the Microwave in connection with the range underneath. According to the Installation Instructions, Use & Care Guide, and Specification Sheet for the Microwave, Defendant Electrolux promoted the Microwave as an "Over The Range Microwave Oven." Ex. A at p. 1, Ex. C (Use & Care Guide) at p. 10, Ex. D (Specification Sheet) at p. 1. These are all available to consumers online at https://www.frigidaire.com/Owner-Center/Product-Support--Manuals/?productCode=FGMV175QF (last visited on Nov. 10, 2017). However, as a result of the Handle Defect, the STAINLESS STEEL HANDLE of the Microwaves could not be safely contacted with a bare hand when the range below is in use.

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59. Defendant Electrolux intended that consumers like Plaintiff and members of the Class rely on its deceptive, false and misleading misrepresentations or omissions of material fact in order to increase its sales and profit of the Microwaves.

- 60. As a result of its deceptive marketing, Defendant Electrolux caused Plaintiff and the Class members suffered injury.
- 61. As a direct and proximate result of Defendant Electrolux's violations of GBL § 349 and § 350, Plaintiff and the Class Members have suffered damages, for which they are entitled to relief under § 349(h) that permits recovery of "actual damages or fifty dollars, whichever is greater [per transaction]", and to costs and reasonable attorneys' fees.

# SECOND CAUSE OF ACTION Negligence [Against Defendant Electrolux]

- 62. Plaintiff hereby incorporates by reference the allegations contained in the preceding paragraphs of this Complaint.
- 63. Plaintiff asserts this claim against Defendant Electrolux on behalf of himself and all members of the putative Class.
- 64. Defendant Electrolux sold and/or distributed defective Microwaves to Plaintiff and the Class.
- 65. At all times relevant to this action, Defendant Electrolux had a duty to exercise reasonable care over Microwaves it sold, including a duty to ensure that their Microwaves did not pose a significantly increased or unreasonable risk of injury to consumers.
- 66. Notwithstanding, Defendant Electrolux breached this duty by selling the Microwaves with the Handle Defect that present a risk of, and clearly identified, risk of serious personal injury to Plaintiff and Class Members expressly recognized by the objective

temperature standard of 158°F of ASTM C1055-03 for metallic surfaces that cause severe and irreversible injury. The Handle Defect causes the Microwaves' STAINLESS STEEL HANDLES to exceed this temperature under normal operating conditions.

- 67. Defendant Electrolux knew or should have known that the Microwaves had a propensity to cause serious injuries as set forth herein.
- 68. Defendant Electrolux knew or should have known that consumers who purchased the Microwaves, including Plaintiff and Class Members, could foreseeably suffer injuries as to themselves as a result of its failure to exercise reasonable care as described above.
- 69. Defendant Electrolux breached its duty of reasonable care to Plaintiff and Class Members so as to render the Microwaves defective and reasonably certain to be dangerous.
- 70. As a direct and proximate result of Defendant Electrolux's acts and omissions, including its failure to exercise reasonable care in the design, manufacture, sale and distribution of the Microwaves, Plaintiff and the Class Members suffered loss or damage.

# THIRD CAUSE OF ACTION Strict Liability-Design Defect and Failure to Warn [Against All Defendants]

- 71. Plaintiff hereby incorporates by reference the allegations contained in the preceding paragraphs of this Complaint.
- 72. Plaintiff asserts this claim on behalf of himself and all members of the putative Class.
- 73. Defendants are engaged in the business of selling Microwaves, including those with the Handle Defect.
  - 74. The Microwaves were used for the purpose and in the manner normally intended.
  - 75. The Microwaves with the Handle Defect sold by Defendant Lowe's reached

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Plaintiff and members of the Class without any substantial change in their condition.

76. An otherwise safe product can be deemed "defective" for strict liability purposes if, upon normal use, the product is dangerous beyond the reasonable consumer's contemplations ("consumer expectations standard"), or if a reasonable person would conclude that the probability and seriousness of harm caused by the product outweigh the burden or costs of taking precautions ("risk-utility analysis").

- 77. Under both the consumer expectations standard and the risk-utility analysis, the Microwaves are defective because of the Handle Defect.
- 78. The Microwaves with the Handle Defect failed to meet an ordinary consumer's minimum safety expectations of an over-the-range microwave.
- 79. The risks associated with use of the Microwaves' STAINLESS STEEL HANDLES with the Handle Defect outweigh any aesthetic or functional benefits and any utility to the public or undisclosed precaution.
- 80. The Microwave STAINLESS STEEL HANDLES expose Plaintiff and the Class Members to an unreasonably dangerous condition and temperatures known to cause permanent burn injuries.
- 81. Because of the Handle Defect, the Microwaves' STAINLESS STEEL HANDLES reach temperatures beyond the recommended maximum to expose a user to pain of 111°F (44°C), the maximum pain tolerance of 133°F (56°C), the point where injury occurs 140°F (60°C), and finally beyond the point of irreversible permanent skin damage 158°F (70°C). The Microwave does not perform as safely as an ordinary consumer would have expected an over the range microwave to perform when used in a reasonably foreseeable way and/or the manner in which it was intended by Defendants. Further, it was intended, and is reasonably foreseeable, that

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a consumer would use the handle of the Microwave while the cooking range was in use below as it is the only means to open the door to the appliance.

- 82. Consumers cannot adjust or prevent the handle of the Microwave from conducting heat from when the cooking range is in use below.
- 83. There are no visible heat indicators or warnings regarding the external surface temperature of the Microwave handle.
- 84. In other words, ordinary consumers would not have recognized the potential risks of serious burns or other injury based on the exterior appearance of the Microwave.
  - 85. The Microwaves, as designed, posed a substantial likelihood of harm.
- 86. The Handle Defect renders the Microwave unreasonably dangerous and unable to perform as an ordinary consumer would expect.
- 87. It was feasible to design the Microwaves in a safer manner. The use of aluminum, thicker material, insulated core, or any combination of these alternatives would eliminate the Handle Defect.
- 88. Defendants failed to warn Plaintiff and the Class of the risk for injury caused by using the Microwaves STAINLESS STEEL HANDLES with the Handle Defect. Defendants also failed to ensure that these handles on the Microwave it sold were safe for their intended purpose and users.
- 89. Defendant Electrolux failed to warn in the Microwave's Use & Care Guide, and all other documents accompanying the Microwave, about the risk regarding the unreasonably high external surface temperature of the handle when the cooking range in is use below.
- 90. As a direct and proximate result of the Handle Defect put into the stream of commerce by Defendants, and/or its failure to warn of the risks of use thereof, Plaintiff and

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putative Class Members have been injured and have suffered damages.

91. Thus, Defendants are strictly liable for all injuries suffered by Plaintiff and the Class Members as a result of the Handle Defect.

# FOURTH CAUSE OF ACTION Negligent Failure to Warn [Against Defendant Electrolux]

- 92. Plaintiff hereby incorporates by reference the allegations contained in the preceding paragraphs of this Complaint.
- 93. Plaintiff asserts this claim on behalf of himself and all members of the putative Class.
- 94. Defendant Electrolux sold, and/or distributed defective Microwaves to Plaintiff and the Class, and prepared all warnings for the Microwaves.
- 95. Defendant Electrolux failed to provide any warning of the danger or instruct Plaintiff and the Class on the safe use of the Microwave, rendering the Microwave unreasonably dangerous because of the Handle Defect.
- 96. Defendant Electrolux knew or reasonably should have known that its Microwaves were defective and dangerous and/or were likely to be dangerous when used in a reasonably foreseeable manner.
- 97. Defendant Electrolux knew or reasonably should have known that Plaintiff and the Class could not detect or realize the Handle Defect, and that it posed a danger to Plaintiff and other consumers.
- 98. A reasonable manufacturer, distributor, assembler, or seller under the same or similar circumstances would have warned of the danger or instructed on the safe use of the over the range microwave, including but not limited to, providing detailed instructions for safe use of

the Microwaves together with warnings regarding the risk of harm from contact with the STAINLESS STEEL HANDLE of the Microwave when the cooking range is in use below.

- 99. Defendant Electrolux had a duty to Plaintiff and the Class to use reasonable care to warn consumers about the risks and dangers regarding the use of the Microwave, or facts that made said Microwave likely to be dangerous, and of which Defendant Electrolux knew or reasonably should have known.
  - 100. Defendant Electrolux breached this duty.
- 101. As a direct and proximate result of Defendant Electrolux's breach, Plaintiff and other members of the Class have been injured.
- 102. Defendant Electrolux's failure to warn or instruct Plaintiff and the Class was a substantial factor in causing their harm.
- 103. As a direct, proximate, and foreseeable result of Defendant Electrolux's negligence, Plaintiff and putative Class Members have been damaged in the aggregate, in an amount to be determined at trial.

#### FIFTH CAUSE OF ACTION

#### Violation of Magnuson-Moss Consumer Products Warranties Act, 15 U.S.C. § 2301, et seq. ("MMWA") [Against Defendant Lowe's]

- 104. Plaintiff hereby incorporates by reference the allegations contained in the preceding paragraphs of this Complaint.
- 105. The MMWA provides a private right of action by purchasers of consumer products against retailers who, *inter alia*, fail to comply with the terms of an implied or written warranty. 15 U.S.C. § 2310(d)(1). As alleged above, Defendant Lowe's has failed to comply with its implied warranty of merchantability with regard to its Microwave.
  - 106. Microwaves are consumer products, as that term is defined in 15 U.S.C. §

2301(a).

- 107. Defendant Lowe's is a warrantor, as that term is defined in 15 U.S.C. § 2301(5).
- 108. Plaintiff and each member of the Class are consumers, as that term is defined in 15 U.S.C. § 2301(3).
- 109. The MMWA provides a cause of action for breach of warranty or other violations of the Act. 15 U.S.C. § 2310(d)(1). Defendant Lowe's has breached its implied warranty of merchantability, as alleged herein, which it cannot disclaim under the MMWA, 15 U.S.C. § 2308(a)(1), by failing to provide merchantable goods. Plaintiff has suffered damages as a result of Defendant Lowe's breach of its implied warranty of merchantability as set forth herein. 15 U.S.C. § 2310(d)(1)-(2).
- 110. Defendant Lowe's was provided notice of the breach of warranty claims raised by Plaintiff, and was afforded a reasonable opportunity to cure. Defendant Lowe's never cured. Until Plaintiff's representative capacity is determined, notice and opportunity to cure through Plaintiff, and on behalf of the Class, can be provided under 15 U.S.C. § 2310(e).
- 111. Defendant Lowe's acts and omissions in violation of the MMWA are "[u]nfair methods of competition in or affecting commerce, and unfair or deceptive acts or practices in or affecting commerce," and they are unlawful. 15 U.S.C. § 2310(b); 15 U.S.C. § 45(a)(1).
- 112. Plaintiff and the Class Members have suffered, and are entitled to recover, damages as a result of Defendant Lowe's breach of implied warranty and violations of the MMWA.
- 113. Plaintiff also seeks an award of costs and expenses, including attorneys' fees, under the MMWA to prevailing consumers in connection with the commencement and prosecution of this action. 15 U.S.C. § 2310(d)(2). Plaintiff and the prospective Class intend to

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seek such an award, including expert witness costs and other recoverable costs, as prevailing consumers at the conclusion of this lawsuit.

# SIXTH CAUSE OF ACTION Breach of Implied Warranty of Merchantability [Against Defendant Lowe's]

- 114. Plaintiff hereby incorporates by reference the allegations contained in the preceding paragraphs of this Complaint.
- 115. Defendant Lowe's is a merchant who sold Microwave to Plaintiff and members of the Class.
- 116. Defendant Lowe's, as the seller of the Microwave, impliedly warranted to Plaintiff and members of the Class that the Microwaves were free of defects, and was merchantable and fit for the ordinary purpose for which such goods are used.
- 117. As alleged herein, Defendant Lowe's breached the implied warranty of merchantability because the Microwaves uniformly possess the unsafe Handle Defect or defects. The Microwaves are therefore defective, unmerchantable, and unfit for the ordinary, intended purpose at the time of sale.
- 118. After Plaintiff was made aware of the Handle Defect, they gave reasonable and adequate notice to Defendant Lowe's that the Microwaves were defective, unmerchantable, and unfit for their intended use or purpose. Defendant Lowe's failed to cure.
- 119. Plaintiff did not receive or otherwise have the opportunity to review, at or before the time of sale, the written warranty containing the purported exclusions and limitations of remedies. Accordingly, any such exclusions and limitations of remedies are unconscionable and unenforceable, and Plaintiff is entitled to all remedies available under Article 2 of the New York Uniform Commercial Code. Any purported warranty disclaimers, exclusions, and limitations

were unconscionable and unenforceable.

120. As a direct and proximate result of the breach of implied warranty, Plaintiff and Class Members have been injured in an amount to be proven at trial, including replacement of the defective handle with a non-defective handle of at least the quality and grade marketed and promised, as well as shipment and installation of the replacement handle.

# SEVENTH CAUSE OF ACTION Unjust Enrichment [Against All Defendants]

- 121. Plaintiff hereby incorporates by reference the allegations contained in the preceding paragraphs of this Complaint.
- 122. Defendants received monies for the purchases of Plaintiff's and Class Members' Microwaves, and Defendants were enriched at the expense of Plaintiff and Class Members.
- 123. As a result of the Handle Defect, it is against equity and good conscience to permit Defendants to retain the full value of the Microwaves.
- 124. As a result of Defendants' unjust enrichment, Plaintiff and the Class Members are entitled to restitution and/or the institution of a constructive trust disgorging all profits, benefits, and other compensation obtained by Defendants, in addition to attorneys' fees, costs, and interest thereon.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of all others similarly situated, requests a judgment against Defendants, as follows:

- A. For an order certifying the Class, appointing Plaintiff as representative of the Class, and designating the undersigned as Class Counsel;
  - B. For compensatory and/or statutory damages sustained by Plaintiff and the Class;
  - C. For payment of costs of suit herein incurred;

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D. For both pre-judgment and post-judgment interest on any amounts awarded;

- E. For payment of reasonable attorneys' fees, expert fees, and expenses, as may be allowable under applicable law; and
  - F. For such other and further relief as the Court may deem just and proper.

#### **DEMAND FOR JURY TRIAL**

Plaintiff, individually and on behalf of the Class, demand a trial by jury as to all issues so triable.

DATE: November 20, 2017 BY: /s/ Jason Zweig

Jason Zweig

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**Attorneys for Plaintiff and Proposed Class** 

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# **EXHIBIT A**

INDEX NO. 006569/2017

### Installation Instructions

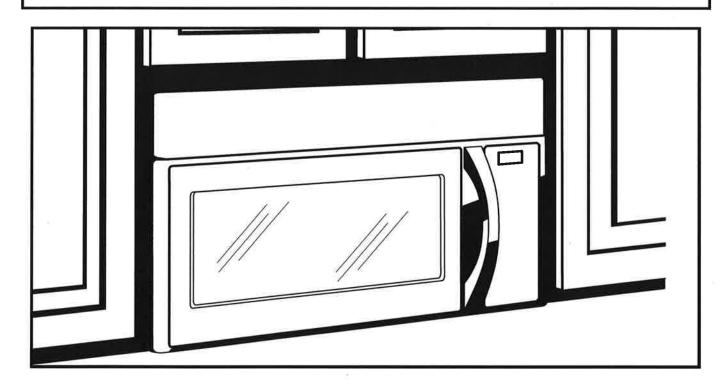
### Over the Range Microwave Oven

1-800-944-9044(US) or 1-800-265-8352(Canada)

#### **BEFORE YOU BEGIN**

Read these instructions completely and carefully.

- **IMPORTANT** Save these instructions for local inspector's use.
- **IMPORTANT** Observe all governing codes and ordinances.
- Note to Installer Be sure to leave these instructions with the Consumer.
- Note to Consumer Keep these instructions for future reference.
- Skill level Installation of this appliance requires basic mechanical and electrical skills.
- Proper installation is the responsibility of the installer.
- Product failure due to improper installation is not covered under the Warranty.



READ CAREFULLY. KEEP THESE INSTRUCTIONS.

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### **Installation Instructions**

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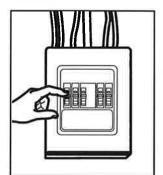
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## Installation Instructions

#### IMPORTANT SAFETY INSTRUCTIONS

This product requires a three-prong grounded outlet. The installer must perform a ground continuity check on the power outlet box before beginning the installation to ensure that the outlet box is properly grounded. If not properly grounded, or if the outlet box does not meet electrical requirements noted (under ELECTRICAL REQUIREMENTS), a qualified electrician should be employed to correct any deficiencies.

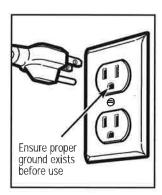


CAUTION: For personal safety, remove house fuse or open circuit breaker before beginning installation to avoid severe or fatal shock injury.

CAUTION: For personal safety, the mounting surface must be capable of supporting the cabinet load, in addition to the added weight of this 63-85 pound (28.5-38.5 kg) product, plus additional oven loads of up to 50 pounds (22.7 kg) or a total weight of 113-135 pounds (51.3-61.2 kg).

CAUTION: For personal safety, this product cannot be installed in cabinet arrangements such as an island or a peninsula. It must be mounted to BOTH a top cabinet AND a wall.

NOTE: For easier installation and personal safety, it is recommended that two people install this product. IMPORTANT - PLEASE READ CAREFULLY. FOR PERSONAL SAFETY, THIS APPLIANCE MUST BE PROPERLY GROUNDED TO AVOID SEVERE OR FATAL SHOCK.



The power cord of this appliance is equipped with a three-prong (grounding) plug which mates with a standard three-prong (grounding) wall receptacle to minimize the possibility of electric shock hazard from this appliance.

You should have the wall receptacle and circuit checked by a qualified electrician to make sure the receptacle is properly grounded.

Where a standard two-prong wall receptacle is encountered, it is very important to have it replaced with a properly grounded three-prong wall receptacle, installed by a qualified electrician.

DO NOT, UNDER ANY CIRCUMSTANCES, CUT, **DEFORM OR REMOVE ANY OF THE PRONGS** FROM THE POWER CORD. DO NOT USE WITH AN EXTENSION CORD.

## **ELECTRICAL** REQUIREMENTS

Product rating is 120 volts AC, 60 Hertz, 15 amps and 1.6 kilowatts. This product must be connected to a seperate and dedicated supply circuit of the proper voltage and frequency. Wire size must conform to the requirements of the National Electrical Code or the prevailing local code for this kilowatt rating. The power supply cord and plug should be brought to a seperate and dedicated 15- to 20- ampere branch circuit single grounded outlet. The outlet box should be located in the cabinet above the microwave oven. The outler box and supply circuit should be installed by a qualifed electrician and conform to the National Electrical Code or the prevailing local code.

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# **Installation Instructions**

# **DAMAGE—SHIPMENT/ INSTALLATION**

- If the unit is damaged in shipment, return the unit to the store in which it was bought for repair or replacement.
- If the unit is damaged by the customer, repair or replacement is the responsibility of the customer.
- If the unit is damaged by the installer (if other than the customer), repair or replacement must be made by arrangement between customer and installer.

### PARTS INCLUDED

#### HARDWARE PACKET

PART		QUANTITY
1	Wood Screws (¼" x 2")	2
0	Toggle Bolts (and wing nuts) (3/16" x 3")	2
1	Self-Aligning Machine Screws (¼"-28 x 3¼")	3
	Nylon Grommet (for metal cabinets)	1

You will find the installation hardware contained in a packet with the unit. Check to make sure you have all these parts.

**NOTE:** Some extra parts are included.

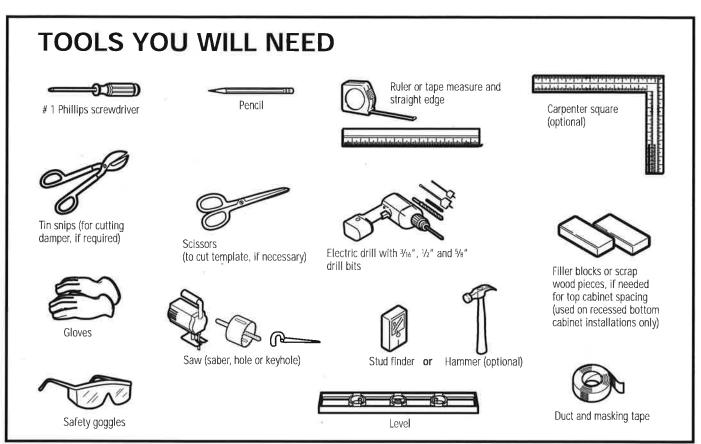
# PARTS INCLUDED (CONT.) ADDITIONAL PARTS

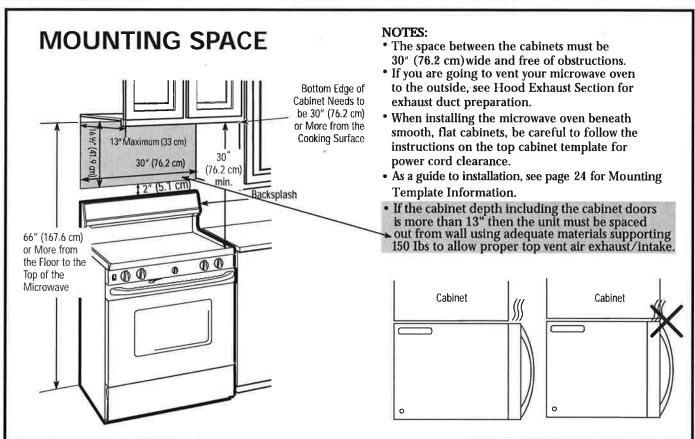
PART	QUANTITY	
	Top Cabinet Template	1
	Rear Wall Template	1
INSTALLATION USE & CARE MANUAL	Installation Instructions	1
	Use & Care Manual	1
	Separately Packed Grease Filters	2
	Exhaust adaptor	1
	Glass Tray	1
	Turntable Ring	1
For some models	Convection wire rack	1
For some models	Shelf	1
For some models	PureAir <b>®</b> Microwave Filter	1

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# **Installation Instructions**

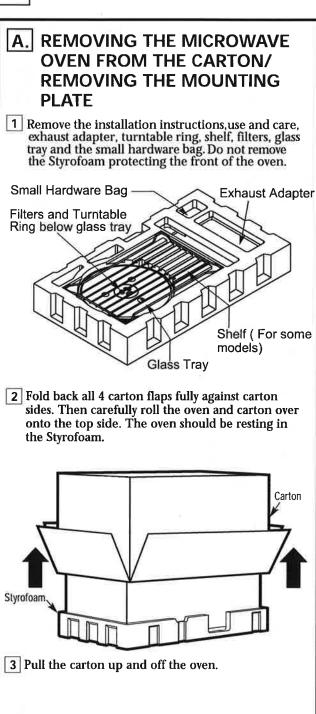


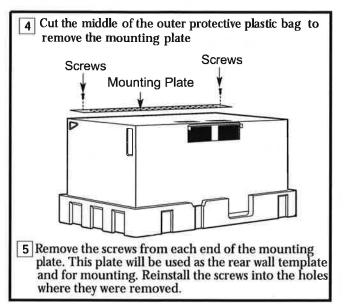


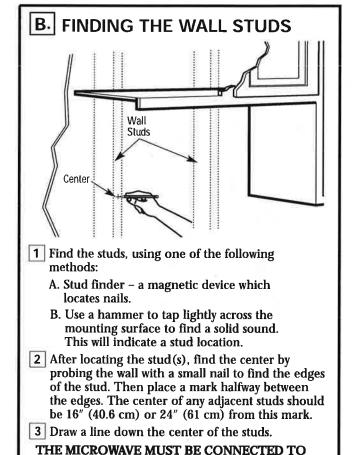
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# Installation Instructions

# PLACEMENT OF THE MOUNTING PLATE





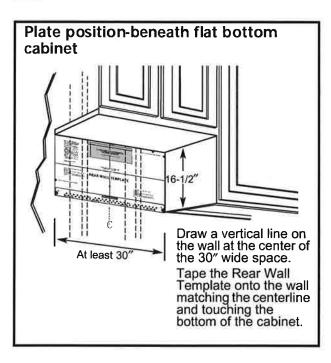


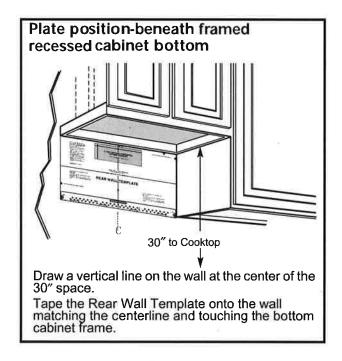
AT LEAST ONE WALL STUD.

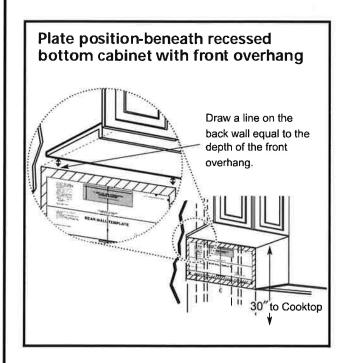
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# **Installation Instructions**

#### C. DETERMINING WALL PLATE LOCATION UNDER YOUR CABINET







Your cabinets may have decorative trim that interferes with the microwave installation. Remove the decorative trim to install the microwave properly and to make it level.

#### THE MICROWAVE MUST BE LEVEL.

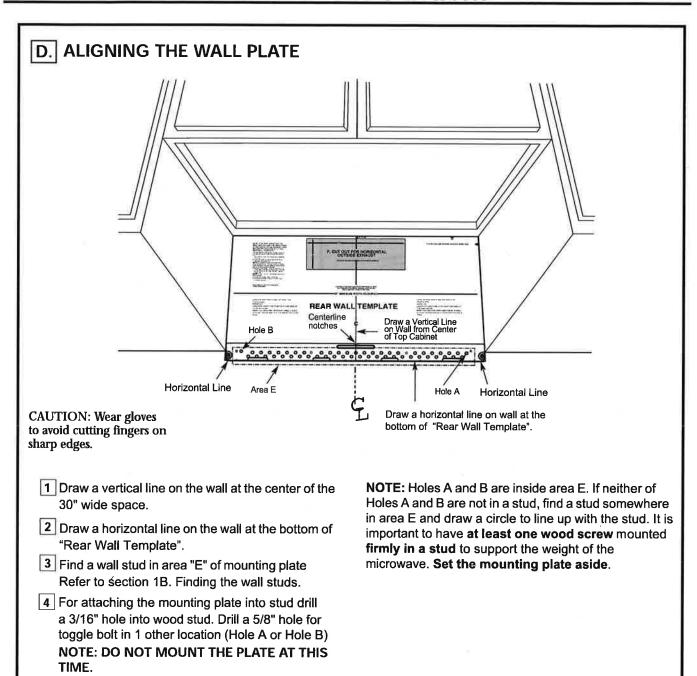
Use a level to make sure the cabinet bottom is level. If the cabinets have a front overhang only, with no back or side frame, install the mounting plate down the same distance as the front overhang depth. This will keep the microwave level.

- 1 Measure the inside depth of the front overhang.
- 2 Draw a horizontal line on the back wall an equal distance below the cabinet bottom as the inside depth of the front overhang.
- 3 For this type of installation with front overhang only, align the mounting tabs with this horizontal line, not touching the cabinet bottom as described in Step D.

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# **Installation Instructions**



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NYSCEF DOC. NO Case 5:17-cv-01397-TJM-DEP Document 1-1 Filed 12/30/17 Rega 3600 1522 : 11/20/2017

# **Installation Instructions**

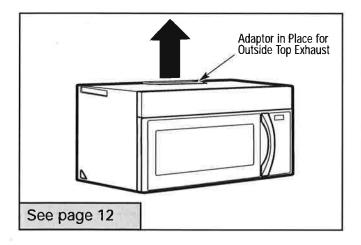
# 2 INSTALLATION TYPES (Choose A, B or C)

This microwave oven is designed for adaptation to the following three types of ventilation:

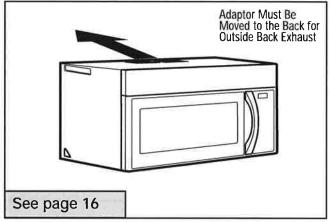
- A. Outside Top Exhaust (Vertical Duct)
- B. Outside Back Exhaust (Horizontal Duct)
- C. Recirculating (Non-Vented Ductless)

**NOTE:** This microwave is shipped assembled for Recirculating. Select the type of ventilation required for your installation and proceed to that section.

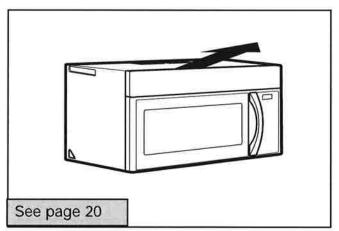
# A OUTSIDE TOP EXHAUST (VERTICAL DUCT)



# B OUTSIDE BACK EXHAUST (HORIZONTAL DUCT)



# C RECIRCULATING (NON-VENTED DUCTLESS)



Models are shipped for recirculating exhaust. Some models have a disposable charcoal filter installed to help remove smoke and odors.

NOTE: Read the next two pages only if you plan to vent your exhaust to the outside. If you plan to recirculate the air back into the room, proceed to page 20.

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## **Installation Instructions**

### INSTALLATION INSTRUCTIONS FOR EXTERNAL EXHAUST DUCTING

NOTE: If you need to install ducts, note that the total duct length of 31/4" x 10" (8.2 x 25.4 cm) rectangular or 5" (12.7 cm) diameter / 6" (15.2 cm) diameter round duct should not exceed 120 equivalent feet (36.5 m).

Outside ventilation requires an EXTERNAL EXHAUST DUCT.Read the following carefully.

NOTE: It is important that venting be installed using the most direct route and with as few elbows as possible. This ensures clear venting of exhaust and helps prevent blockages. Also, make sure dampers swing freely and nothing is blocking the ducts.

#### **Exhaust connection:**

The exhaust adaptor has been designed to mate with a standard 3¼" x 10" (8.2 x 25.4 cm) rectangular duct.

If a round duct is required, a rectangular-to-round transition adaptor must be used. A 5"(12.7cm)/6" (15.2cm) diameter duct is acceptable to use.

#### Maximum duct length:

For satisfactory air movement, the total duct length of 3¼" x 10" (8.2 x 25.4 cm) rectangular or 5" (12.7 cm) diameter/6 " (15.2 cm) diameter round duct should not exceed 120 equivalent feet (36.5 m).

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Elbows, transitions, wall and roof caps, etc., present additional resistance to airflow and are equivalent to a section of straight duct which is longer than their actual physical size. When calculating the total duct length, add the equivalent lengths of all transitions and adaptors plus the length of all straight duct sections. The chart below shows you how to calculate total equivalent ductwork length using the approximate feet of equivalent length of some typical ducts.

DUCT PIECES	DUCT PIECES		х	NUMBER USED	-	EQUIVALENT LENGTH		
	Rectangular-to-Round Transition Adaptor*	5 Ft. (1.5 m)	Х	( )	=	Ft. or m		
	Wall Cap	40 Ft. (12.2 m)	Х	( )	=	Ft. or m		
	90° Elbow	10 Ft. (3 m)	Х	( )	E	Ft. or m		
	45° Elbow	5 Ft. (1.5 m)	Х	( )		Ft. or m		
	90° Elbow	25 Ft. (7.6 m)	Х	( )	=	Ft. or m		
	45° Elbow	5 Ft. (1.5 m)	Х	( )	Ħ	Ft. or m		
	Roof Cap	24 Ft. (7.3 m)	Х	( )		Ft. or m		
	Straight Duct 6" (15.2 cm) Round or 31/4" x 10" (8.2 x 25.4 cm Rectangular)	1 Ft. (0.3 m)	Х	( )	<b>a</b>	Ft. or m		
	Total Ductwork =							



<sup>\*</sup> IMPORTANT: If a rectangular-to-round transition adaptor is used, the bottom corners of the damper will have to be cut to fit, using the tin snips, in order to allow free movement of the damper.

Equivalent lengths of duct pieces are based on actual tests and reflect requirements for good venting performance with any vent hood

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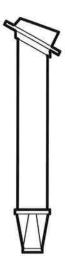
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# **Installation Instructions**

### **EXTERNAL EXHAUST DUCTING**

#### **OUTSIDE TOP EXHAUST (EXAMPLE ONLY)**

The following chart describes an example of one possible ductwork installation.



DUCT PIECES		EQUIVALENT LENGTH	х	NUMBER USED	<b>4</b>	EQUIVALENT LENGTH
	Roof Cap	24 Ft. (7.3 m)	Х	(1)	÷	24 Ft. (7.3 m)
	12 Ft. (3.6 m) Straight Duct (6"/15.2 cm Round)	12 Ft. (3.6 m)	Х	(1)	-	12 Ft. (3.6 m)
	Rectangular-to-Round Transition Adaptor*	5 Ft. (1.5 m)	х	(1)	i.e	5 Ft. (1.5 m)
Equivalent length reflect requireme	41 Ft. (12.5 m)					

<sup>\*</sup> IMPORTANT: If a rectangular-to-round transition adaptor is used, the bottom corners of the damper will have to be cut to fit, using the tin snips, in order to allow free movement of the damper.

#### **OUTSIDE BACK EXHAUST (EXAMPLE ONLY)**

The following chart describes an example of one possible ductwork installation.

n	DUCT PIECES		EQUIVALENT LENGTH*	х	NUMBER USED	SE SE	EQUIVALENT LENGTH
		Wall Cap	40 Ft. (12.2 m)	Х	(1)	ÿΈ	40 Ft. (12.2 m)
		3 Ft. Straight Duct (31/4" x 10"/8.2 x 25.4 cm Rectangular)	3 Ft. (0.9 m)	Х	(1)		3 Ft. (0.9 m)
		90° Elbow	10 Ft. (3 m)	X	(2)	, it	20 Ft. (3 m)
20		Equivalent lengths of duct pieces are based on actual tests and reflect requirements for good venting performance with any vent hood.				jth =	63 Ft. (19.2 m)

NOTE: For back exhaust, care should be taken to align exhaust with space between studs, or wall should be prepared at the time it is constructed by leaving enough space between the wall studs to accommodate exhaust.

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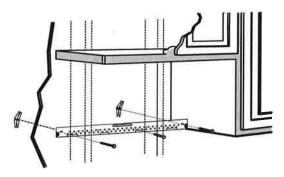
# Installation Instructions

# **OUTSIDE TOP EXHAUST (Vertical Duct)**

#### INSTALLATION OVERVIEW A1. Attach Mounting Plate to Wall A2. Prepare Top Cabinet A3. Adapting Microwave Blower for Outside Top Exhaust A4. Check Damper Operation A5. Mount Microwave Oven A6. Adjust Exhaust Adaptor A7. Connect Ductwork **IMPORTANT NOTES:** Make sure the screws for the blower motor and blower plate are securely tightened when they are reinstalled. This will help to prevent excessive vibration. Make sure the motor wiring has

## A1. ATTACH THE MOUNTING PLATE TO THE WALL

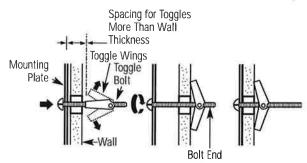
been properly routed and secured. and that the wires are not pinched.



Attach the plate to the wall using toggle bolts. At least one wood screw must be used to attach the plate to a wall stud.

- 1 Remove the toggle wings from the bolts.
- 2 Insert the bolts into the mounting plate through the holes designated to go into drywall and reattach the toggle wings to 3/4" (19 mm) onto each bolt.

#### To use toggle bolts:



IMPORTANT: Do not remove the cardboard spacers between the heat shield and door.

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3 Place the mounting plate against the wall and insert the toggle wings into the holes in the wall to mount the plate.

NOTE: Before tightening toggle bolts and wood screw, make sure the bottom of the mounting plate touch the bottom of the cabinet when pushed flush against the wall and that the plate is properly centered under the cabinet.

CAUTION: Be careful to avoid pinching fingers between the back of the mounting plate and the wall.

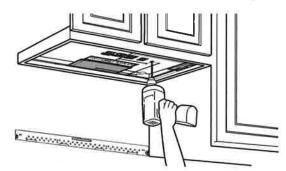
4 Tighten all bolts. Pull the plate away from the wall to help tighten the bolts.

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## Installation Instructions

### **A2.** USE TOP CABINET TEMPLATE FOR PREPARATION OF TOP **CABINET**

You need to drill holes for the top support screws, a hole large enough for the power cord to fit through, and a cutout large enough for the exhaust adaptor.

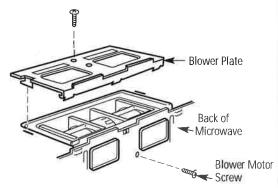


- Read the instructions on the TOP CABINET TEMPLATE.
- Tape it underneath the top cabinet.
- Drill the holes, following the instructions on the TOP CABINET TEMPLATE.

**CAUTION:** Wear safety goggles when drilling holes in the cabinet bottom.

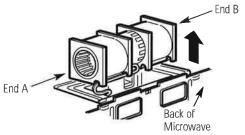
#### **A3**. ADAPTING MICROWAVE **BLOWER FOR OUTSIDE** TOP EXHAUST

1 Place the microwave in its upright position, with the top of the unit facing up.



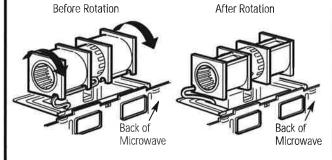
Remove the screw that holds the blower plate to the microwave. Remove and save the screw holding the blower motor to the microwave.

2 Carefully pull out the blower unit. The wires will extend far enough to allow you to adjust the blower unit.

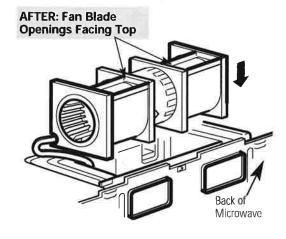


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Roll the blower unit 90° so that fan blade openings are facing out the top of the microwave.



4 Place the blower unit back into the opening.



CAUTION: Do not pull or stretch the blower unit wiring. Make sure the wires are not pinched, and that they are properly secured.

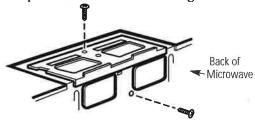
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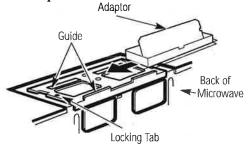
# Installation Instructions

#### A3. ADAPTING MICROWAVE **BLOWER FOR OUTSIDE** TOP EXHAUST

- 5 Secure blower unit to microwave with the screw removed in Step 1. Make sure the screw is tight.
- 6 Replace blower plate with the screw removed in Step 1. Make sure the screw is tight.

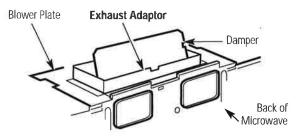


Attach the exhaust adaptor to the top of the blower plate by sliding it into the guides of the blower plate.



