

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

PATRICK SCHREIBER, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

SIG SAUER, INC., a Delaware corporation,

Defendant.

NO.

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

This case concerns a defectively designed pistol, the Sig Sauer P320. Sig Sauer designed the P320 without any external safety features, even though the pistol is effectively cocked (i.e., ready to fire) the moment a round is chambered. This is particularly galling because the P320 also has among the lightest and shortest trigger pulls of any comparable pistol on the market. The practical effect is that when consumers carry a loaded P320, it is akin to the consumer taking a loaded revolver, pulling the hammer back, and then walking around with that cocked pistol in the holster—all without any external safety features. As set forth herein, the combination of these features constitutes the Defect (as defined in paragraphs 17–25, *infra*) that uniformly exists in every P320.

But Sig Sauer does not tell consumers about the P320's Defect. Nor does Sig Sauer warn consumers that the P320 is extraordinarily dangerous compared to similar pistols. And what was the result? P320 users have experienced a slew of unintended discharges across the country. This has resulted in law enforcement agencies that purchased the pistols as duty

1 weapons having to replace their entire inventory, and scores of victims filing personal injury
 2 lawsuits against Sig Sauer due to the serious injuries caused by the P320's Defect—a Defect that
 3 is uniform among every P320 sold in Washington.

4 This case seeks to hold Sig Sauer responsible for selling a needlessly dangerous product
 5 to consumers through unfair and deceptive practices in violation of Washington law. Sig Sauer
 6 has known about the P320's Defect for years but has done nothing to remedy the issue. Rather,
 7 it has actively concealed the Defect from its customers and the public. As a result, all
 8 Washington consumers who purchased the P320 have received a product that has the same
 9 Defect and was sold using the same unfair and deceptive practices.

10 I. PARTIES

- 11 1. Plaintiff Patrick Schreiber is a citizen and resident of Washington.
- 12 2. Plaintiff purchased and currently owns a P320 without a manual safety.
- 13 3. Plaintiff purchased his P320 in Bothell, Washington beginning on November 21,
 14 2021.
- 15 4. Plaintiff reviewed Sig Sauer's website prior to purchase and saw Sig Sauer's
 16 representations concerning the safety of the P320. Nowhere did Plaintiff see anything about
 17 the Defect.
- 18 5. Plaintiff purchased his P320 new and paid approximately \$1,093.82 for the
 19 pistol.
- 20 6. Sig Sauer, Inc. is a Delaware corporation with a principal place of business at 72
 21 Pease Boulevard; Newington, New Hampshire 03801.
- 22 7. Sig Sauer designs, manufactures, and markets firearms, including the P320.

23 II. JURISDICTION AND VENUE

- 24 8. This Court has jurisdiction over this action under 28 U.S.C. § 1332(d) because
 25 there are more than 100 class members and the aggregate amount in controversy exceeds
 26

\$5,000,000, and at least one member of the proposed class is a citizen of a state different than Defendant.

9. Venue is proper in this District under 28 U.S.C. § 1391.

III. FACTUAL ALLEGATIONS

A. Overview

10. Sig Sauer is a firearms manufacturer that designs, manufactures, and markets a pistol known as the P320. *See P320 Pistols*, Sig Sauer (accessed Oct. 7, 2025), available at <https://www.sigsauer.com/firearms/pistols/p320.html>. A picture of the P320 is shown here:



P320 advertisement: “WE’LL TAKE IT FROM HERE”.

11. The P320 comes in various models (i.e., sizes, colors, etc.), but with respect to the pistol’s internal mechanisms, all P320s are designed and work the same with the same safety characteristics.

12. The P320 has a unique design in the United States pistol market, combining a very light, short trigger pull with a design that cocks and 97% energizes the weapon anytime it is loaded.

13. When a single action pistol is “cocked” (either by manually thumbing the hammer or by operation of the slide) three things occur. First, the pistol is energized so that it

1 has sufficient stored mechanical energy to discharge the primer of a loaded cartridge of
2 ammunition. Second, the trigger pull distance of the pistol is almost always shortened. And
3 third, the trigger pull weight of the pistol is almost always lessened.

4 14. The term “energize” describes the act of charging a pistol with mechanical
5 energy that can be released to discharge the firearm.

6 15. The P320 combines these features making the pistol easier to discharge, while
7 omitting any means of de-energizing the weapon when a round is chambered and omitting any
8 external safety device to prevent the trigger from moving.

9 16. All of the P320s at issue contain the same Defect (as defined in paragraphs 17-
10 25, *infra*).

11 **B. The Defect**

12 17. The Sig Sauer P320 is defective. The Defect has three components that, when
13 combined, create an unreasonably dangerous product for its reasonably anticipated use.

14 18. Those components are: (1) the P320 is effectively fully energized and ready to
15 fire the instant that a round is chambered; (2) the P320 has a minimal trigger pull because it is
16 short and lightweight; and (3) the P320 lacks any external safety features. These characteristics,
17 when combined, constitute “the Defect.”

18 19. Because of the Defect, the Sig Sauer P320 when chambered is functionally
19 equivalent to a cocked gun with no external safety features.

20 20. Sig Sauer does not inform customers that the P320 has sufficient energy to
21 discharge a bullet any time a round is chambered.

22 21. All P320s have a very short, light trigger pull. That means the P320’s trigger
23 requires less work to fire the pistol than the trigger on pistols made by other manufacturers.

24 22. Despite being fully energized with a short, light trigger pull, Sig Sauer did not
25 design the P320 to include any of the available external safety features routinely used on other
26 pistols. Such features may include a manual safety, trigger safety, or grip safety.
27

23. Sig Sauer knows that a manual safety would make the P320 safer.

24. Because the P320 is effectively cocked when loaded, the P320 is functionally equivalent to a single action pistol with the hammer cocked back, i.e., ready to fire and without any safety features to prevent it from firing.

25. Sig Sauer knows that just by looking at the P320, holding the P320, racking the P320's slide, or even firing the P320, a reasonable consumer could not determine what the action type of the P320 is. In other words, consumers would not know that the P320 is fully energized and ready to fire.

26. Sig Sauer has been aware of the P320's Defect since at least 2017 and has maintained that information solely within its possession. Despite the P320's Defect and known design risks, Sig Sauer refuses to warn customers about the P320's dangers or modify its design in any way.

C. All P320s have the Defect.

27. While the P320 comes in a variety of sizes and with a variety of optional add-ons, all P320s share the same design and safety characteristics because they all contain the same "fire control unit." According to Sig Sauer, the fire control unit is "the component (frame) that houses a majority of the key functional parts of some handguns; including parts such as the trigger, sear, and slide catch lever; and is the serialized part of the firearm."

28. Similarly, the large, medium, and small sizes of the P320's grip module do not impact the functionality of the P320. Sig Sauer defines the grip module as "a polymer or alloy component of a handgun that houses the primary firing components, including the trigger, sear, hammer, or striker."

29. Additionally, the full size, compact, and subcompact versions of the P320 do not impact the functionality of the P320.

30. The P320 also comes in different models or variants, such as the P320X variant, which has a different shaped handle, but all the variants and models still contain the Defect. For

1 example, the P320X has the same fire control unit as the standard issued P320 and none of the
2 ergonomic differences in the P320X change the way the P320 mechanically works, including its
3 safety features.

