

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

J.E.B., a minor, by and through her mother,  
MYESHA MAGGIT, individually, and as  
custodial parent and next friend,

Case No.: 1:25-cv-03028

Plaintiff,

v.

THE STEELSTONE GROUP, LLC d/b/a  
GOURMIA, a New York Limited Liability  
Company,

Defendant.

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**COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff, **J.E.B.** (hereinafter, “J.E.B.” or “Minor Plaintiff”), a minor, by and through her natural mother, **MYESHA MAGGIT** (“Ms. Maggit”) (collectively, “Plaintiffs”), individually, and custodial parent and next friend, by and through their undersigned counsel, **JOHNSON BECKER, PLLC** and **MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC**, hereby submit the following Complaint and Demand for Jury Trial against Defendant **THE STEELSTONE GROUP, LLC d/b/a GOURMIA** (hereinafter referred to as “Gourmia” or “Defendant”) and allege the following upon personal knowledge and belief, and investigation of counsel:

**NATURE OF THE CASE**

1. Gourmia, designs, markets, imports, distributes and sells a wide-range of consumer kitchen products, including the subject “Gourmia Multi-Mode Smartpot Pressure Cooker,” which specifically includes Model No. GPC655, that is at issue in this case (hereinafter, “Subject Pressure Cooker”).

2. Defendant touts the “safety”<sup>1</sup> of its pressure cookers, and states that they cannot be opened while in use. Despite Defendant’s claims of “safety,” it designed, manufactured, marketed, imported, distributed and sold, both directly and through third-party 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.

4. Despite Defendant’s claims that the Subject Pressure came equipped with a “[p]atented 12-level lid safety lock system [which] ensures safety while pressure cooker is in-use”<sup>2</sup> and that the lid of the pressure cooker “cannot be opened” prematurely,<sup>3</sup> the lid was removed while the pressure cooker retained pressure, causing J.E.B. serious and life-altering bodily injuries and damages.

5. 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.

6. Defendant ignored and/or concealed its knowledge of these defects in its pressure cookers from the Plaintiff in this case, as well as the public in general, in order to continue generating a

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<sup>1</sup> See, e.g. Gourmia Pressure Cooker Owner’s Manual. (e.g., pg. 14 “The lid cannot be opened until the pressure is fully released – do not attempt to force it open.”). A copy of the Owner’s Manual is attached hereto as “Exhibit A.”

<sup>2</sup> See <https://www.gourmia.com/item.asp?item=10271> (last accessed June 3, 2024).

<sup>3</sup> See Ex. A at p. 14.

profit from the sale of said pressure cookers, demonstrating a callous, reckless, willful, depraved indifference to the health, safety and welfare of J.E.B. and consumers like her.

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

**PLAINTIFFS J.E.B. & MYESHA MAGGIT**

8. Plaintiff, J.E.B. is a minor, and brings this action through her natural mother, Myesha Maggit. J.E.B and Ms. Maggit are domiciled in the City of Jacksonville, County of Onslow, State of North Carolina; and have been from the date of her injuries through the present date. Plaintiffs are therefore residents and citizens of the State of North Carolina for purposes of diversity pursuant to 28 U.S.C. § 1332.

9. On or about September 6, 2022, J.E.B. suffered serious, substantial, life-altering 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. The incident occurred as a result of the failure of the pressure cooker's supposed safety features, which purport to keep the consumer safe while using the pressure cooker. In addition, the incident occurred as a result of Defendant's failure to redesign the pressure cooker, despite the existence of economical, safer alternative designs; as well as to ensure that pressure cooker complied with applicable industry standards, UL 136 and/or 1026.

**DEFENDANT THE STEELSTONE GROUP, LLC d/b/a GOURMIA**

10. Defendant designs, manufactures, markets, imports, distributes and sells a variety of consumer kitchen products including pressure cookers, air fryers, coffee machines, and indoor grills, amongst others.

11. Defendant Gourmia is a New York domestic limited liability corporation with its principal

place of business at 3611 14<sup>th</sup> Avenue, Suite 540, Brooklyn, New York 11218. The sole member of The Steelstone Group LLC is HEB NJ LLC. The members of HEB NJ, LLC are Naftali & Esther Giegeleisen, who are residents of the State of New York. Defendant is, therefore, a citizen of the State of New York for purposes of diversity jurisdiction as prescribed by 28 U.S.C. § 1332.

### **JURISDICTION AND VENUE**

12. 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.

13. Plaintiff, J.E.B. is a minor, and brings this action through her natural mother, Myeshia Maggit. J.E.B and Ms. Maggit are domiciled in the City of Jacksonville, County of Onslow, State of North Carolina; and have been from the date of her injuries through the present date. Plaintiffs are therefore residents and citizens of the State of North Carolina for purposes of diversity pursuant to 28 U.S.C. § 1332.

14. Defendant Gourmia is a New York domestic limited liability corporation with its principal place of business at 3611 14<sup>th</sup> Avenue, Suite 540, Brooklyn, New York 11218. The sole member of The Steelstone Group LLC is HEB NJ LLC. The members of HEB NJ, LLC are Naftali & Esther Giegeleisen, who are residents of the State of New York. Defendant is, therefore, a citizen of the State of New York for purposes of diversity jurisdiction as prescribed by 28 U.S.C. § 1332.

15. Venue is proper in this Court pursuant to 28 U.S.C. § 1391 all or a substantial part of the events or omissions giving rise to this claim occurred in this district.

16. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391 because Defendant is a resident of this District and have sufficient minimum contacts with the State of New York and intentionally avails itself of the markets within New York through the promotion, sale, marketing, and distribution of it's products.

## **FACTUAL BACKGROUND**

### **I. THE SUBJECT PRESSURE COOKER & DEFENDANT’S UNTENABLE CLAIMS OF SAFETY**

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

18. Defendant warrants, markets, advertises and sells its pressure cookers as a means of “completely safe cooking,”<sup>4</sup> allowing consumers to cook meals “70% faster while retaining more flavor and nutrients so you get more out of your meals.”<sup>5</sup>

19. To further propagate its message, Defendant has utilized numerous media outlets including, but not limited to, infomercials, social media websites such as YouTube, and third-party retailers.

20. In the User Manual accompanying each of Gourmia’s Model GPC-655 and GPC-855 pressure cookers, Gourmia asks consumers to “read all safety instructions thoroughly to ensure safe usage at all times.”<sup>6</sup> Unfortunately for consumers, Gourmia’s pressure cookers are defectively and negligently designed and manufactured by the Defendant, and their purported “safety” features fail to protect consumers from harm even when all instructions are followed.

21. Typically speaking, a pressure cooker’s lid and gasket work together to create an airtight seal, which allows pressure to build within the pressure cooker. When working correctly, the unit should pressurize and complete a cooking cycle without any incident.

22. However, if this seal breaks before the pressure inside the unit has been released, the contents will be forcefully expelled from cooker and onto the operator and others in the surrounding area. The extent to which this will be harmful to the consumer depends on the nature of the contents and the level of the liquid in the cooker. The stored internal energy of heated water

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<sup>4</sup> See, e.g. <https://www.gourmia.com/item.asp?item=10044> (last accessed June 3, 2024).

<sup>5</sup> See, e.g. <https://www.gourmia.com/item.asp?item=10272> (last accessed June 3, 2024).

<sup>6</sup> See Ex. A, p. 3.

is proportional to the volume, so a full pot of soup, for example, will be nearly twice explosive as a half pot.

23. Electric pressure cookers utilize a variety of safety features to prevent these types of incidents from occurring. A well-designed and manufactured pressure cooker should not be able to pressurize unless the lid of the unit is correctly closed, sealed, and locked.

24. Furthermore, the lid of a well-designed and manufactured pressure cooker should not come off the base of the pressure cooker while the unit retains pressure. It should not be possible for the lid to spontaneously explode off of the unit, and any locking mechanism utilized by the pressure cooker should prevent the lid from being intentionally removed while there is still pressure in the unit.

25. Not only should the lid not “unlock” before all pressure has been released, but the consumer should not be able to override the safety features and force the lid open either. UL 136, which governs safety standards for pressure cookers, states that a pressure cooker’s lid and interlock system should be able to pass a “torque test” – the lid and interlock system should be able to stay closed even when 100 pound-inches of force is applied to the outermost edge of the lid.

26. Electric pressure cookers, like the Subject Pressure Cooker and other Gourmia pressure cookers, utilize a “lid interlock system” which is intended to prevent premature opening – whether spontaneous, unintentional, or by force.

27. A lid interlock system generally incorporates a series of locking tabs or flanges and an interlock. Pressure cookers utilizing this system will have a number locking tabs or flanges on both the lid and the base of the pressure cooker. When the lid is placed on the unit and rotated shut, the tabs on the lid slide underneath the tabs on the base, securing the lid to the base. If the pressure cooker is well-designed and manufactured, the unit should not be able to pressurize unless and until the tabs on the lid have slid completely underneath the tabs on the base.