Push in securely until it is in the locking tabs. Take care to assure that the damper hinge is installed so that the damper swings freely.

### A4. CHECK FOR PROPER DAMPER OPERATION



- Make sure tape securing damper is removed and damper pivots easily before mounting microwave.
- You will need to make adjustments to assure proper alignment with your house exhaust duct after the microwave is installed.

#### MOUNT THE MICROWAVE **OVEN**



FOR EASIER INSTALLATION AND PERSONAL SAFETY, WE RECOMMEND THAT TWO PEOPLE INSTALL THIS MICROWAVE OVEN.

IMPORTANT: Do not grip or use the handle or heat shield during installation. Do not remove the cardboard spacers between the heat shield and door.

**NOTE:** If your cabinet is metal, use the nylon grommet around the power cord hole to prevent cutting of the cord.

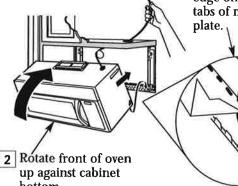
NOTE: We recommend using filler blocks if the cabinet front hangs below the cabinet bottom shelf.

IMPORTANT: If filler blocks are not used, case damage may occur from overtightening screws.

NOTE: When mounting the microwave oven, thread power cord through hole in bottom of top cabinet. Keep it tight throughout Steps 1-3. Do not pinch cord or lift oven by pulling cord.

1 Lift microwave, tilt it forward, and hook slots at back bottom edge onto four lower tabs of mounting plate.

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bottom.

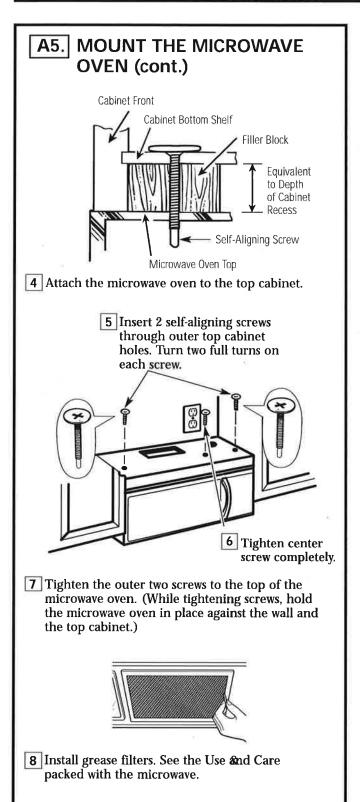
3 Insert a self-aligning screw through top center cabinet hole. Temporarily secure the oven by turning the screw at least two full turns after the threads have engaged. (It will be completely tightened later.) Be sure to keep power cord tight. Be careful not to pinch the cord, especially when mounting flush to bottom of cabinet.

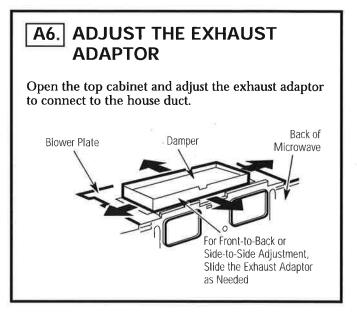
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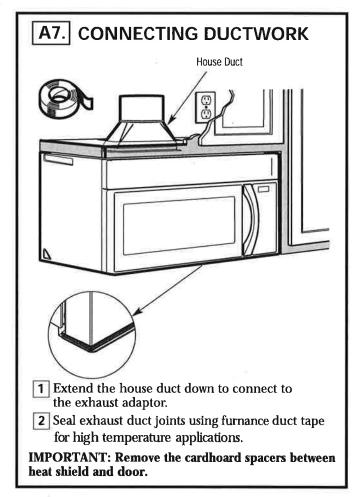
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# **Installation Instructions**





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# Installation Instructions

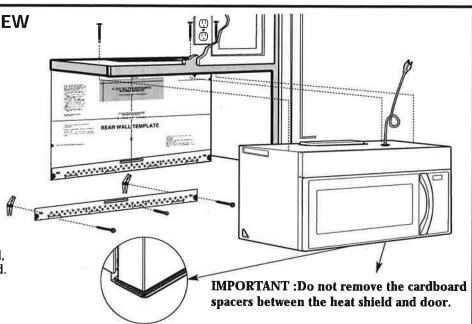
# **OUTSIDE BACK EXHAUST (Horizontal Duct)**

#### **INSTALLATION OVERVIEW**

- **B1.** Prepare Rear Wall
- **B2.** Remove Blower Plate
- **B3.** Attach Mounting Plate to Wall
- **B4.** Prepare Top Cabinet
- **B5**. Adjust Blower
- **B6.** Mount the Microwave Oven

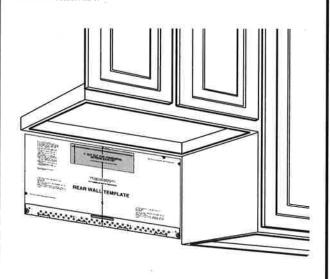
#### **IMPORTANT NOTES:**

- Make sure the screws for the blower motor and blower plate are securely tightened when they are reinstalled. This will help to prevent excessive vibration.
- Make sure the motor wiring has been properly routed and secured, and that the wires are not pinched.



#### **B1.** PREPARING THE REAR WALL FOR OUTSIDE BACK EXHAUST

You need to cut an opening in the rear wall for outside exhaust.

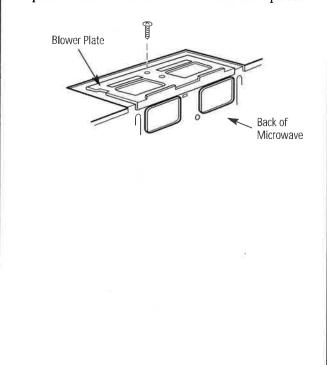


- Read the instructions on the REAR WALL TEMPLATE.
- Tape it to the rear wall.
- Cut the opening, following the instructions of the REAR WALL TEMPLATE.

#### B2. **REMOVE BLOWER PLATE**

Remove and save the screw that holds the blower plate to the microwave. Lift off the blower plate.

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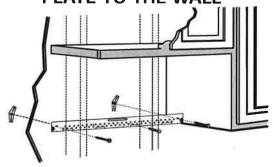
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## **Installation Instructions**

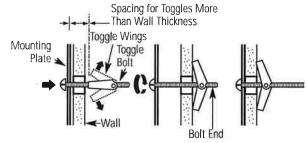
### **B3.** ATTACH THE MOUNTING PLATE TO THE WALL



Attach the plate to the wall using toggle bolts. At least one wood screw must be used to attach the plate to a wall stud.

- 1 Remove the toggle wings from the bolts.
- 2 Insert the bolts into the mounting plate through the holes designated to go into drywall and reattach the toggle wings to 3/4" (19 mm) onto each bolt.

#### To use toggle bolts:



3 Place the mounting plate against the wall and insert the toggle wings into the holes in the wall to mount the plate.

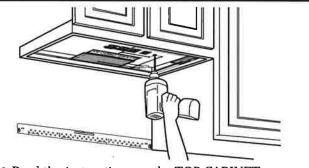
NOTE: Before tightening toggle bolts and wood screw, make sure the bottom of the mounting plate touch the bottom of the cabinet when pushed flush against the wall and that the plate is properly centered under the cabinet.

**CAUTION:** Be careful to avoid pinching fingers between the back of the mounting plate and the wall.

Tighten all bolts. Pull the plate away from the wall to help tighten the bolts.

#### **USE TOP CABINET TEMPLATE** B4. FOR PREPARATION OF TOP **CABINET**

You need to drill holes for the top support screws and a hole large enough for the power cord to fit through.



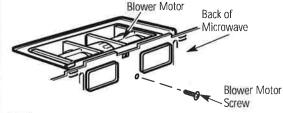
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- Read the instructions on the TOP CABINET TEMPLATE.
- Tape it underneath the top cabinet.
- Drill the holes, following the instructions on the TOP CABINET TEMPLĂTE.

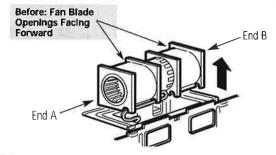
CAUTION: Wear safety goggles when drilling holes in the cabinet bottom.

#### **ADAPTING MICROWAVE B5**. **BLOWER FOR OUTSIDE BACK EXHAUST**

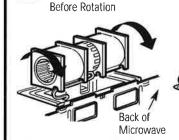
1 Remove and save screw that holds blower motor to microwave.

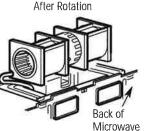


2 Carefully pull out the blower unit. The wires will extend far enough to allow you to adjust the blower unit.



3 Roll the blower unit 90°

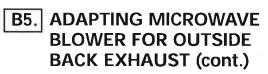




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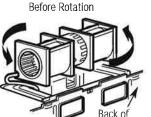
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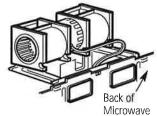
# **Installation Instructions**



4 Rotate blower unit counterclockwise 180°.

Microwave



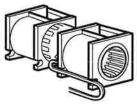


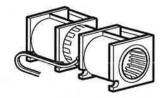
After Rotation

**5** Gently remove the wires from the grooves. Reroute the wires through grooves on other side of the blower unit.

Before Rerouting

After Rerouting

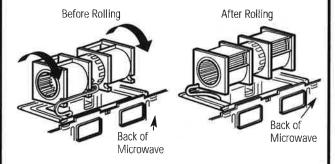




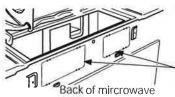
Wires Routed Through Right Side

Wires Routed Through Left Side

Roll the blower unit 90° so that fan blade openings are facing out the back of the microwave.

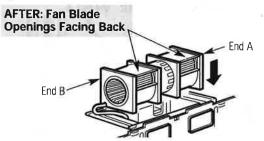


7 Remove the knockout plates in the back of the unit with snips. (For some models) Knockout Plates:



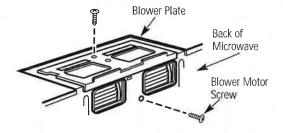
Snip all 4 webs on each knockout panel and remove the metal knockouts for rear airflow. Please take care to remove any sharp edges created from removing the knockout plates.

8 Place the blower unit back into the opening.

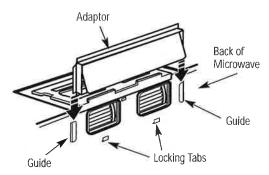


CAUTION: Do not pull or stretch the blower unit wiring. Make sure the wires are not pinched, and that they are properly secured. **NOTE: The blower unit exhaust** openings should match exhaust openings on rear of microwave oven.

Secure the blower unit to the microwave with the original screw.



- 10 Replace the blower plate in the same position as before with the screw. Make sure the screw is tight.
- 11 Attach the exhaust adaptor to the rear of the oven by sliding it into the guides at the top center of the back of the oven.



Push in securely until it is in the lower locking tabs. Take care to assure that the damper hinge is installed so that it is at the top and that the damper swings freely.

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# **Installation Instructions**

### **B6.** MOUNT THE MICROWAVE **OVEN**



FOR EASIER INSTALLATION AND PERSONAL SAFETY, WE RECOMMEND THAT TWO PEOPLE INSTALL THIS MICROWAVE OVEN.

IMPORTANT: Do not grip or use the handle or heat shield during installation. Do not remove the cardboard spacers between the heat shield and door.

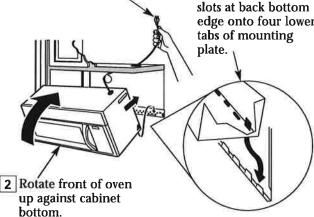
NOTE: If your cabinet is metal, use the nylon grommet around the power cord hole to prevent cutting of the cord.

NOTE: We recommend using filler blocks if the cabinet front hangs below the cabinet bottom shelf.

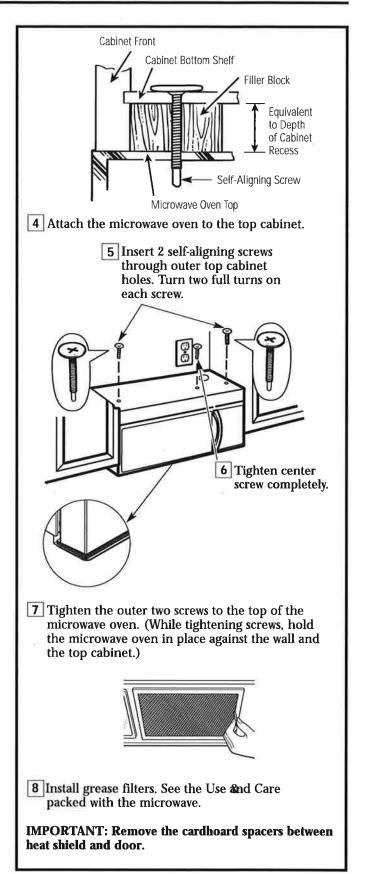
IMPORTANT: If filler blocks are not used, case damage may occur from overtightening screws.

NOTE: When mounting the microwave oven, thread power cord through hole in bottom of top cabinet. Keep it tight throughout Steps 1-3. Do not pinch cord or lift oven by pulling cord.

1 Lift microwave, tilt it forward, and hook slots at back bottom edge onto four lower tabs of mounting plate.



3 Insert a self-aligning screw through top center cabinet hole. Temporarily secure the oven by turning the screw at least two full turns after the threads have engaged. (It will be completely tightened later.) Be sure to keep power cord tight. Be careful not to pinch the cord, especially when mounting flush to bottom of cabinet.



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TILEX NO. 000509/201/ Filed 12/30/17 Rega 4700 1452 F: 11/20/2017 NYSCEF DOC. NCase 5:17-cv-01397-TJM-DEP Document 1-1

# **Installation Instructions**

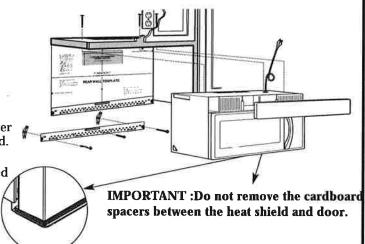
# **RECIRCULATING** (Non-Vented Ductless)

#### INSTALLATION OVERVIEW

- C1. Attach Mounting Plate to Wall
- C2. Prepare Top Cabinet
- C3. Check Blower Plate
- C4. Mount the Microwave Oven
- C5. Install or change Charcoal Filter

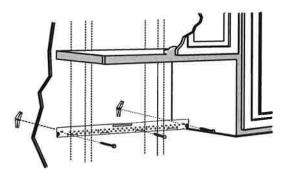
#### **IMPORTANT NOTES:**

- Make sure the screws for the blower motor and blower plate are securely tightened when they are reinstalled. This will help to prevent excessive vibration.
- Make sure the motor wiring has been properly routed and secured, and that the wires are not pinched.



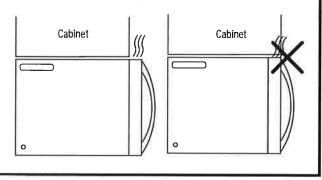
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### C1. ATTACH THE MOUNTING PLATE TO THE WALL



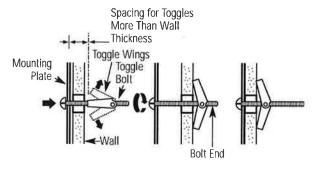
Attach the plate to the wall using toggle bolts. At least one wood screw must be used to attach the plate to a wall stud.

NOTE: If the cabinet depth including the cabinet doors is more than 13" then the unit must be spaced out from wall using adequate materials supporting 150 Ibs to allow proper top vent air exhaust/intake.



- 1 Remove the toggle wings from the bolts.
- 2 Insert the bolts into the mounting plate through the holes designated to go into drywall and reattach the toggle wings to 34" (19 mm) onto each bolt.

#### To use toggle bolts:



3 Place the mounting plate against the wall and insert the toggle wings into the holes in the wall to mount the plate.

**NOTE:** Before tightening toggle bolts and wood screw, make sure the bottom of the mounting plate touch the bottom of the cabinet when pushed flush against the wall and that the plate is properly centered under the cabinet.

CAUTION: Be careful to avoid pinching fingers between the back of the mounting plate and the wall.

4 Tighten all bolts. Pull the plate away from the wall to help tighten the bolts.

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# **Installation Instructions**

### **USE TOP CABINET TEMPLATE** FOR PREPARATION OF TOP CABINET

You need to drill holes for the top support screws and a hole large enough for the power cord to fit through.



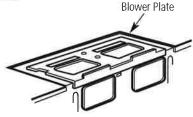
- Read the instructions on the TOP CABINET TEMPLATE.
- Tape it underneath the top cabinet.

**NOTE:** Adjust top template accordingly if the microwave is being spaced out from the wall due to cabinet depth (including cabinet doors) of more than 13".

Drill the holes, following the instructions on the TOP CABINET TEMPLATE.

**CAUTION:** Wear safety goggles when drilling holes in the cabinet bottom.

#### CHECK BLOWER PLATE



- Place the microwave in its upright position, with the top of the unit facing up.
- Check to see that the blower plate is correctly installed on the unit.

## MOUNT THE MICROWAVE OVEN



FOR EASIER INSTALLATION AND PERSONAL SAFETY, WE RECOMMEND THAT TWO PEOPLE INSTALL THIS MICROWAVE OVEN.

IMPORTANT: Do not grip or use the handle or heat shield during installation. Do not remove the cardboard spacers between the heat shield and door.

NOTE: If your cabinets metal, use the nylon remove the property of the pro

grommet around the power cord hole to prevent cutting of the cord.

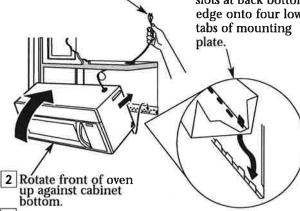
NOTE: We recommend using filler blocks if the cabinet front hangs below the cabinet bottom shelf.

IMPORTANT: If filler blocks are not used, case damage may occur from overtightening screws.

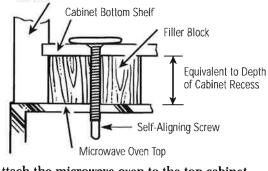
NOTE: When mounting the microwave oven, thread power cord through hole in bottom of top cabinet. Keep it tight throughout Steps 1-3. Do not pinch cord or lift oven by pulling cord.

1 Lift microwave, tilt it forward, and hook slots at back bottom edge onto four lower tabs of mounting plate.

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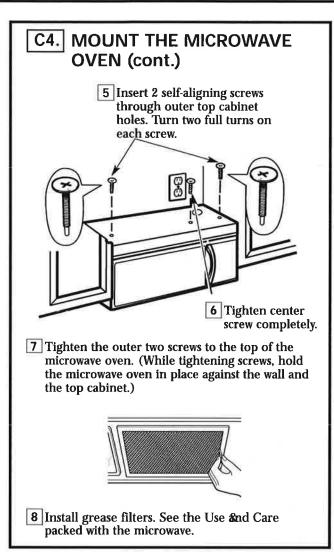
3 Insert a self-aligning screw through top center cabinet hole. Temporarily secure the oven by turning the screw at least two full turns after the threads have engaged. (It will be completely tightened later.) Be sure to keep power cord tight. Be careful not to pinch the cord, especially when mounting flush to bottom of cabinet.



4 Attach the microwave oven to the top cabinet.

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# **Installation Instructions**

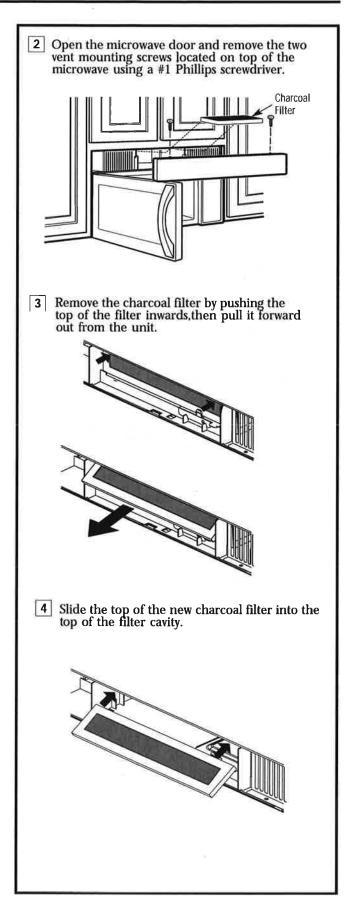




NOTE: The charcoal filter is factory installed in some models. Refer to the Use and Care to see if yours is factory installed and for replacement information.

For models without the recirculation filter access door, follow these steps to replace or install a charcoal filter.

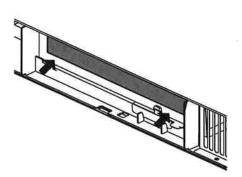
1 Unplug microwave oven or disconnect power.



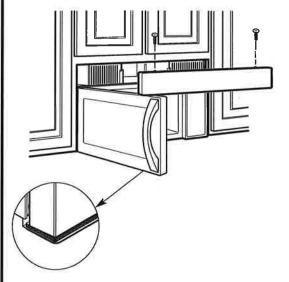
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# **Installation Instructions**

Press the bottom of charcoal filter to place it into the correct position.



6 Reinstall the vent by sliding the bottom of the went into place. Push the vent top into position and slide right into place. Replace the two vent mounting screws located on top of the microwave using a #1 Phillips screwdriver.



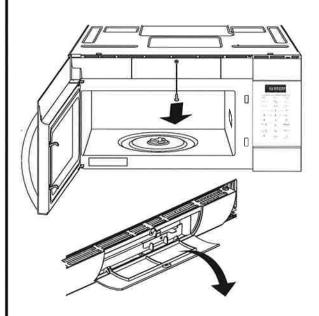
7 Close the microwave door. Plug in microwave oven or reconnect power.

IMPORTANT: Remove the cardhoard spacers between heat shield and door.

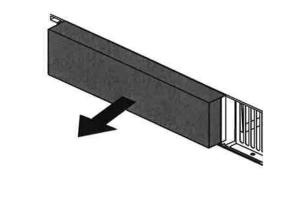
For models with the recirculation filter access door, follow these steps to replace or install a PureAir® Microwave Filter.

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- 1 Remove the PureAir® Filter from the packaging and shake filter to remove excess carbon.
- 2 Use a Phillips head screwdriver to unscrew the PureAir® Filter access door.
- 3 Open the filter access door.



4 Remove the existing PureAir® Filter(if installed) by pulling forward out from the unit.

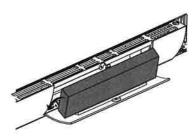


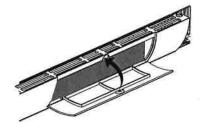
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# **Installation Instructions**

5 Place the new PureAir® Filter into the slot behind the door at an angle until it's upright and securely placed in the duct.





6 Make sure the PureAir® Filter is nested vertically in the slot. Close access door, tighten screw and the PureAir® Filter is ready to use.

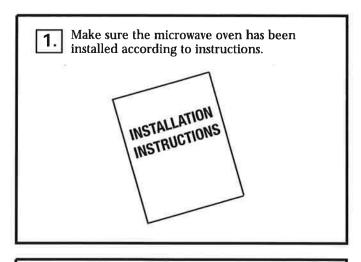
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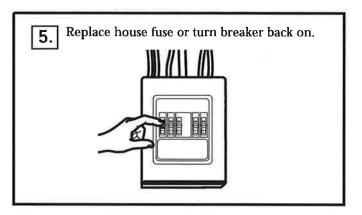
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# **Installation Instructions**

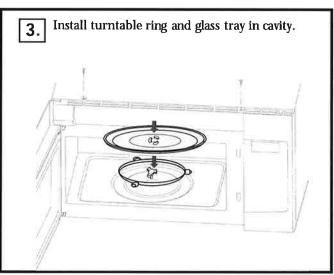
## **BEFORE YOU USE YOUR MICROWAVE**

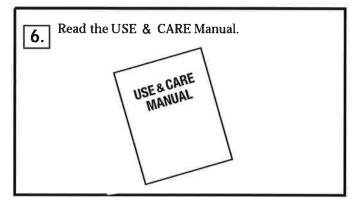


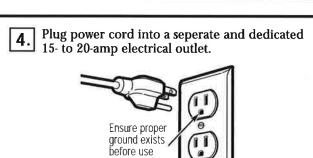


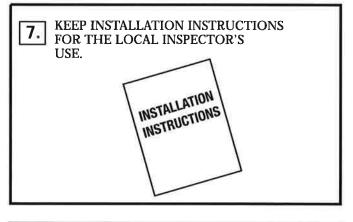
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Remove all packing material from the microwave oven.







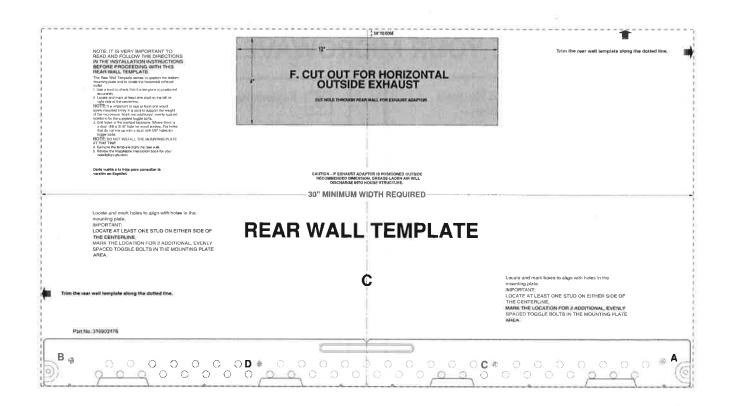


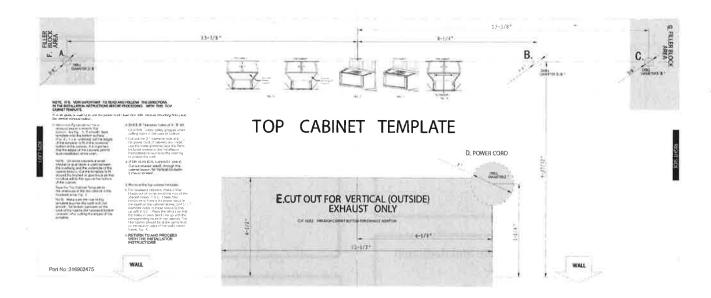


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# Instructions d'installation

# Four à micro-ondes à hotte intégrée

Des questions? Appelez au 1-800-944-9044(US) ou 1-800-265-8352(Canada)

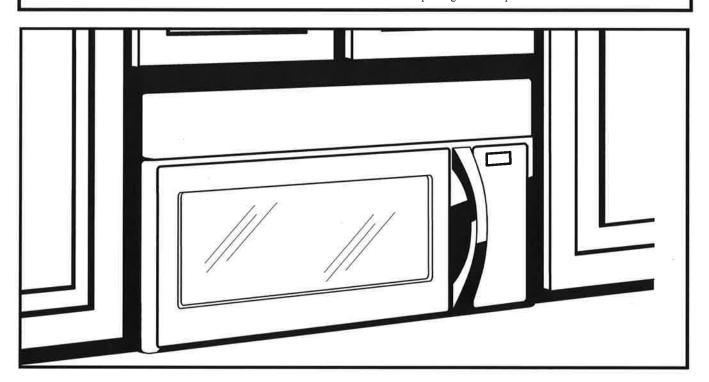
#### AVANT DE COMMENCER

Lisez attentivement toutes ces instructions.

- IMPORTANT Conservez ces instructions pour l'inspecteur local.
- IMPORTANT Respectez tous les codes et règlements en vigueur.
- Remarque destinée à l'installateur Assurezvous de laisser ces instructions au consommateur.
- Remarque destinée au consommateur Conservez ces instructions pour vous y reporter
- Niveau de compétence L'installation de cet appareil nécessite des compétences de base en mécanique et en électricité.

ultérieurement.

- L'installateur est responsable de la qualité de l'installation.
- Une panne causée par une mauvaise installation n'est pas couverte par la garantie du produit.



VEUILLEZ LIRE ATTENTIVEMENT. CONSERVEZ CES INSTRUCTIONS.

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# Instructions d'installation

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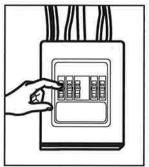
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#### Instructions d'installation

# MESURES DE SÉCURITÉ IMPORTANTES

Ce produit nécessite une prise de courant à trois alvéoles mise à la terre. Avant d'entreprendre l'installation, l'installateur doit vérifier la continuité de la mise à la terre de la boîte de la prise de courant pour s'assurer que cette dernière est correctement mise à la terre. Si ce n'est pas le cas, ou si la boîte ne répond pas aux exigences électriques indiquées (à la section EXIGENCES ÉLECTRIQUES), il faut faire appel à un électricien qualifié pour corriger tout

défaut,



ATTENTION: Pour votre sécurité, enlevez le fusible ou déclenchez le disjoncteur au panneau de distribution principal avant d'entreprendre l'installation, afin d'éviter toute blessure grave ou mortelle imputable à un choc électrique.

ATTENTION: Pour votre sécurité, la surface de montage doit être en mesure de supporter la charge des armoires, ainsi qu'un poids supplémentaire de 28,5 à 38,5 kg (63 à 85 lb) correspondant au poids du produit, et la charge du four qui peut atteindre 22,7 kg (50 lb), pour un poids total de 51,3 à 61,2 kg (113 à 135 lb).

ATTENTION: Pour votre sécurité, ce produit ne doit pas être installé avec des armoires aménagées en îlot ou en péninsule. Il doit être fixé À LA FOIS à une armoire supérieure ET à un mur.

REMARQUE: Pour faciliter l'installation et pour votre sécurité, l'installation de ce produit doit être effectuée par deux personnes.

IMPORTANT - VEUILLEZ LIRE ATTENTIVEMENT. POUR VOTRE SÉCURITÉ, CET APPAREIL DOIT ÊTRE CORRECTEMENT MIS À LA TERRE POUR ÉVITER UN CHOC GRAVE OU MORTEL.



Pour diminuer les risques de choc électrique, le cordon d'alimentation de cet appareil est muni d'une fiche à trois broches (mise à la terre) qui correspond à une prise murale à trois alvéoles, mise à la terre.

Demandez à un électricien qualifié de vérifier la prise murale et le circuit électrique pour vous assurer que la prise est correctement mise à la terre.

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Si la prise murale est du type standard à deux alvéoles, il est très important de la faire remplacer par une prise à trois alvéoles correctement mise à la terre en vous adressant à un électricien qualifié.

NE COUPEZ. NE DÉFORMEZ ET NE RETIREZ EN AUCUN CAS UNE DES BROCHES DE LA FICHE DU CORDON D'ALIMENTATION. N'UTILISEZ PAS DE RALLONGE.

## **EXIGENCES** ÉLECTRIQUES

Les caractéristiques nominales de ce produit sont : 120 V CA, 60 Hz, 15 A et 1,6 kW. Ce produit doit être branché à un circuit d'alimentation séparée et dédiée de tension et de fréquence appropriées. La grosseur des fils doit être conforme aux exigences du Code national d'électricité ou du code local en vigueur pour cette puissance nominale. La fiche du cordon d'alimentation doit être branchée dans une prise de courant mise à la terre, séparée et dédiée de 15 ou 20 ampères. La boîte de la prise doit être aménagée dans l'armoire située au-dessus du four à micro-ondes. La boîte de la prise et le circuit d'alimentation doivent être installés par un électricien qualifié, conformément aux normes du Code national d'électricité ou du code local en vigueur.

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# Instructions d'installation

# **DOMMAGES** — EXPÉDITION/ INSTALLATION

- · Si l'appareil est endommagé durant le transport, retournez-le au magasin où vous l'avez acheté pour réparation ou remplacement.
- Si l'appareil est endommagé par le client, la réparation ou le remplacement reste à la charge du client.
- Si l'appareil est endommagé par l'installateur (s'il s'agit d'une personne différente du client), la réparation ou le remplacement doivent faire l'objet d'une entente entre le client et l'installateur.

# PIÈCES COMPRISES

#### SACHET DE QUINCAILLERIE

PIÈCE	TÈCE						
	Vis à bois (1/4 x 2 po)	2					
0-{}-	Boulons à ailettes (et écrous à oreilles) (3/16 x 3 po)	2					
1	Vis à métaux à auto-alignement (1/4 po - 28 x 3-1/4 po)	3					
Chromatan and Chromatan	Passe-fil en nylon (pour armoires en métal)	1					

Vous trouverez les pièces de quincaillerie dans un sachet fourni avec l'appareil. Vérifiez que vous avez reçu toutes ces pièces.

REMARQUE: Des pièces supplémentaires sont incluses.

# PIÈCES COMPRISES (SUITE)

#### SACHET DE OUINCAILLERIE

PIÈCE		QUANTITÉ	
	Gabarit pour armoire supérieure	1	
	Gabarit po ur mur arriére combiné	1	
INSTRUCTIONS D'INSTALLATION d'entretien	Instructions d'installation	1	
	Mode d'emploi et d'entretien	1	
	Filtres à graisses emballés séparément	2	
	Adaptateur de conduit d'évacuation	1	
	Plateau en verre	1	
	Anneau de plateau tournant	1	
Pour certains modèles	Trépied métallique de convection	1	
Pour certains modèles	Etagère	1	
Pour certains modèles	Filtre à micro-ondes PurcAir <sup>MD</sup>	1	

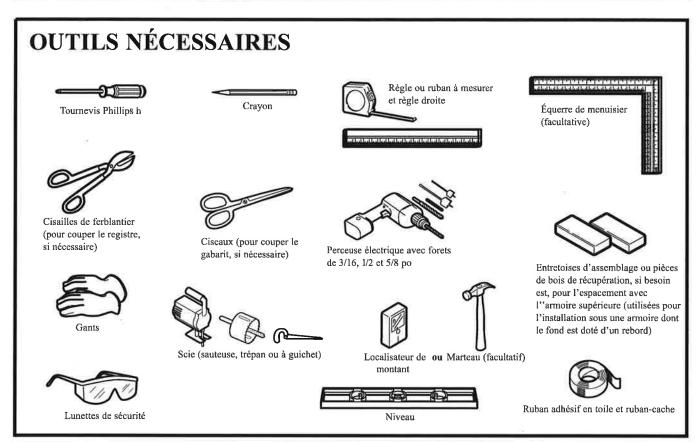
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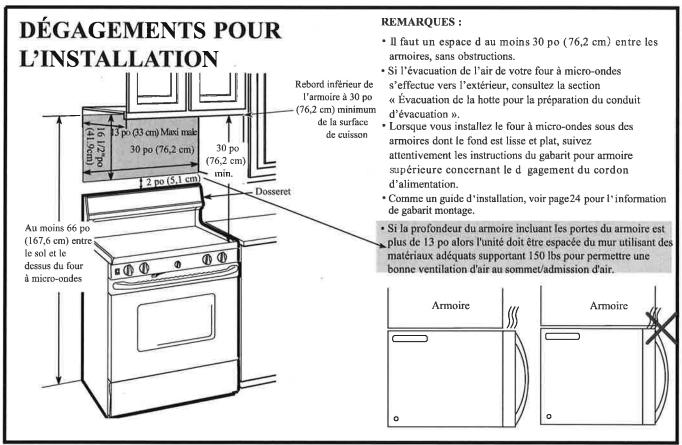
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### Instructions d'installation





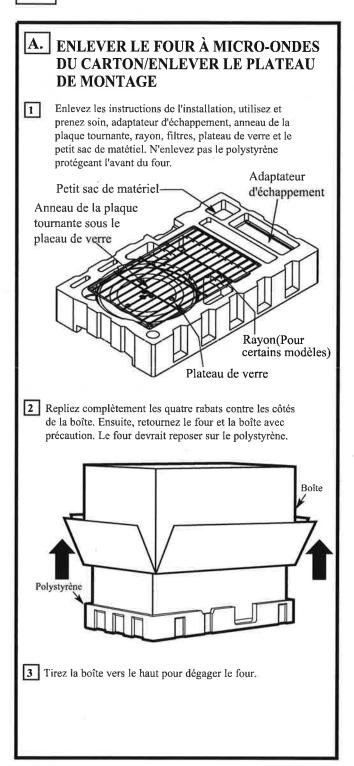
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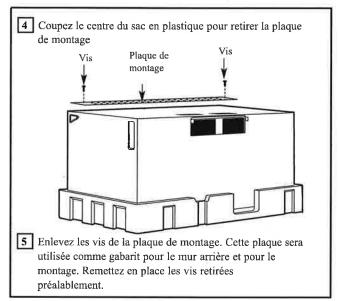
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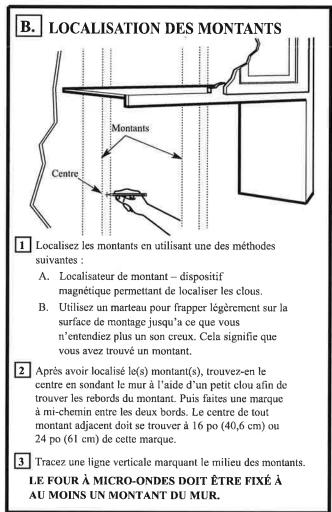
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### Instructions d'installation

# INSTALLATION DE LA PLAQUE DE MONTAGE







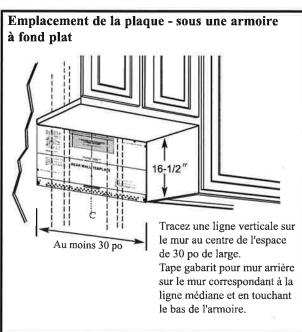
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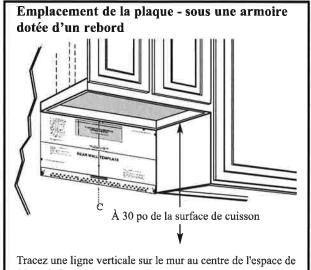
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#### Instructions d'installation

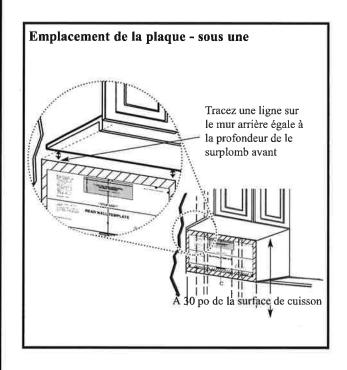
#### C. | ÉTABLISSEMENT DE L'EMPLACEMENT DE LA PLAQUE MURALE SOUS VOTRE ARMOIRE





30 po de large.

Tape gabarit pour mur arrière sur le mur correspondant à la ligne médiane et en touchant le cadre bas de l'armoire.



Vos armoires peuvent être dotées de garnitures décoratives qui entravent l'installation du micro-ondes. Enlevez l'élément décoratif pour installer convenablement le four à micro-ondes et pour vous assurer qu'il est de

#### LE FOUR À MICRO-ONDES DOIT ÊTRE DE NIVEAU.

Utilisez un niveau pour vous assurer que le fond de l'armoire est de niveau.

