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LAUG 01 2022

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS NORTHERN DIVISON

TAMMY H. DOWNS, CLERK

DEP CLERK

INDIA SMITH,

Plaintiff,

Case No .: 3:22 - CV - 00 198 - KGB

v.

TABLETOPS UNLIMITED, INC. d/b/a TTU,

Defendant.

## **COMPLAINT AND DEMAND FOR JURY TRIAL**

Plaintiff INDIA SMITH by and through her undersigned counsel, JOHNSON BECKER, PLLC and KEITH LAW GROUP hereby submits the following Complaint and Demand for Jury Trial:

## **NATURE OF THE ACTION**

1. This is a product liability action seeking recovery for substantial personal injuries and damages suffered by **Plaintiff India Smith** (hereafter referred to as "Plaintiff"), after Plaintiff was seriously injured by a "Philippe Richard Pressure Cooker" Model Number YPC 1301(hereafter generally referred to as "pressure cooker(s)").

2. Defendant Tabletops Unlimited, Inc. d/b/a TTU (hereinafter generally referred to as "Defendant TTU") designs, manufactures, markets, imports, distributes and sells a wide-range of consumer products, including the subject "Phillippe Richard Pressure Cooker," which specifically includes the aforementioned pressure cooker at issue in this case.

This case assigned to District Judge Baker and to Magistrate Judge VOIPe

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3. On or about November 28, 2016, Plaintiff suffered serious and substantial burn injuries as the direct and proximate result of the pressure cooker's lid suddenly and unexpectedly exploding off the pressure cooker's pot 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.

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

#### THE PARTIES

5. Plaintiff was and is, at all relevant times, a resident and citizen of the City of Wynne, County of Cross, State of Arkansas, and is therefore a citizen of the State of Arkansas for purposes of diversity under 28 U.S.C. § 1332.

6. Defendant TTU is a California Corporation, which has a headquarters and registered service address of 23000 Avalon Blvd., Carson, CA 90745, and is therefore a citizen of the State of California for purposes of diversity under 28 U.S.C. § 1332.

7. Defendant TTU designs, manufacturers, markets, imports, distributes and sells a variety of consumer products including pressure cookers, cutlery, pots, and pans, amongst others.

#### **JURISDICTION & VENUE**

8. 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.

9. 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.

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10. Venue and jurisdiction are proper in this Court pursuant to 28 U.S.C. § 1391 because Defendant has sufficient minimum contacts with the State of Arkansas and has intentionally availed itself of the markets within Arkansas through the promotion, sale, marketing, and distribution of its products.

11. Jurisdiction over Defendant TTU is also proper under the due process provisions of the Arkansas and United States constitutions. *See e.g. Ford Motor Co. v. Montana Eighth Jud. Dist. Ct.*, 141 S. Ct. 1017 (2021).

## **FACTUAL ALLEGATIONS**

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

13. Defendant TTU warrants, markets, advertises and sell its pressure cookers as a means to cook "faster" and "healthier" allowing consumers to "preserve nutrients and flavors." <sup>1</sup>

14. According to the Owner's Manual accompanying the individual unit sold, the pressure cookers purport to be designed with an "auto-lock system,"<sup>2</sup> and "triple safety features"<sup>3</sup> which include the misleading the consumer into believing that the pressure cookers are reasonably safe for their normal, intended use. Said "safety systems" include, but is not limited to, the following:

- a. The **PRESSURE REGULATOR** (1) fits onto the **STEAM VENT PIPE** (2). When the proper operating pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure inside the cooker. The gentle rocking motion of the pressure regulator is an indication that the proper cooking pressure is being maintained.
- b. The SAFETY LOCK (3) automatically releases air from the unit as you begin heating the pressure cooker. As pressure builds, the safety lock slides up, causing the LOCK PIN (4) to lock the lid in place. The safety lock will be in the up position when the cooker is pressurized. When the safety lock is in the down

<sup>&</sup>lt;sup>1</sup> Attached hereto is Exhibit A is a copy of the Philippe Richard's 8 quart aluminum pressure cooker., *See*, e.g. pg. 1.

<sup>&</sup>lt;sup>2</sup> Id.

<sup>&</sup>lt;sup>3</sup> Id.

position, the unit is depressurized and safe to open.

c. The SEALING RING (6) fits around the inside rim of the lid (see below) and forms a pressure-tight seal between the LID (7) and the BODY (8) of the cooker. If the vent pipe becomes clogged and excess pressure cannot be released normally, steam is automatically released by the OVERPRESSURE PLUG (9). This is a safety device and you should check its condition periodically.

15. By reason of the forgoing acts or omissions, the above-named Plaintiff and/or 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. On or about August 24, 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 Plaintiffs. The incident occurred as a result of the failure of the pressure cooker's supposed "safety features" 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.

17. Plaintiff and her family 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 TTU.

18. However, the aforementioned pressure cooker was defectively and negligently designed and manufactured by Defendant TTU 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.

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19. Defendant TTU'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.

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

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

22. As a direct and proximate result of Defendant TTU'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, Plaintiff used an unreasonably dangerous pressure cooker, which resulted in significant and painful bodily injuries.

