

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

EDITH LOPEZ , an individual,	:	
	:	
Plaintiff,	:	Civil Action No.:
	:	
v.	:	
	:	
SENSIO, INC. d/b/a BELLA ,	:	
a Canadian Corporation,	:	
	:	
Defendant.	:	

COMPLAINT

Plaintiff, **EDITH LOPEZ** (“Plaintiff”) by and through her undersigned counsel, **JOHNSON BECKER, PLLC** and **MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC**, hereby submits the following Complaint and Demand for Jury Trial against Defendant **SENSIO, INC. d/b/a BELLA**, alleges the following upon personal knowledge and belief, and investigation of counsel:

NATURE OF THE CASE

1. Defendant Bella designs, manufactures, markets, imports, distributes and sells consumer kitchen products, including the subject “Bella 5qt Pressure Cooker,” which specifically includes the Model Number JY-PC20US-5P (referred to hereafter as “pressure cooker(s)”) that is at issue in this case.

2. Defendant Bella boasts that it’s pressure cookers feature an “[e]xtremely safe and secure locking system”¹ or “safety valve” which creates “added safety and control” and allows the consumer to “cook a variety of foods.”² Despite Defendant’s claims of “safety,” it designed, manufactured, marketed, imported, distributed and sold, both directly and through third-party

¹ See <https://bellahousewares.com/products-bella/5qt-pressure-cooker/> (last accessed November 1, 2020).

² *Id.*

Join the hundreds of people holding manufacturers accountable for defective and unsafe pressure cookers by asserting your pressure cooker personal injury claim.

Pressure cooker manufacturers market their products as a quick, healthy and safe way to cook. However, the reality is that many of the pressure cookers on the market have serious design flaws that can lead to severe malfunctions. These malfunctions can cause steam and scalding hot liquids and food to explode out of the pressure cooker, burning the user and anyone nearby.

The pressure cooker litigation team at Johnson Becker is experienced at holding manufacturers responsible for defective products. Over the last four years, Johnson Becker has represented over 500 people in more than 40 states who have been burned by exploding pressure cookers. In addition, we have handled pressure cooker cases against virtually all of the major name-brand manufacturers.

Each pressure cooker lawsuit is dependent on its own unique facts, but our firm continues to successfully file lawsuits against the manufacturers of defective pressure cookers and obtain settlements for our clients. We believe that holding manufacturers responsible for our clients' injuries not only helps our clients, but prevents future injuries by forcing manufacturers to evaluate and improve the safety of their products.

What Our Clients Say About Us . . .

“Johnson Becker was so helpful and easy to work with. They were always immediately available to answer my questions and they kept me up to date every step of the way. All the staff were extremely compassionate and professional. If you need a firm to handle your litigation, I highly recommend Johnson Becker.” -*Sandy F.*

“My experience with Johnson and Becker especially working with Mr Adam and Mr Mike has been beyond explainable. They are an amazing team. Mr Adam has been in touch with me throughout the whole process, never left me wondering. This law firm has worked with me to get the best results and ... everything they said they would do, they did it. I would highly recommend them to anyone who needs a great law firm.” -*Brenika L.*

“The service we received from Adam Kress and his team was outstanding. We came away feeling like we had a new friend. Our biggest surprise was that this company not only works on getting money for their clients, they actually care about getting unsafe products off the market. Thanks Johnson and Becker for making us feel like we helped make the world a little safer!” -*Ken C.*

Meet Our Pressure Cooker Attorneys:

Combined, they have over 55 years of experience holding manufacturers accountable when they choose to put profits over safety.

Michael Johnson

is a founding partner of Johnson Becker and the Co-Chair of its Consumer Products and Mass Tort Departments. Michael exclusively represents individuals across the country injured by defective and dangerous products, with an emphasis on consumer goods. Michael has battled major product manufacturers at trial, in the appellate courts, and all the way to the U.S. Supreme Court.



Kenneth Pearson

is a partner at Johnson Becker. A graduate of Harvard Law School, Ken began his career representing product manufacturers. He now draws on that experience to exclusively represent individuals seeking recovery for product-related personal injuries in state and federal courts nationwide.



Adam Kress

began his career at Johnson Becker in 2013, and has exclusively represented plaintiffs in product liability, personal injury and wrongful death claims. Adam co-chairs the firm's Consumer Products Department.



retailers, a product that suffers from serious and dangerous defects. Said defects cause significant risk of bodily harm and injury to its consumers.

3. Specifically, said defects manifest themselves when, despite Defendant's statements, the lid of the pressure cooker is removable with built-up pressure, heat and steam still inside the unit. When the lid is removed under such circumstances, the pressure trapped within the unit causes the scalding hot contents to be projected from the unit and into the surrounding area, including onto the unsuspecting consumers, their families and other bystanders. The Plaintiff in this case was able to remove the lid while the pressure cooker retained pressure, causing her serious and substantial bodily injuries and damages.

4. Defendant knew or should have known of these defects, but has 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 recall the dangerously defective pressure cookers regardless of the risk of significant injuries to Plaintiff and consumers like her.

5. As a direct and proximate result of Defendant Bella's conduct, the Plaintiff in this case incurred significant and painful bodily injuries, medical expenses, physical pain, mental anguish, and diminished enjoyment of life.

PLAINTIFF EDITH LOPEZ

6. Plaintiff is a resident and citizen of the city of Clifton, County of Passaic, State of New Jersey.

7. On or about June 5, 2020, Plaintiff suffered serious and substantial burn injuries as the direct and proximate result of the pressure cooker's lid being able to be rotated and opened while the pressure cooker was still under pressure, during the normal, directed use of the pressure cooker, allowing its scalding hot contents to be forcefully ejected from the pressure cooker and

onto Plaintiff. The incident occurred as a result of the failure of the pressure cooker's supposed "safety valve,"³ which purports to keep the consumer safe while using the pressure cooker. In addition, the incident occurred as the result of Defendant's failure to redesign the pressure cooker, despite the existence of economical, safer alternative designs.

DEFENDANT SENSIO, INC. d/b/a BELLA

8. Defendant Bella designs, manufactures, markets, imports, distributes and sells a variety of consumer kitchen products including pressure cookers, juicers, coffee makers, and air-fryers, amongst others.

9. Defendant Bella is a Canadian Corporation, with a principal place of business located at 610 East River Road, STE 260, New Glasgow, Nova Scotia B2H 3S2.

JURISDICTION AND VENUE

10. This Court has subject matter jurisdiction over this case pursuant to diversity jurisdiction prescribed by 28 U.S.C. § 1332 because the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and there is complete diversity between the parties.

11. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391 because Defendant has sufficient minimum contacts with the New Jersey and intentionally availed itself of the markets within New Jersey through the promotion, sale, marketing, and distribution of its products.

³ See generally Bella 5qt Pressure Cooker Model No. JY-PC20US-5P Owner's Manual, attached hereto as Exhibit A and incorporated by reference.

FACTUAL BACKGROUND

12. Defendant Bella is engaged in the business of designing, manufacturing, warranting, marketing, importing, distributing and selling the pressure cookers at issue in this litigation.

13. Defendant Bella boasts that its pressure cookers feature an “[e]xtremely safe and secure locking system”⁴ or “safety valve” which creates “added safety and control” and allows the consumer to “cook a variety of foods.”⁵ Defendant Bella also claims that the “Bella 6Qt pressure cooker is the latest generation multi-use kitchen appliance”⁶ and that it features a “unique pressure release button to quickly expel pressure” to purportedly protect the user from hot steam.

14. According to the Owner’s Manual accompanying each individual unit sold, the pressure cookers feature a “safety valve” which purportedly keeps the lid from the pressure cooker from opening once pressurize. Specifically:

- a. WHEN COOKING UNDER PRESSURE, THE PRESSURE COOKER CANNOT BE OPENED ONCE PRESSURE IS REACHED. DO NOT TRY TO FORCE THE LID OPEN.⁷

15. By reason of the forgoing acts or omissions, the above-named Plaintiff and her family purchased the pressure cooker with the reasonable expectation that it was properly designed and manufactured, free from defects of any kind, and that it was safe for its intended, foreseeable use of cooking.

16. Plaintiff used her pressure cooker for its intended purpose of preparing meals for herself and/or family and did so in a manner that was reasonable and foreseeable by the Defendant Bella.

⁴ See <https://bellahousewares.com/products-bella/5qt-pressure-cooker/> (last accessed November 1, 2020).

⁵ *Id.*

⁶ *Id.*

⁷ See Bella 5qt Pressure Cooker Model No. JY-PC20US-5P Owner’s Manual, pg.6.

17. However, the aforementioned pressure cooker was defectively and negligently designed and manufactured by Defendant Bella in that it failed to properly function as to prevent the lid from being removed with normal force while the unit remained pressurized, despite the appearance that all the pressure had been released, during the ordinary, foreseeable and proper use of cooking food with the product; placing the Plaintiff, her family, and similar consumers in danger while using the pressure cookers.

18. Defendant Bella's pressure cookers possess defects that make them unreasonably dangerous for their intended use by consumers because the lid can be rotated and opened while the unit remains pressurized.

19. Further, Defendant Bella's representations about "safety" are not just misleading, they are flatly wrong, and put innocent consumers like Plaintiff directly in harm's way.

20. Economic, safer alternative designs were available that could have prevented the Pressure Cooker's lid from being rotated and opened while pressurized.

21. Defendant Bella knew or should have known that its pressure cookers possessed defects that pose a serious safety risk to Plaintiff and the public. Nevertheless, Defendant Bella continues to ignore and/or conceal its knowledge of the pressure cookers' defects from the general public and continues to generate a substantial profit from the sale of their pressure cookers.

22. As a direct and proximate result of Defendant Bella's concealment of such defects, its failure to warn consumers of such defects, its negligent misrepresentations, its failure to remove a product with such defects from the stream of commerce, and its negligent design of such products, Plaintiff used an unreasonably dangerous pressure cooker, which resulted in significant and painful bodily injuries upon Plaintiff's simple removal of the lid of the Pressure Cooker.

