

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
NORTHERN DIVISION

JAMES HAYES,)	
)	
Plaintiff,)	
)	
v.)	Case No.
)	
SENSIO INC.,)	
d/b/a MADE BY GATHER,)	
CRUX KITCHEN LLC, and,)	
8479950 CANADA INC.)	
)	
Defendants.)	

COMPLAINT AND JURY DEMAND

Plaintiff, James Hayes, by and through his attorneys, as and for his Complaint against Defendants Sensio Inc., Crux Kitchen LLC, and 8479950 Canada Inc, respectfully alleges as follows:

NATURE OF THE CASE

1. This is a Complaint for damages arising from injuries sustained by Plaintiff James Hayes due to a defective CRUX brand electric Pressure Cooker product that was manufactured, imported, marketed, and sold by Defendants Sensio Inc., Crux Kitchen LLC, and 8479950 Canada Inc.
2. Defendant Sensio does business as Made By Gather.
3. Defendant Sensio is or was the importer and distributor of the Crux brand pressure cooker that is the subject of this civil action.

4. Defendants Crux Kitchen LLC, and 8479950 Canada Inc., are or were the owners of the Crux brand.

5. On or about December 1, 2020, in Columbia, Missouri, Plaintiff James Hayes was using a Crux 8-Qt 10-In-1 Programmable Multi Cooker, Model No. M-80830BG, Item No. 14721, when the lid of the pressure cooker opened while the product was under pressure, causing the scalding hot contents to erupt from the pot.

6. Plaintiff sustained severe burns to his face, torso, and arms, causing extreme pain, suffering, and permanent disfigurement.

7. Plaintiff seeks compensatory damages for strict products liability, failure to warn, negligence, breach of warranty, and violations of Missouri consumer protection laws.

8. Plaintiff further alleges that Defendants knew or should have known of the product's defects and failed to take appropriate action to protect consumers, thereby demonstrating a willful and reckless disregard for consumer safety.

PARTIES

9. Plaintiff James Hayes is a citizen of the state of Missouri, residing and domiciled in Columbia, Missouri.

10. Defendant Sensio Inc. is a corporation organized under the laws of the state of Delaware, with its principal place of business located at 261 Madison Avenue, 25th Floor, New York, New York 10016.

11. Defendant Sensio Inc. does business in the state of Missouri and is engaged in the design, manufacture, distribution, and sale of consumer products, including the Crux 8-Qt Electric Pressure Cooker, Model No. M-60B23G, which is the product at issue in this case.

12. Defendant Sensio Inc. conducts substantial business in the state of Missouri, including marketing, distributing, and selling its products to Missouri residents, and is subject to the jurisdiction of this Court.

13. Defendant Sensio Inc. conducts business in the state of Missouri in part by entering in agreements with various retailers, including JCPenney, Kohl's, Lowe's, Macy's and Target stores nationwide, and online at Amazon.com and other websites, knowing that those retailers and selling platforms will sell Sensio products to consumers in the state of Missouri.

14. Defendant Crux Kitchen LLC. is a Limited Liability Company under the laws of the state of Delaware, with its principal place of business located at 261 Madison Avenue, 25th Floor, New York, New York 10016, the same address as Defendant Sensio Inc..

15. Upon information and belief, defendants Crux Kitchen LLC, and 8479950 Canada Inc. are not registered to do business in the state of Missouri.

16. Upon information and belief defendants Crux Kitchen LLC, and 8479950 Canada Inc. did business in the state of Missouri in part by entering in agreements with Sensio Inc. knowing that Sensio would distribute Crux products to consumers in the state of Missouri

JURISDICTION AND VENUE

17. This Court has subject matter jurisdiction under 28 U.S.C. § 1332(a) because the matter in controversy exceeds \$75,000, exclusive of interest and costs, and there is complete diversity of citizenship between the parties.

18. Venue is proper in this District under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claim occurred in this District, specifically in Columbia, Missouri, where the incident involving the Crux 8-Qt Electric Pressure Cooker occurred.

FACTUAL ALLEGATIONS

19. The product at issue is the Crux 8-Qt Electric Pressure Cooker, Item No. 14721, which was designed, manufactured, imported, marketed, distributed, and sold by Defendants.