28. The pressure cooker also has an interlock which connects the lid's float valve with a sliding mechanism. As the pressure rises in the unit, the float valve rises, locking the lid into place. The float valve should not drop and unlock the lid until the internal pressure has been released.

29. The lids of improperly designed pressure cookers, such as Gourmia pressure cookers and the Subject Pressure Cooker, can explosively separate from the base due to a weak interlock system which fails to comply with recommended safety standards.

30. There are a variety of design defects that can cause this to occur. The type of metal used, the size and shape of the flanges, an unprotected float valve, or locking pins that are too thin or short can all result in a weak interlock system that will fail to operate as intended, putting innocent consumers at risk.

31. Manufacturing defects can also lead to weak interlock systems. Variations and deviations in size, length, and coating thickness can all play a part in whether or not the interlock system works to properly lock the pressure cooker and keep it locked.

32. Gourmia represents that its pressure cookers come equipped with the safety features described above and claims that these features will protect the consumer and prevent users from intentionally or inadvertently opening the pressure cooker early.

33. For example, Gourmia's website boasts the following safety features:

- a. SAFETY LOCK SYSTEM: Patented 12-level lid safety lock system ensures safety while pressure cooker is in use.<sup>7</sup>
- b. From our patented 12-level lid safety lock system to our precise pressure monitoring and flavor enhancing system, we've designed our pressure cookers to give you delicious results every time.<sup>8</sup>

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<sup>7</sup> See <https://www.gourmia.com/item.asp?item=10271> (last accessed June 3, 2024).

<sup>8</sup> *Id.*

34. The User Manual further represents that, while the pressure cooker is cooking with pressure, the lid will be locked and the consumer will not be able to open the pressure cooker until all the pressure has been released:

***NOTE: For the duration of time the unit is cooking with pressure, and until the pressure is released, the Float Valve will be raised and the lid is locked. NEVER ATTEMPT TO OPEN THE LID FOR THE DURATION OF THE PRESSURE COOKING TIME.***

Exhibit A, p. 11

***Note: You can only open the lid once the pressure is released (see page 12)***

Exhibit A, p. 11

**WARNING:**

- The lid cannot be opened until the pressure is fully released – do not attempt to force it open.
- The lid is very hot during and after use- do not touch any of the metal parts.

Exhibit A, p. 14

Lid will not open

Pressure cooker is still pressurized.

The Float Valve at is stuck in the locked (up) position.

Exhibit A, p. 20

35. By reason of the forgoing acts or omissions, the above-named Plaintiff 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.



36. However, Plaintiff's pressure cooker was seemingly able to pressurize, even though the lid's locking mechanisms were not properly engaged. As a result, when Plaintiff interacted with the unit's lid, the lid exploded off the base and hot contents were sprayed all over Plaintiff, as well as her kitchen table and floors.

37. Had said safety features worked as Defendant intended, the Subject Incident would have been avoided. The Subject Pressure Cooker would not have been able to pressurize unless the lid was properly placed and locked, and the lid would not have been removable until the unit depressurized.

## **II. OTHER INCIDENTS**

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

39. Plaintiff is not the first, nor last, person to be injured by a malfunctioning Gourmia pressure cooker. There have been reports from multiple people, in multiple states, of other similar occurrences resulting from a defective Gourmia pressure cooker. For example:

- a. Multiple lawsuits have been filed in State and District Courts throughout the United States alleging the failure of a Gourmia Pressure Cooker Model No. GPC655 and other Gourmia pressure cooker models with the same or similar supposed safety features and design defects. Specifically, see the following:

- i. *Janice Elaine Carnahan v. The Steelstone Group, LLC d/b/a Gourmia* (Filed in the Eastern District of New York, December 1, 2020) ("On or about January 2, 2019, Plaintiff suffered serious and substantial burn injuries as the direct and proximate result of the [Gourmia Model No. GPC400]'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.”) Plf. Compl. ¶ 8;

- ii. *Marlene McCall v. The Steelstone Group, LLC, d/b/a Gourmia* (Filed in the State Court of Fulton County, State of Georgia, January 29, 2021) (“During the course of the cooking cycle, the top of the [Gourmia Model No. GPC625] pressure cooker suddenly and without warning blew off. As a result, the contents of the pressure cooker were vaporized and splatter over Plaintiff’s chest and abdomen. She suffered serious burns over her chest and abdomen and despite treatment, is now permanently scarred and disfigured.”) Plf. Compl. ¶ 8;
- iii. *Gregory Leffler, et. al. v. The Steelstone Group, LLC d/b/a Gourmia* (Filed in the District Court of Tulsa County, State of Oklahoma, June 28, 2021) (“On or about July 20, 2019, Plaintiffs suffered serious and substantial burn injuries to their upper extremities as the direct and proximate result of the [Gourmia Model No. GPC625]’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.”) Plf. Compl. ¶ 4;
- iv. *Sarah Hawk v. Ollie’s Bargain Outlet, Inc., et. al.* (Filed in the Court of Common Pleas of Allegheny County, Pennsylvania, February 14, 2022) (“On or about August 6, 2021, Plaintiff was using the [Gourmia GPC655 Pressure Cooker] at her home and suffered severe burns when, as a result of the defective design and manufacture of the product, the lid released while under pressure, spraying scalding liquid onto Plaintiff.”) Plf. Compl. ¶ 10;
- v. *Monica Louise Colledge v. The Steelstone Group, LLC d/b/a Gourmia* (Filed in the Eastern District of New York, May 17, 2022) (“On or about June 1, 2020, Plaintiff suffered serious and substantial burn injuries as the direct and proximate result of the [Gourmia Model No. GPC855]’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.”) Plf. Compl. ¶ 8;
- vi. *Ashley Green v. The Steelstone Group, LLC d/b/a Gourmia* (Filed in the Eastern District of Michigan, July 14, 2022) (“On or about August 12, 2020, Plaintiff suffered serious and substantial burn injuries as the direct and proximate result of the [Gourmia Model No. GPC855]’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.”) Plf. Compl. ¶ 8;

- vii. *Candace Waxmunski v. The Steelstone Group, LLC* (Filed in Richmond City Circuit Court, 13<sup>th</sup> Judicial Circuit of Virginia, August 10, 2023) (Complaint not publicly available online);
  - viii. *Anita Johnson v. The Steelstone Group, LLC d/b/a Gourmia* (Filed in the Supreme Court of the State of New York, County of Kings, October 31, 2023) (Complaint not publicly available online);
  - ix. *Candis Rogan v. The Steelstone Group, LLC d/b/a Gourmia* (Filed in the Supreme Court of the State of New York, County of Kings, November 14, 2023) (Complaint not publicly available online); and
  - x. *Holly Roberts v. The Steelstone Group, LLC d/b/a Gourmia* (Filed in the Circuit Court for the City of Richmond, December 27, 2023) (Complaint not publicly available online).
- b. The Consumer Products Safety Commission has also received *at least* one report<sup>9</sup> of other similar incidents stemming from the failure of a Gourmia pressure cooker with the same or similar supposed safety features and design defects, such as the following:
- i. December 4, 2020: (“The pressure cooker was in the "on" position for approximately 30 minutes. It was set by the timer. The metal lid shot straight up in the air and the lining around the lid also flew off. The lid hit the kitchen ceiling and caused an indentation to the plaster. The contents landed on the consumer's arm, back, hair and spread across the kitchen as well (ceiling, counter top, floor). Some of the food landed on the entrance towards the living room. The consumer sustained burns to her back and arms. She applied an ointment to her burns as soon as this happened. She estimates that the pot is used every 2 weeks on average.”)

40. Despite being on notice of these similar incidents, Defendant Gourmia continued to aggressively sell its pressure cookers and promote them as “safe.” Defendant Gourmia consciously and intentionally failed to take any action to recall the product or otherwise inform

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<sup>9</sup> The date listed is the date the report of injury was sent to Defendant, The Steelstone Group, LLC d/b/a Gourmia.

the public about the potential risks and dangers associated with Gourmia pressure cookers, prioritizing profit over customer safety.

41. Plaintiffs used the pressure cooker for its intended purpose of preparing meals, and did so in a manner that was reasonable and foreseeable by the Defendant. Plaintiffs did not misuse the Subject Pressure Cooker, nor did they attempt to defeat the pressure cooker's built in safety mechanisms.

42. However, the aforementioned pressure cooker was defectively and negligently designed and manufactured by the Defendant 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 Plaintiffs, their family, and similar consumers in danger while using the pressure cookers.

43. Defendant'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.

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

45. Defendant's own statements establish that its pressure cookers should be deemed defective and unreasonably dangerous because their lids can be opened while the cookers are still pressurized, despite Defendant's claims to the contrary.

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

47. Defendant knew or should have known that its pressure cookers possessed defects that pose a serious safety risk to Plaintiff and the public. Nevertheless, Defendant continues 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 its pressure cookers.