23. Consequently, the Plaintiff in this case seeks compensatory damages resulting from the use of Defendant TTU'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 PRODUCTS LIABILITY

24. Plaintiff incorporates by reference all other paragraphs of this Complaint as if fully set forth herein, and further alleges

25. Defendant TTU designed, manufactured, sold, distributed, marketed, and supplied the Subject Pressure Cooker, which was designed in a defective condition; defectively manufactured; contained inadequate and incomplete warnings for foreseeable consumers and

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users; and were otherwise unreasonably dangerous for its intended use by foreseeable consumers, including Plaintiff.

26. The Subject Pressure Cooker was unreasonably dangerous in design and manufacture due to the lid of the pressure cooker being removable with built-up pressure, heat and steam still inside the unit.

27. Defendant TTU failed to act reasonably in choosing a design of the Subject Pressure Cooker that did not prevent the lid from being removed while still pressurized.

28. Defendant TTU have used a safer alternative design to prevent the lid from being removed while still pressurized.

29. At the time the Subject Pressure Cookers were manufactured and sold by Defendant TTU they were defective, unsafe, and unreasonably dangerous for their intended and foreseeable use(s) by consumers, including Plaintiff, due to these manufacturing defects or omissions by Defendant TTU

30. The manufacturing defects of the Subject Pressure Cooker allowed the lid of the pressure cooker to be removed with built-up pressure, heat, and steam still inside the unit, leading to serious personal injuries like those described herein in this Complaint.

31. Defendant TTU failed to conduct adequate safety testing and inspection of the Subject Pressure Cooker.

32. The Subject Pressure Cooker did not contain adequate warnings or instructions for use, making it defective and unreasonably dangerous to consumers and foreseeable users of the Subject Pressure Cooker, including Plaintiff.

33. Defendant TTU failed to warn foreseeable users and consumers, including Plaintiff, of any specific risk of harm, including that the Subject Pressure Cooker could suddenly and unexpectedly explosively separate from the unit during its normal directed use.

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34. The Subject Pressure Cooker was expected to reach and did reach the intended consumers, including Plaintiff, without substantial change in the condition in which it was sold.

35. A reasonable consumer, including Plaintiff, would not have reason to expect that the lid Subject Pressure Cooker could suddenly and unexpectedly explosively separate from the unit during its normal directed use.

36. Plaintiff did not misuse or materially alter the Subject Pressure Cooker and is unaware as to how she could have avoided the incident.

37. At the time they were sold, Defendant TTU knew or should have known that the lid Subject Pressure Cooker could suddenly and unexpectedly explosively separate from the unit during its normal directed use.

38. The design and manufacturing defects contained within the Subject Pressure Cooker, as well as Defendant TTU inadequate warnings and instructions for the use of the Subject Pressure Cooker, were the proximate causes of, directly resulted in, and/or substantially contributed to the injuries sustained by Plaintiff and her resulting damages, for which the Defendant TTU in this case are liable.

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

## **COUNT II**

### **NEGLIGENCE**

39. Plaintiff incorporates by reference all other paragraphs of this Complaint as if fully set forth herein, and further alleges:

40. Defendant TTU, including its officers, employees, and agents, had a duty of reasonable care to market and sell non-defective pressure cookers, including the Subject Pressure Cooker,

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that was reasonably safe for its intended uses by consumers.

41. Defendant TTU failed to exercise the ordinary care required by a reasonably prudent manufacturer, retailer and/or distributor in the design, manufacture, marketing, distribution, sale, and advertising of its pressure cookers, including the Subject Pressure Cooker, in that Defendant TTU knew or should have known that the Subject Pressure Cooker created a substantial risk of unreasonable harm to Plaintiff and consumers alike.

42. Defendant TTU was negligent in the designing, manufacturing, advertising, marketing, distributing, and selling the Subject Pressure Cooker in that, among other things, it:

- 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. Aggressively over-promoted and marketed its pressure cookers through television, social media, and other advertising outlets; and
- d. Were otherwise careless or negligent.

43. Defendant TTU's negligence was the proximate cause of, directly resulted in, and/or substantially contributed to the injuries sustained by Plaintiff and her resulting damages, for which the Defendant TTU in this case are liable.

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

## **COUNT III**

## **NEGLIGENT MANUFACTURING DEFECT**

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

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45. At all times material to the allegations in this Complaint, Defendant TTU was in the business of manufacturing designing, testing, marketing, certifying, supplying, selling, importing and distributing the Subject Pressure Cooker, which was negligently manufactured.

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

47. As a result, the Subject Pressure Cooker contained defects in its manufacturing process, which rendered it unreasonably dangerous to consumers, such as the Plaintiffs, when used as intended or as reasonably foreseeable to Defendant TTU. The defect in the manufacturing process allowed the lid of the Subject Pressure Cooker to be removed while still retaining pressure.

48. Prior to and at the time of the incident at issue in this lawsuit, the Subject Pressure Cooker was not materially changed from the condition in which was manufactured.

49. Even though Defendant TTU knew or should have known that it's pressure cookers could retain pressure, despite the appearance that all pressure had been released, Defendant TTU continued to market and sell Pressure Cookers to the general public.