20. The Crux 8-Qt Electric Pressure Cooker is marketed as a safe and reliable kitchen appliance intended for use in cooking food under pressure. The product is advertised as incorporating safety features, including an “auto-locking lid” that purportedly prevents the lid from opening while the cooker is pressurized.

21. The product is intended for consumer use in a domestic setting and is represented as being safe when used in accordance with the manufacturer’s instructions.

22. On or about December 1, 2020, Plaintiff James Hayes was using the Crux 8-Qt Electric Pressure Cooker at his residence in Columbia, Missouri.

23. While the pressure cooker was in normal and foreseeable use, the lid of the cooker unexpectedly detached while its contents were still under pressure. This malfunction caused scalding hot liquid and steam to erupt from the product.

24. As a direct result of this incident, Plaintiff sustained severe burns to his face, torso, and arms, causing extreme pain and suffering, and permanent scarring and disfigurement.

25. The Crux 8-Qt Electric Pressure Cooker was defectively designed and/or manufactured, creating an unreasonable risk of harm to consumers. Specifically, the product’s lid was capable of spontaneously detaching while the product is pressurized, allowing the sudden and dangerous release of its super-heated and scalding contents.

26. The product failed to meet applicable safety standards, including but not limited to UL 136 Standard for Safety, Pressure Cookers, approved by ANSI as ANSI/UL 136-2010. The product lacked adequate safety mechanisms to prevent the lid from opening under pressure.

27. Defendants failed to include adequate warnings or instructions regarding the risks associated with the product. The product's marketing materials and user manual did not sufficiently warn consumers of the potential for the lid to open prematurely or the associated risks of severe burns.

28. Defendants knew or should have known of the defects in the Crux 8-Qt Electric Pressure Cooker and the risks posed to consumers. Prior to the incident involving Plaintiff, Defendant was aware of similar incidents in which the product's lid opened under pressure, causing injuries.

29. Despite this knowledge, Defendants failed to take reasonable steps to remedy the defects or to warn consumers of the risks. Defendants continued to market and sell the product without implementing necessary design changes or issuing adequate warnings.

30. Defendants acted with reckless disregard for the safety of consumers by knowingly placing a defective and unreasonably dangerous product into the stream of commerce.

SENSIO INC.

31. Sensio Inc. is a closely held family corporation and has no parent, subsidiary and/or affiliate that has issued shares or debt securities to the public.

32. Sensio Inc. was founded in 2003 by Shae Hong, the current CEO, and his then-business partner, Dany Lavy.

33. Led by the Company's Chief Executive Officer ("CEO") and now majority owner Shae Hong ("Hong"), from its founding in 2003 through the present, Sensio has emerged as a major designer, distributor and manufacturer of small kitchen appliances sold in major retailers.

34. Sensio's business consists primarily of the development, manufacture, distribution, sale, and promotion of branded and non-branded small kitchen appliances in retail and commercial

distribution channels, with other products such as home products, cookware, table-top kitchen appliances, cutlery and cutting boards, diffusers, oils, air purifiers and sound machines, as emerging businesses for the Company.

35. Sensio distributes its products under various brand names, including certain private labels, including “Crux”, and primarily sells its products through various outlets, including well-known retailers, department stores, big box stores and online.

36. Sensio Inc. does business under the registered Trademark, “Made By Gather™”.

37. Defendant Sensio, Inc., d/b/a Made by Gather™, has over 100 employees across New York City, Montreal, Hong Kong, and China.

DEFENDANT CRUX KITCHEN LLC

38. Defendant Crux Kitchen LLC is the owner of the CRUX trademark.

39. The business address of Crux Kitchen, LLC is the same as Sensio Inc.

40. Upon information and belief Crux Kitchen LLC is owned and/or controlled by Sensio Inc., or the principals or owners of Sensio Inc.

STANDARDS FOR PRESSURE COOKER SAFETY

41. UL [f/k/a Underwriter’s Laboratories] is an industry supported business, that among other things, provides testing and engineering services to manufacturers. Its testing and certification services assist its customers to meet regulatory requirements and consumer demand for safe, trustworthy products.

42. Most retailers in the United States require that electrical appliance products they sell be UL Certified or have the equivalent of a UL Certification.