4 31. The different magazine sizes that correspond to different grip sizes of the P320
5 also do not impact the P320's basic mechanical functions.

6 32. Ultimately, the different versions of the P320 all mechanically function the same
7 and use the same fire control unit.

8 **D. The origin of the P320**

9 33. The P320 was originally based off a Sig Sauer pistol design called the P250. The
10 P250 is a discontinued pistol.

11 34. Prior to being discontinued, the P250 was removed from consideration in 2010
12 by the United States Bureau of Alcohol, Tobacco, and Firearms due to reliability and safety
13 concerns.

14 35. In 2012, Sig Sauer pivoted from the P250 to the P320 with the goal of developing
15 "a striker fired pistol capable of using the P250 grip modules," along with other common parts,
16 including a pre-existing inventory of barrels the company had in storage. In other words, Sig
17 Sauer was trying to use the leftover parts of the P250 in a new firearm—the firearm that would
18 become the P320.

19 36. Before working on the P320, no one on the P320's design team had ever
20 designed a striker fired pistol.

21 37. Indeed, Sig Sauer's engineering team was sidelined during the design phase of
22 the P320. Instead, Sig Sauer's marketing department had substantial control over the final
23 design of the pistol.

24 38. Sig Sauer's engineers did not decide that the P320 should have such a light
25 trigger—that decision was approved as "a marketing call."
26
27

39. The P320 was originally designed to have both a thumb safety and a trigger safety. But, again, Sig Sauer's marketing team decided to remove those as standard safety features, and—in the case of the trigger safety—decided not to offer it as an option.

E. Sig Sauer knew of the Defect.

a. Sig Sauer determined that each P320 is at a "high risk" to "kill [a] person unintentionally."

40. In February 2017—over eight years before the commencement of this suit and before Plaintiff purchased his P320—Sig Sauer evaluated the safety hazards of the P320 and reported them to the U.S. Army as part of the contract process to supply the P320 as the military's next pistol. The name of the evaluation was the "MHS Pistol Failure Modes, Effects, and Criticality Analysis (FMECA)."

41. The risk assessment identified the P320 as having a "high" risk for having an accidental discharge that could kill a person unintentionally:

Potential Failure Mode (results in a loss of "Function" or realization of a hazard)	Potential Cause of Failure (Prob of Occurrence)	O	Potential Effect of Failure (Severity Function)	S	Risk Assessment Matrix Level
Pistol accidentally / unintentional discharges	Accidental trigger pull (Operator error) Finger on trigger	C	Kill person unintentionally	1	High
Pistol accidentally / unintentional discharges	Accidental trigger pull (Foreign Object)	C	Kill person unintentionally	1	High

42. Further, Sig Sauer evaluated those unintentional discharge risks as "likely to occur sometime[] in the life of an item." Put another way, Sig Sauer admits that every P320 unit is likely to suffer an unintended discharge during the life of each pistol.

43. This risk assessment of "catastrophic" is shown on the risk assessment matrix below:

RISK ASSESSMENT MATRIX				
SEVERITY PROBABILITY	Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
Frequent (A)	High	High	Serious	Medium
Probable (B)	High	High	Serious	Medium
Occasional (C)	High	Serious	Medium	Low
Remote (D)	Serious	Medium	Medium	Low
Improbable (E)	Medium	Medium	Medium	Low
Eliminated (F)	Eliminated			

44. The FMECA identified safety measures that would decrease the P320's likelihood of unintentional discharge, which included employing a manual thumb safety and training according to a particular Army field manual.

45. Thus, since at least February of 2017, Sig Sauer has known about the dangerous design of the P320.

46. But even after identifying safety measures to decrease the P320's likelihood of unintentional discharge, and even in the face of the known likelihood, Sig Sauer refuses to adopt any external safety features for the P320.

47. Sig Sauer did not disclose the above-described catastrophic risk of the P320 to consumers. To the contrary, it took purposeful measures to prevent this information from entering the public domain.

F. Sig Sauer knows that the P320's Defect injures consumers and law enforcement.

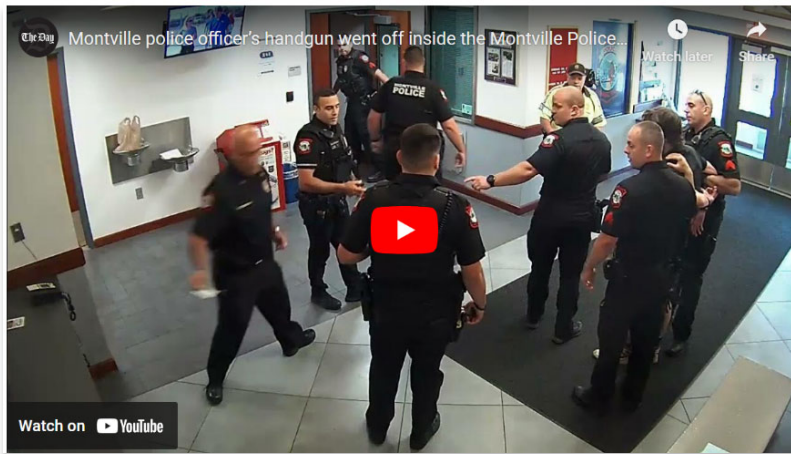
48. Several national news outlets—like ABC News and the Washington Post— have reported on consumers across the country who have been injured due to inadvertent discharges of the P320. *See, e.g., Detective sues Sig Sauer after she says her holstered P320*

1 *handgun nearly killed her*, ABC News (Aug. 24, 2021) (accessed October 7, 2025), available at
 2 [https://abcnews.go.com/US/detective-sues-sig-sauer-holstered-p320-handgun-](https://abcnews.go.com/US/detective-sues-sig-sauer-holstered-p320-handgun-killed/story?id=79605906)
 3 [killed/story?id=79605906](https://abcnews.go.com/US/detective-sues-sig-sauer-holstered-p320-handgun-killed/story?id=79605906).

4 49. The Washington Post reported in April last year, “At least 80 people, including
 5 police officers, allege they were shot by their SIG Sauer P320 pistols.” *Popular handgun fires*
 6 *without anyone pulling the trigger, victims say*, Wash. Post (April 11, 2023).

7 50. For its part, Sig Sauer has collected four binders’ worth of incident reports
 8 concerning the P320 that its senior customer service manager keeps at his home. But the
 9 custodian of those binders does not collect incident reports from any other firearm that Sig
 10 Sauer manufactures. Thus, even within Sig Sauer, the P320 stands alone.

11 51. Sig Sauer states that it has received over 200 complaints of unintended
 12 discharges of the P320, far more than any other pistol it manufactures. And several have been
 13 captured on video and reported in the media. Police1, *Conn. police department to replace all*
 14 *officers’ handguns due to safety concerns*:



24 (July 28, 2023) (accessed Oct. 7, 2025), available at [https://www.police1.com/police-](https://www.police1.com/police-products/firearms/articles/conn-police-department-to-replace-all-officers-handguns-due-to-safety-concerns-shVuKA0s4AlcvJze/)
 25 [products/firearms/articles/conn-police-department-to-replace-all-officers-handguns-due-to-](https://www.police1.com/police-products/firearms/articles/conn-police-department-to-replace-all-officers-handguns-due-to-safety-concerns-shVuKA0s4AlcvJze/)
 26 [safety-concerns-shVuKA0s4AlcvJze/](https://www.police1.com/police-products/firearms/articles/conn-police-department-to-replace-all-officers-handguns-due-to-safety-concerns-shVuKA0s4AlcvJze/)
 27

52. Sig Sauer dismisses these videos and news reports as “anti-gun” or perhaps fraudulent, even comparing them to videos of Bigfoot.

