# EXHIBIT 2 Filed Under Seal

# UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI SOUTHERN DIVISION

JOSHUA GLASSCOCK, individually and on behalf of all others similarly situated,

Plaintiff, : Case No.: 6:22-cv-3095-MDH

SIG SAUER, INC.,

v.

Defendant.

# DECLARATION OF THOMAS TAYLOR IN SUPPORT OF SIG SAUER, INC.'S OPPOSITION TO PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

- I, Thomas Taylor, declare pursuant to 28 U.S.C. § 1746:
- 1. I am over the age of eighteen and competent to make this declaration.
- 2. For the period from March 2015 to June 2024, I served as the Chief Marketing Officer and as Executive Vice President of Commercial Sales of Sig Sauer, Inc. ("Sig Sauer"). In those roles, I oversaw Sig Sauer's marketing initiatives and its commercial sales in the United States, which encompass consumer sales.
- 3. I submit this declaration in support of Sig Sauer's suggestions in opposition to plaintiff Joshua Glasscock's ("Plaintiff") motion for class certification ("Motion," ECF No. 121). The facts set forth below are based on my personal knowledge and my familiarity with and access to records maintained by Sig Sauer in the regular course of business. If called as a witness, I could competently testify to the matters set forth in this declaration.

# Sig Sauer Cannot Provide a List of Purchasers in the State of Missouri During the Putative Class Period

4. Sig Sauer is a leading provider and manufacturer of firearms for civilian, military,

and law enforcement applications.

- 5. One of the firearms that Sig Sauer manufactures is the P320 striker-fired pistol ("P320").
- 6. During the period from September 1, 2017 through April 18, 2022 (the "Putative Class Period"), a consumer who wanted to purchase a Sig Sauer firearm, including the P320, could make the purchase in Missouri in many different ways. They included:
  - a big box retailer, such as Academy Sports + Outdoors or Bass Pro Shops;
  - a federally-licensed (FFL) firearms dealer;
  - a gun show;
  - an online retailer; and
  - attending outdoor industry fund raising events hosted by organizations such as:
     National Rifle Association, Ducks Unlimited, National Wild Turkey Federation,
     and others similar in nature.
- 7. Consumers could also purchase a P320 via a secondary market, such as used gun websites like the Palmetto State Armory, Guns.com, or Gunsbroker.com, used gun retail stores or from friends, family or other third-parties.
- 8. If a consumer purchased a P320 from any of the ways listed in paragraphs 6-7, Sig Sauer would not have a record of the sale. Similarly, a consumer who purchased through any of the methods listed in paragraphs 6-7 may never be exposed to any Sig Sauer advertising or statements prior to their purchase. Even if a particular customer were somehow exposed to any Sig Sauer advertising prior to their purchase in any of these types of transactions, Sig Sauer would not have a record of what they might have seen and when.
  - 9. Only in October 2021 did Sig Sauer begin to accept orders for purchases of firearms

directly from the Sig Sauer website, http://www.sigsauer.com (the "Website"). Sig Sauer does have a record of those purchases. Only 8 individuals using a Missouri address during the checkout process purchased a P320 pistol from the Website during the Putative Class Period.<sup>1</sup>

- 10. The vast majority of P320 sales to consumers occur through authorized retailers of Sig Sauer products. For any consumer sale that was not a direct sale, Sig Sauer can only generate a list of sales to wholesale commercial distributors and commercial retailers within the State of Missouri during the Putative Class Period. Sig Sauer produced this report as SIG-GLASSCOCK00008914 (the "Sales Chart").<sup>2</sup>
- 11. The fact that a given sale, however, is listed on the Sales Chart does not mean that a consumer purchased that P320 during the Putative Class Period or that the sale occurred in the state of Missouri. While a distributor or retailer received that P320 in the state of Missouri, they can choose to send the firearm to another location in another state for ultimate sale to a consumer.
- 12. It also does not mean that other P320s that are not listed on this Sales Chart were not purchased during the Putative Class Period in the state of Missouri. For example, I understand that the named plaintiff, Mr. Joshua Glasscock, purchased his used P320 bearing the serial number 58A146892 from a friend on March 30, 2020. Plaintiff's friend purchased that P320 from Academy Sports + Outdoors in Springfield Missouri ("Academy") on August 7, 2018. Yet, this

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<sup>&</sup>lt;sup>1</sup> During the Putative Class Period, Sig Sauer also believes that another eight individuals may have made purchases from Missouri through interactions with Sig Sauer's customer service department. These are the only individual consumers that Sig Sauer believes it has a record of purchase that could have occurred in the state of Missouri during the Putative Class Period.

<sup>&</sup>lt;sup>2</sup> The initial version of the Sales Chart was originally produced as SIG-GLASSCOCK0000001, which was overinclusive because it included P320s sold to law enforcement agencies and did not identify the distributor or retailer by name. Sig Sauer produced another version SIG-GLASSCOCK00001772 (reproduced by Sig Sauer as SIG-GLASSCOCK00008802), which Mr. Edward Stockton referenced in his expert report. *See* Stockton Report at 16. The version Mr. Stockton relied upon inadvertently excluded commercial sales from certain events, including NRA events. As such, Sig Sauer produced the Sales Chart to correct the error.

P320's serial number does not appear on the Sales Chart.

- 13. Similarly, the date on the Sales Chart reflects the date the P320 was transferred to the wholesaler or retailer. The ultimate sale to the consumer could have occurred any time after that, including after the end of the Putative Class Period.
- 14. Moreover, even if a consumer purchased the P320 from a retailer identified in the Sales Chart that was located in Missouri, that consumer could have later sold the pistol. Or, similar to the Plaintiff's transaction in this case, the initial purchaser could have sold it used to another individual. In that instance, the initial purchaser is not within Plaintiff's proposed class definition, which I understand excludes "individuals who no longer own a P320 pistol without an external thumb safety." *See* Motion at 31. Secondary sales information cannot and is not reflected in the Sales Chart as Sig Sauer does not have a record of that secondary sales transaction.
- 15. Further, consumers often purchase firearms for a variety of reasons; for example, law enforcement officers are often permitted to purchase their service weapons that are used in their line of duty, or business owners may have purchased firearms to be used by their employees. Except for Sig Sauer's direct sales to law enforcement or military consumers (which are already excluded from the Sales Chart), Sig Sauer cannot determine which consumers purchased their P320s for personal use or whether they are purchasing them to use at their job or for their business.
- 16. I also reviewed Ms. Carla Peak's declaration at paragraph 13 (Plaintiff's Ex. 28) where she states that "It is my understanding that Defendant possesses names and email addresses and/or postal addresses for a portion of the class." As explained in paragraph 9 above, Sig Sauer can only verify that potentially up to 16 P320 purchases occurred in Missouri during the Putative Class Period and provide the names and/or contact information for those individuals. This represents a small fraction of what is likely the total P320 sales during the Putative Class Period.

17. For all these reasons, the Sales Chart does not identify a list of consumers who purchased a P320 in the state of Missouri during the Putative Class Period.

# Sig Sauer Uses a Segmented Marketing Strategy and Its Advertising Varied Throughout the Putative Class Period

- 18. Sig Sauer uses various advertising channels to market its firearms for the commercial market in the United States, including a variety of digital and print sources.
- 19. Sig Sauer's digital advertising includes its Website, a variety of different social media platforms, influencers, digital advertisements on third-party websites and television advertisements.
- 20. Sig Sauer's print advertising includes print materials such as posters sent to Sig Sauer's authorized retailers, brochures, product catalogs that are issued on a yearly basis to distributors and retailers and placed on Sig Sauer's Website, advertisements in magazines such as Recoil Magazine and Guns & Ammo Magazine; trade shows; and other in-person advertising methods.
- 21. Sig Sauer's marketing strategy is segmented, meaning that Sig Sauer tailors particular advertisements and marketing campaigns to specific consumer groups and subgroups.
- 22. Specifically, Sig Sauer uses different advertisements depending on the advertising channel—that is, whether the advertisement is displayed in print or online, and the particular advertising source it will be placed in.
- 23. Sig Sauer also advertises its products differently across its different customer groups, including the commercial, law enforcement, government, and military customer groups. For example, Sig Sauer creates different product catalogs and brochures each year that are distributed specifically to a given group, including the Global Defense Force product catalog intended for the military and government, the Law Enforcement Catalog intended for law

enforcement agencies, and the "Product Catalog" intended for United States commercial wholesalers and retailers.

- 24. In addition, Sig Sauer will often use a given advertisement for a limited time period only as part of a specific marketing campaign to announce the launch of a product or feature in a specific channel.
- 25. Sig Sauer cannot identify whether any consumer was exposed to any of its advertising and, if so, through which type of marketing or when they would have been exposed to the advertising.

### Sig Sauer's Website

- 26. The Website is used by Sig Sauer to market to various segments of its customer base, including some portions targeted at consumers. Sig Sauer cannot identify specific visitors to its Website. The Website changed significantly throughout the Putative Class Period and was updated regularly. A user could have gone to the main website address directly or could have come to a subpage of the Website directly by using a search engine.
- 27. From the home page of the Website, users can navigate to the landing page for the P320 by clicking on "Products" and then "Firearms" and selecting the P320 (the "P320 Landing Page"). From at least 2017 to November 2020, the P320 Landing Page had the URL address <a href="https://www.sigsauer.com/products/firearms/pistols/p320/">https://www.sigsauer.com/products/firearms/pistols/p320/</a>, and from November 2020 to present, it had the URL address: <a href="https://www.sigsauer.com/firearms/pistols/p320.html">https://www.sigsauer.com/firearms/pistols/p320.html</a>.
- 28. For the first few years of the Putative Class Period, between January 2017 and November 2020, users visiting the P320 Landing Page could also navigate to a separate webpage introducing the P320 by clicking on a link called "EXPLORE THE P320," which directed users to a page with the URL address <a href="http://www.sigsauer.com/edu/meet-the-p320/">http://www.sigsauer.com/edu/meet-the-p320/</a> (the "Meet the P320

Page"). The Meet the P320 Page was deactivated by November 2020.

29. Both the content of the P320 Landing Page and the Meet the P320 Page, as with the Website content generally, changed significantly throughout the Putative Class Period.<sup>3</sup>

### Plaintiff's Cited Advertisements

30. I have reviewed the Motion and Plaintiff cited only a handful of advertisements used by Sig Sauer related to the P320 during the Putative Class Period. As Plaintiff's Motion did not identify the source of the advertisement or when it was used, I have provided that information below to put the limited sampling of P320 advertisements in context and to explain the various marketing claims contained therein.

### SHOT Show® Marketing

31. Plaintiff's Ex. 1 is an advertisement that was created on July 1, 2016 as part of an in-person presentation for the SHOT Show®<sup>4</sup> held in January 2017 in Las Vegas, Nevada. Ex. 1 was only displayed before the start of the Putative Class Period and an individual in Missouri would not have encountered the advertisement unless they attended SHOT Show®. Ex. 1 contains the marketing claims "WE'LL TAKE IT FROM HERE" and "Easiest, Safest Takedown." Plaintiff's Motion cited Ex. 1 to display "[a] picture of the P320" captioned with the "WE'LL TAKE IT FROM HERE" statement. See Mot. at p. 9, ¶ 1.

### "Smooth, Crisp Trigger Pull"

32. Plaintiff's Ex. 12 is a compilation of advertisements from product catalogs that

<sup>&</sup>lt;sup>3</sup> Sig Sauer does not retain historical printouts of its Website. Sig Sauer has relied on snapshots of its Website retained by The Wayback Machine, a digital archive of the internet hosted by the Internet Archive.

<sup>&</sup>lt;sup>4</sup> The SHOT Show® is the Shooting, Hunting and Outdoor Trade Show and Conference for the firearms, ammunition, hunting and shooting accessories industry. In addition, the show offers a uniquely diverse Law Enforcement and Armed Forces section for agency and department purchasing agents.

were published in 2017 and 2018. These advertisements contain the statement that the P320 has a "smooth, crisp trigger pull and short tactile reset [that] deliver heightened accuracy." *See, e.g.*, Ex. 12 at SIG-GLASSCOCK 00001727, 30, 31, 33, 34, 35, 38, 39, 40, 50, 51, 52, 54, 55, 56, 58, 60, 62. The statement has also appeared on Sig Sauer's Website pages (including the Meet the P320 Page and P320 Landing Page) at various times throughout the Putative Class Period. The statement "crisp" is synonymous with the term "short" and conveys that the P320 has a short trigger pull. The advertisements in Ex. 12 also confirm that the P320 is "Available with Manual Safety" along with corresponding images of a P320 with a manual safety. *See id.* at SIG-GLASSCOCK 00001736, 39, 42, 52, 56, 62. For example, see Ex. 12 at SIG-GLASSCOCK00001762:



# "Safety Without Compromise"

- 33. Plaintiff's Ex. 22 was produced as SIG-MARKETING-00253 and is a screenshot of the Meet the P320 Page. The content contained in Ex. 22 appears to have been on the Meet the P320 Page only for the limited period of no more than November 2016 through January 2019. The Meet the P320 Page displayed several images that changed over time so even two individuals who visited that page on the same day might see different images from one another, including images that differed from those shown in Ex. 22.
- 34. I understand that Plaintiff highlighted certain marketing claims shown in Ex. 22, including the statement "Safety Without Compromise" and, directly below that header, "We've designed safety elements into every necessary feature on this pistol. From the trigger, to the striker and even the magazine, the P320 won't fire unless you want it to." *See* Ex. 22 at 2. Plaintiff cites Ex. 22 as support for his assertion that "Sig Sauer marketing touts the safety of the P320." *See* Mot. at p. 24 ¶ 56.
- 35. This language referenced one of the innovations of the P320, the fact that a user did not have to depress the trigger to disassemble and clean the P320. Sig Sauer introduced the P320 as a competitor to Glock firearms, which required users to have to depress the trigger to remove the slide and there were numerous reports of inadvertent discharges resulting in personal injuries when a Glock user forgot to empty the chamber before pulling the trigger to disassemble the pistol.
- 36. Throughout the Putative Class Period, Sig Sauer has displayed in various advertisements and website pages the marketing claim "Safety Without Compromise." While Sig Sauer has modified the statement's language slightly, the statement has always referred to the P320's feature that users do not have to depress the trigger to disassemble and clean the P320.

- 37. A true and correct copy of Sig Sauer's 2018 Product Brochure is attached hereto as **Exhibit A** bearing the Bates stamping SIG-MARKETING-000083, which stated the "Safety Without Compromise" slogan and listed "Striker Safety"; "Disconnect Safety"; and "3-Point Takedown System."
- 38. Attached hereto as **Exhibit B** is a true and correct copy of a Wayback Machine Archive of the P320 Landing Page available at <a href="https://web.archive.org/web/20180407093554/https://www.sigsauer.com/products/firearms/pistols/p320/">https://web.archive.org/web/20180407093554/https://www.sigsauer.com/products/firearms/pistols/p320/</a>, depicting the webpage as it appeared on April 7, 2018, which stated "SAFETY WITHOUT COMPROMISE. Safety isn't negotiable. The P320 maximizes peace of mind with a robust safety system. Never again will you need to pull the trigger to disassemble your pistol. And you won't need a tabbed trigger safety for your gun to be drop safe."
- 39. Attached hereto as Exhibit C is a true and correct copy of a Wayback Machine Archive of the P320 Landing Page available at https://web.archive.org/web/20200219183842/https://www.sigsauer.com/products/firearms/pistol s/p320/, depicting the webpage as it appeared on February 19, 2020, which stated "SAFETY WITHOUT COMPROMISE. Safety isn't negotiable. The P320 maximizes peace of mind with a robust safety system including both a striker safety and a disconnect safety, and because of its innovative 3-point takedown safety, never again will you need to pull the trigger to disassemble your pistol."
- 40. Examples of various iterations of the "Safety Without Compromise" claim are summarized below in Figure 1:

Figure 1: Examples of "Safety Without Compromise" Statements

Source and	Date	Statement			
Citation	Published				
Plaintiff's Ex.	Between	SAFETY WITHOUT COMPROMISE.			
22.	November	We've designed safety elements into every necessary feature of			
	2016	this pistol. From the trigger, to the striker and even the			
	through	magazine, the P320 won't fire unless you want it to.			
	January				
	2019				
2018 Product	2018	"Safety Without Compromise" slogan, which listed "Striker			
Brochure		Safety"; "Disconnect Safety"; and "3-Point Takedown System."			
Exhibit A.					
P320 Landing	April 7,	SAFETY WITHOUT COMPROMISE.			
	2018	Safety isn't negotiable. The P320 maximizes peace of mind			
Exhibit B.					
P320 Landing	February	SAFETY WITHOUT COMPROMISE			
_	_	Safety isn't negotiable. The P320 maximizes peace of mind			
	,	1			
Exhibit C.					
		* '			
Page	April 7, 2018 February 19, 2020	Safety isn't negotiable. The P320 maximizes peace of mind with a robust safety system. Never again will you need to pull the trigger to disassemble your pistol. And you won't need a tabbed trigger safety for your gun to be drop safe.			

Sig Sauer Always Informed Consumers that M17s and M18s Were the Commercial Versions of the MHS Contract Pistols

- 41. Under the MHS Contract, Sig Sauer is contracted with the U.S. Army as the provider of its official standard-issue service pistol, the XM17 and/or the XM18 (the "MHS Contract Pistols").
- 42. Plaintiff's Motion at p. 26 ¶ 66 states that Sig Sauer's "advertisements further conceal the Defect by equating the standard P320 (with no external safety features) with the [MHS Contract Pistols] (both of which include a manual safety)." Plaintiff's Motion cites three advertisements (Exs. 25-27) that Plaintiff claims "demonstrate how Sig Sauer advertises the P320 specifically—without reference to the [MHS Contract Pistols]—by depicting individuals in

military combat fatigues." *Id.* at p. 27 ¶ 68.

- 43. Plaintiff's Ex. 25 is a digital advertisement that was displayed only during the month of March 2021 as part of a limited campaign in various third-party publications, including Carbon Media/TFB Forums, Gear Fire, Guns America, Gun Talk (Cross/Hunt Ammo), and The Wire. Ex. 25 states "HAPPY P320 DAY: THE OFFICIAL SIDEARMS OF ALL BRANCHES OF THE U.S. MILITARY" and depicts individuals in military fatigues using only the commercial variants of the MHS Contract Pistols, the M17 and M18s, not other models of the P320. These commercial variants of the M17 and M18 pistols originally came equipped with manual thumb safeties as a standard feature, like the MHS Contract Pistols.
- 44. Plaintiff's Ex. 26 is a draft of a print advertisement that was created in March 2016 by one of Sig Sauer's third-party advertising partners. Ex. 26 states "ONE FOR ALL" and displays five individuals shooting different model P320s, only one of whom is wearing camouflage fatigues. Ex. 26 was published in the July/August 2016 print edition of Recoil Magazine. A true and correct copy of the final published advertisement excerpted from the digital archived of the magazine is attached here as **Exhibit D**. The slogan "ONE FOR ALL" was displayed in both print and digital advertising throughout the Putative Class Period, and it was intended to highlight the modular nature of the P320, which allows users to personalize their P320s based on their anticipated use of the product.
- 45. Plaintiff's Ex. 27 is a print poster that was created in June 2018 and distributed internally to the salesforce as well as commercial dealers. Ex. 27 states that "Based on the P320 the M17 is the U.S. Army's Choice Today & Tomorrow" above a title stating "M17 THE CHOSEN ONE." Ex. 27 explicitly states that the MHS pistols are only based on the P320 and that the M17 is the version of the P320 that is modeled off the MHS Contract Pistols.

- 46. In addition, throughout the Putative Class Period Sig Sauer and the U.S. Army repeatedly confirmed that the MHS Contract Pistols are separate from the P320.
- 47. Sig Sauer publicly announced the MHS Contract on January 20, 2017. Attached hereto as **Exhibit E** is a true and correct copy of Sig Sauer's Press Release, dated January 20, 2017, which displayed a picture of the military version of the XM17 containing an external manual safety.
- 48. In March 2018, when the Army announced that other branches of the United States Military were also selecting the MHS Contract Pistols as their standard-issue service pistol, Army Chief of Staff General Mark Milley stated "the guts and the internals of the military version of that weapon are different than what you're going to buy in the gun store or what police are going to be fielded." Attached hereto as **Exhibit F** is a true and correct copy of an article titled "Gen. Milley: The XM17 is altogether different than the P320" published in Guns.com dated September 19, 2017, available at <a href="https://www.guns.com/news/2017/09/19/gen-milley-the-xm17-is-altogether-different-than-the-p320">https://www.guns.com/news/2017/09/19/gen-milley-the-xm17-is-altogether-different-than-the-p320</a>.
- 49. Further, another article stated that "[t]hough based on the P320 series of modular handguns, both Sig and the military have stressed that the M17/18 series are not the same animal as their civilian predecessor." Attached hereto as **Exhibit G** is a true and correct copy of an article titled "All military branches set to issue Sig Sauers M17 Modular Handgun System" published in the Defence Monitor Worldwide dated March 21, 2018.
- 50. It was not until later that Sig Sauer began to manufacture commercial variants of the MHS Contract pistols. In July 2018, Sig Sauer made the P320-M17 available to commercial consumers and announced that it "comes standard with a manual safety." Attached hereto as **Exhibit H** is a true and correct copy of the document bearing the Bates stamping SIG-

### GLASSCOCK00006703.

- 51. Similarly, in December 2019, Sig Sauer made the P320-M18 available to commercial customers and announced that it contained "an ambidextrous manual safety." Attached hereto as **Exhibit I** is a true and correct copy of a news article titled "SIG Sauer unveils commercial version of the military's M18" published in The Union Leader dated December 6, 2019.
- 52. Sig Sauer repeatedly publicly advertised that the P320-M17/P30-M18 were the versions of the P320 that were the commercial versions of the MHS Contract Pistols and that these versions defaulted to come with a manual safety feature. These advertisements also displayed pictures of the models, showing they were equipped with a manual safety.
- that was produced bearing the Bates stamping SIG-GLASSCOCK00008803. That document was a 2021 P320 Catalog that was intended for United States commercial wholesalers and retailers and available on the Website. At page 8812, the catalog displayed images of the P320-M17 and P320-M18, and clearly stated that these versions of the P320 were "civilian versions of the [MHS Contract Pistols], which are the official sidearms of all branches of the U.S. Military." In at least three locations on that page, the catalog states that the P320-M17 and P320-M18 are equipped with an "Ambi-manual safety" and both images of the firearms depict that ambi-manual safety. *Id.*

# Owners' Manuals Are Not Marketing Materials and Not Viewed by Customers Prior to <u>Purchase</u>

- 54. Sig Sauer does not consider owner's manuals as a form of advertising to customers.
- 55. Typically, owners' manuals are not read by customers prior to purchase. During the Putative Class Period, owner's manuals were included within the product box.
  - 56. The marketing department did not oversee the P320 owner's manuals or have

responsibility for their content.

# Sig Sauer Cannot Determine How Much Any Missouri Consumer Would Have Paid for the P320

- 57. Sig Sauer does not set retail prices for its firearms, including the P320. Those prices are set by the business making the retail-level sale to the customer. As explained above, Sig Sauer does not have records of those sales transactions.
- 58. I am also aware there is an active market for used firearms, including the P320, and there are many online resellers that sell used firearms, including marketplaces like the Palmetto State Armory. Prices for used firearms are set by the seller and Sig Sauer plays no role in setting the price nor does it have any records of those sales transactions.
- 59. Sig Sauer does set a Manufacturer Suggested Retail Price ("MSRP") for each of its P320 models. The MSRP is the price that Sig Sauer recommends that retailers sell the product at the point of sale but has no binding effect on a retailer. A retailer's point of sale price can, and often does, vary from the MSRP.
- 60. Pricing in the firearms' market is subject to a variety of market conditions, which can significantly impact the price ultimately paid by the consumer. For example, during the Covid pandemic in 2020-2021, I understand that demand for firearms increased significantly, and I am aware that certain retailers were selling P320s above Sig Sauer's MSRP.

# Sig Sauer Set the MSRP for Comparable Models of P320s Both with and Without a Manual Safety Typically at the Same Price

- 61. Sig Sauer does not consider a manual safety as a feature that increases the price of a P320 model. Instead, the variations in MSRPs between Sig Sauer P320 models are caused by the various other features among these models, including the round size, muzzle length, coloring and graphics, sights, attachments, holster, and other features.
  - 62. The vast majority of models of the P320 are not sold with identical features except

for whether they are sold with and without a manual safety feature. During the Putative Class Period, there were certain models that were identical in terms of the features except for the manual safety feature.

- 63. Sig Sauer has been able to determine commercial demand for its features, including a manual safety feature, through demand for given products. Based on the sales of P320s since their introduction in 2014, customers vastly preferred purchasing a P320 without a manual safety feature.
- 64. Because there is significantly less consumer demand and fewer sales for models with a manual safety feature, Sig Sauer has only manufactured a limited number of P320 models with external manual safeties.
- 65. For example, as illustrated below in Figure 2, across all global sales to commercial, law enforcement, and military consumer groups, the yearly sales for P320, M17, and M18 models without manual safeties greatly exceeded those with manual safeties:

Figure 2: Comparison of P320, M17, and M18 Model Sales With and Without Manual Safeties

Year	Total Sales Without Manual Safeties	Total Sales With Manual Safeties
2017	263,469	108,236
2018	190,196	137,417
2019	260,413	47,822
2020	299,463	122,563
2021	421,895	85,118
2022	370,218	127,882
Total	1,805,654	629,038

66. Overall, from 2017 to 2022, Sig Sauer had sold 2,434,692 P320s, M17s, and M18s across all markets including commercial, law enforcement, military and government.

# Press Coverage on the P320 and Sig Sauer's Responses

67. Plaintiff's Motion claims that "[s]everal national news outlets—like ABC News and the Washington Post— have reported on consumers across the country who have been injured due to inadvertent discharges of the P320." Motion at p. 18 ¶ 47. As I explain below, Sig Sauer evaluated this news coverage and determined that these P320 inadvertent discharge incidents resulted from user error rather than a defect with the P320.

### The 2021 ABC News Hilton Story and Lawsuit Dismissal

- 68. Plaintiff references the 2021 news article *Detective sues Sig Sauer after she says* her holstered P320 handgun nearly killed her, (Aug. 24, 2021), <a href="https://abcnews.go.com/US/detective-sues-sig-sauer-holstered-p320-handgun-killed/story?id=79605906">https://abcnews.go.com/US/detective-sues-sig-sauer-holstered-p320-handgun-killed/story?id=79605906</a> (Motion at p. 18 ¶ 47). A true and correct copy of this article is attached hereto as **Exhibit K**. This article reports on a P320 inadvertent discharge incident involving Brittney Hilton, a detective with the Bridge City Police Department in Texas.
- August 24, 2023 (Exhibit K). Initially, the story featured commentary from firearms expert and ABC News consultant Joshua Harrison, who stated he "agrees there was a problem with the P320 [i.e., the drop fire issue], but he believes it's been fixed." *Id.* Mr. Harrison clarified that "I have not seen enough to convince me that the upgraded version's dangerous." *Id.* In particular, Mr. Harrison stated "I do not have an explanation for why the updated version should have these complaints from trained individuals. If it's not legal momentum, then it would have to be some other mechanism of failure." *Id.* (emphasis added). It is my understanding that by "legal

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<sup>&</sup>lt;sup>5</sup> Plaintiff references another print ABC News article also covering the Hilton story that appears nearly identical to the August 24<sup>th</sup> article. *See* Motion at p. 22 ¶ 53 (citing *Semi-automatic police service gun goes off by itself, nearly killing detective*, ABC News (August 25, 2021), <a href="https://abc11.com/sig-sauer-lawsuit-p320-pistol-brittney-hilton-accidental-discharge/10974219/">https://abc11.com/sig-sauer-lawsuit-p320-pistol-brittney-hilton-accidental-discharge/10974219/</a>).

momentum," Mr. Harrison was commenting that filing lawsuits related to the P320 might encourage others experiencing inadvertent or negligent discharges to also sue and argue that there was "defect."

70. Subsequently, however, ABC News again ran the Hilton story in its Nightline segment and edited Mr. Harrison's commentary by removing the entire sentence "I do not have an explanation for why the updated version should have these complaints from trained individuals. If it's not legal momentum, then it would have to be some other mechanism of failure." The ABC News Nightline segment is available at the video linked here, with Mr. Harrison's revised commentary starting at 9:15: https://abcnews.go.com/Nightline/video/detective-sues-sig-sauerholstered-p320-pistol-wounded-79633594.

Det. Hilton sued Sig Sauer over the incident in the lawsuit *Hilton v. Sig Sauer, Inc.*, 71. No. 1:21-CV-00441-MJT (E.D. Tx. 2021). At summary judgment, the court found Ms. Hilton was "carrying the loaded pistol in her purse, along with other loose items, when it discharged," and "[s]pecifically, the firearm discharged in Ms. Hilton's purse as she walked around her desk in her office, just after she put a bottle of body spray into the purse and looped the purse over her arm." Hilton, No. 1:21-CV-00441, Order dated June 8, 2023, ECF No. 65 at 1 ("Order"). Attached hereto as **Exhibit L** is a true and correct copy of the Order. The court held that "proof of an unintended discharge is not proof of a defect," "[n]or is proof of many unintended discharges," and because "no reasonable jury could conclude that a defect caused Plaintiff's gun to discharge without a trigger pull solely from (1) lay testimony that her gun discharged without a

Zone (Feb. 18, 2024), available at https://thegunzone.com/is-it-bad-to-carry-a-firearm-in-a-purse/ ("Carrying a firearm in a purse increases the risk of accidental discharge").