43. The applicable industry standard for safety of pressure cookers is found in UL 136 Standard for Safety, Pressure Cookers.

44. The American National Standard Institute [ANSI] oversees standards and conformity assessment activities in the United States.

45. ANSI's mission is to enhance both the global competitiveness of U.S. business and the U.S. quality of life by promoting and facilitating voluntary consensus standards and conformity assessment systems and safeguarding their integrity.

46. ANSI has approved UL 136 Standard for Safety, Pressure Cookers as ASNI/UL 136-2010.

47. UL 136 Standard for Safety, Pressure Cookers, provides, in part:

4.3 The cover shall be constructed to comply with one of the following:

- a) When the cover is opened the maximum normal operating pressure shall be released before the fastening means is fully disengaged;
- b) The cover shall be removable only after the pressure within the cooker is zero (0) psig; or
- c) The opening of the cover when the cooker is under pressure shall not result in hazardous displacement of the cover or the displacement of steam or water.

48. UL 136 Standard for Safety, Pressure Cookers, also provides, in part:

9.1 An ordinary user shall not be capable of manually defeating the holding action of the clamping device when the pressure in the cooker reaches a value that creates a risk of injury to persons. The propelling of a loosened cover and the escape of steam or hot water are examples of this risk.

49. Industry standards for safety of pressure cookers require that the subject Crux 8-Qt Electric Pressure Cooker comply with ASNI/UL 136-2010, i.e., UL 136 Standard for Safety, Pressure Cookers.

50. The Crux 8-Qt Electric Pressure Cooker was not certified to comply with UL 136 Standard for Safety, Pressure Cookers.

51. Defendants did not require that its Crux 8-Qt Electric Pressure Cooker comply with UL 136 Standard for Safety, Pressure Cookers.

52. Defendants did not submit its Crux 8-Qt Electric Pressure Cooker to Underwriters Laboratories for certification pursuant to UL 136 Standard for Safety, Pressure Cookers.

53. Prior to the sale of the subject Crux 8-Qt Electric Pressure Cooker Defendants knew or should have known that its Crux 8-Qt Electric Pressure Cookers did not comply with ASNI/UL 136-2010, i.e., UL 136 Standard for Safety, Pressure Cookers.

SUBJECT CRUX 8-QT ELECTRIC PRESSURE COOKER

54. The Crux 8-Qt Electric Pressure Cooker, that is the subject of this civil action is a Model No. M-80830BG, Item No. 14721.

55. Defendants designed the Crux 8-Qt Electric Pressure Cooker involved in the incident that is the subject of this civil action.

56. Defendants manufactured the Crux 8-Qt Electric Pressure Cooker involved in the incident that is the subject of this civil action, or had it manufactured for it under a contract or supply agreement with a third party that is not subject to the jurisdiction of this court.

57. Defendant Sensio imported the Crux 8-Qt Electric Pressure Cooker involved in the incident that is the subject of this civil action.

58. Defendants marketed the Crux 8-Qt Electric Pressure Cooker involved in the incident that is the subject of this civil action.

59. Defendant Sensio imported to the United States the Crux 8-Qt Electric Pressure Cooker that is the subject of this civil action, or had it imported to the United States for it under a contract or supply agreement with a third party that is not subject to the jurisdiction of this court and that had no role in the design or manufacture of the product.

60. Defendant Sensio marketed the Crux 8-Qt Electric Pressure Cooker involved in the incident that is the subject of this civil action.

61. Defendant Sensio distributed the Crux 8-Qt Electric Pressure Cooker involved in the incident that is the subject of this civil action, or had it distributed for it under a contract or supply agreement with a third party that is not subject to the jurisdiction of this court.

62. Defendants sold the Crux 8-Qt Electric Pressure Cooker involved in the incident that is the subject of this civil action, or had it sold for it under a contract or supply agreement with a third party that had no role in the design or manufacture of the product.

63. Defendant Sensio was a nonmanufacturing entity in the chain of distribution of the Crux 8-Qt Electric Pressure Cooker involved in the incident that is the subject of this civil action.

64. Prior to the sale of the subject Crux 8-Qt Electric Pressure Cooker Defendants knew that the lid of the Crux 8-Qt Electric Pressure Cooker could be opened while the cooker's contents were under pressure.