23. Consequently, the Plaintiff in this case seeks compensatory damages resulting from the use of Defendant Bella's pressure cooker as described above, which has caused the Plaintiff to suffer from serious bodily injuries, medical expenses, physical pain, mental anguish, diminished enjoyment of life, and other damages.

SPECIFIC COUNTS

COUNT ONE

PURSUANT TO THE NEW JERSEY PRODUCTS LIABILITY ACT
(N.J.S.A. §2A:58C-1 et. seq.)

24. Plaintiff incorporates by reference each preceding and succeeding paragraph as though set forth fully at length herein.

25. This Count is brought pursuant to N.J.S.A. §2A:58C-1 et. seq., the New Jersey Products Liability Act.

26. At the time of Plaintiff's injuries, Defendant's pressure cookers were defective and unreasonably dangerous for use by foreseeable consumers, including Plaintiff.

27. Defendant's actions and omissions were the direct and proximate cause of the Plaintiff's injuries and damages.

28. Defendant, under all applicable laws including, but not limited to, the New Jersey Products Liability Act, N.J.S.A. §2A:58C-1 et. seq. is liable unto Plaintiff for her injuries and damages for designing, manufacturing, assembling, marketing, distributing, and/or selling the aforesaid pressure cooker that was unreasonably dangerous in construction or composition, in design, because inadequate warnings about the product had not been provided, and/or because the pressure cooker did not conform to the implied and express warranties of the manufacturer about this product.

29. Specifically, Defendant's pressure cookers are unreasonably dangerous due to the pressure cooker's lid being able to be rotated and opened while the pressure cooker was still under pressure, during the normal, directed use of the pressure cooker, allowing its scalding hot contents to be forcefully ejected from the pressure cooker and onto the Plaintiff, as it did in this case.

30. Further, a reasonable consumer, including Plaintiff, would not have reason to expect that the subject pressure cooker would retain pressure despite the appearance that all pressure had been released, would not be able detect any such defect, and would not have any knowledge as to how to prevent such an incident occurring.

WHEREFORE, Plaintiff demands judgment against Defendant for damages, together with interest, costs of suit and all such other relief as the Court deems proper

JURY TRIAL DEMANDED

31. Plaintiff is entitled to and demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demand judgment against the Defendant as follows:

A. On the **FIRST CAUSE OF ACTION**, compensatory damages, interest, attorneys' fees, costs of suit and any such other relief as the Court deems just and proper.

Respectfully submitted,

**MILBERG COLEMAN BRYSON PHILLIPS
GROSSMAN, PLLC**

Date: May 18, 2022

/s/ Marc Grossman, Esq.

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Attorneys for Plaintiff

EXHIBIT A

**Bella 5qt Pressure Cooker Model
No. JY-PC20US-5P Owner's
Manual**



PRESSURE COOKER OLLA A PRESIÓN



Instruction Manual

Manual de instrucciones

Register your product and get support at:
Para registrar y obtener asistencia de su producto ir:

www.bellahousewares.com/welcome

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IMPORTANT SAFEGUARDS

When using Pressure Cookers, basic safety precautions should always be followed:

1. READ ALL INSTRUCTIONS.

2. Do not touch hot surfaces. Use handles or knobs to lift or move the appliance.
3. This appliance is not intended for use by persons (including children) with reduced physical, sensory or mental capabilities, or lack of experience and knowledge.
4. Close supervision is necessary when the pressure cooker is used near children.
5. Do not place the Pressure Cooker in a heated oven.
6. Extreme caution must be used when moving a Pressure Cooker containing hot liquids.
7. Do not use or place Pressure Cooker for other than intended use.
8. This appliance cooks under pressure. Improper use may result in scalding injury. When using this appliance for any function except browning, make certain lid is properly closed and locked before operating. See Operating Instructions.
9. Do not fill the unit over 2/3 full. When cooking foods that expand during cooking such as rice or dried vegetables, do not fill the unit over 1/2 full. Over-filling may cause a risk of clogging the pressure release valve, vent pipe, and safety valve and may develop excess pressure.
10. Be aware that certain foods, such as applesauce, cranberries, pearl barley, oatmeal or other cereals, split peas, noodles, macaroni, rhubarb, or spaghetti can foam, froth, and sputter, and clog the pressure release valve, vent pipe, and safety valve. These foods should not be pressure cooked in this unit.
11. Always check the pressure release valve, vent pipe, and safety valve for clogging before use and clean if necessary. Check to make sure the lid lock moves freely from under the lid.
12. Do not open the Pressure Cooker until the unit has cooled and all internal pressure has been released. If the handles are difficult to rotate or pull apart, the Pressure Cooker is still pressurized.

CAUTION: DO NOT FORCE THE LID OPEN. Any pressure in the Pressure Cooker can be hazardous. See Operating Instructions for a complete description of steam release.

13. Do not use this Pressure Cooker for pressure frying with oil.
14. **Add at least 1 cup (8 oz.) liquid to the cooking pot when cooking under pressure or steaming.** Always make sure that there is enough liquid in the cooking pot to create steam and avoid evaporation.
15. When the normal operating pressure is reached, turn the heat down so all the liquid, which creates the steam, does not evaporate.
NOTE: During the cooking process, as excess pressure escapes, it is normal to occasionally hear a hissing sound from the pressure release valve or safety valve when the air pressure increases inside the cooking pot.
16. **DO NOT** leave prepared food in the cooking pot. Your Pressure Cooker is not a storage device.
17. Replace the silicone gasket if it is cracked, or worn, or deteriorated in any way.
18. Never use your Pressure Cooker without liquids; this could cause serious damage.

19. Pierce any meats which have an outer layer of skin (such as beef tongue), which could swell due to the effects of pressure. To avoid burning injuries, do not pierce the skin after cooking if it appears swollen.
20. When cooking thick foods, it is best to lightly shake the Pressure Cooker before opening to ensure that hot food does not spurt out.

FOR HOUSEHOLD USE ONLY SAVE THESE INSTRUCTIONS

ADDITIONAL IMPORTANT SAFEGUARDS

CAUTION, HOT SURFACES: This appliance generates heat and escaping steam during use. Proper precautions must be taken to prevent the risk of burns, fires, or other injury to persons or damage to property.

1. A person who has not read and understood all operating and safety instructions is not qualified to operate this appliance. All users of this appliance must read and understand this instruction manual before operating or cleaning this appliance.
2. When using this appliance, provide adequate air space above and on all sides for air circulation. Do not operate this appliance while it is touching or near curtains, wall coverings, clothing, dishtowels or other flammable materials.
3. Never operate the Pressure Cooker under cabinets. When releasing steam, make sure the area several feet above the pressure release valve is clear from all lighting fixtures, furniture or cabinetry.
4. To reduce the risk of fire or injury, do not leave this appliance unattended during use.
5. If this appliance begins to malfunction during use, immediately turn OFF the heat. Do not use or attempt to repair a malfunctioning appliance!
6. Do not use this appliance in an unstable position.
7. Allow the appliance to cool before putting on or taking off parts, and before cleaning the appliance.
8. The use of accessory attachments not recommended by the appliance manufacturer may cause fire, electrical shock or personal injury.
9. When placing the lid onto the cooking pot to lock, turn so that the top lid handle is to the right of the bottom cooking pot handle. (See Figure 5.) Rotate the top lid handle clockwise to lock. (See Figure 6.)
CAUTION: An improperly closed lid may result in the risk of injury to persons or damage to the unit.
10. Do not lift the appliance by the lid handle when moving the appliance. When moving the appliance, use both the lid and cooking base handles.
11. Wash the lid and silicone gasket after every use.
12. Keep the pressure release valve and safety valve clean and free of unwanted materials.

CAUTION: PRESSURE MUST BE FULLY RELEASED BEFORE OPENING THE LID.

13. Do not place any foreign objects onto the pressure release valve or the safety valve.
14. **CAUTION:** Keep hands and face clear of the pressure release valve and safety valve when the appliance is in operation. Hot steam and water may be emitted during use.
15. Do not touch the cooking pot or lid while the Pressure Cooker is in operation. Surfaces may be hot.
16. Do not begin to pressure cook when cooking utensils are inside the cooking pot.

INTRODUCTION TO PRESSURE COOKING

Enjoy your pressure cooked one-pot meals... toss all your ingredients into the cooking pot for fast and delicious, nutritious, no-stress, no-mess meals for any night of the week. Pressure cooking forces nutrient-rich steam and heat through foods, tenderizes fibrous meats and allows flavors to intensify. Using high pressure, traditional cooking times of most foods can be reduced by up to 70%.

WARNING: Do not pressure cook foods such as applesauce, cranberries, pearl barley, oatmeal or other cereals, split peas, noodles, macaroni, rhubarb, or spaghetti. These foods tend to foam, froth and sputter, and may block the pressure release valve.

1. Your Pressure Cooker cooks combines steam heat and pressure for faster cooking times. Since an air tight seal is formed when the lid is closed and locked, the heat and steam stay trapped inside the cooking pot. The combination of high heat and pressure cooks the food faster while retaining water soluble nutrients and flavor.
2. The large, 5-quart capacity, heavy-duty cooking pot heats up quickly and evenly.
IMPORTANT: Since overcooked food cannot be corrected, it is advisable to err on the undercooked side by cooking an unfamiliar food for a shorter period of time than you may think necessary. You can always continue cooking 1 or 2 minutes longer if need be.
3. When preparing more than one food at a time, make sure foods have similar cooking times and temperatures.