48. As a direct and proximate result of Defendant's intentional 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, Plaintiffs used an unreasonably dangerous pressure cooker, with resulted in significant and painful bodily injuries to J.E.B.

49. Plaintiff's injuries were the direct and proximate result of Defendant's negligence and wrongful conduct, as described herein. As a result of this conduct, J.E.B. has suffered physical and emotional injuries and damages, including past, present, and future physical and emotional pain and suffering and permanent scarring as a result of the Subject Incident.

50. As a direct and proximate result of Defendant's negligence and wrongful conduct as set forth herein, J.E.B. has incurred, and will continue to incur, the loss of full enjoyment of life and has sustained scarring and disfigurement as a result of the Subject Incident.

51. As a direct and proximate result of Defendant's negligence and wrongful conduct as set forth herein, Plaintiffs has incurred expenses for medical care and treatment as well as other expenses related to the burns J.E.B sustained as a result of the Subject Incident.

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

**CLAIMS FOR RELIEF**

**COUNT I  
STRICT LIABILITY**

53. At the time of J.E.B.'s injuries, Defendant's Pressure Cookers were defective and unreasonably dangerous for use by foreseeable consumers, including Plaintiff.

54. Defendant's Pressure Cookers were in the same or substantially similar condition as when they left the possession of Defendant.

55. Plaintiffs did not misuse or materially alter the Subject Pressure Cooker.

56. Defendant's pressure cookers did not perform as safely as an ordinary consumer would have expected them to perform when used in a reasonably foreseeable way.

57. Further, a reasonable person would conclude that the possibility and serious of harm outweighs the burden or cost of making the Pressure Cookers safe. Specifically:

- a. The pressure cookers designed, manufactured, sold, and supplied by Defendant were defectively designed and placed into the stream of commerce in a defective and unreasonably dangerous condition for consumers;
- b. The seriousness of the potential burn injuries resulting from the product drastically outweighs any benefit that could be derived from its normal, intended use;
- c. Defendant failed to properly market, design, manufacture, distribute, supply, and sell the Pressure Cookers, despite having extensive knowledge that the aforementioned injuries could and did occur;
- d. Defendant failed to warn and place adequate warnings and instructions on the Pressure Cookers;
- e. Defendant failed to adequately test the Pressure Cookers to UL 136 and/or 1026; and
- f. Defendant failed to market an economically feasible alternative design, despite the existence of the aforementioned economical, safer alternatives, that could have prevented the Plaintiff's injuries and damages.

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

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

**COUNT II**  
**NEGLIGENCE**

59. Defendant has a duty of reasonable care to design, , market, and sell non-defective pressure cookers that are reasonably safe for their intended uses by consumers, such as Plaintiffs and their family.

60. Defendant failed to exercise ordinary care in the manufacture, sale, warnings, quality assurance, quality control, distribution, advertising, promotion, sale and marketing of its pressure cookers in that Defendant knew or should have known that said pressure cookers created a high risk of unreasonable harm to the Plaintiff and consumers alike.

61. Defendant was negligent in the design, advertising, warning, marketing and sale of its pressure cookers in that, among other things, it:

- a. Failed to use due care in designing and manufacturing the Pressure Cookers to avoid the aforementioned risks to individuals;
- b. Placed an unsafe product into the stream of commerce;
- c. Defendant failed to adequately test the Pressure Cookers to UL 136 and/or 1026; and
- d. Were otherwise careless or negligent.

62. Despite the fact that Defendant knew or should have known that consumers were able to remove the lid while the Pressure Cookers were still pressurized, Defendant continued to market (and continues to do so) its Pressure Cookers to the general public.

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

**COUNT III**  
**NEGLIGENT DESIGN DEFECT**

63. Defendant is the seller, distributor, marketer, and supplier of the subject Pressure Cookers, which was negligently designed.

64. Defendant failed to exercise reasonable care in designing, developing, inspecting, testing, packaging, selling, distributing, labeling, marketing, and promoting its Pressure Cookers, which were defective and presented an unreasonable risk of harm to consumers, such as the Plaintiff.

65. As a result, the subject Pressure Cookers, including Plaintiffs' Pressure Cooker, contain defects in their design which renders them unreasonably dangerous to consumers, such as the Plaintiff, when used as intended or as reasonably foreseeable to Defendant. The defect in the design allows consumers such as Plaintiffs to open the lid while the unit remains pressurized, despite the appearance that all the pressure has been released from the unit, and causes an unreasonable increased risk of injury, including, but not limited to, first, second and third-degree scald burns.

66. The Plaintiffs in this case used their Pressure Cooker in a reasonably foreseeable manner and did so as substantially intended by Defendant.

67. The Subject Pressure Cooker was not materially altered or modified after being manufactured by Defendant and before being used by Plaintiffs.

68. The design defects allowing the lid to open while the unit was still pressurized directly rendered the Pressure Cookers defective and were the direct and proximate result of Defendant's negligence and failure to use reasonable care in designing, testing, manufacturing, and promoting the Pressure Cookers.

69. As a direct and proximate result of Defendant's negligent design of its Pressure Cookers, the J.E.B. suffered the injuries and damages described herein.



70. Despite the fact that Defendant knew or should have known that consumers were able to remove the lid while the Pressure Cookers were still pressurized, Defendant continued to market (and continues to do so) its Pressure Cookers to the general public.

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

**COUNT IV**  
**NEGLIGENT FAILURE TO WARN**

71. At the time in which the Subject Pressure Cooker was purchased, up through the time J.E.B. was injured, Defendant knew or had reason to know that its pressure cookers were dangerous and created an unreasonable risk of harm to consumers.

72. Defendant had a duty to exercise reasonable care to warn consumers of the dangerous conditions or the facts that made its pressure cookers likely to be dangerous.

73. Namely, Defendant had a duty to inform consumers that its “safety features” do not actually prevent the lid from separating from the base while the unit is pressurized, and that the pressure cooker’s lid *can* be removed with pressure still inside the unit.

74. As a direct and proximate result of Defendant’s negligent failure to warn of the dangers of its pressure cookers, J.E.B. suffered injuries and damages described herein.

75. Despite the fact that Defendant knew or should have known that consumers were able to remove the lid while the Pressure Cookers were still pressurized, Defendant continued to market its Pressure Cookers to the general public (and continues to do so).

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

**COUNT V**  
**BREACH OF IMPLIED WARRANTY OF FITNESS**  
**FOR A PARTICULAR PURPOSE**

76. Defendant manufactured, supplied, and sold its pressure cookers with an implied warranty that they were fit for the particular purpose of cooking quickly, efficiently and safely.

77. Members of the consuming public, including consumers such as the Plaintiffs, were the intended third-party beneficiaries of the warranty.

78. Defendant's pressure cookers were not fit for the particular purpose as a safe means of cooking, due to the unreasonable risks of bodily injury associated with their use.

79. The Plaintiffs in this case reasonably relied on Defendant's representations that its pressure cookers were a quick, effective and safe means of cooking.

80. Defendant's breach of the implied warranty of fitness for a particular purpose was the direct and proximate cause of J.E.B.'s injuries and damages.

81. Plaintiff notified Defendant on or about October 6, 2022 that she had retained counsel to represent her against Defendant for injuries she sustained after using the Subject Pressure Cooker. Notice was given via letter mailed to Defendant at its principal place of business at 3611 14<sup>th</sup> Avenue, Suite 540, Brooklyn, NY 11218.

82. Despite the fact that Defendant knew or should have known that consumers were able to remove the lid while the Pressure Cookers were still pressurized, Defendant continued to market its Pressure Cookers to the general public (and continues to do so).

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

**COUNT VI**  
**PUNITIVE DAMAGES**

83. The acts, conduct, and omissions of the Defendants, as alleged throughout this Complaint, were willful and malicious. It is unconscionable and outrageous that Defendant would risk the health, safety, and well-being of consumers, including the Plaintiffs in this case. Despite their knowledge that the lid could be prematurely removed while the unit remained pressurized, Defendant made conscious decisions not to redesign, despite the existence of an economically feasible, safer alternative design, and not to adequately label, warn or inform the unsuspecting consuming public about the dangers associated with the use of their pressure cookers.

84. Defendant's outrageous conduct rises to the level that Plaintiffs should be awarded punitive damages to deter Defendants from this type of outrageous conduct in the future, as well as to discourage other Defendants from placing profit above the safety of consumers in the United States of America.

85. Prior to and during the manufacturing, sale, and distribution of its pressure cookers, Defendant knew that said pressure cookers were in a defective condition as previously described herein and knew that those who purchased and used their pressure cookers, including Plaintiffs, could experience severe physical, mental, and emotional injuries.

86. Further, Defendant knew that its pressure cookers presented a substantial and unreasonable risk of harm to the public, including Plaintiff, and as such, Defendant unreasonably subjected consumers of said pressure cookers to risk of serious and permanent injury from their use.