Si les armoires sont dotées uniquement d'un rebord avant, sans rebord sur les côtés ou à l'arrière, installez la plaque de montage plus bas, à la même distance que le rebord avant de l'armoire. Ainsi, le four sera de niveau.

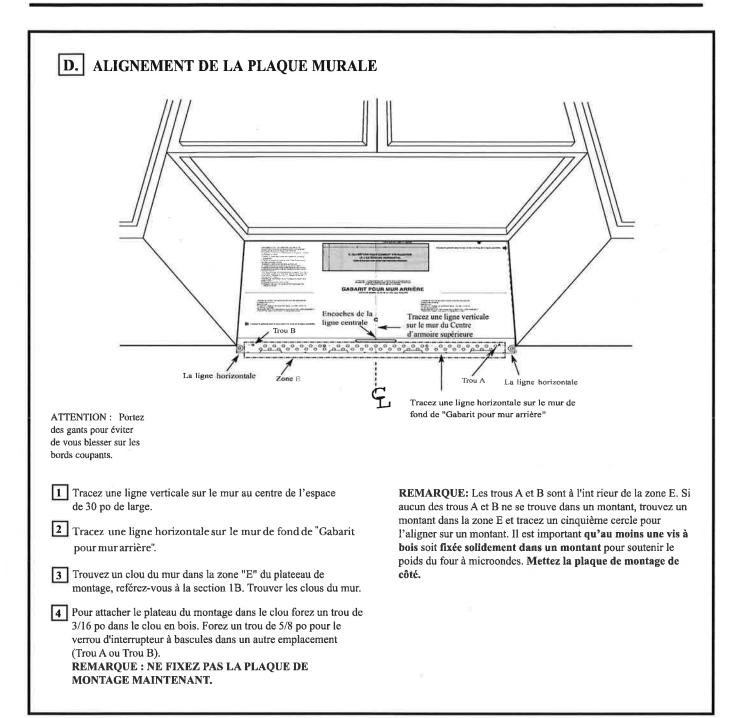
- 1 Mesurez la hauteur intérieure du rebord avant de l'armoire.
- 2 Tracez une ligne horizontale sous le fond de l'armoire, sur le mur arrière à une distance équivalente à la longueur intérieure du rebord avant de l'armoire.
- 3 Pour l'installation sous une armoire dotée d'un rebord avant uniquement, alignez les languettes de montage sur cette ligne horizontale, sans qu'elles touchent le fond de l'armoire, tel que décrit à l'étape D.

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#### Instructions d'installation



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# Instructions d'installation

TYPES D'INSTALLATION (Choisissez A, B ou C)

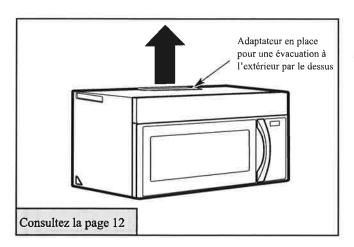
Ce four à micro-ondes est conçu pour s'adapter aux trois types d'évacuation suivants :

- A. Évacuation à l'extérieur par le dessus (conduit vertical)
- B. Évacuation à l'extérieur par l'arrière (conduit horizontal)
- C. Recyclage (sans conduit)

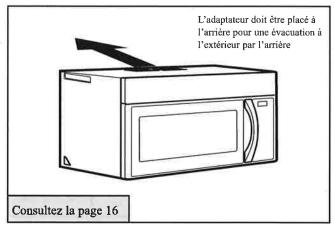
REMARQUE: Ce four à micro-ondes est équipé à l'usine en vue d'une Recyclage.

Choisissez le type d'évacuation approprié à votre installation et rendez-vous à cette section.

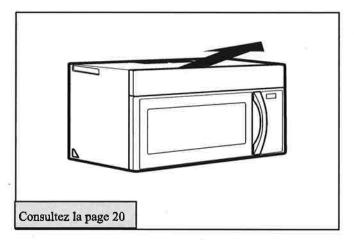
### ÉVACUATION À L'EXTÉRIEUR PAR LE DESSUS (CONDUIT VERTICAL)



#### ÉVACUATION À L'EXTÉRIEUR PAR L'ARRIÈRE (CONDUIT HORIZONTAL)



#### RECYCLAGE D'AIR (ÉVACUATION SANS CONDUIT)



Sur les modèles conçus pour le recyclage d'air, un filtre à charbon jetable est installé en usine pour retenir la fumée et les odeurs.

REMARQUE: Ne lisez les deux pages suivantes que si vous décidez d'évacuer l'air du ventilateur à l'extérieur. Si vous décidez de recycler l'air dans la pièce, rendez-vous à la page 20.

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#### Instructions d'installation

### INSTRUCTIONS POUR L'INSTALLATION EXTERIEURE DE CODUITS D'ECHAPPEMENT.

REMARQUE: Si vous devez installer des conduits, notez que la longueur totale du conduit rectangulaire de 3-1/4 po x 10 po (8,2 x 25,4 cm) ou du conduit rond de 5 po (12,7cm)/6 po (15,2 cm) de diamètre ne doit pas être supérieure à 120 pi (36,5m) de longueur équivalente.

L'évacuation vers l'extérieur requiert un CONDUIT D'ÉVACUATION POUR HOTTE. Lisez attentivement ce qui

REMARQUE: Il est important que l'évacuation soit installée en utilisant le chemin le plus direct et avec le moins de coudes possible. Cela assure une bonne évacuation et aide a prévenir les blocages. Assurez-vous également que les registres bougent librement et que rien ne bloque les conduits.

Connexion d'échappement:

L'adaptateur d'échappement a été conçu pour s'accoupler avec une canalisation rectangulaire standard de 3 1/4 x 10 po (8.2 x 25,4 cm). Si une canalisation ronde est recquise, un adaptateur de transition rectangulaire-rond doit être utilisé. Une canalisation de diamètre 5 po (12,7cm) / 6 po (15,2cm) est acceptable à utiliser.

Longueur maximale du conduit:

Pour une circulation d'air satisfaisante, la longueur totale du conduit rectangulaire de 3-1/4 x 10 po (8,2 x 25,4 cm) ou du conduit rond de 5 po (12,7cm) / 6 po (15,2 cm) de diamètre ne doit pas excéder une longueur équivalente à 120 pi (36,5m)

Les coudes, adaptateurs de transition, évents muraux ou de toiture, etc. offrent une résistance supplémentaire à la circulation de l'air et sont équivalents à une section de conduit droit plus longue que leur dimension réelle. Lorsque vous calculez la longueur totale du conduit, ajoutez les longueurs équivalentes de tous les adaptateurs de transition et des coudes, ainsi que la longueur de toutes les sections de conduit droit. Vous trouverez dans le tableau ci-dessous la longueur équivalente approximative en pieds et en mètres de certains types de conduits.

PIÈCES DE CONDUIT		LONGUEUR ÉQUIVALENTE	х	NOMBRE UTILISÉ		LONGUEUR ÉQUIVALENTE		
	Adaptateur de transition*	5 pi (1,5 m)	x	( )	<b>=</b> :	pi ou m		
	Évent mural	40 pi (12,2 m)	x	( )	=	pi ou m		
	Coude de 90°	10 pi (3 m)	x	( )	=	pi ou m		
	Coude de 45°	5 pi (1,5 m)	x	( )	=	pi ou m		
	Coude de 90°	25 pi (7,6 m)	x	( )	=:	pi ou m		
	Coude de 45°	5 pi (1,5 m)	x	( )	=0	pi ou m		
	Évent de toiture	24 pi (7,3 m)	x	( )	#.:	pi ou m		
	Conduit droit rond de 6 po (15,2 cm) ou rectangulaire de 3-1/4 x 10 po (8,2 x 25,4 cm)	1 pi (0,3 m)	х	( )	=	pi ou m		
Longueur totale = pi ou m								



\* IMPORTANT: Si vous utilisez un adaptateur de transition, il faudra couper les coins inférieurs du registre aux dimensions de l'adaptateur à l'aide de cisailles pour que le registre puisse bouger.

Les longueurs équivalentes des pièces de conduits sont basées sur des essais réels et représentent les longueurs nécessaires à une bonne ventilation pour n'importe quelle hotte.

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### Instructions d'installation

#### CANALISATION D'ECHAPPEMENT EXTERNE

# ÉVACUATION À L'EXTÉRIEUR PAR LE DESSUS (EXEMPLE SEULEMENT)

Le tableau suivant décrit un exemple d'installation de conduit.



PIÈCES DE CONDUIT		LONGUEUR ÉQUIVALENTE	х	NOMBRE UTILISÉ	=	LONGUEUR ÉQUIVALENTE
	Évent de toiture	24 pi (7,3 m)	х	(1)	п	24 pi (7,3 m)
	Conduit droit de 12 pi (3,6 m) (rond de 6 po/15,2 cm)	12 pi (3,6 m)	х	(1)	W.	12 pi (3,6 m)
	Adaptateur de transition*	5 pi (1,5 m)	х	(1)	=	5 pi (1,5 m)
Les longueurs des essais réels ventilation pou	41 pi (12,5 m)					

<sup>\*</sup> IMPORTANT: Si vous utilisez un adaptateur de transition, il faudra couper les coins inférieurs du registre aux dimensions de l'adaptateur à l'aide de cisailles pour que le registre puisse bouger.

### ÉVACUATION À L'EXTÉRIEUR PAR L'ARRIÈRE (EXEMPLE SEULEMENT)

Le tableau suivant décrit un exemple d'installation de conduit.

n	PIÈCES DE CO	NDUIT	LONGUEUR ÉQUIVALENTE	x	NOMBRE UTILISÉ	#	LONGUEUR ÉQUIVALENTE
		Évent mural	40 pi (12,2 m)	x	(1)		40 pi (12,2 m)
		Conduit droit de 3 pi (0,91 m) (rectangulaire 1/4 x 10 po/ 8,2 x 25,4 cm)	3 pi (0,9 m)	X	(1)	=	3 pi (0,9 m)
		Coude de 90°	10 pi (3 m)	x	(2)	18	20 pi (6 m)
	réels et représente	Les longueurs équivalentes des pièces de conduits sont basées sur des essais réels et représentent les longueurs nécessaires à une bonne ventilation pour n'importe quelle hotte.  Longueur totale =					

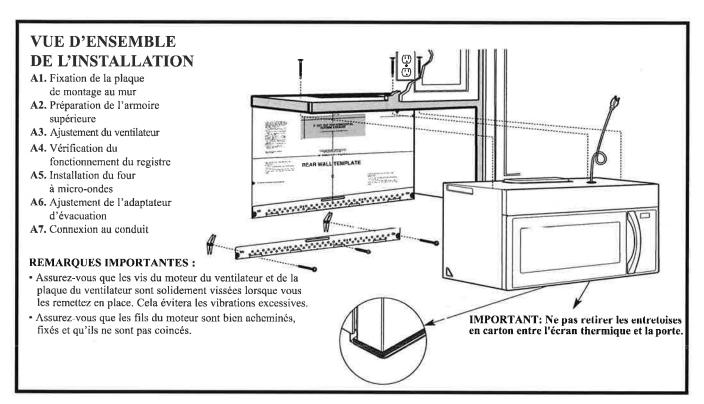
REMARQUE : Dans le cas d'une évacuation par l'arrière, veillez à aligner le conduit d'évacuation sur les espaces entre les montants, ou à préparer le mur au moment de la construction en laissant assez d'espace entre les montants pour recevoir le conduit,

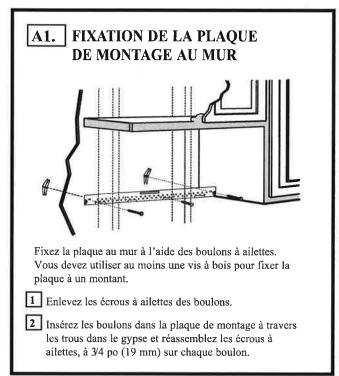
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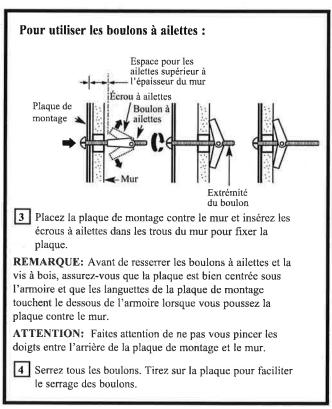
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### Instructions d'installation

# ÉVACUATION À L'EXTÉRIEUR PAR LE DESSUS (Conduit vertical)







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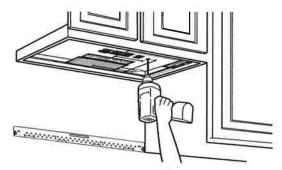
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REGEL 660 01/15/2 : 11/20/2017

#### Instructions d'installation

#### A2. | UTILISATION DU GABARIT POUR ARMOIRE SUPÉRIEURE POUR LA PRÉPARATION DE L'ARMOIRE SUPÉRIEURE

Vous devez percer des trous pour les vis de soutien supérieures, ainsi qu'un trou suffisamment grand pour y faire passer le cordon d'alimentation et une ouverture assez grande pour l'adaptateur d'évacuation.

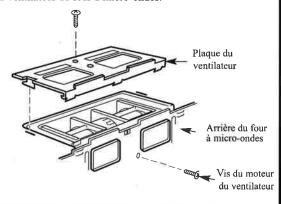


- Lisez les instructions sur le GABARIT POUR ARMOIRE
- · Collez-le sous l'armoire supérieure à l'aide de ruban
- · Percez les trous, en suivant les directives du GABARIT POUR ARMOIRE SUPÉRIEURE.

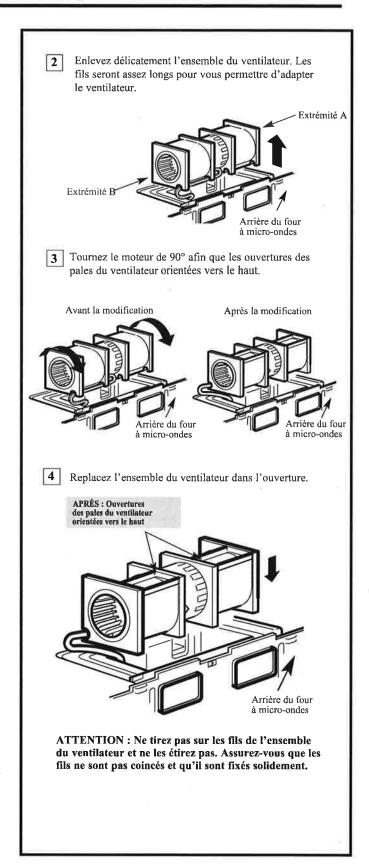
ATTENTION: Portez des lunettes de sécurité lorsque vous percez des trous dans le fond de l'armoire.

#### ADAPTATION DU VENTILATEUR A3. DU FOUR À MICRO-ONDES POUR L'ÉVACUATION À L'EXTÉRIEUR PAR LE DESSUS

1 Enlevez et conservez la vis qui retient le moteur du ventilateur au four à micro-ondes.



Enlevez la vis qui retient la plaque du ventilateur sur le four à micro-ondes. Enlevez et conservez la vis qui retient le moteur du ventilateur sur le four à micro-ondes.



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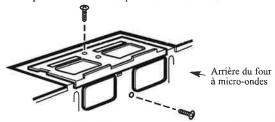
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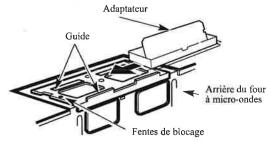
#### Instructions d'installation

#### A3. ADAPTATION DU VENTILATEUR **DU FOUR À MICRO-ONDES** POUR L'ÉVACUATION À L'EXTÉRIEUR PAR LE DESSUS

- 5 Fixez l'ensemble de ventilateur au four à micro-ondes en utilisant la vis de l'étape 1. Assurez-vous que la vis
- Replacez la plaque du ventilateur en utilisant la vis de l'étape 1. Assurez-vous que la vis est bien serrée.

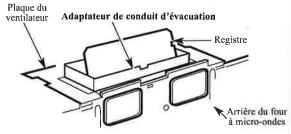


Fixez l'adaptateur d'évacuation en haut du plaque du ventilateur en le coulissant dans les guides situés, à la partie supérieure arrière du plaque du ventilateur.



Insérez-le jusqu'à ce qu'il soit dans les fentes de blocage inférieures. Assurez-vous que la charnière du registre est installée et que le registre bouge librement.

#### A4. VÉRIFICATION DU **FONCTIONNEMENT DU REGISTRE**



- · Assurez-vous que le ruban adhésif qui retient le registre a été enlevé et que le registre bouge librement avant d'installer le four.
- · Vous devrez effectuer les ajustements nécessaires pour vous assurer que le conduit du four est bien aligné sur le conduit d'évacuation du domicile après l'installation du four.

#### A5. INSTALLATION DU FOUR À MICRO-ONDES



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POUR VOTRE SÉCURITÉ ET POUR FACILITER L'INSTALLATION, L'INSTALLATION DE CE FOUR DOIT **ÊTRE EFFECTUÉE PAR DEUX PERSONNES** 

IMPORTANT: Ne pas saisir ou utiliser la poignée ou l'écran thermique durant l'installation. Ne pas retirer les entretoises en carton entre l'écran thermique et la porte.

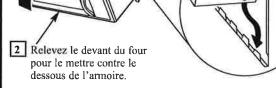
REMARQUE: Si vos armoires sont en métal, installez un passefil en nylon autour de l'orifice du cordon d'alimentation pour empêcher que le cordon soit coupé.

REMARQUE: Si le four est installé sous une armoire dotée d'un rebord avant, nous vous recommandons d'utiliser des

IMPORTANT: Si vous n'utilisez pas d'entretoises, des dommages peuvent être causés au boîtier au moment du resserrage des vis



1 Soulevez le four, penchez-le vers l'avant, et accrochez les fentes situées sur le bord inférieur à l'arrière du four sur les quatre languettes inférieures de la plaque de montage.



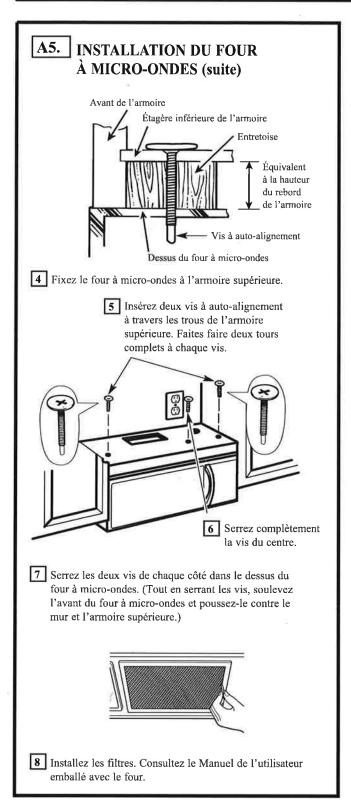
3 Insérez une vis à auto-alignement dans le trou situé au centre de l'armoire supérieure. Fixez temporairement le four en faisant faire au moins deux tours complets à la vis après que les filets aient été engagés. (Elle sera complètement resserrée plus tard.) Assurez-vous que le cordon d'alimentation est bien serré. Faites attention de ne pas le coincer, particulièrement au moment d'installer le four sous l'armoire.

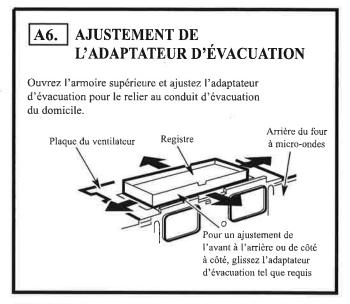
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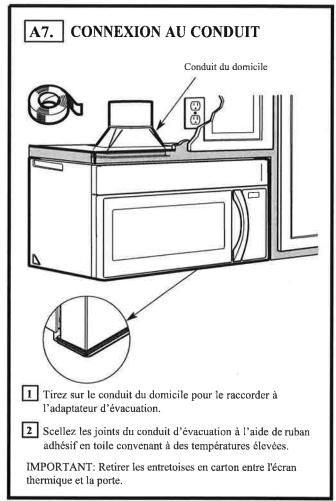
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#### Instructions d'installation







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#### Instructions d'installation

# ÉVACUATION À L'EXTÉRIEUR PAR L'ARRIÈRE

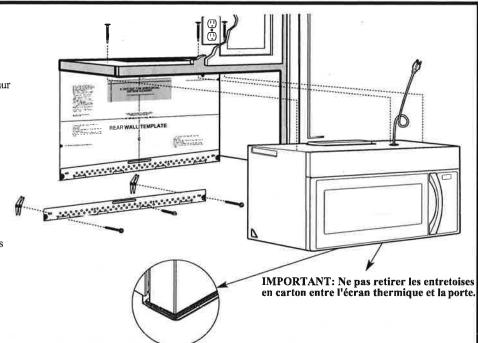
(Conduit horizontal)

#### **VUE D'ENSEMBLE** DE L'INSTALLATION

- B1. Préparation du mur arrière
- B2. Enlèvement de l'plaque du ventilateur
- B3. Fixation de la plaque de montage au mur
- B4. Préparation de l'armoire supérieure
- B5. Ajustement du ventilateur
- B6. Installation du four à micro-ondes

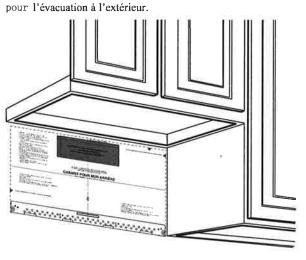
#### **REMARQUES IMPORTANTES:**

- · Assurez-vous que les vis du moteur du ventilateur et de la plaque du ventilateur sont solidement vissées lorsque vous les remettez en place. Cela évitera les vibrations excessives.
- Assurez-vous que les fils du moteur sont bien acheminés, fixés et qu'ils ne sont pas





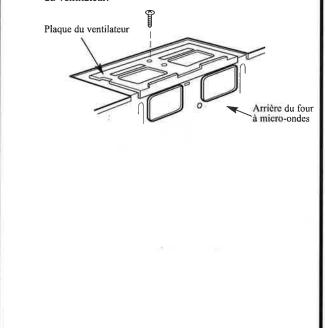
Vous devez percer une ouverture dans le mur arrière



- · Lisez les instructions figurant sur le GABARIT POUR MUR ARRIÈRE.
- · Collez-le au mur arrière.
- · Percez l'ouverture en suivant les instructions sur le GABARIT POUR MUR ARRIÈRE,

## B2. ENLÈVEMENT DE L'PLAQUE DU VENTILATEUR

Enlevez et conservez la vis qui retient la plaque du ventilateur au four à micro-ondes. Soulevez la plaque du ventilateur.

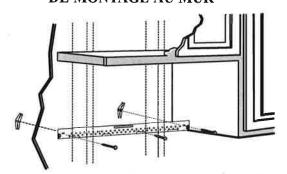


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#### Instructions d'installation

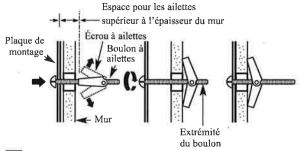
#### FIXATION DE LA PLAQUE DE MONTAGE AU MUR



Fixez la plaque au mur à l'aide des boulons à ailettes. Vous devez utiliser au moins une vis à bois pour fixer la plaque

- 1 Enlevez les écrous à ailettes des boulons.
- Insérez les boulons dans la plaque de montage à travers les trous dans le gypse et réassemblez les écrous à ailettes, à 3/4 po (19 mm) sur chaque boulon.

#### Pour utiliser les boulons à ailettes :



3 Placez la plaque de montage contre le mur et insérez les écrous à ailettes dans les trous du mur pour fixer la plaque.

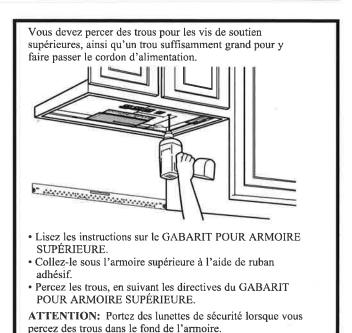
REMARQUE: Avant de resserrer les boulons à ailettes et la vis à bois, assurez-vous que la plaque est bien centrée sous l'armoire et que les languettes de la plaque de montage touchent le dessous de l'armoire lorsque vous poussez la plaque contre le mur.

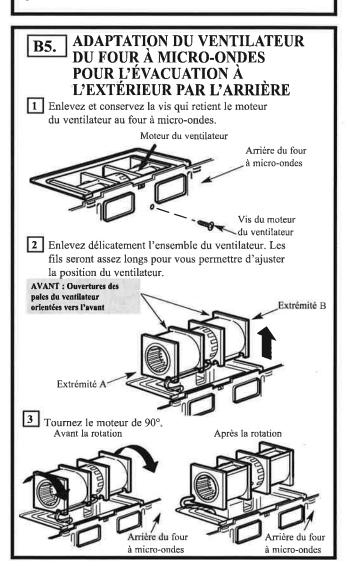
ATTENTION: Faites attention de ne pas vous pincer les doigts entre l'arrière de la plaque de montage et le mur.

4 Serrez tous les boulons. Tirez sur la plaque pour faciliter le serrage des boulons.

#### UTILISATION DU GABARIT **B4.** POUR ARMOIRE SUPÉRIEURE POUR LA PRÉPARATION DE L'ARMOIRE SUPÉRIEURE

Vous devez percer des trous pour les vis de soutien supérieures, ainsi qu'un trou suffisamment grand pour y faire passer le cordon d'alimentation.





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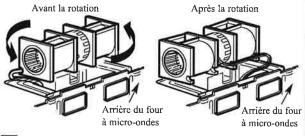
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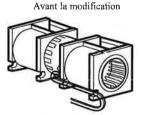
#### Instructions d'installation

#### **B5.** | ADAPTATION DU VENTILATEUR DU FOUR À MICRO-ONDES POUR L'ÉVACUATION À L'EXTÉRIEUR PAR L'ARRIÈRE (suite)

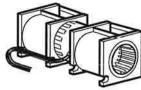
4 Retournez l'ensemble du ventilateur dans le sens contraire des aiguilles d'une montre, sur 180°.



5 Enlevez délicatement les fils des encoches. Replacez les fils dans les encoches de l'autre côté de l'ensemble du ventilateur.



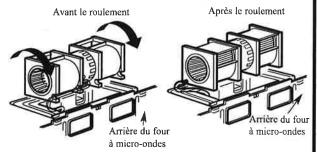
Après la modification



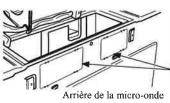
Les fils sont acheminés à travers le côté droit

Les fils sont acheminés à travers le côté gauche

6 Tournez le moteur de 90° afin que les ouvertures des pales du ventilateur soient orientées vers l'arrière du four à micro-ondes.

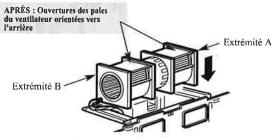


Retirez les plaques d'enfoncement à l'arrière de l'appareil par le biais de ciseaux (à tôle). (Pour certains modèles)



Plaques d'enfoncement : découpez les 4 toiles situées sur chaque panneau d'enfoncement et retirez les débouchures métalliques pour une aération provenant de l'arrière. Veuillez vous assurer de vous débarrasser de tous les bords tranchants, qui auraient été créés en enlevant les plaques d'enfoncement

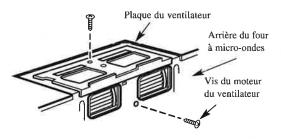
8 Replacez l'ensemble du ventilateur dans l'ouverture.



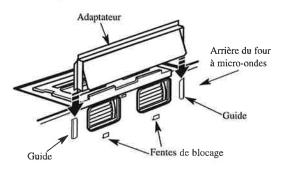
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ATTENTION: Ne tirez pas sur les fils de l'ensemble du ventilateur et ne les étirez pas. Assurez-vous que les fils ne sont pas coincés et qu'il sont fixés solidement. REMARQUE: Les ouvertures de l'ensemble du ventilateur doivent correspondre aux ouvertures de ventilation à l'arrière du four à micro-ondes.

9 Fixez l'ensemble de ventilateur au four à micro-ondes en utilisant la vis d'origine.



- [10] Replacez la plaque du ventilateur au même endroit qu'avant avec la vis. Assurez-vous que la vis est bien serrée.
- Fixez l'adaptateur d'évacuation à l'arrière du four en le coulissant dans les guides situés au centre, à la partie supérieure arrière du four.



Insérez-le jusqu'à ce qu'il soit dans les fentes de blocage inférieures. Assurez-vous que la charnière du registre est installée sur le dessus et que le registre bouge librement.

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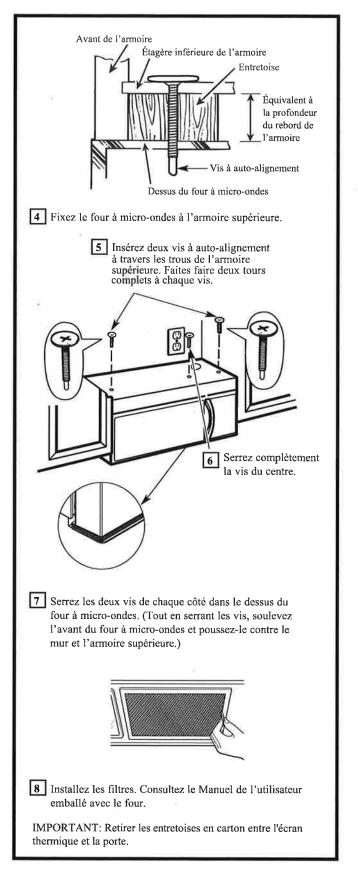
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moment d'installer le four sous l'armoire.



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#### Instructions d'installation

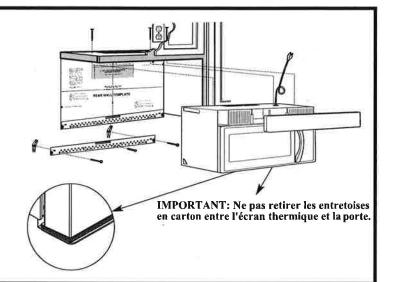
# RECYCLAGE D'AIR (évacuation sans conduit)

#### **VUE D'ENSEMBLE DE L'INSTALLATION**

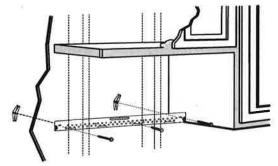
- C1. Fixation de la plaque de montage au mur
- C2. Préparation de l'armoire supérieure
- C3. Vérification de l'plaque du ventilateur
- C4. Installation du four à micro-ondes
- C5. Installation ou changemeut du filtre à charbon

#### **REMARQUES IMPORTANTES:**

- Assurez-vous que les vis du moteur du ventilateur et de la plaque du ventilateur sont solidement vissées lorsque vous les remettez en place. Cela évitera les vibrations excessives.
- · Assurez-vous que les fils du moteur sont bien acheminés, fixés et qu'ils ne sont pas coincés.

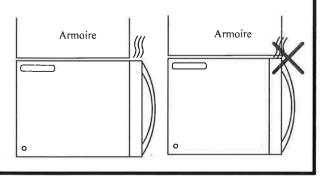


#### C1. FIXATION DE LA PLAQUE **DE MONTAGE AU MUR**



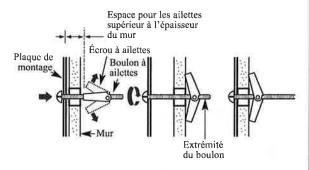
Fixez la plaque au mur à l'aide des boulons à ailettes. Vous devez utiliser au moins une vis à bois pour fixer la plaque à un montant.

REMARQUE: Si la profondeur du armoire incluant les portes du armoire est plus de 13" alors l'unité doit être espacée du mur utilisant des matériaux adéquats supportant 150 lbs pour permettre une bonne ventilation d'air au sommet/admission d'air.



- 1 Enlevez les écrous à ailettes des boulons.
- 2 Insérez les boulons dans la plaque de montage à travers les trous dans le gypse et réassemblez les écrous à ailettes, à 3/4 po (19 mm) sur chaque boulon.

#### Pour utiliser les boulons à ailettes :



3 Placez la plaque de montage contre le mur et insérez les écrous à ailettes dans les trous du mur pour fixer la

REMARQUE: Avant de resserrer les boulons à ailettes et la vis à bois, assurez-vous que la plaque est bien centrée sous l'armoire et que les languettes de la plaque de montage touchent le dessous de l'armoire lorsque vous poussez la plaque contre le mur.

ATTENTION: Faites attention de ne pas vous pincer les doigts entre l'arrière de la plaque de montage et le mur.

4 Serrez tous les boulons. Tirez sur la plaque pour faciliter le serrage des boulons.

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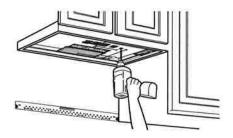
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#### Instructions d'installation

#### **UTILISATION DU GABARIT** C2. POUR ARMOIRE SUPÉRIEURE POUR LA PRÉPARATION DE L'ARMOIRE SUPÉRIEURE

Vous devez percer des trous pour les vis de soutien supérieures, ainsi qu'un trou suffisamment grand pour y faire passer le cordon d'alimentation.



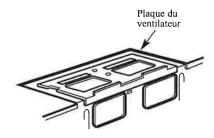
- Lisez les instructions sur le GABARIT POUR ARMOIRE SUPÉRIEURE.
- Collez-le sous l'armoire supérieure à l'aide de ruban

REMARQUE: Ajustez correctement le haut du gabarit si le micro-ondes devient espacé du mur à cause de la profondeur du armoire (incluant les portes du armoire) de plus de 13".

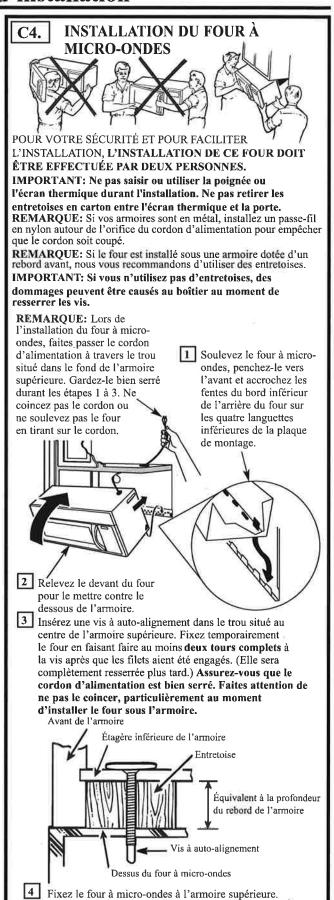
• Percez les trous, en suivant les instructions du GABARIT POUR ARMOIRE SUPÉRIEURE.

ATTENTION: Portez des lunettes de sécurité lorsque vous percez des trous dans le fond de l'armoire.





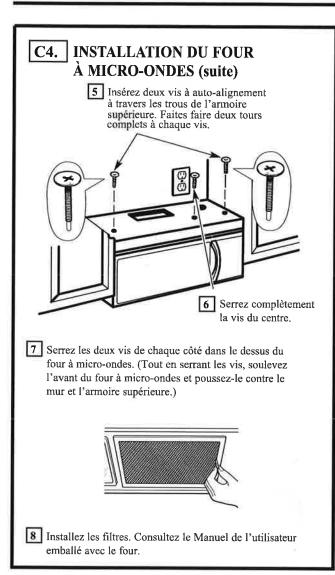
- Placez le four à micro-ondes en position debout, le dessus de l'appareil sur le dessus.
- Inspectiez pour affirmer le ventilateur metal est installez dans la cavité.



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#### Instructions d'installation

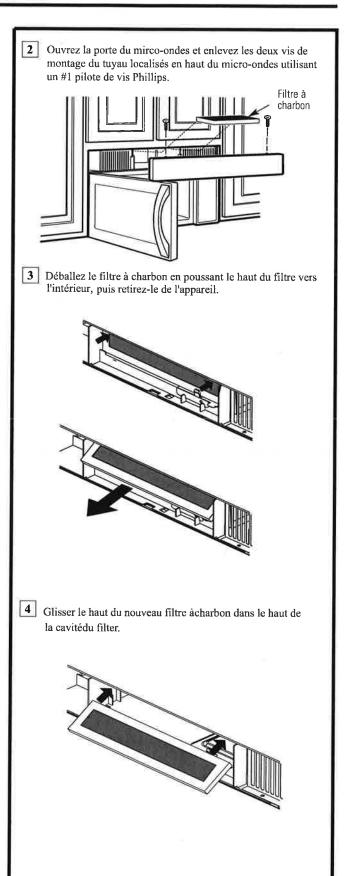




REMARQUE: Le filtre à charbon de bois est installé d'usine dans certains modèles. Reférez-vous à l'utilisation et soin pour voir si le vôtre est installé d'usine et pour l'information de remplacement.

Pour le modèle sans la porte d'accès au filtre de recirculation, suivez ces étapes pour remplacer ou installer un filtre à charbon de bois.

1 Débranchez le four à micro-ondes ou déconnectez l'alimentation.



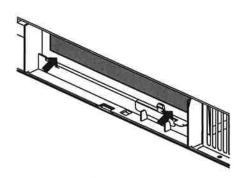
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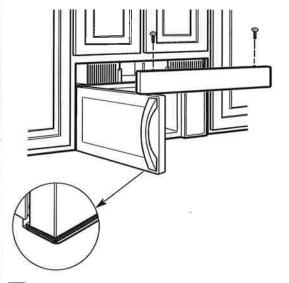
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#### Instructions d'installation

5 Appuyez sur le fond du filtre àcharbon pour le placer dans la position correcte.



6 Réinstallez le tuyau en faisant glisser l'arrière du tuyau en place. Poussez le haut du tuyau en position et faites le bien glisser en pace. Replacez les deux vis de montage du tuyau localisés en haut du mirco-ondes utilisant un #1 pilote de vis Phillips.



7 Fermez la porte du micro-ondes. Branchez le four à microondes ou reconnectez l'alimentation.

IMPORTANT: Retirer les entretoises en carton entre l'écran thermique et la porte.

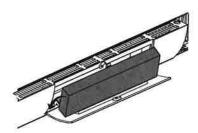
Pour le modèle avec la porte d'accès au filtre de recirculation, suivez ces étapes pour remplacer ou installer un filtre PureAir MD. 1 Déballez le filtre PureAir MD et secouez-le pour retirer tout résidu de charbon. 2 À l'aide d'un tournevis cruciforme Phillips, dévissez la porte du compartiment du filtre PureAir MD. 3 Ouvrez la porte du compartiment du filtre. Tirez l'ancien filtre PureAir MD (le cas échéant) hors de l'appareil pour l'enlever.

