

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

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

NO.

Plaintiff,

CLASS ACTION COMPLAINT

v.

JURY TRIAL DEMANDED

SIG SAUER, INC., a Delaware corporation,

Defendant.

This case concerns a defectively designed pistol, the Sig Sauer P320. Sig Sauer designed 20 without any external safety features, even though the pistol is effectively cocked (i.e., to fire) the moment a round is chambered. This is particularly galling because the P320 is among the lightest and shortest trigger pulls of any comparable pistol on the market. A practical effect is that when consumers carry a loaded P320, it is akin to the consumer carrying a loaded revolver, pulling the hammer back, and then walking around with that cocked 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*) 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

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

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

I. PARTIES

1. Plaintiff Patrick Schreiber is a citizen and resident of Washington.

2. Plaintiff purchased and currently owns a P320 without a manual safety.

3. Plaintiff purchased his P320 in Bothell, Washington beginning on November 21, 2021.

4. Plaintiff reviewed Sig Sauer's website prior to purchase and saw Sig Sauer's representations concerning the safety of the P320. Nowhere did Plaintiff see anything about the Defect.

5. Plaintiff purchased his P320 new and paid approximately \$1,093.82 for the pistol.

6. Sig Sauer, Inc. is a Delaware corporation with a principal place of business at 72 Pease Boulevard; Newington, New Hampshire 03801.

7. Sig Sauer designs, manufactures, and markets firearms, including the P320.

II. JURISDICTION AND VENUE

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

\$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.

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

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

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

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

13 **C. All P320s have the Defect.**

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

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

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

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

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

4 **E. Sig Sauer knew of the Defect.**

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

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

12 41. The risk assessment identified the P320 as having a "high" risk for having an
 13 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

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

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

		RISK ASSESSMENT MATRIX			
SEVERITY PROBABILITY		Catastrophic (1)	Critical (2)	Marginal (3)	Negligible (4)
1	2	3	4	5	6
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.

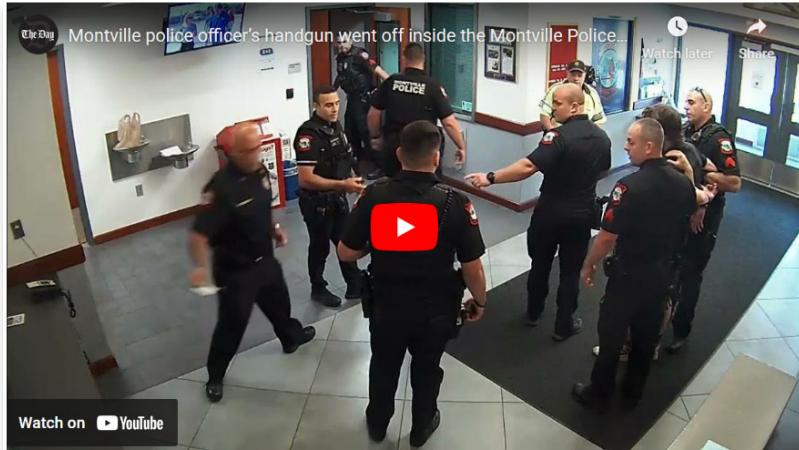
48. Several national news outlets—like ABC News and the Washington Post—have reported on consumers across the country who have been injured due to inadvertent discharges of the P320. *See, e.g., Detective sues Sig Sauer after she says her holstered P320*

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-killed/story?id=79605906>.
 3

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*:



21 (July 28, 2023) (accessed Oct. 7, 2025), available at <https://www.police1.com/police-products/firearms/articles/conn-police-department-to-replace-all-officers-handguns-due-to-safety-concerns-shVuKA0s4AlcvJze/>
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1 52. Sig Sauer dismisses these videos and news reports as “anti-gun” or perhaps
 2 fraudulent, even comparing them to videos of Bigfoot.

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

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8 **Statement 07/27**

9 **Option 1 (News):**

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

12 **Option 2 (Trial Lawyers)**

13 Once again, this lawsuit is a result of unsupported allegations and claims being
 14 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.

15 **Option 3: (GLOCK)**

16 We are not surprised that our competitor has decided to participate in sensationalizing
 17 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.

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

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

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

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

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

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

- 10 • **Chicago Police Department.** *Sig Sauer’s P320 banned by Chicago Police*
 11 *Department and other law enforcement agencies*, WE ARE THE MIGHTY (June 25,
 12 2025) (accessed Oct. 7, 2025), available at <https://www.yahoo.com/news/sig->
 13 [sauer-p320-banned-chicago-154300609.html](#).
- 14 • **Milwaukee, Wisconsin Police Department.** *Milwaukee Police to replace all officer*
 15 *weapons following ‘unexpected’ discharges*, Spectrum News 1 (Oct. 31, 2022)
 16 (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>.
- 17 • **Philadelphia Transit Police.** *Philadelphia Transit Police Scrap SIG Sauer Pistols After*
 18 *Incident*, New Hampshire Public Radio (September 11, 2019) (accessed Oct. 7,
 19 2025), available at <https://www.nhpr.org/post/philadelphia-transit-police-scrap-sig-sauer-pistols-after-incident>.
- 20 • **Ventura, California Police Department.** *Ventura Police Department Approves*
 21 *\$300k for Smith and Wesson M&P 2 Handgun Purchase*, Citizen Portal (Sept. 25,
 22 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>.

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

1 West Palm Beach (Dec. 4, 2023) (accessed Oct. 7, 2025), available at
 2 <https://www.wptv.com/news/treasure-coast/region-indian-river-county/indian->
 3 river-county-sheriffs-office-new-weapons-12-4-23.

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

12 59. And in November 2024, a CBS news outlet reported on—and published video
 13 footage of—an officer who was nearly killed when the P320 discharged in his holster while he
 14 was walking. *It happened again: Texas officer injured by holstered SIG SAUER P320*, CBS | Austin
 15 (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>

1 **G. Sig Sauer Doubles Down on the P320**

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

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

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

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

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

14 63. In March 2025, Sig Sauer launched a social media campaign across various
 15 platforms exclaiming, “THE TRUTH ABOUT THE P320,” and stating that, when it comes to the
 16 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:

SIG SAUER

The rhetoric is high, and we can no longer stay silent while lawsuits run their course, and clickbait farming, engagement hacking grifters continue their campaign to highjack the truth for profit. Enough is enough. From the courts of law to the court of public opinion we will combat the lies and misinformation with the truth. SIG SAUER stands behind the quality, safety, and design of all our products – especially the P320.

Industry, take notice; what's happening today to SIG SAUER with the anti-gun mob and their lawfare tactics will happen tomorrow at another firearms manufacturer, and then another. Today, for SIG SAUER - it ends.

43,231 likes

sigsauerinc The P320. It ends today.

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.).

1 67. To date, injured individuals have filed no fewer than 32 additional cases against
 2 Sig Sauer in federal courts across the country, alleging inadvertent discharge of the P320, with
 3 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

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

Personal Injury Suits Against Sig Sauer Concerning P320

Case Name ²	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.

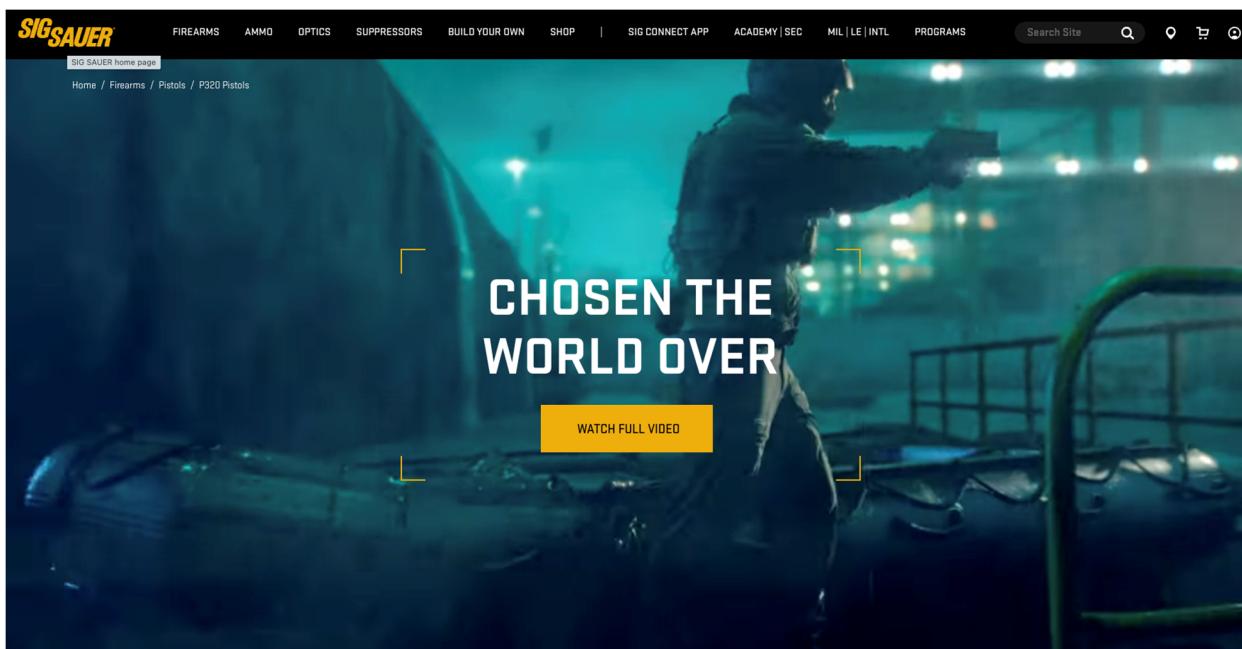
22 75. Even though Sig Sauer knows the P320 is harming individuals across the country,
 23 it has not made any design changes to the P320 in the last several years. Instead, Sig Sauer
 24 engages in the dissemination of counter-information in response to stories concerning
 25 inadvertent discharges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