<sup>&</sup>lt;sup>6</sup> It is common knowledge (and common sense) that carrying a loose pistol in a purse is an unsafe practice. Even if holstered, loose items could manipulate the pistol's parts such as the trigger or safety toggle. A Google search "is it safe to carry a gun in your purse" reveals blog posts advising users of the inadvertent discharge risks. See, e.g., Is it bad to carry a firearm in a purse?, The Gun

trigger pull and (2) the existence of other similar alleged incidents." *Id.* at 18. The court granted summary judgment in favor of Sig Sauer and dismissed all of Ms. Hilton's claims. *Id.* 

## The 2023 Washington Post Article

- 72. Plaintiff's Ex. 18 is the article *Popular handgun fires without anyone pulling the trigger, victims say*, Wash. Post (April 11, 2023) (the "Washington Post Article"). In the month leading up to the Washington Post Article, Sig Sauer engaged in a lengthy discussion with Washington Post reporters Champe Barton and Tom Jackman concerning the accuracy of the article.
- 73. Attached hereto as **Exhibit M** is a true and correct copy of a letter, dated March 24, 2023 from Sig Sauer to the Washington Post bearing the Bates stamping beginning at SIG-GLASSCOCK00000255, which was Exhibit 13 to my deposition on September 12, 2024 (the "March 24 Letter"). In the March 24 Letter, Sig Sauer explained that "[t]hese reports, among others, support three conclusions: (1) unintentional discharges are not uncommon amongst both law enforcement and civilians, (2) improper or unsafe handling is one of the most common causes of unintentional discharges, and (3) unintentional discharges occur with several types of firearms and are not unique to the P320. Independent investigations into reports of P320 unintentional discharges demonstrate evidence of improper or unsafe handling and confirm that these incidents could have been prevented if fundamental rules of firearms safety were followed." Therefore, Sig Sauer stated that it "is confident in the design of the P320, and the ability of all consumers to use the P320 safely when fundamental rules of firearms safety are followed."
- 74. After some back-and-forth email correspondence in the following two weeks, the Washington Post indicated it still intended to publish the article. Attached hereto as **Exhibit N** is a true and correct copy of email correspondence from March 27 to March 30, 2023 between

Docusign Envelope ID: B94AD4EF-6558-49CE-838C-52063A01A452

Samantha Piatt, Champe Barton, and Tom Jackman, bearing the Bates stamping beginning at SIG-

GLASSCOCK00000257, which was Exhibit 14 to my deposition on September 12, 2024.

75. Sig Sauer then sent a follow-up letter on March 30, 2023 to the Washington Post.

Attached hereto as **Exhibit O** is a true and correct copy of the letter dated March 30, 2023 from

Sig Sauer to the Washington Post bearing the Bates stamping beginning at SIG-

GLASSCOCK00000250, which was Exhibit 15 to my deposition on September 12, 2024 (the

"March 30 Letter").

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 17, 2025

Portsmouth, New Hampshire

DocuSigned by:

— CAABBCCB Thomas Taylor

# **Tom Taylor Declaration** Ex. A

# P320 THE NEW STANDARD IN STRIKER-FIRED PISTOLS. when it counts CONFIDENT ALSON FORM A PONT-MDH Document 188-2 Filed 08/08/25

# P320°









# **EXCEPTIONAL TRIGGER**

A smooth, crisp trigger pull and short tactile reset deliver heightened accuracy.

### SAFETY WITHOUT COMPROMISE

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From calibers, to pistol size, to the grip fit best suited for the shooter, the P320 is the most adaptable pistol available today.

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- Available in 9mm, .357SIG, .40S&W, .45ACP
- 3 grip sizes Small, Medium, Large
- Double-Action Striker Fired operating system
- SIGLITE® Night Sights or Contrast Sights
- Steel Magazine
- Full-length steel slide rails
- Integral M1913 Accessory Rail on Full, Compact, Carry (all grip sizes), and Subcompact (medium grip size only)

# THE NEW STRIKER-FIRED STANDARD IN MODULARITY AND ADAPTABILITY.

The ultimate freedom to change calibers, size, and fit.



Available with a Manual Safety

# P320°

SPECIFICATIONS	Full-Size	Carry	Compact	Subcompact
Caliber	9mm /.357SIG /.40S&W /.45ACP	9mm /.357SIG /.40S&W /.45ACP	9mm /,357SIG /.40S&W /.45ACP	9mm /.357SIG /.40S&W /.45ACP
Overall Length	203 mm / 8.0 in	183 mm / 7.2 in	183 mm / 7.2 in	170 mm / 6.7 in
Overall Height	140 mm / 5.5 in	140 mm / 5.5 in	135 mm / 5.3 in	119 mm / 4,7 in
Barrel Length	119 mm / 4.7 in	99 mm /3.9 in	99 mm / 3.9 in	91 mm / 3.6 in
Sight Radius	168 mm / 6.6 in	147 mm / 5.8 in	147 mm / 5.8 in	140 mm / 5.5 in
Sights	SIGLITE® Night Sights or Contrast Sights	SIGLITE Night Sights or Contrast Sights	SIGLITE Night Sights or Contrast Sights	SIGLITE Night Sights or Contrast Sights
Weight with Magazine	833 g / 29.4 oz	737 g / 26.0 oz	737 g / 26.0 oz	708 g / 25.0 oz
Slide Material	Stainless Steel	Stainless Steel	Stainless Steel	Stainless Steel
Slide Finish	Nitron®	Nitron	Nitron	Nitron
Frame Material	Stainless Steel	Stainless Steel	Stainless Steel	Stainless Steel
Magazine Capacity	17/14/14/10	17/14/14/10	15/13/13/9	12/10/10/6
Trigger	Double-Action Striker	Double-Action Striker	Double-Action Striker	Double-Action Striker
Trigger Pull	24.5 - 33.4 N / 5.5 - 6.5 lb	24.5 - 33.4 N / 5.5 - 6.5 lb	24.5 - 33.4 N / 5.5 - 6.5 lb	24.5 - 33.4 N / 5.5 - 6.5 lb
Grips	Polymer Grip Module	Polymer Grip Module	Polymer Grip Module	Polymer Grip Module

Specifications are approximate and are subject to change.



SIG SAUER, Inc. 72 Pease Boulevard, Newington, NH 03801 USA \* phone: +1 (603) 610-3000 \* fax: +1 (603) 610-3001 \* www.sigsauer.com
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MICTO082 REV02

# **Tom Taylor Declaration** Ex. B







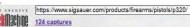




# ONE FOR ALL

A cleaner, crisper, short trigger reset, safe takedown and unprecedented modularity deliver elite performance for all.





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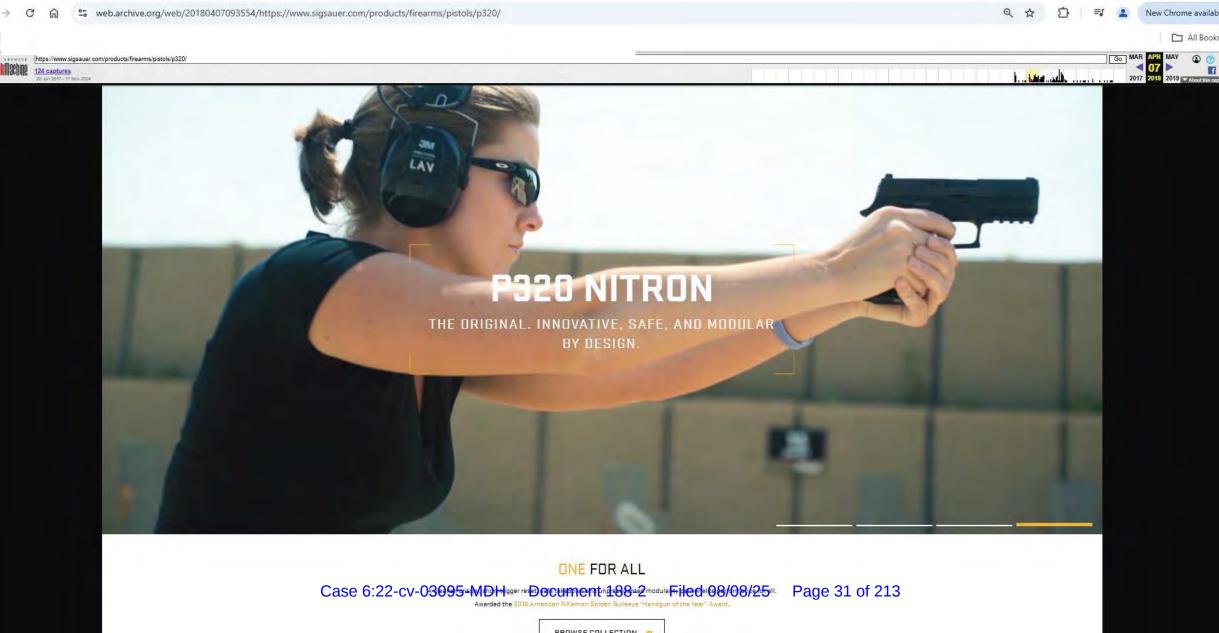
124 captures 28 Jan 2017 - 17 Nov 2024



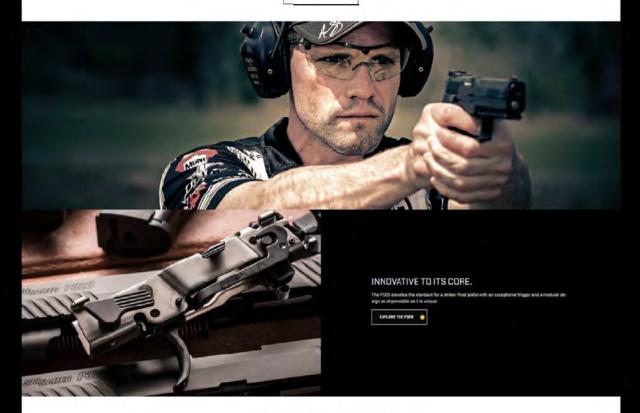
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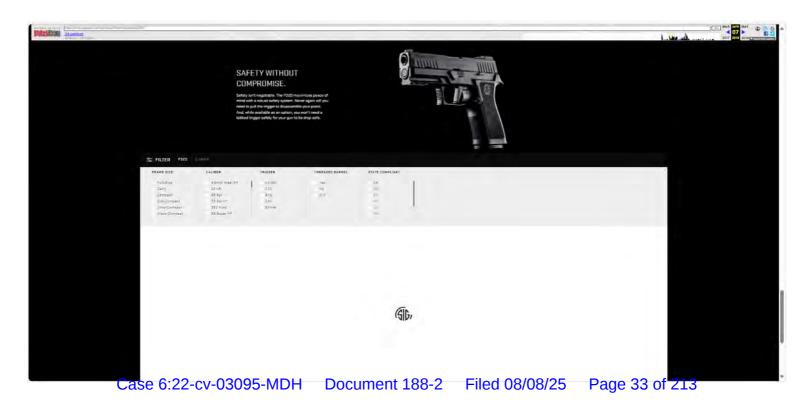
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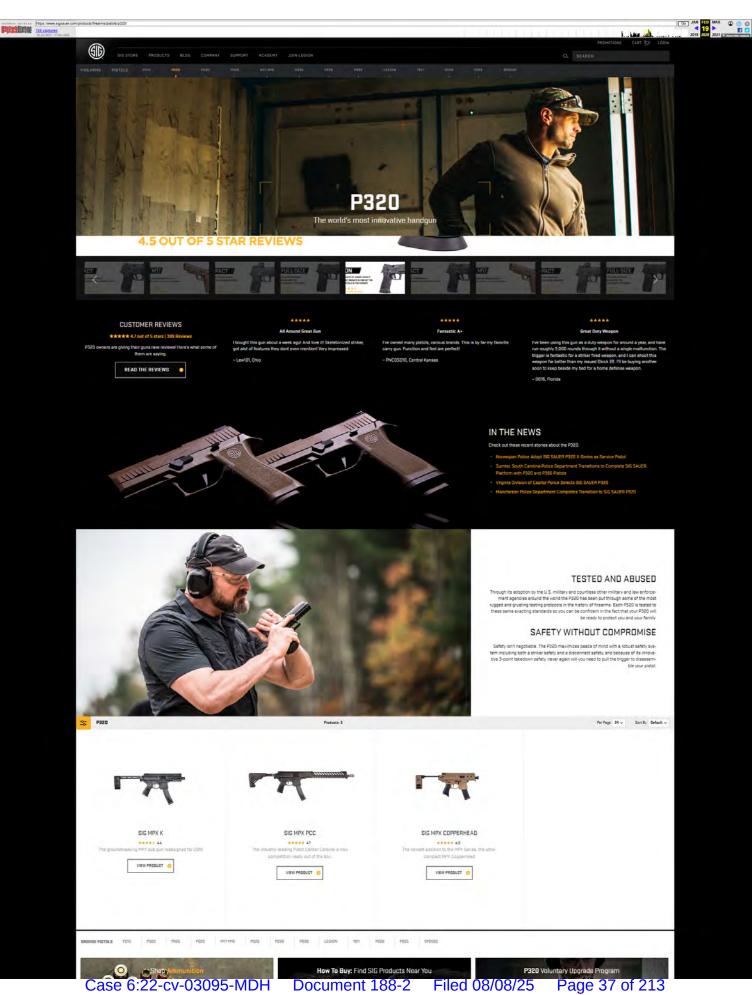






# **Tom Taylor Declaration** Ex. E







# **Tom Taylor Declaration** Ex. F



# **Tom Taylor Declaration** Ex. E

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SIG SAUER, Inc. Awarded the U.S. Army Contract for its New Modular Handgun System (MHS)

January 20, 2017

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SIG SAUER, Inc. Awarded the U.S. Army Contract for its New Modular

# Handgun System (MHS)

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SIG SAUER, Inc. announced today that the U.S. Army has selected the SIG SAUER Model P320 to replace the M9 service <u>pistol</u> currently in use since the mid-1980's. Released in 2014, the P320 is a polymer striker-fired pistol that has proven itself in both the United States and worldwide markets. The P320 is the first <u>modular</u> pistol with interchangeable <u>grip</u> modules that can also be adjusted in frame size and caliber by the operator. All pistols will be produced at the SIG SAUER facilities in New Hampshire.

The MHS Program provides for the delivery of both full size and compact P320's, over a period of ten (10) years. All pistols will be configurable to receive suppressors and will also include both standard and extended capacity magazines.

"I am tremendously proud of the Modular Handgun System Team," said Army Acquisition Executive, Steffanie Easter in the release.

"By maximizing full and open competition across our industry partners, we truly have optimized the private sector advancements in handguns, ammunition and magazines and the end result will ensure a decidedly superior weapon system for our warfighters."

Ron Cohen, President and CEO of SIG SAUER, said "We are both humbled and proud that the P320 was selected by the U.S. Army as its weapon of choice. Securing this contract is a testimony to SIG SAUER employees and their commitment to innovation, quality and manufacturing the most reliable firearms in the world."

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# **Tom Taylor Declaration** Ex. F

(/silencers)



Guns.com (https://www.guns.com/ / News (https://www.guns.com/news) / Military & Police (https://www.guns.com/news/category/military-police) / Gen. Milley: The XM17 is altogether different than the P320

## GEN. MILLEY: THE XM17 IS ALTOGETHER DIFFERENT THAN THE P320

09/19/2017 08:00 AM | by Chris Eger (/news/author/chris-eger)



The Army is conducting an Initial Operational Test of a variant of the Sig Sauer P320 as the new XM17 Modular Handgun System this month at Fort Bragg, N.C. in preparation for issuing the pistol to troops later this year. (*Photo: Lewis Perkins/U.S. Army*)

Army Chief of Staff Gen. Mark Milley went on record vouching for the service's new Modular Handgun System and downplayed controversy over its civilian base model.

In an interview with Army Times, Milley detailed (https://www.armytimes.com/news/your-army/2017/09/17/the-armys-new-handgun-is-undergoing-final-testing-before-its-issued-to-soldiers/) the MHS contract winner, a variant of Sig Sauer's P320 pistol adopted as the XM17 earlier this year, is not the same animal as its civilian predecessor.

"But I can tell you with certainty, the guts and the internals of the military version of that weapon are different than what you're going to buy in the gun store or what police are going to be fielded," Milley said.

Sig bested a wide field of competitors including FN, Smith & Wesson and Glock — the latter by more than \$100 million — (https://www.guns.com/news/2017/06/26/sig-beat-out-glock-by-more-than-100-million-on-army-handgun-bid/) on the Army handgun bid, the largest contract of its kind since the 1980s.

After initial tests on the weapon, Milley said the Army requested modifications on the pistol and were pleased with the resulting handgun that Sig submitted.

"We took the modified version and put it through the test, and it passed with flying colors," Milley said.

Addressing safety concerns over the P320 series, the company last month said (https://www.guns.com/news/2017/08/05/sig-sauer-addresses-p320-safety/)they have, "full confidence in the reliability, durability, and safety of its striker-fired handgun platform," and that the design did not encompass the model submitted to the armed forces.

The XM17 is set to be issued first (https://www.guns.com/news/2017/07/25/first-2000-sig-sauer-xm17-pistols-to-be-fielded-with-army-in-november/)to troops of the Fort Campbell-based 101st Airborne Division in November as part of a 190,000-pistol initial buy. The modified P320 will then be fielded to a new installation each month until September 2018, except for next March and April.

Meanwhile, Sig has issued (https://www.guns.com/news/2017/08/08/sig-issues-voluntary-upgrade-for-p320-pistols/)a voluntary upgrade for standard P320 users.



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# **Tom Taylor Declaration** Ex. I

# All military branches set to issue Sig Sauers M17 Modular Handgun System

Defence Monitor Worldwide March 21, 2018 Wednesday

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Length: 321 words

# **Body**

Though originally a winner for an Army contract, Sig officials report that every branch including the Coast Guard has placed orders for the modified P320 pistol platform.

Sigs M17/18 pistol, the winner of the Armys Modular Handgun System contract last year, is set to be fielded by not only the land service but the Air Force, Marines and Navy as well as the Coast Guard, according to company representatives.

All services have been involved in MHS since its inception and they have all committed to ordering guns, Tom Taylor, chief marketing officer for Sig Sauer, told Military.com, explaining the other services will begin fielding the 9mm handguns later this year to early next year.

The handguns will begin replacing a host of other platforms, including various marks of the M9 Beretta in the Army. As noted in the Navys FY 2019 procurement budget justification for the Marine Corps, 35,000 of the Sigs will not only replace M9s but also Colt M45A1 CQB .45ACP pistols and the newly acquired M007 Glock. In Coast Guard service, the gun will augment the Sig P229R which was adopted in 2005. The Air Force has been quietly acquiring the guns and testing their use for compatibility with aircraft ejection seats.

Though based on the P320 series of modular handguns, both Sig and the military have stressed that the M17/18 series are not the same animal as their civilian predecessor. Army Chief of Staff Gen. Mark Milley went on record last year, saying, [T]he guts and the internals of the military version of that weapon are different than what youre going to buy in the gun store or what police are going to be fielded.

The first batches of the M17/18 were issued to troops of the Fort Campbell-based 101st Airborne Division last November as part of a 190,000-pistol initial buy. The platform will then be fielded to a new Army installation each month until September 2018, except for next March and April. 2018 Global Data Point.

Load-Date: March 21, 2018

**End of Document** 

# Tom Taylor Declaration Ex. H



PR Contact:
Joel Harris
Director, Media Relations & Communication
(603) 610-3293
joel.harris@sigsauer.com

## FOR IMMEDIATE RELEASE

# SIG SAUER Brings the U.S. Army's M17 to the Commercial Market

**NEWINGTON**, N.H., (July 18, 2018) – SIG SAUER, Inc. is pleased to introduce the commercial variant of the U.S. Army's M17 official service pistol called the P320-M17.

After one of the most rigorous and highly competitive review processes in the history of military firearms the SIG SAUER M17 was awarded the Modular Handgun System (MHS) contract for the U.S. Army. The M17 is a P320-based platform, and was selected for its uniquely innovative modularity, uncompromising performance, and unmatched capability. The P320-M17 closely follows the specifications of the U.S. Army's M17.

"It was truly an honor for SIG SAUER to be chosen as the U.S. Army's choice with the M17. When the selection was announced, civilian interest in the pistol was immediate," said Tom Taylor, Chief Marketing Officer and Executive Vice President, SIG SAUER, Inc. "We are proud to bring this P320-M17 to the marketplace to meet the substantial civilian interest, and the high demand, to own the pistol the Army uses as well as the other branches of the U.S. Military."

The P320-M17 is a 9mm, striker-fired pistol and comes with two 17-round magazines. The pistol features a coyote-tan PVD coated stainless steel slide with the same optic cut as specified by the MHS contract, and black controls just like the pistols currently being shipped to the U.S. Army; it comes equipped with a SIGLITE front night sight and removable Night Sight rear plate. The P320-M17 features a coyote-tan carry-length grip module, available in three sizes, and comes standard with a manual safety. Non-manual safety P320-M17 pistols will be shipped at a later date.

# The P320-M17 Specs:

Total length: 8"	Barrel length: 4.7"	Weight (incl. magazine): 29.6 oz.
Height: 5.5"	Width: 1.3"	Sight radius: 6.6"

MSRP: \$768.00

The P320-M17 is shipping to stores in August 2018.

To complement the P320-M17, an exclusive M17 Collector's Case is available for purchase separately at [HYPERLINK "https://www.sigsauer.com/store/"]. The case is a solid cherry box, with dark mahogany stain, a tempered glass top, a brushed nickel latch, and a keyhole back for optional wall-hanging. The M17 Collector's Case features a slate-grey flocked foam insert with an affixed U.S. Army logo, and precision laser placement cuts for the P320-M17 pistol, and included P320-M17 certificate and P320-M17 Official Challenge Coin.

M17 Collectors Case MSRP: \$199.99 (sold separately at sigsauer.com/store)

Get Social: follow SIG SAUER on [HYPERLINK "https://www.facebook.com/SIGSAUERInc"] [HYPERLINK "https://twitter.com/sigsauerinc"] [HYPERLINK "https://www.instagram.com/sigsauerinc"], and [HYPERLINK "https://www.youtube.com/user/sigsauerinc"] for the latest news, product announcements, events, and updates.

## About SIG SAUER, Inc.

[ HYPERLINK "https://www.sigsauer.com/" ] is a leading provider and manufacturer of firearms, electro-optics, ammunition, Advanced Sport Pellet (ASP) airguns, suppressors, and training. For over 100 years SIG SAUER, Inc. has evolved, and thrived, by blending American ingenuity, German engineering, and Swiss precision. Today, SIG SAUER is synonymous with industry-leading quality and innovation which has made it the brand of choice amongst the U.S. Military, the global defense community, law enforcement, competitive shooters, hunters, and responsible citizens. Additionally, SIG SAUER is the premier provider of elite firearms instruction and tactical training at the SIG SAUER Academy - a world class, state-of-the-art, 140-acre training facility. SIG SAUER is headquartered in Newington, New Hampshire, and has more than 1,700 employees across eight locations, and is the largest member of a worldwide business group that includes SIG SAUER GmbH & Co. KG in Germany. For more information about the company and product line visit: [HYPERLINK "http://www.sigsauer.com"].

###

# **Tom Taylor Declaration** Ex. I

# SIG Sauer unveils commercial version of the military's M18

The Union Leader (Manchester, NH)

December 6, 2019 Friday

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Section: B; Pg. 003 Length: 261 words

Byline: By Kimberley Haas Union Leader Correspondent

# **Body**

NEWINGTON - SIG Sauer has a new commercial version of the company's M18 official duty pistol adopted by the U.S. Marine Corps earlier this year.

The P320-M18 is a 9mm, striker-fired pistol configured nearly identically to the military's model. It features a SIGLITE front night sight and a removable night sight rear plate, black controls, a carry-length coyote-tan grip module, and an ambidextrous manual safety, according to a press release issued by the company on Tuesday.

The M18 is a compact version of the M17. Both are used by the U.S. Army, Navy, Air Force and Coast Guard.

Tom Taylor, chief marketing officer and executive vice president of commercial sales for the Newington company, says the company has seen significant civilian interest in both the M17 and M18 since their releases.

"We are very proud that with the P320-M18, civilians can now own the same innovation and versatility that has made either the M17 and M18 the handgun of choice for all branches of the U.S. Military," Taylor said in a statement.

When the Marine Corps adopted the M18 in June, branches of the U.S. military had more than half a billion dollars in M17 and M18 pistols on order, totaling more than 421,000 handguns.

On Nov. 19, SIG Sauer officials announced the delivery of the 100,000th M17 and M18 to the military for its Modular Handgun System program. Company officials said at that time they were ahead of schedule requirements.

There is no word yet on pricing for the P320-M18. The retail price for the P320-M17 is \$768, according to <a href="https://www.guns.com">www.guns.com</a>.

straffordnews@unionleader.com

Load-Date: December 6, 2019

**End of Document** 

# **Tom Taylor Declaration** Ex. J





Case 6.22-cv-03095-MDH

Document 188-2

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EVOLUTION OF SIG 2

FROM WAGONS TO WORLDWIDE LEADER

U.S. DEFENSE CONTRACTS

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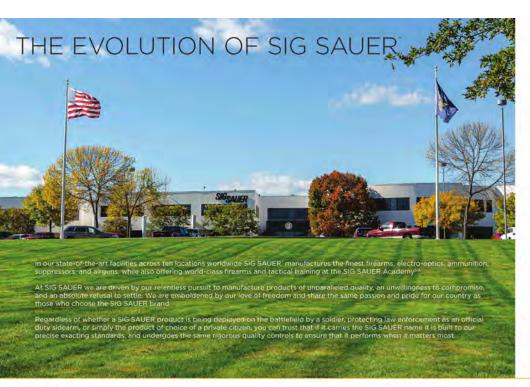
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SIG-GLASSCOCK00008803



#### FROM WAGONS TO WORLDWIDE LEADER

When business entrepreneurs Friedrich Peyer Im Hof, Heinrich Moser, and Conrad Neher opened a wagon factory near the Rhine Falls in Switzerland in 1853, they laid the foundation for what would become the international leader in the small arms industry. Just seven years after constructing an industrial plant for building their wagons and railway cars, the three ambitious owners undertook a new venture responding to a challenge from Switzerland's Federal Ministry of Defense to develop a state-of-the-art rifle in hopes that the Swiss Army would adopt it.

Four years later, the trio found themselves facing an order for 30,000 of their rifles, and changed the name of their company to Swiss Industrial Group. The name was later shortened to SIG as they officially became one of the world's premier firearms manufacturers.

In the 1970's, the SIG small arms division expanded within Europe to include Hammeril Target Arms of Switzerland, and the legendary J.P. Sauer & Sohn, GmbH of Germany - one of Europe's oldest and most prestigious firearms manufacturers.

In the 1980's, SIG set its sights on the United States of America and opened its first American location in Virginia under the name SIGARMS\*, and began importing and assembling the company's classic handguns.

In the 1990's, SIGARMS expanded its United States footprint by opening new manufacturing facilities in Exeter, New Hampshire where it would continue to expand to include the world-class SIGARMS training academy in Epping. New Hampshire.

In 2007, SIGARMS officially changed its name to SIG SAUER, aligning the company under a single global brand. Since then SIG SAUER has experienced unprecedented growth and expanded its New Hampshire footprint to include a 206,000 sq./ft. corporate headquarters and advanced manufacturing facility at Pease International Tradeport.

SIG SAUER continually invests in workforce development by hiring the foremost industry experts in ever expanding categories to ensure that all SIG SAUER products exceed the quality expectations that are synonymous with the brand.

Today, the SIG SAUER product lineup goes well beyond firearms to include a broad array of products such as electro-optics, ammunition, suppressors, and airguns, all designed, engineered, and manufactured to the same exacting standards of quality, reliability, and performance that have made SIG SAUER the brand of choice for the military, special forces, law enforcement, and civilians across the globe. In addition, SIG SAUER has expanded its U.S operations with a dedicated optics facility in Oregon and a purpose-built ammunition plant in Arkansas.

SIG SAUER has evolved because we continually compete against ourselves, because we believe our greatest success has yet to be engineered, and we are driven by the knowledge that our customers can't afford to settle so they trust we never will. SIG SAUER, Never Settle.



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ALL SECONDATION SUBJECTION HAVE T AMERICAN LINE

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SIG-GLASSCOCK0000880

# U.S. DEFENSE CONTRACTS

#### U.S. MILITARY (ALL BRANCHES) M17 / M18

After one of the most rigorous and highly competitive selection processes in the history of small arms, the SIG SAUER' P320' based M17 and M18 were awarded the Modular Handgun System (MHS) contract by the U.S. Army. The M17 and M18 have now been adopted by all branches of the U.S. Military.

#### U.S. ARMY NEXT GENERATION SQUAD WEAPONS (NGSW) PROGRAM

SIG SAUER has been selected by the U.S. Army to develop the Next Generation of squad-based weapon systems, including a lightweight machine gun, a carbine rifle, a next generation of suppressor and the first-of-its-kind hybrid ammunition.

#### U.S. ARMY CONTRACTING COMMAND .300 WIN MAG AMMUNITION

SIG SAUER Ammunition, known for quality and accuracy, was selected by the U.S. Army to manufacture the Mk 248 MOD I and MOD 0 300 Win Mag ammunition for use in U.S. Military Sniper Platforms.

#### DOD SUPPRESSED UPPER RECEIVER GROUP MCX" (SURG)

The SIG SAUER MCX system was selected to upgrade the existing M4A1 U.S. Special Operations Forces carbines and optimize their weapons for continuous suppressed use on the battlefield.

#### U.S. ARMY/DOD/U.S. AIR FORCE TANGO6T

The SIG SAUER Electro-Optics TANGO6T has three times been selected by the Department of Defense as the U.S. Army Squad Designated Marksman Rifle (SDMR), the USSOCOM Squad-Variable Powered Scope (S-VPS), and the Direct View Optic (DVO)

#### DEPARTMENT OF HOMELAND SECURITY (DHS) P320 & ROMEOIPRO

SIG SAUER Electro-Optics ROMEOIPro miniature open reflex sight was chosen by the Department of Homeland Security for U.S. Immigration and Customs Enforcement (ICE) as the official red dot optic for their SIG SAUER P320 official duty pistol.

#### U.S. COAST GUARD PROFORCE P229

SIG AIR\* was chosen to supply the U.S. Coast Guard with the SIG AIR PROFORCE P229. airsoft pistol as an official training pistol for Cadets and Guardsmen



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# INDUSTRY AND CONSUMER AWARDS

SIG SAUER' is proud to be honored by our peers and have our products recognized for innovation, quality, and capability.

#### 2020 TACTICAL RETAILER GOLD LEVEL CHOICE **AWARDS**

Recognized by readers as the best in the industry by tactical retailers across the industry.