65. The subject Crux 8-Qt Electric Pressure Cooker did not comply with the requirements of UL 136 Standard for Safety, Pressure Cookers.

66. Prior to the sale of the subject Crux 8-Qt Electric Pressure Cooker Defendants knew or should have known that its Crux 8-Qt Electric Pressure Cookers did not comply with UL 136 Standard for Safety, Pressure Cookers.

67. Prior to the sale of the subject Crux 8-Qt Electric Pressure Cooker Defendants knew that the lid of the Crux Electric Pressure Cooker did not comply with industry standards for the safety of pressure cookers.

68. Prior to the sale of the subject Crux 8-Qt Electric Pressure Cooker Defendants knew that users of this product had been seriously injured by the lid of the Crux Electric Pressure Cooker opening while the cooker's contents were under pressure.

69. Prior to the sale of the subject Crux 8-Qt Electric Pressure Cooker Defendants did not stop the distribution or sale of the Crux Electric Pressure Cooker.

70. Prior to December 1, 2020, Defendants knew that the lid of the Crux 8-Qt Electric Pressure Cooker did not comply with the requirements of UL 136.

71. Prior to December 1, 2020, Defendants knew that the lid of the Crux 8-Qt Electric Pressure Cooker did not comply with industry standards for the safety of pressure cookers.

72. Prior to December 1, 2020, Defendants knew that users of this product, the Crux 8-Qt Electric Pressure Cooker, had been seriously injured by the lid of the Crux 8-Qt Electric Pressure Cooker opening while the cooker's contents were under pressure.

73. Prior to December 1, 2020, Defendants did not warn consumers that the lid of the Crux 8-Qt Electric Pressure Cooker may open while the cooker's contents were under pressure.

74. Prior to December 1, 2020, Defendants did not recall the Crux 8-Qt Electric Pressure Cooker because it knew that the lid may open while the cooker's contents were under pressure.

75. Prior to the manufacture of the Crux 8-Qt Electric Pressure Cooker, safer alternative designs for the lid locking system and safety features were feasible, and in fact existed in the pressure cooker products of Sensio's competitors.

76. Prior to the manufacture of the Sensio Pressure Cookers, safer alternative designs for the lid locking system and safety features were feasible, and in fact existed in the pressure cooker products of Sensio's competitors.

77. Prior to the manufacture of the Crux 8-Qt Electric Pressure Cooker, Sensio chose not to incorporate into the design and manufacture of its Crux 8-Qt Electric Pressure Cooker available safer alternative designs for the lid locking system and safety features.

78. Prior to the manufacture of the Sensio Pressure Cookers, Sensio chose not to incorporate into the design and manufacture of its Crux 8-Qt Electric Pressure Cooker available safer alternative designs for the lid locking system and safety features.

79. Prior to the manufacture of the subject Crux 8-Qt Electric Pressure Cooker safer alternative designs for the lid locking system and safety features were feasible, and in fact existed in the pressure cooker products of Sensio's competitors.

80. Prior to the manufacture of the subject Crux 8-Qt Electric Pressure Cooker Sensio chose not to incorporate into the design and manufacture of its Crux 8-Qt Electric Pressure Cooker available safer alternative designs for the lid locking system and safety features.

81. By 2018, Sensio was receiving notice from users of the defect and continued to receive notice that the lid of the Products were opening while their contents were under pressure, the super-heated contents of the Product erupted from the pot, and caused serious burn injuries to the user of the Product.

82. On August 10, 2023, the Consumer Products Safety Commission ("CPSC") announced a recall of more than 860,000 of Defendant's pressure cookers, which includes the subject pressure cooker, after receiving "63 reports of incidents, including 61 burn injuries, some of which involved second and third degree burns to the face, torso, arms, and hands."¹

¹ See <https://www.cpsc.gov/Recalls/2023/Sensio-Recalls-Bella-Bella-Pro-Series-Cooks-and-Crux-Electric-and-Stovetop-Pressure-Cookers-Due-to-Burn-Hazard> (May 13, 2025)

83. Defendants knew or should have known of these defects but have nevertheless put profit ahead of safety by continuing to sell its pressure cookers to consumers, failing to warn said consumers of the serious risks posed by the defects, and failing to timely recall the dangerously defective pressure cookers regardless of the risk of significant injuries to Plaintiff and consumers like him.