53. Indeed, Sig Sauer’s response to customer complaints and media reports about the P320 has been a strategy of denial. Sig Sauer’s internal documents show that the company blames the “anti-gun media” (Option 1), the injured officers and their lawyers (Option 2), or even its competitor, Glock (Option 3):

Statement 07/27

Option 1 (News):

We are disappointed, but not surprised, that a liberal, anti-gun media outlet like ABC has chosen to report and sensationalize frivolous lawsuits being propagated by trial lawyers as newsworthy.

Option 2 (Trial Lawyers)

Once again, this lawsuit is a result of unsupported allegations and claims being propagated by trial attorneys seeking personal financial gain for a negligent discharge caused by the (insert officer if LE) mishandling and/or misuse of the firearm.

Option 3: (GLOCK)

We are not surprised that our competitor has decided to participate in sensationalizing false claims that seek to undermine the success of the P320. This is nothing more than an act of desperation due to their inability to prove themselves in a head-to-head match up with us.

Sig Sauer email dated July 27, 2021, and attachment (emphasis in original).

54. Given these concerns, several law enforcement agencies have decided the P320 is no longer safe to use. This includes the recent ban issued by the U.S. Immigration and Customs Enforcement (ICE). *The Surprising FBI evaluation and ICE ban of the troubled Sig Sauer P320*, Yahoo News (July 10, 2025) (accessed Oct. 7, 2025), available at <https://www.yahoo.com/news/surprising-fbi-evaluation-ice-ban-153437096.html>.

55. ICE issued a memo to remove the P320, written by Madison D. Sheahan, Deputy Director at ICE, with the subject titled “Discontinuation of Approval for ICE Authorized Officers

to Carry All Models of the SIG Sauer P320 and Direction to Purchase Glock 19s as Replacement Duty Handguns for Affected ICE Officers and All ICE AOs Moving Forward.”¹

56. Likewise, the National Law Enforcement Firearms Instructors Association recently banned all P320 models from use in all of its training courses. *Nation’s Law Enforcement Instructors Declare SIG P320 Unsafe for Training*, SOFREP (July 29, 2025) (accessed Oct. 7, 2025), available at <https://sofrep.com/news/nations-law-enforcement-instructors-declare-sig-p320-unsafe-for-training/>.

57. Other agencies that have removed the P320 as their duty weapon include, but are not limited to:

- **Chicago Police Department.** *Sig Sauer’s P320 banned by Chicago Police Department and other law enforcement agencies*, WE ARE THE MIGHTY (June 25, 2025) (accessed Oct. 7, 2025), available at <https://www.yahoo.com/news/sig-sauer-p320-banned-chicago-154300609.html>.
- **Milwaukee, Wisconsin Police Department.** *Milwaukee Police to replace all officer weapons following ‘unexpected’ discharges*, Spectrum News 1 (Oct. 31, 2022) (accessed Oct. 7, 2025), available at <https://spectrumnews1.com/wi/milwaukee/news/2022/10/31/milwaukee-police-to-replace-all-officer-weapons-following-unexpected-discharges>.
- **Philadelphia Transit Police.** *Philadelphia Transit Police Scrap SIG Sauer Pistols After Incident*, New Hampshire Public Radio (September 11, 2019) (accessed Oct. 7, 2025), available at <https://www.nhpr.org/post/philadelphia-transit-police-scrap-sig-sauer-pistols-after-incident>.
- **Ventura, California Police Department.** *Ventura Police Department Approves \$300k for Smith and Wesson M&P 2 Handgun Purchase*, Citizen Portal (Sept. 25, 2025) (accessed Oct. 7, 2025), available at <https://citizenportal.ai/articles/5827510/Oxnard-City/Ventura-County/California/Ventura-Police-Department-Approves-300K-for-Smith-and-Wesson-MP-2-Handgun-Purchase>.

¹ Available at https://www.wearethemighty.com/wp-content/uploads/2025/07/IMG_3294.jpeg (accessed October 7, 2025).

- 1 • **North Dakota Highway Patrol.** *Factory recall: Safety warning with Sig Sauer P320*
2 *pistol*, Blue Line (Dec. 15, 2017) (accessed Oct. 7, 2025), available at
3 [https://www.blueline.ca/factory-recall-safety-warning-with-sig-sauer-p320-pistol-](https://www.blueline.ca/factory-recall-safety-warning-with-sig-sauer-p320-pistol-5052/#:~:text=Other%20agencies%20such%20as%20North,sent%20back%20to%20the%20factory.)
4 [5052/#:~:text=Other%20agencies%20such%20as%20North,sent%20back%20to%20the%20factory.](https://www.blueline.ca/factory-recall-safety-warning-with-sig-sauer-p320-pistol-5052/#:~:text=Other%20agencies%20such%20as%20North,sent%20back%20to%20the%20factory.)
- 5 • **Montville, Connecticut Police Department.** *Conn. Police department to replace all*
6 *officers' handguns due to safety concerns*, Police 1 (July 28, 2023) (accessed Oct. 7,
7 2025), available at [https://www.police1.com/police-](https://www.police1.com/police-products/firearms/articles/conn-police-department-to-replace-all-officers-handguns-due-to-safety-concerns-shVuKA0s4AlcvJze/)
8 [products/firearms/articles/conn-police-department-to-replace-all-officers-](https://www.police1.com/police-products/firearms/articles/conn-police-department-to-replace-all-officers-handguns-due-to-safety-concerns-shVuKA0s4AlcvJze/)
9 [handguns-due-to-safety-concerns-shVuKA0s4AlcvJze/](https://www.police1.com/police-products/firearms/articles/conn-police-department-to-replace-all-officers-handguns-due-to-safety-concerns-shVuKA0s4AlcvJze/).
- 10 • **Brookfield, Connecticut Police Department.** *Some Connecticut police are replacing*
11 *a handgun that can reportedly fire without being triggered*, Newstimes (April 30,
12 2024) (accessed Oct. 7, 2025), available at
13 [https://www.newstimes.com/local/article/ct-police-sig-sauer-guns-safety-](https://www.newstimes.com/local/article/ct-police-sig-sauer-guns-safety-19404483.php)
14 [19404483.php](https://www.newstimes.com/local/article/ct-police-sig-sauer-guns-safety-19404483.php).
- 15 • **Orange, Connecticut Police Department.** *Some Connecticut police are replacing a*
16 *handgun that can reportedly fire without being triggered*, Newstimes (April 30,
17 2024), available at [https://www.newstimes.com/local/article/ct-police-sig-sauer-](https://www.newstimes.com/local/article/ct-police-sig-sauer-guns-safety-19404483.php)
18 [guns-safety-19404483.php](https://www.newstimes.com/local/article/ct-police-sig-sauer-guns-safety-19404483.php).
- 19 • **Morrow, Alabama Police Department.** *Morrow police chief pulls Sig Sauer['s] guns*
20 *from service*, Alive (Aug. 10, 2017) (accessed Oct. 7, 2025), available at
21 [https://www.11alive.com/article/news/local/morrow-police-chief-pulls-sig-sauers-](https://www.11alive.com/article/news/local/morrow-police-chief-pulls-sig-sauers-guns-from-service/85-463471360)
22 [guns-from-service/85-463471360](https://www.11alive.com/article/news/local/morrow-police-chief-pulls-sig-sauers-guns-from-service/85-463471360).
- 23 • **Bridge City, Texas Police Department.** *Lawsuit: Semi-automatic police service gun*
24 *goes off by itself, nearly killing detective*, ABC News (August 25, 2021) (accessed
25 Oct. 7, 2025), available at [https://abc11.com/sig-sauer-lawsuit-p320-pistol-](https://abc11.com/sig-sauer-lawsuit-p320-pistol-brittney-hilton-accidental-discharge/10974219/)
26 [brittney-hilton-accidental-discharge/10974219/](https://abc11.com/sig-sauer-lawsuit-p320-pistol-brittney-hilton-accidental-discharge/10974219/).
- 27 • **Burnet City, Texas Police Department.** *BPD transitions to new duty gun to replace*
problematic firearm, Daily Trib (Oct. 24, 2024) (accessed Oct. 7, 2025), available at
[https://www.dailytrib.com/2024/10/24/bpd-transitions-to-new-duty-gun-to-](https://www.dailytrib.com/2024/10/24/bpd-transitions-to-new-duty-gun-to-replace-problematic-firearm/)
[replace-problematic-firearm/](https://www.dailytrib.com/2024/10/24/bpd-transitions-to-new-duty-gun-to-replace-problematic-firearm/).
- **Marble Falls, Texas Police Department.** *MFPD recalls sidearms after accidental*
gun discharge at school, Daily Trib (Sep. 24, 2024) (accessed Oct. 7, 2025),
available at [https://www.dailytrib.com/2024/09/24/mfisd-officer-injured-in-](https://www.dailytrib.com/2024/09/24/mfisd-officer-injured-in-accidental-gun-discharge-on-campus/)
[accidental-gun-discharge-on-campus/](https://www.dailytrib.com/2024/09/24/mfisd-officer-injured-in-accidental-gun-discharge-on-campus/).
- **Indian River County, Florida Sheriff's Office.** *Indian River County Sheriff's Office*
switches to new firearm after deputy injured in unintended discharge, 5 WPTV