**Favorite New Products:** 

AR Pistol

#### 2020 SHOOTING SPORTS RETAILER GOLD LEVEL CHOICE AWARDS

Recognized by readers as the best in the industry by shooting sports retailers across the industry.

Handgun Manufacturer AR Pistol

#### 2020 INDUSTRY CHOICE **AWARDS**

Recognizing fit, form, linish, and functionality in firearms by industry peers.

Innovation of the Year: CROSS Bolt-Action Rife Handgun of the Year: P320 XFIVE LEGION

## 2020 OUTDOOR LIFE AWARDS

Recognizing versatility in riflescopes

Best New Rifle: CROSS Bolt-Action Rifle Best New Spotting Scope: OSCAR8



#### 2019 BALLISTICS BEST READERS'S CHOICE AWARDS:

The Ballistic Best Reader's Choice Awards from Athi Outdoors gives consumers the ability to vote for recognition of superiority in class, quality, and innovati across various product categories.

Best Semi-Auto Riffe: M400 TREAD Best Compact Semi-Auto: P320 XCOMPACT

2020 BALLISTICS BEST READERS'S CHOICE AWARD:

Best AR-10 Rifle 716/ TREAD

#### 2020 NASGW-POMA CALIBER AWARD

Recognizing new and innovative products within the sporting goods

Best New Optic: ROMEOZero



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SIG-GLASSCOCK00008803



#### INSPIRED BY THE ELITE PROFESSIONAL. CARRIED BY ALL WHO DEMAND THE BEST.

Unless it's a SIG, a handgun is just a handgun. Engineered to perform anywhere, at any time, and under any circumstance, SIG pistols boast unique, advanced features that stand out amongst the rest. Key features

















#### SIZING UP YOUR SITUATION

You want a pistol with frame dimensions directly suited to your needs. Whether you'll be sliding your handgur into a range bag, concealing it in a purse, shooting competitively, or defending your home, SIG SAUER' offers a pistal for every shooter.



FULL-SIZE





CARRY A balance of shootability with poncealment. A full-size grip allows the shooter more control while reduced side length offers



COMPACT



#### MICRO-COMPACT

#### TRIGGER TIME

Any expert will tell you, it's the trigger that ultimately puts rounds on target. Weigh the pros and cons of each trigger carefully to select the one you can fire accurately, and carry with confidence.

#### STRIKER-FIRED TRIGGER

#### STR Short Tactile Reset

Every trigger pull has the same weight and feel with a quick tactile result to ansure faster and more consistent shots.

#### HAMMER-FIRED TRIGGER

#### DA/SA Double-Action/Single-Action

The first trigger bull performs the double-action of cocking the hammer and their releasing the sain. Followed by lighter, single-action trigger pulls on all subsequent hosts. The flearing-first trigger pull acts to reduce inadvertient discharges.

#### SAO Single-Action-Only

### THE CALIBER DEBATE

Popular opinions vary widely, but only you can select the right caliber for you. Consider bullet weight and velocity, your desired magazine capacity, ammunition cost, and availability.



#### .45AUTO



#### 10MM



.4058W
Designed to match the performance of the FBI's reduced-velocity forms. In a limiter cartridge size, while offering an energy

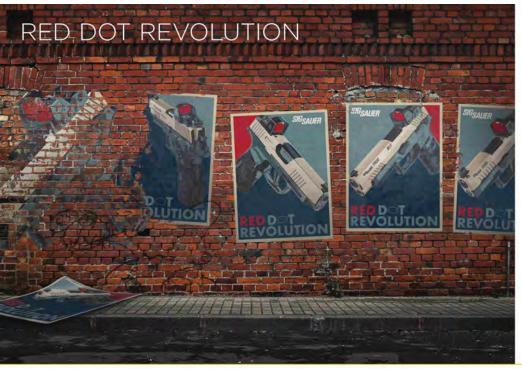






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As the only manufacturer in the industry that can truly integrate a firearm and an optic into a single system that's ready to shoot, right out of the box, SIG SAUER' is leading a Red Dot Revolution that transforms the way you shoot. SIG SAUER now offers virtually all of our most popular pistols with the option of a factory-installed, and zeroed, reflex optic. Greater performance, increased accuracy, and radically simple – welcome to the Red Dot Revolution.

#### WHY PISTOL MOUNTED OPTICS?

Designed for fast, responsive target acquisition and accuracy, open reflex red dot sights, or pistol-mounted optics, are quickly becoming popular among experienced and novice shooters. Red dot sights allow you to quickly and easily acquire your sight picture and make follow-up shots faster. The inherent simplicity of a single aiming point on the same visual plane as the target, makes red dots extremely easy to use, simply put the dot on the target, and press the trigger.





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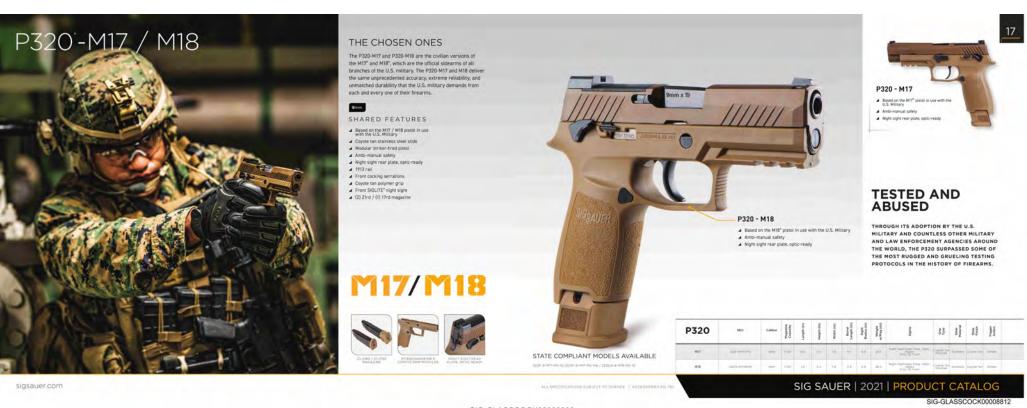
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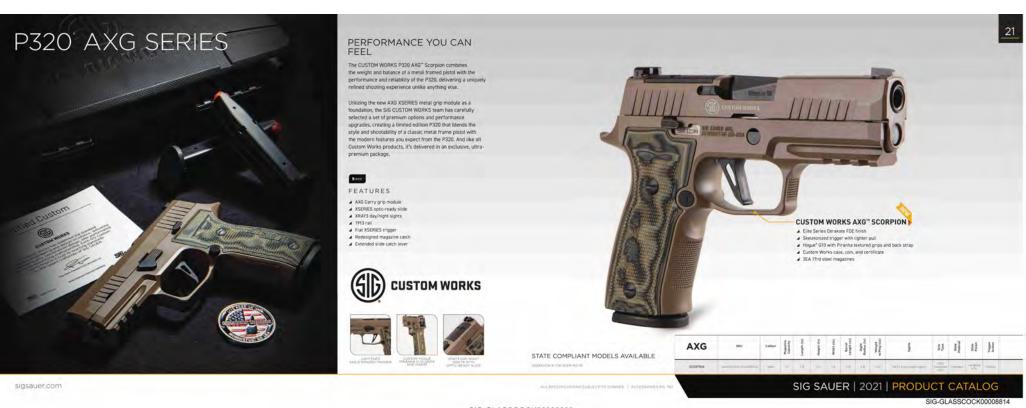
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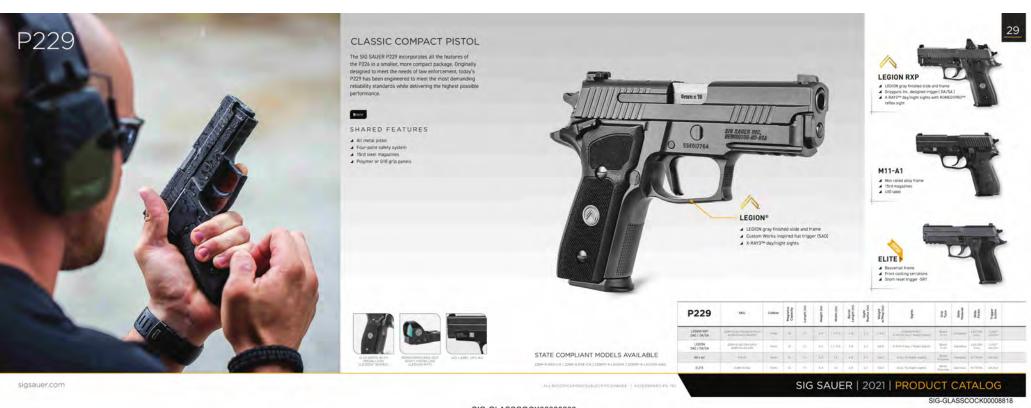


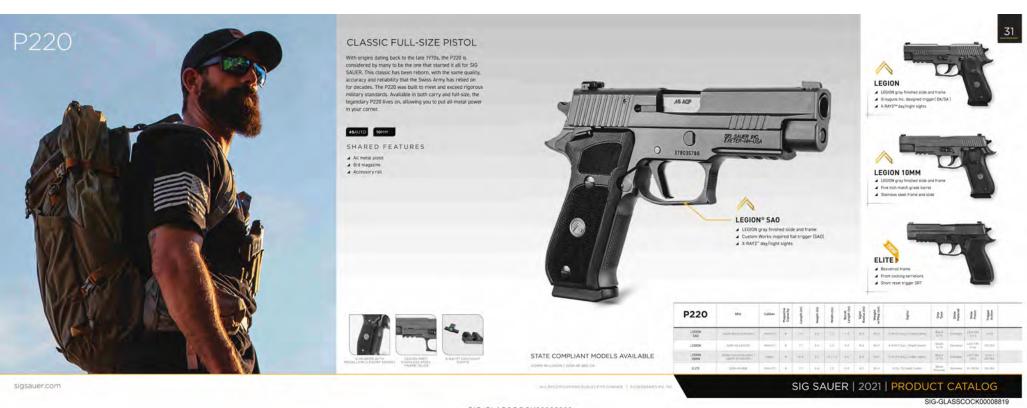


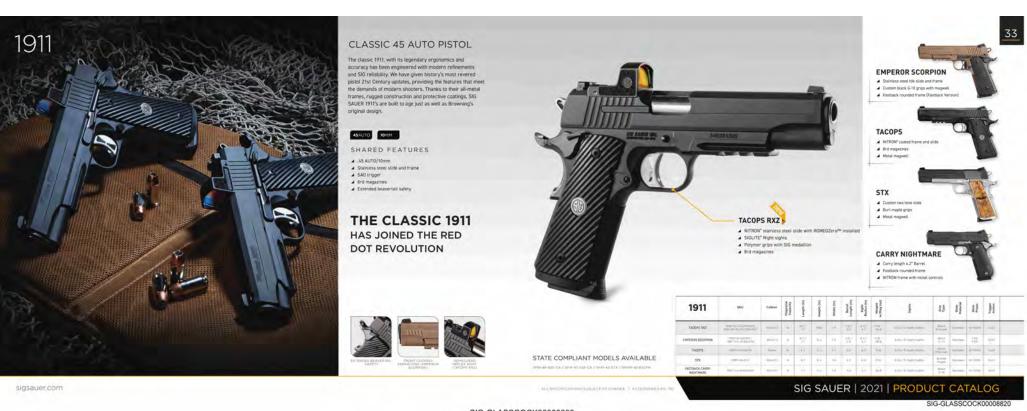


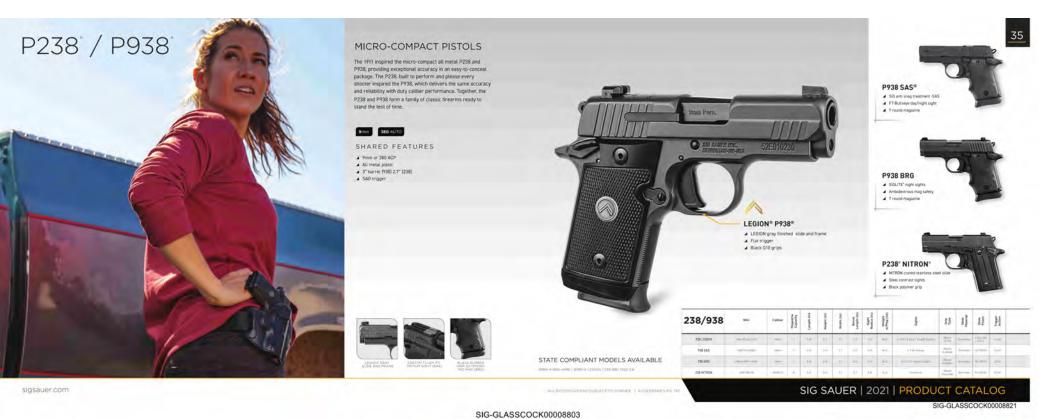


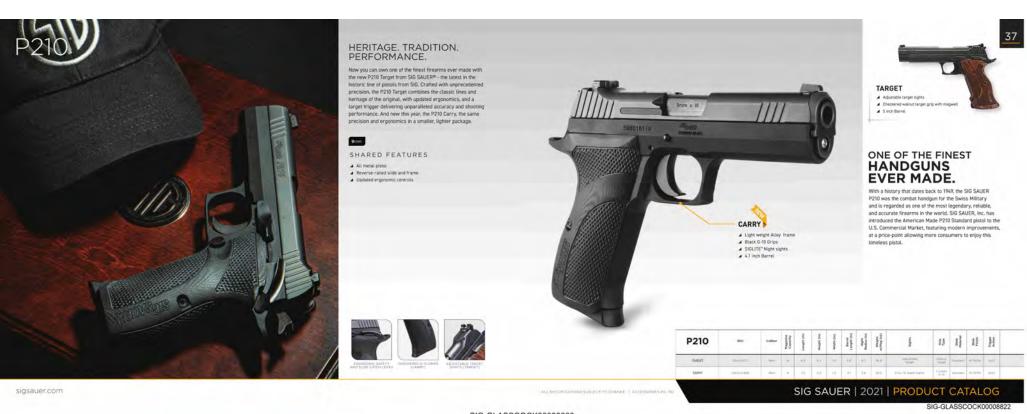














# UNLEASH THE WARRIOR SPIRIT

For thousands of years, one symbol has been a rellying cry for the world's most revered warriers. And for decades, one brand of firearms has served more elite lighting forces than any other.

Welcome to the LEGION' by SIG SAUER', Painstakingly engineered and enhanced for the discerning few with the same warrior spirit that inspired it. We have always given professionals what they need. Now, we are giving them what they want.

The SiG P220", P226", P229", P320", P938", five of the most highly regarded firearms in the professional community are receiving the LEGONS errise inhancements based on the needs and wants of eithe users. For those who demand the Dest, we now have something even better — welcome to the LEGION.

### JOIN THE LEGION.

Become part of the SIG SAUER\* LEGION for members-only access to unique opportunities and gear. To join the LEGION, purchase and register your LEGION Series\* firearm, and unlock a full range of exclusive benefits.

FREE Gear LEGION membership entitles you to a complimentary 5.11° premium zippered pistol case for your LEGION firearm, plus a challenge coin matched to your gun.

Exclusive Access When you call to receive your free case and coin, you will be automatically registered as a LEGION member, providing you exclusive access to gear and merchandise.

Exclusive Communications Be the first to know about new additions to the LEGION Series of firearms. You'll also receive other exclusive communications from SIG SAUER and the LEGION.



- 1 LEGION Gray Finish
- 2 | Solid Steel Guide Rod
- 3 | Checkering Under Trigger Guard
- 4 XFIVE Undercut
- 5 Grayguns Inc. Designed Trigger
- 6 Reduced Profile Controls
- 7 | Three Magazines
- 8 Elite Beavertail Reduction
- Betryces printing when concealed
- 9 Enhanced Polished Action with SRT Smoother DA fragam press that
- 10 Front Cocking Serrations
- 11 Custom G10 Grips
  Provides anhanced control
- 12 Tungsten Grip Module Tungsten Infused Medius, with the
- 13 X-RAY3" Sights Gotimbes tight legarithmin
- 14 Dawson Precision\*
- 15 Enhanced Front Strap Checkering
- 16 Extended Magwell Provides a larger flared opening for I
- 7 ROMEO1 Reflex Sight

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ALL BYCCHICATIONS SUBJECTIVE HIRAMIN TO A HIRAMIN CAU

LEGION SERIES











- Anti-reflective colling
- ▲ Ramdolph USA's signature neutral gray pirt lenses ▲ Frames are guaranteed for life.

# LEGION FLEECE JACKET

■ SIG SAUER Rrearm match: LEGION ▲ LEGION medicion

HOGUE" LEGION X1-MICROFLIP KNIFE

A Right or left handed, tip up dens parry with filter plans



### SIG SAUER LEGION RANGE BAG

- EVA top lid w/internal organization and ext for name tags.
- ▲ Target straps or compression straps
- External web MÖLLE & near slip pocket-Remo strap and top / side carry handles
- 16800 Polyester (lid) & 5000 Nylon Imain body?



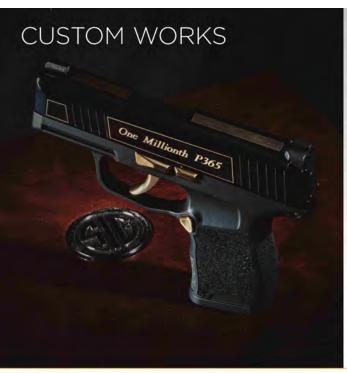
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### CELEBRATING ONE MILLION

The SiG SAUER\* P320\* and P365\* have become two of the most popular and most influential guns in America, and to recognize their historic production milestones. SiG SAUER Custom Works developed a unique, one-of-a-kind commemorative to celebrate the passing of the historic 1 million mark.

In 2020, just over 18 months after its launch the one millionth P365 rolled off the assembly line. To commemorate this rapid ascension into the SIG SAUER history books, SIG SAUER Custom Works crafted the special edition one

### P365 FEATURES

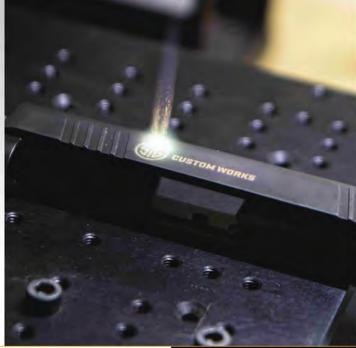
- ▲ High polished Nitron slide with 24K gold trigger and controls
- ▲ Engraving: One Millionth P365 and borders with 24K gold inlay
- The 1,000,000th P365 is a 9mm pistol with standard P365 features including X-RAY3 day/night sights

In 2019, the SIG SAUER P320 reached this historic milestone when serial number 58H1000000 was born. To celebrate SIG SAUER Custom Works created a special edition P320

### P320 FEATURES

- ▲ An all-metal frame with a high-gloss polished finished
- ▲ Engraving: Scroll engraving with 14k gold inlay, and\*1,000,000th P320\*
- The 1,000,000th P320 is a 9mm pistol with standard P320 features including XRAY-3 day/night sights and an optic cut slide





### SIG CUSTOM WORKS ENGRAVING PROGRAM

From the very beginning, SIG SAUER" has defined the quality and reliability in firearms. Today, SIG Custom Works is creating unique firearms that redefine the standard for precision engineering and design excellence.

The SIG SAUER Custom Engraving Program provides personalized firearms to commemorate events such as deployments and retirements, as gifts, and fundraising for organizations. The mission of SIG Custom Works is to deliver a personalized design, ellite performance, and uncompromising craftsmanship craftsmanship.

### ENGRAVING CAPABILITIES

- ▲ Contrast engraving
- ▲ Premium-cut engraving
- ▲ Scroll work
   Gold inlay
- Good intay











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A Transcription Co.





### INTRODUCING THE P320° FIRE CONTROL UNIT.

With it's unprecedented modularity and unmatched capability, the P320 platform has become one of the most exciting pistols available to firearms enthusiasts today. The soul of the P320 and the driving force behind its modularity lies in the unique, patented design of its Fire Control Unit (FCU).

Now, SIG SAUER is offering the FCU as a standalone product, enabling an entirely new level of customization and personalization, giving users the ability to create virtually millions of combinations to suit any need and any level of personal style.

TITANIUM NITRIDE COATED: Exclusive to the Custom Works P320 FCU, the added protection of titanium nitride ensures a unique look, with superior corrosion resistance.

EXCLUSIVE FCU SERIAL NUMBER: Stand out from the rest with an "FCU" designated serial number for each Custom Works P320 Fire Control Unit.

LIGHTENED SKELETONIZED TRIGGER: Each Custom Works P320 FCU comes standard with a TiN-coated XSeries skeletonized trigger for a lighter, cleaner trigger pull.





CREATE YOUR CUSTOM P320" TODAY

- O1 Purchase a P320 Custom Works FCU from your local SIG SAUER retailer
- O2 Register your P320 Custom Works FCU at sigsauer.com and Receive your 10% off one time discount code
- O3 Create your P320 using the Custom Works P320 Studio at sigsauer.com
- 04 Save 10% on all qualifying P320 Accessories at check-out using your





WWW.SIGSAUER.COM/P320FCU

Visit sigsauer.com to see these and the many other P320 accessories available from our preferred partners.

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# COUNTLESS OPTIONS, ENDLESS POSSIBILITIES.

The SIG SAUER\* P320° collective brings together a community of manufacturers and customizers focused on, pushing the boundaries of creativity and innovation with the P320 platform. With the lumph of the Datohn Works P320 FCU, SIG SAUER has enabled and encouraged a broat community of creations to develop an even-increasing number of parts, accessories, and uniquely customized P320 based finearms, Together, the P320. Collective represents the best the industry has to offer in aftermarker P320 performance parts and customized accessories. A vast selection of stides, barries, grip modules, magazines, and accessories are available to ensure every finished Custom Works P320 FCU product is unique. As the list of available airemarket products grow, the build options and possibilities increase exponentially.

The Custom Works FCU program is unprecedented in the firearms industry. The days of cookie-cutter pixel ownership are over. No fonger well gun buyers be limited by the vision of a single company or designer. Now, they will be able to explore the encless possibilities of the Custom Works P230 FCU and be limited only by their imagnically.





Visit sigsauer.com to see these and the many other P320 accessories available from our preferred partners.

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ALL SPECIFICATIONS SUBJECTIVE HIRAMITE. I AMERICANS

WHAT YOU BUILD IS UP TO YOU!

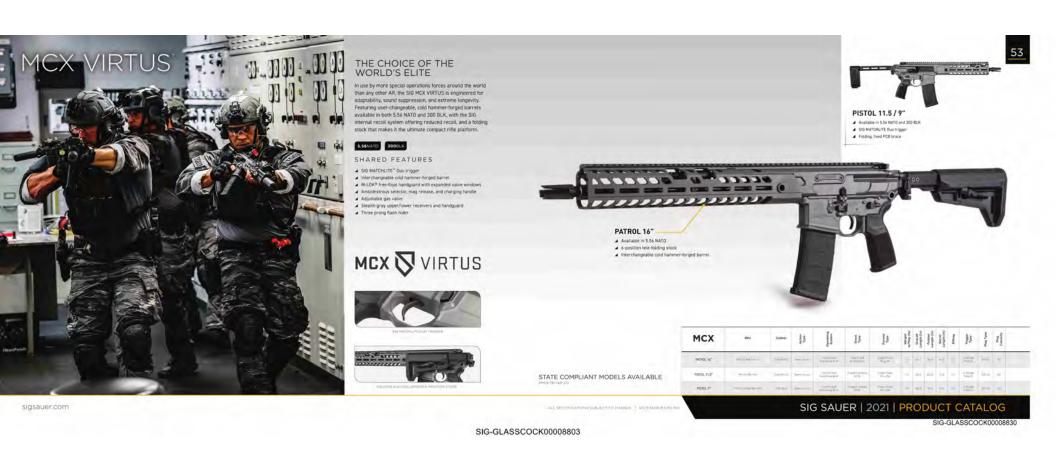
4 XCARRY STIPPLED GRIP
Stateless operand DROCUT stoke, co.
5 XCOMPACT GRIP

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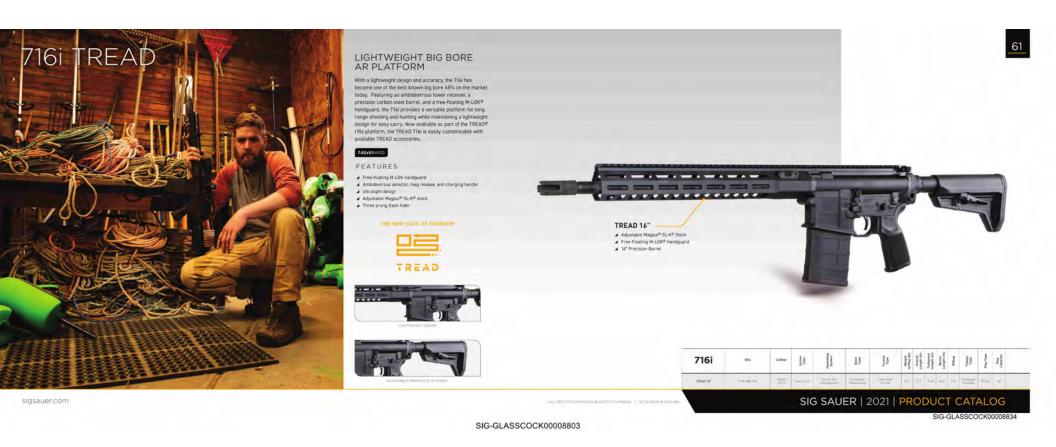
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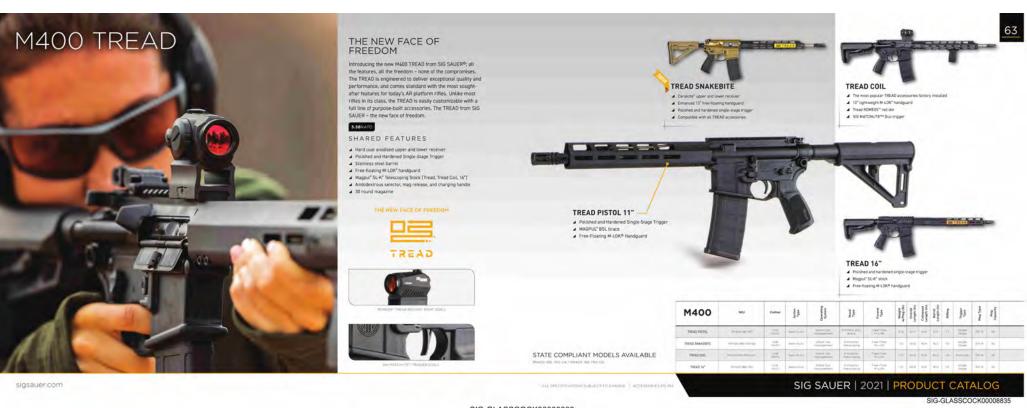










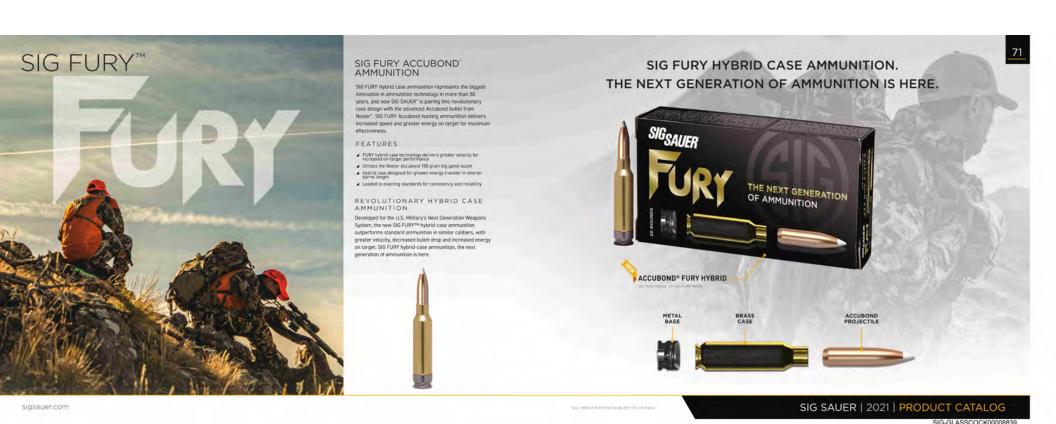








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# COMPONENTS



### BAGGED BRASS / PRIMED BAGGED BRASS

Elite Performance Ammunition shell cases are engineered to exiscting toterances and available for multiple pistol and rifle calibers. The geometric consistency of these premium brass cases ensures each primer is held tightly in its pocket. Flash holes are precise with no burns and the superior metallurgical properties of the SIG SAUER® cases enable repeated reloading. All Elite Performance rifle shell cases are induction annealed for consistent bullet retention.

THE BEST RELOADING BRASS MANUFACTURED IN THE U.S.A.

- Engineered for precision hand loaders
   Exceptional concentricity of the mouth for improved accuracy.
- Engineered to exacting standards, each brass case underges ingonous in-line and post-production quality assurance testing to resure a fawless casing.
   Flash holes are precise with no burns.
- Superior metallurgical properties of the SIG SAUER® cases enable repeated reloading
- SiG Elite rifle shell cases are induction annealed for consistent bullet retention
- All shell cases are 100% impecied by advanced metrology equipment that measures every dimensional aspect of the case.



CALIBER	QTY/BAG	SKU
380 AUTO	100	BP1002
MMe	100	BP1003
357 SIG	100	BP1005
38 SPL	100	BP1007
357 MAG	100	BP1008
40 S&W	100	BP1009
10MM	100	BP1010
45 AUTO	100	BP1011
223 REM	100	BR2004
22-250 REM	50	BR2005
243 WIN	50	BR2006
6ММ СМ	50	ВРЕММСМ
6.5 CM	50	BR2011
260 REM	50	BR260REM
270 WIN	50	BR2018
7MM REM	50	BR2024
300 BLK	50	BR2029
308 WIN	50	BR2030
30-06 SPG	50	BR2031
300 WIN MAG	50	BR2033
338 NORMA	25	BR338NM

CALIBER	QTY/BAG	SKU
380 AUTO	100	BP1002P
9MM	100	BP1003P
357 SIG	100	BP1005P
38 SPL	100	BP1007P
357 MAG	100	BP1008P
40 S&W	100	BP1009P
10MM	100	BP1010P
45 AUTO	100	BP1011P



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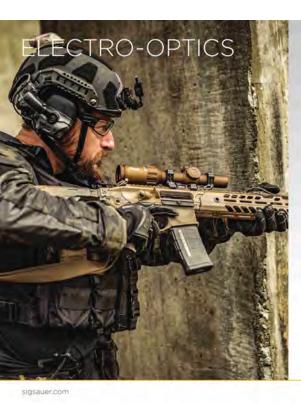
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UN-PRIMED



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ELECTRONIC AND TRITIUM LIMITED

### EMBEDDED APPLIED BALLISTICS\*

ABU" Applied Ballistics Ultralight" integrated into all BDX\* products. Ballistic solutions are provided out to a maximum of 800 yards.