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

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

## **COUNT IV**

#### **NEGLIGENT DESIGN DEFECT**

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

52. At all times material to the allegations in this Complaint, Defendant TTU was in the business of manufacturing designing, testing, marketing, certifying, supplying, selling, importing and distributing the Subject Pressure Cooker, which was negligently designed.

53. Defendant TTU failed to exercise reasonable care in designing, developing, manufacturing, 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.

54. As a result, the Subject Pressure Cooker contained defects in its design, which rendered it unreasonably dangerous to consumers, such as the Plaintiff, when used as intended or as reasonably foreseeable to Defendant TTU. The defect in its design allowed the lid of the Subject Pressure Cooker to be removed while still retaining pressure

55. Prior to and at the time of the incident at issue in this lawsuit, the Subject Pressure Cooker was not materially changed from the condition in which was manufactured.

56. Even though Defendant TTU knew or should have known that it's pressure cookers could retain pressure, despite the appearance that all pressure had been released, Defendant TTU continued to market and sell Pressure Cookers to the general public.

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

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

### COUNT V

## **NEGLIGENT INFORMATION DEFECT**

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

59. At all times material to the allegations in this Complaint, Defendant TTU knew or had reason to know that Pressure Cookers, including the Subject Pressure Cooker, were dangerous and created an unreasonable risk of harm to consumers, including the Plaintiffs.

60. Defendant TTU had a duty to exercise reasonable care to warn consumers of the dangerous conditions or the facts that made Pressure Cookers likely to be dangerous.

61. Even though Defendant TTU knew or should have known that it's pressure cookers could retain pressure, despite the appearance that all pressure had been released, Defendant TTU continued to market and sell Pressure Cookers to the general public.

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

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

## **COUNT VI**

## **BREACH OF IMPLIED WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE**

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

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64. Defendant TTU manufactured, supplied, and sold Pressure Cookers with an implied warranty that they were fit for the particular purpose of efficiently and safely cooking meals.

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

66. Defendant TTU' Pressure Cookers were not fit for the particular purpose as a safe means of cooking meals due to the lid of the pressure cooker being removable with built-up pressure, heat and steam still inside the unit.

67. The Plaintiffs reasonably relied on Defendant TTU's implied warranty that its Pressure Cookers were a safe means of cooking.

68. Defendant TTU's breach of implied warranty was the direct and proximate cause of the Plaintiff's injuries and damages.

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

#### **COUNT VII**

## BREACH OF IMPLIED WARRANTY OF MERCHANTABILITY

69. Plaintiffs incorporate by reference each preceding and succeeding paragraph as though set forth fully at length herein.

70. Defendant TTU manufactured, supplied, and sold Pressure Cookers with an implied warranty that the vehicles were merchantable and fit for the ordinary purposes for which they were intended.

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

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72. Defendant TTU's Pressure Cookers were not merchantable and fit for the ordinary purposes for which they were intended as a safe means of cooking meals due to the lid of the pressure cooker being removable with built-up pressure, heat, and steam still inside the unit.

73. The Subject Pressure Cooker was purchased 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 use of cooking meals.

74. Defendant TTU' breach of implied warranty was the direct and proximate cause of the Plaintiffs' injuries and damages.

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

## **INJURIES & DAMAGES**

75. As a direct and proximate result of Defendant TTU's negligence and wrongful misconduct as described herein, Plaintiff has suffered and will continue to suffer physical and emotional injuries and damages including past, present, and future physical and emotional pain and suffering as a result of the incident. Plaintiff is entitled to recover damages from Defendant TTU for these injuries in an amount which shall be proven at trial.

76. As a direct and proximate result of Defendant TTU's negligence and wrongful misconduct, as set forth herein, Plaintiff has incurred and will continue to incur the loss of full enjoyment of life and disfigurement as a result of the incident. Plaintiff is entitled to recover damages for loss of the full enjoyment of life and disfigurement from Defendant TTU in an amount to be proven at trial.

77. As a direct and proximate cause of Defendants' negligence and wrongful misconduct, as set forth herein, Plaintiff has incurred medical treatment expenses and will continue to incur

expenses for medical care and treatment, as well as other expenses, as a result of the severe burns she suffered from the incident. Plaintiff is entitled to recover damages from Defendant TTU for her past, present and future medical and other expenses in an amount which shall be proven at trial.

## PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment against the Defendant TTU as follows:

- A. That Plaintiff has a trial by jury on all of the claims and issues;
- B. That judgment be entered in favor of the Plaintiff and against Defendant TTU on all of the aforementioned claims and issues;
- C. That Plaintiff recover all damages against Defendant TTU, general damages and special damages, including economic and non-economic, to compensate the Plaintiff for her injuries and suffering sustained because of the use of the Defendant TTU's defective pressure cooker;
- D. That all costs be taxed against Defendant TTU;
- E. That prejudgment interest be awarded according to proof;
- F. That Plaintiff be awarded attorney's fees to the extent permissible under Mississippi law; and
- G. That this Court awards any other relief that it 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,

KEITH LAW GROUP, PLLC

Sean T. Keith

Lic. No. 93158 Regions Bank Building 5050 W Northgate Rd #108 Rogers, AR 72758 (479) 326-7734 Sean@keithlawgroup.com

In association with:

Dated: July 26, 2022

## **JOHNSON BECKER, PLLC**

Adam J. Kress, Esq. (MN #0397289) *Pro Hac Vice to be filed* 444 Cedar Street, Suite 1800 St. Paul, MN 55101 (612) 436-1800 / (612) 436-1801 (fax) akress@johnsonbecker.com

Attorneys for Plaintiff

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# **EXHIBIT A** YPC 2055C Owner's Manual



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# **IMPORTANT SAFEGUARDS**

To minimize the risk of personal injury or damage to your kitchen, these safety precautions should always be followed:

- 1. Read all instructions.
- 2. Do not touch hot surfaces; use handles or knobs.
- Close supervision is necessary when the pressure cooker is used near children.
- 4. Do not use this pressure cooker for pressure frying with oil.
- 5. Do not place pressure cooker in a heated oven.
- 6. Extreme caution must be used when moving a pressure cooker containing hot liquids.
- 7. Do not use the pressure cooker for anything other than its intended use.
- 8. This appliance cooks under pressure. Improper use may result in scalding injury. Make certain the unit is properly closed before operating. See "USING YOUR PRESSURE COOKER."
- 9. Do not fill over 2/3 full. When cooking foods that expand during cooking such as rice or dried vegetables, do not fill over ½ full. Overfilling may cause a risk of clogging the vent pipe and developing excess pressure. See "COOKING TIMES."
- 10. Do not 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 device.
- 11. Always check the pressure release devices for clogging before use. NEVER REMOVE THE PRESSURE REGULATOR UNTIL PRESSURE HAS BEEN RELEASED.
- 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 separate, this indicates that the cooker is still pressurized—do not force open. Any pressure in the cooker can be hazardous. See "USING YOUR PRESSURE COOKER."
- 13. Be sure that handles are assembled and fastened properly before each use. Cracked, broken or charred handles should be replaced.
- 14. When the normal operating pressure is reached, turn the heat down so all the liquid, which creates the steam, does not evaporate.
- 15. Do not attempt to repair or modify any part of this pressure cooker. If repair is needed, please contact TTU customer service. For contact information please see pg. 5.

# **SAVE THESE INSTRUCTIONS**

## WHAT IS A PRESSURE COOKER?

A pressure cooker is a saucepan with a special lid that locks securely into place. As the pressure cooker is heated, the dry air is automatically exhausted and the moist, heated air is sealed inside, increasing the pressure within the cooker. When the optimum pressure is reached, internal temperatures in the cooker are raised above the normal boiling point of water, causing foods to cook faster. The higher pressure and temperature speed cooking and tenderize meats naturally. Before using the pressure cooker for the first time, it is important to become familiar with the various parts and features of the unit and to read the "USING YOUR PRESSURE COOKER" section. Here are some of the key components of the pressure cooker:

## **GET TO KNOW YOUR PRESSURE COOKER**

THIS PRESSURE COOKER IS INTENDED FOR HOUSEHOLD USE ONLY

## WELCOME

Discover how fast and easy it is to prepare a wide variety of delicious meals that focus on good health and nutrition while still tasting great. Designed for today's fast paced, health-conscious lifestyle, your pressure cooker is ideal for preparing fast, tasty meals designed to keep your family healthy and fit. Pressure-cooking preserves flavors and nutrients, tenderizes meat, and cooks foods three to ten times faster than other methods.



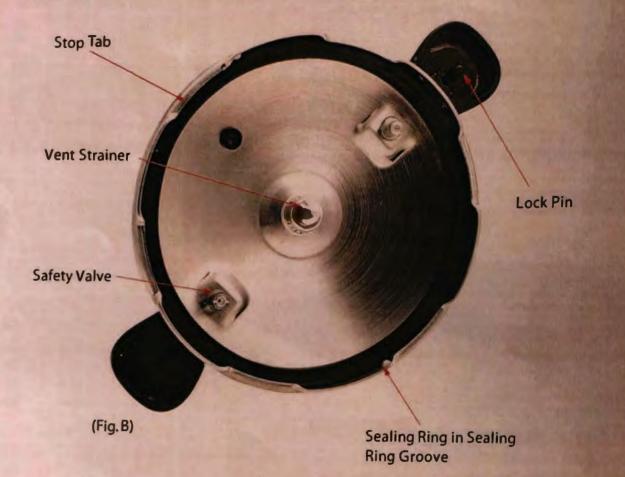
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The **PRESSURE REGULATOR** (1) fits onto the **STEAM VENT PIPE** (2). When the proper operating pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure (12 lbs/sq. in.) is reached, the pressure regulator will rock gently and control the pressure (12 lbs/sq. in.) is reached, the pressure (12 lbs/sq. in.)

inside the cooker. The gentle rocking motion of the pressure regulator is an indication that the proper cooking pressure is being maintained.

**The SAFETY LOCK** (3) automatically releases air from the unit as you begin heating the pressure cooker. As pressure builds, the safety lock slides up ,causing the LOCK PIN (4) to lock the lid in place. The safety lock will be in the up position when the cooker is pressurized. When the safety lock is in the down position, the unit is depressurized and safe to open.

The SEALING RING (6) fits around the inside rim of the lid (see below) and forms a pressure-tight seal between the LID (7) and the BODY (8) of the cooker. If the vent pipe becomes clogged and excess pressure cannot be released normally, steam is automatically released by the OVERPRESSURE PLUG (9). This is a safety device and you should check its condition periodically.