87. Despite their knowledge, Defendant, for the purpose of enhancing their profit, knowingly and deliberately failed to remedy the known defects in their pressure cookers, and failed to warn the public, including Plaintiff, of the extreme risk of injury occasioned by said defects inherent in them. Defendant intentionally proceeded with the sale, distribution and marketing of its pressure

cookers knowing these actions would expose consumers, such as the Plaintiffs, to serious danger in order to advance their pecuniary interest and monetary profit.

88. Defendants' conduct was despicable and so contemptible that it would be looked down upon and despised by ordinary decent people and was carried on by Defendants with willful and conscious disregard for the safety of the Plaintiff, her family, and consumers like them, entitling the Plaintiff to punitive damages.

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

### **DEMAND FOR JURY TRIAL**

Plaintiffs demand that all issues of fact of this case be tried to a properly impaneled jury to the extent permitted under the law.

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs demand judgment against the Defendant for damages, including punitive damages, to which they entitled by law, as well as all costs of this action and interest to the full extent of the law, whether arising under the common law and/or statutory law, including:

- a. judgment for Plaintiffs and against Defendant;
- b. damages to compensate J.E.B. and Ms. Maggit for their injuries, economic losses and pain and suffering sustained as a result of the use of the Defendant's Pressure cookers;
- c. pre and post judgment interest at the lawful rate;
- d. Punitive damages on all applicable Counts as permitted by the law;
- e. a trial by jury on all issues of the case; and
- f. for any other relief as this Court may deem equitable and just, or that may be available under the law of another forum to the extent the law of another forum is applied, including but not limited to all reliefs prayed for in this Complaint and in the foregoing

Prayer for Relief.

Respectfully submitted,

**MILBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN, PLLC**

Dated: May 30, 2025

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***Attorneys for Plaintiff***

# **EXHIBIT A**

# Gourmia®



## PRESSURE COOKER

Model# GPC-655

Model# GPC-855

### USER MANUAL

Read this manual thoroughly  
before using and save it for  
future reference

FOR CUSTOMER SERVICE  
QUESTIONS OR COMMENTS  
VISIT US @ GOURMIA.COM  
INFO@GOURMIA.COM  
OR CALL 888.552.0033

Model: GPC-655  
Model: GPC-855  
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www.gourmia.com  
The Steelstone Group  
Brooklyn, NY

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## Welcome to the Convenient World of the *Pressure Cooker* from Gourmia

Enter the magic world of speed cooking with this Gourmia pressure cooker. In just a matter of minutes, you can now serve up the most deluxe dinners. Gone are the days of defrosting and cooking for hours on end.

Why use a pressure cooker you ask?

Advanced technology merges with convenience to bring you and your family the best of all worlds. A pressure cooker functions by trapping and sealing the steam to cook at higher temperatures and faster speeds, while locking in essential nutrients and flavors to ensure healthier, tastier and quicker meals cooking up to 70% faster.

The fresh luscious aroma, and the succulent taste of the food that emerges will leave you wondering how you've managed until now. Its ease of use and many functions ensure that it remains your new go-to appliance. Go ahead, invite those guests! Have them think you've been preparing all day; when the cleanup is done, you'll let them in on your time saving secret.

The pages of this manual offer comprehensive instructions to guide you through the functions and features of the Gourmia pressure cooker. Inside this guide you will also find information on its modes of operation, complete step-by-step instructions for the operation, assembly, cleaning, and maintenance of your appliance.

Please read all safety instructions thoroughly to ensure safe usage at all times.

Thank you for your purchase! We sincerely hope you will enjoy this as well as all the many innovative products brought to you by Gourmia.

## IMPORTANT SAFEGUARDS

Before using the electrical appliance, the following basic precautions should always be followed:

1. This appliance is not intended for use by persons (including children younger than 8) with reduced physical, sensory or mental capabilities, or lack of experience and knowledge, unless they have supervision.
2. Check if the voltage indicated on the appliance corresponds to the local main voltage before you connect the appliance.
3. Do not use with an extension cord. There is a short cord provided specifically to prevent entanglement and similar dangerous scenarios.
4. Do not use the appliance if the plug, the main cord or the appliance itself is damaged. Always make sure that the plug is inserted properly into a wall outlet.
5. Do not operate any appliance with a damaged cord or plug or after the appliance malfunctions, or has been damaged in any manner. Return appliance to the nearest authorized service facility for examination, repair or adjustment.
6. Close supervision is necessary when any appliance is used by or near children. Children should be supervised to ensure that they do not play with the appliance. Cleaning and user maintenance shall not be done by children unless they are older than 8 and supervised.
7. Do not let the cord hang over the edge of table or counter or touch hot surfaces.
8. To protect against electric shock do not immerse cord, plugs, or appliance in water or other liquid. Do not plug in the appliance or operate the control panel with wet hands.
9. Never connect this appliance to an external timer switch or separate remote-control system in order to avoid a hazardous situation. Always attach plug to appliance first, then plug cord in the wall outlet. To disconnect, turn off the appliance, then remove plug from wall outlet.
10. Do not place the appliance on or near combustible materials such as a tablecloth or curtain. The accessible surfaces may become hot during use. Do not place on or near a hot gas or electric burner, or in a heated oven.
11. Do not place the appliance against a wall or against other appliances. Leave at least 4 inches of free space on the back and sides and 4 inches of free space above the appliance. Do not place anything on top of the appliance.
12. Do not use the appliance for any other purpose than described in this manual. The use of accessory attachments not recommended by the appliance manufacturer may cause injuries.
13. Do not let the appliance operate unattended. Extreme caution must be used when moving an appliance containing hot oil or other hot liquids.
14. Do not use outdoors.
15. Do not touch the hot surfaces, use handles and knobs only. Keep your hands and face at a safe distance from the steam and from the air outlet openings. Also be careful of hot steam and air when you remove the cover from the appliance.
16. After using the appliance, the inside of the metal lid is very hot. Unplug from outlet when not in use and before cleaning. Allow to cool before putting on or taking off parts, and before cleaning the appliance.
17. Immediately unplug the appliance if you see dark smoke coming out of the appliance. Wait for the smoke emission to stop, before you remove the pan from the appliance.
18. Do not alter or tamper with any component or accessory included with this unit. Do not use with any accessory that was not designed specifically for this unit.