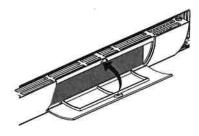
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# Instructions d'installation

5 Dans l'orifice situé au dos de la porte, placez obliquement le nouveau filtre PureAir MDet rabattez-le jusqu'à ce qu'il soit à la verticale et bien fixé dans son emplacement dédié.





6 Veillez à ce que le filtre PureAir MD soit bien encastré et à la verticale. Fer mez la porte et revissez les vis. Votre filtre PureAir MD est prêt à l'emploi.

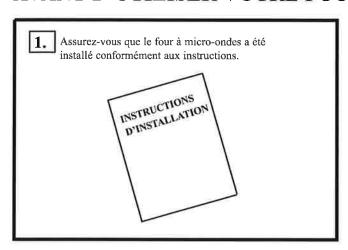
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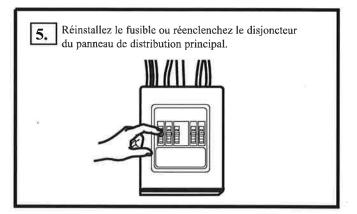
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# Instructions d'installation

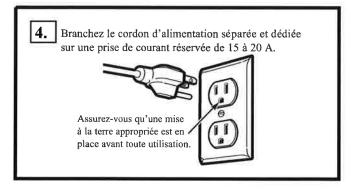
# AVANT D'UTILISER VOTRE FOUR À MICRO-ONDES

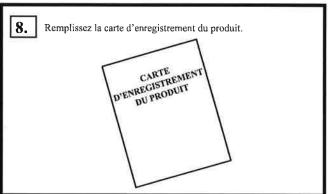




- 2. Enlevez tout le matériel d'emballage du four
- Installez le plateau tournant et la plateau en verre dans le four à micro-ondes.
- **6.** Lisez le manuel d'utilisation et d'entretien. MANUEL DE LUTILISATEUR





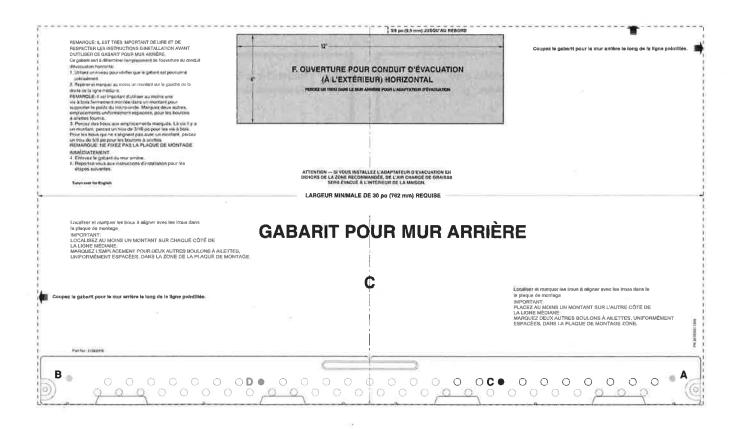


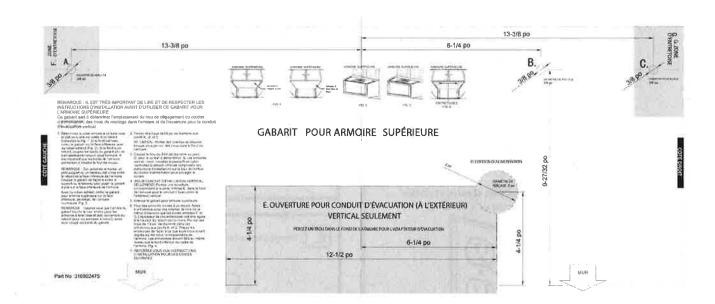
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# Instrucciones de instalación

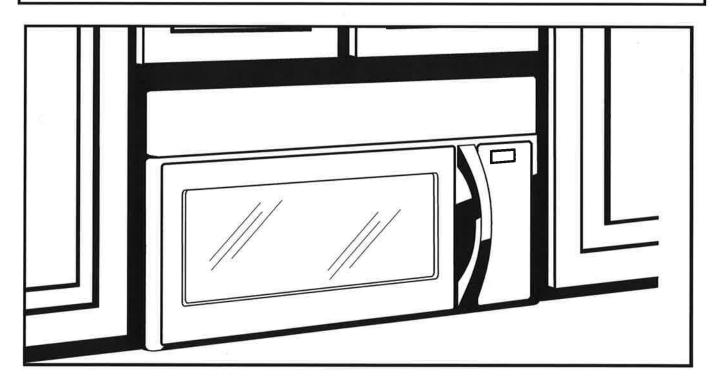
# Horno microondas (encima de la estufa)

¿Preguntas? Llame al 1-800-944-9044(US) o 1-800-265-8352(Canada)

#### ANTES DE EMPEZAR

Lea estas instrucciones completamente y con atención.

- IMPORTANTE: conserve estas instrucciones para uso futuro del inspector local.
- · IMPORTANTE: asegúrese de que se cumplan todas las normas y los códigos relevantes.
- · Nota para el instalador: asegúrese de dejar estas instrucciones en manos del consumidor.
- Nota para el consumidor: conserve estas instrucciones para referencia futura.
- Nivel de preparation tecnica: la instalacion de este electrodomestico requiere conocimientos mecánicos y eléctricos básicos.
- La instalacion correcta es responsabilidad del instalador.
- · Las fallas del producto que resulten de una instalación incorrecta no están cubiertas bajo la garantía.



LEA CUIDADOSAMENTE. **CONSERVE ESTAS INSTRUCCIONES.** 

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# Instrucciones de instalación

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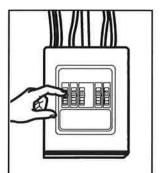
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#### Instrucciones de instalación

#### INSTRUCCIONES IMPORTANTES SOBRE SEGURIDAD

Este product require un tomacorriente de tres clavijas con puesta a tierra. Antes de proceder con la instalación del electrodoméstico, el instalador debe realizar una verificación de la continuidad de la puesta a tierra del tomacorriente, a fin de asegurarse de que es correcta. Si la puesta a tierra no es correcta o si el tomacorriente no cumple con los requisites eléctricos descritos en este manual (en la sección REQUISITOS ELÉCTRICOS), se deberá solicitor a un eléctricista calificado que corrija cualquier defecto detectado.



PRECAUCIÓN: por razones de seguridad personal, antes de comenzar con el procedimiento de instalación, retire el fusible correspondiente o desconecte el disyuntor doméstico, a fin de evitar cualquier lesion personal causada por un choque eléctric.

PRECAUCIÓN: por razones de seguridad personal, la superficie de instalación debe ser capaz de soportar la carga del gabinete, además del peso adicional del product (63 a 85 libras o 28,5 a 38,5kg), así como cargas adicionales de hasta 50 libras (22,7kg), o bien un peso total de 113 a 135 libras (51,3 a 61,2kg).

PRECAUCIÓN: por razones de seguridad personal, este product no puede ser instalado en espacios de gabinete tipo insular o peninsular. Debe ser atornillado (instalado) TANTO al gabinete superior, COMO a la pared.

NOTA: por razones de seguridad personal y para facilitar la instalación, se recomienda que dos personas instalen el product.

IMPORTANTE: ¡LEA CUIDADOSAMENTE! POR RAZONES DE SEGURIDAD PERSONAL, EL ELECTRODOMÉSTICO DEBE QUEDAR DEBIDAMENTE PUESTO A TIERRA, PARA EVITAR CUALQUIER CHOQUE ELÉCTRICO QUE PUEDA CAUSAR LA MUERTE.



El cable de alimentación de este product está de este product está equipado con un enchufe (con puesta a tierra) de 3 clavijas, compatible con un tomacorriente de pared (con puesta a tierra) de 3 clavijas, lo cual minimize la posibilidad de choque eléctric causado por el producto.

Se debe solicitor a un eléctricista calificado que inspeccione el tomacorriente de pared y el circuito eléctrico correspondiente, a fin de asegurarse de que el tomacorriente esté debidamente puesto a tierra.

En caso de que el tomacorriente estándar disponible sea solamente para un enchufe de dos clavijas, es muy importante solicitor a un eléctricista calificado que lo reemplace con un tomacorriente de tres clavijas puesto a tierra. BAJO NINGUNA CIRCUNSTANCIA CORTE, ALTERE O ELIMINE LA TERCERA CLAVIJA (TIERRA) DEL CABLE ELÉC-TRICO. NO USE UN CABLE ELÉCTRICO DE EXTENSIÓN.

#### REQUISITOS ELÉCTRICOS

La potencia nominal del product es de 120 voltios de CA, 60 Hertz, 15 amperios y 1,6 kilovatios. Debe ser conectado a un circuito separado y dedicado de alimentación eléctrica que tenga el voltaje y la frecuencia adecuados. El diámetro del alambre debe cumplir con los requisitos correspondientes del código eléctrico nacional (National Eléctrical Code O NEC) de los EE.UU., o bien con las normas vigentes locales correspondientes a la potencia nominal en kilovatios del apparato. El cable y el enchufe de alimentación eléctrica deben ser conectados a un tomacorriente (con puesta a tierra) de un circuito separado y dedicado de 15 a 20 amperios. El tomacorriente debe estar situado en el espacio superior del gabinete en el cual se instalará el microondas. El tomacorriente y el circuito de alimentación eléctrica deben ser instalados por un eléctricista calificado y deben cumplir con el código NEC de los EE.UU. o con las normas vigentes locales correspondientes.

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# Instrucciones de instalación

# **DAÑOS-ENVÍO (TRANSP** -ORTE)/INSTALACIÓN

- Si el producto ha resultado dañado durante su envío (transporte), devuélvalo a la tienda/el almacén donde to adquirió, para que lo reparen o lo cambien por uno nuevo.
- Si el producto ha sido dañado por el comprador, la reparación o el reemplazo del producto es responsabilidad del comprador.
- Si el instalador (no el comprador) daña el producto, la reparación o el reemplazo del mismo tendrá que ser acordado entre el comprador y el instalador.

#### **PIEZAS INCLUIDAS**

#### KIT DE FERRETERÍA

PIEZA		CANTIDAD
	Tornillos para madera	2
<b>-</b>	Tomillos de fiador (y tuercas de mariposa) ( 3% a" x 3")	2
1	Tornillos autoalinea -ntes para máquina (¼"-28 x3¼")	3
COMMISSION OF THE PARTY OF THE	Moldura aislante de nylon (para los gabinetes metálicos)	Ť

Las piezas de ferretería vienen dentro de un paquete (kit) incluido con el electrodoméstico. Verifique que el paquete contiene todas las piezas listadas aquí.

NOTA: se incluyen algunas piezas adicionales.

# PIEZAS INCLUIDAS (CONT.) KIT DE FERRETERÍA

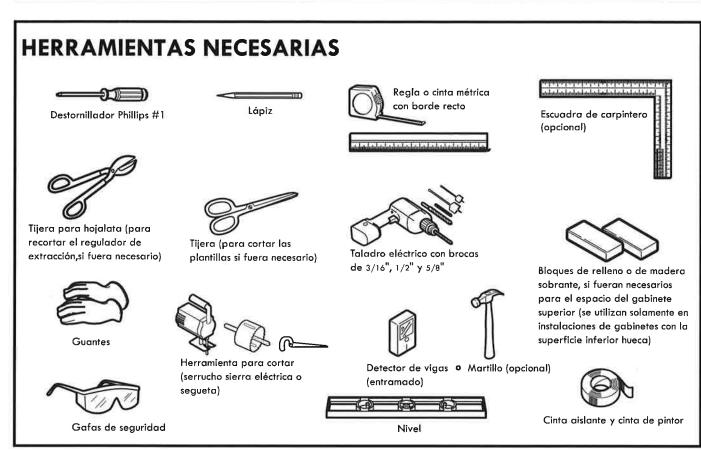
PIEZA		CANTIDAD
	Plantilla para el gabinete superior	
	Plantilla para la pared trasera combinado	1
DE INSTALACIÓN  GUÍA DE USO Y CUIDADO	Instrucciones de instalacion	1
	Guia de Uso y Cuidado	1
	Filtros de grasa (empacados por separado)	2
	Adaptador	1
a (a)	Bandeja de vidrio	1
	Anillo de la bandeja giratoria	1
Param algunos modelos	Estante de alambre de convección	1
Param algunos modelos	Estante	ī
Param algunos modelos	Filtro PureAir® de microondas	ī

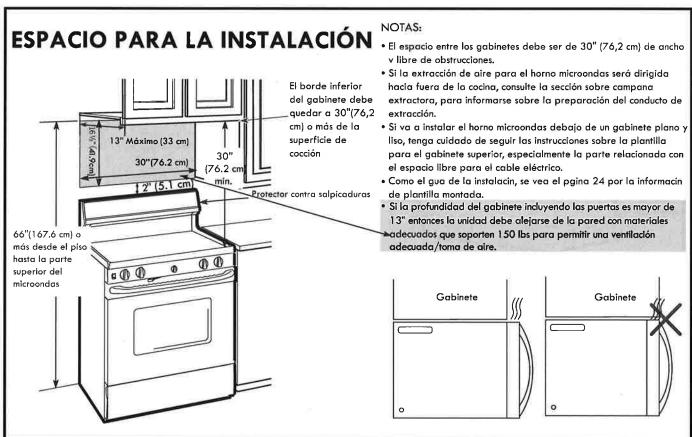
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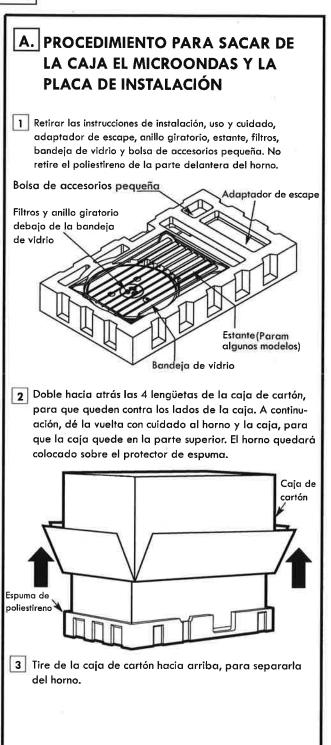


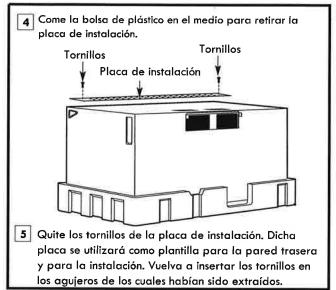
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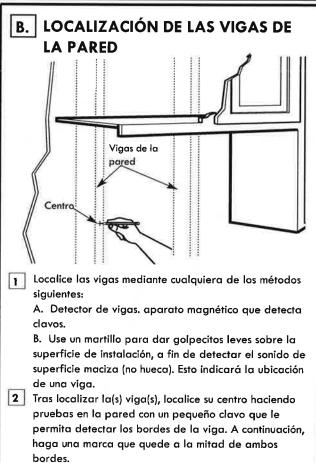
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## Instrucciones de instalación

# COLOCACIÓN DE LA PLACA DE INSTALACIÓN







El centro de cualquier viga adyacente debe quedar a 16" (40,6 cm) o 24" (61 cm) de dicha marca. Trace una línea hacia abajo del centro de las vigas. EL MICROONDAS DEBE QUEDAR ATORNILLADO AL

MENOS A UNA VIGA DE LA PARED

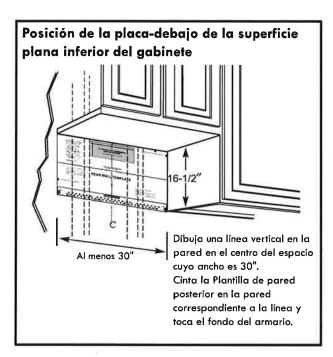
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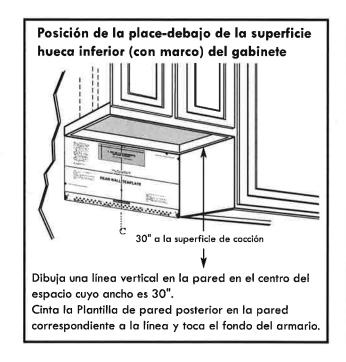
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#### Instrucciones de instalación

# UBICACIÓN DE LA PLACA PARA LA PARED DE BAJO DEL GABINETE





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Posición de la placa-debajo de la superficie hueca saliente, delantera e inferior (con marco) del gabinete Trace una línea en el fundo de la pared igal a la profundidad del voladizo delantero perficie de cocción Es posible que sus gabinetes tengan molduras decorativas que interfieran con la instalación del microondas. En este caso, quite dichas molduras para poder instalar correctamente el microondas y que quede nivelado.

#### EL MICROONDAS DEBE QUEDAR NIVELADO.

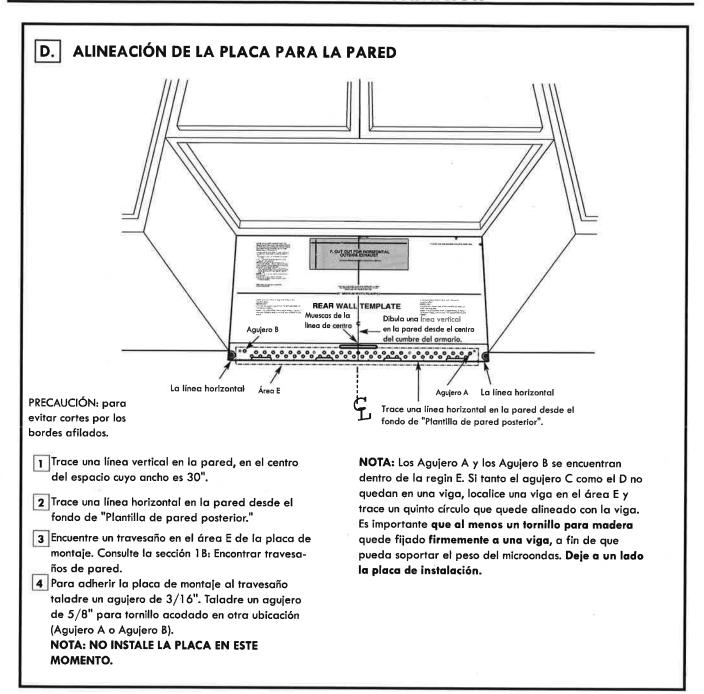
Use un nivel para asegurarse de que la superficie inferior del gabinete esté nivelada. Si el gabinete tiene solamente una parte delantera saliente, sin parte trasera o lateral del marco, instale la placa de instalación a la misma distancia que la distancia de profundidad de la parte saliente delantera. Esto mantendrá el microondas nivelado.

- 1 Mida la distancia de profundidad interior de la parte saliente delantera.
- Trace una línea horizontal en la pared trasera, debajo de la superficie inferior del gabinete, a una distancia igual que la distancia de profundidad interior de la
- parte saliente delantera. Solamente en el caso de este tipo de instalación con parte saliente delantera, alinee las lengüetas de instalación con dicha línea horizontal, sin tocar la superficie inferior del gabinete, como se describe en el paso D.

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# Instrucciones de instalación



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# Instrucciones de instalación

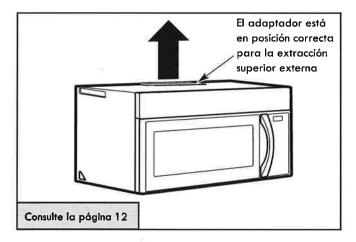
TIPOS DE INSTALACIÓN (A Elección Entre A, B o C)

Este horno microondas está diseñado para adaptarse a los tres tipos siguientes de ventilación:

- A. Extracción superior externa (conducto vertical)
- B. Extracción trasera externa (conducto horizontal)
- C. Recirculación (sin conducto de extracción)

NOTA: este horno microondas se ha fábricado para un sistema de Recirculación. Seleccione el tipo de ventilación necesario para su instalación y proceda con las instrucciones de la sección correspondiente.

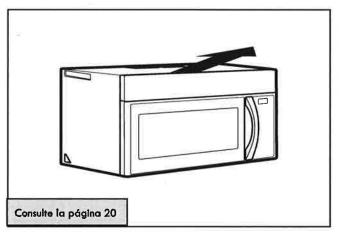
#### **EXTRACCIÓN SUPERIOR EXTERNA** (CONDUCTO VERTICAL)



#### EXTRACCIÓN TRASERA EXTERNA (CONDUCTO HORIZONTAL)



#### **RECIRCULACIÓN** (SIN CONDUCTO DE EXTRACCIÓN)



Los modelos fábricados para un sistema de extracción basado en la recirculación del aire vienen con la instalación de fábrica de un filtro de carbón, el cual ayuda a eliminar el humo/los vapores y los olores.

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NOTA: lea las dos páginas siguientes solamente si va a instalar un sistema de extracción hacia el exterior. Si tiene planeado realizar una instalación basada en la recirculación del aire dentro de la cocina, continúe con la páging 20.

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## Instrucciones de instalación

# INSTRUCCIONES DE INSTALACIÓN DE CONDUCTOS DE ESCAPE EXTERNAS

NOTA: en caso de que sea necesario instalar conductos, tenga en cuenta que el largo total de los conductos. rectangulares (ancho de 3 1/4" × 10" v 8,2 cm  $\times$  25,4 cm) o redondos (diámetro de 5" ó 12,7 cm) /(diámetro de 6" ó 15,2 cm) NO debe ser superior a 120 pies (36,5 m). La ventilación exterior requiere el uso de un CONDUCTO PARA CAMPANA EXTRACTORA. Lea con atención las siguientes recomendacio-

NOTA: es importante que se instale el sistema de ventilación siguiendo la ruta más directa y con el menor número posible de codos. Esto garantizará la salida fluida del aire por los conductos de extracción y evitará cualquier bloqueo. Asimismo, asegúrese de que los reguladores de extracción se muevan libremente y nada bloquee los conductos.

#### Conexión de escape

El adaptador fue diseñado para concordar con un ducto rectancular estpandar 31/4" x 10" (8.2 x 25.4 cm). Si se requiere de un ducto redondo, se debe utilizar un adaptador de transición.

Un ducto con un diámetro de 5" (12.7cm) / 6" (15.2cm) es aceptable.

Largo máximo del conducto:

Para lograr una salida satisfactoria del aire, el largo total del conducto rectangular con un ancho de 3 1/4"  $\times$  10" (8,2  $\times$  25,4 cm) o redondo con un diámetro de 5" (12,7 cm) /6" (15,2 cm) no debe ser mayor que 120 pies (36,5 m).

Los codos, los adaptadores, las tapas de salida al techo o a la pared, etc., representan áreas de resistencia adicional al flujo del aire y son equivalentes a una sección de conducto recto cuyo largo es mayor que su tamaño físico real. Cuando calcule el largo total del conducto, añada el largo equivalente de cada uno de los adaptadores, codos, etc., más el largo de todas las secciones rectas del conducto. La tabla siguiente contiene infonnación para saber cómo calcular el largo total (en medidas equivalentes) del sistema de conductos, a partir del largo aproximado en pies de algunos conductos/adaptadores/codos, etc. estándar.

PIEZAS DEL CONDUCTO		LARGO (MEDIDAS EQUIVALENTES)	x	No DE UNIDADES- UTILIZADAS	=	LARGO (MEDIDAS EQUIVALENTES)
	Adaptador de unión entre el conducto rectangular y el redondo*	5 pies (1,5 m)	x	( )	=	Pies o m (metros)
	Tapa de salida a la pared	40 pies (1 2,2 m)	x	( )	:=	Pies o m (metros)
	Codo de 90°	10 pies (3 m)	x	( )	=	Pies o m (metros)
	Codo de 45°	5 pies (1,5m)	x	( )	#	Pies o m (metros)
	Codo de 90°	25 pies (7,6 m)	x	( )	₹.	Pies o m (metros)
	Codo de 45°	5 pies (1,5 m)	x	( )	=	Pies o m (metros)
	Tapa d salida al techo	24 pies (7,3 m)	x	( )		Pies o m (metros)
	Conducto recto redondo de 6" (15,2 cm) de diámetro o rectangular de 31/4" × 10" (8,2 × 25,4 cm) de ancho	1 pies (0,3m)	×	( )	#I	Pies o m (metros)
Largo total del sistema de conductos =						Pies o m (metros)



\*IMPORTANTE: si se utiliza un adaptador de unión entre el conducto rectangular y el redondo, los bordes inferiores del regulador de extractión tendrán que ser recortados (con una tijera para hojalata), a fin de que se ajusten y permitan el libre mocvimiento del regulador.

Los largos (en medidas equivalentes) de las piezas del conducto están basados en pruebas reales y se ajustan a los requisitos para un buen rendimiento de ventilación con cualquier campana eatractora.

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## Instrucciones de instalación

#### CONDUCTOS DE ESCAPE EXTERNAS

#### **EXTRACCIÓN SUPERIOR EXTERNA (SÓLO EJEMPLO)**

La siguiente tabla contiene un ejemplo de uno posible instalación de un sistema de conducto de extracción.



PIEZAS DEL CONDUCTO		LARGO (MEDIDAS EQUIVALENTES)	х	No DE UNIDADES- UTILIZADAS	=	LARGO (MEDIDAS EQUIVALENTES)
	Tapa d salida al techo	24 pies (7,3 m)	x	(1)	=	24 pies (7,3 m)
	Conducto recto de 12 pies (3,6 m) y diámetro de 6" (15,2 cm)	12 pies (3,6 m)	×	(1)		12 pies (3,6 m)
	Adaptador de unión entre el conducto rectangular y el redondo*	5 pies (1,5 m)	x	(1)	Ш	5 pies (1,5 m)
Los largos (en medidas equivalentes) de las piezas del conducto están basados en pruebas reales y se ajustan a los requisitos para un buen rendimiento de ventilación Largo total del sistema de conductos = con cualquier campana extractora.						41 pies (12,5 m)

<sup>\*</sup> IMPORTANTE: si se utiliza un adaptador le unión entre el conducto rectangular y el redondo, los bordes inferiores del regulador de extracción tendrán que ser recortados (con una tijera para hojalata), a fin de que se ajusten y permitan el libre movimiento del regulador.

#### EXTRACCIÓN TRASERA EXTERNA (SÓLO EJEMPLO)

La siguiente tabla contiene un ejemplo de una posible instalación de un sistema de conducto de extracción.

	PIEZAS DEL CONDUCTO		LARGO (MEDIDAS EQUIVALENTES)	×	No DE UNIDADES- UTILIZADAS	=	LARGO (MEDIDAS EQUIVALENTES)
A		Tapa de salida a la pared	40 pies (12, 2 m)	x	(1)	=	40 pies (12, 2 m)
		Conducto recto rectangular de 3 pies (0,9 m) de largo (3 y $1/4$ " $\times$ 10" (8,2 cm $\times$ 25,4 cm) de ancho	3 pies (0.9 m)	×	(1)	Ξ	3 pies (0.9 m)
		Codo de 90°	10 pies (3 m)	x	(2)	Ħ	20 pies (3 m)
	Los largos (en medidas equivalentes) de las piezas del conducto están basados en pruebas reales y se ajustan a los requisitos para un buen rendimiento de ventilación Largo total del sistema de conductos = con cualquier campana extractora.						63 pies (19,2 m)

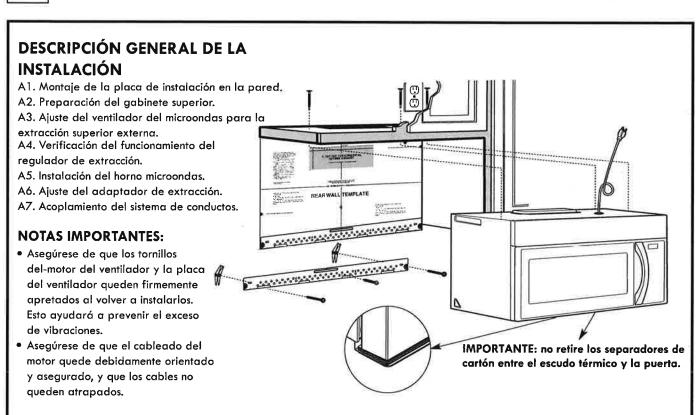
NOTA: en el caso de extracción por la parte trasera, hay que tener cuidado de alinear los conductos de extracción con el espacio entre las vigas (el entramado), o bien que la pared haya sido preparada durante su construcción para dejar suficiente espacio entre las vigas para el sistema de extracción.

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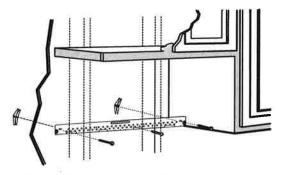
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#### Instrucciones de instalación

# **EXTRACCIÓN SUPERIOR EXTERNA** (conducto vertica)



# A1. MONTAJE DE INSTALACIÓN LA **PLACA DE EN LA PARED**



Fije la placa en la pared con los tornillos de fiador. Al menos un tornillo para madera debe ser utilizado para fijar la placa a una viga de la pared.

- Quite las tuercas de mariposa de los tornillos.
- Inserte los tornillos en la placa de instalación, a través de los agujeros taladrados en las partes de la pared que no son viga (los paneles) y vuelva a insertar las tuercas de mariposa hasta 3/4" (19 mm) de cada tornillo.

#### Para utilizar tomillos de fiador:

El espacio que ocupan los tornillos fiadores es superior al grueso de la pared Tuercas de mariposa Placa de Tomillo instalació

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- 3 Coloque la placa de instalación contra la pared e inserte las tuercas de mariposa en los agujeros de la pared, a fin de instalar la placa.
  - NOTA: antes de apretar los tornillos de fiador y el tornillo para madera, asegúrese de que las lengüetas de la placa de instalación toquen la parte inferior del gabinete cuando sean empujadas a ras contra la pared, y que la placa quede debidamente centrada bajo el gabinete.

PRECAUCIÓN: tenga cuidado de evitar que sus dedos queden atrapados entre la parte trasera de la placa de instalación y la

Apriete todos los tornillos. Tire de la placa alejándola de la pared, a fin de que resulte más fácil apretar los tornillos.

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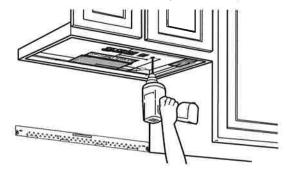
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#### Instrucciones de instalación

#### USO DE LA PLANTILLA PARA EL A2. **GABINETE SUPERIOR A FIN DE** PREPARAR EL ÁREA DE DICHO **GABINETE**

Es necesario taladrar agujeros para los tornillos de soporte superior, realizar un agujero lo suficientemente grande para que el cable eléctuco pueda pasar a través y recortar también un hueco to suficientemente amplio para el adaptador de extracción.

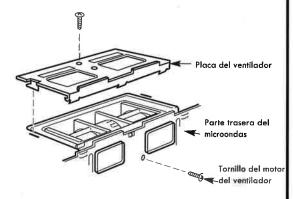


- Lea las instrucciones de la sección PLANTILLA PARA EL GABINETE SUPERIOR.
- Adhiera con cinta la plantilla al gabinete superior.
- Taladre los agujeros, siguiendo las instrucciones de la sección PLANTILLA PARA EL GABINETE SUPERIOR.

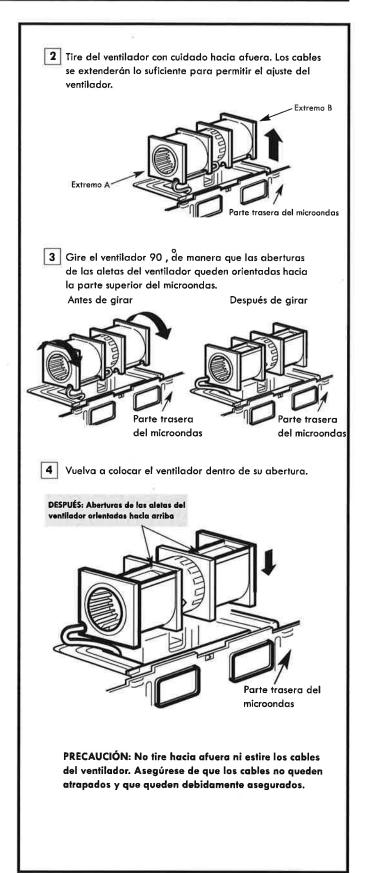
PRECAUCIÓN: cuando taladre los agujeros en la superficie inferior del gabinete, use gafas protectoras.

#### A3. AJUSTE DEL VENTILADOR DEL MICROONDAS PARA LA EXTRAC-CIÓN SUPERIOR EXTERNA

Coloque el microondas en posición vertical, con la parte superior hacia arriba.



Quite el tornillo que sujeta la placa del ventilador al microondas. Quite y guarde el tornillo que sujeta el motor del ventilador al microondas.



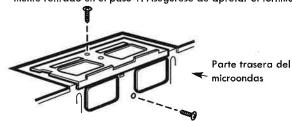
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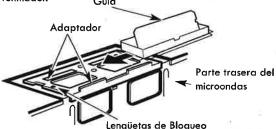
#### Instrucciones de instalación

#### A3. AJUSTE DEL VENTILADOR DEL MICROONDAS PARA LA EXTRAC-CIÓN SUPERIOR EXTERNA

- 5 Fije el ventilador al microondas con el tornillo previamente retirado en el paso I. Asegúrese de apretar el tornillo.
- 6 Vuelva a fijar la placa del ventilador con el tornillo previamente retirado en el paso 1. Asegúrese de apretar el tornillo.



7 Instale el adaptador de extracción en la parte superior del placa del ventilador, deslizándolo por las guías situadas en la parte central superior de la parte superior del placa del ventilador.



Empuje hacia adentro hasta que encaje en las lengüetas de bloqueo inferiores. Tenga cuidado de asegurarse de que la bisagra del regulador de extracción esté instalada de manera que quede movible libremente.

#### A4. VERIFICACIÓN DEL FUNCIONA-MIENTO CORRECTO DEL REGU-LADOR DE EXTRACCIÓN

Placa del ventilador Adaptador de extracción Regulador de extracción

- Antes de instalar el microondas, asegúrese de que la cinta adhesiva que protege el regulador de extracción haya sido retirada y que el regulador se mueve fácilmente.
- Una vez instalado el microondas, necesitará realizar ajustes para asegurarse de lograr la alineación correcta con el conducto de extracción de la cocina.

#### INSTALACIÓN DEL HORNO A5. **MICROONDAS**



POR RAZONES DE SEGURID PERSONAL Y PARA FACILITAR LA INSTALACIÓN, SE RECOMIENDA QUE DOS PERSONAS INSTALEN EL HORNO MICROONDAS.

IMPORTANTE:No agarre ni use la manija o el escudo térmico durante la instalación. No retire los separadores de cartón entre el escudo térmico y la puerta.

NOTA: si el gabinete es metálico, use una moldura aislante de nylon alrededor del agujero para el cable eléctrico, a fin de evitar cortes en el cable.

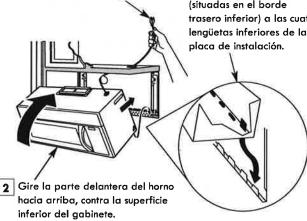
NOTA: se recomienda el uso de bloques de relleno si la parte delantera del gabinete sobresale debajo de la parte inferior del propio gabinete.

IMPORTANTE: Si no se usan bloques de relleno, pueden producirse daños en la carcasa por apretar demasiado los tornillos.

NOTA: cuando instale el horno microondas, ease el cable eléctrico a través del agujero correspondiente de la superficie inferior del gabinete superior Mantengalo tenso recto durante los pasos 1 a 3. No permita 1 que el cable quede atrapado ni levante el horno tirando del cable.

Levante el microondas, inclínelo hacia adelante y enganche las ranuras (situadas en el borde trasero inferior) a las cuatro lengüetas inferiores de la placa de instalación.

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3 Inserte un tornillo autoalineante a través del agujero del centro del gabinete superior. Fije temporalmente el horno apretando el tornillo al menos dos vueltas completas después de due el tornillo quede enroscado. (Más adelante se procederá a apretar completamente el tornillo.) Asegúrese de mantener tenso/recto el cable eléctrico. Tenga cuidado de evitar que el cable quede atrapado, especialmente al realizar la instalación del horno a ras contra la superficie inferior del gabinete.

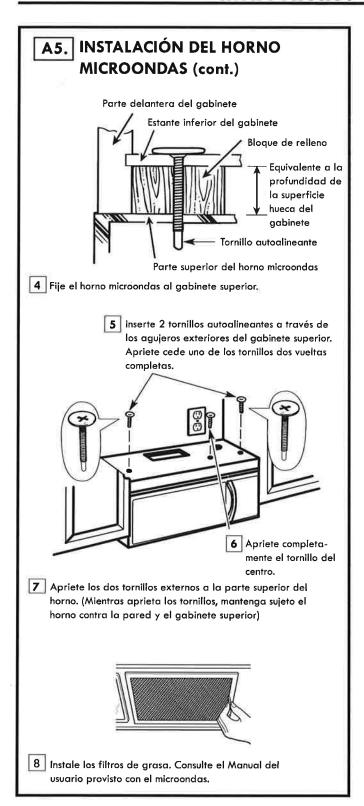
Parte trasera del microondas INDEX NO. 006569/2017

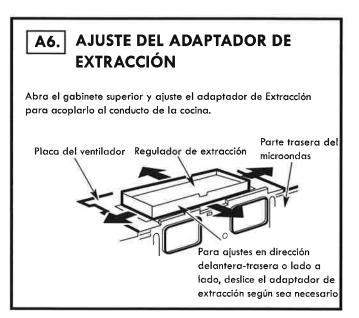
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#### Instrucciones de instalación







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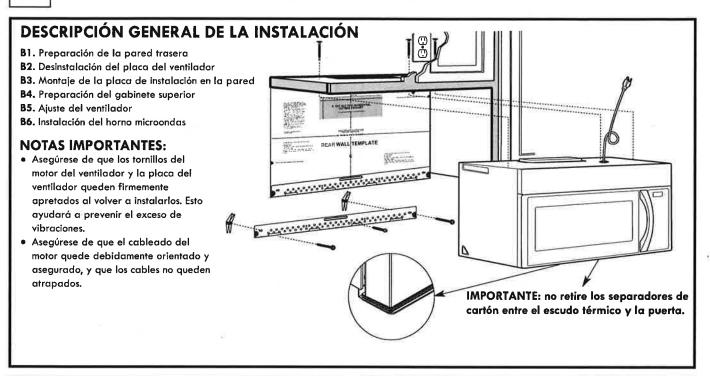
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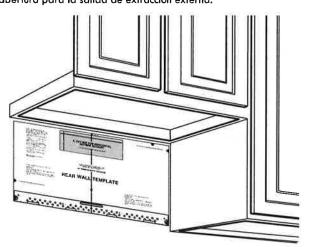
## Instrucciones de instalación

# **EXTRACCIÓN TRASERA EXTERNA** (Conducto Horizontal)



#### PREPARACIÓN DE LA PARED B1. TRASERA PARA LA SALIDA DE EXTRACCIÓN TRASERA EXTERNA

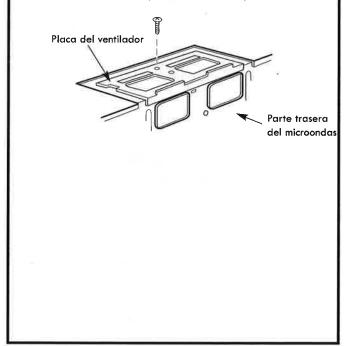
Es necesario realizar un corte en la pared trasera para crear una abertura para la salida de extracción externa.



- Lea las instrucciones de la sección PLANTILLA PARA LA PARED
- Adhiera con cinta la plantilla a la pared trasera, alineándola con los agujeros previamente taladrados pares coincidir con los agujeros A y B en la placa para la pared.
- Realice el corte de la abertura, siguiendo las instrucciones de la sección PLANTILLA PARA LA PARED TRASERA.

#### DESINSTALACIÓN DEL PLACA **B2. DEL VENTILADOR**

Quite y guarde el tornillo que sujeta la placa del ventilador al microondas. Levante la placa del ventilador para retirarla.



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#### Instrucciones de instalación

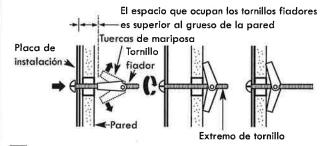
# **B3.** MONTAJE DE INSTALACIÓN LA PLACA DE EN LA PARED

Fije la placa en la pared con los tornillos de fiador. Al menos un tornillo para madera debe ser utilizado para fijar la

placa a una viga de la pared.

- 1 Quite las tuercas de mariposa de los tornillos.
- 2 Inserte los tornillos en la placa de instalación, a través de los agujeros taladrados en las partes de la pared que no son viga (los paneles) y vuelva a insertar las tuercas de mariposa hasta 3/4" (19 mm) de cada tornillo.

#### Para utilizar tornillos de fiador:



3 Coloque la placa de instalación contra la pared e inserte las tuercas de mariposa en los agujeros de la pared, a fin de instalar la placa.

NOTA: antes de apretar los tornillos de fiador y el tornillo para madera, asegúrese de que las lengüetas de la placa de instalación toquen la parte inferior del gabinete cuando sear empujadas a ras contra la pared, y que la placa quede debidamente centrada bajo el aabinete.

PRECAUCIÓN: tenga cuidado de evitar que sus dedos queden atrapados entre la parte trasera de la placa de instalación y la pared.

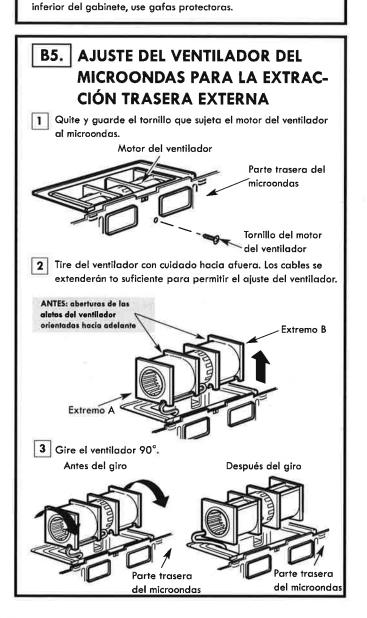
4 Apriete todos los tornillos. Tire de la placa alejándola de la pared, a fin de que resulte más fácil apretar los tornillos.

#### **B4. USO DE LA PLANTILLA PARA EL** GABINETE SUPERIOR A FIN DE PREPARAR EL AREA DE DICHO GABINETE

Es necesario taladrar agujeros para los tomillos de soporte superior, así como un agujero lo suficientemente, grande para que el cable eléctrico pueda pasar a través.



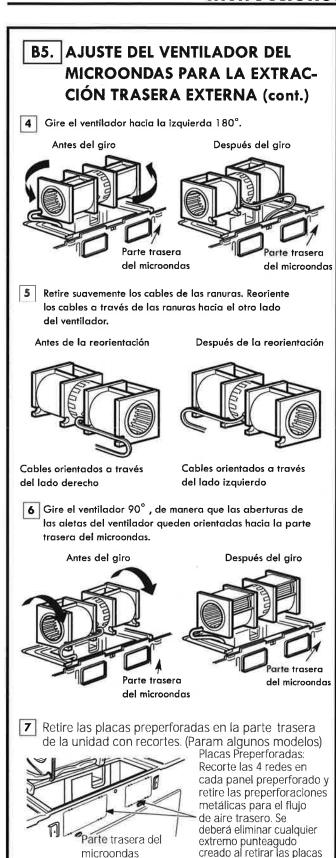
PRECAUCIÓN: cuando taladre los agujeros en la superficie

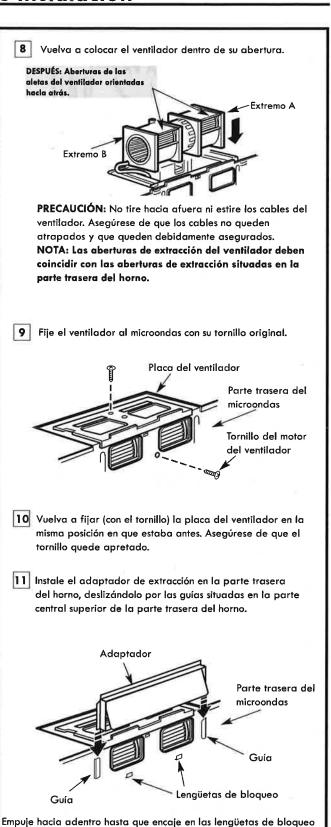


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## Instrucciones de instalación





inferiores. Tenga cuidado de asegurarse de que la bisagra del

parte superior y que se pueda mover libremente.

regulador de extracción esté instalada de manera que quede en la

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preperforadas.

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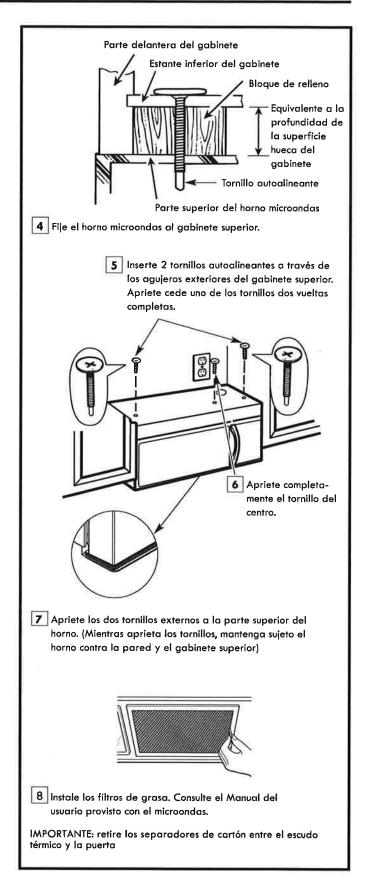
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#### Instrucciones de instalación

#### INSTALACIÓN DEL HORNO **B6**. **MICROONDAS** POR RAZONES DE SEGURIDAD PERSONAL Y PARA FACILITAR LA INSTALACIÓN, SE RECOMIENDA QUE DOS PERSONAS INSTALEN EL HORNO MICROONDAS. IMPORTANTE:No agarre ni use la manija o el escudo térmico durante la instalación. No retire los separadores de cartón entre el escudo térmico y la puerta. NOTA: Si el gabinete es metálico, use una moldura aislante de nylon alrededor del agujero para el cable eléctrico, a fin de evitar cortes en el cable. NOTA: Se recomienda el uso de bloques de relleno si la parte delantera del gabinete sobresale debajo del estante inferior del aabinete. IMPORTANTE: Si no se usan bloques de relleno, pueden producirse daños en la carcasa por apretar demasiado los NOTA: cuando instale el horno microondas, pase el cable eléctrico a través del agujero correspondiente de la superficie inferior del gabinete Levante el microondas. superior: Manténgalo inclínelo hacia adelante y tenso/recto durante los pasos enganche las ranuras 1 a 3. No permita que el (situadas en el borde cable avede atrapado ni trasero inferior) a las levante el horno tirando del cuatro lengüetas cable. inferiores de la placa de instalación. Gire la parte delantera del horno hacia arriba, contra la superficie inferior del gabinete. 3 Inserte un tornillo autoalineante a través del agujero del centro del gabinete superior: Fije temporalmente el horno apretando el tornillo al menos dos vueltas completas despisés de que el tornillo quede enroscado. (Más adelante se procederá a apretar completamente el tornillo.) Asegúrese de mantener tenso/recto el cable eléctrico. Tenga cuidado de evitar que el cable quede atrapado, especialmente al

realizar la instalación del horno a ras contra la superficie

inferior del gabinete.



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# Instrucciones de instalación

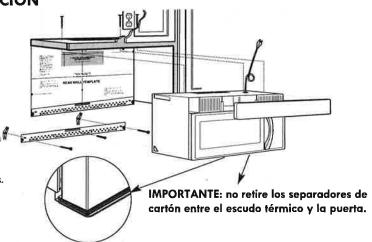
# RECIRCULACIÓN (Sin Conducto De Extracción)

#### DESCRIPCIÓN GENERAL DE LA INSTALACIÓN

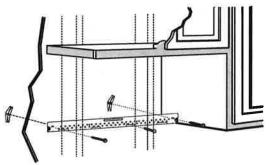
- C1. Montaje de la placa de instalación en la pared
- C2. Preparación del gabinete superior
- C3. Verificación del conjunto del Placa del Ventilador
- C4. Instalación del horno microondas
- C5. Instalación o cambiar del filtro de carbón

#### **NOTAS IMPORTANTES:**

- Asegúrese de que los tornillos del motor del ventilador y la placa del ventilador queden firmemente apretados al volver a instalarlos. Esto ayudará a prevenir el exceso de vibraciones.
- Asegúrese de que el cableado del motor quede debidamente orientado y asegurado, y que los cables no queden atrapados.

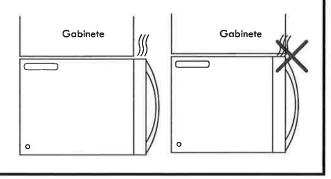


#### MONTAJE DE LA PLACA DE INSTALACIÓN EN LA PARED



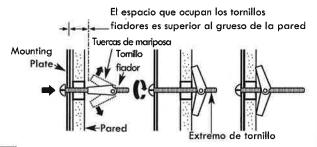
Fije la placa en la pared con los tornillos de fiador. Al menos un tornillo para madera debe ser utilizado para fijar la placa a una viga de la pared.

NOTA: Si la profundidad del gabinete incluyendo las puertas es mayor de 13" entonces la unidad debe alejarse de la pared con materiales adecuados que soporten 150 lbs para permitir una ventilación adecuada/toma de aire.



- Quite las tuercas de mariposa de los tornillos.
- Inserte los tornillos en la placa de instalación, a través de los agujeros taladrados en las partes de la pared que no son viga (los paneles) y vuelva a insertar las tuercas de mariposa hasta 3/4" (19 mm) de cada tornillo.

#### Para utilizar tornillos de fiador:



- 3 Coloque la placa de instalación contra la pared e inserte las tuercas de mariposa en los agujeros de la pared, a fin de instalar la placa.
  - NOTA: Antes de apretar los tornillos de fiador y el tornillo para madera, asegúrese de que las lengüetas de la placa de instalación toquen la parte inferior del gabinete cuando sean empujadas a ras contra la pared, y que la placa quede debidamente centrada bajo el gabinete.
- PRECAUCIÓN: Tenga cuidado de evitar que sus dedos queden atrapados entre la parte trasera de la placa de instalación y la
- 4 Apriete todos los tornillos. Tire de la placa alejándola de la pared, a fin de que resulte más fácil apretar los tornillos.

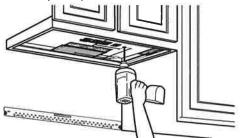
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#### Instrucciones de instalación

## C2. USO DE LA PLANTILLA PARA EL **GABINETE SUPERIOR A FIN DE** PREPARAR EL ÁREA DE DICHO GABINETE

Es necesario taladrar agujeros para los tornillos de soporte superior, así como un agujero lo suficientemente grande para que el cable eléctrico pueda pasar a través.



- Lea las instrucciones de la sección PLANTILLA PARA EL GABINETE SUPERIOR.
- Adhiera con cinta la plantilla al gabinete superior.

NOTA: Ajuste la placa superior de acuerdo a si el microondas está siendo separado de la pared debido a la profundidad del gabinete (más de 13").

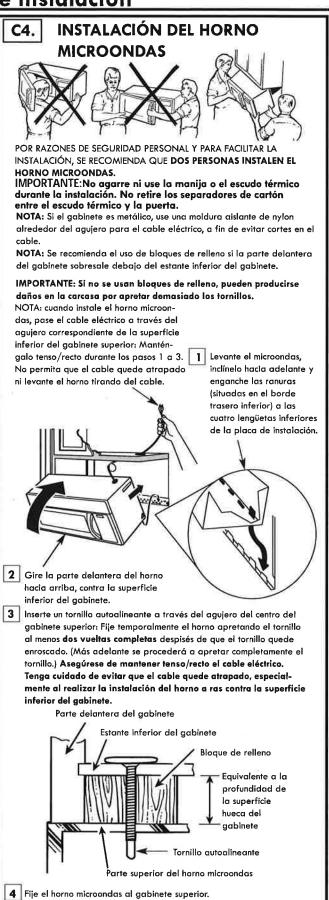
Taladre los agujeros, siguiendo las instrucciones de la sección PLANTILLA PARA EL GABINETE SUPERIOR.

PRECAUCIÓN: cuando taladre los agujeros en la superficie inferior del gabinete, use gafas protectoras.

#### C3. VERIFICACIÓN DEL CONJUNTO DEL **PLACA DEL VENTILADOR**



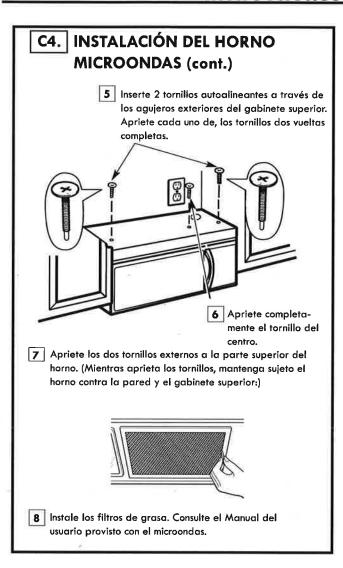
- Coloque el microondas en posición vertical, con la parte superior hacia arriba.
- Chequear siel placa del ventilador está instalado correctamente en el horno.



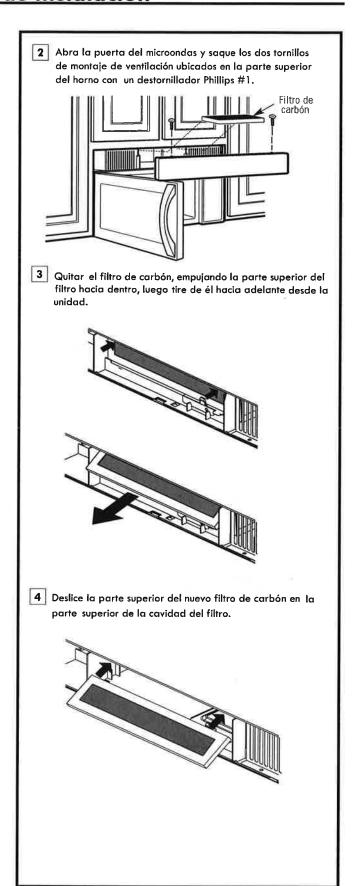
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# Instrucciones de instalación



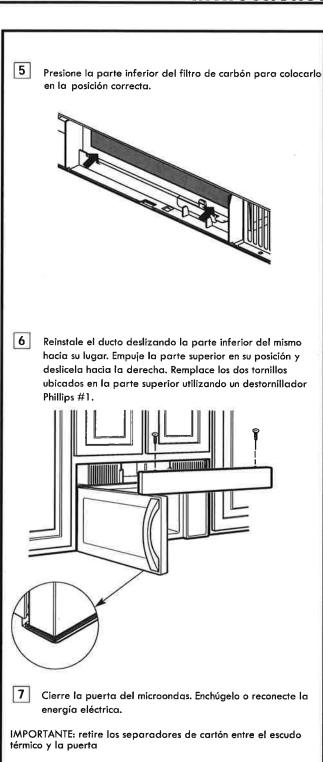




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## Instrucciones de instalación



Para el modelo con la puerta de acceso al filtro de recirculación, siga las instrucciones para remplazar o instalar un filtro PureAir®. 1 Quitar el filtro PureAir del empaque y sacudir para quitar el exceso de carbón. 2 Utilice un destornillador Phillips para desatornillar la puerta de acceso del filtro PureAir®. 3 Abra la puerta de acceso. Quite el filtro PureAir® antiguo (si lo hay) tirando hacia afuera.

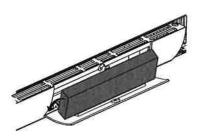
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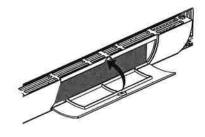
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## Instrucciones de instalación

5 Coloque el nuevo filtro PureAir® en la ranura detrás de la puerta en un ángulo hasta que esté en posición vertical y firmemente colocado en su sitio.





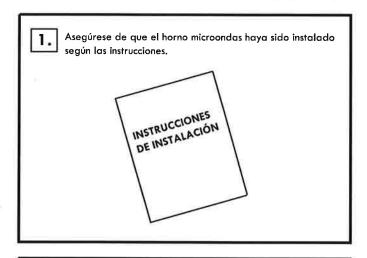
6 Asegúrese de que el filtro PureAir® esté instalado verticalmente en la ranura. Cierre la puerta de acceso y vuelva a atornillar, y el filtro PureAir® estará listo para usar.

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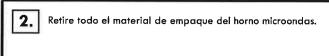
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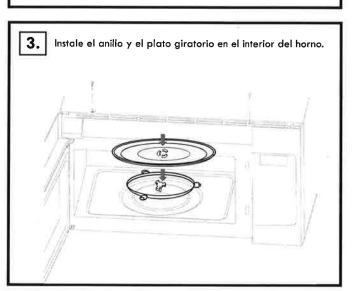
## Instrucciones de instalación

## ANTES DE USAR EL HORNO MICROONDAS

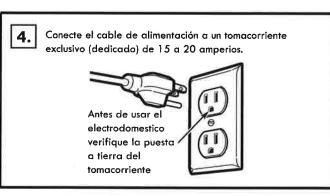














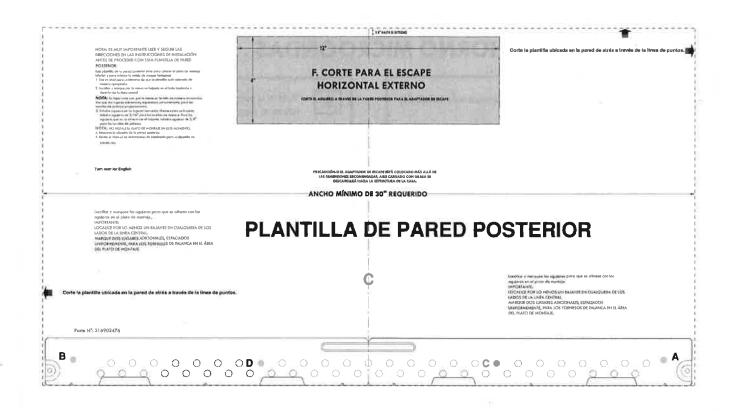


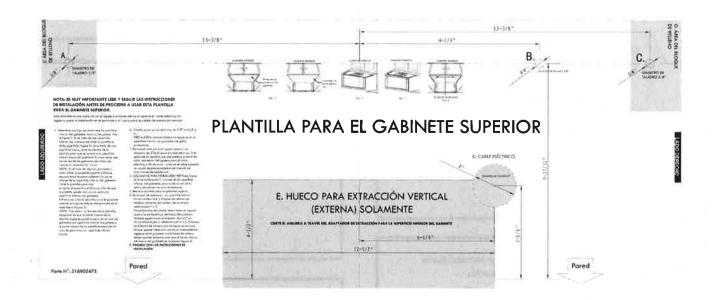
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## **EXHIBIT B**

Designation: C1055 - 03 (Reapproved 2014)

# Standard Guide for Heated System Surface Conditions that Produce Contact Burn Injuries<sup>1</sup>

This standard is issued under the fixed designation C1055; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon (\$\varepsilon\$) indicates an editorial change since the last revision or reapproval.

#### 1. Scope

- 1.1 This guide covers a process for the determination of acceptable surface operating conditions for heated systems. The human burn hazard is defined, and methods are presented for use in the design or evaluation of heated systems to prevent serious injury from contact with the exposed surfaces.
- 1.2 The maximum acceptable temperature for a particular surface is derived from an estimate of the possible or probable contact time, the surface system configuration, and the level of injury deemed acceptable for a particular situation.
- 1.3 For design purposes, the probable contact time for industrial situations has been established at 5 s. For consumer products, a longer (60-s) contact time has been proposed by Wu (1)<sup>2</sup> and others to reflect the slower reaction times for children, the elderly, or the infirm.
- 1.4 The maximum level of injury recommended here is that causing first degree burns on the *average* subject. This type of injury is reversible and causes no permanent tissue damage. For cases where more severe conditions are mandated (by space, economic, exposure probability, or other outside considerations), this guide may be used to establish a second, less desirable injury level (second degree burns), where some permanent tissue damage can be permitted. At no time, however, are conditions that produce third degree burns recommended.
- 1.5 This guide addresses the skin contact temperature determination for passive heated surfaces only. The guidelines contained herein are not applicable to chemical, electrical, or other similar hazards that provide a heat generation source at the location of contact.
- 1.6 A bibliography of human burn evaluation studies and surface hazard measurement is provided in the list of references at the end of this guide (1-16).
- <sup>1</sup>This guide is under the jurisdiction of ASTM Committee C16 on Thermal Insulation and is the direct responsibility of Subcommittee C16.30 on Thermal Measurement.
- Current edition approved Feb. 1, 2014. Published March 2014. Originally approved in 1986. Last previous edition approved in 2009 as C1055–03(2009). DOI: 10.1520/C1055-03R14
- <sup>2</sup> The boldface numbers in parentheses refer to the list of references at the end of this guide.

1.7 The values stated in SI units are to be regarded as standard. No other units of measurement are included in this standard.

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1.8 This standard does not purport to address all the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to its use.

#### 2. Referenced Documents

- 2.1 ASTM Standards:<sup>3</sup>
- C680 Practice for Estimate of the Heat Gain or Loss and the Surface Temperatures of Insulated Flat, Cylindrical, and Spherical Systems by Use of Computer Programs
- C1057 Practice for Determination of Skin Contact Temperature from Heated Surfaces Using a Mathematical Model and Thermesthesiometer

#### 3. Terminology

- 3.1 Definitions of Terms Specific to This Standard:
- 3.1.1 skin:
- 3.1.2 *epidermis*—the outermost layer of skin cells. This layer contains no vascular or nerve cells and acts to protect the skin layers. The thickness of this layer averages 0.08 mm.
- 3.1.3 *dermis*—the second layer of skin tissue. This layer contains the blood vessels and nerve endings. The thickness of this layer averages 2 mm.
- 3.1.4 *necrosis*—localized death of living cells. A clinical term that defines when permanent damage to a skin layer has occurred.
  - 3.1.5 burns:
- 3.1.6 *first degree burn*—the reaction to an exposure where the intensity or duration is insufficient to cause complete necrosis of the epidermis. The normal response to this level of exposure is dilation of the superficial blood vessels (reddening of the skin).

<sup>&</sup>lt;sup>3</sup> For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@astm.org. For Annual Book of ASTM Standards volume information, refer to the standard's Document Summary page on the ASTM website.

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- 3.1.7 second degree burn-the reaction to an exposure where the intensity and duration is sufficient to cause complete necrosis of the epidermis but no significant damage to the dermis. The normal response to this exposure is blistering of the epidermis.
- 3.1.8 third degree burn—the reaction to an exposure where significant dermal necrosis occurs. Significant dermal necrosis has been defined in the literature (3) as 75% destruction of the dermis. The normal response to this exposure is open sores that leave permanent scar tissue upon healing.
- 3.1.9 contact exposure—the process by which the surface of skin makes intimate contact with a heated surface such that no insulating layer, film, moisture, etc., interferes with the rapid transfer of available energy.
- 3.1.10 insulation system—the combination of an insulation material or jacket, or both that forms a barrier to the rapid loss of energy from a heated surface. The insulation system may involve a broad range of types and configurations of materials.
- 3.1.11 jacket—the protective barrier placed on the exposed side of an insulation to protect the insulation from deterioration or abuse. The jacket material can be made of paper, plastic, metal, canvas cloth, or combinations of the above or similar materials.
- 3.1.12 thermesthesiometer—a probe device developed by Marzetta (13) that simulates the thermal physical response of the human finger to contact with heated surfaces.

#### 4. Summary of Guide

- 4.1 This guide establishes a means by which the engineer, designer, or operator can determine the acceptable surface temperature of an existing system where skin contact may be made with a heated surface.
- 4.2 The process used in the analysis follows the outline listed below:
- 4.2.1 The user must first establish the acceptable contact exposure time and the level of acceptable injury for the particular system in question.

4.2.2 Secondly, the user determines the maximum operating surface temperature. This determination is made either by direct measurement (if possible) or by use of a calculation at design conditions using a method conforming to Practice C680.

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4.2.3 Next, utilizing the contact time (4.2.1), the maximum surface temperature (4.2.2), and the graph, Fig. 1, the user determines the potential injury level. If the operating point falls below the injury level specified (4.2.1), then no further analysis is required. (See Note 1.)

Note 1-The following equations have been developed from the original data used to generate Fig. 1 for easier use of this figure.

$$T_A = 15.005 + 0.51907 \times Ln \text{ (time} \times 1000) + 352.97/(Ln \text{ (time} \times 1000))}$$

$$T_{y} = 39.468 - 0.41352 \times Ln \text{ (time } \times 1000\text{)} + 190.60/(Ln \text{ (time } \times 1000\text{)})$$
 (2)

where:

= critical contact temperature for complete transepidermal necrosis, °C.

critical contact temperature for reversible epidermal injury, °C, elapsed contact time, s.

= natural logarithm. Ln

- 4.2.4 If the injury level exceeds that specified, further analysis of the system is required using either the thermesthesiometer (a direct method) or an additional calculation. Both methods are described in Practice C1057.
- 4.2.5 If after this additional analysis the system still exceeds the injury level criterion, then the system is unacceptable for the criterion specified and the design should be revised.

#### 5. Significance and Use

5.1 Most heated apparatus in industrial, commercial, and residential service are insulated, unless thermal insulation would interfere with their function; for example, it is inappropriate to insulate the bottom surface of a flatiron. However, surface temperatures of insulated equipment and appliances

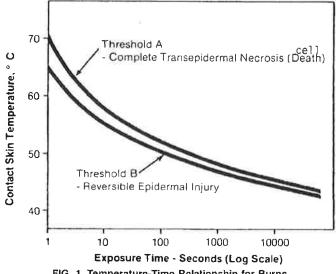


FIG. 1 Temperature-Time Relationship for Burns

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may still be high enough to cause burns from contact exposure under certain conditions.

- 5.2 This guide has been developed to standardize the determination of acceptable surface operating conditions for heated systems. Current practice for this determination is widely varied. The intent of this guide is to tie together the existing practices into a consensus standard based upon scientific understanding of the thermal physics involved. Flexibility is retained within this guide for the designer, regulator, or consumer to establish specific burn hazard criteria. Most generally, the regulated criterion will be the length of time of contact exposure.
- 5.3 It is beyond the scope of this guide to establish appropriate contact times and acceptable levels of injury for particular situations, or determine what surface temperature is "safe." Clearly, quite different criteria may be justified for cases as diverse as those involving infants and domestic appliances, and experienced adults and industrial equipment. In the first case, no more than first degree burns in 60 s might be desirable. In the second case, second degree burns in 5 s might be acceptable.

Note 2—An overview of the medical research leading to the development of this guide was presented at the ASTM Conference on Thermal Insulation, Materials and Systems on Dec. 7, 1984 (14).

- 5.4 This guide is meant to serve only as an estimation of the exposure to which an *average* individual might be subjected. Unusual conditions of exposure, physical health variations, or nonstandard ambients all serve to modify the results.
- 5.5 This guide is limited to contact exposure to heated surfaces only. It should be noted that conditions of personal exposure to periods of high ambient temperature or high radiant fluxes may cause human injury with no direct contact.
- 5.6 This guide is not intended to cover hazards for cold temperature exposure, that is, refrigeration or cryogenic applications.
- 5.7 The procedure found in this guide has been described in the literature as applicable to all heated surfaces. For extremely high-temperature metallic surfaces (>70°C), damage occurs almost instantaneously upon contact.

#### 6. Procedure

- 6.1 This procedure requires the user to make several decisions that are based upon the results obtained. Careful documentation of the rationale for each decision and intermediate result is an important part of this evaluation process.
- 6.2 The first phase in the use of this guide is to establish the acceptable limits for contact exposure time and the acceptable level of injury for the system in question. Where no available standards for these limits are prescribed, the following limits are recommended based upon a survey of the existing medical literature.
  - 6.2.1 Acceptable Contact Times:
  - 6.2.1.1 Industrial Process—5 sa
  - 6.2.1.2 Consumer Items-60 s.

- 6.2.2 Acceptable Injury Levels—The acceptable injury level is that of first degree burns as defined in 3.1.6 and is the limit represented by the bottom curve in Fig. 1.
- 6.3 The next phase in the process is to establish the maximum operating surface temperature under worst case conditions. This evaluation may be made either by direct measurement (but only at worst case conditions) or by using a calculation approximation. The steps required for determining the maximum surface temperature are as follows:
- 6.3.1 The initial step is to establish the operating system parameters. This step provides input information to the analysis and may preclude any further work concerning burn hazard. The items that need to be identified and recorded are as follows:
- 6.3.1.1 System Description—Shape, size, materials, including jacket material, thickness, and surface emittance.
- 6.3.1.2 *Operation Conditions*—Temperatures of heated system, times of year, cycle, etc.
- 6.3.1.3 Ambient Conditions—Worst case design temperature for burn hazards would be summer design dry bulb. Or, for inside conditions, the maximum expected room ambient air temperature. Include the ambient air velocity, if known.
- Note 3—Design conditions for burn hazard evaluation may be different from those used for heat loss analysis. For example, the highest ambient is used for burn hazard analysis versus the lowest for heat loss.
- 6.3.2 The second step is to determine the temperature of the system surface at the *worst* design condition by one of the following methods.
- 6.3.2.1 Insert the system dimensions, material properties, and operating conditions into an analysis technique conforming to Practice C680. This technique should be used during design or where the system surface temperatures cannot be physically measured at *worst case* conditions.
- 6.3.2.2 Direct contact thermometry (thermocouple or resistance device) or infrared, noncontact thermometry.
- Note 4—(I) Care should be used in attaching measurement devices on hot systems since burns can result; and (2) Proper installation techniques must be used with direct contact thermometry to prevent heat sinking of the surface and obtaining incorrect temperature readings.
- 6.4 In many situations, surface temperatures exceed the range of applicability of this guide and thus the evaluation is made through interpretation of the surface temperature data and the system properties. The limiting conditions below should first be examined to see if further analysis is required.
- 6.4.1 If the surface temperature is below 44°C, no short term (that is, less than 6 h) hazard exists and the remaining sections can be ignored.
- 6.4.2 If the surface temperature exceeds 70°C and the surface is metallic, it may present a hazard regardless of contact duration. Attempts should be made to lower the surface temperature below 70°C. Nonmetallic skins may be safe for limited exposure at temperatures above 70°C. In these cases, as with all cases between 44°C and 70°C, the analysis should be completed.
- 6.5 With the measurement or estimation of surface temperature for the system in question, utilize the graph (Fig. 1) and

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check if the intersection of the operating surface temperature and the selected time of contact falls below the threshold temperature.

Note 5—The threshold temperature used will depend on the limits of acceptable burn chosen in 6.2.2. If the burn level is first degree, use threshold line B in Fig. 1. If second degree burns are acceptable, use threshold line A in Fig. 1.

- 6.6 If the operating surface temperature and time are below the threshold (line B) curve, then the system meets the selected criteria.
- 6.7 If, however, the point falls above the curve, the system may meet the selected criterion only if certain combinations of insulation or jacketing, or both, are used. Analysis procedures for the jacketing/insulation effects are outlined in Practice C1057. Two methods provided in Practice C1057 are briefly described below.
- 6.7.1 The calculation technique provided in Practice C1057 uses system geometry, material properties, and temperature conditions to estimate the maximum contact temperature used in Fig. 1 when the heat capacity effects of the surface are to be considered. Once this maximum contact temperature is determined, the user returns to steps 6.5 6.7 for the refined analysis.
- 6.7.2 An alternative to calculation of the contact temperature is available for those systems that are already operating. The thermesthesiometer (13) provides an analogue measurement of the same phenomenon as the computer method models (6.7.1). Care should be used in applying the thermesthesiometer since it must be applied at *worst case* conditions if the hazard potential is to be evaluated. Practice C1057 outlines the correct procedures for use of this device for surface hazard evaluation. The output from the thermesthesiometer is the maximum contact temperature of the skin that can be related to Fig. 1 with no corrections for surface type needed.

6.8 If, after analysis using Practice C1057, the system temperature still fails to meet the selected criterion, then increasing insulation, changing jacketing, or other means must be used to lower the surface temperature. Practice C680 will be helpful in determining the levels required.

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6.9 Once a new level of jacket and insulation is determined, the analysis above should be repeated to confirm safe operating conditions.

#### 7. Report

- 7.1 Any report citing the use of this guide should include the following information:
  - 7.1.1 System description,
- 7.1.2 System operating conditions (either measured or esign),
- 7.1.3 Ambient conditions (either measured or design),
- 7.1.4 Method of surface temperature evaluation used, calculation or measurement,
- 7.1.5 Method of analysis of hazard potential, calculation, thermesthesiometer, contact time, and hazard level selected, and
  - 7.1.6 Statement of analysis of results and conclusions.

#### 8. Precision and Bias

8.1 As stated in the Scope, this procedure is valid for the average person. Individuals may be tolerant or sensitive to burns depending upon physical condition, age, ambient conditions, emotional state, etc. The literature (1, 4, 5) has shown, however, agreement on pain response and tissue damage for a panel of subjects to within approximately 10 %.

#### 9. Keywords

9.1 burns; epidermal injury; heat; injuries; skin contact temperatures; thermal insulation

#### **APPENDIX**

(Nonmandatory Information)

#### X1. RATIONALE

#### X1.1 Background—General

X1.1.1 Man has faced the potential of skin burns from touching hot surfaces since the discovery of fire in prehistoric times. He was concerned more with treatment of the injury than with the development of some means to prevent its occurrence. As civilization advanced, man developed crude insulation forms to control the extremes of heat to which he was exposed. The greatest improvement to these systems came since the industrial revolution where the use of high temperature power and process systems dictated the development of modern insulation systems, that not only conserve energy but also protect process products during manufacture. As technology expanded to include higher temperatures, more complex processes, and thus more worker exposure situations, worker

organizations and later governmental agencies demanded the increased use of insulation for personal protection.

X1.1.2 At the same time that the workplace was becoming more hazardous, the increased development of consumer products that heated, steamed, or cooked increased the potential hazards found in consumer products and forced the use of more insulation and protection for the operator. Personal protection now is required everywhere for consumer products. Examples include curling irons, ranges, irons, dryers, dishwashers, light fixtures, and furnace and heating fixtures.

X1.1.3 The obvious solution is to simply insulate the heated part and thus isolate the hazard from the user. Unfortunately, the random application of insulation without detailed analysis can sometimes disrupt the process (that is, overheating where

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some loss is desired) or be an economic handicap to the overall cost of the project. Most applications of insulation to heated process systems are made on the basis of trade-offs between the cost of the installed insulation and the cost of the energy lost. Using this criteria or the more common rule-of-thumb approach, that is, "put on about an inch like we always do," can create exposed surface temperatures that exceed even the shortest term human exposure limits. Thus, to protect both operators and casual visitors in an area, an analysis of the exposed surfaces must be undertaken to identify those having temperatures capable of causing burns.

X1.1.4 When consumer product and industrial system designers recognized the need to design for personnel safety, they established what they felt were safe operating limits for exposed surfaces. Since limited research data was available before 1950, many industries chose to establish their own standards for maximum surface temperatures based upon combinations of available research results and personal experience. This remains as the current method for the evaluation of surface hazards.

X1.1.5 In 1983, Committee C16 undertook the study of a proposal to establish a *standard* criteria for evaluating burn hazard potential. This standard was to be well documented and easily used. As an adjunct to this effort, a second standard was proposed to establish a means for evaluating existing or proposed systems for hazard level by either physical measurement or mathematical modeling.

#### X1.2 Background—Physiological Mechanism of a Burn

X1.2.1 Previous to World War II, little research has been performed in developing an understanding of the physiology of burns to the human body. With the increased destruction potential of more powerful weapons, burn injuries became a common battle problem and the military began to support research to study the relationships between burn damage and the severity of exposure. At that time, little was known about the mechanism by which hyperthermia (high temperature exposure) leads to irreversible damage. The chemical reactions occurring within the skin cells upon exposure and the relationships between exposure temperature and duration on the transfer of heat into the skin were also subjects of research.

X1.2.2 The first significant research on the subject was conducted by Henriques and Moritz at the Harvard Medical School (2, 3, 8, 9, 10, 11). The results were released for publication in 1946 through 1948. This research, performed primarily on swine (which happen to have similar skin properties to humans), with some human subjects added later,

helped define the significant parameters controlling the flow of heat into the skin. Later, the relationship between temperature and duration of exposure to the extent of damage observed was established to serve as a guide for future work. Some of the significant results of this initial work (2) are:

X1.2.2.1 The burning of human skin occurs as a complex, nonsteady heat transfer between a contacted medium, that is, a hot surface, and the surface of the skin. The rate of heating depends upon the temperature and heating capacity of the source and the heat capacity and thermal conductivity of the skin layers (see Fig. X1.1). Neglected in these studies were the flow of blood to carry heat away and the physiological changes in skin properties as the damaged zone traverses the outer skin layers.

X1.2.2.2 Factors that cause increased complexity of the problem include: (1) site variations with respect to the thickness of the different skin layers; (2) variations of initial conditions within the skin with respect to time, position, and physical condition of the subject; (3) the unknown average rate of blood flow through the skin layers and variations within the layers with respect to location and ambient temperatures (warm ambient causes increased flow near surface and cold ambient results in less flow near surface); and (4) the appearance of watery fluids in variable quantities upon exposure that result in alterations of skin density, heat capacity, thickness, and thermal conductivity.