## **BEFORE FIRST USE**

Remove the sealing ring by pulling it out of the inside rim of the lid. Wash the ring, lid, and body in warm soapy water to remove any packaging material and manufacturing lubricant. Rinse the ring, lid, and body in warm water, and dry. When replacing the sealing ring, be careful to fit it under the stop tabs located on the inside rim on the lid. The **SAFETY VALVE** (1) works with the pressure regulator to release any excess pressure. The **VENT STRAINER CAP** (1) can prevent foods from clogging the steam vent pipe. If SAFETY VALVE and VENT STRAINER fail, the overpressure plug will pop out and release the excess pressure.

## **IMPORTANT SAFETY TIPS**

Our pressure cooker is designed to prepare delicious, healthy meals in less time than traditional cooking methods. Used properly, your pressure cooker is one of the safest appliances in your kitchen. Ensuring safe operation is as easy as following these simple rules:

#### 1. Do not overfill the pressure cooker.

2. Always visually examine the steam vent pipe to make sure it is clear before locking the lid in place.

3. Always fully close and lock the lid of the pressure cooker.

4. Never open the cooker when it contains pressure (when the safety lock is in the up position, there is pressure in the cooker).

5. Replace the overpressure plug when it becomes hard, deformed, cracked, worn or pitted, or when replacing the sealing ring. Replace the sealing ring when it becomes hard, deformed, cracked, worn, pitted, or soft and sticky.

Understanding these instructions is important. So that you understand why these instructions must be followed every time you use the cooker, please read the following:

#### 1. Never overfill the pressure cooker.

If the cooker is overfilled, this may cause the pressure relief services to stop functioning properly. The pressure regulator is designed to maintain safe cooking pressures. It relieves excess pressure through the vent pipe as it rocks back and forth. The overpressure plug is a backup pressure relief valve designed to release excess pressure if the pressure regulator fails to operate properly. Neither one can perform their function if there are obstructions in the other. Obstructions can occur if the pressure cooker is overfilled. For most foods, it is safe to fill the pressure cooker up to 2/3 full. There are a few foods that expand to the point that the pressure cooker should never be more than ½ full when cooking them. There are also foods that, because of the foaming, frothing, and sputtering that occur during cooking, should never be pressure-cooked. The pressure cooker is marked at the ½ and 2/3 full levels so that you always know how much liquid is in the unit.

Be sure to not let any of the foods you are cooking extend above the maximum fill level (Fig. C)



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# 2. Visually examine the steam vent pipe for obstructions before using the cooker.

To examine the steam vent, unscrew the pressure regulator (Fig. A #1) on the top of the lid. Next, turn over the lid and gently remove the strainer cover from the base of the vent (Fig.D1 and D2). Hold the lid up to a light to confirm that the vent is clear of any obstruction. If the steam vent pipe is blocked, remove the obstruction before using the cooker. Replace the strainer cover before using the unit. Failure to remove an obstruction from the steam vent will result in pressure building to unsafe levels.

## 3. Always fully lock the lid of the unit.

The lid handles must be aligned directly over the body handles. The specially designed lugs in the lid are designed to lock in place when the lid is properly closed. However, if the lid is not properly seated, the lugs will not lock the lid onto the body. It is possible that pressure may build inside the cooker and cause the cover to come off, possibly resulting in bodily injury or property damage.

## 4. Never open the cooker when it is pressurized.

Opening the pressure cooker while it is pressurized will cause the contents of the cooker to erupt. which could cause bodily injury or property damage.

## 5. Replace the overpressure plug and the sealing ring.

Replace if they become hard, deformed, cracked, worn, pitted, or soft and sticky; or every two years; whichever occurs first. Always replace the overpressure plug when replacing the sealing ring. The overpressure plug is a backup pressure relief valve, and is designed to relieve excess pressure from the cooker cover in the event that the vent pipe should become blocked. The overpressure plug is made of rubber. Over time, depending on the frequency and type of use, rubber becomes hard and inflexible, loses its ability to act as a backup pressure relief valve, and should thus be replaced immediately. Frequent contact with oily foods will cause the sealing ring to deteriorate. Deterioration will result in the ring becoming either hard and inflexible or soft and tacky. Should this occur, immediately replace the ring, as failure to do so could result in pressure release, causing great bodily harm and/or property damage. Do not apply cooking oil to the sealing ring.

# HOW TO ORDER REPLACEMENT PARTS

To order replacement parts (Pressure Regulator or Sealing Ring), send a money order in the amount of \$8.00 US Dollars to: Tabletops Unlimited, at the address below. Contact Customer Service for further details and instructions on ordering replacement parts.

Tabletops Unlimited Inc.; 23000 S. Avalon Blvd; Carson, CA 90745 Attention: Customer Service Department, Pressure Cooker Replacement. Phone number: 310-549-6000 · Web address: www.ttucorp.com Customer Service e-mail: customerservice@ttucorp.com



Steam Vent with Strainer Removed

5

(FIG. D1)

(FIG. D2)

## **USING YOUR PRESSURE COOKER**

Having familiarized yourself with the components of the unit and their purposes, it is important that you read the following information about pressure-cooking and the step-by-step instructions before you begin to cook.