18. FOR HOUSEHOLD USE ONLY.

## SAVE THESE INSTRUCTIONS

FOR CUSTOMER SERVICE VISIT US @ GOURMIA.COM OR CALL 888.552.0033

**TABLE OF CONTENTS**

**Know Your Pressure Cooker .....6**

**When Using Your Pressure Cooker...8**

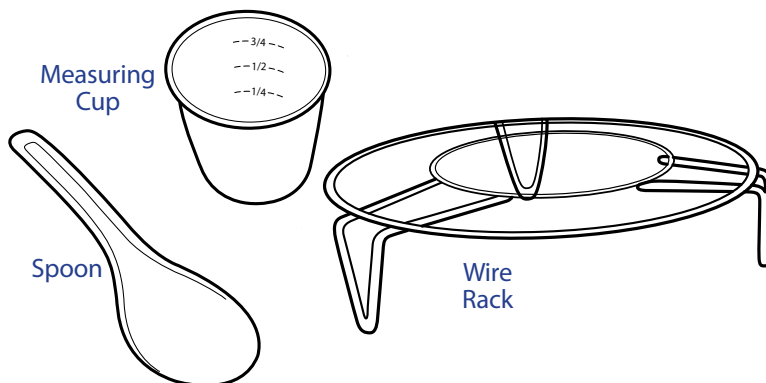
**Using Your Pressure Cooker .....9**

**Charts & Tips..... 14**

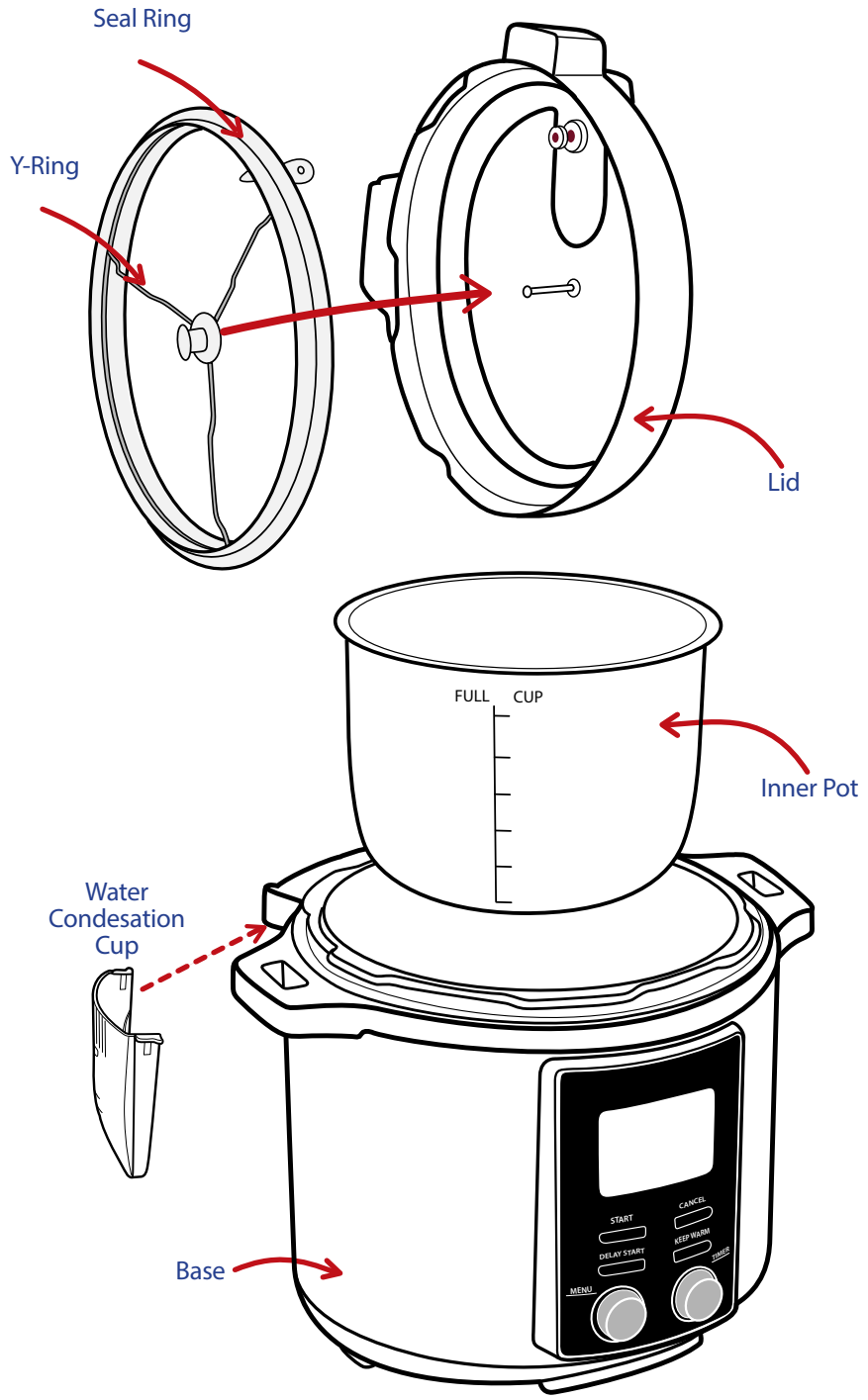
**Troubleshooting.....20**

**Cleaning & Maintenance.....22**





**KNOW YOUR PRESSURE COOKER**



## When Using Your Pressure Cooker:

- Ensure that the appliance is resting on a flat, heat resistant surface before use
- A minimum of four inches around the appliance should remain clear of all objects including walls, cupboards, curtains etc. while it is in operation. The lid should be clear of all objects as well.
- Always attach the cord to the appliance before inserting into the socket. To disconnect, ensure the appliance is set to the off position and then remove the cord from the wall socket.
- Never operate the appliance near any flammable objects.
- Cook only in the inner pot. Using the electrical base can result in electric shock.
- Make sure the lid is properly closed before operating. Improper use may result in scalding or other injuries.
- Always inspect the steam release valve to ensure it is clear of any clogging before use.
- Never open the lid before the product has cooled and all internal pressure has been released. Difficulty rotating the lid indicates that contents are still under pressure – it should never be forced open. After all the steam is released the pressure will decline and the lid will be able to rotate with ease.
- Tilt the lid away from you when removing it, in order to better protect your hands and face from the excess steam.
- Do not fill above the FULL line located within the inner pot. When cooking foods that expand such as rice or dried vegetables, do not fill the inner pot more than half-way. Over-filling may result in a clogged vent pipe or excess pressure.
- Not all foods are compatible with a pressure cooker. Applesauce, cranberries, barley, oatmeal, cereals, split peas, pasta and rhubarb create foam which clogs the steam vent. They should not be used in a pressure cooker.
- Do not use oil to fry foods in this appliance.
- Paper, cardboard and plastic materials can never be placed within the appliance while it is in operation.
- Never pour cold water into a hot pressure cooker.
- Ensure that the appliance has completely cooled down before attaching or removing components, and before cleaning.
- Do not use the inner pot with any source of heat other than this unit. Do not replace the inner pot with any accessory not created specifically for this unit.
- To ensure that it retains its quality and freshness, food should not be kept warm within this unit for more than 4 hours.
- Steam emitting from the circumference of the lid symbolizes a malfunction in the unit. Disconnect from its power supply and contact a local authorized repairman.

**Before using your pressure cooker:**

**Warning:** Be careful not to put anything near the steam release valve at any time.

- Clean all surfaces of the appliance base using a damp cloth and wipe dry. Properly wash the removable inner pot and lid with warm soapy water.
- Inspect the machine to ensure that it is ready for use with the pressure and safety valves clean and clear of any blockage and the rubber seal ring clean and in place around the lid.
- To ensure that the unit is assembled and working properly, it is recommended that you fill the pressure cooker to the 2/5 line and allow the pressure cooker to operate for a half-hour. Upon completion, remove the water and rinse and dry the inner pot. The unit is now ready for use!

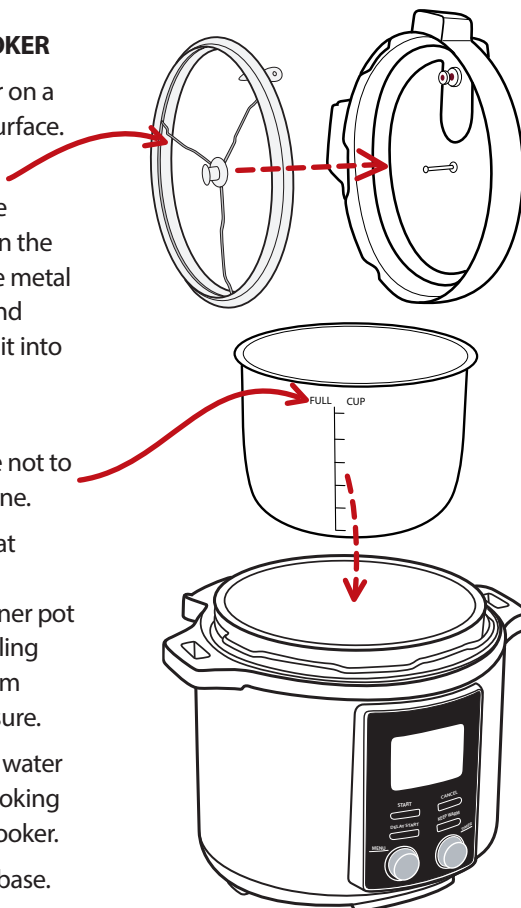
**USING YOUR PRESSURE COOKER**

1. Position the pressure cooker on a dry, flat and heat resistant surface.
2. Ensure that the Seal Ring is properly secured around the removable Y-Ring. Then align the center of the Y-Ring with the metal pin in the center of the lid and press down firmly to secure it into place.
3. Insert ingredients into the removable pot, making sure not to fill the pot above the FULL line.

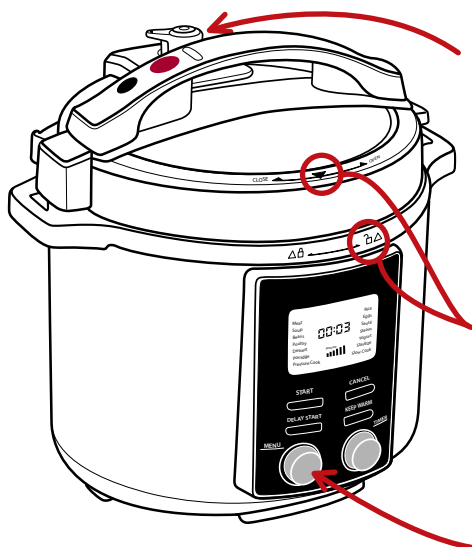
**Note:** When cooking foods that expand such as rice or dried vegetables, do not fill the inner pot more than half-way. Over-filling may result in a clogged steam release valve or excess pressure.

**Note:** A minimum of ½ cup of water must be used during any cooking process with this pressure cooker.

4. Place the inner pot into the base.
5. Plug the pressure cooker into a wall outlet.



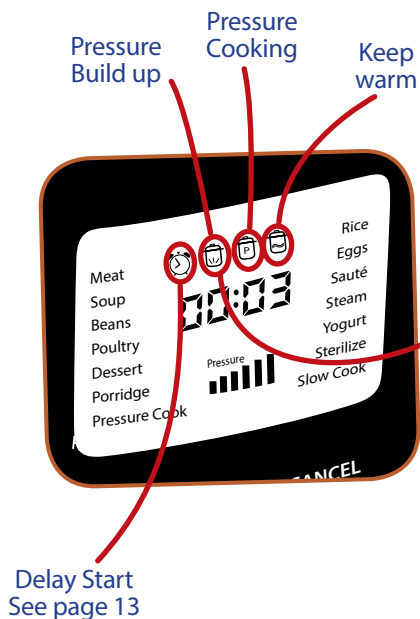
# USING YOUR PRESSURE COOKER



## USING YOUR PRESSURE COOKER

6. Place the Steam Release Valve into the space on the lid by pressing down until it clicks into place. Rotate the Steam Release Valve to the "sealing" position by aligning the arrow on Valve to the "sealing" icon (Do not rotate past the icon).
7. Secure the lid by aligning the arrow indicator on the lid with the "open lock icon" on the base. Press down firmly to seal and rotate clockwise until the arrow is aligned with the "closed lock icon" on the base.
8. Turn the Menu knob to select one of the preset menu options. The default cook times are programmed for portions under 3 lbs. For larger portions, adjust the default time or use the "Pressure Cook" option (see step 12).