West Palm Beach (Dec. 4, 2023) (accessed Oct. 7, 2205), available at <https://www.wptv.com/news/treasure-coast/region-indian-river-county/indian-river-county-sheriffs-office-new-weapons-12-4-23>.

58. These concerns continue to mount. In October 2024, the Washington State Criminal Justice Training Commission issued a memo stating that it “has become aware of a serious safety concern with the Sig Sauer P320,” and that “during a Basic Law Enforcement Academy (BLEA) firearms training, a student experienced a premature discharge with their agency issued firearm,” which led the Commission to discover a separate incident involving the P320 in Washington state earlier in 2024. Accordingly, the Commission decided that it “will not authorize the use of the Sig Sauer P320 in our agency-owned or contracted training facilities until further notice.”

59. And in November 2024, a CBS news outlet reported on—and published video footage of—an officer who was nearly killed when the P320 discharged in his holster while he was walking. *It happened again: Texas officer injured by holstered SIG SAUER P320*, CBS | Austin (Nov. 1, 2024) (accessed Oct. 7, 2025), available at <https://cbsaustin.com/news/local/it-happened-again-texas-officer-injured-by-holstered-sig-sauer-p320>.



<https://cbsaustin.com/news/local/it-happened-again-texas-officer-injured-by-holstered-sig-sauer-p320>

G. Sig Sauer Doubles Down on the P320

60. Despite all these warning signs—including its own internal analysis—Sig Sauer’s website formerly touted the P320’s safety by stating:

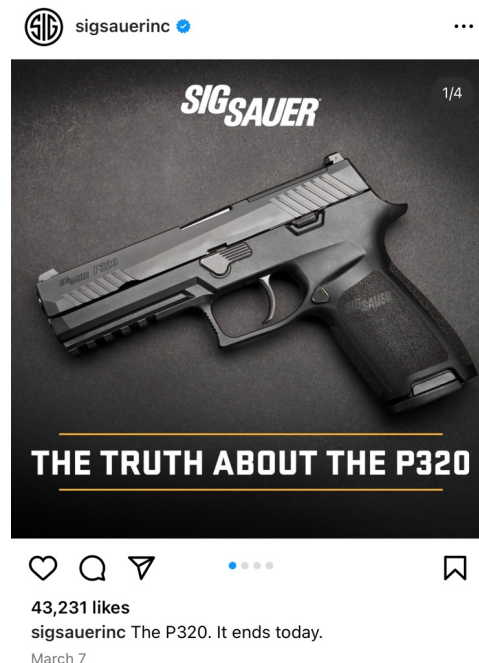
We’ve designed safety elements into every necessary feature on this pistol. From the trigger, to the striker and even the magazine, the P320 won’t fire unless you want it to.

Trigger warning, CNN (June 6, 2018) (accessed Oct. 7, 2025), available at <https://www.cnn.com/interactive/2018/06/investigates/sig-sauer-p320-drop-fire/>.

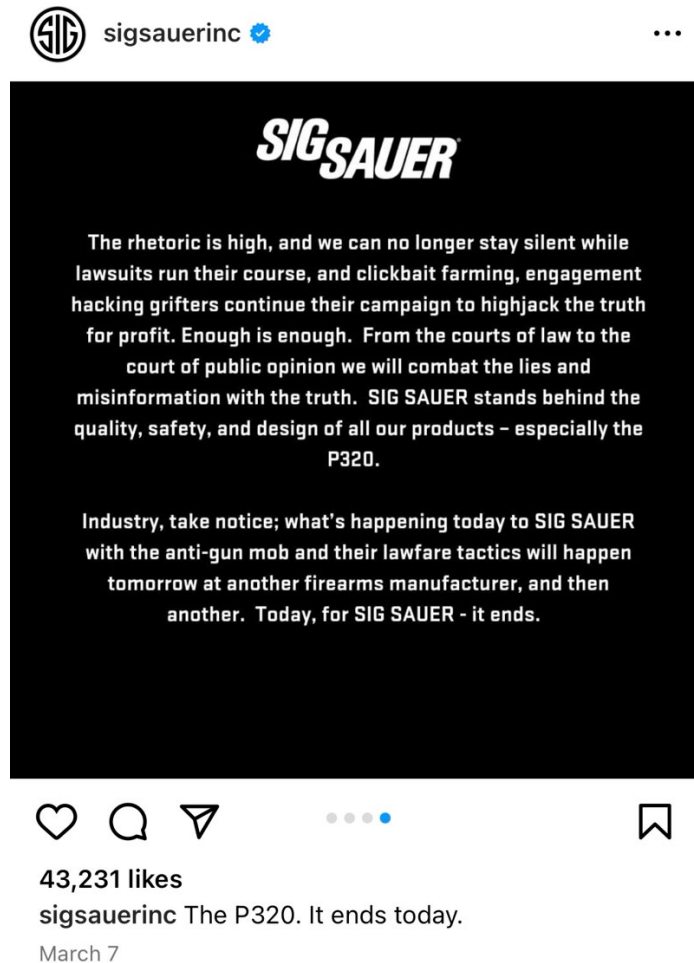
61. Now, the P320’s landing page has a bolded, fully capitalized header that states: “SAFETY WITHOUT COMPROMISE.” (accessed Oct. 7, 2025), available at <https://www.sigsauer.com/firearms/pistols/p320.html>.

62. Underneath the heading, Sig Sauer states, “Safety isn’t negotiable. The P320 maximizes peace of mind with a robust safety system . . .” *Id.*

63. In March 2025, Sig Sauer launched a social media campaign across various platforms exclaiming, “THE TRUTH ABOUT THE P320,” and stating that, when it comes to the P320, “It ends today.”



64. In other slides, the same post cast aspersions against anyone drawing attention to the P320's serious problems—calling them “clickbait farming, engagement hacking grifters” and the “anti-gun mob” while accusing anybody who challenges the P320's safety of engaging in “lawfare.” The full post reads:



65. Despite Sig Sauer's position on social media, in the U.S. District Court for the District of New Hampshire alone, 64 plaintiffs filed consolidated complaints in June of 2024, alleging they were injured by inadvertent P320 discharges. *See In Re: Sig Sauer P320 Products Liability Litigation*, No. 22-CV-536 (D.N.H.), ECF Nos. 63-72.

66. And in a related action, another 39 individuals have filed a consolidated action against Sig Sauer. *See Anderson et al. v. Sig Sauer, Inc.*, No. 25-CV-113 (D.N.H.).

67. To date, injured individuals have filed no fewer than 32 additional cases against Sig Sauer in federal courts across the country, alleging inadvertent discharge of the P320, with many of the victims being law enforcement agents:

Personal Injury Suits Against Sig Sauer Concerning P320				
Case Name ²	Law Enforcement Plaintiff	Jurisdiction	Case No.	Date Filed
<i>Vadnais v. Sig Sauer*</i>	Sheriff	E.D. Va.	18-CV-540	May 4, 2018
<i>Mayes v. Sig Sauer*</i>	Former law enforcement	W.D. Ky.	19-CV-146	Oct. 16, 2019
<i>Frankenberry v. Sig Sauer*</i>	Former Police Officer	D. S.C.	19-CV-2990	Oct. 22, 2019
<i>Jinn v. Sig Sauer*</i>	Homeland Security Special Agent	S.D.N.Y.	20-CV-1122	Feb. 10, 2020
<i>Hoefs v. Sig Sauer*</i>	x	W.D. Wash.	20-CV-5173	Feb. 26, 2020
<i>Williams v. Sig Sauer*</i>	x	E.D. Ky.	20-CV-78	May 22, 2020
<i>Guay v. Sig Sauer*</i>	x	D. N.H.	20-CV-736	July 2, 2020
<i>Powers v. Sig Sauer*</i>	Former U.S. Sergeant	M.D. Fla.	20-CV-2026	Aug. 28, 2020
<i>Haynes v. Sig Sauer*</i>	Police Officer	N.D. Ga.	20-CV-4218	Oct. 13, 2020
<i>Schneider v. Sig Sauer*</i>	x	D. N.H.	20-CV-1190	Dec. 18, 2020
<i>Watson v. Sig Sauer*</i>	x	N.D. Tex.	21-CV-106	Jan. 29, 2021
<i>Slatowski v. Sig Sauer*</i>	Deportation Officer with ICE	E.D. Pa.	21-CV-729	Feb. 17, 2021
<i>Campbell v. Sig Sauer*</i>		W.D. Mo.	21-CV-5047	May 19, 2021
<i>Ahern v. Sig Sauer</i>	Detective Lieutenant	D. Mass.	21-CV-11007	June 16, 2021
<i>Hilton v. Sig Sauer*</i>	Detective	E.D. Tex.	21-CV-441	Aug. 16, 2021
<i>Collette v. Sig Sauer*</i>	Police Officer	D. Mass.	21-CV-11392	Aug. 25, 2021
<i>Lang v. Sig Sauer*</i>	x	N.D. Ga.	21-CV-4196	Oct. 11, 2021
<i>Herman v. Sig Sauer*</i>	x	W.D. Okla.	21-CV-1038	Oct. 25, 2021
<i>Colwell v. Sig Sauer*</i>	Police Officer	N.D.N.Y.	21-CV-1200	Nov. 2, 2021

² Case names denoted with an "*" are no longer pending.

Personal Injury Suits Against Sig Sauer Concerning P320

Case Name²	Law Enforcement Plaintiff	Jurisdiction	Case No.	Date Filed
<i>Davis v. Sig Sauer*</i>		E.D. Ky.	22-CV-10	Feb. 1, 2022
<i>Catatao v. Sig Sauer*</i>	Police Officer	D. Mass.	22-CV-10620	April 26, 2022
<i>White v. Sig Sauer*</i>	Police Officer	N.D. Ga.	22-CV-1985	May 18, 2022
<i>Williams v. Sig Sauer*</i>	x	E.D. N.C.	22-CV-48	May 18, 2022
<i>Winingham v. Sig Sauer*</i>	x	D. Ariz.	22-CV-1037	June 16, 2022
<i>Desrosiers v. Sig Sauer</i>	Police Officer	D. Mass	22-CV-11674	Oct. 3, 2022
<i>Valentino v. Sig Sauer*</i>	Special Agent, Homeland Security	D. N.J.	23-CV-1309	March 8, 2023
<i>Hall v. Sig Sauer</i>	Police Officer	M.D. Pa.	23-CV-978	June 13, 2023
<i>Cole v. Sig Sauer</i>	Sheriff	D. Maine	23-CV-327	Aug. 23, 2023
<i>Jantz v. Sig Sauer</i>	x	D. Colo.	24-CV-15	Jan. 3, 2024
<i>Barmore v. Sig Sauer*</i>	Police Officer	W.D. Lou.	24-CV-56	Jan. 16, 2024
<i>Torres v. Sig Sauer</i>	Police Officer	D. P.R.	24-CV-1441	Sept. 20, 2024
<i>Gomelskaya v. Sig Sauer</i>	x	Penn. Cty. Ct. of Common Pleas	241200470	Dec. 3, 2024
<i>Currington, et al. v. Sig Sauer</i>	Police Officers	D.N.H.	25-CV-26	Jan. 13, 2025
<i>Orrson v. Sig Sauer</i>	Sheriff	S.D. Tex.	25-CV-1776	April 17, 2025

68. These cases are often tragic. For example, in *Gomelskaya*, the underlying incident involved the P320 inadvertently discharging into a man's femoral artery. The victim bled out and died. The victim's widow filed the case individually and on behalf of her deceased husband's estate.

69. And in late 2024, a jury sitting in the U.S. District Court for the Northern District of Georgia awarded a man \$2.35 million for pain, suffering, and medical damages, finding that the P320 was defectively designed after it shot through the man's leg while he pulled it out of his holster. See Verdict Form, *Lang v. Sig Sauer, Inc.*, No. 21-CV-4196 (June 20, 2024), ECF No. 131.