Pressure cookers create moist heat under pressure to cook the food. Moist heat cooking requires a cooking fluid, generally water; however, more advanced cooks may wish to use wine or other flavored liquids instead. Because the cooking process is done in a sealed vessel, very little liquid is lost. Hence, you will need only about 8 oz. more liquid than is needed for the finished dish. You can achieve the best results by following these simple step-by-step instructions:

1. Prepare your ingredients using the recipe you have selected.

2. If you are cooking vegetables, soups, or desserts, skip to step 5.

3. Many meat and poultry recipes call for braising. To braise, pour the required amount of cooking oil called for in the recipe into the cooker and preheat uncovered over medium heat for 1 to 2 minutes.

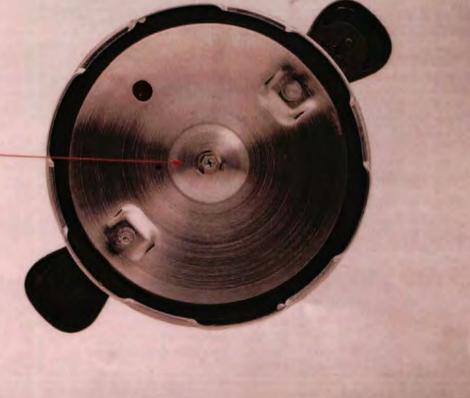
4. Put the meat or poultry in cooker and sear thoroughly on all sides until it is deep brown and crisp. Monitor the heat to prevent burning. Season. Less seasoning may be required, as foods cooked in a pressure cooker retain more of their natural flavor. Remove pressure cooker from heat and allow it to cool slightly before adding liquid to the unit.

5. Pour the amount of liquid called for in the recipe into the pressure cooker.

Handy Tip: When preparing more than one item at a time, make sure that the items being prepared have the same cooking times and temperatures.



Always visually examine the steam vent pipe before using your pressure cooker



Case 3:22-cv-00198-KGB Document 1 Filed 08/01/22 Page 25 of 31 6. To lock the lid in place, align the "V" mark on the lid with the arrow on the body handle. Rotate the lid until the cover drops into position. Lock the lid in place by rotating it clockwlse until the lid handle is aligned with the body handle. The pressure cooker lid is properly locked in place when the lid handles are directly above the body handles. **DO NOT OVER-ROTATE THE LID** (Fig F., Fig G.).



7. Place the pressure regulator in the vent pipe, screwing it in until it moves down no further. The pressure regulator will fit loosely on the vent pipe. It will not touch the top of the pressure cooker lid.



8. Heat the pressure cooker until the pressure regulator begins a gentle rocking motion. A medium to high heat setting is best. The safety lock will move up and down, releasing dry air and a little steam. Once the cooker has reached its operating pressure and temperature, the safety lock will seal and remain in the up position until the pressure is released. The overpressure plug will rise slightly and seal as well.

9. Calculate cooking times when the pressure regulator begins to rock gently. Gradually lower the heat to maintain a slow, steady rocking motion. Cook for time indicated in the recipe or cooking chart. When cooking is complete, remove pressure cooker from burner and allow it to cool.

Handy Tip: If the pressure regulator is allowed to rock vigorously, excess steam will escape, too much liquid will evaporate, and the food will burn.

10. Pressure should be reduced in accordance with the recipe or the cooking chart instructions. If the recipe or chart requires that the cooker cool naturally, then set the pressure cooker aside to cool until the pressure is completely reduced. If the recipe or chart requires that the cooker be cooled immediately, then cool the pressure cooker under running water, or place it in a pan of cold water until pressure is completely reduced. You will know this has occurred when the safety lock has dropped below the top of the handle.

11. After pressure has been completely reduced, remove the pressure regulator. Always remove the regulator before opening the cover.

12. To open the lid, turn it counter clockwise until the arrow on the body handle aligns with the "V" on the cover. Then lift the lid toward yourself to keep any steam away from you. If you have difficulty in rotating the lid, there is still some pressure in the unit. Do not force the lid off. Continue to cool the cooker until the safety lock has dropped, and the lid will turn easily.

13. This appliance cooks under pressure. Improper use may result in scalding injury. Make certain unit is properly closed before operation.

14. Do not open the pressure cooker until the unit has cooled and all internal pressure has been released. If the handles are difficult to push apart, this indicates that the cooker is still pressurized—do not force open. Any pressure in the cooker can be hazardous.

15. Food is ready to serve.

## **HOW TO CLEAN YOUR PRESSURE COOKER**

1. Your pressure cooker and all of its components are fully submersible for easy cleanup. Always remove the sealing ring to ensure thorough cleaning of the inside rim of the lid. The sealing ring should be washed with hot, sudsy water after each use. Remove the safety valve in the pressure cooker lid handle for cleaning. To remove the safety valve, turn the lid over and unscrew the safety valve, then remove the valve and spring and wash in warm sudsy water. Clean the hole in the lid handle with a small brush. After cleaning, reinsert the spring and metal shaft of the safety valve and thread gently into place. Be careful not to over-torque the valve.