**Note:** See chart on page 14 for details of each option's default programming.

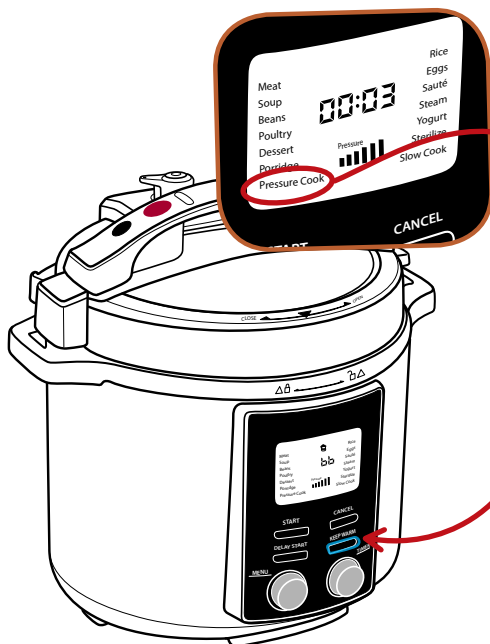


9. After the preset has been selected, the display will show the default cook time. The cook time can be adjusted by rotating the "Time" knob.
10. Press the START button. The display will show the Pressure Build Up icon along with the Pressure Build Up animation.

**Note:** The display will also show the Keep Warm icon (except when using the Yogurt preset), this indicates that the pressure cooker will enter the Keep Warm mode when the cooking cycle is done. To deactivate the Keep Warm feature, press and hold the Keep Warm button until the Keep Warm icon turns off.

11. Once the internal pressure is reached, the Pressure Cooking icon will appear and the cook time countdown will begin.





12. To set the pressure cooker manually, select the “Pressure Cook” function, then rotate the “Time” knob to select your desired cooking time. Press the “Start” button and proceed as you would with any of the preset options.

13. At the completion of all cooking cycles with the exception of “yogurt”, the unit will automatically enter a “Keep Warm” mode. While in the Keep Warm mode the display will show the Keep Warm icon and “bb” and the Keep Warm button will be illuminated.

**NOTE:** For the duration of time the unit is cooking with pressure, and until the pressure is released, the Float Valve will be raised and the lid is locked. NEVER ATTEMPT TO OPEN THE LID FOR THE DURATION OF THE PRESSURE COOKING TIME.

14. You can reset or cancel any function by pressing the “cancel” button at any time.

15. The pressure will naturally begin to drop during the keep warm cycle.

**Note:** You can only open the lid once the pressure is released (see page 12)

16. To open the lid press down the red button on the handle and turn the lid counterclockwise.

**Note:** Following the Porridge and Soup cooking cycle or after cooking any other recipe with a lot of liquid, the Steam Release Valve should not be rotated to “Venting” as the steam must be released naturally. Turning the Steam Release Valve to “Venting” may cause hot liquid to spray from the Steam Release Valve.



## USING THE STEAM RELEASE VALVE

This Pressure Cooker is equipped with two forms of pressure release:

### 1. Natural Release

It allows the cooker to rest after cooking until the pressure naturally subsides so the lid can be opened.

When foods have high liquid contents, such as soups, stews and beans, they will respond best to using the natural release method.

This avoids splattering and foaming when the lid is opened. Foods that can rest and continue while the pressure drops, such as roasts and whole chickens, can be used with the natural release method. To use the natural release method, rotate the Steam Release Valve to the "Sealing" icon (do not rotate the Valve past the icon)" and keep it in that position during and after cooking until the Float Valve drops, indicating the pressure inside has dissipated.



**CAUTION: Hot steam - use tongs or long utensil to turn the Steam Release Valve.**

**Keep hands and face away from Steam Release Valve.**

### 2. Quick Release

It allows the cooker to release pressure quickly when cooking is done so the lid can be opened.

Do not use this feature when pressure cooking grains, beans, rice, oatmeal, and other foods that can splatter or foam when the lid is opened. To use the quick release method, set the Steam Release Valve to "Sealing" during cooking and turn it to "Venting" when the cooking is done to release steam.

If foods such as vegetables or seafood require a precise cooking time, turn the steam release valve to venting to quickly release the pressure and open the lid.



## USING THE SAUTÉ PRESET

Before pressure cooking, many recipes will benefit from the golden color, richer flavors and moist results gained from sautéing. This setting allows cooking over high heat, without the lid

To sauté your meats or vegetables prior to pressure cooking:

1. Remove the lid from the unit.
  2. Add oil or butter into the inner pot, then add the food.
  3. Select the “sauté” preset. Press the “start” button.
  4. Stir or turn the food as needed until the desired color and consistency is reached.
  5. Press the “cancel” button if you want to cancel the sauté preset before the timer finishes counting down.
- Allow the unit to rest 2-3 minutes after canceling the sauté preset before beginning to pressure cook. If the unit will not begin pressure cooking, allow it to cool for a longer period after sautéing before selecting another preset.

## USING THE DELAY START FUNCTION

This function postpones the cooking time from beginning for up to 24 hours.

1. Prepare desired food and place into cooking pot.
2. Secure the lid onto the unit, turn in clockwise to lock it in place.
3. **Make sure the pressure release valve is set to the “sealing” position.**
4. Plug the pressure cooker into the wall outlet.
5. Select a preset (step 8, page 10) or set the desired cooking time manually (step 12, page 11).
6. Press the “delay start” button. The “delay start” indicator icon will illuminate and begin blinking. The display screen will show 0:30 which is equal to 30 minutes of delay time. Turn the time knob right to increase or left to decrease the desired time. The “delay start” time can be increased or decreased by 30 minute increments. The maximum delay period is 24 hours.
7. Press the Start button. The cooking cycle will begin after the delay start time elapses.

**CAUTION:** When using this function ensure that the foods being cooked are not sensitive to warm temperatures and will not spoil from remaining at room temperature for an extended period of time.

FUNCTIONS	DEFAULT COOK TIME	COOK TIME RANGE
Meat	15 Min	1-120 Min
Soup	25 Min	1-120 Min
Beans	40 Min	1-120 Min
Poultry	13 Min	1-120 Min
Dessert	18 Min	1-120 Min
Porridge	25 Min	1-120 Min
Rice	12 Min	1-120 Min
Eggs	5 Min	1-120 Min
Sauté	5 Min	1-30 Min
Steam	15 Min	1-120 Min
Yogurt	12:00 Hour	0.5-24 Hour
Sterilize	20 Min	1-120 Min
Slow Cook	6:00	0.5-24 Hour
Pressure Cook	1 Min	1-120 Min

**WARNING:**

- The lid cannot be opened until the pressure is fully released – do not attempt to force it open.
- The lid is very hot during and after use- do not touch any of the metal parts.

**General Tips and Tricks:**

- Use the sauté setting to sear or brown foods in the inner pan before cooking a full meal using a pressure setting.
- If cooking frozen food without defrosting, add ten minutes to the recommended cooking time
- Pressure cooking requires a different liquid to solid ratio. Use recipes written for pressure cooker cooking.
- The condensation container drains excess liquid that gathers around the rim. Insert and remove the container by sliding it on and off the rails.