1 **H. The P320 is unique in the firearms industry.**

2 70. Pistols that are comparable to the P320, like the Glock 17 or the Smith & Wesson
3 M&P, use a combination of longer, heavier trigger pulls with a trigger safety to require more
4 intentionality to fire.

5 71. Other comparable pistols, like most model 1911s, use a combination of a grip
6 safety and a manual thumb safety along with a longer, heavier trigger pull to require more
7 intentionality to fire. Most model 1911s also include a de-cocking lever to safely de-energize
8 the weapon before holstering. The Walter P99 and the Sig Sauer P229 also incorporate de-
9 cocking levers.

10 72. Indeed, a firearms expert has conducted a survey of over 45 comparable
11 firearms and confirmed that the P320 is the only firearm of its type to contain all three
12 components of the Defect in one model. In this respect, the P320 stands alone within the
13 firearms industry.

14 **I. Sig Sauer uniformly conceals the Defect from consumers.**

15 73. Sig Sauer is aware that the company knows more about the P320 than a
16 reasonable consumer does. Typical consumers do not have the scientific or engineering
17 background necessary to determine whether the P320's internal mechanisms are defective.

18 74. And Sig Sauer designed the P320 with knowledge that the product was going to
19 be sold to the general public for a price, and it expected that consumers would purchase the
20 P320 for their personal use, including everyday carry. For instance, Sig Sauer knows that users
21 routinely keep a round chambered in their pistol.

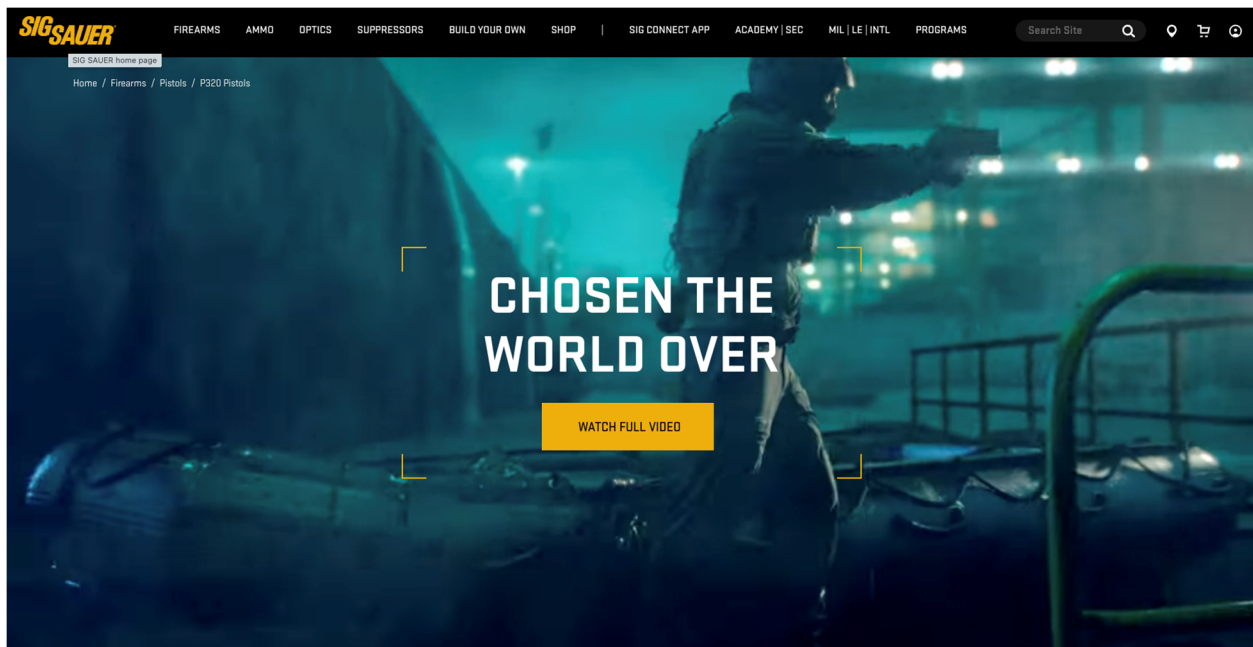
22 75. Even though Sig Sauer knows the P320 is harming individuals across the country,
23 it has not made any design changes to the P320 in the last several years. Instead, Sig Sauer
24 engages in the dissemination of counter-information in response to stories concerning
25 inadvertent discharges of the P320.

26 76. Sig Sauer purchases advertisements that are delivered to consumers through
27 print advertising in magazines, television, and social media. It purchases national ad buys for its

advertisements in magazines and Plaintiff is unaware of any limitation to those advertisements being distributed within Washington.

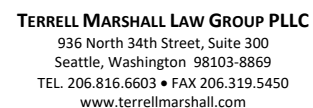
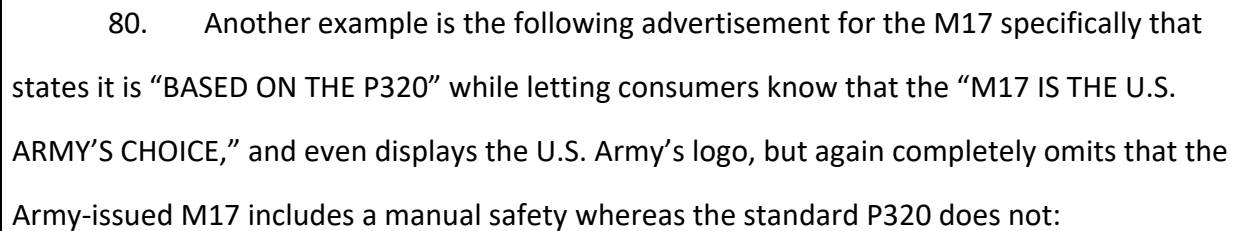
77. In addition to omitting information concerning the design of the P320, the advertisements further conceal the Defect by equating the standard P320 (with no external safety features) with the military-issued M17 and M18 (both of which include a manual safety). Simply put, Sig Sauer attempts to leverage its relationship with the Department of Defense to sell more pistols to civilian consumers and often relies on military iconography to achieve that goal, even though the military and civilian versions of the pistols are markedly different.

78. For example, the screen shot below is from Sig Sauer's P320 homepage—not the page specifically dedicated to the M17 or M18—where Sig Sauer depicts a man in military combat gear brandishing the P320, which is described by Sig Sauer as “CHOSEN THE WORLD OVER”:



See *P320 Pistols*, Sig Sauer (accessed Oct. 16, 2024), available at <https://www.sigsauer.com/firearms/pistols/p320.html>.

79. The following example demonstrates how Sig Sauer advertises the P320 specifically—without reference to the M17 or M18—by depicting an individual in military



J. The proposed class is uniformly damaged by Sig Sauer’s conduct.

81. The P320 pistols that Washington consumers purchased were defective at the time of acquisition. As a result, consumers overpaid for the products, because the Defect differentiated the P320 from the accepted quality and safety standards for new handguns.

82. Firearms experts confirm that the Defect is manifested in every P320 and the design is not a “potential defect.”

83. Thus, Sig Sauer failed to fulfill its bargain with consumers who agreed to purchase the P320 because those pistols were less valuable than what consumers reasonably expected to receive.

84. A uniform damages model equally applicable to all P320s—proffered and supported by an economist—will allow a jury to measure overpayment harm suffered by class members as a result of the alleged Defect.