84. Defendants ignored and/or concealed its knowledge of these defects in its pressure cookers from Plaintiff, as well as the public in general, in order to continue generating a profit from the sale of said pressure cookers, demonstrating a callous, reckless, willful, depraved indifference to the health, safety and welfare of Plaintiff and others like him.

85. As a direct and proximate result of Defendants' conduct, Plaintiff incurred significant and painful bodily injuries, physical pain, mental anguish, and diminished enjoyment of life.

DECEMBER 1, 2020 INCIDENT

86. On December 1, 2020, Plaintiff James Hayes was using the subject Crux 8-Qt Electric Pressure Cooker as intended in a foreseeable manner.

87. On December 1, 2020, Plaintiff James Hayes was using the subject Crux 8-Qt Electric Pressure Cooker, when the lid of the Crux Electric Pressure Cooker opened while the cooker's contents were under pressure.

88. On December 1, 2020, Plaintiff James Hayes was using the subject Crux 8-Qt Electric Pressure Cooker, for the purpose and in the manner normally intended.

89. On December 1, 2020, Plaintiff James Hayes was using the subject Crux 8-Qt Electric Pressure Cooker, when the lid opened while the product was pressurized.

90. On December 1, 2020, when Plaintiff James Hayes was using the subject Crux 8-Qt Electric Pressure Cooker, the cover was removable before the pressure within the cooker was zero (0) psig, or otherwise low enough that the scalding contents would not erupt from the pot as the lid opened.

91. On December 1, 2020, Plaintiff James Hayes was using the subject Crux 8-Qt Electric Pressure Cooker, when the opening of the lid resulted in eruption of the scalding contents of the pot.

92. On December 1, 2020, an ordinary user of the subject Crux 8-Qt Electric Pressure Cooker was capable of manually defeating the holding action of the clamping device when the pressure in the cooker was such that it created a risk of injury to persons.

93. On December 1, 2020, due to a defect in its design, manufacture and/or warnings, the lid of the Crux 8-Qt Electric Pressure Cooker opened while the cooker's contents were under pressure.

94. On December 1, 2020, as the lid of the Crux 8-Qt Electric Pressure Cooker opened, its super-heated contents and steam erupted from the pressure cooker, resulting in severe burns to Plaintiff James Hayes's face, chest, abdomen, and arms.

FIRST CAUSE OF ACTION

STRICT PRODUCTS LIABILITY

95. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

96. The subject Crux 8-Qt Electric Pressure Cooker was in a defective and unreasonably dangerous condition when it left Defendants control.

97. The product was defectively designed and/or manufactured, creating an unreasonable risk of harm to consumers. Specifically, the product's lid was capable of opening while the cooker was still pressurized, allowing the sudden and dangerous release of scalding steam and liquid.

98. The product failed to meet applicable safety standards, including but not limited to UL 136 Standard for Safety, Pressure Cookers, approved by ANSI as ANSI/UL 136-2010. The product lacked adequate safety mechanisms to prevent the lid from opening under pressure.

99. As a direct and proximate result of the defective and unreasonably dangerous condition of the product, Plaintiff James Hayes sustained severe burns to his face, torso, and causing permanent disfigurement, and resulting in significant pain and suffering.

SECOND CAUSE OF ACTION

FAILURE TO WARN

100. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

101. Defendants failed to provide adequate warnings or instructions regarding the risks associated with the Crux 8-Qt Electric Pressure Cooker, including the risk that the lid could open while the cooker was still pressurized, causing the release of scalding contents, steam and liquid.

102. The product's marketing materials and user manual did not sufficiently warn consumers of the potential for the lid to open prematurely or the associated risks of severe burns.

103. Defendants knew or should have known of the risks associated with the product but failed to take reasonable steps to warn consumers of these dangers.

104. As a direct and proximate result of Defendants' failure to warn, Plaintiff James Hayes sustained severe burns to his face, torso, and arms causing permanent disfigurement, and resulting in significant pain and suffering.