2. The overpressure plug can also be removed for cleaning by pushing it out of its opening from the top of the cover. After cleaning, reinsert it by pushing the domed side of the plug into the opening from the underside of the lid, until the bottom edge is fully and evenly seated against the underside of the cover (Fig. H).





3. Clean the steam vent pipe with a small brush or pipe cleaner (Fig. I). To clean the vent pipe, unscrew the pressure regulator (Fig. J) on the top of the lid.

4. Minerals in water and foods may darken the inside of your pot. This discoloration will not affect the food cooked in the unit. Mineral stains can be removed by using a solution of water and cream of tartar. Use a tablespoon of cream of tartar for each quart of water. Dissolve the cream of tartar in the water and pour enough solution into the pot to fill completely. Heat to boil. Remove the cooker from the heat and allow it to stand for two to three hours. Remove the pressure regulator and discard the contents. Scour thoroughly with a scrubbing pad, rinse and dry.

5. The outside surface of your cooker may be cleaned with a aluminum cleaner if necessary. If washed in the dishwasher, discoloration may occur. If food residue adheres to the pressure cooker body, clean with a soft brush, or a fine kitchen cleanser.

6. When not in use, store your pressure cooker in a dry place with the lid inverted on the body. If the lid is locked on, the sealing ring could be damaged. 7. Avoid striking the rim of the pressure cooker body with metal cooking utensils, as this could cause nicks in the rim and prevent the pressure cooker lid from forming a proper seal.

8. If the handles loosen, tighten them with a screwdriver.

9. Leakage between the lid and body is usually caused by shrinkage of the sealing ring after prolonged use. Replace the sealing ring, and, whenever you do so, replace the overpressure plug as well. Do not apply cooking oil to sealing ring.

10. The formation of a small amount of moisture under the pressure regulator is normal when cooking first begins; however, it should stop when pressure begins to build and the overpressure plug and safety lock seals. If leakage continues clean or replace the overpressure plug and safety



the overpressure plug and safety lock seals. If leakage continues, clean or replace the overpressure plug and safety lock assembly. If the pressure cooker still fails to seal, the gasket for the safety lock may be cracked.

## **TIPS & HINTS**

Your favorite recipes may be adjusted for use in your pressure cooker by following the cooking chart in this book for the food being prepared. Generally, you can reduce the cooking time for your recipe by 2/3, since pressure-cooking is much faster than other cooking methods. For example, if your ordinary cooking method requires 60 minutes, in the pressure cooker, cooking time will be reduced to 20 minutes. Because there is very little evaporation, the amount of liquid used should be decreased. Use about 8 oz. more liquid than desired in your finished dish. There are many different liquids that can be used in a pressure cooker; wine, beer, bouillon, fruit juices, and water all work excellently. Remember, there must always be water or some other liquid in the pressure cooker to produce the necessary amount of steam.

If a pressure cooker recipe or the cooking chart requires a cooking time of 0 minutes, cook the food only until the pressure regulator begins to rock. Remove the pressure cooker from the heat source and cool according to the recipe. For delicate foods such as custards, fresh vegetables, and serving-size pieces of meat, immediately cool the cooker. For roasts and stews, let the pressure drop of its own accord.

When cooking at high altitudes, the cooking time needs to be increased 5% for every 1,000 feet above the first 2,000 feet. Times should be adjusted as follows:

3.000ft	5% 5,000ft	 15% 7,000ft
4.000ft	10% 6,000ft	 20% 8,000ft

Because pressure-cooking times are increased at altitudes above 2,000 feet, additional cooking liquid will be needed.

# FREQUENTLY ASKED QUESTIONS

# The lid is hard to open or close.

The locking lid on your pressure cooker is designed to create an airtight seal. If you find that the lid becomes difficult to open or close, follow these suggestions:

Hard to close: Press the palm of your hand on the lid area directly opposite the lid handle while moving the lid handle to the closed position with your other hand. After braising meat or poultry, the cover may be difficult to close due to expansion of the pressure cooker body from heating. Allow the pressure cooker body to cool slightly and try again.

Hard to open: Generally, the only reason for the lid to be hard to open is that there is still pressure built up in the cooker. Allow the cooker to continue to cool until the lid is easily opened.

Helpful Hint: To help make the lid easier to open and close, avery light application of cooking oil may be applied to the bottom of the lugs on the pressure cooker body (Fig. K). Using a pastry brush, piece of cloth, or your fingertips, apply a small amount of oil to the lugs, making sure to remove any excess. Never apply cooking oil to the sealing ring.

#### There is more liquid in the pressure cooker than I want. Reduce over low heat to evaporate the excess liquid.

## How do I prevent overcooking?

Accurate timing is essential to preparing a great meal. Always remember to begin the cooking time when the pressure regulator



(Fig. K) has begun to gently rock. Using a kitchen timer will help to ensure that the cooking time is correct. Be sure to follow the recipe instructions for cooling the pressure cooker, as the food will

continue to cook during the cool down period.

What if the food is not completely done after the recommended cooking time? Simply bring the cooker back up to pressure and cook the food a minute or two longer.

## How do I know my pressure cooker is operating properly?

The rocking pressure regulator provides both a visual and audible indicator that your cooker is functioning correctly.

#### What kind of range is best for pressure-cooking?

Your hard anodized pressure cooker is very energy-efficient and will work on all stoves and range tops with the exception of induction ranges.