ABX Applied Ballistics External

ABS" Applied Ballistics System Applied Ballistics System embeds Applied Ballistics Elde pn-board select products with integral environmental sensors to calculate complete ballistic solutions out to the effective range of any firearm.



D.A.R.C. (Dark Assgrive Reticles & Coarings) Specialized lens coarings and reticle brightness settings that are optimized for use with GEN 3+ night vision decises.



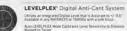


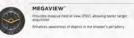
SBT' SIG Ballistic Turret A cyport, Later-eithed devalor dialog most SIG SALAR TANDOF and MHSKETYF ribescapes Marchael to the positions of the shooter's system at no extra cost from build specification, buildic coefficient, mustle effects, elevation, and other environmental factors.

LOCKDOWN' Zero System Zero stop-locking survet allows a rapid resum to zero.



HELLFIRE Reticle Electronically Illuminated utilizing an advanced fiber lights technology Varies the light intensity of the central aiming point from night vision compatible to MSLLFIRE bright for daylight flamination Results in a bright, defined aiming point for precision shot placement in any condition





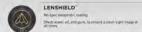
ALT Aspheric Lens Technology Eliminates aberration, reduces weight, and helps to focus the projected limige through the lenses

SPECTRACOAT Highly efficient, ultra-wide broadband, anti-reflection lens-coatings Reduces surface reflections to extremely low levels across the entire visible spectrum. Provides superior light transmission

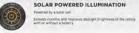


HDX' High Definition Transmittance Comprises both high definition (HD) and high scanceristance (HT) plans.

LENSARMOR"



MOTAC" Moton Activated Illumination

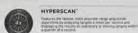




OIS Optical Image Stabilization Proprietary SIG opnical image stabilizer system

> AMR Angle-Modified Range Ranging technology using an on-board inclinometer Reads incline / decline angle and modifies the effective halfland showing range to the target Equivalent har zontal range, that integrates perfectly when used with SIG ballistic turnet dials.

LIGHTWAVE DSP" Digital Signal





90° POWERCAM" MOUNT Quick Flip away mount for fast transitions from rear to far distance forgets His button accurren for rapid single-franded operation point for precision shot placement in any condition

KINETHIC\* Kinetic Energy Indicator

Allows a hunter to set a timeshood in either fit ibs or fps for the ethical harvest of game arimals. BOX will compute distance ranged and indicate when you drop below the uper-set threshold for energy or speed of builts on strops.

BDX 2.0 Software update that includes a new easy mode for paick BCR setup out of the box, including. BGX kits come paired and bonded BDX QuickBond\*4 system gives users the ability to bond two BDX enabled devices without the smartphone app.

BOX equipped KILOP rangefinders preloaded with ballistic groups for centerfine rifles, muzzleloaders, and crossbaws. WEAPONSGRADE Polymer

Doninized for use with polymer pistols Lightweight sextured polymer

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### WHAT IS BDX?

SIG SAUER\* has built on the success of BDX, adding features and benefits that allow husters and shooters to 'hit the ground running with thur BDX systems. All BDX rangefrieders now come proregrammed with 9 Biblistic profiles that cover most centerfire refite cartridges, as well as crossbows and muzzleloaders. BDX combo kits will now come pre-bonded from the factory. All users have to do to use their systems sone is mount and zero their riflescopes. If users want to writch this complete feature set of BDX, they are still able to do this via the smartphone app

### BDX kits come pre-bonded right out of the box

When purchasing a rangefinder and riflescope together there is no setup necessary. Simply mount and zero your riflescope and you are ready to go

QuickBond <sup>™</sup> for app-less bonding of BDX equipped rangefinders and sights There is no need for the smartphone app to connect your BDX devices. Simply press and hold two buttons and your BDX rangefinder will bond with the nearest BDX enabled sight.

### Pre-loaded ballistic groups now available on KILO\* BDX rangefinders to quickly get you on target

Every BDX rangefinder now comes preloaded with 9 distinct ballistic groups. These groups represent the ballistics for each popular centerfire caliber availabil. as well as crossbows and muzzleloaders. Simply pick the group that matches your

# Download the BDX app to unlock the full advanced capabilities and features of

Setup a custom profile utilizing the Applied Ballistics\* bullet library and the exact muzzle velocity of your firearm. BDX will do the rest.

### BDX RIFLESCOPE

The powerful SIERRA3BDX and SIERRA6BDX riflescopes revolutionize the art of holdover calculation. Again, set your ballistic profile in the SIG BDX app, sync the app with your riflescope and then configure multiple holdover points in the digital ballistic reticle. When you view your target through the reticle each of your exact holdover points is illuminated. No more turrets to adjust or calculations to make.

When used together, KILO BDX rangefinders and SIERRA3BDX riffescopes combine to create the most advanced optics system available on the market today. Simply configure your ballistics profile in the BDX app, pair your KILO BDX rangefinder with the app, and then bond it to your SIERRASBDX riflescope. When you range your target the KILO BDX rangefinder automatically sends your specific holdover data to your SIERRASBDX riflescope giving you an illuminated holdover dot. It's simple and fast.

### CONNECT THE DOT".

Learn more about the BDX System at sigsauer.com/electro-optics

# THE WORLD'S MOST ADVANCED ...

- BDC reticle is customized to shooter's ballishes and environmental profile prior to hunting
- BDC reticle can be set with up to eight holdover dots at any distances out to 800 yards
- Digital Focal Plane" neticle scales with zoom like a first focal plane riflescope
- → HD Glass and Spectracoat<sup>®</sup> lens coatings.



- Erribedded Applied Batlistics\* Ultraute engine with extensive bullet library with support for G1/G7 drag curves.

   Save up to 25 custom ballistic profiles in the S10 BDX app.

- Windage and elevation holds in MDA or MILS with every target ranged. ▲ Lightwave DSP" leverages 4x/second HyperScan" and RangeLock technologies for the fastest ranging performance.



## **OPTICS SYSTEM**

simplicity and accuracy of BDX\*, KULO\* BDX rangefinders use your ballistics and Bluescoth® to illuminate the exact holdover dot in SIERRADBOX riflescopes. For the most accurate and ethical shot, luit



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SIERRA6BDX 3-18X44

▲ Digital focal plane BOX-R2 reticle Seamlessly pairs with BDX enabled devices to provide exact holdovers based on measured target distances

SIERRA6BDX 2-12X40 30MM MAINTUBE

▲ Digital focal plane BDX-R2 reticle Seamlessity pairs with BDX enabled devices to provide exact holdovers based on measured target distances
 User-customizable ballistic data provides hold-over dots.

■ User-customizable ballistic data provides hold-over dots. ▲ Side focus allows users to remove parallax











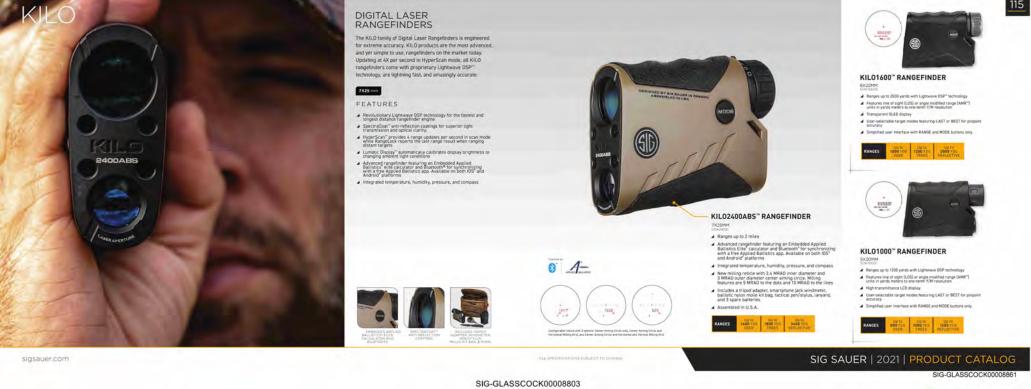


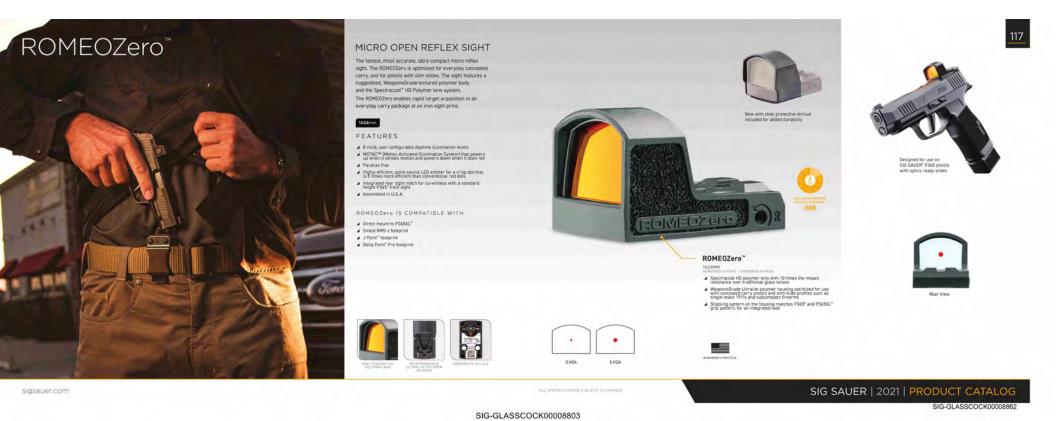










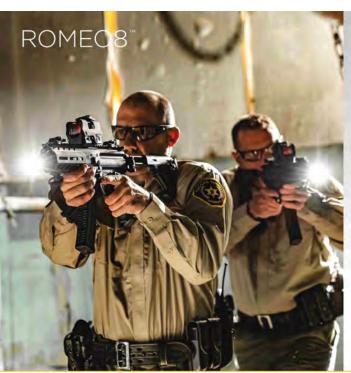














## ROMEO8H™ RED DOT SIGHT

IX38MM SORBIOOT (BUACK)

▲ Aircraft grade 6061-T6 aluminum

▲ Dependable IPX7 waterproof: submersible to 1m for 30 minutes

## RETICLES

- ▲ Flip caps and anti-reflective device included
- Removable titanium shroud for ultimate optic protection from hard use ■ Dependable IPX-8 waterproof: submersible to 20m for 30 mlnutes

ROMEO8T™ MIL-SPEC RED DOT SIGHT ▲ Lightweight 7075 aluminum main housing and components



2 MOA Red Dot Ballistic Circle Dot

sigsauer.com

■ CR123A battery provides 100,000 hours at high-brightness setting ■ 1/2" hex bolt at 85 in/lb provides retention of zero during extreme conditions

▲ Assembled in the U.S.A.

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ROME04H™ COMPACT RED DOT SIGHT

LADOMM

JOHNSON JOHNSON JOHNSON

Comes standard with Iers caps and quick-release mount.

4 50,000+ hour buttery life and the readily available CR2032 battery is side-loading to quick buttery relocations.

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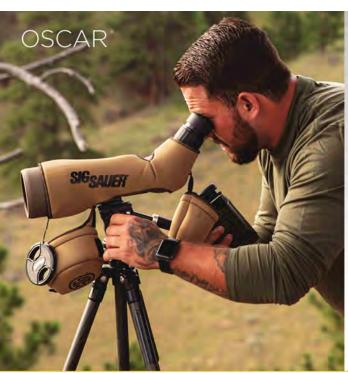












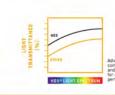
# SPOTTING SCOPES

The OSCAR family of spotting scopes delivers unmatched image clarity and performance when it matters most. The OSCAR3 mini-spotting scope puts a powerful optic in the palm of your hand, and features the advanced Optical Image Stabilization (OIS) technology, for improved image quality at the highest magnification, to make spotting your target faster and easier. Ideal for backpacking, hunting, wildlife and sports observation, along with law enforcement and military reconnaissance. The new OSCAR8 angled eyepiece spotting scope is the newest addition to the OSCAR family of spotting scopes from SIG SAUER". Featuring the industry-leading HDX" optical design, extra-low dispersion glass with high light transmittance glass, and full multi-coated lenses to deliver unmatched resolution, image contrast, and color clarity. When spotting in the field for long periods, the ergonomic design and durable rubber armor of the OSCAR8 delivers unmatched results in all conditions.











Adjustable eyecups allow the user to optimize eye relief for use with or without glasses

OSCAR8" 27-55X80MM 50082001

■ Custom SIG SAUER\* fitted neoprene cover included ▲ Assembled in U.S.A.



- OIS Optical image stabilization removes human motion and jitter to improved image quality and target identification under high magnifi
- Ideal for backpacking, hunting, wildlife and sports observation, law enforcement, and military reconnaissance
- ▲ The small size and capability of the OSCAR3 is ideal for backpacking stalk and tree stand archery, or long range rifle hunting in open cour or mountains as well as concealed viewing situations for LE or milits

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# WELCOME TO THE FUTURE OF SILENCE.

SIG SAUER engineers have developed the next generation of plasts suppressors. With decades of product design and R&D experience under our belts, suppressors are not treated as beton ancessories A SIG SAUER, it is understood that suppressors interact with your firearm's system and can affect accuracy, reliability, buck-pressure, and other critical factors. We design our suppressors to be part of a completely integrated system to maximize overall performance, and as a result we build the most advanced, most dependable suppressors the world has ever seen, or heard.

The pistol suppressor line from SIG SAUER features completely modular and configurable titanium baffles for the ultimate in lightweight performance that allows the user to personalize their suppressor for overall tength, weight, and sound. The MODX-9" and MODX-45" provide class-leading sound performance and can be easily disassembled and reconfigured with lewer baffles when your priority is size over sound. The MODX" suppressors feature 21 points of impact adjustment and come with a fixed-barrel spacer for carbine use. Each MODX suppressor includes the most popular inch and metric piston for its gliven callibration.

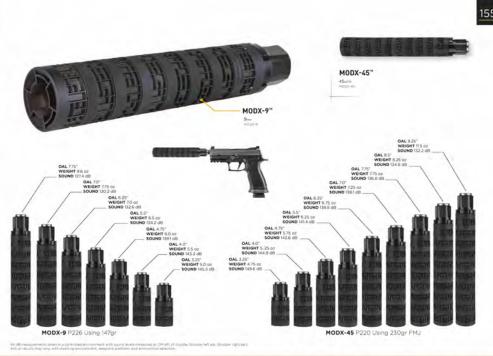
## 9mm 45AUTO

## SHARED FEATURES

- ▲ Segmented titanium 30-printed
- ▲ Titanium baffles
- Shooter can adjust the number of baffles to shape the overall length when size is more important than sound performance
- ▲ Includes two pistons [1/2"x28tpi& M13.5x1LH) and fixed-barrel spacer [MODX-9]
- ▲ .578X28 and M16X1LH (MODX-45)
- Multi-Caliber capable with accessory pistons (MODX-45)







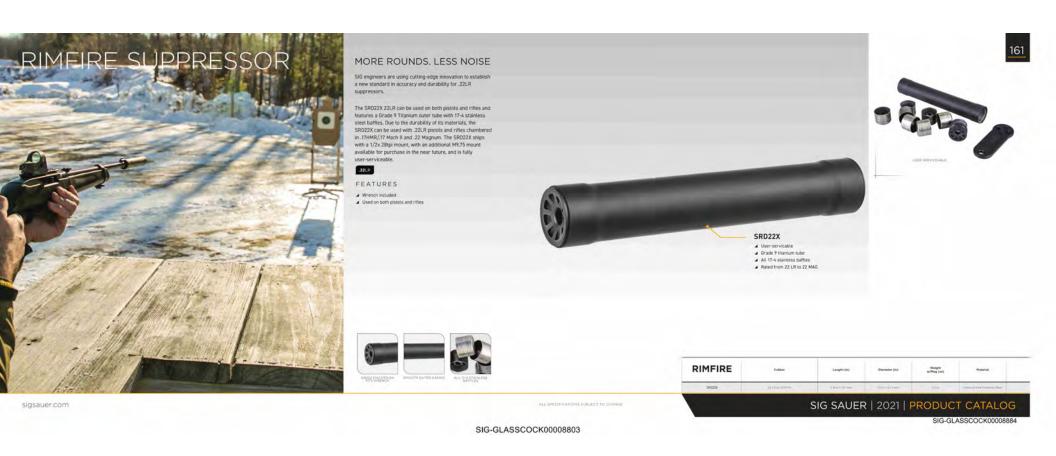
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# SIG AIR BY SIG SAUER

From the most elite name in firearms comes the most innovative line of airguns and airsoft guns which combines the unmatched reliability, performance, and exacting standards of SIG SAUER.

The SIG AIR product line includes a series of traditional CP pellet and BB rifles and platots designed to imitate the look, weight, balance, and handling characteristics of their traditional firearms counterparts. SIG AIR has also developed a precision line of break barre, pre-charged pneumatic (PCP), and single-stroke pneumatic rifles and pistots, all meeting the high standards of SIG SAUER firearms.

SIG AIR has expanded to training products with the PROFORCE\* line of airsoft pistols, rifles, and accessories. Designed and developed from the ground up to deliver a realistic training experience, that allows the user access to achieve a new lived of unrealized performance potential. The SIG AIR PROFORCE series of pistols and rifles allows for flexibility in your training environment and is an economical atternative to raining with firearchism.

Consistency was the focus when developing the SIG AIR PROFORCE line. Each PROFORCE model closely matches its real steel complement in model specifications and delivers an authentic user experience. The PROFORCE line is also engineered to SIG quality standards using authentic materials and, where necessary, patented performance innovations.

Perfected for muscle memory exercises, shooting drills, and tactical training, these airsoft and airgun models are the economic and authentic answer to training more often, more effectively, and more affordably.

The full line of SIG AIR products delivers a completely authentic SIG handling experience, with the firepower you can rely on, for all of your hunting, sporting, and practical training needs.

Shoots like a SIG, because it is one.

# SIG AIR DESIGNED TO MATCH THE ORIGINALS

- 1 All Metal or Polymer Construction
- 2 Front and Rear Flip-up Sights
- 3 | Red Dot or Scopes
- 4 | Realistic Controls
- 5 Removable or Adjustable Stock
- On same models
- 6 | Picatinny Rail
- 7 | Safety Orange Tip
- 8 Realistic Trigger
- 9 Reload Mags Just Like Originals
- 10 | Full Blowback Slid
- 11 Weight Similar to Original Great as a training tool

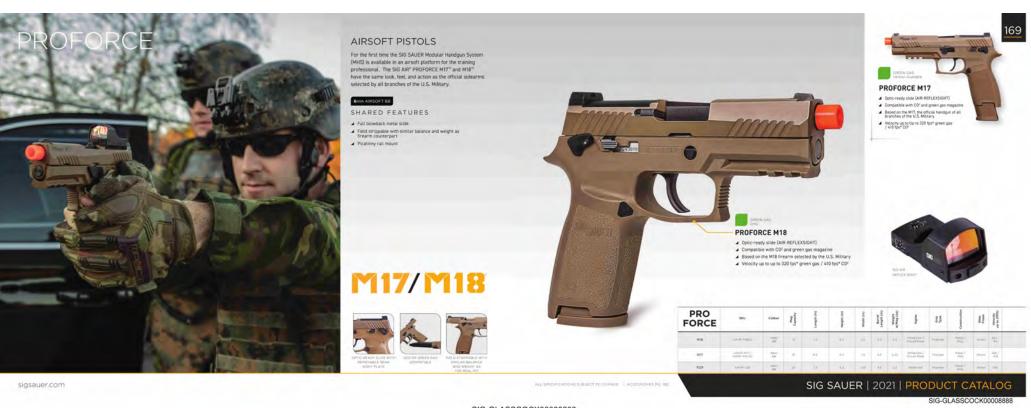
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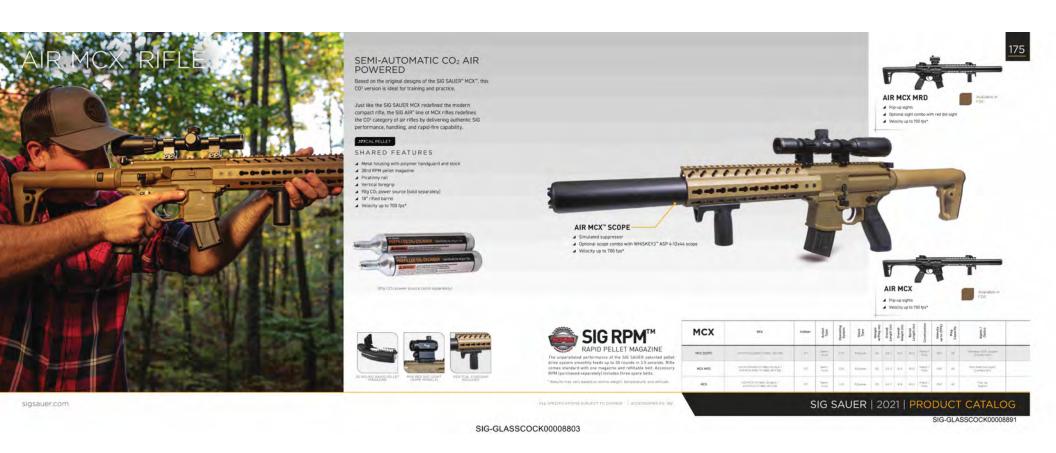
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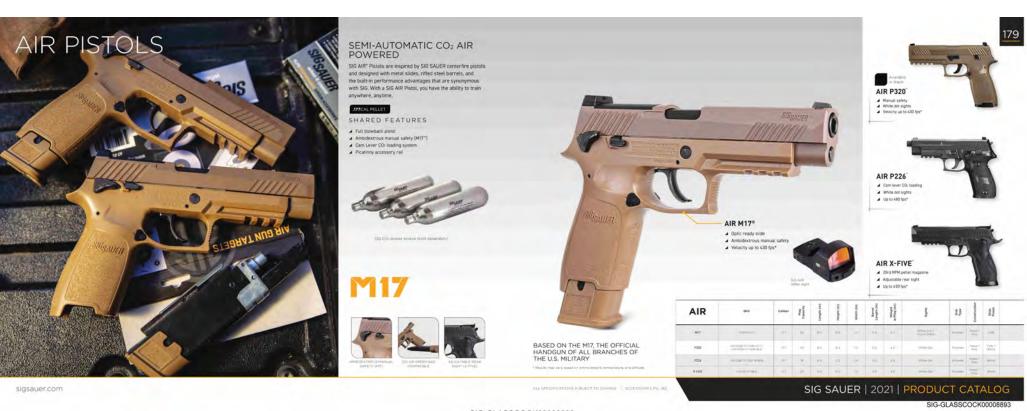


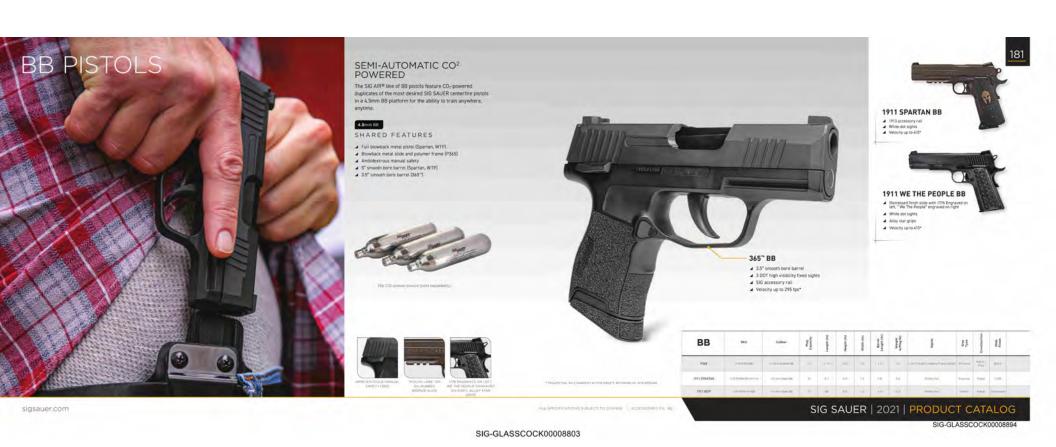














# SIG AIR ACCESSORIES

#### ENGINEERED TO A NEW STANDARD OF PERFORMANCE

#### REFLEX SIGHT

Designed for fast, responsive target acquisition with the M17" / M18" PROFORCE® and M17 pellet pistol with a 23mm. field of view. Mounting plates included to quickly and easily upgrade your SIG AIR pistol.



## HAND PUMP

The SIG AIR High-Pressure Hand Pump provides an affordable, reliable, and inexpensive method for filling your PCP airguns. For use with the 13 cu. in: tank on the SIG VIRTUS PCP rifle, but made to work with any brand of PCP gun with a male Foster quick-disconnect fitting. The 3-stage pump goes up to 4500 psi and includes an integral air pressure gauge.







PELLETS



PRECISION MEETS PERFORMANCE

SIG AIR® lead peliets after a variety of shapes for all uses and differing levels of shooters. Options for shooting paper targets, or

and performance required for every shooter.

metal field targets and silhouettes, SiG AIR petiets will fit the needs

## AIR CYLINDERS

PREMIUM AIRGUN PERFORMANCE Available high quality, CO<sub>1</sub> cylinders and PCP air tank provide solid platforms for consistency and reliability. The use of SIG premium air cylinders for your SIG AIR products will ensure long lasting SIG





MAGAZINES

ELEVATE YOUR FIREPOWER

Utilizing a variety of different style magazines with innovative features, such as cam lever loading and the patented Rapid Pellet

Magazine (RPM), SIG AIR magazines are engineered to elevate

SIG RPM™

performance and firepower in all of your SIG AIR products.



## SHOOTING TARGETS

sigsauer.com

Whether you are training in your garage, basement, or back yard, there is a SIG AIR Target to suit your training needs.

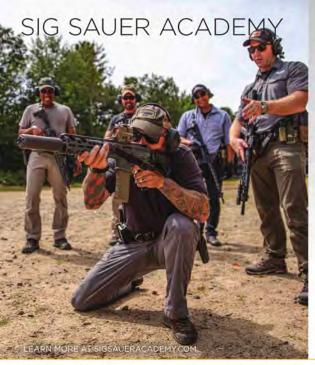




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#### TRAIN WITH THE PROFESSIONALS



## WE'LL MAKE YOU A BETTER SHOOTER.

With a team of world class instructors, from a broad range of backgrounds, the SIG SAUER Academy provides the finest firearms and tactics training available today. Using our objective and performance-based training methods, we can help develop and expand the abilities of virtually any level

Our expert staff of instructors has the unique ability and experience allowing them to train all types of firearms users, from civilians to law enforcement agencies, including elite military.

The SIG SAUER Academy is committed to delivering the best, most realistic. fundamentally sound training experience possible. We'll make you a better

FOR COURSE DESCRIPTIONS, SCHEDULES, AND MORE, VISIT SIGSAUERACADEMY.COM

#### FACILITIES

outdoor training facilities. We have developed a variety of ranges and infrastructure allowing us to create almost any type of environment and to prepare for practically any situation. Facilities include

- 1,000 Yard Rifle Range
- · 26 Different Live Fire Ranges · 270 Degree Range
- · 2 Live Fire Shoot houses
- · Tactical Training with Breaching Capabiliti
- · Obstacle Course. Indoor Pistol and Rifle Ranges Vehicle Defense Range

Additionally, the SIG SAUER Academy is home to the factory-direct SIG SAUER Pro Shop, displaying the entire line of SIG SAUER pistols, rifles, electro-optics, suppressors, ammunition, airguns, accessories, and apparel.

#### PRIVATE AND MOBILE TRAINING

The SIG SAUER Academy is dedicated to providing the highest level of training available, tailored to fit any individual or organized group. We provide customized, private classes at our Academy, or we can take our expert training to a private location upon request.

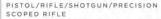
Private classes for corporate and executive clients, government agencies and private groups, as well as for individuals, are available either as a standard course listed on our website or as a custom class designed to your specific needs. Private instruction ranges from foundational shooting tutorials to advanced dynamic tactics in a one-on-one or group learning

#### INTERNATIONAL CUSTOMERS

The SIG SAUER Academy has a diverse staff of expert, bilingual instructors who provide the highest level of training and instruction to international civilian and military/law enforcement customers.

SIG SAUER Academy staff has consistently trained with some of the world's. most elite counterterrorism units, providing expert instruction across a wide range of training needs. Our staff and facilities can provide any level of instruction needed to international clients, and can provide all of the necessary equipment and materials, including all tactical equipment and firearms, no matter what manufacturer or platform is required.

# ABOUT OUR COURSES



The SIG SAUER Academy has programs that are designed to achieve results across a broad range of platforms, from pistols and rifles, to shotguns and precision long-range shooting. All courses are taught from a foundational level and have a progression structure allowing students to develop their skills at their own pace. Depending on your personal training objectives, we offer classes for personal and home defense, individual skill building, and instructor certification.



#### ADVANCED TRAINING

Advanced training courses are designed to take a student's skills to an extremely high level. These classes help provide students the knowledge, skills, and confidence to improve their performance and decision-making in a high-risk, high-stress environment. These courses include specific subjects such as low light pistol and rifle, advanced medical training, executive protection, as well as vehicle and scenario-based training.