X1.2.2.3 Analysis of the experimental results showed that it was possible to assume average conditions and to develop an approximate first order Fourier's law equation to describe the transient heat flow in the contact problem. The modeling work by Henriques neglected the influence of contact resistance and blood flow and assumed that both the skin and touched surface could be treated as semi-infinite. Succeeding experiments showed that the assumption of semi-infinite solids and neglecting blood flow were valid for the time/temperature conditions of interest. The experiments performed at Harvard used a direct contact water bath which avoided the issue of contact resistance.

X1.2.3 After their initial work was complete, Moritz and Henriques extended their work to include the effects on human skin of hyperthermia of varying duration and varying degrees of intensity. These studies (3) led to a clearer definition of the degree of burning. Several additional conclusions were forthcoming from that research and are outlined as follows:

X1.2.3.1 The pain reaction to prolonged hyperthermia exposure first occurs as a stinging sensation at between 47.5° and 48.5°C. The level of discomfort does not always correlate with

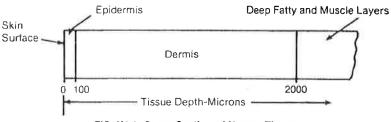


FIG. X1.1 Cross Section of Human Tissue

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the level of damage sustained or with intensity between subjects or the same subject on different days.

X1.2.3.2 The lowest temperature where epidermis (outside skin layer) damage occurs is approximately 44°C when it is sustained for approximately 6 h. It is possible to extrapolate this result to conclude that longer exposures might cause damages at temperatures below 44°C.

X1.2.3.3 As the temperatures of contact increase above 44°C, the time to damage is shortened by approximately 50% for each 1°C rise in temperature up to about 51°C.

X1.2.3.4 Testing showed that increasing the pressure of contact within an expected range was not sufficient to collapse the blood vessels and cause an increased vulnerability of the epidermis to thermal injury.

X1.2.3.5 At temperatures above 70°C, the rate of injury from a high capacity surface exceeds the body reaction time (less than 1 s to have completed epidermis cell death) such that the blood vessel location or flow has little effect on the level of burn

X1.2.3.6 The level of skin damage to the duration and intensity of surface contact can be related by the following curve (Fig. 1). Exposures below the lower curve should not produce permanent injury in normal humans. Exposures between the curves are described as second-degree burns and have intermediate levels of cell damage. Exposures at levels above the top line are defined as third-degree burns that cause deep, permanent cell damage and scarring.

X1.2.3.7 After the initial research described above, several other researchers studied the same problems to extend the knowledge of burns to more realistic situations. Most significant here are problems with contact resistance and source surfaces having non-infinite thermal inertias. Wu (1) took the analysis developed by Moritz one step further by adding the heat transfer reaction for a source of high energy. His treatment, assuming contact between two semi-infinite bodies of finite thermal inertia (as measured by the square root of thermal diffusivity) at different temperatures, showed that sources of low inertia, for example, wood, insulation, and some

plastics, cause a slower rise in skin temperature than a source of high thermal inertia, for example, steel and aluminum, at the same temperature. In short, this is explained by observing that high thermal inertia materials can make more energy available at the surface in a given time than those of lesser thermal inertia.

X1.2.3.8 Wu also pointed out that cell death (necrosis) is a result of irreversible thermal denaturation of the protein present within the cell. This denaturation is a rate process having a very high temperature coefficient that corresponds to a very high activation energy. In short, the higher the temperature of exposure, the faster damage occurs. This explanation confirms the results of Henriques and Moritz. Wu also developed the information presented in Fig. X1.2 that outlines the relationship between the pain sensation, exposed skin color, tissue temperature at 80 µm depth, and cell process.

X1.2.3.9 Stoll (4) on the other hand, looked at the relationship between pain, reaction times, and injury and found approximately  $\pm 10\%$  day-to-day variation in pain thresholds for individual human subjects. This research established a minimum time to sense the pain and react to it at any temperature to be a minimum of 0.3 s. For those situations where pain was reached beyond 0.3 s Stoll found that complete epidermal necrosis occurred at a time approximately 2.5 times the time for initial pain sensation.

X1.2.3.10 Several years after his initial work, Wu (5) proposed a third model composed of three layers (see Fig. X1.3) so that the properties of the surface layer and the substrate could be different. This model describes the identical case to that of an insulation covered by a jacket material. The equations Wu developed are a basis for establishing an extrapolation of Moritz's work to real insulated systems.

X1.2.3.11 Wu also recommended that a 1-min exposure limit be used for design purposes for persons who have slow reactions (infants, elderly, or infirmed) or who *freeze* under severe hazard conditions. The influence of contact resistance was shown to also have significant effect. Hatton et al. (6) demonstrated that the results of Stoll on pain and blistering

Sensation	Skin Color	Tiss Tempe		Process	Injury
Numbness	White	deg. C	deg. F	Protein Coagulation	Irreversible
	Mottled Red and White	68 64	140	Thermal Inactivation	Possibly Reversible
Maximum Pain Severe Pain Threshold Pain	Bright Red Light Red	60 56 52 48 44	111	of Tissue Contents	Reversible
Hot Warm	Flushed	40 36	93	Normal Metabolism	None
	1	32	90	METADORSHI	

FIG. X1.2 Thermal Sensations and Associated Effects Throughout Range of Temperatures Compatible with Tissue Life

#### Schematic of Heat Transfer Model

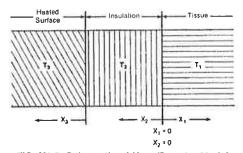


FIG. X1.3 Schematic of Heat Transfer Model

times were better correlated if a finite contact resistance was included in the model. He defined pain as the point in which the interface between the epidermis and dermis reaches a temperature of 44°C. His improved correlations were accomplished using a surface coefficient of 1000 (W/m²-K); however, depending upon skin conditions, this coefficient could range down to as low as 10 (W/m²-K).

X1.2.3.12 Finally, McChesney (7) added a final point to the understanding of burn prevention when he suggested that some factor be included in the analysis to account for the heating wave which continues to penetrate the skin for some time after the contact is removed. He did not, however, venture a guess as to what that factor should be since it would depend upon the method of cooling the contact location on the skin.

#### X1.3 Background—C16 Activity

X1.3.1 In 1983, members of Committee C16 requested that a task group be established to study the problem of burn hazard evaluation. The initial task group was established within the C16.24 Health and Safety subcommittee with the charter to establish "a guide for the determination of safe surface operating conditions for heated systems." The scope of this work included: (1) to establish a uniform definition of the human burn hazard; and (2) to establish a usable practice for design or evaluation, or both, of heated systems to prevent serious injury upon contact with exposed surfaces. After initial review of the scope and objectives, a second area was identified which was necessary to support the work of the first group. At the fall 1983 Committee C16 meeting, a task group within Subcommittee C16.30 on Thermal Measurements, was established with the objective to develop the analytical tools necessary for evaluating the contact burn potential of heated surfaces either on existing equipment or during design. These tools, when used with the guide established by the first group, are intended to provide to the user, designer, or manufacturer the procedures needed to evaluate the relative safety of a piece of hardware or system.

X1.3.2 A survey was made of available literature to establish the state of the art on the subject and to determine what standards were already in place. The information in the background section of this Appendix summarizes some of the significant work done to date in this area. Significant technical papers which relate to burn hazard evaluation and associated medical research are listed in the References (1-16).

X1.3.3 In April 1984, each task group presented the first draft of the proposed standards. The two draft standards received final society approval in February 1986. The Guide C1055, developed by Subcommittee C16.24, establishes the definitions of burn hazards and a guide for evaluating the combinations of time of exposure, surface temperature, and surface composition that make up a system with potential hazards. Practice C1057, developed by Subcommittee C16.30 has identified two tools for the evaluation of specific systems for hazardous conditions. The first tool, intended for existing systems, is a device called the thermesthesiometer. Developed by Marzetta (13, 15, 16) at National Institute of Standards and Technology, this device simulates the thermophysical reaction of the human skin to touch contact with a heated surface. Although this device is relatively accurate and easy to use, it has the drawback of requiring an existing system for test and cannot be used during the design phase. The second tool identified combines the previously established Practice C680 method for surface temperature prediction with the modeling work of Dussan (12) to predict, for a given design, the expected contact temperature for the system. This temperature is a function of surface temperature and composition of both the jacketing material and insulation substrate. The designer then refers in Guide C1055 to determine the safety of the surface.

#### X1.4 Summary

X1.4.1 Personal injury resulting from contact with heated surfaces can be prevented by proper design of insulation systems or other protective measures. The work of Subcommittee C16.24 on Health and Safety and Subcommittee C16.30 on Thermal Measurements has established a guide for what constitutes safe surface conditions and has standardized the tools by which proposed or existing systems can be examined for potential burn hazard. These standards, supported by significant research into both the physical and medical processes involved, provide the designer the tools he needs to balance the expected exposure times, operating conditions, and system geometry to obtain the safest yet most economical systems.

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# **EXHIBIT C**

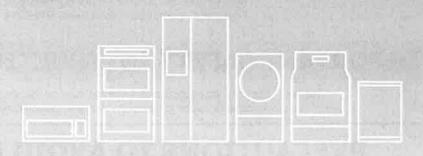
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## FRIGIDAIRE

All about the

# Jse & Care

of your Microwave Oven



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## **WELCOME & CONGRATULATIONS**

#### **Questions?**

1-800-944-9044

(United States)

1-800-265-8352

(Canada)

Please attach sales receipt here for future reference.

Congratulations on your purchase of a new microwave oven! At **Electrolux Home Products**, we are very proud of our product and are completely committed to providing you with the best service possible. Your satisfaction is our number one priority.

We know you'll enjoy your new microwave oven and **Thank You** for choosing our product. We hope you consider us for future purchases.

#### PLEASE CAREFULLY READ AND SAVE THESE INSTRUCTIONS

This Use & Care Manual provides specific operating instructions for your model. Use your microwave oven only as instructed in this manual. These instructions are not meant to cover every possible condition and situation that may occur. Common sense and caution must be practiced when installing, operating and maintaining any appliance.

Please record your model and serial numbers below for future reference.

Model Number:	
Serial Number:	
Purchase Date:	

#### NEED HELP?

### Visit the Frigidaire Web Site at: http://www.frigidaire.com

Before you call for service, there are a few things you can do to help us serve you better.

Read this manual.

It contains instructions to help you use and maintain your microwave oven properly.

**If you received a damaged Microwave Oven...** immediately contact the dealer (or builder) that sold you the Microwave Oven.

Save time and money.

Check the section titled "Service Call Check". This section helps you solve common problems that might occur. If you do need service, you can relax knowing help is only a phone call away. A list of toll-free customer service numbers is included in the back of this manual. Or call Frigidaire Customer Services at 1-800-944-9044, 24 hours a day, 7 days a week.

## **IMPORTANT SAFETY INSTRUCTIONS**

For your safety the information in this manual must be followed to minimize the risk of fire or explosion or to prevent property damage, personal injury or loss of life.

# PRECAUTIONS TO AVOID POSSIBLE EXPOSURE TO EXCESSIVE MICROWAVE ENERGY

- (a) Do not attempt to operate this oven with the door open since open-door operation can result in harmful exposure to microwave energy. It is important not to defeat or tamper with the safety interlocks.
- (b) Do not place any object between the oven front face and the door or allow soil or cleaner residue to accumulate on sealing surfaces.
- (c) Do not operate the oven if it is damaged. It is particularly important that the oven door close properly and that there is no damage to the: (1) door (bent), (2) hinges and latches (broken or loosened), (3) door seals and sealing surfaces.
- (d) The oven should not be adjusted or repaired by anyone except properly qualified service personnel.

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## **IMPORTANT SAFETY INSTRUCTIONS**

#### **Definitions**

A This is the safety alert symbol. It is used to alert you to potential personal injury hazards. Obey all safety messages that follow this symbol to avoid possible injury or death.



#### WARNING

WARNING indicates a potentially hazardous situation which, if not avoided, could result in death or serious injury.



#### CAUTION

CAUTION indicates a potentially hazardous situation which, if not avoided, may result in minor or moderate injury.

#### **READ ALL INFORMATION BEFORE USING**



#### WARNING

To reduce the risk of fire, burns, electric shock, injury to persons, or exposure to excessive microwave energy when using your appliance, follow basic **precautions**, **including the following sections**.

- Read all instructions before using the appliance.
- Read and follow the specific "PRECAUTIONS TO AVOID POSSIBLE EXPOSURE TO EXCESSIVE MICROWAVE ENERGY" on page 2.
- This appliance must be grounded. Connect only to properly grounded outlet. See "GROUNDING INSTRUCTIONS" on page 4.
- Install or locate this appliance only in accordance with the provided installation instructions.
- Some products such as whole eggs and sealed containers
   —for example, closed glass jars—are able to explode
   and should not be heated in this microwave oven.
- Use this appliance only for its intended use as described in this manual. Do not use corrosive chemicals or vapors in this appliance. This type of microwave oven is specifically designed to heat, cook or dry food. It is not designed for industrial or laboratory use.
- As with any appliance, close supervision is necessary when used by children.
- Do not operate this appliance if it has a damaged cord or plug, if it is not working properly or if it has been damaged or dropped.
- This appliance should be serviced only by qualified service personnel. Contact nearest Electrolux Authorized Servicer for examination, repair or adjustment.
- Do not cover or block any openings on the appliance.
- Do not store or use this appliance outdoors. Do not use this product near water—for example, near a kitchen sink, in a wet basement or near a swimming pool, or similar locations.
- Do not immerse cord or plug in water.
- Keep cord away from heated surfaces.
- Do not let cord hang over edge of table or counter.
- See door surface cleaning instructions on page 29.
- · Do not mount over a sink.

- Do not store anything directly on top of the appliance surface when the appliance is in operation.
- To reduce the risk of fire in the microwave oven cavity:
  - Do not overcook food. Carefully attend appliance when paper, plastic or other combustible materials are placed inside the microwave oven to facilitate cooking.
  - Remove wire twist-ties from paper or plastic bags before placing bag in microwave oven.
  - If materials inside the microwave oven ignite, keep microwave oven door closed, turn microwave oven off and disconnect the power cord or shut off power at the fuse or circuit breaker panel.
  - Do not use the cavity for storage purposes. Do not leave paper products, cooking utensils or food in the cavity when not in use.
- Liquids, such as water, coffee or tea are able to be overheated beyond the boiling point without appearing to be boiling. Visible bubbling or boiling when the container is removed from the microwave oven is not always present. THIS COULD RESULT IN VERY HOT LIQUIDS SUDDENLY BOILING OVER WHEN A SPOON OR OTHER UTENSIL IS INSERTED INTO THE LIQUID.

To reduce the risk of injury to persons:

- Do not overheat the liquid.
- Stir the liquid both before and halfway through heating it.
- Do not use straight-sided containers with narrow necks. Use a wide-mouthed container.
- After heating, allow the container to stand in the microwave oven at least for 20 seconds before removing the container.
- Use extreme care when inserting a spoon or other utensil into the container.
- Clean ventilation openings and grease filters frequently.
   Grease should not be allowed to accumulate on ventilation openings, louver or grease filters.
- Use care when cleaning the louver and the grease filters.
   Corrosive cleaning agents, such as lye-based oven cleaners, may damage the louver and the grease filters.
- When flaming food under the hood, turn the fan on.
- This appliance is suitable for use above both gas and electric cooking equipment 36" wide or less.

## SAVE THESE INSTRUCTIONS.

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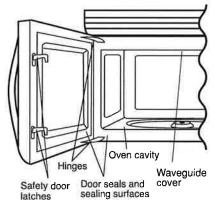
## **IMPORTANT SAFETY INSTRUCTIONS**

## UNPACKING AND EXAMINING YOUR MICROWAVE OVEN

Open the bottom of the carton, bend the carton flaps back and tilt the microwave oven over to rest on plastic foam pad. Lift carton off microwave oven and remove all packing materials, Installation Instructions, Wall Template, Top Template, Charcoal Filter, Turntable and Turntable Support. SAVE THE CARTON AS IT MAY MAKE INSTALLATION EASIER.

- Remove the feature sticker from the outside of the door, if there is one.
- DO NOT REMOVE THE WAVEGUIDE COVER, which is located on the ceiling in the microwave oven cavity. Check to see that there are Installation Instructions, Wall Template, Top Template and Charcoal Filter, which is used when recirculating is chosen. Read enclosures and SAVE the Use and Care Manual.

Check the microwave oven for any damage, such as misaligned or bent door, damaged door seals and sealing surfaces, broken or loose door hinges and latches and dents inside the cavity or on the door. If there is any damage, do not operate the microwave oven and contact your dealer or ELECTROLUX SERVICER. See Installation Instructions for more details.



## **GROUNDING INSTRUCTIONS**

This appliance must be grounded. This microwave oven is equipped with a cord having a grounding wire with a grounding plug. It must be plugged into a wall receptacle that is properly installed and grounded in accordance with the National Electrical Code and local codes and ordinances. In the event of an electrical short circuit, grounding reduces risk of electric shock by providing an escape wire for the electric current.



### WARNING

Improper use of the grounding plug can result in a risk of electric shock.

#### **Electrical Requirements**

Check Installation Instructions for proper location for the power supply.

The electrical requirements are a 120 volt 60 Hz, AC only, 15 amp. or more protected electrical supply. It is recommended that a separate circuit serving only the microwave oven be provided.

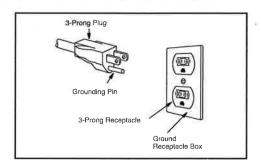
The microwave oven is equipped with a 3-prong grounding plug. It must be plugged into a wall receptacle that is properly installed and grounded. DO NOT UNDER ANY CIRCUMSTANCES CUT OR REMOVE THE GROUNDING PIN FROM THE PLUG. DO NOT USE AN EXTENSION CORD.

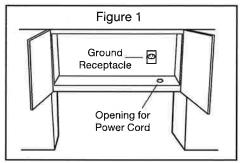
If the power supply cord is too short, have a qualified electrician or serviceman install an outlet near the appliance.

The Power Supply Cord and plug must be connected to a separate 120 Volt AC, 60 Hz, 15 Amp, or more branch circuit, single grounded receptacle. The receptacle should be located inside the cabinet directly above the Microwave Oven mounting location as shown in Figure 1.

## NOTES

- If you have any questions about the grounding or electrical instructions, consult a qualified electrician or service person.
- 2. Neither Electrolux nor the dealer can accept any liability for damage to the microwave oven or personal injury resulting from failure to observe the correct electrical connection procedures.





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## **IMPORTANT SAFETY INSTRUCTIONS**

## Federal Communications Commission Radio Frequency Interference Statement (U.S.A. Only)

This equipment generates and uses ISM frequency energy and if not installed and used properly, that is in strict accordance with the manufacturer's instructions, may cause interference to radio and television reception. It has been type tested and found to comply with limits for ISM Equipment pursuant to part 18 of FCC Rules, which are designed to provide reasonable protection against such interference in a residential installation.

However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following:

- Reorient the receiving antenna of the radio or television.
- Relocate the microwave oven with respect to the receiver.
- Move the microwave oven away from the receiver.
- Plug the microwave oven into a different outlet so that the microwave oven and the receiver are on different branch circuits.

**The manufacturer** is not responsible for any radio or television interference caused by **unauthorized modification** to this microwave oven. It is the responsibility of the user to correct such interference.

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## **IMPORTANT SAFETY INSTRUCTIONS**

#### **ABOUT YOUR MICROWAVE OVEN**

This Use and Care Manual is valuable: read it carefully and always save it for reference.

A good microwave cookbook is a valuable asset. Check it for microwave cooking principles, techniques, hints and recipes.

**NEVER** use the microwave oven without the turntable and support nor turn the turntable over so that a large dish could be placed in the microwave oven.

**ALWAYS** have food in the microwave oven when it is on to absorb the microwave energy.

When using the microwave oven at power levels below 100%, you may hear the magnetron cycling on and off. It is normal for the exterior of the microwave oven to be warm to the touch when cooking or reheating.

Condensation is a normal part of microwave cooking. Room humidity and the moisture in food will influence the amount of moisture that condenses in the microwave oven. Generally, covered foods will not cause as much condensation as uncovered ones. Ventilation openings must not be blocked.

The microwave oven is for food preparation only. It should not be used to dry clothes or newspapers.

Your microwave oven is rated 1000 watts by using the IEC Test Procedure. In using recipes or package directions, check food a minute or two before the minimum time and add time accordingly.

#### **ABOUT MICROWAVE COOKING**

• Arrange food carefully. Place thickest areas towards outside of dish.

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- Watch cooking time. Cook for the shortest amount of time indicated and add more as needed. Food severely overcooked can smoke or ignite.
- Cover foods while cooking. Check recipe or cookbook for suggestions: paper towels, wax paper, microwave plastic wrap or a lid. Covers prevent spattering and help foods to cook evenly.
- Shield with small flat pieces of aluminum foil any thin areas of meat or poultry to prevent overcooking before dense, thick areas are cooked thoroughly.
- Stir foods from outside to center of dish once or twice during cooking, if possible.
- Turn foods over once during microwaving to speed cooking of such foods as chicken and hamburgers. Large items like roasts must be turned over at least once.
- Rearrange foods such as meatballs halfway through cooking both from top to bottom and from the center of the dish to the outside.
- Add standing time. Remove food from microwave oven and stir, if possible. Cover for standing time which allows the food to finish cooking without overcooking.
- Check for doneness. Look for signs indicating that cooking temperatures have been reached.

#### Doneness signs include:

- Food steams throughout, not just at edge.
- Center bottom of dish is very hot to the touch.
- Poultry thigh joints move easily.
- Meat and poultry show no pinkness.
- Fish is opaque and flakes easily with a fork.

#### **ABOUT FOOD**

FOOD	DO	DON'T
Eggs, sausages, nuts, seeds, fruits & vegetables	<ul> <li>Puncture egg yolks before cooking to prevent "explosion".</li> <li>Pierce skins of potatoes, apples, squash, hot dogs and sausages so that steam escapes.</li> </ul>	<ul><li>Cook eggs in shells.</li><li>Reheat whole eggs.</li><li>Dry nuts or seeds in shells.</li></ul>
Popcorn	<ul> <li>Use specially bagged popcorn for microwave cooking.</li> <li>Listen while popping corn for the popping to slow to 1 or 2 seconds or use special <b>popcorn</b> pad.</li> </ul>	<ul> <li>Pop popcorn in regular brown bags or glass bowls.</li> <li>Exceed maximum time on popcorn package.</li> </ul>
Baby food	<ul> <li>Transfer baby food to small dish and heat carefully, stirring often. Check temperature before serving.</li> <li>Put nipples on bottles after heating and shake thoroughly. "Wrist" test before feeding.</li> </ul>	<ul><li>Heat disposable bottles.</li><li>Heat bottles with nipples on.</li><li>Heat baby food in original jars.</li></ul>
General	<ul> <li>Cut baked goods with filling after heating to release steam and avoid burns.</li> <li>Stir liquids briskly before and after heating to avoid "eruption".</li> <li>Use deep bowl, when cooking liquids or cereals, to prevent boilovers.</li> </ul>	<ul> <li>Heat or cook in closed glass jars or air tight containers.</li> <li>Can in the microwave as harmful bacteria may not be destroyed.</li> <li>Deep fat fry.</li> <li>Dry wood, gourds, herbs or wet papers.</li> </ul>

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## **IMPORTANT SAFETY INSTRUCTIONS**

#### **ABOUT UTENSILS AND COVERINGS**

It is not necessary to buy all new cookware. Many pieces already in your kitchen can be used successfully in your new microwave oven. Make sure the utensil does not touch the interior walls during cooking.

## Use these utensils for safe microwave cooking and reheating:

- glass ceramic (Pyroceram®), such as Corningware®.
- heat-resistant glass (Pyrex®)
- · microwave-safe plastics
- paper plates
- · microwave-safe pottery, stoneware and porcelain
- browning dish (Do not exceed recommended preheating time.
   Follow manufacturer's directions.)

## These items can be used for short time reheating of foods that have little fat or sugar in them:

· wood, straw, wicker

#### **DO NOT USE**

- · metal pans and bakeware
- · dishes with metallic trim
- · non-heat-resistant glass
- non-microwave-safe plastics (margarine tubs)
- recycled paper products
- · brown paper bags
- · food storage bags
- · metal twist-ties

Should you wish to check if a dish is safe for microwaving, place the empty dish in the microwave oven and microwave on HIGH for 30 seconds. A dish which becomes very hot should not be used.

#### The following coverings are ideal:

- Paper towels are good for covering foods for reheating and absorbing fat while cooking bacon.
- Wax paper can be used for cooking and reheating.
- Plastic wrap that is specially marked for microwave use can be used for cooking and reheating. DO NOT allow plastic wrap to touch food. Vent so steam can escape.
- Lids that are microwave-safe are a good choice because heat is kept near the food to hasten cooking.
- Microwave oven cooking bags are good for large meats or foods that need tenderizing. DO NOT use metal twist ties. Remember to slit bag so steam can escape.

## How to use aluminum foil in your microwave oven:

- Small flat pieces of aluminum foil placed smoothly on the food can be used to shield areas that are either defrosting or cooking too quickly.
- Foil should not come closer than one inch to any surface of the microwave oven.

Should you have questions about utensils or coverings, check a good microwave cookbook or follow recipe suggestions.

ACCESSORIES There are many microwave accessories available for purchase. Evaluate carefully before you purchase so that they meet your needs. A microwave-safe thermometer will assist you in determining correct doneness and assure you that foods have been cooked to safe temperatures. Electrolux is not responsible for any damage to the microwave oven when accessories are used.

#### ABOUT CHILDREN AND THE MICROWAVE

Children below the age of 7 should use the microwave oven with a supervising person very near to them. Between the ages of 7 and 12, the supervising person should be in the same room.

As with any appliance, close supervision by an adult is necessary when used by children.

At no time should anyone be allowed to lean or swing on the microwave oven door.

Children should be taught all safety precautions: use potholders, remove coverings carefully, pay special attention to packages that crisp food because they may be extra hot.

Don't assume that because a child has mastered one cooking skill he/she can cook everything.

Children need to learn that the microwave oven is not a toy. See page 20 for Child Lock feature.

#### **ABOUT SAFETY**

 Check foods to see that they are cooked to the United States Department of Agriculture's recommended temperatures.

TEMP	FOOD
145°F (63°C)	- For beef, lamb or veal cut into steaks, chops or roasts, fish
160°F (71°C)	<ul> <li>For fresh pork, ground meat, seafood, egg dishes, frozen prepared food and beef, lamb or veal cut into steaks, chops or roasts</li> </ul>
165°F (74°C)	<ul> <li>For leftover, ready-to-reheat refrigerated, deli and carry out "fresh" food, whole chicken or turkey, chicken or turkey breasts and ground poultry used in chicken or turkey burgers</li> </ul>

## 4

#### NOTE

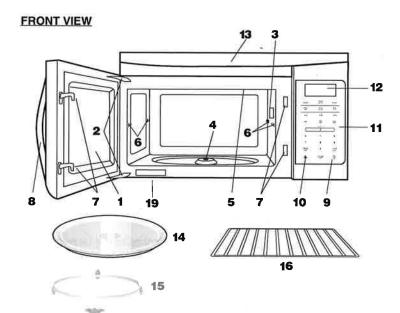
Do not cook whole, stuffed poultry. Cook stuffing separately to 165°F.

To test for doneness, insert a meat thermometer in a thick or dense area away from fat or bone. NEVER leave the thermometer in the food during cooking, unless it is approved for microwave oven use.

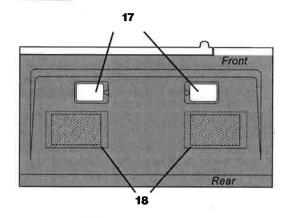
- ALWAYS use potholders to prevent burns when handling utensils that are in contact with hot food. Enough heat from the food can transfer through utensils to cause skin burns.
- Avoid steam burns by directing steam away from the face and hands. Slowly lift the farthest edge of a dish's covering and carefully open popcorn and oven cooking bags away from the face.
- Stay near the microwave oven while it's in use and check cooking progress frequently so that there is no chance of overcooking food.
- NEVER use the cavity for storing cookbooks or other items.
- Select, store and handle food carefully to preserve its high quality and minimize the spread of foodborne bacteria.
- Keep waveguide cover clean. Food residue can cause arcing and/or fires.
- Use care when removing items from the microwave oven so that the utensil, your clothes or accessories do not touch the safety door latches.
- Keep aluminum foil used for shielding at least 1 inch away from walls, ceiling and door.

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## **PART NAMES**



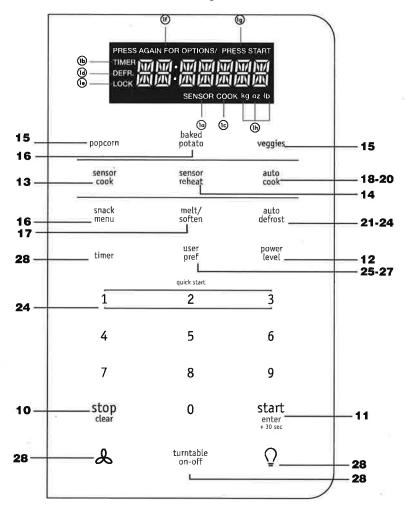
#### **BOTTOM VIEW**



- 1 Microwave oven door with see-through window
- 2 Door hinges
- 3 Waveguide cover: DO NOT REMOVE.
- 4 Turntable motor shaft
- 5 Microwave oven light It will light when microwave oven is operating or door is open.
- 6 Rack holders
- 7 Safety door latches
  The microwave oven will not operate unless the door is securely closed.
- 8 Handle
- 9 Light hi/lo/off pad Press the **light hi/lo/off** pad once for high, twice for low and three times to turn off the light.
- 10 Vent hi/lo/off pad Press the vent hi/lo/off pad once for high speed, twice for low speed and three times to turn off the fun.
- 11 Auto-Touch control panel
- 12 Time display: Digital display, 99 minutes, 99 seconds
- 13 Ventilation openings
- 14 Removable turntable
  The turntable will rotate clockwise or counterclockwise. Only remove for cleaning.
- 15 Removable turntable support
  First, carefully place the turntable support in the
  motor shaft in the center of the microwave oven
  floor. Place the support ring on the microwave oven
  floor. Then, place the turntable on the turntable
  support securely.
- 16 Rack for 2-level cooking/ reheating
- 17 Light cover
- 18 Grease filters
- 19 Menu label

## **CONTROL PANEL**

The 7-digit Interactive Display spells out operating steps and shows cooking hints.



Number next to the control panel illustration

indicates pages on which there are feature descriptions and usage information.

- **1. Display:** The display includes a clock and indicators that show the time of day, cooking time settings, cook powers, sensor, quantities, weights and cooking functions selected.
  - **1a. SENSOR:** Icon displayed when using sensor cook.
  - **1b. TIMER:** Icon displayed when timer is being set or running.
  - **1c. COOK:** Icon displayed when starting microwave cooking.
  - 1d. DEFR: Icon displayed when defrosting food
  - **1e. LOCK:** Icon displayed in control lock.
  - 1f. PRESS AGAIN FOR OPTIONS: Icon displayed when additional options are available.
  - **1g. PRESS START:** Icon displayed when a valid function can be started.
  - **1h. kg**, **oz**, **lb:** Icon displayed when choosing the weight.

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## **BEFORE OPERATING**

- Before operating your new oven make sure you read and understand this Use and Care Guide completely.
- The clock can be disabled when the microwave is first plugged in and the STOP key is selected.

To re-enable the clock follow clock instructions.

#### To Set the Clock

Suppose you want to enter the correct time of day 10:59

Touch:	Display Shows:
1. user pref	12:00 ENTER TIME
2. 1 0 5	(D:59
start 3. enter + 30 sec	10:59



## NOTE

1. If you begin to enter in an incorrect time (e.g. 2:89) the 8 is an invalid digit and cannot be entered. Enter the correct time.

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2. If you touch STOP while setting the clock, the display will show the last time of day set or a blank display if no time of day has been set.

#### STOP clear

Press the STOP clear to:

- 1. Erase if you make a mistake during programming.
- 2. Cancel timer and the signal after cooking.
- 3. Stop the oven temporarily during cooking.
- 4. Return the time of day to the display.
- 5. Cancel a program during cooking, press twice.

## **MANUAL COOKING**

#### **Time Cooking**

Your Over the Range Microwave Oven can be programmed for 99 minutes 99 seconds (99:99). Always enter the seconds after the minutes, even if they are both zeros.

Suppose you want to cook for five minutes, 30 seconds at 100% power,

Touch:	Display Shows:
1.530	5:30 PRESS.START
2. start enter + 30 sec	コーコロ counting down

#### **Interrupting Cooking**

You can stop the oven during a cycle by opening the door. The oven stops heating and the fan turns off, but the light stays on.

To restart cooking, close the door and Touch. start

enter + 30 sec

If you do not want to continue cooking, open the door and touch  $\ensuremath{\text{Stop}}$ 

ctear

#### **Using One Touch Start**

This is a time saving pad that will automatically start cooking 2 seconds after selected. Numeric key 1, 2, or 3 can be touched for a 1 minute, 2 minute or 3 minute automatic start cooking feature.

Touch:	Display Shows:
1.2	2:00

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## **MANUAL COOKING**

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#### Using Add 30 Sec.

This is a time-saving pad. It is a simplified feature that lets you quickly set and start microwave cooking at 100% power.

Suppose you want to cook for one minute.

Touch:	Display Shows:
1. start enter + 30 sec	:30 <sub>°°°°</sub>
2. start enter + 30 sec	:□□ cook  Time counting down



Each time you touch ADD 30 SEC, it will add 30 seconds up to 99 minutes 99 seconds.

#### **Setting Timed Cooking With Power Level**

This feature lets you program a specific cook time and power. For best results, there are 10 power level settings in addition to HIGH (100%) power.

 Suppose you want to cook for five minutes, 30 seconds at 80% power.

Touch:	Display Shows:
1.530	S:30
2. Power x 3 Level	PAESS START
start 3. enter + 30 sec	S:∃☐ Time counting down

## NOTE

If you do not select a power level, the oven will automatically cook at HIGH (100%) power.

#### **Setting Two-Stage Cooking**

For best results, some recipes call for different power levels during a cook cycle. You can program your oven for two power level stages during the cooking cycle.

• Suppose you want to set a 2-stage cook cycle. The first stage is a 3 minute cook time at 80% cook power then a 7 minute cook time at 50% cook power.

Touch:	Display Shows:
1. 3 0 0 To set a 3 minute cook time for first stage.	PRESS START
2. Power x 3	PL-80
3. 7 0 0 To set a 7 minute cook power for the second stag	PRIESS START
Power 4. Level × 6	PRESS START

## NOTE

You can program a "0" power second stage for standing time inside the oven.



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## MANUAL COOKING

#### To Set Power Level

There are eleven preset power levels.

Using lower power levels increases the cooking time which is recommended for foods such as cheese, milk and long slow cooking of meats. Consult cookbook or recipes for specific recommendations.

PRESS POWER LEVEL PAD NUMBER OF TIMES FOR DESIRED POWER	APPROXIMATE PERCENTAGE OF POWER	COMMON WORDS FOR POWER LEVELS
POWER LEVEL x 1	100%	High
POWER LEVEL x 2	90%	
POWER LEVEL x 3	80%	
POWER LEVEL x 4	70%	Medium High
POWER LEVEL x 5	60%	
POWER LEVEL x 6	50%	Medium
POWER LEVEL x 7	40%	
POWER LEVEL x 8	30%	Med Low/Defrost
POWER LEVEL x 9	20%	
POWER LEVEL x 10	10%	Low
POWER LEVEL x 11	0%	- 1

#### **Using the Rack**

The rack allows several foods to be cooked or reheated at one time. However, for the best cooking and reheating, use Turntable ON function and cook with SENSOR COOKING or AUTO COOKING without the rack. When the rack is used, set time and power level manually. Allow plenty of space around and between the dishes. Pay close attention to the cooking and reheating progress. Reposition the foods and reverse them from the rack to turntable and/or stir them at least once during any cooking or reheating time. After cooking or reheating, stir if possible. Using a lower power level will assist in better cooking and reheating uniformity.

#### Avoid:

- Storing the rack in the microwave oven when not in use.
- Popping popcorn with the rack in the microwave oven.
- Using any browning dish on the rack.
- Using SENSOR COOKING and AUTO COOKING with the rack.
- Cooking directly on the rack—use microwave-safe cookware.



#### NOTE

Turntable on/off function can be used in Manual Operation. See page 28.

#### **Manual Defrost**

If the food that you wish to defrost is not listed on the Defrost chart or is above or below the limits in the Amount column on the Defrost chart (see page 22-23), you need to defrost manually.

You can defrost any frozen food, either raw or previously cooked, by using power level for 30%.

For either raw or previously cooked frozen food the rule of thumb is approximately 4 minutes per pound. For example, defrost 4 minutes for 1 pound of frozen spaghetti sauce.

Always stop the oven periodically to remove or separate the portions that are defrosted. If food is not defrosted at the end of the estimated defrosting time, program the oven in 1 minute increments on power level 30% until totally defrosted.

When using plastic containers from the freezer, defrost only long enough to remove from the plastic in order to place in a microwave-safe dish.

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## SENSOR COOKING

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Sensor cooking has an electronic controlled sensor that detects the vapor (moisture and humidity) emitted from the food as it heats. The sensor adjusts the cooking times and power level for various foods and quantities automatically.

#### **Using Sensor Settings:**

- 1. Be sure the exterior of the cooking container and the interior of the oven are dry. Wipe off any moisture with a dry cloth or paper towel.
- The oven works with foods at normal storage temperature. For example, popcorn would be at room temperature.
- More or less food than the quantity listed in the chart should be cooked following the guidelines in any microwave cookbook.
- 4. During the first part of SENSOR COOKING, food name will appear in the display. Do not open the oven door or press the STOP clear pad during this part of the cycle. The measurement of vapor will be interrupted. When the sensor detects the vapor emitted from the food, remainder of cooking time will appear. Door may be opened when remaining cooking time appears in the display. At this time, you may stir or season food, as desired.
- 5. If the sensor does not detect vapor properly when popping popcorn, the oven will turn off, and the correct time of day will be displayed. If the sensor does not detect vapor properly when cooking other foods, AN ERROR CODE will be displayed, and the oven will turn off.
- 6. Check food for temperature after cooking. If additional time is needed, continue to cook manually.

#### **Covering Foods:**

Some foods cook better when covered.