#### When cooking first begins, is it normal for steam to escape and moisture to form on the cover and between the handles?

Yes. Howerever, if steam continues to vent around the handles and/or cover, the lid may not be fully locked onto the body.

#### The safety lock rises partially and then drops back down when cooking first begins?

The safety lock will move up and down slightly when cooking first begins. The safety lock should remain in the up position once the cooker has sealed. If the safety lock continues to move up and down or rises only partially, tap it lightly with the tip of a knife. If safety lock does not rise and seal, check the following:

- 1. The range is not hot enough.
- 2. The cooker is not fully sealed.
- 3. There is not enough liquid to form steam.
- 4. The gasket for the safety lock needs to be replaced.

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## **COOKING TIMES**

Processing times at 15 pounds pressure, as given in this chart, apply only to altitudes up to 3,000 feet. For higher altitudes please see Tips & Hints section. Do not fill the unit over 2/3 full. When cooking foods that expand during cooking, such as rice or

Do not fill the unit over 2/3 full. When cooking foods that expand during cooking, such as rice or dry vegetables, do not fill over ½ full. Overfilling may cause a risk of clogging the vent pipe and developing excess pressure.

#### **MEATS & POULTRY**

It is best to brown or sear meats and poultry prior to adding liquid for the pressure-cooking process. This will help to lock in flavor. Use a small bit of cooking oil to prevent the foods from sticking.

All roasts listed below refer to a 3 lb. size. Roasts do not require cooling the cooker after the prescribed cooking time. However, on cut pieces of meat or poultry, always cool the cooker to avoid overcooking.

Meat or Poultry	<b>Cooking Time in Minutes</b>	Liquid Added in Cups
Beef Chuck Roast	35	1 1/2
Beef Stew or Short Ribs	25	2
Game Fowl (pieces)	8	1
Game Meat	30	1 1/2
Lamb Chops (1/2" thick)	5	1/2
Leg of Lamb	35-40	1 1/2
Pork Chops (1/2" thick)	5	1
Pork Roast	55	3
Poultry (pieces)	8	1
Poultry (whole)	15	1 1/2
Veal Roast	40	2
Veal Chops (1/2" thick)	5	1/2

#### **FRESH VEGETABLES**

When using the following cooking times, choose the lowest number for a crisper consistency, and the highest number for softer vegetables. Always cool the cooker, as described on page 7, to avoid overcooking.

Vegetable	Cooking Time in Minutes	Liquid Added in Cups
Artichokes	12	1
Asparagus (1" pieces)	0-2	1/2
Beans, Lima (shelled)	1-2	1/2
Beans, Green	1-3	1/2
Beets, Whole (2 1/2" diameter)	12-14	1 1/2
Broccoli - Medium spears	0-2	1/2
Brussels Sprouts	1-3	1/2
Cabbage (2" wedges)	1-3	1
Carrots (whole)	4-7	1
Carrots (sliced)	1-2	1/2
Cauliflower (whole, 6" diameter)	2-5	1
Corn-on-the-Cob	2-3	1/2
Greens (Beet, Spinach, Swiss Chard, Turnip)	0-3	1/2
Okra	1-3	1/2
Peas, Shelled	0-2	1/2
Potatoes (whole, 2 1/2" diameter)	15	1 1/2
Squash (cubed or sliced, 1" thick)	10-12	1 1/2
Sweet Potatoes (whole)	10	1
Tomatoes for Sauces	5	1/2
Turnips (cubed or sliced, 1" thick)	3	1/2

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## DRIED VEGETABLES

DRIED VEGETABLES All of the items below MUST be presoaked to avoid foaming during the cooking process. All cooking times relate to two cups of the dried vegetables. To presoak, add 1-2 tablespoons cooking tablespoon of salt, and cover completely with water. Soak overpight or for a law cooking times relate to and cover completely with water. Soak overnight, or for at least eight oil, one tablespoon of salt, and cover completely with water. hours. Drain, and re-cover with clear water. DO NOT FILL OVER THE PRESSURE COOKER'S CAPACITY.

Dried Vegetable	Cooking Time in Minutes
Black Beans	35
Black-eyed Peas	20
Great Northern or Navy Beans	30
Kidney Beans	25
Lentils	20
Lima Beans	25
Pinto Beans	25

#### SEAFOOD

All of the following seafood items require one cup of liquid for pressure-cooking. Always cool the cooker, as described on page 8, to avoid overcooking.

Seafood	Cooking Time in Minutes
Crab Legs	2
Fish (whole)	6
Fish (steaks or fillet)	2
Lobster Tail (6-8 oz.)	10-12
Salmon (whole)	6
Salmon (steaks or fillet)	2
Shrimp (medium)	2

#### CEREALS

For rice and corn meal, ingredients MUST be added to boiling water prior to placing the lid on the pressure cooker. Stir well. All of the items below are based on 1 cup. If doubling the recipe, also double the liquid required. DO NOT FILL OVER THE PRESSURE COOKER'S CAPACITY.

Cereal	Cooking Time in Minutes	Liquid Added in Cups
Corn Meal (fine, polenta)	5	3
Brown Rice	18	1 3/4
White Rice	6	1 1/2
Wild Rice	25	3