## ARMORER

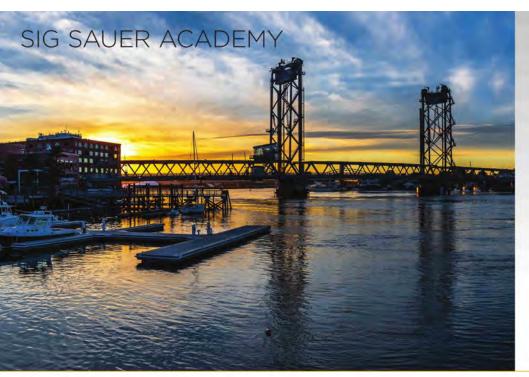
SIG SAUER is one of the many major manufacturers which offers civilian armorer's courses. Our armorer's certification gives students a complete and thorough understanding of SIG SAUER firearms, including proper maintenance techniques, and inspection processes. These courses are designed to provide all of the necessary information to preserve the firearms factory warranty. Students who successfully complete these courses receive a three-year armorer certification.



#### LAW ENFORCEMENT/MILITARY

SIG SAUER Academy is dedicated to providing the highest level of global training for military and law enforcement professionals. Courses include specific subjects such as bus and vehicle assault, night vision, breaching, and direct threat care. Any course can be conducted remotely or customized to meet agency or department needs. Custom course design and implementation allow for any desired capability and duration of training. The SIG SAUER Academy also has physical fitness facilities available to visiting groups at no

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## MORE THAN TRAINING. A DESTINATION.

SIG SAUER ACADEMY\*\* is located in the Seacoast region of New Hampshire, just an hour north of Boston, and an hour south of Portland, Maine. New Hampshire is home to 18 miles of New England coastiline and beaches, and is situated approximately an hour away from several top-rated skiresorts in the White Mountains. Nearly historic Portnamouth is a favorite tourist destination, featuring nationally-recognized restaurants and culsine, cultions sight-seeing activities, local bouldujes, tax-free shopping, and a striving nightlife. There are several major transportation hubs allowing says access diony with a wide variety of accommodistions available nearby.

#### PRO SHOP

The SIG SAUER Academy Pro Shop is a full-service, factory-direct retal store open to the public, located on the grounds of the SIG SAUER Academy. The Po Shop features the entire line of SIG SAUER pixtols, rifles, electro-optics, suppressors, ammunition, airguns, accessories, and appared and also has ammorer's services available on-site. The Pro Shop staff are highly trained and can provide expert advice on all the latest SIG SAUER encodurts.



#### ACCOMMODATIONS

Through partnership with SIG SAUER®, we offer special rate arrangements with local hotels in Exeter, Dover, and Portsmouth NH, all within 10-30 minutes of the Academy.



#### TRANSPORTATION

The SIG SAUER Academy is approximately 30 minutes east of Manchester, New Hampshire Airport (MHT), and approximately an hour north of Boston international Airport (BOS) in Massachusetts. Some SIG SAUER partner hotels also offer students free shuttle access to and from the Academy.



#### EXETER

Boasting tree-lined streets and a wealth of historical architecture, Exeter is a quick 10 minutes from the Academy and hosts three of our preferred hotels. With ample resturants, shopping and night tile, this picturesque river town is a convenient place to stay while training at the Academy and is roughly 10 miles inland from the coast.



#### PORTSMOUTH

Venture into downtown Portsmouth, where you'll find a steady mix of modern and historic flair. From cobblestone-lined streets and historic buildings, to waterfront dining and local breweries, Portsmouth is not to be missed while here.

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#### ABOUT OUR SHOOTERS



#### MAX MICHEL - TEAM CAPTAIN

Max Michel, Jr. is one of the most dominant shooters in the world today and is recognized as a top-tier athlete and instructor.

Max is a Guinness World Record hotder and International Practical Shooting Confederation World Champion. He holds a World Speed Shooting Championships, 12 USPSA National Championships, 5 US Steel National Championships, is a 4-time Carry Optics National Championships, and holds more than 200 additional major championship victories. As an international competitor Max has represented the U.S.A. in the last seven IPSC World Shoots and returned home bearing gold each time and is set to complete one again in 2020 for Team U.S.A.

For Team SIG Max focuses primarily on carry optics competition, and as Team SIG Captain he serves as a mentor for Team SIG and is a premier brand ambassador for SIG SAUER®, Max is a U.S. Army Veteran.

Pistol: PSECTATIVE
Optic: ROMEO' or PONEDOMA
Ammo: March Edu (Smert)



#### LENA MICULEK - PRO SHOOTER

Regarded as the top female 3-Gun competition in the world, Lena dominates both 3-Gun and PCC competition. Lena nettered into the competitive shooting world in 2005 with five consecutive Sportsmarks Team Challerings Sub-junior and Junior Division national titles, and at 17 years of 84 he won her first World Champion title. Since turning pro, Lesa has earned more than 75 major wins including back-to back NRA World Shoot "High Laoy" titles, a "High Laoy" title for carry optics, and 8 world titles. Additionally, in pistot calibre cartine (PCC) competition Lena is breaking barriers for female professional shooters. She is a two-time national female champion for PCC and was the first female to earn a top-five finish in PCC and was the first female to waits calibre cartined to the professional shooters.

For Team SIG Lena competes primarily in pistol caliber carbine (PCC)and 3-Gun competition.

Pistol: PAPE TIME
Rifle: SIG MPDT FCC
Optic: ROMEOS and TANGOFT
Ammo: Hitch & In Committee hit



#### DANIEL HORNER - PRO SHOOTER

Daniel Morner is a multi-discipline World Champion shooter having captured over 125 championship titles at the world, national, regional, and state level. His titles include: 2019 All Army Champion 10 USPSA Multi-dium National Championships, 4 3-Gan National Championships, 2 Linternational Stepier Competitions, 2 (IDPA National Championships, an IPSC Shortpun National Championships, and IPSC Manufacture of Market Shortpun Observation of Market Shortpun National Championships, and many more Damiel is a U.S. Army Veteran and was recruited to the Army to join the U.S. Army Markstamaship lattic (USAMM J. Market ne became nor of the most decorated shooters in team history, He served as the Coach of the USAMM Action Shooting Team, and during his service was twice selected as the Military Marksmanship Association Soldier of the Year.

For Team SIG Daniel competes primarily in 3-gun and long-range rifle competition.

Pistol: TANG XTIVE with branched Rifle: SPANDE Optic: TANGGOT'

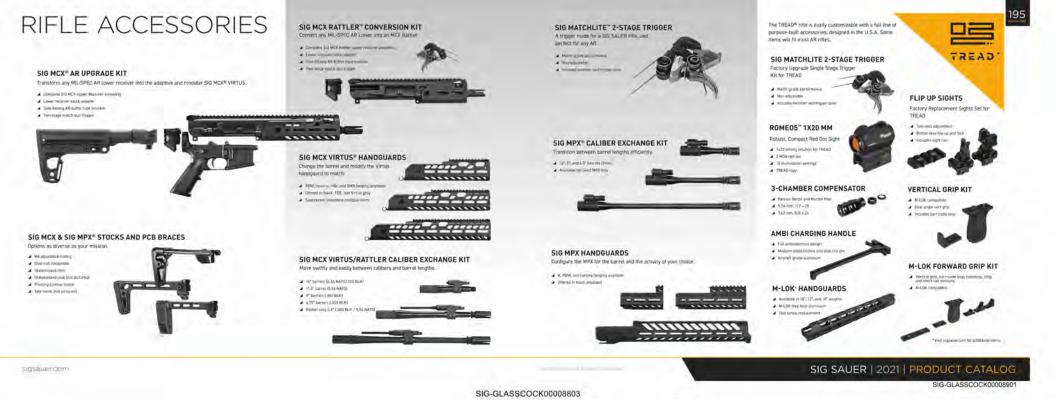
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# PISTOL / RIFLE AMMUNITION





		Califor	Builet Weight (grains)	Velocity in FPS HUGDLE   25 YOF   50 YOF   100 YOF	Energy in FTLBS MUZDLE 728 KDE 150 KDE 1500 KDE	Trajectory in Inches 25.406 LSO.406-1900 VDS-	Product SKU
		380 AUTO	90	BM(1041) 901(87)	192 980 169 110	(0/00/48	E86041-20
		9MM LUGER (165)	.115	FED 100# 973 973	200 200 20 7D	08 00 67	Tuestal-105-20
		RMM LUGER +P.	124	IIIN 1337 1096 1006	430 456 EE 209	46 DU -67	EIMMAZO 20
			315	188 106 10% 1000	250 Divino 255	00 00 10	£8ppsylv30
ш		9MM LUGER	124	TRS TOJ RET 971	374 338 504 315	DE DO 73	E0999A1-00
EFENSE			147	905 858 954 891	STY 500 285 259	U# (DO -95	FRMMAI-20
Til.	Z	357 SIG	125	13841 (271 (197 ) 1090	811 449 500 300	04100068	838751-70
IL	ROWN	58 SUPER +P	125	1730 H96 HH5 106W	(3)( 57) 333 380	06 00 67	E DUSTILI DE
DE	8	38 SPL +P	125	900 870 851 700	225 (211) 202 (83	12 0.0 00	199501.00
_	Ö	357 MAG	125	1840 U.S. 250 106	100 500 60 540	03.00 51	(5/19) 20
ш	>	DW.	165	1090 (1048 T015 954	435 4/15 3/6 334	07/00/160	5405W1-20
ELITE		40.58W	180	985 (960 (934) 900	188   167   1948   137	00 00 94	E409W2-20
ш		TOMM AUTO	180	(050   978   90 (00)	60F SW 49E 60	05 00 -61	(30mm-30)
			185	995 393 m/ - 855	AD7 373 345 (300	05 00/196	245APD 25
		45 AUTO	200	98 100 884 1853	374 (360 (347 ) 323	- VII.DIQ   90.8	E48AH 20
		23.7	230	830 (8)01791 (855	357 (335 (319 (28)	14 (001-134)	E45AP2-20
		44 SAW SPL	200	700 640 677 641	286 208 200 894	21:00 -00	(84571.00
		44 REMINAG	240	1800 NOT 171-1075	901-107-730-55	05/00/58	E4304AT-20
		AS LONG COLT	230	650 909 909 711	MO 10 114 305	(1-00-422)	EASIERO



ΙŞ	Caliber	Bullet Weight (grains)	Velocity in FPS MUZZLE125 YOS 150 YOS 1900 YOS	Energy in FTLBS W-IZZLE (25 YOS ) 8d YOS (900 YOS	Trajectory in Inches 25 YOS 156 YOS 100 YOS	Product SKU
MATC V-CROV	9MM LUGER	147	885, 900 (HUT 901)	20+12+1222129+1	-08/001-04	Description of



PISTOL

Califier	Bullet Weight (grains)	Velocity in FPS MUZZI E (26 YDS) (SDYDS) (SDYTIS	Energy in FTLBS HIGZLE; 25 YOS (30 YES) (30 YCS	Trajectory in Inches 29 YOS (50 YDS) (50 YDS)	Product SKU
360 AUTO	100	310   BDB   B30   BOD	1964 152 160 142	12:00:-05	E28081-50
9MM +P LEAD-FREE FRANGIBLE	90	(335 /24) (10 / 995	250 290 247 799	049 000 65	ESMMLET 50
9MM LUGER (365	115	1050 100 076 922	ZEZ 26 246 277	EU DD -06	E9WHB1(3/(5-5)
	ns	188 125 076 999	200 303 706 255	200 010 -7.0	Ephres1150
9MM LUGER	124	163 111 (45 99\$	374 340 31 272	06.000-01	\$3MM03-50
9MM LUGER	147	WAT THIS REW BINE	317 3(0) 286 261	80 00 04	E940403-50
357 SIG	125	1356 1246   1154   1124	506   427   367   389	05/00/60	E38781 50
38 SUPER +P	125	C30 164 (IV) 100s	470, 377, 341, 242	DE 010 -05	EXESUR-50
36 SPL	125	900 (88) 963 (80)	223 275 207 791	1211201312	C18501-50
357 MAG	125	1450 (\$30 025 972	5(4) 491 497 591	04 00 -53	E157HL-501
40 S&W	180	985   989   935   695	388 - 667   399 - 319	0.9 (0.0 1-9.4)	6405(0+50
10MM AUTO	180	1850 MS 189 1040	604 BEI SIO #34	05 00 43	EIOHBUS0
45 AUTO	230	830, 9% 903 777	332 840 889 806	141001-229	#458A3-50



				Wellocity in FPS MUZZUL (100 VDS) 200 VDS ( 800 VDS	Energy in FTLBS HLIZDLE   TOG YOS (200 YDS) 300 YOS	Trajectory in Inches MUZZLE   100 YOS   200 YOS   200 YOS	Product SKU
Щ	$\supseteq$	221 REM	55	\$240 2075 2539 2025	1787 1009 787 605	0013131379	ERREGO
_	Ξ	5.56 NATO	55	5273 (287) (2503 (2163	1308 - 1006 - 765 - 572	0.0 - (3) - 61	138011-00
Y	-	308 W/N	150	2900 3667 2447 3236	2501 2370 1993 1668	00 -19 -06	E30881-20
		300 BLK	125	2145   1890   1872   1469	1277 1001 776 1598	0.01-6.71-25.9	130093-10



≿	UBOND		Bullet Weight (grains)	Velocity in FPS MUZZLE 1700 YDS-1200 YDS-1300 YDS-1 400 YDS-1500 YDS	Energy in FTLBS MUZZLE   100 YDS   200 YDS   500 YDS   400 YDS   500 YDS	Trajectory in Inches MUZZLE I YOU YES I 300 YES I 300 YES I 400 YES I 300 YES	Product SKU
FUR	ACCUB	277 FURY	150	(840 (80) 1400 (20)) Tall 1900 (20)	Acr 1150 254 778	00 19 05 016 451	HZZZSFABISU ZD

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# RIFLE AMMUNITION











	Calter	(Stayed) Annibod (project)	Sullet Type	Gatistis Coefficient (GI)	Velocity in FFS HUZZLETICINOLIZOFYOU BOOKSLINED SIZE MENO	MACCALL CONTROL (TO YOU ARE) AND A TO SHOULD SEE A TO SHOULD S	Trigictory in Inches	Product SKU
	223 REM	77	MTD	0.563	2750 2460 2162 2108 878 615	(2)(3) (068 876 7/0 57) 456	00 -41 -(50 -545 -641	E223M1-20
	5.56 NATO	n	RTD	0.862	2750 2494 2262 (2008 HIZE HELE	775(3) 1048   873 (710) 373 (456	00(-41(-50)-341(-84)	E554M420
	300 BLK	128	orie	0.118	2500 1964 1753 1864 1379 031	041-1071-852-670-526-40	-0.0 ( m 6 ) 77 4 (56.3 (105.5	E800h+q0
	300 BLK SUBSONIC	220	OTM :	0.000	1000 Fine: 840 (919-892 (570)	466 458 432 405 559 570	-00-st51-103-29(5-886)	£500A3-20
	6 MM CREEDMOOR	107	Q/M	0.47	2050 2771 2600 L2484 (2275 206	2067 (804) (806) 407 (527) 2086	0.0[-15(-0.3)-20.6 -401	FEMMEND DO
	65 CREEDMOOR	340	0796	0.585	260 2524 2584 2209 2010 188	2049 1980 756 EDF 100 143	00 26 -02 -770 -00	1450/0-00
2	260 REM	140	OTM	-0.636-	2750 2529 2414 2255 (202 (953)	2301-2087 (81) (380) (573) (188	0.0 -32 -04 -255 -484	E260H2-20
Ē.		368		0.802	2700 2505 25W 25B 1967 1965	27m 2540 2003 1705 448 025	TIO -41 147 -328 -388	Вземнее
	308 WIN	175	MICH	D-496-	2800 2404 2256 2094 1039 1791	2626 2284 1977 1715 1460 1246	00 -29 -07 -104 -514	E308H2-20
	30-06	mi	DTM	0.496	7700   2321   2348   2382   5023   1872	2832, 2466, 2142-1650 (58) (58)	00 25 13 274 520	E3008H2-QD
	300 WIN MAG	190	0114	0.633	2850 (2674 2505) 2341 266 -2015	5400 (5017-2648-2319-2016-1748-	00 -34 -03 -275 -301	ESWHELIO

8 P	Caliber	Bullet Weight (grains)	Bullet Type	Ballietic Coefficient (ST)	Welcity in FPS	PACES INC. YOU AND YOU MANYOR	Trajectory in Inches (DO YOR) (BOYCE) (BOYCE)	Product SkU
>	223 REM	40	HeelD	0.06	1630 5009 2570 2003	DH3 847 587 ANV	00 -07 -07	F22391-70.
TIPPED	22-250 REM	40	4 (hn/Etz	0.000	W15 1/00 2044 (754)	1403 (102) 718 (403)	00 -01 -63	(328/4630
d I	243 WIN	33	1100(12	0.275	3880) 33)7 (2978 (249E	1638   6303   16547 ( 761	0.0 -0.1 (-4.2	E245VF70
	300 BLK SUBSONIC (91 BARREL)	205	THREED!	-oaas	4000 Yest not uses	NOT THE BOOK TOO	0.0 -34.9 -10.7	£300H2-20

ND	Catther	Suit West Core	phe .	Dullet Type	Ballistic Coefficient (S/1)	Wholey is FPE	Energy in FTLBS MICELLY I BOYCON (2011 ACC 1209) ACC 1209 ACC 12	Trijetory in tiches	Product SKV
Bo	5.5 CREEDMOOR	14	Q ACC	CUBOND:	D'500	,2650 (2471) 230 (2007) 3997 (1050)	285 (10) (65) (43) (23) (36)	0.0   9.7   01.91-78.6   1541	EBSCHABI4000
CCU	SOB WIN	61	ACC	CORONII	0.475	2840 2641 3462 2284 204 991	2905 2967 2220 1912 1637 1595	2.34- (46-) (37-) (37-)	ESCHARIST-DO
A	270 WIN	19	o Acc	CUHQNO	0.500	2860, 7679, 2499, 2379, 295 (700)	2724   2384   2029   1905   1960   1942	00[-19]-93[-237]-485	1270AB/50-20

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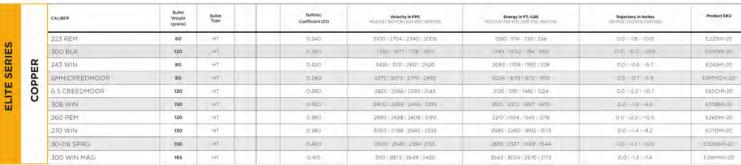
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SIG-GLASSCOCK00008803

ELITE SERIES

# RIFLE AMMUNITION







ELITE SERIES

	300 111111110	100	3.1	0.410	310 12073 12043 12432	3343   3344   2370   2770	WW. 1-10F. 1-104	- CHANNILL CO
Н	CALIBER	Bullet Weight (grains)	Bullet Type	Ballistic Coefficient (G1)	Velocity in FPS MUZAR (100 YOS, 1300 YOS, 1300 YOS, 1400 YOS, 1300 YOS,	Energy in FT-LBS  **LIZALE [100 YOL   200 YOL   200 YOL   400 YOL	Trajectory in Inches OCYDE (200 YDS 1,800 YDS 1,600 YDS 1,500 YDS	Product SKU
	243 WIN	90		0.490	3115   2916   2725   2543   2367   2199	1939   1699   1484   1292   1120   966	0.0  - 1 -6.9  -18.0  -35.4	E243TH2-20
	6 MM CREEDMOOR	100		0.515	2970 2786 2610 2441 2277 2120	1958   1724   1512   1322   1151   1998	0.0 -15 -81 -205 -397	E6MMCTH2:20
Ω	6.5 CREEDMOOR	130		0.510	2850   2670   2496   2329   2169   2015	2344   2057   1798   1566   1357   1171	0.0   -1.9   -9.4   -25.3   -44.5	E65CMTHI-20
PE	260 REM	130		0.510	2820   2641   2468   2303   2143   1990	2295 2012 1769 1530 1326 1143	0.0 -2.0 -9.7 -24.0 -45.0	E260TH1-20
TP	270 WIN	140	Lead Core Tipped	0.508	2950   2765   2587   2416   2252   2093	2705   2576   2080   1814   1576   1362	0.0   (1.6   -8.5   -21.0   -40.6	E270TH2-20
> 7	7MM REM MAG	150		0.575	3000 2834 2674 2520 2371 2227	2997 2675 2381 2115 1872 1651	0.0 -13 -75 -19-2 -371	E7RMTH2-20
	308 WIN	165		0,530	2840   2667   2500   2389   2184   2085	2955   2605   2289   2004   1747   1517	0.0   +1.9   -9.4   -23.2   +44.3	E308TH2+20
	30-06 SPRG	165		0,530	2950   2772   2601   2437   2278   2126	3(88   2015   2479   2175   1902   1655	0,0 -15 -8.2 -20.7 -40.0	E3006TH2-20
	300 WIN MAG	180		g 515	2960   2777   2601   2432   2269   2112	350  308  2703   2363   2057   1783	0.0   -1.5   -8.2   -20.7   -40.0	E3WMTH3-20

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VITAL SECTION AND AND ASSESSMENT

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SIG-GLASSCOCK0000890

SIG-GLASSCOCK00008803

310-GLA33COCK000000

#### SIERRA6" BDX

0.00	eltor)	0.000	1999	Evit	Pupil	FT o	ear Fie	rid of V				Recor		Objective	Obje	ect/ve	We	right	Devetion	Windsge	Germanian I	Lon	ooth
Model	Focal Place	Reticle	ADJ.	H	м	- NB		H =	100 H	- 19	esi esi	-	nd.	Filter Thread	_	perture	-		Adjustment Pange	Windage Adjustment Range	Settings	Light	gun
		_	129	-	1000	(ME)	LOW	- (110)	TD6	80	529	1000	116.600	(850	-	DUNCE	DESE	Freigh	narye		HEH	- 88	
1 Jan nor	Simme	DEN PO State Const Paint DOS	20 1004	ñ.a.	(5	10.5	87	= 0	77	57	19	м	(m)	emma	\m	200	p.s.	Test.	NO MILE	AD MOX	R Spirit	0.73	273
SSHAAM	Linguig	101-42 364 Feb 101-251 101-65 4 Feb 1	28,6554	0.1	j.k	100.0	1,11	107	ů.	31	3.5	qu.	98.	man to give	17	ii.	110	tero-	THE SAME.	апмі) а	8 apparent	1926	ter
10 x 64 year	-	理	pt-sol.	ů.	1.9	8.9	3.1	1.5	te	Tk)	13.9	н	or.	емин	i	M	10.4	, may	10 100	minds.	it daymen	471	975

#### SIERRA3" BDX

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				Exit	Puni			nid at V	Sigw		Eye	Relief		- maria	ON	ictive		make.	Marinia	minton.		100	
Model	Focal Place	Reticle	ADJ	H	М	FT a	100 rds	H-o	100 M		HEH .	-	EN .	Disective Filter	Clube A	perture	W	ignt	Adjustment	Windage Adjustment	Murrination Settings	Len	gtir
	7.44			LOW	Mile	UN	100	10W	WEST	Litry	per	LINE	U. 9880.	Thread	1800	***	<b>SAMES</b>	ENAM	Range	Range		MIN	190
11 (130 mm	Second	ODA-ST Tragged From The DUTT Translate	-/8 mos	11	4.0	10 H	(3.2	120	An	1.7	X,H	E0, 0	30.0	*# 11.13	0.0	-2,6	19.4	100	Al-right	10 MOA	Witnesser	78.900	15
t Google and	Section	GDA-P	ACM IS	Àn	42	210	94	Bar	26.	ú)	M	1003	41.0	9.76.9+0.9	NS	36	10.0	100	Messi	SSMON.	Appropriate Approp	y.n	10
ten (Ann	Second	DEFE DISAMPLE PANNELED BANNE SAMPDON	35 MO)	2.5	t)	19.0	6.7	0.05	20	1.7	3.4	108,9	80	00100	(7)	tz	25.9	000	11.600	24 0.00	G dayowar'	iz it	10
FE-14   Shore	Samonj	GD(CC) Display Price Disce OL/D Threats, at fact those	SEMIM	¥	6.0	0.0	6.1	0:00	-10	10	44	657	1001	NADE OF	(0	sit.	269	79	H eim	AS MAN	Didentime!	1275	10
64 10 N Salvers	Sport	Approximate Community Oc. ED Barrier Co.	J5140a	6x	10	40	47	(4)	14	H	15.5	166.6	άž	-876%	/ā	50	81		-	±01/05	u agricio.	(I)	990

#### KILOBDX"

Model Ma	Magnification	Magnification	Magnification	Objective Clear Aperature	Exit Pupil MM	Eye Relief	Angular (FOV)	FOV# 100 YDS	Range Response Time	Laser Divergence	Scanning	Range Resolution Under	, , , . <	Max Range		Wei	th	Len	ngth
			4.0		7-7-4	100.00	Jime			100 YDS	REPLECTIVE	2689	THIRS	0.2	6	195	in		
ALDZOOD BOX	104	42 mm	42	8	161	32.0 h	25.00	MAND	yes	+/ Diffes	19 to 5900 yas	Jara yas	Up to- wado you	12.0	1907	5.2	14		
WLD24605 BBs	.74	25 mm	16	15	68	36.7	25 tec	MRAD	yes	+// 0.1 (da	1/9 to: 5/80 yas	Up to NATIO yes	190 dayar	75	245	23.	1to		
P1022005 IIIO	70	25 min	16	te.	πë	157	75 pc	14 MRAU	No	e/cdfgse	Lite to baccoyds	Up to Up to	ua to leab yar	7/0	215	a.a.	192		
KLONION-NOV	(y	22 mm	47	177	0.0	344	is her	18-	1000	ry-bilyny	0000 yas	1000 yas	1000 ydv	$\pm i\nu$	125	ditt.	Įdi		
NICOTOGOTHERY	-6)-	22 mm	12	170	(0.00.1	34.7	25 mc	# CDL MRAN	7997	+0.03 (0.0)	1900 yell	1/0/10 1/10/0 vali	1200 you	64	180	4.5	to		
ALDIODO - BD4	5)	20 mm	4.0	9	7.6	39.5	75 NO.	200 HRAD	5965	ri-filtyes	-Up to IDOO yes	uio te BOO yes	Lipito 1000 year	3.2	në:	A.S.	10		

#### KILO"

KILO.																	
WILDDARDABS"	75	25 mm	36							+// D.f./es							
KLOWOW	0-	22 mm	111	fr.	8,0	541	95 year	400 MBAD	yes	+0.0 (yes	7000 Aq	1000 ptl	Up to	6.4	180	43	)09
WILGIGGO-	- by-	90.mm	80.	- 16	7.6	175	all less	- Personal	399	16.9 (yes)	DOD yes	100 year	1000 year	34	.647	15	700.