THIRD CAUSE OF ACTION

NEGLIGENCE

105. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

106. Defendants owed a duty of care to design, manufacture, and sell a safe product, including the Crux 8-Qt Electric Pressure Cooker.

107. Defendants breached this duty by negligently designing, manufacturing, and selling the product, including but not limited to:

- a. Failing to design the product with adequate safety mechanisms to prevent the lid from opening while under pressure;
- b. Failing to manufacture the product in compliance with applicable safety standards; and,
- c. Failing to provide adequate warnings or instructions regarding the risks associated with the product.

108. Defendants' negligence was a direct and proximate cause of Plaintiff James Hayes's injuries, including severe burns to his face torso, and arms, causing permanent disfigurement, and resulting in significant pain and suffering.

WILLFUL, WANTON, AND IN RECKLESS CONDUCT

109. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

110. Defendants' conduct was willful, wanton, and in reckless disregard for the safety of consumers, including Plaintiff James Hayes.

111. Defendants knew or should have known of the defects in the Crux 8-Qt Electric Pressure Cooker and the risks posed to consumers but continued to manufacture, market, and sell the product without taking reasonable steps to remedy the defects or to warn consumers of the risks.

DAMAGES

112. As a direct and proximate result of the actions, conduct, and failure to act, of Defendants, described above, Plaintiff James Hayes suffered serious personal injuries and damages, including medical expenses, physical pain and suffering, mental pain, suffering and anguish, and permanent disfigurement, which total more than \$75,000, exclusive of interest and costs.

113. Plaintiff James Hayes's injuries and disfigurement are permanent.

WHEREFORE, Plaintiff James Hayes respectfully requests that this Court enter judgment in his favor and against Defendants Sensio Inc., Crux Kitchen LLC, and 8479950 Canada Inc., and award the following relief:

- a. Compensatory damages in an amount to be determined at trial, but in excess of \$75,000, exclusive of interest and costs, including but not limited to damages for past medical expenses, pain and suffering, emotional distress, mental anguish, and permanent disfigurement;
- b. Costs of suit, including reasonable attorney's fees, as may be allowed by Missouri law;

- c. Pre-judgment interest as allowed by Missouri law;
- d. Post-judgment interest as allowed by Missouri law;
- e. All taxable courts cost; and,
- f. Such other damages and further relief as supported by the evidence and the Court deems just and proper.

JURY DEMAND

Plaintiff James Hayes demands a trial by jury on all issues so triable.

Respectfully submitted on this 1st day of December 2025.

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Attorneys for Plaintiff

JS 44 (Rev 09/10)

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

CIVIL COVER SHEET

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Western District of Missouri.

The completed cover sheet must be saved as a pdf document and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff(s):**First Listed Plaintiff:**

James Hayes ;
1 Citizen of This State;
County of Residence: Boone County

Defendant(s):**First Listed Defendant:**

Sensio Inc. ;
5 Incorporated and Principal Place of Business in Another State; New York
County of Residence: Outside This District

Additional Defendants(s):

Crux Kitchen LLC ;
5 Incorporated and Principal Place of Business in Another State; New York

8479950 Canada ;
3 Citizen of Foreign Country;

County Where Claim For Relief Arose: Boone County

Plaintiff's Attorney(s):

Jill Harper (James Hayes)

401 Locust Street, Ste. 401
Columbia, Missouri 65201

Phone: 573-442-1660

Fax:

Email: jharper@lawmissouri.com

Defendant's Attorney(s):

Basis of Jurisdiction: 4. Diversity of Citizenship

Citizenship of Principal Parties (Diversity Cases Only)

Plaintiff: 1 Citizen of This State

Defendant: 5 Incorporated and Principal Place of Business in Another State

Origin: 1. Original Proceeding

Nature of Suit: 365 Other Personal Injury Product Liability

Cause of Action: Defective pressure cooker.

Requested in Complaint

Class Action: Not filed as a Class Action

Monetary Demand (in Thousands):

Jury Demand: Yes

Related Cases: Is NOT a refiling of a previously dismissed action

Signature: /s/ Jill Harper

Date: 12/01/2025

If any of this information is incorrect, please close this window and go back to the Civil Cover Sheet Input form to make the correction and generate the updated JS44. Once corrected, print this form, sign and date it, and submit it with your new civil action.