IV. EQUITABLE TOLLING

85. The running of the statute of limitations is tolled due to equitable tolling. Sig Sauer is estopped from relying on any statutes of limitation or repose by virtue of its acts of fraudulent concealment, through affirmative misrepresentations and omissions to Plaintiff and putative class members of the P320’s Defect. Sig Sauer affirmatively withheld and misrepresented facts concerning the safety of the P320. As a result of Sig Sauer’s misrepresentations and concealment, Plaintiff and putative class members were unaware, and could not have known or have learned through reasonable diligence, of facts related to Sig Sauer’s misrepresentations or omissions, that the P320 was defective and that consumers were being harmed as a direct and proximate result of the wrongful acts and/or omissions of Sig Sauer.

86. Given Sig Sauer’s affirmative actions of concealment by failing to disclose this known but non-public information about the P320’s Defect—information over which Sig Sauer had exclusive control—and because Plaintiff and putative class members could not reasonably have known of the P320’s Defect, Sig Sauer is estopped from relying on any statutes of

limitations or repose that might otherwise be applicable to the claims asserted herein during the pendency of its concealment.

V. CLASS ALLEGATIONS

87. Plaintiff, on behalf of himself and the proposed Class, re-alleges the foregoing paragraphs as if fully set forth herein.

88. Plaintiff seeks to represent the following proposed Class:

All persons who purchased a Sig Sauer model P320 pistol without an external thumb safety in the state of Washington from November 17, 2021, through the present, in addition to any period of court-ordered equitable tolling.³

89. This action has been brought and may properly be maintained on behalf of the Class proposed above under the criteria of Federal Rule of Civil Procedure Rule 23.

90. **Numerosity**. Sig Sauer sold thousands of P320 firearms, including a substantial number in Washington. Members of the proposed Class likely number in the hundreds or thousands and are thus too numerous to practically join in a single action. Class members may be notified of the pendency of this action by mail, supplemented by published notice (if deemed necessary or appropriate by the Court).

91. **Commonality and Predominance**. Common questions of law and fact exist as to all members of the proposed Class and predominate over questions affecting only individual class members. These common questions include whether:

- whether the P320 contains the alleged Defect;

³ The following are excluded from the class: (1) individuals who have filed an individual action against Sig Sauer related to the P320; (2) individuals who no longer own a P320 pistol without an external thumb safety; (3) Sig Sauer, including any affiliate, parent, or subsidiary of Sig Sauer; (4) any judge to whom this case is assigned, his or her spouse, and all persons within the third degree of relationship to either of them, as well as the spouses of such persons; and (5) members of the judge's staff.

- whether Sig Sauer knew or should have known that the P320 contains the alleged Defect;
- whether the P320's alleged Defect makes it unreasonably dangerous for its reasonably anticipated use;
- whether Sig Sauer has a practice of failing to inform consumers of the P320's alleged Defect;
- whether Sig Sauer has a practice of failing to inform consumers that the P320 was of a different design than the military version of the pistol;
- whether Sig Sauer's practices are deceptive;
- whether Sig Sauer's practices are unfair;
- whether Sig Sauer's practices impact the public interest;
- whether Sig Sauer's practices occurred in the course of Sig Sauer's trade or commerce;
- whether Plaintiff and the Class are entitled to damages; and
- whether Plaintiff and the Class are entitled to injunctive relief.

The foregoing questions are common to the class because they will be answered by scrutinizing Sig Sauer's conduct in relation to the P320 rather than the conduct of the individual class members.

92. **Typicality**. Plaintiff's claims are typical of the claims of the proposed Class because he purchased the same firearm containing the same Defect in Washington within the class period; this similarity gives rise to substantially the same claims as the proposed Class.

93. **Adequacy**. Plaintiff is an adequate representative of the proposed Class because his interests do not conflict with the interests of the members of the Class that he seeks to represent. Plaintiff has retained counsel competent and experienced in complex class action litigation, and Plaintiff will prosecute this action vigorously on behalf of the proposed class. The interests of members of the class will be fairly and adequately protected by Plaintiff and his counsel.

1 94. **Superiority.** A class action is superior to other available means for the fair and
 2 efficient adjudication of this dispute. The injury suffered by each Class member, while
 3 meaningful on an individual basis, is not of such magnitude as to make the prosecution of
 4 individual actions against Sig Sauer economically feasible. Even if Class members themselves
 5 could afford such individualized litigation, the court system could not. In addition to the burden
 6 and expense of managing many actions arising from the P320 pistol's alleged Defect,
 7 individualized litigation presents a potential for inconsistent or contradictory judgments.
 8 Individualized litigation increases the delay and expense to all parties and the court system
 9 presented by the legal and factual issues of the case. By contrast, a class action presents far
 10 fewer management difficulties and provides the benefits of single adjudication, economy of
 11 scale, and comprehensive supervision by a single court.

12 95. In the alternative, the proposed Class may be certified because:

- 13 a. the prosecution of separate actions by the individual members of the
 14 proposed Class would create a risk of inconsistent or varying adjudication
 15 with respect to individual Class members which would establish
 16 incompatible standards of conduct for Sig Sauer;
- 17 b. the prosecution of separate actions by individual Class members would
 18 create a risk of adjudications with respect to them which would, as a
 19 practical matter, be dispositive of the interests of other Class members not
 20 parties to the adjudications, or substantially impair or impede their ability
 21 to protect their interests; and
- 22 c. Sig Sauer has acted or refused to act on grounds generally applicable to
 23 the proposed Class, thereby making appropriate final and injunctive relief
 24 with respect to the members of the proposed Class as a whole.

VI. VIOLATIONS OF THE WASHINGTON CONSUMER PROTECTION ACT

COUNT I

Violation of the CPA - Unfair Acts or Practices

Wash. Rev. Code §§ 19.86.10 *et seq.*

(Plaintiff Individually and on behalf of the proposed Class)

96. Plaintiff, on behalf of himself and the proposed Class, re-alleges the foregoing paragraphs as if fully set forth herein.

97. Under the Washington Consumer Protection Act (“the CPA”), a “person” is defined to include any “natural persons, corporations, trusts, unincorporated associations and partnerships.” Wash. Rev. Code § 19.86.010 (1). Plaintiff and the proposed Class members are all persons within the scope of the CPA.

98. Under the CPA, “Assets” is broadly defined to include “any property” or “any other thing of value.” The P320 is an asset within the scope of the CPA. Wash. Rev. Code § 19.86.10(3).

99. At all relevant times, Defendant engaged in “trade and commerce” through the sale of assets, namely the P320, and engaging in commerce that both directly and indirectly affected the people of the state of Washington, and thus, is capable of injuring a substantial portion of the public. *See* Wash. Rev. Code § 19.86.10(2).

100. The CPA provides that “Unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful.” Wash. Rev. Code § 19.86.20.

101. Defendant violated and continues to violate the CPA by engaging in unfair acts or practices by omitting material facts concerning the safety of the P320 while engaging in trade and commerce.

102. Defendant repeatedly advertised the P320 on its websites, through social media, podcasts, YouTube videos and related content, and national advertising campaign, but did not

disclose the Defect or the dangers associated with the Defect to Plaintiff or proposed Class members.