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			SIE	KKA BL	JA Z.	U									KIL	0					
сомво кітѕ	9,60	-	reto.i	(ALCOHOL)	SATT	(MAIN TIME)	Lours	-	MAG	DILECTIVE CLEAR APERTURE	EAST PUPE	EVS SELECT	ANGULAR (FOV)	RANGE RESPONSE TIME	DIVER- GENCE	SCAN BATE	UNDER 100 YOR Production	MAX RANGE BEPLACTIVE	MAX BANNE DEEM	MAX BANYON THOMS	eren
KILO16008DX / SIERRA6BDX 2-12X40 SOKURDXO	30	(a)	26	Linear	r temps		en:	(f) in fair	54	27 mm	21100		6.31	5.72-	21	E.	No SECUR	and a	=0.	tan less	-47
KILO2200BDX / SIERRASBDX 3-18X44	3 10	34	1	L1166	Cremin I		1072	(0.0 kg	70	25 6+4	i i na	5-11	tie	5.72 mm;	340LD	H.	he Olym	1000	(65 )A	Da Ye MOT (W)	7.65 5.6
KILO2400BDX / SIERRASBDX 5-30X56 SOKONBOXEI	1 11		離	811100	(minute)	0-	0	1001 ==	90	10 mm	X 0 =+	th-ma	100	6.70 sec	0.000	H	a= 0.1ym	140 To 14	45	ring Til- merity parts	W
KILO1000BDX / SIERRA3BDX 2.5-8X32 SONJOBONOI	(11)	- 11	John.	\$ \$1.44()	700	100-0	10	000	j.	10	+0	Wes	1907	0.0,000	27.	2	0 = 10 Eyell	in the	-372	on to	N
KILO1000BDX / SIERRA3BDX 3.5-10X42	De		ELL	127100-	CARPANT (SI)	No.	95	me	150	25.00		0	yak	20 m	37	Ter George	of (a) (yes	100 to	entrus entrus	156-16. (000) year	19
KILO1000BDX / SIERRA3BDX 4.5-14X44	210			829ADA	EQUIT	Money	100	29410	34	Direct	45.00	Free	790	2(25 pm)	22,	10	n stem	<i>U</i> 1 ≥ 200 →	CO PE	de la del yea	12
KILO16008DX / SIERRA38DX 2.5-8X32 SOKONDIOXOI	179		1911	4 person	copyo		-	-	100	Venn-	4400	Para	44-	Willym:	-9-	in the	, is all year	-80%	SEC	10.74	20
KILO1600BDX / SIERRASBDX \$.5-10X42 SOMMEROXU2	Am	2	1700		Oyen		-	-1-	-	74 mm	1000	p gen	145	9.77 year	25	1	A MINN	(in the michael	an h		P-1
KILO1600BDX / SIERRASBDX 4.5-14X44	Age	H	later Selfon	Childr	(1000)	-	ser	35,0	154	22 —	44-	+	64"	0,75,70	-EQ MMAD	100	er drym	2000 van	200	Do Ve Choc view	Pá
KILO1600BDX / SIERRASBDX 4.5-14X50	libro.	×	1011	e presiz-	(Smill)			s +a	14.	$\eta \leftarrow$	11-	=	6.5	0.78.00	#0 #945	*	(C) VM	2000	DET.	Go Ve Cor mi	
KILO1600BDX / SIERRASBDX 6.5-20X52 SOK/680XD5	150	,M,	Joi n	- print-	/Mounts	io.—	iay.		**	4	(1	5····	- in	ii.theac	47	nt.	in-17 years	in S	AND YAS	on te	10
KILO1800BDX / SIERRASBDX 4.5-14X44 SOK SBDXO1	ja,a	ш	ANT THE	J.	- All I		-	Min		in an	ii	í	ARC	010m	-37	£	n-relyan	10000 year	alia ta	MAPTE Clima pass	13
KILO22008DX / SIERRASBOX 4.5-14X50	515		2/11/2	12 HOL	-167	U	620	Set a	to	25 mm	7.5	Swa	14,04	2,25 ver	He was	100	1/ T/100	Upres her(E) year	050 yes	Minist Page	78
KILO2400BDX / SIERRASBDX 6.5-20X52 SIERCABEWON	11(3)		15	15 HOL	nayua)	12	-	baka	i	20.600	ú-	Édel	1.6.68*	223 vm	APIAG	1	4/ c(ve	\$460 yell	MAIS NO.	distribution of the last of th	79

				Sit.			ear Fle	id of V	lew		Eye	Relia!		100000	risk.	ective			distant.	New 2712			
Hodel	Place	Reticle	ADJ	H	H	FT is	100 ds	Hø	100 M	- 14	in .	. ,		Objective Filter Thread	Clear A	Apertur	e Wo	ight	Elevation Adjustment Range	Windage Adjustment Range	Settings	Line	ngth
			_	COM	901	ine	HOF	1/0W	100.0	100	101	- LENN	980	linéan	954	414	OWNER	CRAW	mange	congo		(554	-
HOCK	Fire	Harried an Cat	-0.0H04			ms.i		103		100		00					35.0	NIG				10.0	
		DWLRE	DUMBA		Ã0		774		50.		4.00		104	MML:06	na	34			912:05	Wilde.	W Dayleght?		
1-LOuren	Secure	HELLEGE!	DIS MEDI			-		in		405		103					100.4	Tier.	//	TO MINING		10.5	9
15029 mm	January	MOW MITTING HEITERE	0.6H04			_		140		944		104					10.0	Sep.				20.2	
ANGO6"																							
		HOSPEYS	XVII HON					-5	2.	5	.570		100	1.2.1.2			1.9		aŭ ena	šaua).	7 Dayrimin		
1.30 ) 50 mm	Test	HRAD DEV	HI MARIO	9.0	1.0	12.5	3.5	0.5		410	114	02	100	ACM2+0.75	11	1.0	90.	1501	52 (WAVI)	MEHRAD	1,00	12-24	Alta
1-AQM-1m	Tigi	1964 PGT Morantica Coll	0.5 (400)	(e).	n/	0	74	AF7	0	130	10	x+'	194			74	75.0	960	GEORGIA G TOLEG	(3-40)	* Daniel	100	1
8-16X44-mm	Tiret	- Mr. A. Milling	0.75/404	10 E	1.7	- \$2.1	6.1	6.3	68.1	xi-	ú	0.01	fur.	el 46.a (17).	U.y	. 24	-20%	-60	BD MDA W. VIVAD	BO MOA 15 AMARI	*cyclu	78-6.	L
		DEV & MBA	1075 MGH																				
6-JAXXII mm	Time	DEV- MAAD	0.16970	1		10.7		10	.03	381	111	50.	84	HIGHAIS	10	100	53.6	2019	Service Service	SOMBA	angues.	14	Ex
D-Search Date	100	ACCUMUM.	0.05.404							100	2.11	241	0.0	1.464100		14	140	314	(A smay).	Operan	140		-
		tooks taking	STAPAN																				

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	Focal			be	Pupil		Linear Fig	nd of View			Eye	Reter		Obje	ective	-	ight	Davesion	Windage	1000	worth
Model	Place.	Bettele	ADJ		14	#T + 10	O yards	Me	100 M		CH		-	Class /	within		age.	Adjustment Range	Adjustment Bange	- 44	-
				4590	eti.	ryter	604	LOW	1994	LEW	Asset .	Litter	inse	like i	нн	tract	SMA.	- mange	heribi	INCH.	MH
13110-0	4	G meldina		1070			(Ke)	187	(Ae					100	(Est	II.a	April .	1000	100	1100	30
131QW	-	(BDC   Droub in			"		50.0	10.7	14.4					12	30	149	~0.	10			137
		(Ziaconi)														63	139				
2011020	DESCRIPTION	similar Cashine		18 6	80.	-55	11.00	0.2	6.1					10	60	10.4	H10-	(80)	180	1000	31
		PRCH (Anados)						-							-	-91	(3)				
		Guedden														10.5	But .				
211 from	Securi	drifts Quality	-	9.0	9.9	ti.	n 160	11.7	K	-		-	- 69.5	10.	Ke.	(8)	i-10	600	60	37.00	16
		BOD- Dradon	0210							10	10	101	69.5			19.	2/3				
		Queller.														786	100				
10000	34000	Herry Street Her		Ŧ	11	14.5	310	8.94	1.00					-12	40	316	405	100	100	92.81	31
	-	1000-Takidowi						7								188	A70				
		Gueldin														WE	100				
	-	Harris Co., An		11.0		18.8	0.17	0.67	1.14						No	105	175	-000	1001	37.0	30
		-OC TOMBER														17.6	100				

		0	

Model	Magnification	Field of View	Eye Ballef	Prism Coating	Rumination	Motion Sensor	Waterproof	:we	light	Len	gth	Wie	defe	1166	ight
				2.0				0.7	a	JA,	-	DF.	100	100	100
BRAVOS	6	6	(i) mm	Colorina	II Bettings 4060	= KOTAC ZMIT	191	71	882	6.1	0.10	38	85.2	2.0	75
haoydd-	1n	to	ēll mm	Distretire	II Sittings IIII'D	MOTAC 7 Min	80.1	22	624	0.5	011	2.6	954	2.0	780
BROVO4"	44	##	60 mm	(mine)re	io setting: PEO	HOYAC 2 Horr HOYAC 2 Horr	796	WE.	G01	58	947	78	68.	19	75

## ECHO-

Model	Magnification	Eye	Field of View	Frame Rate	Buntime	Color / Contrast	Close Focus	Spectral Response	Digital Elevation Adjustment	Wei	ght	Las	nuth	We	iith	He	ituht
		N. Strike	1.00	7919		Sattings	Distance	Average .	Range	et .		w.	/01	19	(89t)	100	pete
0-0-	Shadowill	Limitely	- foreign	3042	Techni-	Brono- country.	3/2	Self-ion Symmetrics Imperior With Emp	MICHAELA MICHAELA	14.5.7 16.6.	-AH /-	057 4.7	1047	9.6	76.	117	79

FOXTROT"

Model	Led Output	Operating Mode	Puntime	We	igNt	Lee	squi	w	oth	Ha	eight
200	0,000	Prode		- 42	- 6	166	100	'n	***	19	***
FORTBOTLEST	1100 t Lumer (	Self Edition	(Harr	(3)	371	30	965	10	29.4	12	81
FONTHORF	100 / 200 / 100 / 10005	Postery artistring	Stort	30	à4	-31	79.0	12	50.0	12	10
FOXTHOTIX	=01	-contract of recover	15mm	10	34	24	ET Ē	92	50.4	13	33
LIMITATE TO STATE OF THE PARTY	1000	communicación de Salar	1 Same	-10/	1547	2.6	-0.9	3,6	tesa	110	X

#### JULIET"

Model	Magnification	Field of View	Clear	Exit Pupil	Eye Relief	Diopter Range	Adjustment Bange	We	ight	Ler	igth	Wi	dth	He	igna
		7270	Apresiture	1.00	7.22.35	stange	tange	6,5		lys.	see	N	inn '	19	m
parme	- Con-	- 41	24	Him	50 tore 1	4/47	147-30 310;-	141	416	5.7	13716	192	466.5	30	73.6
(ALBERT	le .	5 8 PT	24700	9 me	62 nm	9.5	47-48 8004	12.8	257	3.0	107	20	51	2,6	66
JUDIETA"	81	9	28.600	(Bent)	AZ MM	4531	145 13 6400	375	387	40	677	20	TI.	2/8	70
JAMES HANGEON	-	++-	25 mim	\$1 (ne)	6.5 mm	Appl	A/SSEROA	0.0	201	12	80.	3.9	0.0	2.4	100

#### LIMA"

Model	Loses	Operating Mode	Run	Time	Adjustment	Spot Size	We	ight.	Len	igth	Wi	dth	He	ight
		rioue	Red	Green			92	- 4	.04	201	196	мя	94	701
Turvia	Chart TA	(Decrease)	Altheor	og Hages	V/ noage + Bleyspans	\$ 11 50 fs	16	45	20	51	320	á),	6EE	33
(mws20-	Clars SRI Read on Consum	Instant Activation	-1Mag	>5 (400 m)	Windage + Hoyether	E# 36 Tr	40	313-4	21	1000	YAS	laō.	42	2000
(m+4.nec=	Constant Final Or Green	пыва Астуация	riren	STREET.	Windwale * Timbers	5.8.55 (r	131	37	3.6	00.5	30.	29.5	10	10

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R	o	M	Е	o	_

Model	Magnification	Eye Relief	Objective	Red Dot Size	Murination Settings	Elevation Adjustment	Windage Adjustment	Wei	ght	len	gth	wit	dth	he	ight
			Aperature		Semiga	Range	Range	iot.	0	- 04	101	100	run.	16	Per
districtions	i ii	(briegal)	28 mm	E MOA / E MELA	h Day	100406	50 Hole	A	M	116	acre	25	217	91	20h.
FOMEOIPRO"	TA.	Lineage	50 mm	SMOA7 6 MOA	10 Digiçime i - 2 Nili	100 NQA	юанок	TD	79	19	46.6	12	317	55	\$T
HBM( G1F	- fu	printed	Saj mm	SHOW	B Daysman	300 MON	100 HOA	в	26	18	419	14	(4)	ia.	25
drillings=	6	Director.	pl.mm	J MOA / B MBIA	17 Daylimy 1	tod Mch	DOMON	134	146	13.6	an 2	37	þó	M	200
ADMEOS.	le:	Deliveral.	25 years	± MGa	9 Darime	ACM DOL	NO MOV	()4	(4)	(24	60	0.0	.29	(65	4
намерзис-	j.	printed	35 mm	3 MGA /*	S Dayona /	909409	, AQM/QB,	75	-00	20	54	141	36	ļķ	Je
RDMEOSMAX"	ű.	printed	30 mm	5 MOAV 6 MGA	10 Destine	80 HOA-	BOMDA	A.S	-41	20	51	149	33)	14	ú
som/da/-	ű	Leiebd	20 mm	PAGA!	2 Dayona 7 Mil	100 1001	lonsion	3.1	9	1.1	Ban	1,8%	¥1 (6)	2.40	13
cowCotos	(V	19800	25 (c)M	21000	O Days = 0.1 2 his	IOU PLUA	100 MSA	76	755	20	005	1 62	46.3	15	6)
RomE045*	Sp.	protected.	30 mm	PHOA!	O Days	100+104	100 HOA	76	76	3.3	85.6	(8)	k	is	ŝi
60-634F	The Control of the Co	Direct	20 Am	21/DW	Days 7.W	100 H0W	(DD MOA)	(76	(06.)	(24)	36	1,80	46.2	16	i.i
ROMEOSXBR	- Un	unmed	20 mm	240A	3 Qayrime I'	V-10'HOA	I/- YOMOA	(3.0.1	109	(25)	675	14	45.0	3.0	XX
HIMIOSX:	50	printed	Stem	2 HOA	8 Daytimu ( 7 NV	300 MOA	(odiyio)	57	150	28	11.5	14	134	36	160
ROMEOS TINEAU	í.	colonel.	20 mm	2 MBA	TOWNS 2 NV	100 M/DA	(DD MDA	· 5)	145	25	62.7	15	\$81	11	2,9
ROWEOS"	- ij	United	30 tres	2 1404	# Oaytinal	50102	1/4 60 MQA	48	1981	2.0	75	16	4)	14	.50
PDM607"	li.	unique	30,000	2 H(\$1)	2 Day 70 1	100 (4.0)	DOMON	dş	250	i B	120	y)	311	2	76
404/035-	í.	painted.	a min	24504	9.0wt = 1	100 MOA	(00M0A	led	281	1,62	(8)	36	100	26	-11

#### ROMEO"

Model	Magnification	Eye Relief	Objective Clear	Red Dot Size	Illumination Settings	Elevation Adjustment	Windage Adjustment	We		len	gth	wic	ns	Tre	right
	1.2	-	Aperature		Settings	Range	Range	oz		196	-	.04	in	.19	m
померат	14-	Unimited	al in	d Hills	10 this in 1 3 to V	A/ 70 HOW	F/ TO HOA	(3.7)	388	3.8	89.4	),nr	50	bie	0
ROMOGN	161	Lysimi(ec	58 mm	IMOV	(O'Daytime).	-+ G 70.MQW	47-70 HQA	10.1	292	35	99.4	1.97	500	28	91
HOME CLANSIE	- Dr -	(Limited BC)	30.00	2 804	10 Daysine / Thy	IDO MISA	100 MOA	4.0	188	91	79	5.8	30	2.0	èni.

#### OSCAR"

Model	Hagnification	Exit Pupil	Clear	Close Focus Distance	Eye Relief	Linear FOV M at 1000 Yards	Linear FOV M at 1000 M	Angular FOV	Waterproof Level @ 1 M Eye Piece	We	ight	Len	gth	Wh	ath	He	ight
				10000		10000	1000	100	Attached	az	4	794	KK	96	(HOC)	185	(year)
OSCARB!	\$1.60 x 60.	2.00.7007/ 3.45.000	40,000	200	P-Roman	f004/23/20	10/01	2-64	Arm	(42)	1920	1127	188	40	(0.)	0.11	550
OFTARE	10/10/14	1.5 cm	36 mm	8-m	Helms	170,0300	(a joint )	SAF / SAF	- Bytting	196.	158	wit.	(rd)	19	-hg	10.	M

#### XRAY-

Model	Housing.	Humination	Front Sight	Rear Sight	Sight Picture	
#-RAND	Sau	frit Lim	High Control Court Collect	Supto Bulev.	\$ Day	

#### ZULU

Model	Magnification	Exit Pupil	Clear Aperature	Close Focus Distance	Interpupillary Distance	Diopter	Eye Relief	Linear FOV FT @	Linear FOV M #	Angular	W	tfgit	Le	ngth
			Christian	Discourse	Ussance	Honge	12.5	1000 78708	1000 H	191	04		19	****
Zulu9"	11 X 45	41.mm	deme	én	56 mm - 74 mm	4/- 1	16.2	≋ H	105 =	6.00	33	960	7.5	150.5
	15 w. 60	10 mm	Minn	910	56.mm- 73.mm	me !	1915	2000	762-	480	45	1800	2.61	1000
20007*	10 ± A2	4.2 mm	42 mm	590	56 mm	4/13	0-	54/11	D4 =	65)	33	(300)	5.8	167.3
70000	10 e#2	43100	(42	1520	56 mm - 74 mm	.9/41	(See)	≥ H	kis m	19.00	1943	1995	1920	1524
0.000	10 4 50	ijam.	(See	nsn	56 mm - 78 mm	9/6.8	ikee	#8 ft	more:	3.0	500	578	3.8	190
	16×42	162-	All mer.	131H	56 mm	-7-3	M	196 (†	6642-	16M	20	SHE	7/1	180

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# SIG AIR' SPECS

Model	Call	har/m	An Cap.	Velocit	ty Zies 103		Measurer	rienta (III)		Weight (fb)	Operating System	Construction	Sights
	.177 ca)	.22 čuš	B,0 mm	F.P.S	365	Length	Height	Wests	Barrel				
8117	-20			14341	5.0	100	5.0	-13	3.0	9.5	000	PROF / PRO	-Walle Blue
DAMES!	Ad			QH	17 417	38	4=	10	12	12	1.07	1668/759	1.000 high lightery Fluid Signal
WIF #8			-0%	410	20	6.6	160 I	45	140	18	cer	769	Waya Dist
別麦	=112		[6]	4(0)	2.0	107	630	14.	4.8	35	259	Metal	Write Flot
MENVE	20			18317	3.0	5.0	8.6	1.2	1.6	3.0	687	THELE	www.laction
120	16			460.	433	105	3.1	15	39	36	TER	Melik	WaterAlth
5330.	50			(2010)	5.0	7.9	5.6	15	50	ie"	481	Huai / Philip	Www.Doi
Mr bersen			21	407.400	0.077.031	3.5	1000	14	1.6 bx	125	584/792	Holar/Dos	Ten to Dist / Mount Port
he/morest			30	440 / 820	20170.01	1,3	1,65	113	140	. 10	1983/356	1944/796	Write Dat / Hours Pla
American areas			24	maril		100			790	(6)	100		Alberto Smil

# SIG AIR SPECS

Model	Calib	er/Mag	Cap.	Velocity	we to)		Measurer	ments Ciril		Wright (Ib)	System	Construction		Sights /	Optics	
	177 cal	32 pal	6.0 mm	FPS 177 22 CAL	FFE FFE FFCAL	Length	Height	width	Barrel				Fib-Up	20mbi SiG 20R Red Dot Optic	1-4 x24 Scope	WHISKEY
ALCO:	11	1		10 46	20/00	444	80	(5)	We	#616	G.M. Printers	Sim are West				
V-11-		-50			12	19.8	100	2.8	18.0	100	Non- Statement Missorross	-				
Hor	30			760	1075	1147	10	18	48.	m.	(000)	Heat Trial	24	141		
160	901			15(1)	3.06	242	6.6	18	9.5	date	(260	Most For	+	*		
No mound			No.	2.65	0.06	2011	9.0	(4)	3.6	Union	Automace Erectro Gun	haci				

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SIG-GLASSCOCK00008910

# PISTOL SPECS

Pistol Models		C	Miber / Ma	aktine Capo	icity			Actio	in Type				feasument:			Weight	w/Mag			Sight	-		Gr	(DIS	P	rame Mater	140		*	ame Finish			Slide Material		Side Fin	SN			Othe	er -	
	ROACE	- june	3575/6	-W8204	45ACP	10mm	DA/SA	SHT (DA/3A)	SAO	STRIKER	Langth (h)	Height (in)	Wateruns	Barris Langth (III)	Signt Rades (m)	Allery/Cruty Guz?	- STATISTICS (GD.): -		Contrass	Naged Surfer	Adi Targes Red Dot Date	Ецира	DAD	Custrim Wood	Hubber	Spanish	Dolymer	BACS HC	хамом очи	NUTROW*	Stammin	Porjeter	Stainliby	FDE / Cavette	HITROP	LEGION Gray.	Accessory Rasi	Threaded Barry	Optic Heady / PX	Bearings	Ambl-Safety
PETRIET		3							15		R.4	5.3	1F	3.0	87		383		1							1.															
0.6		10.4.0																										100													
727					8			-	- 1		7.7	3.6	4.3	4.4	6.3	55.4				( )																	2.0			+	*
WALKS IT BURNELL						15		+			63	9.5	7/5	9 0	6.9		144-5			100			9			14							*							+	4
rêm.		15					1.		411		2.7	5.5	9.5	1.4	6.3	544						4 4	- 2						P. 0	-01	+									+	+
AND THE RESERVE OF THE PERSON		115						+			75	9.4	15	3.0	9.7	816						e   e	+					+					*				1			+	+
AND AND		10									7.6	9.6	1.3	5.9	5.8	815							. 3.								1.									+	
SIT OF		1920									1910	5.5	16-	417	0,0	73%						74				1					+		- 4	19			w				
530 Fmil		11/21									7.2	5.5	1.6	3.6	.5B	26.5																		1.0							
930 FLUI 635		107								191	an-	5.5	1.3	1.7	6.8	28.5			- 0			- 10				50					0		- 0								
130 COMPACT		18			9						7.0	5.5	1.8	3.9	58	25.8										100															
CONTRACT CLASSICS		-0"								- 2.	88	6.2	16.8	1.7	5.6	58.5															12								- 4		
STREET COMMET		16									7.0	D.D	1.4	3.9	58	381																									
232d HPVE LEGION		107								1.0	18.5	5.8	1.6	5.0	6.9	815						-									- +										
\$25,000 LL		4									62	5.5	1.3	4.2	6.6	29.5										100							+						iv.	+	
15APHOCK OICE		18									Prox.	5.3	- 53	8.6	16.0	25.1						+				1					1.		-				1		14	+	
PROVIDULL EXP.		3									8.2	5.5	19 -	47	0.0	25.2										100											1		100	+	
PER COMPACT RAP		15									Att:	5.5	1.4	3.0	8.5	15.1										1.											1.5				
PSID XCARRY LEGICINI		100								134	(B.T)	5.6	1.6	4.6	5.8	40.0						- 10				130					0		- 0				100				
GIOXVIAE		17									5.7	5.6	1.8	8.7	68	29.5										100						1									
4007F		15.									7.4	5.7	1.3	3.0	8.8	19.0			1			12					2					10					100				
in .					8	6					67	9.5	4.4	aé	16.5		an a																			- 0.					¥ .
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9 ir		168									'sn		TI		_	15.0				9		1	+					,					,	190						+	+
15c	- 6										5.5	2.9	9,1	2.7	1.8	18.2						4	-					4								14					
		30.									-58	12	150	31	47	78						-				1						34	9				-				
W. 346		10								_	4.8	4.0	Lo	(A)	164	108										1.															
		17									6.8	4.0	-7.1	57		OUT		1				- 4																			
Manager over		10								-	6.8	8.5	15.0		-	20.1							-			1							-	-		-			-		

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# RIFLE SPECS

Piffe Models	Caliber	Action Type	Operating System	Stock Type	Forend Type	Weight W/o Mag	Overall Length	Collapsed Length	Folded Length	Barrel Length	Silling	Trigger Type	Mag Type	Mag Capacity
SIG MCX VIRTUS														
SIG HCX VINTUS HVITHON	Sistemato	Sumbauci	Continue in the	Team (Print Self-control)	Insertinat Visitorial	7.0 to	8.81	mAr	36.5	merc		NVIIIon March	parts (ven	50
PMCC-with PCB tt 5	5-56 NATO	Seminator	distriction con	France Transmission	Insuringed Insultin	146	11 Ar	9.781	32.0	78.61	800	Zellarge Hance	ARAS Type	30
PMCX eith PCB 9	100 6.4	Service (	Sol Patrilly Rotating Bolt	First Taking First	F/66-F156F M-1/2/F	128	(SEP	4.6	19:55	9.0"	15	2-518pii -18860	AGISTIPA	180
SIG MCX RATTLER														
SIGMEN BAT (LER SBR	\$60 BUK	Services	San Pettins. Stocking Both	Found Refined	Fragilitad Next (St.	176	201:	100	OF:	35	75	7151808 Match	ARI IS Type	/30
SILENCX RATTLES SIZE	5.50 16(17)	Similato	See Dation Total by Self	Timed Historia	Tree-Tiget MrUDE	57 in	13.5	re/Ar		15	10	2-Tange Merch	Amilia Vypa	50
SIGMOX HÁTTLER POB	100 ml=	beide	Shirthan Rotating Balt	Fined Folding-PCII	Programme H-LOE	5.7 (0)	27.0	1404-	-W-	15	18	2-Stage NAMEN	Amazyypu	.00
SHOW WATER BODY	à séveres	Sm4.0	Sins Patien Hotstelly Bot	Foliation Fire	194-7940 In par	5710	251	ww	w	45	Vr.	2 Stage Match	AMIDTON	40
SIG MCX RATTLER CAMEBRANE	200 GTW	Servi-Auto	Say Parters, Retailing finds	Foliana RCB	Important Motion	666	20.01	9/3	3"	160	15.	2 Observed Management	AR IS Type	90
SIG MPX														
SIG MPS FICE	дын	Services	Gulf Return Receiving Bain	Tuly/Trail Scientificie	F09-04000 50-0000	100	3200	187.60	20.01	mpc	1110	Print Days	mpy.	30
SIC MPK K PCB	BANA	Serious.	Sus Astern Rotating Sole	Follows PCS	1000/140.00 1400/000	60%	72.9	107.6-	13.5	9.5"	710	Dept. Street	**PX	10
SIG MPX EIDPPERHEAD PCB	SHR	Sim ruts	Cos fistory Rotunno Bris	Tomacina eco.	11/11	1970	100	100	76/81	12	110	MIL-BREC	1959	30
SIGMINI EDIPPERHEAD & PED	IIIANA.	Sim-ruly	Sint Patient Hotaling Son	Timesona	10/8	389	10	100	76/4	42"	110	Straph States Townsy	Mid	90
SIGM400														
SOMES THEAD	5.30 (14)(2)	Sees-Bullo	Direct Gas	S-POLITICA TIMEGIOING	Free-Free	138	30.5	1870	19/4-	180	716	National Control of Co	AMISTOR	201
SGMOOTREAD PSTOL	±semmo.	Services	Direct Gas impropriment	Totalguing, Brace	Figurity at No. 10 King St.	100	63.0	1876-	1676	11.5	20-	Pullsted Polisted	AR IS TYPE	30
SIG716G2														
SIGTRE THEAD	TERMIC	Restaura	Direct Gas represent	A-Coption Tolescropes	framiliar A-LDs	110	pa	130.81	740	10.00	7,942	Marmon Followd	925 San	10
CROSS BOLT RIFLE														
CROSSBOLT	ESTM	Bolf Action	NA.	5.5 Pricition Stock	Programme MHLD/C	-156	30	s in	44.	12	116	2-Stage Match	Aick	Ė
CROSS BOLT	.558.W04 275.4 CHM	Lou setten	986	Siti Presiden	Final-Final Marchine	126	35	INF	-25	- 3-	tro irea	2 215gd	WES	- 1

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MKT0008

# Tom Taylor Declaration Ex. K



# Detective sues Sig Sauer after she says her holstered P320 handgun nearly killed her

Gunmaker has previously denied liability for similar claims involving the P320

By David Scott, Gerry Wagschal, Knez Walker, Alexandra Myers, and Lauren Effron August 24, 2021, 1:52 PM





Detective sues Sig Sauer after she says holstered P320 pistol seriously wounded her Brittany Hilton says her P320 was holstered in her purse when it fired unexpectedly. Nine lawsuits are pending against Sig Sauer for similar claims. The gunmaker has previously denied liability.

Det. Brittney Hilton had no idea she had just been shot. All she said she felt at first was an incredible amount of pain, and a "very sick feeling."

"I was cold at some points, shaking. The fear kind of takes over, the adrenaline takes over," Hilton told ABC News. "I just said, 'Am I going to die?"

"I said, 'Please just tell my kids that I love them and don't let them find out on social media that I've been shot," she continued. "I didn't know if I was going to make it to the hospital."

Hilton, a mom of three who has been with the Bridge City, Texas, Police Department for 11 years, said the bullet came within one millimeter -- the edge of a penny -- from killing her.



Det. Brittney Hilton has filed a \$15 million lawsuit against Sig Sauer. ABC News

But what Hilton said she also didn't realize at first was that the bullet had come from her own service gun, a semi-automatic pistol called the P320. It was still holstered inside her purse, according to the police report.

Hilton is now suing gunmaker Sig Sauer over the December 2020 incident.

"Never, in my wildest dreams, would I have believed that my gun would just have shot me," she said. "Gun owners don't want to think that their gun can just go off without the trigger being pulled."

MORE: One nation under fire: A week's glance at gun violence ripping across America  $\rightarrow$ 

Sig Sauer's P320 is widely used by police departments across the country, and is a big seller in the civilian market, with about half a million sold nationwide.

But now, P320 is the subject of multiple lawsuits in connection with incidents like Hilton's, where owners claim the weapon fired without the trigger being pulled.

Hilton said she was inside the Bridge City Police station when her gun went off. She still has the purse with the bullet hole in the bottom.

"I picked up my bag, my keys were on top," she said. "As I walked around my desk, my purse swings out and it shoots out the bottom of my bag."



Det. Brittany Hilton says her P320 handgun was in its holster when it went off inside of her purse. ABC News

It happened so fast, Hilton said, that she didn't process what was going on at first, but she smelled the gunpowder.

"And then I took one step, and I felt this pain. It felt like a hot rod of metal had just been placed not only in my private, but through my leg," she said. "and it [the bullet] exits out [of] my lower buttocks."

Hilton said she still has pain from her injury.

"There's never a point that I'm really not in pain unless I'm laying down," she said.



Det. Brittany Hilton shows the bullet hole in the bottom right corner of her purse that she says was caused by her holstered P320 handgun firing unprompted.

**ABC News** 

Attorney Jeffrey Bagnell represents Hilton and several other police officers who have filed individual lawsuits against Sig Sauer over the P320.

"I think it's a very, very serious safety problem for law enforcement and for the public at large," Bagnell said. "I'm not aware of any other semi-automatic pistol today that has this problem."

Hilton's \$15 million lawsuit said, "there have been 54 reported uncommanded discharges of the P320," meaning the gun went off by itself, over the last five years in 22 states and Washington, D.C.

Sig Sauer did not respond to ABC News' request for comment. The gunmaker has previously denied liability for these incidents and, in some cases, blamed the plaintiffs for negligence. The gunmaker said in an August 2017 press release that "the P320 meets and exceeds all U.S. standards for safety."

After Hilton's incident, the Bridge City Police Department had Sig Sauer examine the gun. In Sig Sauer's response to the Bridge City Police Department after Hilton's incident, the company contends that "a foreign object entered the trigger guard (causing) the pistol to discharge."



Det. Brittany Hilton's issued P320 handgun that she says went off while holstered inside of her purse. ABC News

Hilton disputes that, saying the gun was holstered in her purse and that it would be near impossible for something to wedge inside the holster and be enough to pull the trigger.

"I'm very pro-gun," Hilton said. "But this gun is so dangerous, and it just scares me that there are so many out there that don't know the potential it has to go off."

There are currently 10 pending lawsuits against Sig Sauer for this particular firearm, all alleging the gun went off on its own. A number of those suing the gunmaker said they are in law enforcement with extensive firearms experience.

"It's not credible to claim that people with this amount of training, this amount of skill are all shooting themselves," Bagnell said. "These are experts. It's happening all over the country. ... you would have to conclude there's a problem with the product, not with the people."

MORE: Biden announces limited gun control actions, saying gun violence epidemic 'has to stop'



SIG P320 handguns are displayed at the SIG Sauer GmbH booth on the exhibit floor during the National Rifle Association (NRA) annual meeting in Louisville, Ky., on Friday, May 20, 2016.

Luke Sharrett/Bloomberg via Getty Images

Virginia Sheriff's Deputy Marcie Vadnais was injured in 2018 when she said her P320 handgun went off on its own as she was removing the weapon from her belt, still in its holster. She said the bullet hit her in the thigh and shattered her femur.