Getting to Know Your 5 Qt./ L Pressure Cooker

Product may vary slightly from illustration

Figure 1

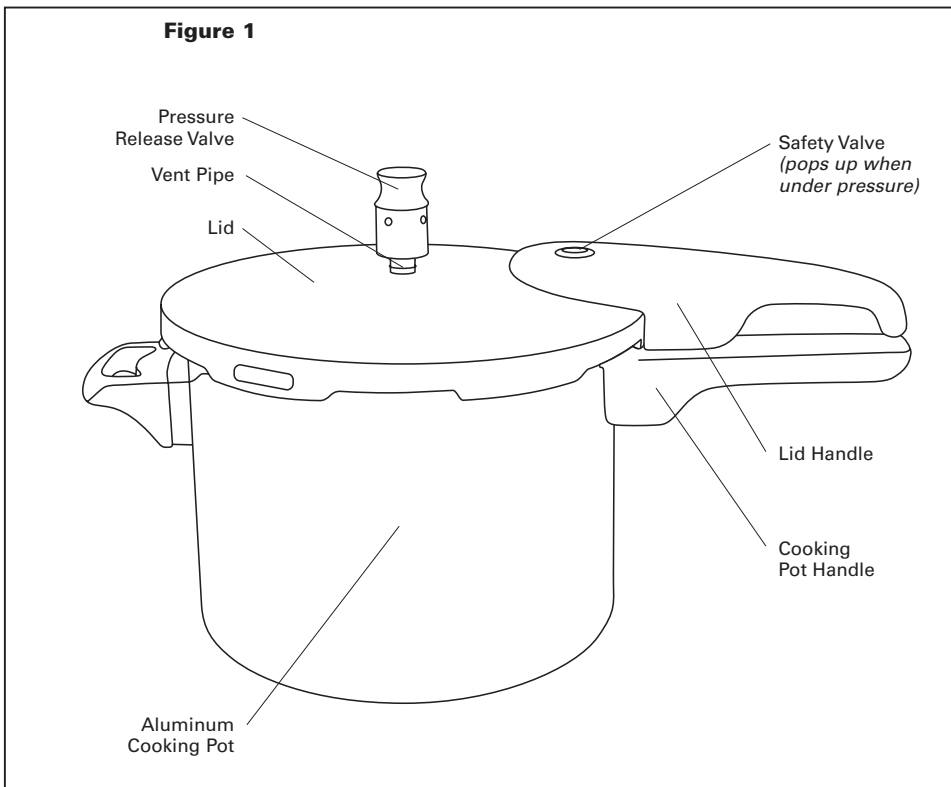
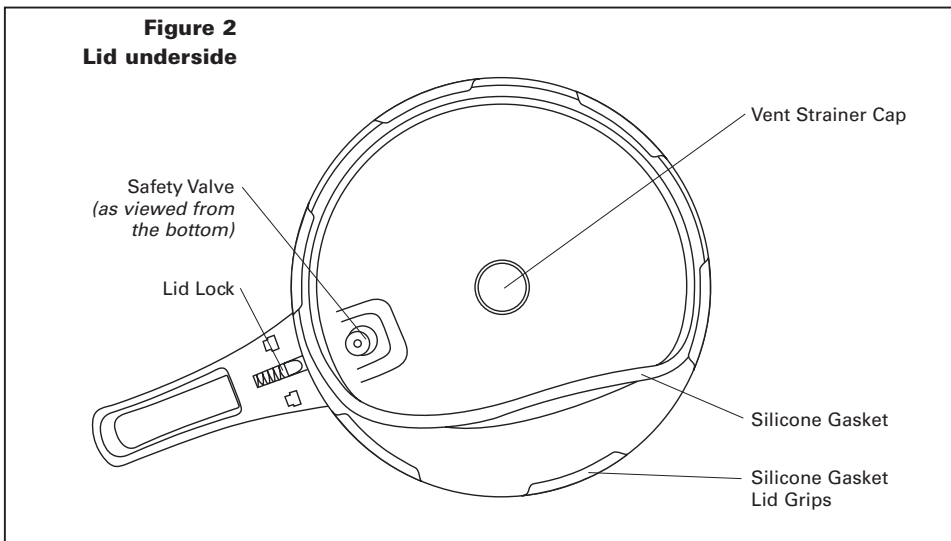
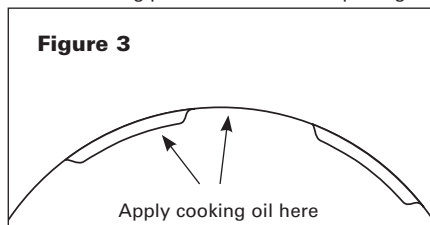


Figure 2
Lid underside



Before Using for the First Time

1. Before using the Pressure Cooker for the first time, familiarize yourself with all safety features and lid components.
2. Wash cooking pot, lid, and silicone gasket in warm soapy water. Rinse and dry thoroughly.
3. Apply a small amount of cooking oil on the underside of the cooking pot rim to facilitate opening and closing of the Pressure Cooker. (See Figure 3.)
4. Fit the gasket into the grips along inside of the lid.
IMPORTANT: To avoid deterioration, NEVER apply oil to the gasket.
5. Firmly grasp the lid handle and rotate counter-clockwise to unlock. Lift the lid up and off the appliance.
6. When cooking under pressure, never place the Pressure Cooker under cabinets. When releasing steam, make sure the area several feet above the pressure release valve is clear from all lighting fixtures, furniture or cabinetry.



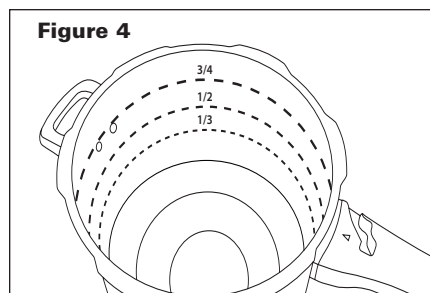
Before Each Use

1. Always check the lid to ensure that the pressure release valve, vent pipe, and safety valve are in good working order and that there are no foreign particles blocking the valve openings on the underside of the lid.
2. Check to see that the gasket is attached properly within the grips along inside of the lid. (See Care & Cleaning Instructions for assembly details.)

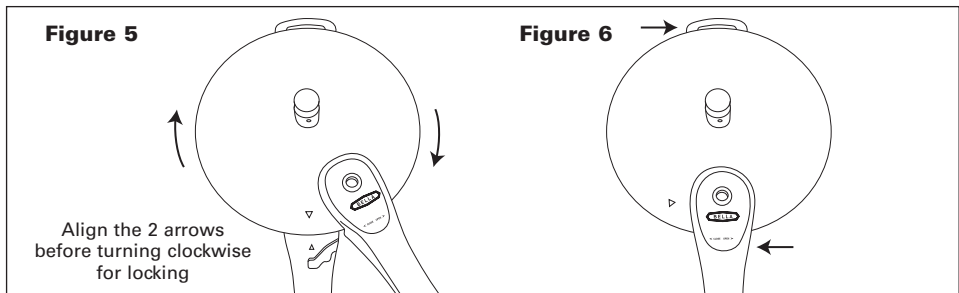
Operating Instructions

1. Place food to be cooked into the cooking pot. (See Figure 4.)
IMPORTANT: Do not fill the cooking pot more than 2/3 full when cooking vegetables or whole pieces of meat.
IMPORTANT: Do not fill the cooking pot more than 1/2 full when pressure cooking foods that expand: rice, dried beans, grains, and legumes.
IMPORTANT: Add at least 1 cup (8 oz.) liquid to the cooking pot when cooking under pressure.
2. **CAUTION:** Never operate the appliance when it is empty. Do not cook when food content is less than 1/3 of the cooking pot. (See Figure 4.)

Apply cooking oil here



3. Visually examine the lid's steam vent pipe for obstructions before using the Pressure Cooker.
4. To examine the steam vent pipe, unscrew the pressure release valve on top of the lid. (See Care & Cleaning Instructions, Figure 7.)
5. Turn the lid over and carefully remove the strainer cap from the inside of the lid. (See Figure 1.)
6. Hold the lid up to a light to confirm that the vent is clear of any obstruction. If the steam vent pipe is blocked, use a pipe cleaner or a small brush to remove the obstruction before using the Pressure Cooker. Replace the pressure release valve and the strainer cover before using the unit.
7. Check to see that the gasket is secure within the grips along inside of the lid. (See Care & Cleaning Instructions for assembly details.)
8. When placing the lid onto the cooking pot to lock, turn so that the top lid handle is to the right of the bottom cooking pot handle. (See Figure 5.) Rotate the top lid handle clockwise until the lid and the cooking base handles are locked together in perfect alignment. (See Figure 6.)
IMPORTANT: If the pressure release valve is not closed or assembled properly, the Pressure Cooker will not build enough pressure; the liquids may boil dry and cause the food to burn.
9. As the appropriate pressure/temperature is achieved, there will be a slight hissing of steam from the safety valve on the handle. The safety valve will begin to rise and fall as pressure mounts.
10. After approximately 10 minutes, (or more depending on the amount of water added to the cooking pot) the safety valve will rise to its uppermost position; begin recipe pressure cooking time at this point.
CAUTION: Keep hands and face clear of the pressure release valve and the safety valve when the appliance is in operation. Hot steam and water may be emitted during use.
CAUTION: WHEN COOKING UNDER PRESSURE, THE PRESSURE COOKER CANNOT BE OPENED ONCE PRESSURE IS REACHED. DO NOT TRY TO FORCE THE LID OPEN.



11. When pressure cooking time has lapsed, steam must be released naturally, or quickly.
12. Allow the pressure to **NATURAL STEAM RELEASE** (release steam and cool down in time) or with a mitted hand, use a utensil to flip the pressure release valve up to **QUICK RELEASE** the remaining steam.
13. After the steam has been fully released, the safety valve will drop down into the lid. At this point, the lid may be removed. Holding the cooking pot handle firmly in one hand, grasp the lid handle with the other hand and rotate the lid counter-clockwise to unlock.
WARNING: Use caution when opening lid. Steam escapes as soon as the lid is opened. Remove the lid, tilting it away from you to avoid steam. Never place your face or hands over the Pressure Cooker when removing the lid. Always use oven mitts when handling the hot cooking pot.
CAUTION: After making soups and stock, allow several minutes before releasing the pressure and removing the lid to make sure the hot liquid will not boil over.
14. Check the food to see if it has been cooked sufficiently. If not, replace the lid and lock into position following the previous Operating Instructions. Cook under pressure an additional 2 to 3 minutes if necessary.
15. Allow the appliance to cool before cleaning. Follow the Care & Cleaning Instructions outlined in this instruction manual.

Browning/Searing

- Browning/searing food in the cooking pot adds richness and flavor to pressure cooked foods; one-pot cooking means easy clean-up.
WARNING: Never deep-fry or pressure-fry in the Pressure Cooker, regardless of whether the lid is on or off. **THIS IS DANGEROUS AND CAN CAUSE A FIRE AND SERIOUS DAMAGE.**
WARNING: Make sure the lid is removed when **BROWNING** foods.
- For best results, food should be patted dry with paper towels and cut into small, uniform pieces. Brown food in small batches.
- Add the appropriate amount of oil (or non-stick cooking spray), as called for in the recipe.
- Remove lid when browning or searing.
- Heat uncovered over medium heat for 2 to 4 minutes. When food is satisfactorily seared, add the remainder of the food and continue cooking with the Pressure Cooker according to recipe directions.
- Remove Pressure Cooker from the heat and allow to cool slightly before adding liquid to the cooking pot.

Steaming

- Pressure quickly brings cooking liquid to a boil for steaming food.
- To **STEAM** cook foods like vegetables, place a small non-metal, heat-resistant plastic or bamboo steaming rack or basket (**NOT INCLUDED**) into the cooking pot and add 1 cup water or cooking liquid.
- Place the food on the rack. For best results, do not overfill or pack the food down.

Vegetables

- Peel vegetables when appropriate, or scrub them well. Keep in mind that hard vegetables such as potatoes and beets hold their shape better when the peel is left intact.
- Vegetables may be cooked whole or chopped into pieces. The larger the pieces, the longer it will take to cook.
- Vegetables with the same cooking time may be cooked together.

- Since quick-cooking vegetables like zucchini, asparagus and broccoli may easily be overcooked, it is best to steam rather than pressure-cook them.

General Tips for Pressure Cooking Beans

- Pressure-cooked beans are tender in record time. But since some varieties do not hold their shape, plan to use pressure-cooked beans for soups or stews rather than for bean salads.
- Set dried beans in a strainer or colander and rinse well. Discard any broken beans.
- Pre-soaking beans is optional, but encourages more even cooking and aids digestibility. If time permits, soak beans in ample water and cover for 6 to 8 hours or overnight. With limited time, soak in a large, covered bowl in warm water one hour before cooking. For fastest time, soak 15 to 30 minutes in boiling water. The actual cooking times will vary depending on how old the beans are.
- Drain and rinse. Cook beans in fresh water. Always add vegetable oil to reduce excess foaming.
- If you wish, add tomatoes, onion, bay leaves, and garlic to flavor the beans and broth.
- Since the time required to cook beans varies from batch to batch, you may choose to do the majority of cooking under pressure and then finish off the beans by cooking them uncovered. Stir in additional water as needed if the cooking liquid becomes very thick.
- Add salt during the final few minutes of cooking. Adding salt at the beginning may harden bean skins and prevent proper cooking.
- Ladle beans into a colander set over a large bowl. Drain beans. Remove bay leaves. If desired, reserve cooking liquid for use as cooking base for soups and stews.
- Leftover beans may be frozen in convenient portion sizes.

Precautions When Cooking Beans

- When cooking beans alone (rather than in a soup or stew), do not exceed the 1/2 of the cooking pot.
- TO CONTROL FOAMING AS BEANS COOK, ALWAYS ADD 2 TEASPOONS OF OIL PER CUP OF DRIED BEANS TO THE COOKING LIQUID.
- Take great care when removing the lid, as there will be considerable steam in the Pressure Cooker.
- Clean the pressure release valve and gasket thoroughly after cooking beans.

Pressure Cooking Rice

Up to 5-1/4 cups of uncooked white rice may be cooked in your 5 Qt. Pressure Cooker. Many varieties of rice can be used including: basmati, wild rice, black rice, Arborio, risotto, brown, long and short grains. Do not use your Pressure Cooker to cook instant rice. (For estimated times and rice to water / cooking liquid quantities, please refer to the RICE COOKING CHART that follows.)

Rice Cooking Chart

IMPORTANT: Add one tablespoon of oil (vegetable, olive, sesame) to reduce excess foaming.

NOTE: Use a measuring cup to measure both rice and water.

RAW WHITE RICE (cups)	WATER (cups)	RAW BROWN RICE (cups)	WATER (cups)
1.5	2.25	1.5	2.5
2.25	3.5	2.25	3.75
3	4.5	3	4.75
3.75	5.5	3.75	5.75
4.5	6.75	4.5	7
5.25	7.75	5	8

*Actual cooking times may vary depending on the age of the grain and personal preference.

Pressure Cooking Grains

Whole grains cook so quickly in the Pressure Cooker that they can become a regular part of your diet. Here are a few things to keep in mind:

- Timing varies from one batch of grains to the next, depending upon age and storage conditions. Remember that whole grains such as wheat berries and brown rice always remain a bit chewy, even when thoroughly cooked.
- Grains that have the same cooking time may be cooked together.
- Leftover grains may be frozen in convenient portion sizes. Defrost them in the microwave.

Precautions When Cooking Grains

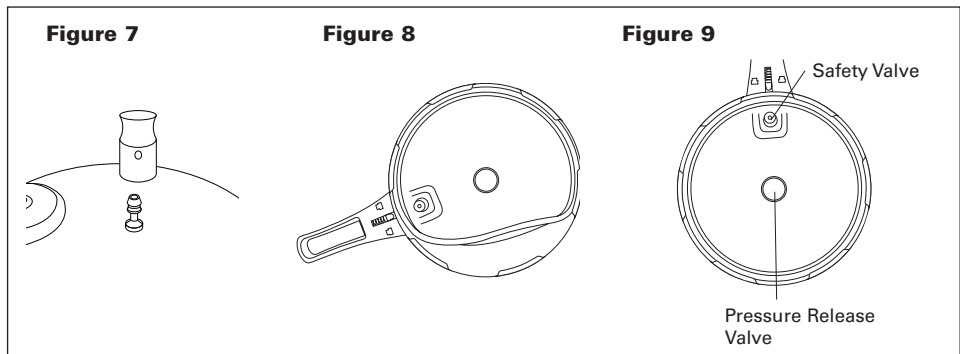
- When cooking dried grains alone (rather than in a soup or stew), never fill Pressure Cooker more than the 1/2 line on the cooking pot.
- TO REDUCE EXCESS FOAMING AS GRAINS COOK, ALWAYS ADD 1 TABLESPOON OF OIL PER CUP OF DRIED GRAINS.
- Do not cook more than 2.25 cups of dried grains at a time.
- Clean the pressure release valve, vent pipe, safety valve, and gasket thoroughly after cooking grains.

User Maintenance Instructions

This appliance requires little maintenance. It contains no user-serviceable parts. Any servicing requiring disassembly other than cleaning must be performed by a qualified appliance repair technician.

Care & Cleaning Instructions

1. Let the Pressure Cooker cool to room temperature before cleaning.
2. Wash the cooking pot with warm soapy water and a clean, soft cloth or sponge. Rinse with clean water and dry thoroughly.
3. Remove and disassemble the lid.
4. Unscrew the pressure release valve from the lid. (See Figure 7.)
5. Gently pull the gasket out from the grips along inside of the lid. (See Figure 8.) Check periodically to make sure that it is clean, flexible and not cracked or torn. If damaged, do not use this appliance.
6. Wash gasket in warm, soapy water. Rinse with clean water and dry thoroughly.
7. Wash the inside of the lid with a wet, soapy sponge or cloth. Use a brush to remove oil residue if necessary. Wipe dry with a clean, damp cloth.
8. Check for blockage. If needed, use a small brush or pipe cleaner to clean the pressure release valve and safety valve. (See Figure 9.)
9. After cleaning, attach the clean gasket under the grips along the inside of the lid. (See Figure 8.)



IMPORTANT: The gasket must always be properly assembled to the underside of the lid.

WARNING: The pressure release valve and the safety valve **MUST BE** reassembled correctly to ensure safety as well as optimal performance of your Pressure Cooker.

10. Never use harsh chemical detergents, scouring pads or powders on any of the parts or components.

Storing Instructions

1. Allow unit to cool completely. Be sure all parts are clean and dry before storing. Assemble lid before storing.
2. Store the Pressure Cooker in its original box or covered in a cool, dry place.
3. To prevent aromas, mold and off flavors, never store your Pressure Cooker closed with the lid locked in place. Pack and store the Pressure Cooker with the lid resting upside-down on the cooking pot.



Limited TWO-YEAR Warranty

SENSIO Inc. hereby warrants that for a period of **TWO YEARS** from the date of purchase, this product will be free from mechanical defects in material and workmanship, and for 90 days in respect to non-mechanical parts. At its sole discretion, SENSIO Inc. will either repair or replace the product found to be defective, or issue a refund on the product during the warranty period.

The warranty is only valid for the original retail purchaser from the date of initial retail purchase and is not transferable. Keep the original sales receipt, as proof of purchase is required to obtain warranty validation. Retail stores selling this product do not have the right to alter, modify, or in any way revise the terms and conditions of the warranty.

EXCLUSIONS:

The warranty does not cover normal wear of parts or damage resulting from any of the following: negligent use of the product, use of improper voltage or current, improper routine maintenance, use contrary to the operating instructions, disassembly, repair, or alteration by anyone other than qualified SENSIO Inc. personnel. Also, the warranty does not cover Acts of God such as fire, floods, hurricanes, or tornadoes.

SENSIO Inc. shall not be liable for any incidental or consequential damages caused by the breach of any express or implied warranty. Apart from the extent prohibited by applicable law, any implied warranty of merchantability or fitness for a particular purpose is limited in time to the duration of the warranty. Some states, provinces or jurisdictions do not allow the exclusion or limitation of incidental or consequential damages, or limitations on how long an implied warranty lasts, and therefore, the above exclusions or limitations may not apply to you. The warranty covers specific legal rights which may vary by state, province and/or jurisdiction.

HOW TO OBTAIN WARRANTY SERVICE:

You must contact Customer Service at our toll-free number: 1-866-832-4843. A Customer Service Representative will attempt to resolve warranty issues over the phone. If the Customer Service Representative is unable to resolve the problem, you will be provided with a case number and asked to return the product to SENSIO Inc. Attach a tag to the product that includes: your name, address, daytime contact telephone number, case number, and description of the problem. Also, include a copy of the original sales receipt. Carefully package the tagged product with the sales receipt, and send it (with shipping and insurance prepaid) to SENSIO Inc.'s address. SENSIO Inc. shall bear no responsibility or liability for the returned product while in transit to SENSIO Inc.'s Customer Service Center.

MEDIDAS DE SEGURIDAD IMPORTANTES

Al utilizar ollas a presión, siempre deben cumplirse las precauciones de seguridad básicas:

1. LEA TODAS LAS INSTRUCCIONES.

2. No toque las superficies calientes. Use los mangos o perillas para levantar o mover el electrodoméstico.
3. Este electrodoméstico no se diseñó para ser usado por personas (incluyendo niños) con capacidades físicas, sensoriales o mentales reducidas, o con falta de experiencia y conocimientos.
4. Se requiere supervisión estricta al utilizar la olla a presión cerca de niños.
5. No coloque la olla a presión en un horno caliente.
6. Tenga especial cuidado al mover la olla a presión con líquidos calientes.
7. No utilice ni emplee la olla a presión para otros fines que no sean para los que fue diseñada.
8. Este electrodoméstico cocina a presión. Si se usa de forma inadecuada, podría generar lesiones por quemaduras. Cuando utilice este electrodoméstico para cualquier función excepto dorar, asegúrese de que la tapa esté correctamente cerrada y bloqueada antes de poner en funcionamiento. Vea las instrucciones de funcionamiento.
9. No llene la unidad por encima de los 2/3 de su capacidad. Cuando cocine alimentos que se expanden durante la cocción como arroz o verduras desecadas, no llene la unidad por encima de la mitad de su capacidad. Si llena la olla en exceso, podría obstruir la válvula de liberación de presión, el tubo de ventilación y la válvula de seguridad y podría generar presión en exceso.
10. Recuerde que algunos alimentos como compota de manzana, arándanos, cebada perlada, avena u otros cereales, guisantes partidos, fideos, macarrones, ruibarbo o espagueti pueden hacer espuma, burbujas y chisporrotear y obstruir la válvula de liberación de presión, el tubo de ventilación y la válvula de seguridad. No debe cocinar a presión estos alimentos en esta unidad.
11. Siempre verifique la válvula de liberación de presión, el tubo de ventilación y la válvula de seguridad para detectar obstrucciones antes de cada uso y limpie, de ser necesario. Asegúrese de que el seguro de la tapa se mueva libremente desde debajo de la tapa.
12. No abra la olla a presión hasta que la unidad se haya enfriado y se haya liberado toda la presión interna. Si le resulta difícil girar o separar los mangos, significa que la olla a presión aún está presurizada.
PRECAUCIÓN: NO HAGA FUERZA PARA ABRIR LA TAPA. La presión de la olla a presión puede ser peligrosa. Para obtener una descripción completa de la liberación de vapor, vea las Instrucciones de funcionamiento.
13. No utilice la olla a presión para freír con aceite a presión.
14. **Agregue al menos 1 taza (8 oz [237 ml]) de líquido a la cacerola de cocción cuando cocine a presión o al vapor.** Asegúrese siempre de que haya líquido suficiente en la cacerola de cocción para que se genere vapor y evitar la evaporación.
15. Cuando se alcance la presión normal de funcionamiento, baje el fuego para que no se evapore todo el líquido que genera el vapor.

NOTA: Durante el proceso de cocción, debido a la salida del exceso de presión, es normal escuchar de tanto en tanto un silbido de la válvula de liberación de presión o la válvula de seguridad a medida que aumenta la presión de aire dentro de la cacerola de cocción.

16. NO deje alimentos preparados dentro de la cacerola de cocción. La olla a presión no es un dispositivo de almacenamiento.
17. Cambie la junta de silicona si está quebrada, gastada o deteriorada de alguna modo.
18. No utilice nunca la olla a presión sin líquido, ya que podría causar daños graves.
19. Pinche las carnes que tengan una capa externa de piel (como la lengua de ternera), que pudiera aumentar su tamaño por el efecto de la presión. Para evitar quemaduras, no pinche la piel después de cocinar si cree que ha aumentado de tamaño.
20. Cuando cocine alimentos gruesos, es conveniente agitar ligeramente la olla a presión antes de abrirla para asegurarse de que el alimento caliente no salpique.

SOLO PARA USO DOMÉSTICO

GUARDE ESTAS INSTRUCCIONES

OTRAS MEDIDAS DE SEGURIDAD IMPORTANTES

PRECAUCIÓN, SUPERFICIES CALIENTES: Este electrodoméstico genera calor y libera vapor mientras está en funcionamiento. Se deben tomar las medidas de precaución adecuadas para evitar el riesgo de quemaduras, incendios u otros tipos de lesiones o daños materiales.

1. Las personas que no hayan leído y comprendido todas las instrucciones de funcionamiento y seguridad no deben utilizar este electrodoméstico. Todos los usuarios de este electrodoméstico deben leer y comprender este manual de instrucciones antes de poner en funcionamiento o limpiar la unidad.
2. Cuando utilice este electrodoméstico, proporcione una buena ventilación por encima y a los lados de la unidad para que circule el aire. No utilice este electrodoméstico mientras esté en contacto con cortinas o cerca de cortinas, recubrimientos de pared, ropa, paños de cocina u otros materiales inflamables.
3. No utilice nunca la olla a presión debajo de gabinetes. Al liberar el vapor, asegúrese de que haya un espacio de varios pies o metros por encima de la válvula de liberación de presión y que esté libre de artefactos de iluminación, muebles o armarios.
4. Para reducir el riesgo de incendio o lesiones, no deje este electrodoméstico sin supervisión mientras está en funcionamiento.

5. Si el electrodoméstico comienza a funcionar mal mientras está en funcionamiento, APAGUE el calor de inmediato. ¡No utilice ni intente reparar el electrodoméstico si funciona mal!
6. No utilice este electrodoméstico en una posición inestable.
7. Deje que se enfríe antes de colocar o retirar piezas, y antes de limpiar el electrodoméstico.
8. El uso de accesorios o aditamentos no recomendados por el fabricante del electrodoméstico puede provocar incendios, descargas eléctricas o lesiones físicas.
9. Cuando coloque la tapa sobre la cacerola de cocción para bloquearla, gírela de manera que el mango superior de la tapa quede a la derecha del mango inferior de la cacerola de cocción. (Vea la Figura 5). Gire el mango superior de la tapa en sentido horario para bloquear. (Vea la Figura 6).
PRECAUCIÓN: Si cierra la tapa de manera inadecuada, podría ocasionar lesiones a personas o dañar la unidad.
10. No levante el electrodoméstico del mango de la tapa cuando lo mueva. Para mover el electrodoméstico, use los mangos de la base de cocción y de la tapa.
11. Lave la tapa y la junta de silicona después de cada uso.
12. Mantenga la válvula de liberación de presión y la válvula de seguridad limpias y libres de materiales no deseados.
PRECAUCIÓN: DEBE LIBERAR TODA LA PRESIÓN ANTES DE ABRIR LA TAPA.
13. No coloque objetos extraños en la válvula de liberación de presión o la válvula de seguridad.
14. **PRECAUCIÓN:** Mantenga las manos y el rostro alejados de la válvula de liberación de presión y de la válvula de seguridad cuando el electrodoméstico está en funcionamiento. Durante el uso, es posible que la olla despidiera agua y vapor calientes.
15. No toque la cacerola de cocción ni la tapa mientras la olla a presión está en funcionamiento. Las superficies podrían estar calientes.
16. No comience a cocinar a presión cuando los utensilios de cocción se encuentran dentro de la cacerola de cocción.

INTRODUCCIÓN A LA COCCIÓN A PRESIÓN

Disfrute las comidas hechas en una misma olla y cocinadas a presión...

Coloque todos los ingredientes en la cacerola de cocción para obtener comidas rápidas y deliciosas, nutritivas, sin esfuerzo ni desorden cualquier noche de la semana. La cocción a presión fuerza el ingreso de calor y vapor rico en nutrientes hacia los alimentos, hace más tiernas las carnes fibrosas e intensifica los sabores. Si utiliza presión alta, los tiempos de cocción habituales de la mayoría de los alimentos se pueden reducir hasta en un 70 %.

ADVERTENCIA: No cocine a presión alimentos tales como compota de manzana, arándanos, cebada perlada, avena u otros cereales, guisantes partidos, fideos, macarrones, ruibarbo o espagueti. Estos alimentos tienden a hacer espuma, burbujas y chisporrotear y podrían obstruir la válvula de liberación de presión.

1. La cocción en la olla a presión combina la presión y el calor del vapor para acelerar los tiempos de cocción. Debido a la formación de un sello hermético de aire al cerrar y bloquear la tapa, el calor y el vapor se mantienen atrapados dentro de la cacerola de cocción. La combinación del calor y la presión elevados cocina los alimentos más rápido y, a la vez, retiene los nutrientes solubles en agua y el sabor.

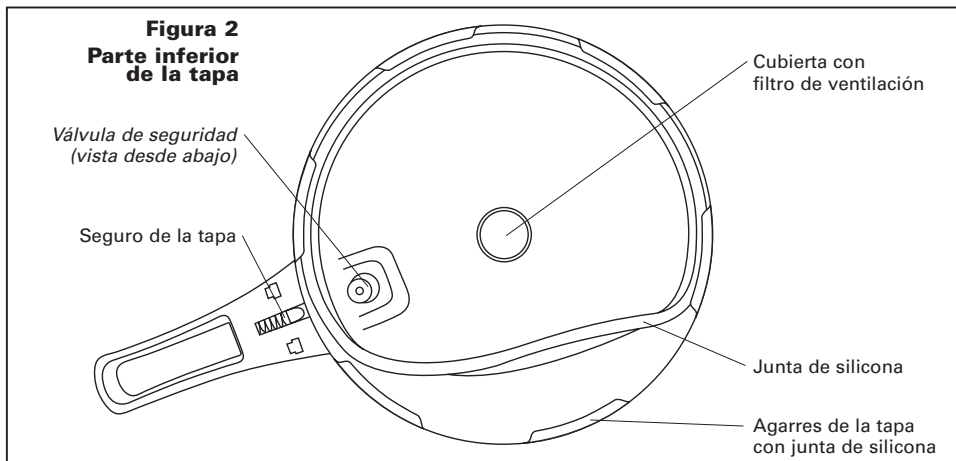
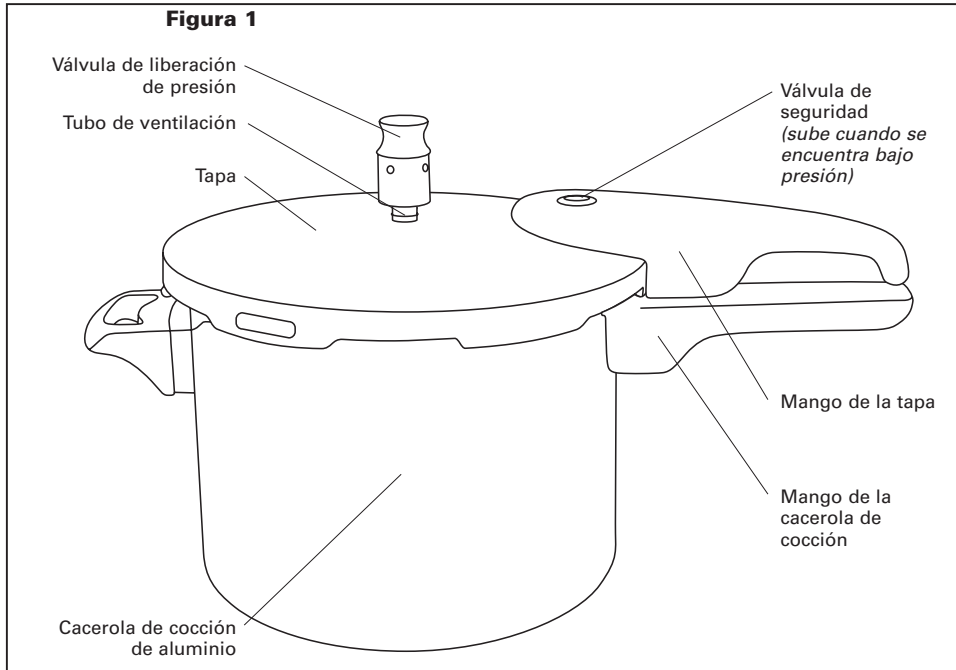
2. La cacerola de cocción grande de gran resistencia y 5 cuartos de capacidad (4,7 L) se calienta de manera rápida y uniforme.

IMPORTANTE: Debido a que la cocción en exceso de los alimentos es irreversible, es preferible cocinar de menos cuando cocina un alimento que no conoce durante un período de tiempo menor que el que cree necesario. Siempre podrá continuar cocinando 1 o 2 minutos más si lo desea.

3. Cuando prepare más de un alimento a la vez, asegúrese de que tengan temperaturas y tiempos de cocción similares.

Conozca su olla a presión de 5 cuartos/4,7 L

El producto puede variar ligeramente con respecto a la ilustración.

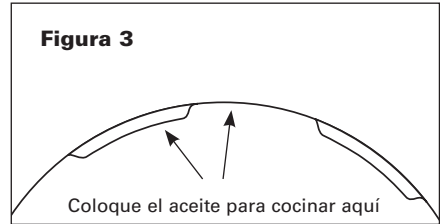


Antes de utilizar por primera vez

1. Antes de utilizar la olla a presión por primera vez, debe familiarizarse con todas las medidas de seguridad y los componentes de la tapa.
2. Lave la cacerola de cocción, la tapa y la junta de silicona en agua tibia y jabón. Enjuague y seque completamente.
3. Aplique una pequeña cantidad de aceite para cocinar en la parte inferior del borde de la cacerola de cocción para facilitar la apertura y cierre de la olla a presión. (Vea la Figura 3).
4. Coloque la junta dentro de los agarres en la parte interna de la tapa.

IMPORTANTE: Para evitar deterioro, NUNCA coloque aceite en la junta.

5. Sostenga con firmeza el mango de la tapa y gire en sentido antihorario para desbloquear. Levante la tapa y quítela del electrodoméstico.
6. Cuando cocine a presión, no coloque nunca la olla a presión debajo de un gabinete. Al liberar el vapor, asegúrese de que haya un espacio de varios pies o metros por encima de la válvula de liberación de presión y que esté libre de artefactos de iluminación, muebles o armarios.



Antes de cada uso

1. Siempre verifique la tapa para asegurarse de que la válvula de liberación de presión, el tubo de ventilación y la válvula de seguridad funcionen correctamente y no haya partículas extrañas que bloqueen la apertura de la válvula en la parte inferior de la tapa.
2. Verifique que la junta esté colocada correctamente dentro de los agarres en la parte interna de la tapa. (Para obtener más información sobre el armado, vea las Instrucciones de cuidado y limpieza)

Instrucciones de funcionamiento

1. Coloque el alimento que cocinará en la cacerola de cocción. (Vea la Figura 4).

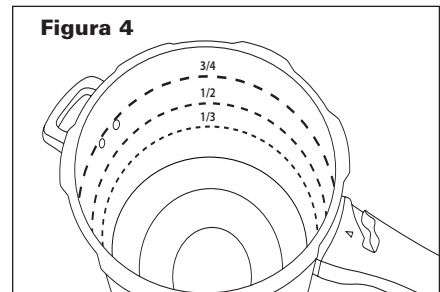
IMPORTANTE: No llene la cacerola de cocción por encima de los 2/3 de capacidad cuando cocina verduras o trozos enteros de carne.

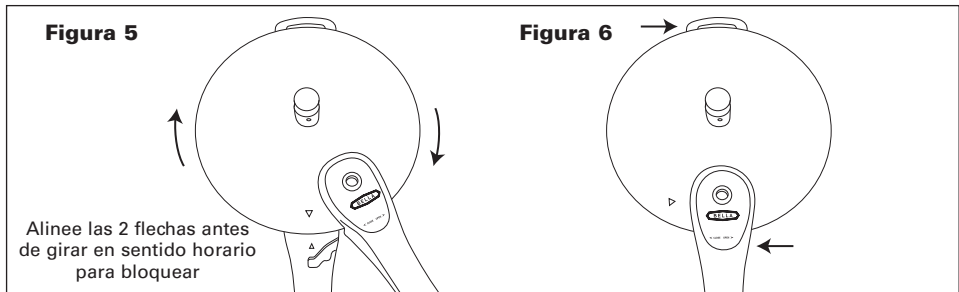
IMPORTANTE: No llene la cacerola de cocción por encima de la mitad de su capacidad cuando cocina a presión alimentos que se expanden: arroz, frijoles secos, granos y legumbres.

IMPORTANTE: Agregue al menos 1 taza (8 oz [237 ml]) de líquido a la cacerola de cocción cuando cocina a presión.

2. **PRECAUCIÓN:** Nunca ponga en funcionamiento el electrodoméstico cuando esté vacío. No cocine cuando el contenido de los alimentos es inferior a 1/3 de la capacidad de la cacerola de cocción. (Vea la Figura 4).
3. Realice una inspección visual del tubo de ventilación de vapor de la tapa para detectar obstrucciones antes de utilizar la olla a presión.
4. Para examinar el tubo de ventilación del vapor, desenrosque la válvula de liberación de presión que se encuentra en la parte superior de la tapa. (Vea las Instrucciones de cuidado y limpieza, Figura 7)
5. Dé vuelta la tapa y quite cuidadosamente la cubierta del filtro de la parte interna de la tapa. (Vea la Figura 1).
6. Sostenga la tapa hacia arriba a contraluz para confirmar que la ventilación no tiene obstrucciones. Si el tubo de ventilación de vapor está obstruido, utilice un limpiador de tubos o un cepillo pequeño para quitar la obstrucción antes de utilizar la olla a presión. Cambie la válvula de liberación de presión y la tapa del filtro antes de utilizar la unidad.
7. Verifique que la junta esté colocada de manera firme dentro de los agarres en la parte interna de la tapa. (Para obtener más información sobre el armado, vea las Instrucciones de cuidado y limpieza)
8. Cuando coloque la tapa sobre la cacerola de cocción para bloquearla, gírela de manera que el mango superior de la tapa quede a la derecha del mango inferior de la cacerola de cocción. (Vea la Figura 5). Gire el mango superior de la tapa en sentido horario hasta que la tapa y los mangos de la base de cocción estén bloqueados y estén perfectamente alineados. (Vea la Figura 6).

IMPORTANTE: Si la válvula de liberación de presión no está cerrada o armada correctamente, la olla a presión no generará presión adecuada, los líquidos se podrían evaporar y quemar los alimentos.





9. Cuando se alcanza la presión/temperatura adecuada, se escuchará un leve silbido del vapor proveniente de la válvula de seguridad del mango. La válvula de seguridad comenzará a subir y bajar a medida que aumenta la presión.
10. Después de aproximadamente 10 minutos (o más, según la cantidad de agua que agregue a la cacerola de cocción), la válvula de seguridad se elevará a su posición más alta; en este punto, comience a contar el tiempo de cocción a presión de la receta.
PRECAUCIÓN: Mantenga las manos y el rostro alejados de la válvula de liberación de presión y la válvula de seguridad cuando el electrodoméstico está en funcionamiento. Durante el uso, es posible que la olla despida agua y vapor calientes.
PRECAUCIÓN: CUANDO COCINE BAJO PRESIÓN, NO DEBE ABRIR LA OLLA A PRESIÓN CUANDO SE ALCANCE LA PRESIÓN. NO INTENTE HACER FUERZA PARA ABRIR LA TAPA.
11. Cuando haya alcanzado el tiempo de cocción a presión, se liberará el vapor de manera natural o rápidamente.
12. Deje que la presión LIBERE EL VAPOR NATURALMENTE (liberar el vapor y enfriar con el tiempo) o con una mano cubierta con una manopla, utilice un utensilio para subir la válvula de liberación de presión a la posición LIBERACIÓN RÁPIDA del vapor restante.
13. Después de liberar todo el vapor, la válvula de seguridad bajará ubicándose dentro de la tapa. En este punto, podrá quitar la tapa. Sostenga con una mano el mango de la cacerola de cocción de manera firme, tome el mango de la tapa con la otra mano y gire en sentido antihorario para desbloquear.
ADVERTENCIA: Tenga cuidado al abrir la tapa. El vapor se escapa apenas abre la tapa. Quite la tapa y aléjela de usted en posición inclinada para evitar el vapor. No coloque nunca su rostro o sus manos encima de la olla a presión cuando quita la tapa. Use siempre manoplas cuando manipula la cacerola de cocción caliente.
PRECAUCIÓN: Después de preparar sopa y caldo, espere varios minutos antes de liberar la presión y quitar la tapa para asegurarse de que el líquido caliente no hierva y se vuelque.
14. Verifique los alimentos para ver si se cocinaron lo suficiente. De lo contrario, vuelva a colocar la tapa y haga que se bloquee en su lugar según las Instrucciones de funcionamiento anteriores. Cocine a presión durante 2 a 3 minutos más, de ser necesario.
15. Deje enfriar el electrodoméstico antes de limpiar. Siga las Instrucciones de cuidado y limpieza que se describen en este Manual de instrucciones.

Dorar/Sellar

- Dorar/sellar alimentos en la cacerola de cocción aporta exquisitez y sabor a los alimentos cocinados a presión; la cocción en la misma olla significa limpieza fácil.
ADVERTENCIA: No fría en abundante aceite ni a presión en la olla a presión, independientemente de si la tapa está o no colocada. ESTO ES PELIGROSO Y PUEDE OCASIONAR INCENDIO Y DAÑOS GRAVES.
ADVERTENCIA: Asegúrese de haber quitado la tapa cuando DORE alimentos.
- Para obtener mejores resultados, seque los alimentos con toallas de papel y córtelos en trozos pequeños y uniformes. Dore los alimentos en tandas pequeñas.
- Agregue la cantidad adecuada de aceite (o aceite en aerosol antiadherente), según se indique en la receta.
- Quite la tapa al dorar o sellar.
- Caliente destapado a fuego medio durante 2 a 4 minutos. Cuando los alimentos estén sellados como usted desee, agregue el resto de los alimentos y continúe cocinando con la olla a presión según las instrucciones de la receta.
- Quite la olla a presión del calor y déjela enfriar ligeramente antes de incorporar el líquido a la cacerola de cocción.

Cocción al vapor

- La presión hace hervir rápidamente el líquido de cocción para cocinar los alimentos al vapor.
- Para cocinar al VAPOR alimentos como verduras, coloque una canasta o rejilla de bambú o plástico, resistente al calor, sin metal para cocción al vapor (NO INCLUIDA) en la cacerola de cocción y agregue 1 taza (250 ml) de agua o líquido de cocción.
- Coloque los alimentos sobre la rejilla. Para obtener mejores resultados, no sobrecargue ni llene la parte inferior con alimentos.

Verduras

- Pele las verduras cuando fuera necesario o límpielas bien. Recuerde que las verduras duras como las papas y la remolacha mantienen mejor su forma cuando se les deja la piel intacta.
- Podrá cocinar la verdura entera o cortada en trozos. Cuanto más grandes sean los trozos, más tiempo tomará la cocción.
- Las verduras con el mismo tiempo de cocción se deben cocinar juntas.
- Debido a que las verduras de rápida cocción como zapallitos, espárragos y brócoli se cocinan en exceso con facilidad, es conveniente cocinarlos al vapor en lugar de cocinarlos a presión.

Consejos generales para cocinar frijoles a presión

- Los frijoles cocidos a presión se ponen tiernos en tiempo récord. Pero debido a que algunas variedades no mantienen su forma, utilice frijoles cocidos al vapor para sopas o guisos en lugar de utilizarlos para ensaladas de frijoles.
- Coloque los frijoles secos en un escurridor o colador y enjuague bien. Deseche los frijoles rotos.
- Es opcional humedecer previamente los frijoles, pero permite cocinarlos de manera uniforme y ayuda a que se digieran mejor. Si el tiempo lo permite, déjelos en remojo en gran cantidad de agua y tapados, durante 6 a 8 horas o toda la noche. Si no tiene tiempo, remójelos en un recipiente grande con agua tibia y tapado, durante una hora antes de cocinar. Si aún debe hacerlo más rápido, remójelos de 15 a 30 minutos en agua hirviendo. Los tiempos de cocción reales variarán según la frescura de los frijoles.
- Escurra y enjuague. Cocine los frijoles en agua potable. Agregue siempre aceite vegetal para reducir el exceso de espuma.
- Si lo desea, agregue tomates, cebolla, hojas de laurel y ajo para aportar sabor a los frijoles y el caldo.
- Debido a que el tiempo necesario para cocinar los frijoles varía según cada caso, podrá elegir cocinar la mayor parte a presión y, luego, terminar de cocinar los frijoles sin la tapa. Incorpore más agua de ser necesario si el líquido de cocción se torna muy espeso.
- Agregue sal durante los últimos minutos de cocción. Si agrega sal al principio, podría endurecer la piel de los frijoles y evitar que se cocinen de forma adecuada.
- Coloque los frijoles en un colador y pase a un recipiente grande. Escurra los frijoles. Quite las hojas de laurel. Si lo desea, reserve líquido de cocción para utilizar como base de cocción para sopas y guisos.
- Los frijoles que sobran se pueden congelar en tamaños de porciones convenientes.

Precauciones al cocinar frijoles

- Cuando cocine los frijoles solos (y no en una sopa o guiso), no supere la mitad de la capacidad de la cacerola de cocción.
- PARA CONTROLAR LA ESPUMA DE LA COCCIÓN DE LOS FRIJOLES, AGREGUE SIEMPRE 2 CUCHARADITAS DE ACEITE POR CADA TAZA (170 g) DE FRIJOLES SECOS AL LÍQUIDO DE COCCIÓN.
- Tenga mucho cuidado al quitar la tapa, ya que habrá gran cantidad de vapor en la olla a presión.
- Limpie bien la válvula de liberación de presión y la junta después de cocinar frijoles.

Arroz cocido a presión

Podrá cocinar hasta 5 tazas y 1/4 (970 g) de arroz blanco crudo en la olla a presión de 5 cuartos (4,7 L). Puede utilizar diversas variedades de arroz, por ejemplo, basmati, arroz salvaje, arroz negro, arborio, risotto, arroz integral, granos largos y cortos.

No utilice la olla a presión para cocinar arroz instantáneo. (Para conocer los tiempos aproximados y las cantidades de arroz y agua/líquido de cocción, consulte la TABLA DE COCCIÓN DE ARROZ a continuación).

Tabla de cocción de arroz

IMPORTANTE: Agregue una cucharada de aceite (vegetal, de oliva, de sésamo) para reducir el exceso de espuma.

NOTA: Utilice una taza medidora para medir el arroz y el agua.

ARROZ BLANCO CRUDO tazas (g)	AGUA tazas (ml)	ARROZ INTEGRAL CRUDO tazas (g)	AGUA tazas (ml)
1,5 (280)	2,25 (530)	1,5 (280)	2,5 (590)
2,25 (420)	3,5 (830)	2,25 (420)	3,75 (890)
3 (550)	4,5 (1060)	3 (550)	4,75 (1120)
3,75 (690)	5,5 (1300)	3,75 (690)	5,75 (1360)
4,5 (830)	6,75 (1600)	4,5 (830)	7 (1660)
5,25 (970)	7,75 (1830)	5 (930)	8 (1890)

*Los tiempos de cocción reales pueden variar según la edad del grano y las preferencias personales.

Granos cocidos a presión

Los granos enteros se cocinan tan rápidamente en la olla a presión que pueden formar parte de su alimentación habitual. Recuerde lo siguiente:

- El tiempo varía según cada lote de granos, la edad y las condiciones de almacenamiento. Recuerde que los granos enteros como los granos de trigo y el arroz integral son algo duros, incluso cuando están bien cocidos.
- Los granos con el mismo tiempo de cocción se deben cocinar juntos.
- Los granos que sobran se pueden congelar en tamaños de porciones convenientes. Descongélelos en un horno de microondas.

Precauciones al cocinar granos

- Cuando cocine los granos secos solos (y no en una sopa o guiso), nunca llene la olla a presión por encima de la línea indicadora de la mitad de la capacidad de la cacerola de cocción.
- PARA REDUCIR EL EXCESO DE ESPUMA A MEDIDA QUE SE COCINAN LOS GRANOS, AGREGUE SIEMPRE 1 CUCHARADA DE ACEITE POR CADA TAZA (170 g) DE GRANOS SECOS.
- No cocine más de 2 tazas y un cuarto (380 g) de granos secos a la vez.
- Limpie bien la válvula de liberación de presión, el tubo de ventilación, la válvula de seguridad y la junta después de cocinar los granos.

Instrucciones de mantenimiento para el usuario

Este electrodoméstico requiere poco mantenimiento. No contiene piezas que puedan ser reparadas por el usuario. Cualquier tipo de mantenimiento, aparte de la limpieza, para el que sea necesario desarmar el aparato, debe ser realizado por un técnico autorizado para reparar electrodomésticos.