MEAT COOKING CHART			
Type	Minutes	Release	Notes
Beef, brisket	40	natural	
Beef, flank steak	18-20	natural	
Beef, ground	10	natural	
Beef, ribs	18-20	quick	
Beef, roast	35-45	natural	increase time with weight
Beef, round	25-30	natural	
Beef, stew	15-18	natural	cut in 1-inch cubes
Chicken, breast	8	quick	boneless, skinless
Chicken, ground	10	quick	
Chicken, pieces	12-15	quick	bone-in
Chicken, strips	8	quick	
Chicken, whole	18-20	quick	2-3 pounds, cleaned
Cornish hen, whole	20	quick	2-3
Ham, pork	28-35	natural	bone-in
Lamb, chops	8	natural	bone-in
Lamb, ground	10	natural	
Lamb, leg	45	natural	bone-in
Lamb, roast	25	natural	2-3 pounds
Lamb, shoulder	25	natural	
Lamb, stew	15-18	natural	cut in 1-inch cubes
Pork, belly	40	natural	
Pork, chops	12	natural	
Pork, ground	10	natural	
Pork, leg/shank	35	natural	bone-in
Pork, loin	12	natural	
Pork ribs	18-20	quick	
Pork, roast	35-40	natural	boneless
Pork, sausage	10	natural	
Pork, tenderloin	8-15	natural	
Turkey, breast	20	natural	rolled/stuffed
Turkey, breast	12-15	natural	boneless, skinless
Turkey, leg	15	natural	bone-in
Turkey, wings	15	natural	bone-in
Veal, chop	10-12	natural	bone-in

### Tips for Meat:

- Cut foods into uniform- sized peices for best results. Stew meat should be cut in 1-2 inch cubes.
- Remove excess fat while cutting meat.
- Add at least 2 cups water, broth or wine to meat for the first 15 minutes of pressure cooking. If cooking longer, add 1/3 cup liquid for every additional 15 minutes of cooking.

GRAIN/RICE COOKING CHART			
Type	Minutes	Release	Notes
GRAINS			
Amaranth	9	natural	1 cup grain to 3 cups water
Barley, pearl	16-18	natural	1 cup grain to 4½ cups water
Buckwheat	10-12	natural	1 cup grain to 2 cups water
Hominy, grits	10-12	natural	1 cup grain to 4 cups water
Masa harina	10-12	natural	1 cup grain to 4 cups water
Matzoh meal	10-12	natural	1 cup grain to 2 cups water
Kamut, whole	10-12	natural	1 cup grain to 3 cups water
Millet	9-11	natural	1 cup grain to 3 cups water
Oats, rolled	10-20	natural	1 cup grain to 4 cups water
Oats, steel-cut	12-22	natural	1 cup grain to 4 cups water increase time with quantity
Quinoa	6-8	natural	1 cup grain to 2 cups water
Rye berries	15-18	natural	1 cup grain to 2 cups water
Wheat berries	8-10	natural	1 cup grain to 3 cups water
RICE			
Arborio	8-10	natural	1 cup rice to 1½ cups water
Basmati	8-10	natural	1 cup rice to 1½ cups water
Brown	17-22	natural	1 cup rice to 1½ cups water
Black	18-20	natural	1 cup rice to 1½ cups water
Converted	7-8	natural	1 cup rice to 1½ cups water
Jasmine	5-6	natural	1 cup rice to 1 cup water
Red	17-22	natural	1 cup rice to 1½ cups water
White, long grain	7-8	natural	1 cup rice to 1½ cups water
Wild	25-38	natural	1 cup rice to 3 cups water

**Tips for Cooking Rice**

- Various types of rice require differing ratios of water.
- Do not pre-soak rice, but rinse the rice in water- if desired. Add salt, if desired.
- Add 1 teaspoon oil or butter to the rice before cooking to help avoid splattering.

**BEAN COOKING CHART**

Type	Minutes	Release	Notes
Azuki	7-8	natural	
Black	10-12	natural	
Black-eyed peas	12-15	natural	
Chickpeas	13-15	natural	
Fava, dried	15-20	natural	
Great Northern	10-15	natural	
Kidney beans	12-15	natural	
Lentils, green	10-12	natural	
Lentils, red	10-15	natural	
Lentils, brown	10-12	natural	
Lima	8-10	natural	
Navy	10-12	natural	
Peas, split green	5-8	natural	

**Tips for Cooking Beans:**

- Although not required, for soft, tender beans, pre-soak in salted water for at least 8 hours. Stir in 2 tablespoons salt into 6 cups water and add beans. When done soaking, drain well.
- Place beans in inner pot and add 1 tablespoon oil. This helps reduce foaming.
- Add 4 cups water if cooking 1/2 pound dry beans. Add 8 cups water if cooking 1 pound dry beans.

**SEAFOOD COOKING CHART**

Note: Use the steaming rack to cook seafood. Place a heat-proof container on top of the rack.  
Add at least 2-3 cups of water to the inner pot to reach the minimum fill line.

Type	Minutes	Release	Notes
Clams	3-5	quick	
Fish, fillet	3-4	quick	
Fish, steak	3-5	quick	
Fish, whole	7-8	quick	cleaned
Lobster	3-5	natural	cleaned
Mussels	3-5	quick	
Oysters	3-5	quick	
Salmon, steak	4-6	quick	
Scallops	1-2	quick	
Shrimp	2-3	quick	

## VEGETABLE COOKING CHART

Type	Minutes	Release	Notes
Artichoke, hearts	3-5	normal	cut in half
Artichoke, whole	5-11	normal	add time with size
Asparagus	1-2	quick	
Beet, whole	10-20	quick	add time with size
Beet, cubed	3-5	quick	
Bok choy, baby	1-2	quick	
Broccoli	3-5	quick	
Brussels Sprouts	4-6	quick	
Cabbage	3-5	quick	all colors, cut in quarters
Carrots, whole	3-5	quick	
Carrots, sliced	3	quick	
Cauliflower	3	quick	cut in florets
Cauliflower	7-9	quick	whole or halves
Chard, Swiss	2-3	quick	
Collard greens	3-5	quick	
Corn, kernel	2-3	quick	
Corn, on cob	8-10	quick	
Eggplant	3-5	quick	cut in quarters
Green beans	2-3	quick	fresh or frozen
Greens, chopped	2-3	quick	
Kale	1-2	quick	
Leeks	3-4	quick	
Mushrooms, fresh	3-5	quick	
Okra	3	quick	
Onion	2-3	quick	whole or halved
Parsnips	2-3	quick	
Peas	2-3	quick	fresh or frozen
Peppers	2-4	quick	increase time with size
Potatoes, fingerling	6	quick	whole
Potatoes, chunks	5	quick	red, Yukon, creamer
Potatoes, whole	10-15	quick	increase time with size
Pumpkin	8	quick	cut in chunks
Squash, acorn	8	quick	
Squash, banana	5	quick	1-inch cubes
Squash, butternut	6	quick	halves
Squash, spaghetti	4-6	quick	halves
Tomato, slices	2-3	quick	
Tomatoes	3	quick	whole or halves
Turnips	5	quick	halves
Yams, halved	10-15	quick	increase weight with size
Zucchini	6	quick	cut in ¼ to ½ inch pieces



**Tips for Cooking Poultry**

- Place up to 3 pounds chicken pieces or whole prepared chicken in inner pot.
- For boneless, skinless chicken breast, choose sauté menu for 5 minutes, then pressure cook in poultry mode for 8 minutes.
- Add at least 2 cups water, broth or wine to poultry for the first 15 minutes of pressure cooking. If cooking longer add 1/3 cup liquid for every additional 15 minutes of cooking.
- Use fresh herbs when pressure cooking, as pressure cooking develops intense flavors.
- Strain and use the cooled chicken broth as a base for delicious soups.

**Tips for Cooking Porridge**

- Soak certain grains, such as wheat berries and pearl barley in water for at least 4 hours before cooking. Do not add salt to the water. Drain and rinse before cooking.
- Do not prepare oatmeal or other grains directly in the inner pot, as these cereals may splatter severely upon opening and/or clog the valve.
- Add a pinch of salt to the oatmeal or other grains before cooking- add sweeteners after cooking.
- Add a bit of oil to the oatmeal or grains to reduce foaming and splattering.

## TROUBLESHOOTING

PROBLEM	POSSIBLE CAUSE	SOLUTION
Lid will not close	Seal ring is not in place or missing	Adjust or insert seal ring
	Lid is not properly aligned with pressure cooker base	Align the indicator line on the edge of the lid with the right indicator triangle and rotate the lid clockwise.
Lid will not open	Pressure cooker is still pressurized.	The stream needs to be released by either the "natural" or "quick" release method.
	The Float Valve is stuck in the locked (up) position.	Ensure the pressure has been released then use a long utensil to gently press the Float Valve down.
Excess steam leaking between the lid and the pressure cooker housing	Damaged seal ring	Replace the seal ring
	Missing seal ring	Insert the seal ring
	Build up or debris on seal ring	Remove the seal ring and clean it according to instructions.
	Lid not properly attached	Ensure lid is aligned and closed. Gently push down on the lid handle.
Float valve will not rise (lock) so pressure can- not build	Not enough liquid added to the recipe.	Remove lid and add liquid
	Silicone stopper on float valve is dirty or worn out.	Clean float valve and silicone stopper/ replace silicone stopper.
Occasional popping noise coming from pressure cooker	The control board component cycles with the thermostat during use.	This is normal
	The inner pot is wet	Make sure the inner pot and the inside of the pressure cooker are completely dry before use
Excessive steam coming from the steam release valve	Steam release valve not properly connected	Remove the steam release valve and place it back inside correctly
Rice is too soft	Too much water added	Adjust the rice to water ratio to use less water
Rice is not fully cooked	Not enough water added	Adjust the rice to water ratio to use more water
	Lid removed	After the cook cycle has ended leave the lid in place for an additional 5 minutes.