Sig Sauer settled her lawsuit, without admitting wrongdoing, for an undisclosed amount of money the day after the jury heard Vadnais testify at the start of the trial.

Vadnais said she wants the gun off the market.

"I saw what it did to me. I saw what it did to my family. And I don't want that to happen to anybody else," she said.

Bagnell said he's been pressing Sig Sauer to recall the P320 for years, noting that firearms are not subject to any federal safety regulations.

"If this were a car, a phone, a refrigerator, it would've been recalled long, long ago," Bagnell said. "So I think it is unconscionable, given the number of incidents of this gun defectively discharging without a trigger pull would necessitate that someone order it to be recalled, and only Sig can do that."

While Sig Sauer has continued to dispute that there is anything wrong with the P320, the company offered what it called a "voluntary upgrade" in 2017, saying, "the upgraded P320 has lighter internal components, including a new thinner-profile trigger and a lighter sear and striker. These upgrades will enhance the protection against unintended discharges if the pistol is dropped."

Then the gunmaker began manufacturing all P320s with the upgrade.

Vadnais' P320 handgun was not the upgraded version, however, Hilton's P320 was the upgraded version and her lawyer is convinced the modifications have not fixed the problem.

"The defect has not been addressed," said Bagnell.

Peter Villani is a veteran police officer with 35 years of experience, including as a firearms instructor and a Sig Sauer-certified armorer -- someone who is certified to repair and inspect a firearm -- of the P320. He said he believes there are design flaws and manufacturing issues with the firearm.

"I carry Sig. I own Sig. I just don't own a [P]320, nor would I ever," he told ABC News, referring to all models of the P320 pistol, including the upgraded version.

Villani, who is an expert witness for Hilton in her lawsuit, said he began investigating the P320 after an officer in his police department was injured by an upgraded version of the gun.

He also referred to body camera footage captured in 2016 that shows an officer's P320 firing as he was getting out of his cruiser during a traffic stop.

"Something hit my leg," the officer can be heard saying on the video. "I don't know if I'm shot or what... I just for the life of me can't figure out how that went off."

A second officer whose body camera captured the incident responded: "Yeah, because there's no-your seat belt wouldn't have--"

"No, the trigger was completely covered," the first officer said. "I don't know. I honestly don't know... I'm glad you're my witness."

"When I see videos of police officers getting out of their car and their weapon discharges in their holsters ... There's a problem with the gun," Villani said.

Firearms expert and ABC News consultant Joshua Harrison agrees there was a problem with the P320, but he believes it's been fixed.

"There were a lot of changes. It was expensive, and they would not have done that for no reason at all," Harrison told ABC News. "In my opinion, the only reason Sig would have done that is if they knew there was a safety problem with the original gun, otherwise they would not have done it."

Harrison said if indeed there are cases of the upgraded versions of the gun firing on their own, it is unclear what would be causing them to do so.

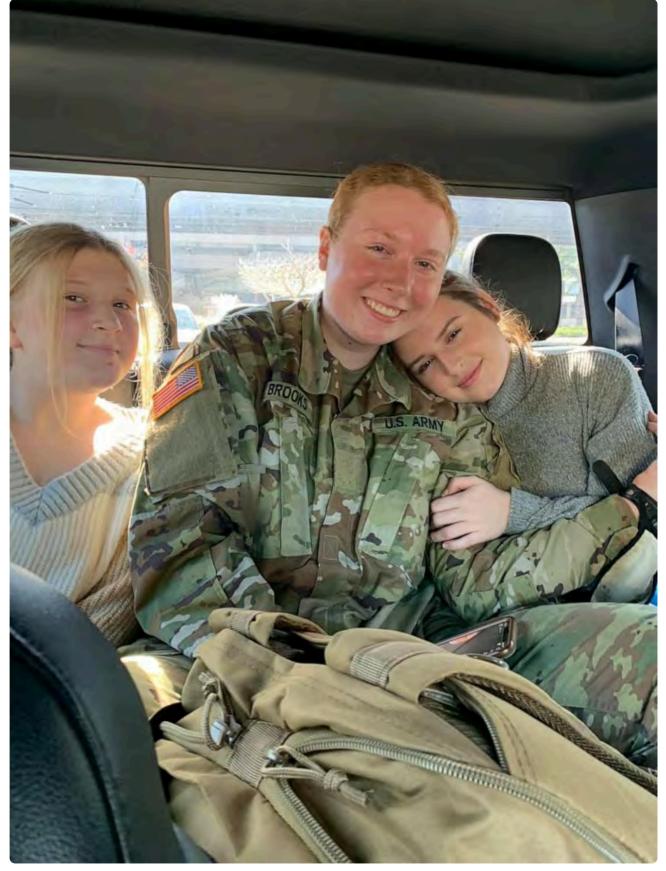
"I have not seen enough to convince me that the upgraded version's dangerous," Harrison said. "I do not have an explanation for why the updated version should have these complaints from trained individuals. If it's not legal momentum, then it would have to be some other mechanism of failure."

Still, there are at least two police departments that had safety concerns about the P320 and replaced it with a different gun.

In Philadelphia, the transit police SEPTA swapped out its P320s for Glocks after one of its officers had a P320 go off unexpectedly in 2019. The bullet in that case narrowly missed the officer and a woman nearby.

In Stamford, Connecticut, an officer sued Sig Sauer after he says he dropped his P320 and it shot him in the knee. That department replaced all P320s in 2017.

Hilton said her department in Bridge City is ordering new guns, but in the meantime, many of its officers still carry the modified version of the P320 pistol.



Brittany Hilton has three daughters between the ages of 13 to 20 years old. One of her daughters is currently in the U.S. Army and is using the military version of the P320.

**Brittany Hilton** 

"I have a lot of anxiety every day [over this]," Hilton said. "The fact that I carried my purse into my house every single day and my children were at home ... Sig put their life at risk. Sig knows they put their life at risk."

She said she continues to live with the physical and emotional scars from her incident.

"I think that this gun needs to be removed from the shelf," Hilton said. "I hope it doesn't take something fatal, and I'm hoping by bringing awareness to the public that maybe it'll bring attention to Sig to say, 'Hey, this gun's an issue, and before it gets someone killed, take it off the shelf. Stop manufacturing this gun. Find a different solution."



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# Tom Taylor Declaration Ex. L

## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS BEAUMONT DIVISION

BRITTANY I. HILTON,	§	
Plaintiff,	§ 8	
v.	\$ \$ \$	CIVIL ACTION NO. 1:21-CV-00441-MJT JUDGE MICHAEL J. TRUNCALE
SIG SAUER, INC.,	§ §	
Defendant.	§	
-	§	

## MEMORANDUM OPINION AND ORDER

Before the Court are Defendant Sig Sauer, Inc.'s Rule 702 Motion to Exclude Evidence and Opinions of Plaintiff's Expert, Timothy Hicks [Dkt. 26], Rule 702 Motion to Exclude Evidence and Opinions of Plaintiff's Expert, Peter Villani [Dkt. 27], and Motion for Summary Judgment [Dkt. 28]. For the reasons set forth below, the Court grants Sig Sauer's motions.

#### I. BACKGROUND

Plaintiff Brittany Hilton, a Bridge City police officer, claims that she was injured when her department-issued Sig Sauer P320 pistol discharged a round into her upper thigh without its trigger being pulled. Ms. Hilton was carrying the loaded pistol in her purse, along with other loose items, when it discharged. Specifically, the firearm discharged in Ms. Hilton's purse as she walked around her desk in her office, just after she put a bottle of body spray into the purse and looped the purse over her arm. Ms. Hilton subsequently brought this suit against Sig Sauer, the manufacturer of the P320 pistol. Ms. Hilton's live claims are for strict product liability, negligence, and breach of implied warranty of merchantability.<sup>1</sup>

Case 6:22-cv-03095-MDH

<sup>&</sup>lt;sup>1</sup> In her Original Complaint, Plaintiff alleged additional causes of action for breach of express warranty and violations of the Magnuson-Moss Warranty Act, 15 U.S.C. § 2308(a). [Dkt. 1 at 36–37]. She stipulated to the dismissal of these claims, with prejudice, however. See [Dkts. 8, 9].

#### II. DAUBERT MOTIONS

Sig Sauer seeks to exclude the testimony and opinions of Plaintiff's experts, Timothy Hicks and Peter Villani, on the grounds that they are unqualified and that their opinions are unreliable. Rule 702 of the Federal Rules of Evidence governs the admissibility of expert witness testimony. It provides: "A witness who is qualified as an expert by knowledge, skill, experience, training, or education may testify in the form of an opinion or otherwise" if:

- (a) the expert's scientific, technical, or other specialized knowledge will help the trier of fact to understand the evidence or to determine a fact in issue;
- (b) the testimony is based on sufficient facts or data;
- (c) the testimony is the product of reliable principles and methods; and
- (d) the expert has reliably applied the principles and methods to the facts of the case.

#### Fed. R. Evid. 702.

Whether an individual is qualified to testify as an expert is a question of law. *Mathis v. Exxon Corp.*, 302 F.3d 448, 460 (5th Cir. 2002) (citing Fed. R. Evid. 104(a)). "District courts must be assured that the proffered [expert] witness is qualified to testify by virtue of his 'knowledge, skill, experience, training, or education." *Wilson v. Woods*, 163 F.3d 935, 937 (5th Cir. 1999) (quoting Fed. R. Evid. 702). "A district court should refuse to allow an expert witness to testify if it finds that the witness is not qualified to testify in a particular field or on a given subject." *Id.* Experts need not be highly qualified to satisfy Rule 702 though. *Huss v. Gayden*, 571 F.3d 442, 452 (5th Cir. 2009). "Differences in expertise bear chiefly on the weight to be assigned to the testimony by the trier of fact, not its admissibility." *Id.* But the "witness's qualifying training or experience, and resultant specialized knowledge" must be "sufficiently related to the issues and evidence before the trier of fact." *United States v. Wen Chyu Liu*, 716 F.3d 159, 167 (5th Cir. 2013)

(quoting 4 Jack B. Weinstein & Margaret A. Berger, Weinstein's Federal Evidence § 702.04(1)(b) (Joseph M. McLaughlin ed., 2d. 1997)).

In *Daubert*, the Supreme Court outlined four non-exclusive factors for courts to use when evaluating the reliability of expert testimony: (1) whether the expert's theory or technique can be or has been tested; (2) whether the theory or technique has been subjected to peer review and publication; (3) the known or potential rate of error of the challenged method; and (4) whether the theory or technique is generally accepted in the relevant scientific community. *Daubert v. Merrell Dow Pharms.*, *Inc.*, 509 U.S. 579, 593–94 (1993). When evaluating a *Daubert* challenge, a court's focus "must be solely on [the expert's] principles and methodology, not on the conclusions that they generate." *Id.* at 595.

While *Daubert* provides a "flexible inquiry" rather than a "definitive checklist," *id.* at 593, 595, it requires that "an expert bears the burden of furnishing some objective, independent validation of his methodology." *Brown v. Ill. Cent. R.R. Co.*, 705 F.3d 531, 536 (5th Cir. 2013) (internal quotation marks omitted). "Without more than credentials and a subjective opinion, an expert's testimony that 'it is so' is not admissible." *Hathaway v. Bazany*, 507 F.3d 312, 318 (5th Cir. 2007); *see also Brown*, 705 F.3d at 536 ("The expert's assurances that he has utilized generally accepted principles is insufficient.").

## A. Timothy Hicks

Timothy Hicks is a mechanical engineer who spent most of his career in the automotive industry. [Dkt. 26-5]. While Hicks has never manufactured a firearm or a component of a firearm, he testified that his automotive experience required similar processes and approaches. [Dkt. 26-6 at 23:10–17]. He is not a gunsmith, nor has he ever taken any gunsmith courses or been employed by a company that manufactures firearms. *Id.* at 23:22–23:4. He also has never published anything

on the manufacture or design of a firearm. *Id.* at 24:5–10. Hicks has never seen a firearm assembled from an initial production standpoint, or manufactured. *Id.* at 25:8–13. And before his involvement with similar P320 cases in 2022, he had never looked at drawings or internal components of a pistol similar to the P320. *Id.* at 24:11–19.

Hicks' opinion is that if two conditions occurred, then Plaintiff's gun could have discharged without a trigger pull: (1) the striker had to have become disconnected from the sear; and (2) the safety lock had to have failed. [Dkt. 26-6 at 26:6–20]. This theory requires that "there has to be some type of motion or inertia or vibration to the to the firearm to make it discharge." *Id.* at 28:14–29:2. But he could not answer how much inertia or vibration would be required, *id.* at 29:3–10; whether the vibration or inertia caused disengagement immediately or incrementally over time, *id.* at 29:16–20; or whether firing the gun would reset it, thus requiring additional force to move the parts out of place again. *Id.* at 30:3–12.

Hicks ultimately concluded, "[b]ased on [his] investigation and the work conducted to date . . . [that] the physical evidence . . . supports Detective Hilton's description of the circumstances of this incident" and that her P320 "was defective and unsafe for use." [Dkt. 26-4 at 20]. Specifically, that "normal and expected movement and vibration while holstered caused an uncommanded discharge with a combination of some or all of the defective conditions" described in his report, including:

- 1) Surface quality (no secondary processing) and misalignment of interfacing sear step and striker foot. With both of these parts being out of specification, the striker became disconnected from the sear without the trigger being pulled.
- 2) Surface quality, rounded surfaces, and misalignment of the face of the safety lock tab and the vertical stop face on the striker body, such that both of these areas failed to prohibit the striker from moving forward during the subject event.

- 3) Axial variation and gaps between the striker pin and striker housing with slide movement causes misalignment of the safety lock tab to the striker pin body, and the striker foot lateral position to the sear step face. This occurs after each round is fired and can affect the orientation of the two components each time.
- 4) Ability of the slide (and therefore the striker assembly) to move vertically and laterally relative to the sear reducing the interfacing surface contact area even further, which will cause the striker foot to become disengaged from the sear face. This relative movement occurs while properly holstered from normal body movement and usage of the firearm.
- 5) The striker foot is unable to engage completely on the surface of the sear step due to the changes in the upgraded design, manufacturing processes and lack of secondary machining, and fit-up and variation issues between the parts discussed in this report.
- 6) The removal of the safety lever return spring by Sig Sauer allows the lever to rotate out of position when the pistol is carried in a muzzle down orientation, which can also contribute to the safety lock to be out of position. When this issue is combined with the axial variation described in item 3 above and the part quality issues, it allows the striker to move forward completely when it becomes disengaged from the sear. The safety lock only has to be out of position or out of tolerance by the thickness of the stamping which is 0.9 mm.

[26-4 at 20]. He testifies that each of these alleged defects *could have* contributed to Plaintiff's P320 firing without trigger pull but he cannot say which ones specifically caused the firearm to discharge. *Id.* at 31:1–21. When questioned about his conclusions, he repeatedly conceded that he did not have any testing or analysis to show that the alleged defects would cause the effects he reported. [Dkt. 26-6 at 11:4–11; 11:21–12:2; 13:16–24; 17:12–18:4; 27:14–18; 28:6–12; 29:3–10; 31:24–32:9].

#### B. Peter Villani

Peter Villani is a former police officer currently employed as an operations officer for the United States Department of Veteran Affairs Police. [Dkt. 27-6 at 2]. He has participated in shooting competitions, worked as a range manager and firearms salesman, and taught tactical awareness and proper use of issued sidearms. *Id.* at 3–4. He has also been certified as an armorer for multiple firearms (including the Sig Sauer P320), and as a firearms instructor, pistol safety

instructor, and range safety officer. *Id.* Villani is not an engineer, nor has he ever been involved with the design or manufacture of firearms or firearm components. [Dkt. 27-7 at 10:22–11:17]. Prior to his involvement in similar P320 cases, Villani had never reviewed design schematics for any firearm. *Id.* at 11:18–21. Beyond "test firing" pistols, Villani has never done any type of firearms testing to any recognized or written standard. *Id.* at 13:14–7. He testified in a similar P320 case that he has not even read any recognized firearm testing standards. [Dkt. 27-8 at 6:14–7:2]. He also has never published any article or other publication, or given any presentation, related to firearm design or manufacture. [Dkt. 27-7 at 13:18–24]. Villani also testified that he did not rely on any publications or studies to reach his opinions. [Dkt. 27-7 at 5:2–9].

While some of Villani's work has involved dissembling and repairing guns that were not working properly, it was limited to cleaning the firearms and simple repairs like replacing broken springs. *Id.* at 16:20–19:16. He is not a gunsmith, nor has he ever taken any gunsmithing courses. *Id.* at 14:2–6. When questioned about his conclusions, he repeatedly conceded that he did not have any testing or analysis to show that the alleged defects would cause the effects he reported. *Id.* at 25:21–24; 26:10–12; 27:3–7; 30:23–31:3. Many of Villani's opinions relate to "excess material" in the gun; however, he testified that he has not measured or quantified the amount of excess material on any of those four components, nor does he have the equipment to. *Id.* at 30:4–13. Instead, he believes that he suggested to Hicks that if Hicks could measure the excess material, he should try to. *Id.* at 30:14–17. Villani's report provides: "Depending upon the condition of the individual [P320] components' status (sear/striker engagement, excess molding material, misalignment of safety lock tab, wear, etc.), any combination of these reported defect could lead to an uncommanded discharge minus a trigger pull." [Dkt. 27-5 at 12]. But he testified that other than the excess material and the "ramp" he does not know which of the factors that he identified

were present when Plaintiff's gun discharged. [Dkt. 27-7 at 32:13–21]. He also testified that if something in her purse caused the trigger to be pulled, then the "defects would be of no consequence." *Id.* at 33:5–14. Villani did not undertake any analysis of what was in her purse that may have been able to pull the trigger, however. *Id.* at 33:17–20. Indeed, other than a surgical mask, Villani does not know what items were in her purse when the gun discharged. *Id.* at 8:6–9.

Villani contends in his report that when he "began [his] examination and photography of the firearm's internal parts" he noticed several "manufacturing defects." [Dkt. 27-5]. He then recounts these supposed defects and their effects:

- 1) "The safety lock tabs positive contact surface is deformed and does not match Sig Sauer[']s drawings . . . which depicts the tab to be rectangular with squared off edges. The safety lock tab presented, showed an oval type shape with raised edges which appeared to be excess material from the stamping process that was not removed prior to the parts installation into the striker assembly. This raised perimeter prevents the positive contact surface from making proper contact with the striker stop (wall) of the striker should the striker fail from an uncommanded discharge." *Id.* at 5.
- 2) "There is also a raised higher edge along the bottom horizontal portion of the tab which is slightly higher in appearance than the rest of the raised edging. This portion of the tab rides along the horizontal plane of the striker body as the striker travels forward during an uncommanded discharge. Normally, the safety lock tab would be raised over the striker's horizontal plane as the safety lever located in the fire control unit (FCU), would raise it during an intentional trigger press. . . . Unlike Sig Sauers official drawings, this part, again, does not match what was installed in the firearm." *Id*.
- 3) "[T]he striker foot [has] excess molding material around the entire perimeter of the striker foot's positive contact surface which prevents 'positive' contact with the sear face. When actually engaged with the sear[']s 'positive contact surface', the only portion of the striker foot that makes physical contact with the sear is the lower raised portion of the excess molding material which reduces the overall contact between the two parts. Since both the sear and striker foot show excess molding material along the perimeter of both parts of their 'positive contact' areas, it is unlikely that there was ever positive contact as designed between the two parts which can contribute to an uncommanded discharge." *Id.* at 6.

- 4) "Also, the top portion of the sear face . . . also shows a deformity as the top horizontal edge of the sear is not straight and also shows excess molding material along its horizontal edge. The sear also shows signs of physical offset of the striker foot to the left of the sear due to the striker not being vertically centered to the sear as there is a discoloration caused by discharge blowby during recoil. This offset has been observed in previous P-320's that I have examined. Also not having the striker foot vertically centered to the sear causes the sear springs to be unevenly compressed causing the sear to be at an angle to the striker foot allowing it to walk off easier." *Id.* at 7.
- 5) "[A] small piece of slivered brass . . . was caught in the inner bottom corner of the stop. This piece of brass could interfere with the operation of the safety lock tab as it is in between the safety lock tab and striker stop." *Id.* at 8. "[T]he brass obstruction could move, preventing the safety lock tab from properly engaging the striker stop and contributing to an uncommanded discharge if the striker foot had slipped off of the sear face." *Id.* at 9.
- 6) "[A] 'ramping' transition from an angled portion of the horizontal striker body on the right side to a straight portion of the horizontal striker body which can also cause the safety lock tab to 'jump' up and over the striker stop during an uncommanded discharge. This angled ramp along with the foreign obstruction (brass) can contribute to the safety lock tab failure." *Id.* at 10.

## C. Neither expert's testimony is reliable.

While the Court has doubts about both experts' relevant qualifications, it need not decide whether they are qualified. Even if the experts are qualified, their testimonies are not reliable, and therefore are not admissible. Indeed, this is the same decision reached by most of the courts that have considered their testimonies in similar cases. See Mayes v. Sig Sauer, Inc., No. 1:19-CV-00146-GNS-HBB, 2023 WL 2730264, at \*7 (W.D. Ky. Mar. 30, 2023) (addressing and excluding Hicks and Villani); Frankenberry v. Sig Sauer, Inc., 4:19-CV-02990-JD, [Dkt. 79 at 10] (D.S.C. Feb. 4, 2022) (addressing and excluding Villani); Jinn v. Sig Sauer, Inc., No., 1:20-CV-01122-

<sup>&</sup>lt;sup>2</sup> Only one court has ruled otherwise. *See Guay v. Sig Sauer, Inc.*, 610 F. Supp. 3d 423 (D.N.H. 2022). The *Guay* court admitted Hicks' testimony entirely, *id.* at 433, but concluded that Villani was only qualified to testify to some of his opinions. *Id.* at 429–32. Other than opining that testing is not necessary, the *Guay* court did not address the *Daubert* reliability factors, however. A jury in *Guay* ultimately returned a verdict in favor of Sig Sauer. *Guay v. Sig Sauer, Inc.*, No. 1:20-cv-00736-LM, [Dkt. 109], (D.N.H. Sept. 9, 2022).

PGG-RWL, *Report and Recommendation of Magistrate Judge* [Dkt. 75 at 17, 33] (S.D.N.Y. Apr. 12, 2023) (addressing and recommending excluding Hicks and Villani).<sup>3</sup> Because Plaintiff makes essentially the same reliability arguments for both experts in response to Sig Sauer's motions, the Court analyzes the experts together.

Not a single *Daubert* reliability factor favors admitting Hicks' or Villani's testimony. As previously discussed, neither expert has completed any testing to prove that the alleged defects could cause the pistol to fire without a trigger pull. As to Villani, Plaintiff attempts to discredit this deficiency by disingenuously claiming that "Villani testified that the failure has been replicated in real life many times." [Dkt. 38 at 28]. Her claim references Villani's testimony regarding one separate incident where a P320 allegedly discharged without a trigger pull. After watching the video, Villani supposedly testified that he "[had] no question that [the individual depicted] did not pull the trigger. His finger was off of the trigger, and the gun was in his holster." Id. at 29.4 As to Hicks, Plaintiff similarly argues that "[c]ommon sense" prohibits requiring an expert "to risk his or her life to replicate an event that has already been replicated in real life many times over the last six years." [Dkt. 38 at 21]. Plaintiff then recounts several allegations of unintended discharges in lieu of Hicks completing his own testing. [Dkt. 38 at 21–24]. Plaintiff's argument seems to be that a functioning gun does not discharge without a trigger pull, and because numerous P320s have allegedly discharged without a trigger pull, her experts must be right that her gun is defective. This argument neglects that the Court's focus is the experts' methodologies, not their conclusions. See Daubert, 509 U.S. 595. "To be sure, it is not required that the experts conduct a litany of tests on

<sup>&</sup>lt;sup>3</sup> As of the date of this Order, the United States District Judge presiding over *Jinn v. Sig Sauer, Inc.* in the Southern District of New York has not entered an order adopting or rejecting the abovementioned Report and Recommendation of Magistrate Judge.

<sup>&</sup>lt;sup>4</sup> The Court could not locate this testimony in the exhibit that Plaintiff cited. See [Dkt. 38-17].

[Plaintiff's] specific pistol, but rather, they must demonstrate that their theories have some empirical evidence to support the assertion that the alleged defects have been found to cause uncommanded discharges." *Mayes*, 2023 WL 2730264, at \*8.

Second, the experts' theories have not been subjected to peer review or publication. Both experts testified that they have not published any work involving firearm manufacture or design, nor did they rely on any publications to reach their respective opinions. Plaintiff argues that "[t]here is no peer reviewed literature on the P320's defect as it is a relatively new design." [Dkt. 38 at 29]. As with the testing, a publication need not be on the P320 specifically to demonstrate that the experts' theories are supported by some empirical evidence. *See Mayes*, 2023 WL 2730264, at \*8. The experts do not even point to any literature to demonstrate that their opinions are based on new applications of existing theories. To the Court's knowledge, Hicks' and Villani's opinions are based on wholly novel theories that they expect the Court to simply take their word for.

Third, neither expert identifies a known error rate for their respective methodology. And finally—as already alluded to in analyzing the previous factors—they have not demonstrated that there is a general acceptance of their respective theories in the engineering community. Plaintiff contends that their conclusions that the pistol can fire without a trigger pull "is not a novel or unreliable opinion given that Sig Sauer's own August 4, 2017 press release on the P320 stated that vibration could make the original gun's safety mechanism fail." [Dkt. 38 at 4] (citing [Dkt. 38-5 at 1]). The press release she references provides:

All SIG SAUER pistols incorporate effective mechanical safeties to ensure they only fire when the trigger is pressed. However, like any mechanical device, exposure to acute conditions (e.g. shock, vibration, heavy or repeated drops) may have a negative effect on these safety mechanisms and cause them to not work as designed. This language is common to owner's manuals of major handgun manufacturers.

[Dkt. 38-5 at 1]. Plaintiff again neglects, however, that when evaluating a *Daubert* challenge, a court's focus "must be solely on [the expert's] principles and methodology, not on the conclusions that they generate." *Daubert*, 509 U.S. at 595. This generic disclaimer does not provide an objective, independent validation of the experts' methodologies. *See Brown*, 705 F.3d at 536.

Even though none of the *Daubert* factors favors admitting the experts' testimonies, Plaintiff instructs the Court: "So long as an expert's scientific testimony rests on 'good grounds based on what is known' it should be tested by the adversarial process, rather than excluded for fear that jurors will not be able to handle the scientific complexities." [Dkt. 38 at 29] (quoting *Daubert*, 509 U.S. at 590) (internal citations omitted). But while Plaintiff asserts that their testimony "rests on good grounds based on what is known," the only basis she provides for that assertion is their subjective opinions. Additionally, the Court held a hearing on Sig Sauer's *Daubert* motions, but Plaintiff did not have Villani or Hicks attend. [Dkt. 48]. Therefore, Plaintiff forfeited the opportunity to have her experts potentially remediate these deficiencies. The Court must exclude expert testimony that is not reliable. *See* Fed. R. Evid. 702. Because the Court is not aware of any objective, independent validation of the methodologies used by Timothy Hicks or Peter Villani, it must grant Sig Sauer's motions to exclude their testimonies and opinions. [Dkts. 26, 27]

#### III. MOTION FOR SUMMARY JUDGMENT

In its Motion Summary Judgment, Sig Sauer contends that if the Court excludes Hicks' and Villani's testimonies, it should also dismiss Plaintiff's case because she cannot proceed on any of her claims without expert testimony. [Dkt. 28 at 2]. The Court agrees.

## A. Legal Standard

Under Federal Rule of Civil Procedure 56, "[s]ummary judgment is proper when the pleadings and evidence demonstrate that no genuine issue of material fact exists, and the movant is entitled to judgment as a matter of law." *DIRECTV, Inc. v. Robson*, 420 F.3d 532, 536 (5th Cir. 2005) (internal citations omitted); Fed. R. Civ. P. 56(c). An issue is material if its resolution could affect the outcome of the action. *DIRECTV*, 420 F.3d at 536. A dispute as to a material fact is genuine if the evidence is such that a reasonable jury could return a verdict for the nonmoving party. *Id.* All reasonable inferences must be drawn in favor of the nonmoving party. *Smith v. Amedisys, Inc.*, 298 F.3d 434, 440 (5th Cir. 2002). There is no genuine issue of material fact if, when the evidence is viewed in the light most favorable to the nonmoving party, no reasonable trier of fact could find for the nonmoving party. *Int'l Shortstop, Inc. v. Rally's, Inc.*, 939 F.2d 1257, 1263–64 (5th Cir. 1991) (citations omitted).

Where the dispositive issue is one which the nonmoving party will bear the burden of persuasion at trial, the moving party may satisfy its burden of production by either (1) submitting affirmative evidence that negates an essential element of the nonmovant's claim, or (2) demonstrating that there is no evidence in the record to establish an essential element of the nonmovant's claim. *St. Amant v. Benoit*, 806 F.2d 1294, 1297 (5th Cir. 1987) (internal citations omitted).

If, under the first option, the nonmoving party cannot point to evidence sufficient to dispute the movant's contention that there are no disputed facts, the moving party is entitled to summary judgment as a matter of law. First Nat'l Bank of Ariz. v. Cities Serv. Co., 391 U.S. 253, 288–89 (1980); Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 249–50 (1986). Under the second option, the nonmoving party may defeat the motion by pointing to "supporting evidence already in the

record that was overlooked or ignored by the moving party." *Celotex Corp. v. Catrett*, 477 U.S. 317, 332–33 (1986) (Brennan, J., dissenting). "Conclusory allegations unsupported by concrete and particular facts will not prevent an award of summary judgment." *Duffy v. Leading Edge Prods.*, 44 F.3d 308, 312 (5th Cir. 1995).