Instrucciones de cuidado y limpieza

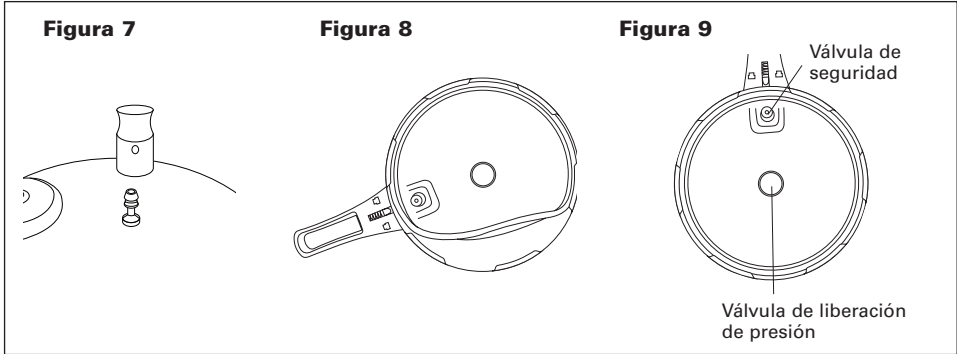
1. Deje enfriar la olla a presión a temperatura ambiente antes de limpiar.
2. Lave la cacerola de cocción con agua tibia y jabón y una esponja o paño limpio y suave. Enjuague con agua limpia y seque completamente.
3. Retire y desarme la tapa.
4. Desenrosque la válvula de liberación de presión de la tapa. (Vea la Figura 7).
5. Quite con cuidado la junta de los agarres en la parte interna de la tapa. (Vea la Figura 8). Controlela de forma periódica para asegurarse de que esté limpia, flexible y no esté quebrada o rota. Si está dañada, no utilice este electrodoméstico.
6. Lave la junta en agua tibia y jabón. Enjuague con agua limpia y seque completamente.
7. Lave la parte interna de la tapa con un paño o esponja húmeda y con jabón. Utilice un pincel para quitar los residuos de aceite, de ser necesario. Seque con un paño limpio humedecido.
8. Verifique si hay obstrucciones. Si fuera necesario, utilice un cepillo pequeño o limpiador de tubos para limpiar la válvula de liberación de presión y la válvula de seguridad. (Vea la Figura 9).

9. Después de limpiar, sujete la junta limpia debajo de los agarres en la parte interna de la tapa. (Vea la Figura 8).

IMPORTANTE: Siempre debe colocar correctamente la junta en la parte inferior de la tapa.

ADVERTENCIA: La válvula de liberación de presión y la válvula de seguridad SE DEBEN armar nuevamente de forma correcta para garantizar la seguridad y el rendimiento óptimo de su olla a presión. (Vea la Figura 7).

10. Nunca utilice detergentes químicos, esponjas metálicas o polvos abrasivos sobre ninguna de las partes o los componentes.



Instrucciones de almacenamiento

1. Deje enfriar la unidad por completo. Asegúrese de que todas las piezas estén limpias y secas antes de guardarlas. Arme la tapa antes de guardarla.
2. Guarde la olla a presión en su caja original o cubierta en un lugar limpio y seco.
3. Para evitar aromas, moho y olores desagradables, no guarde nunca la olla a presión cerrada con la tapa bloqueada en su lugar. Empaque y guarde la olla a presión con la tapa boca arriba sobre la cacerola de cocción.



Garantía limitada de DOS AÑOS

Mediante la presente, SENSIO Inc. garantiza que, durante el plazo de **DOS AÑOS** a partir de la fecha de compra, este producto no presentará defectos mecánicos en el material ni en la mano de obra, y durante 90 días, no los presentará en las piezas no mecánicas. A su entera discreción, SENSIO Inc. reparará o reemplazará el producto que resulte defectuoso, o emitirá un reembolso por el producto durante el plazo de garantía.

Esta garantía es válida únicamente para el comprador minorista original a partir de la fecha de compra minorista inicial y no es transferible. Conserve el recibo de compra original, ya que se exige una prueba de compra para obtener la validación de la garantía. Las tiendas minoristas no tienen derecho a alterar, modificar ni corregir de ninguna manera los términos y condiciones de la garantía.

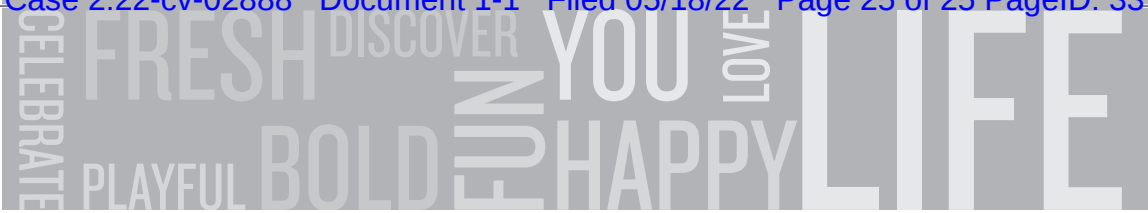
EXCLUSIONES:

La garantía no cubre el desgaste normal de las piezas ni el daño ocasionado por cualquiera de las siguientes causas: uso negligente del producto, uso de un voltaje o corriente incorrectos, mantenimiento de rutina inadecuado, uso contrario al de las instrucciones de funcionamiento, desarmado, reparación o alteración a cargo de personas que no sean miembros del personal calificado de SENSIO Inc. Asimismo, la garantía no cubre actos de la naturaleza, como incendios, inundaciones, huracanes o tornados.

SENSIO Inc. no asumirá responsabilidad por daños incidentales o resultantes ocasionados por la violación de cualquier garantía expresa o implícita. Salvo en la medida en que lo prohíban las leyes aplicables, cualquier garantía implícita de comerciabilidad o aptitud para un propósito particular se limita temporalmente a la duración de la garantía. Algunos estados, provincias o jurisdicciones no permiten la exclusión ni la limitación de daños incidentales o resultantes, o limitaciones sobre la duración de una garantía implícita y, por lo tanto, es posible que las exclusiones o limitaciones mencionadas no le correspondan. La garantía cubre derechos legales específicos que pueden variar de un estado, una provincia o una jurisdicción a otros.

CÓMO OBTENER EL SERVICIO DE GARANTÍA:

Debe comunicarse con el Servicio de atención al cliente a nuestro número telefónico gratuito: 1-866-832-4843. Un representante del Servicio de atención al cliente intentará resolver los problemas referidos a la garantía por teléfono. Si este no puede resolver el problema, le proporcionarán un número de caso y le solicitarán que devuelva el producto a SENSIO Inc. Adhiera una etiqueta al producto que incluya: su nombre, dirección, número telefónico de contacto durante el día, número de caso y descripción del problema. Además, incluya una copia del recibo de compra original. Envuelva cuidadosamente el producto etiquetado con el recibo de compra, y envíelo (con el envío y el seguro prepagados) a la dirección de SENSIO Inc. SENSIO Inc. no asumirá obligación ni responsabilidad alguna por el producto devuelto que esté en el trayecto hacia el Centro de servicio al cliente de SENSIO Inc.



bellahousewares.com



BellaLife



BellaLife



BellaLifestyle



BellaLifestyle

For customer service questions or comments

Dudas o comentarios contactar el departamento de servicio al cliente

1-866-832-4843

www.sensioinc.com

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Todos los derechos reservados.

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

EDITH LOPEZ

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Marc Grossman, Esq. MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC: 100 Garden City Plaza, Suite 500, Garden City, NY 11530, (516) 741-5600

DEFENDANTS

SENSIO, INC. d/b/a BELLA

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

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

Attorneys (If Known)

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

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

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

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

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

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

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C. § 1332. Brief description of cause: Injuries caused by a defective pressure cooker

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: [X] Yes [] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE: May 18, 2022 SIGNATURE OF ATTORNEY OF RECORD: /s/ Marc Grossman

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

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

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of New Jersey

EDITH LOPEZ

Plaintiff(s)

v.

SENSIO, INC. d/b/a BELLA

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) SENSIO, INC. d/b/a BELLA
610 East River Road, Ste. 260
New Glasgow, Nova Scotia B2H 3S2

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:

Marc Grossman, Esq.
MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC
100 Garden City Plaza, Suite 500
Garden City, NY 11530
516-741-5600 / 516-741-0128 (fax)

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

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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:

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

EDITH LOPEZ , an individual,	:	
	:	
Plaintiff,	:	Civil Action No.:
	:	
v.	:	
	:	
SENSIO, INC. d/b/a BELLA ,	:	
a Canadian Corporation,	:	
	:	
Defendant.	:	

NOTICE OF INTERESTED PARTIES

TO: THE COURT AND ALL PARTIES OF RECORD:

The undersigned and co-counsel, Adam J. Kress, Esq. certify that the following listed party (or parties) may have a pecuniary interest in the outcome of this case. These representations are made to enable the Court to evaluate possible disqualification or recusal.

PARTY:	CONNECTION/INTEREST:
1) Edith Lopez	Plaintiff
2) Johnson Becker, PLLC	Counsel for Plaintiff
3) Milberg Coleman Bryson Phillips Grossman, PLLC	Counsel for Plaintiff
4) Sensio, Inc. d/b/a Bella	Defendant

Should other parties be added to this lawsuit who thereby become financially interested in the outcome of this litigation, Plaintiff will promptly file an amended certificate with the Clerk identifying such interested parties.

Respectfully submitted,

**MILBERG COLEMAN BRYSON PHILLIPS
GROSSMAN, PLLC**

Date: May 18, 2022

/s/ Marc Grossman, Esq.

Marc Grossman, Esq.
100 Garden City Plaza, Suite 500
Garden City, NY 11530
516-741-5600 / 516-741-0128 (fax)
mgrossman@milberg.com

In association with:

JOHNSON BECKER, PLLC

Adam J. Kress, Esq.
Pro Hac Vice to be filed
444 Cedar Street, Suite 1800
St. Paul, MN 55101
(612) 436-1800
akress@johnsonbecker.com

Attorneys for Plaintiff