- 1. Casserole lid.
- Plastic wrap: Use plastic wrap recommended for microwave cooking. Cover dish loosely; allow approximately 1/2 inch to remain uncovered to allow steam to escape. Plastic wrap should not touch food.
- 3. Wax paper: Cover dish completely; fold excess wrap under dish to secure. If dish is wider than paper, overlap two pieces at least one inch to cover.

Be careful when removing any covering to allow steam to escape away from you.

## NOTES for SENSOR COOKING

- The final cooking result will vary according to the food condition (e.g. initial temperature, shape, quality). Check food for temperature after cooking. If additional time is needed, continue to cook manually.
- 2. Stay near the oven while it's in use and check cooking progress frequently so that there is no chance of overcooking food.
- 3. When SENSOR COOKING are selected Turntable On is automatically set for optimum cooking.

#### **Sensor Cook**

You can cook foods by pressing the **sensor cook** pad multiple times. You don't need to calculate cooking time or power level.

Suppose you want to cook frozen breakfast.

Touch:	Display Shows:
1. sensor cook	PRESS AGAIN FOR OPTIONAL PRESS START SENSOR
2. sensor cook	PRIESS AGAIN FOR OPTIONAL PRIESS START SENSOR
3. sensor cook	PRESS AGAIN FOR OPTIONAL PRESS START SERVICE SERVICE
4. sensor cook	FROZEN BREAKERST
5. enter	FROZEN BREAKFAST

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## **SENSOR COOKING**

#### **Sensor Cook chart**

-,, -			
FOOD	AMOUNT	PROCEDURE  Place bacon strips on a microwave bacon rack for best results. (Use dinner plate lined with paper towels if rack is not available).	
1.Bacon	1-3 slices		
2. Frozen Dinner	10 oz./ 20 oz.	Place in a appropriately sized microwave container.  Cover with plastic wrap . After cooking, stir and allow to stand for 3 minutes.	
3. Rice	1-2 cups Use medium or long grain rice. Cook instant rice according to directions on the package.	Place rice and twice as much liquid (water, chicken or vegetable stock) in a 2 quart microwave dish.  Cover with plastic wrap and vent. After cooking, allow to stand for 10 minutes. Stir for fluffier rice.	
4. Frozen Breakfast	8/12 oz.	Place in a appropriately sized microwave container.  Cover with plastic wrap . After cooking, stir and allow to stand for 3 minutes.	

#### **Sensor Reheat**

Suppose you want to reheat rolls with sensor reheat.

Touch:	Display Shows:
1. sensor reheat	PRESS AGAIN FOR OPTIONS/ PRESS START
2. sensor reheat	PRESS AGAIN FOR OPTIONS/ PRESS START
3. sensor reheat	PHISS AGAIN FOR OPTIONS/ PRESS STAIRT  SENSOR
4. sensor reheat	PRESS AGAIN FOR OPTIONS/ PRESS STAFF
5. start enter + 30 sec	POLLS sensor cook

#### **Sensor Reheat chart**

FOOD	AMOUNT	PROCEDURE
Dinner Plate	1-2 Plates	Place on a low plate. Cover with vented plastic wrap. Let stand 3 minutes after cooking.
Soup/Sauce	1-2 Cups	Place in shallow microwavable casserole. Cover with vented plastic wrap. After cooking, stir and let stand 3 minutes.
Casserole/	1-4 Servings	Place in a microwavable bowl or casserole. Cover with
Lasagna	_	vented plastic wrap. After cooking, stir and let stand 3 minutes.
Roll/Muffin	1-3 Pieces	Place on paper towel. Do not cover.

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## **ONE TOUCH COOK**

**Popcorn** 

The Popcorn quick touch pad lets you pop 3.3, 3.0, 1.75 ounce bags of commercially packaged microwave popcorn. Pop only one package at a time. If you are using a microwave popcorn popper, follow manufacturer's instructions.

Suppose you want to pop a 3.3 oz. popcorn.

Touch:	Display Shows:
1. popcorn	PRESS AGAIN FOR OPTIONS/ PRESS START
2. start enter + 30 sec	PDPCDP1

Amount	Press popcorn pad
3.30 oz.	once
3.00 oz.	2 times
1.75 oz.	3 times

## NOTES

1.Remove the metal shelf from microwave oven when cooking popcorn. Do not use regular paper bags. Do not re-pop unpopped kernals. Do not pop popcorn in glass cookware.

#### **Veggies**

There are 2 options (Frozen Vegetables, Fresh Vegetables) under the Veggies.

Suppose you want to cook two cups of frozen veggies.

Touch:	Display Shows:
1. veggies	PRESS ACIAIN FOR OPTIONS/ PRESS START
2. veggies	PRESS AGAIN FOR OPTIONS/ PRESS START
3. start enter so sec	F ROZEN VE GG:ES

Time counting down

#### Vegetables chart

FOOD	AMOUNT	PROCEDURE
(Initial temperature)		
1. Frozen Vegetables (-18℃)	4 - 24 oz 0.2 - 0.7 kg	Add no water. Cover with lid or plastic wrap. Press the <b>vegetables</b> pad two times for Frozen Vegetables. After cooking, stir and let stand, covered, for 3 minutes.
2. Fresh Vegetables 4 - 24 oz (5 °C) 0.2 - 0.7 kg  Broccoli  Brussels sprouts Cabbage Cauliflower (flowerets)  Cauliflower (Abels)  4 - 24 oz 0.2 - 0.7 kg  Wash and place in casserole. Add no water if just been washed. Cover with lid for tender values plastic wrap for tender-crisp vegetables. Presupation pad one time for fresh Vegetables. After coordinates and place in casserole. Add no water if just been washed. Cover with lid for tender values plastic wrap for tender-crisp vegetables. Presupation pad one time for fresh Vegetables. After coordinates and place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole. Add no water if just been washed. Cover with lid for tender values place in casserole.	Wash and place in casserole. Add no water if vegetables have just been washed. Cover with lid for tender vegetables. Use plastic wrap for tender-crisp vegetables. Press the <b>vegetables</b> pad one time for fresh Vegetables. After cooking, stir, if possible. Let stand, covered, for 2 to 5 minutes.	
Carrots, sliced Corn on cob Green beans Winter squash - diced - halves		Place in casserole. Add 1-4 tbsp. water. Cover with lid for tender vegetables. Use plastic wrap cover for tender-crisp vegetables. Press the <b>vegetables</b> pad and number 1 for fresh Vegetables . After cooking stir, if possible. Let stand, covered, for 2 to 5 minutes.

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## **ONE TOUCH COOK**

#### **Snack Menu**

Snack Menu is for cooking/heating foods that take a short amount of time!

• Suppose you want to reheat 2 cups of beverage.





start

Time counting down

**Snack Menu chart** 

FOOD	AMOUNT	PROCEDURE
1. Beverage	1 - 3 cups	To reheat beverages. Stir liquid briskly before and after heating to avoid "eruption".
2. Frozen MW Pizza	(6 - 8 oz) (170 - 225 g)	Use for frozen microwave pizza. Remove from package and unwrap. Follow package directions for use of package and/or silver crisping disk.
3. Hot Dogs	1 - 6 pieces	Place hot dog in bun. Wrap each with paper towel or napkin.
4. Meal in a Cup	2.39 oz	This setting is ideal for individual portions of canned food packed in a small microwaveable container, usually 6 to 8 ounces. Remove inner metal lid and replace outer microwaveable lid. After cooking, stir food and allow to stand 1 or 2 minutes.
5. Frozen Kid's Meal	8.8 oz	Use this pad for frozen, convenience foods. It will give satisfactory results for most brands. You may wish to try several and choose your favorite. Remove package from outer wrapping and follow package directions for covering. After cooking, let stand, covered for 1 to 3 minutes.

#### **Baked Potato**

Suppose you want to cook 1 to 4 baked Potatoes.

Touch:	Display Shows:
baked potato	PPESS STAAT SENSOR
start 2. enter	POTRTO



#### **NOTES**

1. Cooking times are based on an average 8 ounce potato.

#### **Baked Potato chart**

FOOD	AMOUNT	PROCEDURE
Baked Potato*	1 - 4 pieces	Pierce with fork in several places. Place on paper towel on turntable. After cooking, remove from oven and let stand for 5 minutes.

<sup>\*</sup> It is not necessary to enter amount or number.

+ 30 sec

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## **ONE TOUCH COOK**

#### **Setting Melt/Soften**

The oven uses low power to melt and soften items. See the following table.

• Suppose you want to melt 2 sticks of Butter.

Touch:	Display Shows:		
1. melt/ soften	PRESS AGAIN FOR OPTIONS/ PRESS START		
2. start enter + 30 sec	ENTER 1-2 STK		
3. ②	2 STICK		
start 4. enter + 30 sec	MELT BUTTER Time counting down		

#### MELT **TABLE**

CATEGORY	AMOUNT	DIRECTION
BUTTER	1 or 2 sticks	Unwrap and place in microwavable container. No need to cover butter. Stir at the end of cooking to complete melting.
CHOCOLATE	2, 4 or 8 oz.	Chocolate chips or squares of baking chocolate may be used. Unwrap squares and place in microwavable container. Stir at the end of cycle to complete melting.
ICE CREAM	Pint, 1.5 Quart.	Place container in oven. Ice cream will be soft enough to make scooping easier.
CREAM CHEESE	3 or 8 oz.	Unwrap and place in microwavable container. Cream cheese will be at room temperature and ready for use in recipe.

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## **AUTO COOKING**

#### **Auto Cook**

Auto cook is divided into 2 parts-Quick Meals (Scrambled Eggs, Hot Cereal, Frozen Pizza, Fudge Brownies) and Dinner Recipes (Garlic Shrimp, Asiago Red Potatoes, Roasted Vegetable Medley, Lemon and Shrimp Risotto, White Chicken Chilli).

Key	Food	Amount
Snacks x1	Scrambled Eggs	1 - 6 Eggs
Snacks x2	Hot Cereal	1 - 3 Servings
Snacks x3	Frozen Pizza	12 oz
Snacks x4	Fudge Brownies	
Snacks x5	Garlic Shrimp	Per Recipe
Snacks x6	Stuffed Mushrooms	Per Recipe
Snacks x7	Asiago Red Potatoes	Per Recipe
Snacks x8	Roasted Vegetable Medley	Per Recipe
Snacks x9	Lemon and Shrimp Risotto	Per Recipe
Snacks x10	White Chicken Chili	Per Recipe

#### <Quick Meals>

• Suppose you want to cook Hot Cereal for 1 serving .

Touch:	Display Shows:		
1. auto cook	PRESS AGAIN FOR OPTIONS/ PRESS STAIT		
2. auto cook	PRISS AGAIN FOR OPTIONS/ PRISS START		
start 3. enter + 30 sec	I-3 SERUNG		
4. ③	POLESS STUIT		
5. start enter	HOT CEREAL Time counting down		
L NOTES	THURSDAY YEIGHTAN		

When AUTO COOKING are selected, Turntable On is automatically set for optimum cooking.

#### **Quick Meals chart**

FOOD	AMOUNT	PROCEDURE	
1. Scrambled Eggs	1 - 6 eggs	Whisk together egg and milk (use 1/2 tablespoon milk for each egg) in a microwave safe bowl that has been coated with cooking spray. Select "Scrambled Eggs" under the Auto Cook menu and the desired number of eggs to be cooked. Stir half way through cooking time.	
2. Hot Cereal	1- 3 servings	Use individual packets or bulk cereal in your favorite variety: oatmeal, oat bran, cream of wheat, farina or wheatena. Follow package directions for the correct amount of water or milk. To prevent boilovers, it is very important to choose a large container because microwave cooking of cereal causes high boiling. Select "Hot Cereal" under the Auto Cook menu and the desired number servings.	
3. Frozen Pizza	12 oz	Use for frozen microwave pizza. Remove from package and unwrap. Follow package directions for use of package and/or silver crisping disk.	
4. Fudge Brownies	18-19 oz	Prepare brownie mix according to package directions. Spoon batter into an $8\times8$ inch microwave safe glass dish that has been coated with cooking spray. Select "Fudge Brownies" under the Auto Cook menu.	

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## **AUTO COOKING**

#### <Dinner Recipes>

Suppose you want to cook Garlic shrimp.

Touch:	Display Shows:
auto cook	SERRI 18LEI EESS
2. auto cook	PRESS ADMIN FOR OPTIONS/ PRESS STANT
3. auto cook	PRESS ADAM FOR OPTIONS PRESS START
4. auto cook	FLITTE BROWN 11ES
5. auto cook	PRESS AGAIN FOR OPTIONS/ PRESS START
6. start enter + 30 sec	□RRL:□ SHR:MP

#### < Dinner Recipes

#### Garlic Shrimp

- 1/4 cup butter
- 6 cloves garlic, minced
- 2 tablespoons chopped fresh chives
- 2 tablespoons lemon juice
- 1 tablespoon chili pepper paste

Salt to taste

1 pound raw, peeled and deveined large shrimp

Place butter in a 2 quart microwave safe casserole dish with lid. Microwave on High power for 1 minute or until butter is melted. Stir in garlic, and microwave for an additional 1 minute. Stir in chives, lemon juice, chili pepper paste, and salt. Add shrimp, tossing to coat evenly. Cover, and microwave on High power for 5 minutes, or until shrimp is opaque, stirring after 3 minutes. Serve over hot cooked rice if desired.

#### Stuffed Mushrooms

- 1 pound whole baby bella mushrooms
- 2 tablespoons butter, melted
- 1 bunch green onion, chopped
- 1/4 cup shredded Parmesan cheese
- 2 tablespoons bread crumbs
- 1 teaspoon lemon juice
- 1/4 teaspoon garlic pepper

Crushed red pepper to taste

Remove stems from mushrooms and set aside.

Arrange mushroom caps on microwave safe plate.

Finely chop reserved mushroom stems. Combine butter, chopped mushroom stems, and green onion in a 1 quart microwave safe dish; microwave on High power for 2 minutes. Add remaining ingredients and mix well. Spoon stuffing into mushroom caps.

Microwave on High power for 4 to 5 minutes, or until mushrooms are tender.

#### **Asiago Red Potatoes**

- 1 1/4 pound red potatoes, peeled and thinly sliced
- 2 tablespoons all purpose flour
- 1/2 teaspoon salt
- 1 1/4 cups milk
- 1 tablespoon butter, melted
- 5 ounces shredded Asiago cheese

Combine potatoes, flour, and salt in a zip top plastic bag; seal bag and shake to coat potatoes.

Transfer potatoes to a lightly greased 2 quart microwave safe casserole dish. Add milk and butter, stirring well. Cover and microwave on High power for 12 minutes or until potatoes are tender; sprinkle with cheese and microwave on High power for an additional 5 minutes or until cheese melts.

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## **AUTO COOKING**

#### **Roasted Vegetables Medley**

1 cup baby carrots

1 cup sliced yellow squash

1 cup sliced zucchini

1/2 cup sliced red bell pepper

1/2 cup thinly sliced onion

1 tablespoon butter

Garlic and herb seasoning to taste

Combine carrots, squash, zucchini, bell pepper, and onion in a 2 quart microwave safe casserole dish. Dot with butter and sprinkle with seasoning. Cover, and microwave on High power for 5 minutes or to desired degree of doneness.

#### **Lemon and Shrimp Risotto**

- 2 teaspoons butter
- 2 teaspoons olive oil
- 2 tablespoons finely chopped shallot
- 4 cups chicken broth
- 1/4 cup fresh squeezed lemon juice
- 2 cups risotto
- 1 pound medium shrimp, peeled and deveined
- 1 cup frozen peas, thawed
- 2 teaspoons grated lemon zest
- 1/4 teaspoon black pepper
- 34 teaspoon salt

Combine butter, olive oil, and shallot in a 1 quart microwave safe dish. Microwave on High for 1 minute or until shallot is tender. Set aside.

Combine chicken broth and lemon juice in a 2 quart microwave safe measuring cup or casserole dish. Cover with lid or vented plastic wrap. Microwave on High power for 10 minutes. Stir in reserved shallot mixture and risotto. Cover and continue to microwave on High power for 17 minutes. Stir in shrimp, peas, grated lemon zest, pepper, and salt. Cover and microwave on 50% power for 3 minutes or until shrimp is opaque.

#### White Chicken Chilli

1 pound boneless, skinless chicken breast, cubed

1/2 cup chopped onion

3 garlic cloves, minced

1 (15 ounce) can white beans, drained

1 (4 ounce) can chopped green chili pepper

1 cup chicken broth

1 1/2 teaspoon chili powder

34 teaspoon cumin

1/2 teaspoon salt

½ teaspoon black pepper

1/2 cup chopped fresh cilantro

2 tablespoons fresh lime juice

Combine chicken, onion, and garlic in a 2.5 quart microwave safe dish. Cover, and microwave on High for 6 minutes, or until chicken is fully cooked and onion is tender, stirring after 3 minutes.

Add white beans, chili pepper, chicken broth, chili powder, cumin, salt and pepper, stirring well. Cover and microwave on High for 10 minutes, stirring after 5 minutes.

Stir in cilantro and lime juice before serving.

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## **AUTO DEFROST**

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#### **Using Auto Defrost**

The auto defrost feature provides you with the best defrosting method for frozen foods. The cooking guide will show you which defrost sequence is recommended for the food you are defrosting.

For added convenience, the Auto Defrost includes a built-in beep mechanism that reminds you to check, turn over, separate, or rearrange the food in order to get the best defrost results. Three different defrosting levels are provided:

- 1. MEAT
- 2. POULTRY
- 3. FISH

Available weight is 0.1-6.0 lbs

Suppose you want to defrost 1.2 lbs of fish.

Touch:	Display Shows:
auto defrost	PRESS STAFF
auto <sup>2.</sup> defrost	PRESS AGAIN FOR OPTIQUES PRESS STANT
auto <sup>3.</sup> defrost start	FRESS AGAIN FOR OPTIONAL PRESS STAFF
4. enter + 30 sec	ENTER WEIGHT
5. 1 and 2	PRESS START
To enter weight	
start 6. enter + 30 sec	DEFR FISH
6. enter	Time counting down

## NOTES

The oven will beep during the DEFROST cycle. At this time, open the door and turn, separate, or rearrange the food. Remove any portions that have thawed. Return frozen portions to the oven and touch START to resume the defrost cycle.

**Operating Tips** 

- For best results, remove fish, shell fish, meat and poultry from its original closed paper or plastic package (wrapper). Otherwise, the wrap will hold steam and juice close to the foods, which can cause the outer surface of the foods to cook.
- For best results, roll your ground meat into a ball before freezing. During the DEFROST cycle, the microwave will signal when it is time to turn the meat over. Scrape off any excess frost from the meat and continue defrosting.
- Place foods in a shallow container or on a microwave roasting rack to catch drippings.

This table shows food type selections and the weights you can set for each type. For best results, loosen or remove covering on food.

KEY		WEIGHTS YOU
PRESS	Category	CAN SET (tenths of a pound)
Defrost	Meat	0.1 to 6.0
Defrost	Poultry	0.1 to 6.0
Defrost	Fish	0.1 to 6.0

#### Weight conversion table

You are probably used to measuring food in pounds and ounces that are fractions of a pound (for example, 4 ounces equals 1/4 pound). However, in order to enter food weight in Auto Defrost, you must specify pounds and tenths of a pound.

If the weight on the food package is in fractions of a pound, you can use the following table to convert the weight to decimals.

Equivalent Weight		
OUNCES	DECIMAL WEIGHT	
1.6	.10	
3.2	.20	
4.0	.25 One-Quarter Pound	
4.8	.30	
6.4	.40	
8.0	.50 One-Half Pound	
9.6	.60	
11.2	.70	
12.0	.75 Three-Quarters Pound	
12.8	.80	
14.4	.90	
16.0	1.0 One Pound	

## NOTES

If between two decimal weights, choose the lower weight for the best defrosting results.

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## **AUTO DEFROST**

#### **Auto Defrost Table**

NOTE: Meat of irregular shape and large, fatty cuts of meat should have the narrow or fatty areas shielded with foil at the beginning of the defrost sequence.

#### **Meat Settings**

FOOD	SETTING	AT BEEP	SPECIAL INSTRUCTIONS
BEEF			
Ground Beef, Bulk	MEAT	Remove thawed portions with fork. Turn over. Return remainder to oven.	Do not defrost less than 1/4 lb. Freeze in ball shape.
Ground Beef, Patties	MEAT	Separate and rearrange.	Do not defrost less than 2 oz. patties. Depress center when freezing.
Round Steak	MEAT	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish.
Tenderloin Steak	MEAT	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish.
Stew Beef	MEAT	Remove thawed portions with fork. Separate remainder.	Place in a microwave safe dish.
Pot Roast, Chuck Roast	MEAT	Return remainder to oven.	Place in a microwave safe dish.
Rib Roast	MEAT	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish.
Rolled Rump Roast	MEAT	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish.
LAMB			
Cubes for Stew	MEAT	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish.
Chops (1 inch thick)	MEAT	Remove thawed portions with fork. Return remainder to oven.	Place in a microwave safe dish.
PORK			
(1/2 inch thick)	MEAT	Separate and rearrange.	Place in a microwave safe dish.
Hot Dogs	MEAT	Separate and rearrange.	Place in a microwave safe dish.
Spareribs Country-style Ribs	MEAT	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish.
Sausage, Links	MEAT	Separate and rearrange.	Place in a microwave safe dish.
Sausage, Bulk	MEAT	Remove thawed portions with fork. Turn over. Return remainder to oven.	Place in a microwave safe dish.
Loin Roast, Boneless	MEAT	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish.

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# **AUTO COOKING**

### **Auto Defrost Table (Continued)**

### **Poultry Settings**

FOOD	SETTING	AT BEEP	SPECIAL INSTRUCTIONS
CHICKEN Whole (up to 6 lbs)	POULTRY	Turn over breast side dow@over warm areas with aluminum foil.	Place chicken breast-side up in a microwave safe dish. Finish defrosting by immersing in cold water. Remove giblets when chicken is partially defrosted.
Cut-up		Separate pieces and rearrange.  Turn over. Cover warm areas with	Place in a microwave safe dish,  Finish defrosting by immersing in cold
		aluminum foil.	water.
CORNISH HENS Whole	POULTRY	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish. Finish defrosting by immersing in cold water.
TURKEY Breast (up to 6 lbs)	POULTRY	Turn over. Cover warm areas with aluminum foil.	Place in a microwave safe dish. Finish defrosting by immersing in cold water.

### **Fish Settings**

FOOD	SETTING	AT BEEP	SPECIAL INSTRUCTIONS
<b>FISH</b> Fillets	FISH	Turn over. Separate fillets when partially thawed, if possible.	Place in a microwave safe dish. Carefully separate fillets under cold water.
Steaks	FISH	Separate and rearrange.	Place in a microwave safe dish. Run cold water over to finish defrosting.
Whole	FISH	Turn over	Place in a microwave safe dish. Cover head and tail with foil; do not let foil touch sides of microwave. Finish defrosting by immersing in cold water.
SHELLFISH		FI .	
Crab meat	FISH	Break apart. Turn over.	Place in a microwave safe dish.
Lobster tails	FISH	Turn over and rearrange.	Place in a microwave safe dish.
Shrimp	FISH	Separate and rearrange.	Place in a microwave safe dish.
Scallops	FISH	Separate and rearrange.	Place in a microwave safe dish.

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# **AUTO DEFROST**

### **Defrosting Tips**

- •When using Auto Defrost, the weight to be entered is the •The length of defrosting time varies according to how net weight in pounds and tenths of pounds (the weight of the food minus the container).
- Beforeg Startin, make sure to remove any and all metal twist-ties that often come with frozen food bags, and replace them with strings or elastic bands.
- · Open containers, such as cartons, before placing in the oven.
- Always slit or pierce plastic pouches or packaging.
- If food is foil wrappe, remove foil and place food in a suitable container.
- Slit the skin of skinned food, such as sausage.
- Bend plastic pouches of food to ensure even defrosting.
- · Always underestimate defrosting time. If defrosted food is still icy in the center, return it to the microwave oven for more defrosting.

- solidly the food is frozen.
- The shape of the package affects how quickly food will defrost. Shallow packages will defrost more quickly than a deep block.
- As food begins to defrost, separate the pieces. Separated pieces defrost more easily.
- Use small pieces of aluminum foil to shiele parts of food such as chicken wings, leg tips, fish tails, or areas that start to get warm. Make sure the foil does not touch the sides, top, or bottom of the oven. The foil can damage the oven lining.
- For better results, let food stand after defrosting.
- Turn over food during defrosting or standing time. Break apart and remove food as required.

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# **CONVENIENT FEATURES**

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### **User Pref**

The microwave oven has settings that allow you to customize the operation for your convience. Below is the table showing the various settings. Touch the User Pref key multiple times to scroll to the desired setting function.

Key press	Option
User Pref x1	Clock
User Pref x2	Control Lock
User Pref x3	Volume Off/Low/Med/High
User Pref x4	Weight lb/kg
User Pref x5	Demo
User Pref x6	Language

### (1). Setting Clock

The clock can be disabled when the microwave is first plugged in and the STOP key is selected. To re-enable the clock follow clock instructions.

• Suppose you want to set the clock for 10:59.

То	uch:	Display Shows:
1.	user pref	12:00 ENTER TIME
2.	1005	9) ID:59
3.	start enter + 30 sec	IO:59

## NOTE

- 1. If you begin to enter in an incorrect time (e.g. 2:89) the 8 is an invalid digit and cannot be entered. Enter the correct time.
- If you touch STOP while setting the clock, the display will show the last time of day set or a blank display if no time of day has been set.

### (2).Setting Control Lock On/Off

To turn ON Control Lock.

Display Shows:
12:00 ENTER TIME
FIRST AGAIN FOR OPPICABLY PILES START
Time of day if time of day was set LOCK

To turn OFF the Control Lock, touch User Pref then touch Start

enter + 30 sec NYSCEF DOC. NG ase 5:17-cv-01397-TJM-DEP Document 1-1 Filed 12/30/17 Regert of viser: 11/20/2017

# **CONVENIENT FEATURES**

### (4).Turning Sound On/Off/Low/Med/High

Audible signals are available to guide you when setting and using your oven.

- A programming tone will sound each time you touch a pad.
- •Three tones signal the end of a Kitchen Timer count down.
- •Three tones signal the end of a cooking cycle.
- Suppose you want to turn audible signal off.

Touch:		Display Shows:
1.	user pref	PRESS AGAN FOR OPTIONS/
2.	user pref	PRESS AGAIN FOR OPTIONS/PRESS START
3.	user pref	PRIESS AGAIN FOR OPTIONS! PRIESS START  PRIESS AGAIN FOR OPTIONS! PRIESS START
4.	start enter + 30 sec	° OFF

# NOTE

When START is pressed and the previous setting was ON then it will be set to OFF. If you want to turn the audible signal back ON you will have to again press User Pref three times and then START.

When the cooking cycle is completed END will be displayed and the audible signal will sound if the sound is turned on.

### (5). Setting Weight Ib/Kg

 Suppose you want to toggle weight between pounds & kilograms.

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Touch:	Display Shows:
1. user pref	2:00 ENTER TIME
2. user pref	PRIESS AGAIN FOR OPTIONS/PRESS START
3. user pref	PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START
4. user 4. pref	PRIESS AGAIN FOR OPTIONS/ PRESS START
5. start enter	К [] ***

# NOTE

If the display shows kg, pressing the START button will reset the oven controls to lbs. To return to kg, you will have to again press User Pref Four times and then START.

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# **CONVENIENT FEATURES**

### (6).Setting Demo Mode On/Of

Suppose you want to enter Demo mode.

То	uch:	Display Shows:
1.	user pref	PRESS AGAIN FOR OPTIONS/
2.	user pref	PRESS AGAIN FOR OPTIONS/ PRESS START
3.	user pref	PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START
4.	user pref	PRESS AGAIN FOR OPTIONS/ PRESS STATT
5.	user pref	PHESE AGAIN FOR OPTIONS/ PHESS START
6.	start enter + 30 sec	

# NOTE

When START is pressed and the previous setting was OFF then it will be set to ON. If you want to turn the demo mode back OFF you will have to again press User Pref five times and then START.

### **SETTING LANGUAGE ENGLISH/FRANCAIS**

Suppose you want to set the language.

Touch:	Display Shows:
1. user pref	PRESS AGUNY FOR OPTIONS
2. user pref	FRESS AGAIN FOR OPTIONS/PRESS START
3. user pref	PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START  PRESS AGAIN FOR OPTIONS/ PRESS START
4. user pref	PRESS AGAIN FOR OPTIONS/ PRESS START
5. user pref	PRESS AGAIN FOR OPTIONS PRESS START
6. user pref	LANGUAGE ENGL:5H
start 7. enter + 30 sec	FRANCA:5

# NOTE

When START is pressed and the previous setting was English it will be set to French. If you want switch back to English you will have to again press User Pref six times and then press START.

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# **CONVENIENT FEATURES**

### 2. Setting Kitchen Timer

Your microwave oven can be used as a kitchen timer. You can set up to 99 minutes, 99 seconds The kitchen timer can be used while the microwave oven is running.

• Suppose you want to set for three minutes.

Touch:	Display Shows:
1. timer	TIMER ENTER TIME
2. 300	TIMER PRESS STANT
start 3. enter + 30 sec	Timer starts counting down

### NOTE

Timer count down does not stop even if the door is open. To cancel the timer, press the "STOP" key once.

### 3.Using Vent Fan

The pad controls the 2-speed vent fan. If the vent fan is OFF the first touch of the Vent pad will turn the fan on HIGH, second touch LOW and third touch OFF.

 Suppose you want to set the vent fan speed to LOW from the OFF position.

Touch:	Display Shows:
1.	H:5H
2.	L OH

Turn off fan when desired

# NOTE

If the temperature from the range or cooktop below the oven gets too hot, the vent fan will automatically turn on to protect the oven. It may stay on up to an hour to cool the oven. When this occurs, the Vent pad will not turn the fan off.

### 4. Using Cooktop Light

The pad controls the cooktop light. If the light is OFF the first touch of the light pad will turn the light ON (high), second touch Nite (low) and third touch OFF.

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 Suppose you want to set the light for HIGH from the OFF position.

Touch:	Display Shows:
1,	

### 5. Setting Turntable On/Off

Press **Turntable On-Off** to turn the turntable on or off.

For best cooking results, leave the turntable on. It can be turned off for large dishes.

Touch:	Display Shows:		
1. turntable on-off	[i d		
2. turntable on-off	OFF		

### NOTE

Sometimes the turntable can become hot to the touch during and after cooking. Do not run the oven empty without food in it.

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# **CLEANING AND CARE**

Disconnect the power cord before cleaning or leave the door open to deactivate the oven during cleaning.

### **EXTERIOR**

The outside surface is precoated steel and plastic. Clean the outside with mild soap and water; rinse and dry with a soft cloth. Do not use any type of household or abrasive cleaner.

### **DOOR**

Wipe the window on both sides with a soft cloth to remove any spills or spatters. Metal parts will be easier to maintain if wiped frequently with a soft cloth. Avoid the use of spray and other harsh cleaners as they may stain, streak or dull the door surface.

# EASY CARE™ STAINLESS STEEL (SOME MODELS)

Your microwave oven finish may be made with Easy Care<sup>™</sup> Stainless Steel (some models). Clean the stainless with warm soapy water using a clean sponge or cloth. Rinse with clean water and dry with a soft clean cloth. DO NOT use ANY store bought cleaners like Stainless Steel cleaners or any other types of cleaners containing any abrasive, chlorides, chlorines or ammonia. It is recommended to use mild dish soap and water or a 50/50 solution of water and vinegar.

#### **TOUCH CONTROL PANEL**

Care should be taken in cleaning the touch control panel. If the control panel becomes soiled, open the microwave oven door before cleaning. Wipe the panel with a cloth dampened slightly with water only. Dry with a soft cloth. Do not scrub or use any sort of chemical cleaners. Close door and touch **STOP/CLEAR** 

#### INTERIOR

Cleaning is easy because little heat is generated to the interior surfaces. To clean the interior surfaces, wipe with a soft cloth and warm water. DO NOT USE ABRASIVE OR HARSH CLEANERS OR SCOURING PADS. For heavier soil, use baking soda or a mild soap; rinse thoroughly with hot water. The round wire rack and shelf can be cleaned with hot soapy water, rinsed and dried.

### **WAVEGUIDE COVER**

The waveguide cover is located on the side in the microwave oven cavity. It is made from mica so requires special care. Keep the waveguide cover clean to assure good microwave oven performance. Carefully wipe with a damp cloth any food spatters from the surface of the cover immediately after they occur. Built-up splashes may

overheat and cause smoke or possibly catch fire. DO NOT REMOVE THE WAVEGUIDE COVER.

### **ODOR REMOVAL**

Occasionally, a cooking odor may remain in the microwave oven. To remove, combine 1 cup water, grated peel and juice of 1 lemon and several whole cloves in a 2-cup glass measuring cup. Boil for several minutes using 100% power. Allow to set in microwave oven until cool. Wipe interior with a soft cloth.

### TURNTABLE/TURNTABLE SUPPORT

The turntable and turntable support can be removed for easy cleaning. Wash them in mild, sudsy water; for stubborn stains use a mild cleanser and non-abrasive scouring sponge. They are also dishwasher-proof. Use upper wirerack of dishwasher. The turntable motor shaft is not sealed, so excess water or spills should be wiped up immediately.

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## **CLEANING AND CARE**

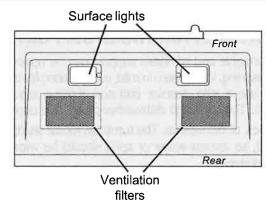
Disconnect the power cord before cleaning or leave the door open to deactivate the oven during cleaning.

### Cleaning the exhaust filters

The oven ventilation exhaust filters should be removed and cleaned often; generally at least once every month.

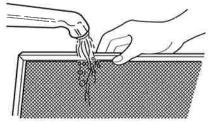
### **A** CAUTION

To avoid risk of personal injury or property damage, do not operate oven hood without filters properly in place.





1. To remove the exhaust ventilation filters, slide the filter to the rear. Then pull filter downward and push to the other side. The filter will drop out. Repeat for the 2nd filter.



 Soak the ventilation filters in hot water using a mild detergent. Rinse well and shake to dry or wash in a dishwasher. Do not use ammonia. The aluminum on the filter will corrode and darken.



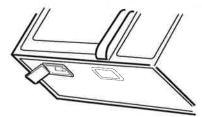
3. To reinstall the exhaust ventilation filter, slide it into the side slot, then push up and toward oven to lock. Reinstall the 2nd filter using the same procedure.

### Surface light replacement

### **A** CAUTION

To avoid risk of personal injury or property damage, wear gloves when replacing the light bulbs.

- Unplug the microwave oven or turn off power at the main circuit breaker.
- 2. Remove the bulb cover mounting screws at both light positions under the microwave.



- 3. Replace bulb with 30 watt appliance bulb.
- 4. Re-install bulb cover and mounting screw.
- 5. Plug the microwave back into the power supply or turn the power back on at the main circuit breaker.

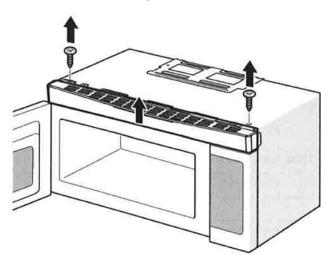
# **CLEANING AND CARE**

Disconnect the power cord before cleaning or leave the door open to deactivate the oven during cleaning.

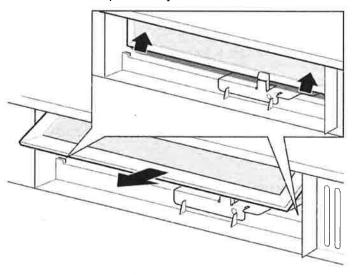
### Charcoal filter replacement

Charcoal Filter installed in your microwave oven, is used for nonvented, recirculated installation. The filter should be changed every 6 to 12 months depending on use.

- 1. Disconnect power to the microwave oven at the circuit breaker panel or by unplugging.
- 2. Remove the vent grill mounting screws.
- 3. Pull the vent grill away from the unit.



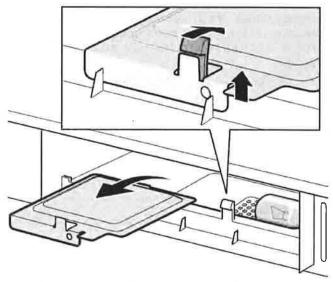
4. Remove the charcoal filter by pushing it inwards. then turn and pull it away from the unit.



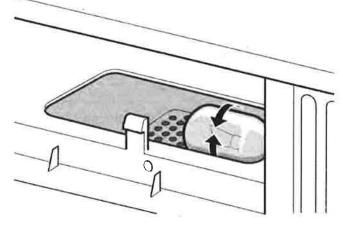
### Oven light replacement

Remove the vent grill per instructions 1-4 above and charcoal filter, if used.

1. Open light cover located behind filter mounting by carefully pulling up on the front edge.



2. Remove old light bulb and replace only with equivalent 30 watt bulb available from parts distributor. Bulbs are also available at most hardware stores or lighting centers.



Note: DO NOT USE BULB LARGER THAN 30 WATTS.

3. Replace the microwave oven light cover by carefully pushing into place. Replace the charcoal filter. Push the vent grill back into place (engaging both the bottom and top tabs) and replace the vent grill mouting screws.

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## SERVICE CALL CHECK

Please check the following before calling for service:

Place one cup of water in a glass measuring cup in the microwave oven and close the door securely. Operate the microwave oven for one minute at HIGH 100%.

Α	Does the microwave oven light come on?	YES	NO
В	Does the cooling fan work? (Put your hand on the louver above the Control Panel.)	YES	NO
C	Does the turntable rotate? (It is normal for the turntable to turn in either direction.)	YES	NO
D	Is the water in the microwave oven warm?	YES	NO

If "NO" is the answer to any of the above questions, please check electrical outlet, fuse and/or circuit breaker. If they are functioning properly, CONTACT YOUR NEAREST ELECTROLUX AUTHORIZED SERVICER.

A microwave oven should never be serviced by a "do-it-yourself" repair person.

# NOTES

If time appearing in the display is counting down very rapidly, check Demonstration Mode on page 27 and cancel.