If the nonmoving party can meet its burden under either of these scenarios, the burden shifts back to the movant to demonstrate the nonmovant's inadequacies. *Id.* If the movant meets this burden, "the burden of production shifts [back] to the nonmoving party, who must either (1) rehabilitate the evidence attacked in the moving party's papers, (2) produce additional evidence showing the existence of a genuine issue for trial as provided in Rule 56(e), or (3) submit an affidavit explaining why further discovery is necessary as provided in Rule 56(f)." *Celotex*, 477 U.S. at 333 n.3. "Summary judgment should be granted if the nonmoving party fails to respond in one or more of these ways, or if, after the nonmoving party responds, the court determines that the moving party has met its ultimate burden of persuading the court that there is no genuine issue of material fact for trial." *Parekh v. Argonautica Shipping Invests. B.V.*, No. CV 16-13731, 2018 WL 295498, at \*3 (E.D. La. Jan. 4, 2018) (quoting *Celotex*, 477 U.S. at 333 n.3).

## **B.** Discussion

"In Texas, a plaintiff can predicate a products liability action on one or more of at least three theories of recovery: (1) strict liability under [Restatement (Second) of Torts] § 402A, (2) breach of warranty under the U.C.C., and (3) negligence." *Syrie v. Knoll Intern.*, 748 F.2d 304, 306 (5th Cir. 1984); *see also* Tex. Civ. Prac. & Rem. Code Ann. § 82.001(2) (defining "products liability action" as "any action against a manufacturer or seller for recovery of damages arising out of personal injury, death, or property damage allegedly caused by a defective product whether the action is based in strict tort liability, strict products liability, negligence, misrepresentation, breach

of express or implied warranty, or any other theory or combination of theories"). Here, Plaintiff seeks to recover under all three theories.

To prevail on a strict products liability action, a plaintiff must establish that: "(1) a product is defective; (2) the defect rendered the product unreasonably dangerous; (3) the product reached the consumer without substantial change in its condition from the time of original sale; and (4) the defective product was the producing cause of the injury to the user." *Syrie*, 748 F.2d at 306. "A product may be proven to be defective if it is unreasonably dangerous in construction, or it is unreasonably dangerous as designed, or it is unreasonably dangerous because adequate warnings or instructions are not provided." *Lucas v. Tex. Indus., Inc.*, 696 S.W.2d 372, 376 (Tex. 1984).

For a products liability claim premised on negligence, a plaintiff must demonstrate: "(1) that the manufacturer owed a duty to the plaintiff; (2) that the manufacturer breached that duty; (3) that the plaintiff was injured; and (4) that the manufacturer's breach of the duty was the proximate cause of the plaintiff's injury or damages." *McLennan v. Am. Eurocopter Corp., Inc.*, 245 F.3d 403, 431 (5th Cir. 2001). A strict liability claim "focuses upon the product itself, and requires a showing that the manufacturer placed a product into the stream of commerce that was unreasonably dangerous for a foreseeable use," while a negligence claim "focuses upon the conduct of the manufacturer in placing that product into the stream of commerce, and requires a determination of whether that conduct complies with the applicable standard of care." *Id.* 

"[A]lthough a negligence claim requires a different showing from a strict liability claim, a manufacturer logically cannot be held liable for failing to exercise ordinary care when producing a product that is not defective." *Garrett v. Hamilton Standard Controls, Inc.*, 850 F.2d 253, 257 (5th Cir. 1988). This is because: "(1) if a product is not unreasonably dangerous because of the way it was manufactured, it was not negligent to manufacture it that way and (2) even if the

manufacturer was somehow negligent in the design or production of the product, that negligence cannot have caused the plaintiff's injury because the negligence did not render the product 'unreasonably dangerous.'" *Id.* Accordingly, if Plaintiff's strict liability claim fails because she cannot establish that the firearm was defective, then her negligence claims necessarily fail too.<sup>5</sup>

Similarly, if a plaintiff's strict liability claim must be dismissed, so too must their implied warranty of merchantability claim, when the two claims are premised on the same alleged defect. Smith v. Chrysler Grp., L.L.C., 909 F.3d 744, 752 (5th Cir. 2018) (citing Hyundai Motor Co. v. Rodriguez ex rel. Rodriguez, 995 S.W.2d 661, 665 (Tex. 1999)). "[A] seller of goods impliedly warrants that they 'are fit for the ordinary purposes for which such goods are used." Gen. Motors Corp. v. Brewer, 966 S.W.2d 56, 57 (Tex. 1998) (quoting Tex. Bus. & Com. Code Ann. § 2.314(b)(3)). "For goods to breach this warranty, they must be defective—that is, they must be 'unfit for the ordinary purposes for which they are used because of a lack of something necessary for adequacy." Id. (quoting Plas-Tex, Inc. v. U.S. Steel Corp., 772 S.W.2d 442, 443-444 (Tex. 1989)). Indeed, this a different definition of "defective" than is used for a strict products liability claim, which focuses on whether a product is "unusually dangerous." See Lucas, 696 S.W.2d at 376. Thus, a product may breach the implied warranty of merchantability without giving rise to a strict liability claim if it is unfit for its ordinary purpose but is not unusually dangerous. But where, as here, the breach of the implied warranty claim is premised on the same defect as the strict liability claim, the failure to establish a defect for purposes of the strict liability claim also kills the implied warranty claim.

<sup>&</sup>lt;sup>5</sup> Plaintiff alleges that Sig Sauer was negligent in designing and manufacturing the firearm, as well as in "failing to unambiguously warn purchasers and end users of the gun... of said defective, hazardous and unreasonably dangerous conditions relating to its design and manufacture." [Dkt. 1 at 32]. While some negligent failure to warn claims may not be encompassed by a strict products liability claim, *see Garrett*, 850 F.2d at 257 & n.8, that is not the case here. Plaintiff's negligent failure to warn claim is premised on the firearm discharging without a trigger pull because of a defect. Therefore, if she fails to prove that defect, the failure to warn claim fails.

The Court therefore first addresses whether Plaintiff can prevail on her strict liability claim. If she cannot establish that a defect caused the gun to discharge without a trigger pull, the Court need not engage in a negligence or breach of implied warranty of merchantability analysis.

"Expert testimony is required when an issue involves matters beyond jurors' common understanding." *Mack Trucks, Inc. v, Tamez*, 206 S.W.3d 572, 583 (Tex. 2006). "Proof other than expert testimony will constitute some evidence of causation only when a layperson's general experience and common understanding would enable the layperson to determine from the evidence, with reasonable probability, the causal relationship between the event and the condition." *Id.* In defective products cases, the Supreme Court of Texas has "consistently required competent expert testimony and objective proof that a defect caused the condition complained." *Id.* (citing *Nissan Motors Co. Ltd. v. Armstrong*, 145 S.W.3d 131, 137 (Tex. 2004) (holding that "[a] lay juror's general experience and common knowledge do not extend to whether design defects such as those alleged in this case caused releases of diesel fuel during a rollover accident"); *see also Ford Motor Co. v. Ledesma*, 242 S.W.3d 32, 42–43 (Tex. 2007) ("If juries were generally free to infer a product defect and injury causation from an accident or product failure alone, without any proof of the specific deviation from design that caused the accident, expert testimony would hardly seem essential. Yet we have repeatedly said otherwise.").

Determining whether a defect in Plaintiff's P320 enabled it to discharge without a trigger pull, thereby causing her injuries, requires technical knowledge beyond jurors' general experience and common understanding. *See Mack Trucks*, 206 S.W.3d at 583. Therefore, expert testimony on causation is required to show that Plaintiff is entitled to recover under any of the products liability theories.

Plaintiff's response to Sig Sauer's Motion for Summary Judgment directs the Court's attention to other similar incidents involving P320s that allegedly discharged without trigger pulls. These other incidents cannot establish that a defect caused her gun to discharge, however. Analogous cases involving cars that allegedly accelerated without the driver pressing the gas pedal demonstrate why. See, e.g., Nissan Motors Co. v. Armstrong, 145 S.W.3d 131 (Tex. 2004). "In all of these cases, it was not enough that a vehicle accelerated when claimants swore they had done nothing. Instead, [the Supreme Court of Texas] [has] consistently required competent expert testimony and objective proof that a defect caused the acceleration." Id. (citing Gammill v. Jack Williams Chevrolet, Inc., 972 S.W.2d 713, 715, 717, 719 (Tex. 1998); Gen. Motors Corp. v. Hopkins, 548 S.W.2d 344, 346–47 (Tex. 1977), overruled on other grounds by Turner v. Gen. Motors Corp., 584 S.W.2d 844 (Tex. 1979) and Duncan v. Cessna Aircraft Co., 665 S.W.2d 414 (Tex. 1984); Henderson v. Ford Motor Co., 519 S.W.2d 87, 88–89, 93–94 (Tex. 1974), overruled on other grounds by Duncan, 665 S.W.2d 414).

In *Nissan Motors*, the Supreme Court of Texas reversed a jury verdict that found that a defect caused the plaintiff's car to unintentionally accelerate. 145 S.W.3d at 134. To prove that her car had a defect, the plaintiff's case at trial centered on the quantity of other alleged incidents of unintended accelerations. *Id.* at 144–48. The trial court erred by allowing such evidence because "[p]roof of unintended acceleration is *not* proof of a defect." *Id.* at 148. And "proof of *many* instances of unintended acceleration cannot prove a defect either; a lot of no evidence is still no evidence." *Id.* "[P]roduct defects must be proved; they cannot simply be inferred from a large number of complaints. If the rule were otherwise, product claims would become a self-fulfilling prophecy—the more that are made, the more likely all must be true." *Id.* at 142. While the court acknowledged that other similar incidents may be admissible for certain purposes, it concluded:

[W]e have never held that mere claims of previous accidents can prove a product is defective, and we decline to do so here. A number of complaints may require a prudent manufacturer to investigate, and may presage liability if those complaints are substantiated and the manufacturer does nothing. But a large number of complaints cannot alone raise a fact question that a defect exists.

*Id.* at 140.

Likewise, here, proof of an unintended discharge is not proof of a defect. Nor is proof of many unintended discharges. Under Texas law, no reasonable jury could conclude that a defect caused Plaintiff's gun to discharge without a trigger pull solely from (1) lay testimony that her gun discharged without a trigger pull and (2) the existence of other similar alleged incidents. Qualified and reliable expert testimony on causation is necessary. With Hicks and Villani excluded from testifying, Plaintiff has failed to raise a fact question that a defect exists. Because Plaintiff's claims are all predicated on this same defect, Sig Sauer is entitled to summary judgment on all of Plaintiff's claims. See Garrett, 850 F.2d at 257; Smith, 909 F.3d at 752.

### IV. CONCLUSION

It is therefore **ORDERED** that Defendant Sig Sauer, Inc.'s Rule 702 Motion to Exclude Evidence and Opinions of Plaintiff's Expert, Timothy Hicks [Dkt. 26], Rule 702 Motion to Exclude Evidence and Opinions of Plaintiff's Expert, Peter Villani [Dkt. 27], and Motion for Summary Judgment [Dkt. 28] are **GRANTED**.

<sup>&</sup>lt;sup>6</sup> Plaintiff points out in her response to Sig Sauer's Motion for Summary Judgment that she designated a third expert, Jonathyn Priest, and that Sig Sauer did not move to exclude his testimony. [Dkt. 35 at 1 n.1]. Priest's expert report does not address or identify any defects that caused or could have caused Plaintiff's gun to discharge without a trigger pull, however. *See generally* [Dkt. 35-1]. Therefore, his report does not cure this deficiency in Plaintiff's proffered evidence.

It is further **ORDERED** that Plaintiff Brittany Hilton's claims are **DISMISSED WITH PREJUDICE**. The Court will enter a Final Judgment in accordance with this Order.

SIGNED this 8th day of June, 2023.

Michael J. Truncale

United States District Judge

# Tom Taylor Declaration Ex. M



24 March 2023

Champe Barton Tom Jackman The Washington Post/The Trace 1301 K Street, NW Washington, D.C. 20071



RE: SIG SAUER Response to Inquiry re P320

Thank you for reaching out regarding your upcoming story about the SIG SAUER P320, and the baseless accusations and litigations that have been levied against this firearm. Given the relatively short time period provided to respond, we are unable to correct all the misstatements of fact as these comments will be necessarily brief.

With over two million produced to date, the P320 is one of the most widely carried firearms in the world today. The SIG SAUER P320 model pistol is among the most tested, proven, and successful handguns in small arms history. It has endured extremely rigorous testing to become the official sidearm of all branches of the U.S. military, the Department of Homeland Security, and military and law enforcement agencies worldwide. It conforms to standards of the National Institute of Justice (NIJ), the Small Arms and Ammunition Manufacturers' Institute (SAAMI), and other federal/state agencies.

During testing outside of industry standards, it was determined that the P320 was vulnerable to discharge when dropped from certain heights and angles. SIG SAUER implemented a Voluntary Upgrade Program (VUP) which provided customers the opportunity to enhance the resilience of their firearm to drop fires free of charge. It is important to note that the VUP was not prompted by any particular claim and is entirely unrelated to any allegation that the P320 can discharge without a trigger pull, or other claims of unintentional discharges.

For almost 6 years, plaintiffs' attorneys have pursued the P320 pistol alleging it is "unsafe" or "defective", oftentimes improperly claiming that a defect exists in the firearm that was not resolved by the VUP. Originally, they complained that the P320 was susceptible to discharge without the trigger being pulled. This theory relied on a gross misrepresentation of the P320's internal components and engineering, and it ignored the basic laws of physics. Not surprisingly, despite years of litigation and extensive discovery, no one, including plaintiffs' "experts", have ever been able to replicate a P320 discharging without a trigger pull. The suggestion that "slight shifts" of small components in the P320 could result in a discharge without a trigger pull is simply not credible given the extensive and rigorous testing conducted by SIG SAUER, the U.S. military and federal law enforcement agencies, and other military and law enforcement agencies around the world. In fact, the Plaintiffs' expert referenced by the Washington Post/Trace now admits that such an occurrence cannot happen. Furthermore, a unanimous jury in the Guay case also referenced by the Washington Post/Trace reached the same conclusion after being presented the evidence in a full trial.



Because this initial theory was unsuccessful, plaintiffs' attorneys have shifted theories and now allege that the P320 must include an external safety device such as a tabbed trigger or manual safety. However, this new theory: (1) ignores that many users, including a large number of law enforcement agencies, choose firearms without external safety devices based on their philosophy of use, and SIG SAUER supports these customers by making the P320 available both with or without a manual thumb safety; (2) fails to recognize that tabbed triggers are intended to prevent drop fires, not unintentional trigger pulls: and (3) ignores fundamental rules of firearms safety, which, if adhered to, would have prevented the incidents cited in their complaints.

Lacking evidence that these incidents are the fault of the firearm, Plaintiffs' attorneys are reduced to pointing to the number of alleged unintentional P320 discharges in an attempt to give credibility to their argument. But such incidents are not unique to the P320. Numerous other manufacturers have had similar incidents of discharges occur as a result of accidental trigger pulls, even where the pistol had a tab trigger or manual safety.

In 1998 The Washington Post itself published an investigative report that the D.C. Metropolitan Police Department alone had experienced over 120 discharges in roughly a 10-year period while using a pistol made by another manufacturer, equipped with one of the very external safety features that plaintiffs' attorneys say would prevent unintentional discharges. Similarly, The Trace has reported on accidental firearm discharges, finding that there were at least 92 at businesses in 2016, and 99 in 2017 (through September 11th of that year). These discharges involved a variety of different firearm makes and models, many of which also incorporate the external safety features plaintiffs' attorneys claim the P320 should incorporate to prevent unintentional discharges.

These reports, among others, support three conclusions: (1) unintentional discharges are not uncommon amongst both law enforcement and civilians, (2) improper or unsafe handling is one of the most common causes of unintentional discharges, and (3) unintentional discharges occur with several types of firearms and are not unique to the P320. Independent investigations into reports of P320 unintentional discharges demonstrate evidence of improper or unsafe handling and confirm that these incidents could have been prevented if fundamental rules of firearms safety were followed.

The P320 pistol is used effectively and safely every day, by both civilians and armed professionals. The U.S. Army procurement office recently hailed the P320-based M17/M18 as the "safest, most reliable, most accurate handgun ever procured by the U.S. Military." It incorporates internal safety features to ensure that the firearm cannot be discharged unless the trigger is pulled, and further incorporates a safe takedown system that is specifically designed to prevent unintentional discharges during disassembly (a vulnerability common to other striker-fired designs that require the trigger to be pulled in order to disassemble). Customers also have the option of choosing a P320 equipped with a manual safety. SIG SAUER is confident in the design of the P320, and the ability of all consumers to use the P320 safely when fundamental rules of firearms safety are followed.

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# Tom Taylor Declaration Ex. N

#### Message

From: Samantha Piatt [/O=SIGSAUERORG/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SAMANTHA PIATTC1C]

Sent: 3/30/2023 4:46:10 PM

To: 'Champe Barton' [cbarton@thetrace.org]; 'Tom Jackman' [tom.jackman@washpost.com]

Subject: RE: SIG SAUER Reply to Washington Post Attachments: 03\_30\_2023\_Sig\_Sauer\_to\_Wash\_Post.pdf

Good Afternoon,

Please see attached for the response to your follow-up(s). Please confirm receipt.

Regards,

## Samantha Piatt

Director – Communications & Media Relations samantha.piatt@sigsauer.com
D: +1 (603) 610-3304
M: +1 (603) 860-6422



EXHIBIT | G

From: Champe Barton <cbarton@thetrace.org> Sent: Thursday, March 30, 2023 1:13 PM

To: Tom Jackman <tom.jackman@washpost.com>
Cc: Samantha Piatt <Samantha.Piatt@sigsauer.com>
Subject: Re: SIG SAUER Reply to Washington Post

[External Message]

Hi Ms. Piatt,

Following up with two additional notes:

In the past week, we spoke to Bill Lewinski, an expert in accidental shootings and executive director of the Force Science Institute. He said, regarding reports of injuries with the P320: "The number and frequency of injuries are strongly suggestive of a design flaw versus a human performance error. What we're seeing is highly unusual."

Also, we wanted to know how many cases involving reports of unintended discharges with the P320 SIG Sauer has settled. Could you provide some clarity on that number as well?

Thank you, Champe

Champe Barton Reporter | <u>The Trace</u> (929) 269-4462

On Mar 28, 2023, at 12:00 PM, Jackman, Tom <tom.jackman@washpost.com> wrote:

CONFIDENTIAL SIG-GLASSCOCK00000257

Hi Ms. Piatt - Thanks for getting back to us. In your previous response, we noted that you did not answer the following question: "Can P320 handguns produced after August 8, 2017, fire if they are dropped, slammed, or jostled?"

We think it's important that SIG address this central issue: Is the P320 capable of firing without a trigger pull?

Our deadline is Thursday evening at 5 pm. Thank you.

TJ

Tom Jackman
The Washington Post
1301 K St. NW
Washington, DC 20071
202-334-4395 (desk)
202-302-3707 (cell)

Twitter: @TomJackmanWP

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From: Samantha Piatt < Samantha. Piatt@sigsauer.com>

Sent: Tuesday, March 28, 2023 1:58 PM

To: Jackman, Tom < tom.jackman@washpost.com>

Cc: cbarton@thetrace.org

Subject: Re: SIG SAUER Reply to Washington Post

Hi Tom,

I appreciate you circling back on this, what's your deadline? I will have a response back to you.

Best, Samantha

On Mar 27, 2023, at 11:19 AM, Jackman, Tom < tom.jackman@washpost.com > wrote:

#### [External Message]

Hello Ms. Piatt – Thanks for your response. Can you clarify what "misstatements of fact" appeared in our questions? We are determined to be as fair and accurate as possible, and do not want to publish anything which is incorrect in any way.

In reporting this story, we were particularly intrigued by the numerous videos which seem to show members of law enforcement being shot by a P320 without having their hands near the trigger. These are not untrained civilians who are unfamiliar with firearms safety. Can you address the videos of the officers being wounded in places such as Milwaukee, Honesdale, Pa., Somerville, Mass., and Roscommon, Mich., in which the officers' hands do not appear to be anywhere near their sidearm?

You say that unintentional discharges are common amongst both law enforcement and civilians. Do you have any data to support that statement?

You mention "independent investigations" into P320 discharges which demonstrate improper or unsafe handling. Can you share these?

Can you document your claim that the U.S. Army hailed the P320 M17/18 as the "safest, most reliable, most accurate handgun ever procured by the U.S. Military"?

 You write that the Plaintiffs' expert referenced by the Washington Post/Trace now admits that "slight shifts" in internal components cannot cause the gun to discharge without a trigger pull. Are you referring to James Tertin? If so, the excerpt shared in our questions reads that Tertin's conclusion is that the internal safeties in the gun are easy to disable, rendering the P320 unacceptably vulnerable to accidental discharges in instances where the trigger is partially or fully actuated, even by foreign objects. Is this an inaccurate rendering of Tertin's position?

Thanks.

TJ

Tom Jackman The Washington Post 1301 K St. NW Washington, DC 20071 202-334-4395 (desk) 202-302-3707 (cell)

Twitter: @TomJackmanWP

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From: Samantha Piatt < Samantha. Piatt@sigsauer.com>

Sent: Friday, March 24, 2023 9:14 AM

To: Jackman, Tom <tom.jackman@washpost.com> Cc: 'cbarton@thetrace.org' <cbarton@thetrace.org> Subject: SIG SAUER Reply to Washington Post

#### **CAUTION: EXTERNAL SENDER**

Mr. Jackman + Barton,

See attached reply to your inquiry. Please kindly confirm receipt of our reply.

Best,

## Samantha Piatt

Director - Communications & Media Relations samantha.piatt@sigsauer.com D: +1 (603) 610-3304 M: +1 (603) 860-6422 <image001.jpg>

Filed 08/08/25

# Tom Taylor Declaration Ex. O

30 March 2023



Champe Barton Tom Jackman The Washington Post/The Trace 1301 K Street, NW Washington, D.C. 20071

RE: SIG SAUER Further Response to Inquiry re P320

Following receipt of SIG SAUER's response to your initial inquiry, you requested clarification on a number of points contained therein. Please see the statement below in response.

Q: Can you clarify what "misstatements of fact" appeared in our questions?

## Answer:

- 1. You imply that the Voluntary Upgrade Program (VUP) was a direct response to the *Sheperis* case when it was not. The VUP was designed to enhance the drop safety of the P320 once it was discovered there was a drop vulnerability that was not revealed during industry standard testing.
- 2. You state that neither SAAMI nor NIJ require "specific" safety mechanisms, however this mischaracterizes the requirements imposed by these organizations' testing standards, as they functionally cannot be met without some form of safety mechanism. This is particularly relevant when focusing on tabbed triggers, which are safety devices utilized by other companies to allow their pistols to satisfy industry drop test requirements. The design of the P320 incorporates internal safeties which allow it to meet the drop test requirements of SAAMI and NIJ without a tabbed trigger.
- 3. The statement that the judge in the *Guay* case called Mr. Guay "credible in every respect" is very misleading. In her opinion, the Judge did not address any of the engineering evidence in the case, including the damage to the holster which confirmed that the pistol was out of the holster when it fired not fully holstered as Mr. Guay claimed and the inability of the plaintiff or his experts to put forth a credible theory of how a P320 can fire without a trigger pull. When presented this exact same evidence, a jury of 12 rendered a unanimous verdict in SIG SAUER's favor.

These are only examples of statements included in your request which did not correctly represent the facts and were misleading.

Q: In reporting this story, we were particularly intrigued by the numerous videos which seem to show members of law enforcement being shot by a P320 without having their hands near the trigger. These are not untrained civilians who are unfamiliar with firearms safety. Can you address the videos of the officers being wounded in places such as Milwaukee, Honesdale, Pa., Somerville, Mass., and Roscommon, Mich., in which the officers' hands do not appear to be anywhere near their sidearm?

#### Answer:

Putting aside the issue of what firearms safety training any particular officer might have, in instances where a P320 was involved, some of these videos themselves indicated – or subsequent investigations concluded – that a foreign object contacted the trigger, such as a seat belt (Roscommon, Mich.), or loose

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articles or zipper tabs (Somerville, Mass), causing the discharge. In none of these cases do these videos present a clear view of the firearms' trigger at the time of discharge, in fact you cannot see the firearm at all in the Roscommon, Mich. video. Moreover, as current plaintiffs' expert James Tertin has conceded, the trigger must be pulled in order for the P320 to fire. Based upon his statement he agrees that in each of these incidents something is pulling the trigger.

It is also important to note that in contrast to your statement above, of the referenced occurrences, only the Somerville, Mass, occurrence resulted in injury to the involved officer.

Finally, videos of firearm discharges where the user's hand is not on and/or near the firearm are not unique to SIG SAUER or the P320. By way of example, below are links to two videos involving competitor firearms where such occurrences were captured:

Drawstrings can cause guns many law enforcement agencies use to fire

VIDEO Holstered Pistol Discharges Negligent or Accident

Q: You say that unintentional discharges are common amongst both law enforcement and civilians. Do you have any data to support that statement?

#### Answer:

There are several studies and data points that address unintentional discharges. The two which we referenced in our response (WaPo report on DC Metro PD discharges and Trace report on accidental discharges at businesses) were selected because having appeared in your publications we thought you would find them most credible. If you care to find more, recently the Associated Press published a similar report (2019), and others can be easily found.

Q: You mention "independent investigations" into P320 discharges which demonstrate improper or unsafe handling. Can you share these?

#### Answer:

The Pasco County Sheriff's Office and Northrop (Tampa (FL) PD) incidents are good examples of this. The findings of the Pasco County SO in relation to that incident were reported in the news (Pasco Officer Whose Gun Discharged In School Cafeteria Is Fired For Mishandling Pistol | WUSF Public Media) and the deputy involved was terminated and even referred for criminal charges. The internal investigation report from Tampa PD (obtained through a freedom of information request) found that the physical evidence was inconsistent with Ofc. Northrop's description of the incident and concluded ". . . Reserve Officer H. Northrop discharged his assigned firearm without cause. He failed to perform his duties and responsibilities in a careful and prudent manner". Additionally, the ICE armorer – who examines all ICE pistols involved in any shooting incident, which would include all of the P320 unintentional discharge claims within ICE – has testified that he does not believe that the P320 fires without a trigger pull, and he has no concerns with the safety of the P320 pistol.

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Q: Can you document your claim that the U.S. Army hailed the P320 M17/18 as the "safest, most reliable, most accurate handgun ever procured by the U.S. Military"?

#### Answer:

Please see the Instagram post from February 10, 2021, posted on the official U.S. Army PEO Soldier Instagram profile:



Q: You write that the Plaintiffs' expert referenced by the Washington Post/Trace now admits that "slight shifts" in internal components cannot cause the gun to discharge without a trigger pull. Are you referring to James Tertin? If so, the excerpt share in our questions reads that Tertin's conclusion is that the internal safeties in the gun are easy to disable, rendering the P320 unacceptably vulnerable to accidental discharges in instances where the trigger is partially or fully actuated, even by foreign objects. Is this an accurate rendering of Tertin's position?

#### Answer:

The response to the theory of "slight shifts" refers to plaintiffs' experts Peter Villani and Timothy Hicks, who gave SIG SAUER first exposure to the theory of the P320 discharging without a trigger pull. Neither

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Mr. Villani nor Mr. Hicks could ever replicate a discharge without a trigger pull, and the one jury that heard their testimony – in the *Guay* case – rejected it. Plaintiffs' expert James Tertin has rejected the claim that the P320 can discharge without a trigger pull and admitted in deposition, and under oath, that **full actuation** of the trigger is required for the P320 to fire. An excerpt of his testimony transcript is below:

- 12 Q. Right. So is the trigger going
- 13 to have to be moved -- to disengage that tier
- 14 and striker, do you have any evidence that
- 15 that can be done without the trigger being
- 16 fully actuated?
- 17 A. No.
- 18 Q. So then would you agree that, as
- 19 we sit here today, you have no scientific
- 20 basis to say that the P320 will discharge
- 21 without full actuation?
- 22 MR. HURD: Objection.
- 23 A. No.
- 24 Q. We cannot agree on that?
- 25 A. Oh, no, we can agree.

Q: Can P320 handguns produced after August 8, 2017, fire if they are dropped, slammed, or jostled? Is the P320 capable of firing without a trigger pull?

## Answer:

No one has ever been able to make the P320 fire without a trigger pull despite extensive abusive testing and nearly 6 years of litigation attacking its safety. Drop fires of pre-upgrade P320s were the result of inertial trigger pulls, a vulnerability that was addressed in the voluntary upgrade.

Today, yet another Court confirmed there is no evidence the P320 is capable of firing without the trigger being pulled. Chief Judge Greg Shivers of the Western District of Kentucky issued an order granting SIG SAUER's motion to exclude Plaintiff's experts and awarding summary judgment on Plaintiff's manufacturing and design defect claims in *Mayes v. Sig Sauer, Inc.*, Case No. 1:19-cv-00146. A copy of the Court's opinion is enclosed. This decision further discredits the notion that the P320 pistol is capable of firing without a trigger pull. Judge Shivers rejected Plaintiff's experts' opinions of defect, finding that "they are not corroborated by any physical testing or other credible support..." The Court found that Plaintiff's experts "offer no more than 'conjecture and speculation," which renders their opinions unreliable as a matter of law.

Judge Shivers agreed with Judge Joseph Dawson III, who similarly held in *Frankenberry v. Sig Sauer*, Case No. 4:19-cv-02990 (D.S.C.), that the same theories expressed in the Mayes case were unreliable and did not satisfy the requirements for the admissibility of expert testimony. Judge Dawson – like Judge Shivers – also granted SIG SAUER's motion for summary judgment dismissing plaintiffs' claims. In the

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one case where experts were allowed to testify about their opinions that the P320 fired without a trigger pull, *Guay v. Sig Sauer*, a jury of twelve unanimously rejected plaintiff's theories and found in SIG SAUER's favor. Thus, every Court who has considered the issue of whether the P320 can fire without a trigger pull has rejected the claim via motion or verdict, and that theory has been thoroughly discredited. As we previously stated, to the extent a triggerless discharge of the P320 was possible – which it is not – someone would have replicated this condition. However, nobody has because the P320 does not fire without the trigger being pulled. Plaintiffs' experts promote theories about flaws in the pistol offering only suggestion and speculation, which when exposed to the bright light of the courtroom are summarily rejected.

For further information on how the internal safeties of the P320 operate to prevent a discharge of the firearm without a trigger pull, we invite you to review a video detailing these safety features posted on our website <a href="https://example.com/here/">here</a>.

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