103. Furthermore, Sig Sauer touts that the military adopted the P320 as its service firearm—thereby giving the pistol credibility among gun enthusiasts—but omits that the military version of the firearm (the M17 and M18) contains several design modifications absent the consumer version of the pistol.

104. Defendant's conduct is immoral, unethical, oppressive, or unscrupulous because the failure to disclose such serious safety risks places consumers in serious danger.

105. Defendant's omissions concerning the safety of the P320 and the nature of the Defect impact the public interest because Sig Sauer is concealing from the public the dangerous nature of the P320. These omissions lead to and have caused serious personal injuries to consumers and have deceived a substantial portion of the Washington public.

106. Thus, Sig Sauer's conduct is injurious to the public interest because it has: (1) injured consumers; (2) had the capacity to injure other persons; and (3) currently has the capacity to injure other persons.

107. As a direct and proximate result of Sig Sauer's unfair acts and practices, Plaintiff and the proposed Class members have suffered an injury in fact and lost money. Had Sig Sauer disclosed the true quality and defective nature of the P320 firearm, Plaintiff and Class members would not have purchased them or would have paid substantially less for them.

108. Plaintiff and the proposed Class are therefore entitled to legal relief against Defendant, including the recovery of actual damages, treble damages, attorneys' fees, and costs of suit.

COUNT II

Violation of the CPA - Deceptive Acts or Practices

Wash. Rev. Code §§ 19.86.10 *et seq.*

(Plaintiff Individually and on behalf of the proposed Class)

109. Plaintiff, on behalf of himself and the proposed Class, re-alleges the foregoing paragraphs as if fully set forth herein.

110. The CPA provides that “Unfair methods of competition and unfair or deceptive acts or practices in the conduct of any trade or commerce are hereby declared unlawful.” Wash. Rev. Code § 19.86.20.

111. Defendant violated and continues to violate the CPA by engaging in deceptive acts or practices by omitting material facts concerning the safety of the P320 while engaging in trade and commerce. Defendant’s acts purposefully misrepresent the nature of the product.

112. Defendant repeatedly advertised the P320 on its websites, through social media, podcasts, YouTube videos and related content, and national advertising campaign, but Sig Sauer did not disclose the Defect or the dangers associated with the Defect to Plaintiff or proposed Class members.

113. Furthermore, Sig Sauer touts that the military adopted the P320 as its service firearm—thereby giving the pistol credibility among gun enthusiasts—but omits that the military version of the firearm (the M17 and M18) contains several design modifications absent the consumer version of the pistol.

114. Defendant’s omissions concerning the safety of the Defect were material because they were likely to deceive a reasonable consumer into purchasing a P320 without being aware of the dangerous nature of the Defect.

115. At the time that Sig Sauer designed, manufactured, and marketed the P320, it knew or should have known that the Defect posed serious safety risks to consumers like Plaintiff and the proposed Class members.

116. Nonetheless, Sig Sauer concealed its knowledge of the Defect from consumers, including Plaintiff and members of the proposed Class.

117. To this day, Sig Sauer continues to violate the CPA by concealing the Defect, by failing to issue a recall, by failing to notify customers of the serious safety issues posed by the Defect, and by failing to offer cost-free repair or replacement of the Defect.

118. These acts or practices are deceptive within the meaning of the CPA because they have the capacity to deceive Washington consumers.

119. At all relevant times, Defendant's deceptive conduct engaged in "trade and commerce" through the sale of assets, namely the P320, and engaging in commerce that both directly and indirectly affected the people of the state of Washington, and thus, is capable of injuring a substantial portion of the public. See Wash. Rev. Code § 19.86.10(2).

120. Defendant's omissions concerning the safety of the P320 and the nature of the Defect impact the public interest because Sig Sauer is concealing from the public the dangerous nature of the P320. These omissions lead to and have caused serious personal injuries to consumers and have deceived a substantial portion of the Washington public.

121. Thus, Sig Sauer's conduct is injurious to the public interest because it has: (1) injured consumers; (2) had the capacity to injure other persons; and (3) currently has the capacity to injure other persons.

122. Sig Sauer's deceptive acts and practices caused Plaintiff and the proposed Class members injuries and to suffer damages. Had Sig Sauer disclosed the true quality and defective nature of the P320 firearm, Plaintiff and Class members would not have purchased them or would have paid substantially less for them.

123. Plaintiff and the proposed Class are therefore entitled to legal relief against Defendant, including the recovery of actual damages, treble damages, attorneys' fees, and costs of suit.

COUNT III

Violation of the CPA - Injunctive Relief

Wash. Rev. Code §§ 19.86.10 *et seq.*

(Plaintiff Individually and on behalf of the proposed Class)

124. Plaintiff, on behalf of himself and the proposed Class, re-alleges the foregoing paragraphs as if fully set forth herein.

125. Under the CPA, "[a]ny person who is injured in his or her business or property" by a CPA violation "may bring a civil action in superior court to enjoin further violations." Wash. Rev. Code § 19.86.090.

126. For the reasons set forth above and incorporated herein, Defendant has violated the CPA, and Plaintiff and the proposed Class have been injured in their property by those violations. Thus, Plaintiff and the proposed Class have standing to seek an injunction to protect the public interest from future violations.

127. Therefore, Plaintiff seeks an injunction prohibiting Defendant from continuing its unfair and deceptive practices. Specifically, Plaintiff asks the Court to order Defendant to adequately disclose or repair the Defect.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Court enter a judgment awarding the following relief:

- A. An order certifying the proposed Class and appointing Plaintiff and his counsel to represent the Class;
- B. An order awarding Plaintiff and the Class members their actual damages, and/or any other form of monetary relief provided by and pursuant law;
- C. Treble damages suffered by Plaintiff and the proposed Class under Wash. Rev. Code § 19.86.090;
- D. An order requiring Sig Sauer to adequately disclose or repair the Defect;
- E. An order awarding Plaintiff and the Class pre-judgment and post-judgment interest as allowed under the law; and
- F. An order awarding Plaintiff and the Class reasonable attorneys' fees and costs of suit, including expert witness fees.

VIII. DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all claims so triable.

1 RESPECTFULLY SUBMITTED AND DATED this 17th day of November, 2025.

2 TERRELL MARSHALL LAW GROUP PLLC

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19 Facsimile: (816) 945-7118

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Counsel for Plaintiff and the Proposed Class

CIVIL COVER SHEET

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. 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. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

PATRICK SCHREIBER, on behalf of himself and all others similarly situated,

(b) County of Residence of First Listed Plaintiff Snohomish
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Amanda M. Steiner, Terrell Marshall Law Group PLLC
936 N 34th St Ste 300 Seattle, WA 98103 206-816-6603

DEFENDANTS

SIG SAUER, INC., a Delaware corporation,

County of Residence of First Listed Defendant Rockingham
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. § 1332(a)(1), 28 U.S.C. § 1332(d)

Brief description of cause:
Washington State Consumer Protection Act, RCW 19.86

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE

11/17/2025

SIGNATURE OF ATTORNEY OF RECORD

/s Amanda M. Steiner, WSBA #29147

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

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.
 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 statute.
- 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 cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

Western District of Washington

Defendant(s)

Civil Action No.

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____ , a person of suitable age and discretion who resides there,
 on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Sig Sauer P320 Pistols 'Extraordinarily Dangerous' Due to Defect, Class Action Says](#)