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

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

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



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

25
 26 79. The following example demonstrates how Sig Sauer advertises the P320
 27 specifically—without reference to the M17 or M18—by depicting an individual in military

1 combat fatigues on the P320 landing page, with the statement that the P320 is “Chosen by all
 2 branches of the U.S. military”:

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TESTED AND ABUSED

With its unmatched modularity, unprecedented accuracy, and uncompromising reliability, the state-of-the-art SIG SAUER P320 has quickly become one of the most sought after firearms on the market today. Chosen by all branches of the U.S. military, as well as law enforcement agencies across the country and around the world, the P320 redefines the modern handgun.

SAFETY WITHOUT COMPROMISE

Safety isn't negotiable. The P320 maximizes peace of mind with a robust safety system including both a striker safety and a disconnect safety, and because of its innovative 3-point take-down safety, never again will you need to pull the trigger to disassemble your pistol.

VIDEO: The Safety Features of The P320

THE MOST TESTED AND PROVEN SIDEARM EVER

12 80. Another example is the following advertisement for the M17 specifically that
 13 states it is “BASED ON THE P320” while letting consumers know that the “M17 IS THE U.S.
 14 ARMY’S CHOICE,” and even displays the U.S. Army’s logo, but again completely omits that the
 15 Army-issued M17 includes a manual safety whereas the standard P320 does not:



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.

- 1 • whether Sig Sauer knew or should have known that the P320 contains the alleged
Defect;
- 2 • whether the P320's alleged Defect makes it unreasonably dangerous for its
reasonably anticipated use;
- 3 • whether Sig Sauer has a practice of failing to inform consumers of the P320's alleged
Defect;
- 4 • 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;
- 5 • whether Sig Sauer's practices are deceptive;
- 6 • whether Sig Sauer's practices are unfair;
- 7 • whether Sig Sauer's practices impact the public interest;
- 8 • whether Sig Sauer's practices occurred in the course of Sig Sauer's trade or commerce;
- 9 • whether Plaintiff and the Class are entitled to damages; and
- 10 • whether Plaintiff and the Class are entitled to injunctive relief.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

26 118. These acts or practices are deceptive within the meaning of the CPA because
 27 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 to 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.

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

TERRELL MARSHALL LAW GROUP PLLC

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Counsel for Plaintiff and the Proposed Class

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)

<input type="checkbox"/> 1 U.S. Government Plaintiff	<input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)
<input type="checkbox"/> 2 U.S. Government Defendant	<input checked="" type="checkbox"/> 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)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Product Liability	INTELLECTUAL PROPERTY RIGHTS	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	PERSONAL PROPERTY	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 385 Property Damage	SOCIAL SECURITY	<input type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 386 Product Liability	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
			<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input checked="" type="checkbox"/> 890 Other Statutory Actions
			<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 891 Agricultural Acts
			<input type="checkbox"/> 865 RSI (405(g))	<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	CIVIL RIGHTS	PRISONER PETITIONS		
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	Habeas Corpus:	<input type="checkbox"/> 791 Employee Retirement Income Security Act	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 463 Alien Detainee		
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 510 Motions to Vacate Sentence		
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 530 General		
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 535 Death Penalty	IMMIGRATION	
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	Other:	<input type="checkbox"/> 462 Naturalization Application	
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 465 Other Immigration Actions	
		<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)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another District (specify)	<input type="checkbox"/> 6 Multidistrict Litigation - Transfer	<input type="checkbox"/> 8 Multidistrict Litigation - Direct File
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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)

VI. CAUSE OF ACTION

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

SIGNATURE OF ATTORNEY OF RECORD

11/17/2025

/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.

UNITED STATES DISTRICT COURT
for the
Western District of Washington

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

Plaintiff(s))
v.) Civil Action No.
SIG SAUER, INC., a Delaware corporation,)

Defendant(s))

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* SIG SAUER, INC.,
c/o Registered Agent
Cogency Global Inc.
850 New Burton Road, Suite 201
Dover, DE 19904

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Amanda M. Steiner, WSBA #29147

Email: asteiner@terrellmarshall.com
Terrell Marshall Law Group PLLC
936 N. 34th Street, Suite 300
Seattle, Washington 98103
206-816-6603

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

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](#)