# **SPECIFICATIONS**

INDEX NO. 006569/2017

AC Line Voltage:	Single phase 120V, 60Hz, AC only 1600W 14.2 amps. (for FGMV173QF, FGMV173QB/W/Q/M)		
AC Power Required:			
Output Power*:	1000 W		
Frequency:	2450 MHz (Class B/Group2)**		
Outside Dimensions:	297/8"(W) x 1613/32"(H) x 151/32"(D)		
Cavity Dimensions:	2015/16"(W) x 97/16"(H) x 14 13/32"(D)		
Microwave oven Capacity***:	1.7 Cu.Ft.		
Cooking Uniformity:	Turntable		
Weight:	Approx. (net) 61.7 lb, (gross) 28.0 lb		
Work/Night Light:	2 bulbs 30w each (incandescent light bulbs)		
Oven Light:	1 bulb 30w (incandescent light bulbs)		

- \* The International Electrotechnical Commission's standardized method for measuring output wattage. This test method is widely recognized.
- \*\* This is the classification of ISM (Industrial, Scientific and Medical) equipment described in the International Standard CISPR11.
- \*\*\* Internal capacity is calculated by measuring maximum width, depth and height. Actual capacity for holding food is less. In compliance with standards set by:

FCC

- Federal Communications Commission Authorized.

**DHHS** 

- Complies with Department of Health and Human Services (DHHS) rule, CFR, Title 21, Chapter I, Subchapter J.

NHW

- Department of National Health and Welfare of Canada.



- This symbol on the nameplate means the product is listed by Underwriters Laboratories, Inc.



This symbol on the nameplate means the product is listed by Underwriters Laboratories, Inc. for use in USA or Canada.

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## MAJOR APPLIANCE WARRANTY INFORMATION

Your appliance is covered by a one year limited warranty. For one year from your original date of purchase, Electrolux will pay all costs for repairing or replacing any parts of this appliance that prove to be defective in materials or workmanship when such appliance is installed, used and maintained in accordance with the provided instructions.

### **Exclusions This warranty does not cover the following:**

- 1. Products with original serial numbers that have been removed, altered or cannot be readily determined.
- 2. Product that has been transferred from its original owner to another party or removed outside the USA or Canada.
- 3. Rust on the interior or exterior of the unit.
- 4. Products purchased "as-is" are not covered by this warranty.
- 5. Food loss due to any refrigerator or freezer failures.
- Products used in a commercial setting.
- 7. Service calls which do not involve malfunction or defects in materials or workmanship, or for appliances not in ordinary household use or used other than in accordance with the provided instructions.
- 8. Service calls to correct the installation of your appliance or to instruct you how to use your appliance.
- Expenses for making the appliance accessible for servicing, such as removal of trim, cupboards, shelves, etc., which are not a part of the appliance when it is shipped from the factory.
- 10. Service calls to repair or replace appliance light bulbs, air filters, water filters, other consumables, or knobs, handles, or other cosmetic parts.
- 11. Surcharges including, but not limited to, any after hour, weekend, or holiday service calls, tolls, ferry trip charges, or mileage expense for service calls to remote areas, including the state of Alaska.
- 12. Damages to the finish of appliance or home incurred during installation, including but not limited to floors, cabinets, walls, etc.
- 13. Damages caused by: services performed by unauthorized service companies; use of parts other than genuine Electrolux parts or parts obtained from persons other than authorized service companies; or external causes such as abuse, misuse, inadequate power supply, accidents, fires, or acts of God.

#### **DISCLAIMER OF IMPLIED WARRANTIES; LIMITATION OF REMEDIES**

CUSTOMER'S SOLE AND EXCLUSIVE REMEDY UNDER THIS LIMITED WARRANTY SHALL BE PRODUCT REPAIR OR REPLACEMENT AS PROVIDED HEREIN. CLAIMS BASED ON IMPLIED WARRANTIES, INCLUDING WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, ARE LIMITED TO ONE YEAR OR THE SHORTEST PERIOD ALLOWED BY LAW, BUT NOT LESS THAN ONE YEAR. ELECTROLUX SHALL NOT BE LIABLE FOR CONSEQUENTIAL OR INCIDENTAL DAMAGES SUCH AS PROPERTY DAMAGE AND INCIDENTAL EXPENSES RESULTING FROM ANY BREACH OF THIS WRITTEN LIMITED WARRANTY OR ANY IMPLIED WARRANTY. SOME STATES AND PROVINCES DO NOT ALLOW THE EXCLUSION OR LIMITATION OF INCIDENTAL OR CONSEQUENTIAL DAMAGES, OR LIMITATIONS ON THE DURATION OF IMPLIED WARRANTIES, SO THESE LIMITATIONS OR EXCLUSIONS MAY NOT APPLY TO YOU. THIS WRITTEN WARRANTY GIVES YOU SPECIFIC LEGAL RIGHTS. YOU MAY ALSO HAVE OTHER RIGHTS THAT VARY FROM STATE TO STATE.

# If You Need Service

Keep your receipt, delivery slip, or some other appropriate payment record to establish the warranty period should service be required. If service is performed, it is in your best interest to obtain and keep all receipts. Service under this warranty must be obtained by contacting Electrolux at the addresses or phone numbers below.

This warranty only applies in the USA and Canada. In the USA, your appliance is warranted by Electrolux Major Appliances North America, a division of Electrolux Home Products, Inc. In Canada, your appliance is warranted by Electrolux Canada Corp. Electrolux authorizes no person to change or add to any obligations under this warranty. Obligations for service and parts under this warranty must be performed by Electrolux or an authorized service company. Product features or specifications as described or illustrated are subject to change without notice.

**USA**1.800.944.9044
Electrolux Home Products, Inc., 10200 David Taylor Drive

**Electrolux** 

Canada 1.800.265.8352

INDEX NO. 006569/2017

Electrolux Canada Corp. 5855 Terry Fox Way Mississauga, Ontario, Canada

L5V 3E4

Charlotte, NC 28262

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# FRIGIDAIRE GALLERY.

# Microwaves FGMV175Q F/W/B



### Signature Features



Sensor Cooking Microwave automatically adjusts power levels and cooking times to cook a variety of items, effortlessly.



Over 30 Options Versatile settings include: Chicken nuggets and snacks.



Effortless™ Reheat Reheat almost anything with the touch of a button.



SpaceWise Rack Our SpaceWise® Rack creates more room so you can cook multiple dishes at once

### 30" Over-The-Range

INDEX NO. 006569/2017

#### **Product Dimensions**

Height 16-13/32" Width 29-7/8" Depth 15-1/32"

### More Easy-To-Use Features

#### **One-Touch Options**

Our microwaves feature easy-to-use one-touch buttons so you can cook baked potatoes, popcorn or even add 30 seconds with the touch of a button.

Smudge-Proof™ Stainless Steel¹ Resists fingerprints and smudges so it's easy to clean.

#### Available in:



Select models only.

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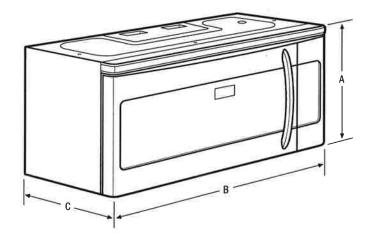
Microwaves

FGMV175Q F/W/B 30" Over-The-Range

### FRIGIDAIRE GALLERY.

Features	CONTRACTOR OF THE PARTY OF THE
Control/Timing System	Express-Select*
Exterior Door Finish	Smudge-Proof™ Stainless Steel (F), Color-Coord.(W/B)
Handle Design	Stainless Steel (F), Color-Coord (W/B)
Microwave Capacity (Cu.Ft.)	1.7
Convection	
Watts (IEC-705 Test Procedure)	1,000
Interior Light	Yes
Interior Color	White
Turntable Diameter	13"
Turntable On/Off	Yes
Control Lock	Yes
Clock	Yes
Touch Pad Buttons	28
Power Levels	High (1-9)
Accessory Metal Rack	Yes (1)
Microwave Control Options	ASSESSED NO. 15
Popcorn Button	Yes
Chicken Nugget Button	Yes
Baked Potato Button	Yes
Sensor Reheat Button	Yes
Snack Button	Yes
Beverage	
Melt & Soften Options	4
Auto Reheat Options	4
Snack Menu Options	5
Auto Cook Options	10
Auto Defrost Options	3
Multi-Stage Cooking Option	Yes
Keep Warm	
Add-30-Seconds	Yes
Sensor Cooking Options	5
Vegetable Cook Sensor	Yes
Delay Start	
User Preferences	Yes
Ventilation System	
Ducted/Ductless Installation Option	Yes
Exhaust Fan (CFM)	2-Speed
	180/300
Cooktop Light	2
Auto-Start Heat Sensor	Yes
Dishwasher-Safe Vent Filter (Ductless Installation)	Yes
Power Ratings	
Frequency (MHz)	2,450
Watts @ 120 Volts	1,000
Amps @ 120 Volts	14.2
Optional Accessories	
36" Stainless Steel Filler Panel Kit	PN# MWFILKTSS
36" Black Filler Panel Kit	PN# MWFILKTBK
36" White Filler Panel Kit	PN# MWFILKTWH
Specifications	
Oven Interior (HxWxD)	9-7/16" x 20-5/16" x 14-13/32'
Power Supply Connection Location	Right Top Rear
Voltage Rating	120V/60Hz/15A
Connected Load (kW Rating) @ 120 Volts	1.6
Minimum Circuit Required (Amps)	15

For use on adequately wired 120V, dedicated circuit having 2-wire service with a separate ground wire. Appliance must be grounded for safe operation.



NOTE: For planning purposes only. Always consult local and national electric codes.

Refer to Product Installation Guide for detailed installation instructions on the web at frigidaire.com.



<b>Product Dimensions</b>	
A-Height	16-13/32"
B-Width	29-7/8"
C-Depth	15-1/32"

Cutout Dimensions		
Height (Min. from floor to top of unit)	66"	
Width (Min.)	30"	
Depth (Min.)	12"	
Depth (Max.)	13"	

Accessories information available on the web at frigidaire.com

#### FRIGIDAIRE

USA • 10200 David Taylor Drive • Charlotte, NC 28262 • 1-800-FRIGIDAIRE • frigidaire.com CANADA • 5855 Terry Fox Way • Mississauga, ON LSV 3E4 • 1-800-265-8352 • frigidaire.ca FILED: ONONDAGA COUNTY CLERK 11/20/2017 11:46 AM

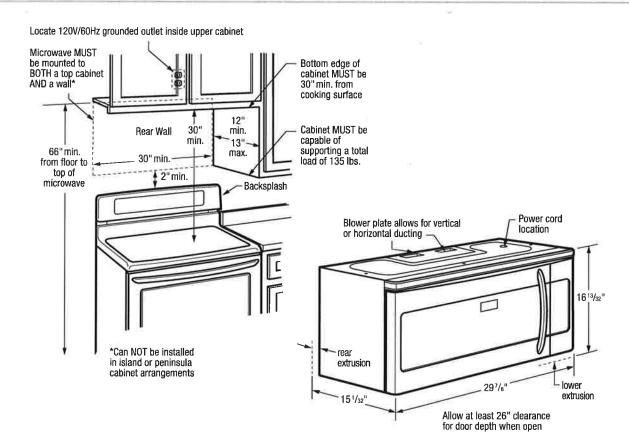
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### FRIGIDAIRE GALLERY.

### Microwaves

FGMV175Q F/W/B 30" Over-The-Range



### Microwave Specifications

- Product Shipping Weight (approx.) 63 Lbs.
- · Voltage Rating 120V/60 Hz/15 Amps
- · Connected Load (kW Rating) @ 120 Volts = 1.6 kW (For use on adequately wired 120V, dedicated circuit having 2-wire service with a separate ground wire. Appliance must be grounded for safe operation.)
- Amps @ 120 Volts = 15 Amps
- · Always consult local and national electric codes.
- · Grounded outlet should be located in cabinet above, with hole in base to route power cord. Carefully follow top template instructions for power cord clearance when installing beneath smooth, flat cabinets,
- Microwave's exhaust ventilation system is preset to recirculate air inside with no ducting system required. Exhausting air outside is optional, using either vertical or horizontal ducting system. (Refer to Ducted Option Specifications for outside ventilation.)
- For safe and proper installation, microwave MUST be mounted to BOTH a top cabinet AND a wall, and connected to at least one wall. stud. Can NOT be installed in island or peninsula cabinet arrangements.
- · Cabinet bottom MUST be level to insure proper installation
- · Cabinet MUST be capable of supporting a total load of 135 lbs.
- If the cabinet depth (including the cabinet doors) is more than 13" then the unit must be spaced out from the wall using adequate materials supporting 150 lbs. to allow proper top vent air exhaust.
- \* Filler blocks recommended for installation when cabinet front hangs below recessed bottom shelf.
- Minimum distance of 30" required from cooking surface to bottom edge of top cabinet.
- Minimum distance of 66" required from floor to top of microwave.
- Opening between cabinets MUST be 30" wide and free of obstructions. For openings up to 36" wide, order optional 36" Filler Panel Kit to fill in gap between unit and cabinets.
- · Allow 26" minimum clearance for 90° door swing.

### **Ducted Option Specifications**

- For outside ventilation.
- · Exhaust duct adapter will be needed for outside ventilation, to mate with standard 3-1/4" x10" rectangular duct. If round duct required, rectangular-to-round transition adapter will be needed with no less than 6" diameter.
- For most efficient airflow exhaust, use a straight run or as few elbows as possible with a maximum duct length of 3-1/4" x10" rectangular or 6" diameter round duct, not to exceed 120 equivalent feet,
- · For horizontal installation, be sure to allow enough space between wall studs to accommodate exhaust,
- · Refer to installation instructions on web for detailed duct preparation and converting exhaust vent blower system for exterior exhaust ventilation.

Note: For planning purposes only, Refer to Product Installation Guide on the web at frigidalre.com for detailed instructions.

#### Optional Accessories

- 36" Stainless Steel Filler Panel Kit (PN# MWFILKTSS).
- · 36" Stainless Steel Filler Panel Kit (PN# MWFILKTBK).
- 36" Stainless Steel Filler Panel Kit (PN# MWFILKTWH).

Accessories information available on the web at frigidaire.com



# EXHIBIT B

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COUNTY OF ONONDAGA			
DEAN MAURO,		:	Index No.
	Individually, and on behalf of	: :	
	all others similarly situated,	:	<u>SUMMONS</u>
	Plaintiff,	:	
v.		: :	
	DLUX HOME PRODUCTS, INC., HOME CENTERS, LLC,	: : :	
	Defendants.	: :	

SUPREME COURT OF THE STATE OF NEW YORK

To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Plaintiff designates Onondaga County as the place of trial. The basis of venue is Defendants transact business within New York or contract both within and without New York to supply goods or services within the state.

DATE: November 20, 2017 BY:\_/s/ Jason Zweig

Jason Zweig

HAGENS BERMAN SOBOL SHAPIRO LLP

555 Fifth Avenue, Suite 1700 New York, NY 10017

Telephone: (212) 752-5455 Facsimile: (917) 210-3980 Email: jasonz@hbsslaw.com

Simon B. Paris Patrick Howard Charles J. Kocher FILED: ONONDAGA COUNTY CLERK 11/20/2017 11:46 AM INDEX NO. 006569/2017

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1650 Market Street, 52nd Floor Philadelphia, PA 19103

Telephone: (215) 496-8282

Fax: (215) 496-0999

E-mail: sparis@smbb.com E-mail: phoward@smbb.com E-mail: ckocher@smbb.com

Daniel E. Gustafson Jason S. Kilene

### **GUSTAFSON GLUEK PLLC**

Canadian Pacific Plaza 120 South Sixth Street, Suite 2600

Minneapolis, MN 55402 Telephone: (612) 333-8844

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Anthony D. Shapiro Jeniphr Breckenridge

### HAGENS BERMAN SOBOL SHAPIRO LLP

1918 Eighth Avenue, Suite 3300

Seattle, WA 98101

Telephone: (206) 623-7292 Facsimile: (206) 623-0594 Email: tony@hbsslaw.com jeniphr@hbsslaw.com

### **Attorneys for Plaintiff and Proposed Class**

**TO:** Electrolux 10200 David Taylor Dr. Charlotte, NC 28262

Lowe's 1605 Curtis Bridge Road Wilkesboro, NC 28697

# EXHIBIT C

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## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

ERIKA MENDOZA, JAMES HUNT. individually and on behalf of all others similarly situated,

Plaintiffs,

v.

ELECTROLUX HOME PRODUCTS, INC.,

Defendant.

1:17-cv-00839-LJO-SKO

TO BE FILED UNDER SEAL

MEMORANDUM DECISION AND ORDER DENYING PLAINTIFF'S MOTION TO REMAND

(Dkt. Nos. 13, 36, 33, 44)

### I. INTRODUCTION

Before the Court is Plaintiffs' Motion to Remand, filed on July 24, 2017. (Dkt. No. 13). Defendant Electrolux Home Products, Inc. ("Electrolux") filed its Opposition on August 7, 2017 (Dkt. No. 36) and Plaintiff filed a Reply on August 15, 2017. (Dkt. No. 33). After the Court's preliminary review of the these submissions, it requested further development of the factual record in order to aid in its determination and authorized the Defendant to file a sur-reply addressing limited issued raised by Plaintiffs' Reply. (Dkt. No. 39). The Court further authorized Plaintiffs to file a response by September 8, 2017. (Id.). On August 25, 2017, Defendant filed a sur-reply. (Dkt. No. 44). Plaintiffs did not submit a response. The Court finds it appropriate to rule on the motion without oral argument. See Local Rule 230(g). Having considered the record in this case, the parties' briefing, and the relevant law, the Court denies Plaintiffs' Motion to Remand.

### II. BACKGROUND

The basis of this putative class action is Plaintiffs' assertion that Defendant's stainless steel microwave handles are defective. On May 19, 2017, Plaintiffs Mendoza and Hunt filed a complaint in the Superior Court of the State of California for the County of Stanislaus alleging three causes of action on behalf of themselves and similarly situated individuals: (1) violation of

California's Consumers Legal Remedies Act (Cal. Civ. Code § 1750 et seq.); (2) violation of California's Unfair Competition Law (Cal. Bus. & Prof. Code § 17200 et seq.); and (3) violation of California's Song-Beverly Consumer Warranty Act (Cal. Civ. Code § 1791 et seq.). (*See* Dkt. No. 1-1, Complaint ("Compl."), ¶¶ 62-98).

On June 22, 2017, Defendant removed the case to this Court, based on its assertion that the requisite amount in controversy to create diversity jurisdiction pursuant to the Class Action Fairness Act ("CAFA")(28 U.S.C §1332(d)) exceeds \$5 million exclusive of costs and interest. (Dkt. No. 1). By the motion filed on July 24, 2017 (Dkt. No. 13), Plaintiffs moved to remand the case, arguing that Defendant is unable to demonstrate that the amount in controversy exceeds the jurisdictional threshold required under §1332(d). Plaintiffs did not specify a damages amount in the Complaint.

### III. <u>LEGAL STANDARD</u>

"[A]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending." 28 U.S.C. § 1441(a). "To remove a case from state court to federal court, a defendant must file in the federal forum a notice of removal 'containing a short and plain statement of the grounds for removal." *Dart Cherokee Basin Operating Co., LLC v. Owens*, — U.S. —, 135 S. Ct. 547, 551 (2014) (quoting 28 U.S.C. § 1446(a)). However, "[i]f at any time before final judgment it appears that the district court lacks subject matter jurisdiction, the case shall be remanded." 28 U.S.C. § 1447(c).

CAFA vests federal courts with "jurisdiction over certain class actions, defined in § 1332(d)(1), if the class has more than 100 members, the parties are minimally diverse, and the amount in controversy exceeds \$5 million." *Dart*, 135 S. Ct. at 552 (citing 28 U.S.C § 1332(d)(2), (5)(B)). "[U]nder CAFA[,] the burden of establishing removal jurisdiction remains, as before, on the proponent of federal jurisdiction." *Abrego Abrego v. The Dow Chem. Co.*, 443

<sup>&</sup>lt;sup>1</sup> Plaintiffs also summarily stated that Electrolux's Notice of Removal is procedurally defective for failure to file the Notice in State Court pursuant to 28 U.S.C. §1446(d). (Dkt. No. 13 at 10). However, Defendant provided the stamped copy of the Notice of Removal that was filed with the State Court. (Dkt. No. 31, Ex. A).

F.3d 676, 685 (9th Cir.2006) (per curiam).

"If the plaintiff's complaint, filed in state court, demands monetary relief of a stated sum, that sum, if asserted in good faith, is 'deemed to be the amount in controversy." *Dart*, 135 S. Ct. at 551 (quoting 28 U.S.C. § 1446(c)(2)). "When plaintiff's complaint does not state the amount in controversy, the defendant's notice of removal may do so." *Id.* (citing 28 U.S.C. § 1446(c)(2)(A)); *see also Abrego*, 443 F.3d at 683.

Under CAFA, there is no presumption against removal. *Dart, 135* S. Ct. at 554. "Where facts are in dispute, the statute requires district courts to make factual findings before granting a motion to remand a matter to state court." *Mondragon v. Capital One Auto Fin.*, 736 F.3d 880, 883 (9th Cir.2013). On a plaintiff's motion to remand, it is a defendant's burden to establish jurisdiction by a preponderance of the evidence. *Dart*, 135 S. Ct. at 553–54; *see also Rodriguez v. AT & T Mobility Serv's. LLC*, 728 F.3d 975, 981 (9th Cir.2013).

In proving the amount in controversy, "[t]he parties may submit evidence outside the complaint, including affidavits or declarations, or other summary-judgment-type evidence relevant to the amount in controversy at the time of removal." *Ibarra v. Manheim Investments, Inc.*, 775 F.3d 1193, 1197 (9th Cir. 2015) (citation and internal quotation marks omitted). The parties submit summary-judgment style evidence and using the preponderance of evidence standard "the court decides...whether the amount-in-controversy requirement has been satisfied." *Dart*, 135 S. Ct. at 554; *see also Ibarra*, 775 F.3d at 1197. Thus, "removal ... is proper on the basis of [an] amount in controversy asserted' by the defendant 'if the district court finds, by the preponderance of the evidence, that the amount in controversy exceeds' the jurisdictional threshold." *Dart*, 135 S. Ct. at 553-54 (quoting 28 U.S.C. § 1446(c)(2)(B)). When a party relies on a chain of reasoning that includes assumptions to establish the amount in controversy, those assumptions must be reasonable. *Ibarra*, 775 F.3d at 1199 (assumptions "cannot be pulled from thin air but need some reasonable ground underlying them"). A defendant cannot establish removal jurisdiction by mere speculation, or prove the requirement on the basis of unreasonable assumptions. *Id.* at 1197.

### IV. DISCUSSION

 As discussed above, "CAFA gives federal courts jurisdiction over certain class actions ... if the class has more than 100 members, the parties are minimally diverse, and the amount in controversy exceeds \$5 million." *Dart*, 135 S. Ct. at 552. The parties do not dispute that the first two requirements of CAFA are satisfied. (*See* Dkt. No. 13 at 5; Dkt. No. 33 at 1; Dkt. No. 44 at 1). Thus, the single question put to the Court in Plaintiffs' Motion to Remand is whether Defendant has carried its burden to show the amount-in-controversy exceeds \$5 million. (*Id.*).

Citing certain statements Electrolux made in a case in the Middle District of Pennsylvania, Plaintiffs' Motion to Remand argues that Defendant is unable to establish the amount in controversy exceeds \$5 million. (Dkt. No. 13 at 5-8). In those prior statements Electrolux conceded it does not sell directly to consumers and thus was unable to tell the court in that case how many of a particular microwave ended up in Pennsylvania or any other jurisdiction. (Dkt. No. 13 at 3-4). Plaintiffs also take issue with the Notice of Removal's use of data regarding shipments of microwaves to retailers in California instead of data involving *actual sales* to class members. (Dkt. No. 13 at 8).

When a defendant's assertion of the amount in controversy is challenged, both sides submit proof and the court decides, by a preponderance of the evidence, whether the amount-in-controversy requirement has been satisfied. 28 U.S.C.A. § 1446(c)(2)(B); *Dart*, 135 S. Ct. at 554. Defendant's burden in this case is to "provide evidence establishing that it is 'more likely than not' that the amount in controversy exceeds [the jurisdictional threshold]." *Sanchez v. Monumental Life Ins. Co.*, 102 F.3d 398, 404 (9th Cir. 1996) (citation omitted). Under this framework, Defendant does not need to know the *exact number* of microwaves that were sold to California consumers in order to meet its burden.

The proposed class in this matter is defined as: "All persons in California who purchased a Microwave with a stainless steel handle since at least February 18, 2011 and continuing to the present." (Compl. ¶59). Plaintiffs allege that the class has "suffered actual damages in the amounts paid for the Microwaves with the Handle Defect, monies paid to replace them, and/or monies paid to remediate Handle Defect." (Compl. ¶74). "CAFA's requirements are to be tested by consideration of real evidence and the reality of what is at stake in the litigation, using

reasonable assumptions underlying the defendant's theory of damages exposure." *Ibarra*, 775 F.3d at 1198 (9th Cir. 2015). Accordingly, a reasonable and conservative estimate of the amount in controversy is the number of Electrolux microwaves with stainless steel handles sold to consumers in California multiplied by the replacement cost of each handle.

As Electrolux does not sell its microwaves directly to consumers, it is reasonable for Electrolux to use sales of microwaves with stainless steel handles to its California <u>retailers</u> as a proxy to estimate how many of such microwaves were purchased by persons in California. "As with other important areas of our law, evidence may be direct or circumstantial. In either event, a damages assessment may require a chain of reasoning that includes assumptions." *Ibarra*, 775 F.3d at 1199. It is reasonable to assume that it is more likely than not that microwaves sold to Electrolux's California retailers were purchased by persons in California. *See*, *e.g.*, *Sanchez v. Wal-Mart Stores*, *Inc.*, No. CIVS06CV2573DFLKJM, 2007 WL 1345706, at \*2 (E.D. Cal. May 8, 2007) ("It is reasonable to assume that defendants' California [retailers] sold their inventory...to California consumers.").

Defendant presented the declaration of Christopher Smith, an Electrolux employee, which included data Electrolux maintains concerning sales of microwaves to retailers in California. (Dkt. No. 35 at ¶¶3-6). In addition, the Smith Declaration presented data from Lowe's Companies, Inc. ("Lowe's), one of Electrolux's retailers, concerning direct sales of three microwave models with stainless steel handles to customers with a California address. (Dkt. No. 35 at ¶7).

Plaintiffs' Reply challenges the reliability of the evidence presented in the Smith Declaration. (Dkt. No. 33 at 4-9). Specifically, Plaintiffs argue that: (1) certain microwave models included in Defendant's estimation of the amount in controversy do not contain stainless steel handles and are thus not part of the putative class (*id.* at 4-5); (2) Defendant's measure of damages fails to provide evidence of a unit price of the microwaves (*id.* at 6-7); and (3) the Lowe's sales data constitutes inadmissible hearsay and cannot be considered in support of

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removal. (Id. at 7-9).<sup>2</sup> Based on the issues raised in the Reply, the Court requested supplemental evidence and briefing concerning assumptions underlying Defendant's estimate of the amount in controversy as well as Plaintiffs' hearsay objection. (Dkt. No. 39).<sup>3</sup>

In in his second Declaration, Electrolux employee Christopher Smith provides further evidence clarifying that the microwave models included in the data possess stainless steel handles. (Dkt. No. 46). The updated data set specifically excludes certain models where business records show that the handles were manufactured using aluminum and also excludes sales to regional distribution centers. (Dkt. No. 46 at ¶6-9). The Court is satisfied that the data presented in the second Smith Declaration includes only microwaves with stainless steel handles sold to California retailers. The second Smith Declaration also includes the manufacturers' suggested retail price ("MSRP") of each handle for each respective model. (Id. at ¶9). Lastly, Electrolux provides an additional declaration from a Lowe's employee to address Plaintiffs' hearsay objection to the Lowe's sales data. (Dkt. No. 45).<sup>4</sup>

The evidence submitted by Defendant shows that Defendant sold over 200,000 microwaves with stainless steel handles to retailers in California and the replacement cost for the handles of such microwaves ranged from \$90.07 to \$141.21, amounting to over \$24 million in potential damages, even excluding additional damages such as installation costs. (Dkt. No. 46 at ¶¶9-10).<sup>5</sup> Such a calculation appears to be a reasonable approximation of the amount in controversy in this matter. Even if not all Electrolux's sales to California retailers resulted in

<sup>&</sup>lt;sup>2</sup> The Court finds without merit Plaintiffs' argument that judicial admissions in a Pennsylvania District Court case prove that Electrolux is unable to determine the amount in controversy in this case (See Dkt. No. 33 at 2-3). Although in the Pennsylvania case. Electrolux did state it was "not going to be able to tell this Court how many of a particular microwave ended up on Pennsylvania or any other jurisdiction," this kind of statement is not normally binding in a subsequent lawsuit. See Nextdoor. Com, Inc. v. Abhyanker, No. C-12-5667 EMC, 2013 WL 3802526, at \*8 (N.D. Cal. July 19, 2013) (collecting cases in support of proposition that a statement made in one court proceeding is generally not considered binding in separate litigation); see also United States v. Williams, No. CRIM. 06-00079 JMS, 2014 WL 2436199, at \*6 (D. Haw. May 30, 2014) (same).

<sup>&</sup>lt;sup>3</sup> "A court may also consider supplemental evidence later proffered by the removing defendant, which was not originally included in the removal notice." Korn v. Polo Ralph Lauren Corp., 536 F. Supp. 2d 1199, 1205 (E.D. Cal. 2008) (citing Cohn v. Petsmart, Inc., 281 F.3d 837, 840 n. 1 (9th Cir. 2002)).

<sup>&</sup>lt;sup>4</sup> Although Plaintiffs were afforded an opportunity to respond to Defendant's additional submissions, Plaintiffs did not do so. Therefore, the Court assumes the additional declaration from a Lowe's employee obviates the need to address Plaintiffs' hearsay objection to Lowe's sales data being presented by Smith.

<sup>&</sup>lt;sup>5</sup> Plaintiffs allege in the Complaint that replacement cost of Plaintiff Mendoza's handle is \$124.19 and Plaintiff Hunt's handle is \$140.63. (Compl. ¶¶29-30).

sales to California consumers, a large portion likely did. In addition, the Lowe's Declaration shows that direct consumer sales of three models of Electrolux's stainless steel handle microwaves exceed \$6 million at Lowe's alone. (*See* Dkt. No. 45). In sum, Electrolux's retailer sales data in conjunction with actual sales data from just one of Electrolux's retailers shows that it is more likely than not that the amount in controversy exceeds \$5 million in this case. Therefore, the court concludes that Defendant has established by a preponderance of the evidence that the amount in controversy exceeds \$5 million.

### V. CONCLUSION AND ORDER

For the reasons stated above, IT IS HEREBY ORDERED that Plaintiffs' Motion to Remand (Dkt. No. 13) is denied. Correspondingly, Plaintiffs' request for attorneys' fees pursuant to 28 U.S.C. §1447(c) is also denied.

In an abundance of caution, the Court has filed this version of its Memorandum Decision and Order under seal, as the Court has relied upon sealed documents in its analysis. The Court intends to release a public version of its decision. Accordingly, the parties are directed to meet and confer and, on or before September 28, 2017, communicate to the court via email (to ljoorders@caed.uscourts.gov) whether any party believes any aspect of the decision should be redacted prior to its unsealing. The parties should specify the page and line numbers they propose for redaction and provide a justification for each redaction request.

IT IS SO ORDERED.

Dated: September 20, 2017 /s/ Lawrence J. O'Neill UNITED STATES CHIEF DISTRICT JUDGE

<sup>&</sup>lt;sup>6</sup> Plaintiffs also request attorneys' fees (Compl. ¶78). Therefore, the amount in controversy may include additional sums since an amount in controversy estimation may include attorneys' fees. *See Allchin v. Volume Servs., Inc.*, No. 215CV00886TLNEFB, 2016 WL 704616, at \*5 (E.D. Cal. Feb. 23, 2016) (citing *Guglielmino v. McKee Foods Corp.*, 506 F.3d 696, 700 (9th Cir. 2007).

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Attorneys for Defendants Electrolux Home

Products, Inc., and Lowe's Home Centers, LLC

# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

DEAN MAURO,

Individually and on behalf of others similarly situated,

Plaintiff,

v.

ELECTROLUX HOME PRODUCTS, INC., AND LOWE'S HOME CENTERS, LLC.,

Defendants.

Case No. 5:17-cv-1397 (TJM/DEP)

**CERTIFICATE OF SERVICE** 

### I, Loly G. Tor, of full age, certify as follows:

- 1. I am an attorney at law admitted to practice before this Court and a partner with the law firm of K&L Gates LLP, attorneys for Electrolux Home Products, Inc., and Lowe's Home Centers, LLC (together, "Defendants").
- 2. On December 30, 2017, I caused to be served via e-mail the following: (1) Defendants' Notice of Removal; (2) Civil Cover Sheet; and (3) this Certification of Service on the following counsel for Plaintiff:

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Patrick Howard
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I certify under penalty of perjury that the foregoing is true and correct.

s/ Loly G. Tor Loly G. Tor

Dated: December 30, 2017 Newark, New Jersey JS 44 (Rev. 06/17)

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as

provided by local rules of court purpose of initiating the civil de	t. This form, approved by the ocket sheet. (SEE INSTRUC	he Judicial Conference of the TIONS ON NEXT PAGE OF TI	HIS FORM.)	974, is required for the use of	f the Clerk of Court for the		
I. (a) PLAINTIFFS  Dean Mauro  (b) County of Residence of First Listed Plaintiff Onondaga County  (EXCEPT IN U.S. PLAINTIFF CASES)			DEFENDANTS	DEFENDANTS			
			Electrolux Home Products, Inc., and Lowe's Home Centers, LLC				
			NOTE: IN LAND CO	County of Residence of First Listed Defendant Mecklenburg County, NC  (IN U.S. PLAINTIFF CASES ONLY)  NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.			
(c) Attorneys (Firm Name, Jason Zweig, Hagens Be NY 10017, 212-752-5458 Mongeluzzi, Barrett & Be	erman Sobol Shapiro L 5 - Simon Paris & Cha	LLP, 555 Fifth Ave., N\ rles Kocher, Saltz	Attorneys (If Known) Loly G. Tor, K&L G 973-848-4000 loly.tor@klgates.co		Center, Newark, NJ 07102		
II. BASIS OF JURISDI	ICTION (Place an "X" in C	One Box Only)		RINCIPAL PARTIES	(Place an "X" in One Box for Plainti		
□ 1 U.S. Government Plaintiff	☐ 3 Federal Question (U.S. Government)	Not a Party)	(For Diversity Cases Only) PT Citizen of This State	TF DEF  1			
☐ 2 U.S. Government Defendant	★ 4 Diversity  (Indicate Citizensh	ip of Parties in Item III)	Citizen of Another State	2 🗖 2 Incorporated and of Business In			
			Citizen or Subject of a Foreign Country	3 🗖 3 Foreign Nation	□ 6 □ 6		
IV. NATURE OF SUIT		nly)  DRTS	FORFEITURE/PENALTY	Click here for: Nature BANKRUPTCY	of Suit Code Descriptions. OTHER STATUTES		
□ 110 Insurance □ 120 Marine □ 130 Miller Act □ 140 Negotiable Instrument □ 150 Recovery of Overpayment & Enforcement of Judgment □ 151 Medicare Act □ 152 Recovery of Defaulted Student Loans (Excludes Veterans) □ 153 Recovery of Overpayment of Veteran's Benefits □ 160 Stockholders' Suits □ 190 Other Contract □ 195 Contract Product Liability □ 196 Franchise □ REAL PROPERTY □ 210 Land Condemnation □ 220 Foreclosure □ 230 Rent Lease & Ejectment □ 240 Torts to Land □ 245 Tort Product Liability □ 290 All Other Real Property	PERSONAL INJURY  310 Airplane 315 Airplane Product Liability 320 Assault, Libel & Slander 330 Federal Employers' Liability 340 Marine 345 Marine Product Liability 350 Motor Vehicle Product Liability 360 Other Personal Injury 362 Personal Injury - Medical Malpractice  CIVIL RIGHTS 440 Other Civil Rights 441 Voting 442 Employment 443 Housing/ Accommodations 445 Amer. w/Disabilities - Employment 446 Amer. w/Disabilities - Other 315 Other 310 Other 320 Other 331 Other 344 Housing/ Accommodations 445 Amer. w/Disabilities - COther 3448 Education	PERSONAL INJURY  365 Personal Injury - Product Liability  367 Health Care/ Pharmaceutical Personal Injury Product Liability  368 Asbestos Personal Injury Product Liability  368 Asbestos Personal Injury Product Liability  PERSONAL PROPERTY  370 Other Fraud  371 Truth in Lending  380 Other Personal Property Damage Product Liability  PRISONER PETITIONS  Habeas Corpus:  463 Alien Detainee  510 Motions to Vacate Sentence  530 General  535 Death Penalty Other:  540 Mandamus & Other  550 Civil Rights  555 Prison Condition  560 Civil Detainee - Conditions of Confinement	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other	□ 422 Appeal 28 USC 158 □ 423 Withdrawal 28 USC 157  PROPERTY RIGHTS □ 820 Copyrights □ 830 Patent □ 835 Patent - Abbreviated New Drug Application □ 840 Trademark  SOCIAL SECURITY □ 861 HIA (1395ff) □ 862 Black Lung (923) □ 863 DIWC/DIWW (405(g)) □ 864 SSID Title XVI □ 865 RSI (405(g))  FEDERAL TAX SUITS □ 870 Taxes (U.S. Plaintiff or Defendant) □ 871 IRS—Third Party 26 USC 7609	□ 375 False Claims Act □ 376 Qui Tam (31 USC 3729(a)) □ 400 State Reapportionment □ 410 Antitrust □ 430 Banks and Banking □ 450 Commerce □ 460 Deportation □ 470 Racketeer Influenced and Corrupt Organizations □ 480 Consumer Credit □ 490 Cable/Sat TV □ 850 Securities/Commodities/ Exchange □ 890 Other Statutory Actions □ 891 Agricultural Acts □ 893 Environmental Matters □ 895 Freedom of Information Act □ 896 Arbitration □ 899 Administrative Procedure Act/Review or Appeal of Agency Decision □ 950 Constitutionality of State Statutes		
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DATE 12/30/2017		SIGNATURE OF ATTOR S/Loly G. Tor	NEY OF RECORD				
FOR OFFICE USE ONLY 0206-4238177 RECEIPT # AN	MOUNT \$400.00	APPLYING IFP	JUDGE	TJM MAG. JUJ	DEP		

#### INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- **I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- **II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
  - United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
  - Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
  - Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- **III. Residence** (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.
- **V. Origin.** Place an "X" in one of the seven boxes.
  - Original Proceedings. (1) Cases which originate in the United States district courts.
  - Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
  - Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
  - Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date. Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
  - Multidistrict Litigation Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407
  - Multidistrict Litigation Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket. **PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statue.
- VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. Do not cite jurisdictional statutes unless diversity. Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

  Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.

  Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases. This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

# **ClassAction.org**

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: <u>Lawsuit: Electrolux Over-the-Range Microwave Handles May Cause Burns</u>