## TROUBLESHOOTING

PROBLEM	POSSIBLE CAUSE	SOLUTION
Pressure cooker won't energize.	Power cord is disconnected from pressure cooker.	Ensure cord is secured to the pressure cooker.
LCD Display shows code "E1"	The sensor is experiencing an open circuit.	Unplug from the power supply and wait 10 minutes. If problem persists, contact the manufacturer or authorized agent regarding repair or replacement.
LCD Display shows code "E2"	The sensor is experiencing a short circuit.	Unplug from the power supply and wait 10 minutes. If problem persists, contact the manufacturer or authorized agent regarding repair or replacement.
LCD Display shows code "E3"	The unit is overheating.	Unplug from the power supply and wait 10 minutes. If problem persists, contact the manufacturer or authorized agent regarding repair or replacement.
LCD Display shows code "E4"	There is a malfunction with the signal switch	Unplug from the power supply and wait 10 minutes. If problem persists, contact the manufacturer or authorized agent regarding repair or replacement.
LCD Display shows "LID"	The lid is not properly secured in place.	Ensure that the lid is properly sealed and secured in place and try to start the machine again. Note: The sauté function can be activated without a lid.

## CLEANING AND MAINTENANCE

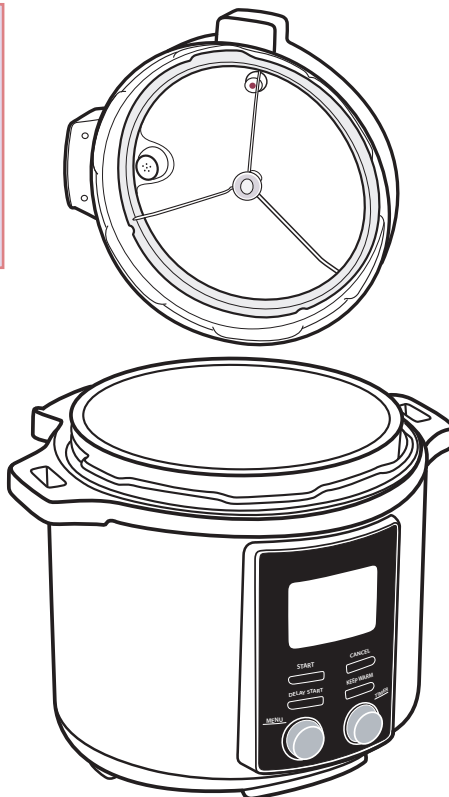
- Clean the appliance after every use.
- Make sure the appliance is completely cooled off before cleaning.
- Do not use metal kitchen utensils or abrasive cleaning material, to clean the pressure cooker.

1. The interior and exterior of the electrical base can be wiped down with a slightly damp and soft cloth, using mild detergent as needed. Never immerse the pressure cooker or cord in water or any other liquid.

2. The following components can be removed and washed thoroughly using mild detergent and warm running water: Lid, Seal Ring, Steam Release Valve, rubber ring on the Float Valve, inner pot, rack and Condensation cup (remove by gently grasping and firmly pulling upwards). Allow all parts to dry completely before reassembling.

### NOTE:

- Do not use abrasive materials on the non-stick surface of the inner pot to avoid scratching.
- To prevent wear and tear, do not lock the lid of the pressure cooker into place when storing



**NOTE:** After use, ensure that the appliance is completely cooled off and dry before removing the cord. Loosely coil the cord and store it within the inner pot of the appliance. Store the appliance in a clean and dry location.

## **WARRANTY & SERVICE**

This Limited Warranty is for one full year from the date of purchase. It is applicable to the original purchaser only and is not transferable to a third party user. Repair or replacement of defective parts is solely at the seller's discretion. In the event that repair isn't possible, the seller will replace the product/part. If product repair/replacement won't suffice, the seller has the option of refunding the cash value of the product or component returned.

Product defects not covered under the Warranty provisions include normal wear and damage incurred from use or accidental negligence, misuse of instruction specifications or repair by unauthorized parties. The manufacturing company is not liable for any incidental or consequential damages incurred by such circumstances.

### **Environment**

Do not throw away the appliance with the normal household waste at the end of its life, but hand it in at an official collection point for recycling. By doing this, you help to preserve the environment.

### **Guarantee and service**

If you need service or information or if you have a problem, please visit our website or contact your distributor.

**FOR CUSTOMER SERVICE  
QUESTIONS OR COMMENTS  
VISIT US @ GOURMIA.COM  
INFO@GOURMIA.COM  
OR CALL 888.552.0033**



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 I STR CTIO S O E T PAGE O THIS ORM.

I. (a) PLAINTIFFS

County of Residence of First Listed Plaintiff rd  
E CEPT I .S. PLA I TI CASES

Attorneys rd M R M R R M  
rd

DEFENDANTS

County of Residence of First Listed Defendant R  
I .S. PLA I TI CASES O L

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

II. BASIS OF JURISDICTION Place an in One Box Only

- ☐ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question .S. Government ot a Party  
☒ 4 Diversity Indicate Citi enship of Parties in Item III

III. CITIZENSHIP OF PRINCIPAL PARTIES Place an in One Box for Plaintiff and One Box for Defendant

- Citizen of This State ☐ 1 ☐ 1 Incorporated or Principal Place of Business In This State ☐ 4 ☒ 4  
Citizen of Another State ☒ 2 ☐ 2 Incorporated and Principal Place of Business In Another State ☐ 5 ☐ 5  
Citizen or Subject of a Foreign Country ☐ 3 ☐ 3 Foreign Nation ☐ 6 ☐ 6

IV. NATURE OF SUIT Place an in One Box Only

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

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

V. ORIGIN Place an 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 ☐ 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):

Brief description of cause:

rd r r r r

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

See instructions : JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

R d

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**CERTIFICATION OF ARBITRATION ELIGIBILITY**

Local Arbitration Rule 83.7 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration ☐

I, Randi Kassar, counsel for Plaintiffs, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

- ☒ monetary damages sought are in excess of \$150,000.00 exclusive of interest and costs,
- ☐ the complaint seeks injunctive relief, or
- ☐ the matter is otherwise ineligible for the following reason:

**DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1**

Identify any parent corporation and any publicly held corporation that owns 10% or more of its stocks. Add an additional page if needed.

None.

**RELATED CASE STATEMENT (Section VIII on the Front of this Form)**

Please list all cases that are arguably related pursuant to Division of Business Rule 3 in Section VIII on the front of this form. Rule 3(a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 3(a) provides that "A civil case shall not be deemed "related" to another civil case merely because the civil case involves identical legal issues, or the same parties." Rule 3 further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (b), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

N/A

**NEW YORK EASTERN DISTRICT DIVISION OF BUSINESS RULE 1(d)(3)**

*If you answer "Yes" to any of the questions below, this case will be designated as a Central Islip case and you must select Office Code 2.*

1. Is the action being removed from a state court that is located in Nassau or Suffolk County? ☐ Yes ☒ No
2. Is the action—not involving real property—being brought against United States, its officers or its employees AND the majority of the plaintiffs reside in Nassau or Suffolk County? ☐ Yes ☒ No
3. If you answered "No" to all parts of Questions 1 and 2:
  - a. Did a substantial part of the events or omissions giving rise to claim or claims occur in Nassau or Suffolk County? ☐ Yes ☒ No
  - b. Do the majority of defendants reside in Nassau or Suffolk County? ☐ Yes ☒ No
  - c. Is a substantial amount of any property at issue located in Nassau or Suffolk County? ☐ Yes ☒ No
4. If this is a Fair Debt Collection Practice Act case, was the offending communication received in either Nassau or Suffolk County? ☐ Yes ☐ No

*(Note, a natural person is considered to reside in the county in which that person is domiciled; an entity is considered a resident of the county that is either its principal place of business or headquarters, of if there is no such county in the Eastern District, the county within the District with which it has the most significant contacts).*

**BAR ADMISSION**

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.



Yes



No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?



Yes (If yes, please explain)



No

I certify the accuracy of all information provided above.

Signature: /s/ Randi Kassar



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

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

J.E.B., a minor, by and through her mother, MYESHA  
MAGGIT, individually, and as custodial parent and  
next friend

\_\_\_\_\_  
*Plaintiff(s)*

v.

THE STEELSTONE GROUP, LLC  
d/b/a GOURMIA

\_\_\_\_\_  
*Defendant(s)*

)  
)  
)  
)  
) Civil Action No. 1:25-cv-03028  
)  
)  
)  
)  
)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* THE STEELSTONE GROUP, LLC  
3611 14TH AVENUE, SUITE 540  
BROOKLYN, NY, UNITED STATES, 11218

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: Randi Kassan, Esq.  
MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN, PLLC  
100 Garden City Plaza, Suite 500  
Garden City, NY 11530

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.

BRENNNA B. MAHONEY  
CLERK OF COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE***( This section should not be filed with the court unless required by the local rules. )*

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: