



November 3, 2025

Sarah F. Colbert, Esq.
General Counsel
Sturm, Ruger & Co.
1 Lacey Place
Southport, CT 06890

Dear Ms. Colbert,

On behalf of Everytown for Gun Safety Support Fund, we write with respect to an urgent matter of public safety. As Ruger is no doubt aware, certain handguns—most notably pistols made by Glock and others copying the same design—have been easily modified into machine guns that fire fully automatically with the insertion of a readily available (but illegal) machine gun conversion device. The frequency of shootings with such pocket machine guns has skyrocketed in the past several years. Instead of shunning such a design, Ruger appears to have run toward it, designing its new RXM handgun, introduced in December 2024, to mimic a Glock and to be customizable with the same aftermarket parts. As Ruger must have known, introducing such a design into the marketplace risks exacerbating the proliferation of illegal machine guns on the streets and further endangering American lives.

In recent days, reports have indicated that Glock will soon be pulling its easily modifiable pistols from the market.¹ A second company, Shadow Systems, is reportedly doing the same.² This will leave Ruger as the largest U.S. manufacturer of a pistol that appears to be easily convertible into an illegal machine gun, and risks Ruger's RXM becoming the new crime gun of choice across the country. While we are not aware of any public reports to date of modified Ruger RXMs recovered in connection with a crime, it is almost certainly only a matter of time, given the rising popularity of these conversion devices and weapons that support their use.

Ruger claims to be a “model of corporate and community responsibility.”³ For that to be more than an empty promise, and for the reasons set forth more fully below, Ruger must pull the RXM from the market unless and until it changes the pistol's design. We call on the company to do so immediately.

¹ See, e.g., Jérôme Brahy, [New Glock V Series to replace most of Glock's current pistols](#), Army Recognition Group (Oct. 24, 2025); Jake Fogleman, [Glock to Redesign Pistols as Lawsuits and Legislation Pile Up](#), The Reload (Oct. 22, 2025). Everytown has preserved copies of all internet sources referenced in this letter.

² See, e.g., [Glocks BANNED - Shadow Systems Responds!](#), at 0:44 (YouTube, Oct. 14, 2025), (where a Shadow Systems representative shares they are making design changes in response to the recent California AB1127 bill banning semiautomatic machinegun-convertible pistols); Video, Instagram, [Some Good Info For Y'all #GlockBan](#) (Oct. 24, 2025) (where a California gun retailer confirms that in response to the ban, “Shadow Systems has come out and said they are going to modify their trigger so that they can get it on roster”). Throughout this letter, certain social media usernames have been redacted for individual users' privacy.

³ [Sturm, Ruger & Co., Inc.](#) (last visited Oct. 28, 2025).



I. Pistols Easily Converted to Machine Guns Pose a Public Safety Crisis

Machine guns, or fully automatic weapons, have been outlawed for general civilian use for almost forty years—and were highly restricted long before that—because of their frequent use in crime, their role in deadly shootings and massacres, and the “immense danger” that their rapid-fire capability poses to the public.⁴ Federal law bans the sale of machine guns to the public and to any person except those specifically authorized by the Attorney General, and it also prohibits the transfer and possession of them except in limited circumstances.⁵

But the era of the civilian machine gun is back with a vengeance.⁶ This criminal renaissance came about because of pistols whose design has allowed them to be easily, illegally modified with the insertion of a simple, dime-sized conversion device called an auto sear.⁷ These devices are sometimes known as “Glock switches” because of their common use in Glock pistols, although Glock does not make them.⁸ Pistols affixed with auto sears are illegal machine guns (and indeed the switches themselves are illegal to possess under federal and many state laws),⁹ and can empty a 30-round magazine in two seconds.

In recent years, the ease with which pistols like Glocks have been modified with auto sears has gained national attention for its unique and outsized role in worsening America’s gun violence crisis.¹⁰ Nationally, from 2019 to 2023, there was a 784% increase in machine gun conversion device recoveries.¹¹ In the City of Chicago alone, from the beginning of 2021 through May 2024, more than 1,300 modified Glocks were recovered by the Chicago Police Department.¹² This was, on average, more than one modified Glock recovered every day. According to one Bureau of

⁴ *National Firearms Act*, Bureau of Alcohol, Tobacco, Firearms and Explosives (last updated Apr. 7, 2020); *United States v. O’Brien*, 560 U.S. 218, 230 (2010).

⁵ 18 U.S.C. § 922(b)(4), (o).

⁶ See Ernesto Londoño & Glenn Thrush, *Inexpensive Add-on Spawns a New Era of Machine Guns*, N.Y. Times (Aug. 12, 2023).

⁷ See *id.*; see also Bureau of Alcohol, Tobacco, Firearms and Explosives, *ATF Ruling 81-4* (1981) (determining that an auto sear qualifies as a “combination of parts designed and intended for use in converting a weapon” into a machinegun under 26 U.S.C. § 5845(b)) (last visited Feb. 7, 2025); Bureau of Alcohol, Tobacco, Firearms and Explosives, ATF Firearms & Ammunition Technology Division Technical Bulletin 17-04 (Aug. 3, 2017) (Ex. 5 to Pl.’s Opp. to Defs. Mot. to Suppr. Evidence (ECF No. 42), *United States v. Freitas*, No. 20-cr-223 (N.D. Cal. May 29, 2020)).

⁸ See Peter Yankowski, *More ‘switches’ that convert weapons into machine guns turning up in CT, police say*, CT Insider (Sep. 12, 2022).

⁹ See ATF Ruling 81-4, *supra* note 7; see also ATF Technical Bulletin 17-04, *supra* note 7.

¹⁰ See, e.g., *Letter from Representative Lizzie Fletcher et al. to Marvin Richardson*, Acting Dir., Bureau of Alcohol, Tobacco, Firearms & Explosives (Apr. 11, 2022); Londoño & Thrush, *supra* note 6; Houston Police Dep’t Museum, *Local Heroes Who Paid the Ultimate Sacrifice: Houston Police Officers Killed in the Line of Duty* 124 (June 2023); Press Release, Dep’t of Just. U.S. Att’y’s Off., Dist. of Conn., *U.S. Attorney and Federal Partners Address Gun Violence and Firearms Trafficking in Connecticut* (July 18, 2023) (highlighting the Connecticut U.S. Attorney’s Office focusing on firearms containing switches).

¹¹ Press Release, Dep’t of Just., *Justice Department Announces ATF’s Publication of Final Volume of National Firearms Commerce and Trafficking Assessment* (Jan. 8, 2025).

¹² See Diana Novak Jones, *Glock must face city of Chicago lawsuit over ease of machine gun conversion*, Reuters (Sep. 19, 2025); Press Release, City of Chicago, *Chicago Expands Glock Lawsuit, Seeks To Hold Glock’s Parent Company and Local Gun Dealers Accountable For Their Role in Endangering the City Through the Sale and Marketing of Easily Modified Glocks* (July 23, 2024).



Alcohol, Tobacco, Firearms and Explosives (ATF) agent, the use of pistols equipped with auto sears is “one of the scariest things” the agency has dealt with in decades.¹³

Given the prominence of this issue, it would be impossible for Ruger to be unaware of the national crisis of DIY machine guns. The issue has made headlines in almost every major news source in the country, including The New York Times, ABC, and Fox News.¹⁴ One CNN headline from 2022 read: “A device that can turn a semi-automatic weapon into a machine gun in moments is wreaking havoc on American streets.”¹⁵ Mass shootings using auto sears in Fresno, Sacramento, Mobile, and elsewhere drew media attention around the country.¹⁶ The ATF has sounded the alarm every year since at least 2019.¹⁷ Indeed, a former Associate Deputy Director of the ATF stated that “not since Prohibition have we seen this many machine guns being used to commit crimes.”¹⁸

Even the limited example of Connecticut—where Ruger has its corporate headquarters—shows the devastation that these devices create.¹⁹ In 2023 (the latest full year for which complete data is available), the ATF recovered and traced 31 machine gun conversion devices in Connecticut alone.²⁰ Senior law enforcement officials in Connecticut have expressed concern at the rising recovery rates.²¹ DIY machine guns made with these devices have shown up across Connecticut

¹³ Alain Stephens & Keegan Hamilton, [The Return of the Machine Gun](#), The Trace (Mar. 24, 2022).

¹⁴ See, e.g., Londoño & Thrush, *supra* note 6; David Spunt & Jake Gibson, [3D-printers turn handguns into machine guns for as little as 40 cents](#), Fox News (Sep. 13, 2024); Miya Shay, [Bodycam Video of Shootout That Killed Officer Shows Suspect Used Illegally Modified Gun, Police Say](#), ABC 7 (Oct. 12, 2021).

¹⁵ Curt Devine & Scott Glover, [A device that can turn a semi-automatic weapon into a machine gun in moments is wreaking havoc on American streets](#), CNN (Aug. 30, 2022).

¹⁶ See Bill Hutchinson, [‘I feel terrified’: Inventor of ‘Glock switch’ technology says he regrets creation](#), ABC News (June 24, 2024); [Another suspect in November mass shooting now booked in Fresno Co. Jail](#), ABC 30 (Feb. 2, 2020); Sam Stanton, [Three charged with murder in connection with Sacramento mass shooting. Here’s what we know](#), The Sacramento Bee (May 3, 2022); WKRG, [Modified Glock Used During New Year’s Eve Deadly Shooting in Downtown Mobile: Police](#), at 1:09 (YouTube, Jan. 2, 2023); see also Stephens & Hamilton, *supra* note 13.

¹⁷ See, e.g., Press Release, Dep’t of Just., [Indictment: So-called ‘Glock Switches’ Would Have Turned Pistols into Machineguns](#) (May 30, 2019); Press Release, Dep’t of Just., [Philadelphia Man Sentenced to 12 1/2 Years for Trafficking Methamphetamine and Weapons, Including ‘Ghost Guns,’ Near Schools](#) (Dec. 30, 2020); Reward Notice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Washington Field Division, [MPD Partners With ATF to Offer Additional \\$5K Reward for Information on Illegal Firearms](#) (Nov. 15, 2021); Press Release, Dep’t of Just. U.S. Att’y’s Off. Northern Dist. of Tex., [Fort Worth Manufacturer Charged in Glock Switch Case](#) (Nov. 18, 2022); Press Release, Dep’t of Just., [United States Attorney and ATF Discuss Emerging Threat of Machinegun Conversion Devices](#) (Nov. 29, 2023); Press Release, Dep’t of Just., [Justice Department Releases New Training to Focus on Detecting Machine Gun Conversion Devices](#) (Sep. 6, 2024); Dan Snyder & Casey Kuhn, [ATF officers in Philadelphia say they’re seeing more switches to make guns fully automatic: ‘Keeps me up at night’](#), CBS Philadelphia (May 15, 2025); see also Lindsay Whitehurst, [A surge of illegal homemade machine guns has helped fuel gun violence in the US](#), AP News (Mar. 9, 2024).

¹⁸ See Devine & Glover, *supra* note 15.

¹⁹ See, e.g., Matt Caron, [Glock switches turning up more and more at local shooting crime scenes](#), FOX61 (Nov. 7, 2022); see also Yankowski, *supra* note 8.

²⁰ Dep’t of Just., [Firearms Trace Data: Connecticut - 2023](#) (last reviewed Dec. 9, 2024). Mirroring the national trend over the last few years, the number of illegal machine gun conversion device recoveries in Connecticut has also dramatically increased. From 2019 to 2023, there was a 48% increase in recoveries. See Dep’t of Just., [National Firearms Commerce and Trafficking Assessment Volume 4, Part V](#), at 17 (2024).

²¹ See Yankowski, *supra* note 8; Caron, *supra* note 19; see also Eric Warner, [Police say number of gun ‘switches’ are on the rise in Connecticut](#), WSHU (Sep. 13, 2022).



in public parks, residential neighborhoods, city streets, and a hospital.²² In recent years, there have been numerous publicly reported criminal incidents in Connecticut involving handguns fitted with machine gun conversion devices, including the following:

- A 20-year-old mother and her four-month-old son were shot and killed by a man with a handgun equipped with a machine gun conversion device. Another person was also shot and injured.²³
- A man was injured and gunfire struck nearby apartment buildings in a shooting committed with two Glocks, one modified to fire as a machine gun.²⁴
- A man was shot in the back while sitting in his kitchen, collateral damage from a gang shooting using a DIY machine gun.²⁵
- In a raid, police recovered 6,363 bags of fentanyl, 1 kilogram of cocaine, 119 grams of crack cocaine, and sixteen handguns, including three modified with switches to fire automatically.²⁶

These examples came from a simple internet search, and therefore are only exemplars of the crimes actually committed involving converted machine guns. Both these crimes and the public outcry about DIY machine guns occurred before Ruger even put the RXM on the market in late 2024.

II. Ruger RXM Pistols, Like Many Glock Firearms, Appear to Be Capable of Easy Conversion to Machine Guns

Glock pistols have been easily susceptible to illegal machine-gun conversion because of the presence and accessibility of a cruciform-shaped trigger bar, which creates an unusually large surface area for an auto sear's disconnector to target.²⁷ Additionally, after slipping out the removeable backplate, nothing in these Glock pistols has shielded the trigger bar's large surface area from the back of the pistol, making it possible for an auto sear's disconnector to slide in, contact the trigger bar, and push it downward so the gun can continuously and rapidly fire with

²² See, e.g., Liz Hardaway, [Cellphone data, guns linked suspects to New Haven shooting on Hazel Street, warrant says](#), The Trumbull Times (Apr. 3, 2024); Sean Humphrey, [Man Extradited Back to Connecticut after fatal shooting of mom, infant in Hartford](#), Fox61 (Dec. 28, 2024); Jordan Nathaniel Fenster, [Dirt bike stolen at gunpoint in Trumbull, police say](#), Greenwich Time (Jan. 1, 2025); [Patient at Yale New Haven Hospital found with 'ghost gun,' police say](#), NBC Connecticut (Mar. 15, 2025).

²³ See Humphrey, *supra* note 22; see also Christine Dempsey, [Video played key role in arrest of Hartford fugitive wanted for killing woman and baby, officials say](#), Greenwich Time (Nov. 25, 2024).

²⁴ See Hardaway, *supra* note 22.

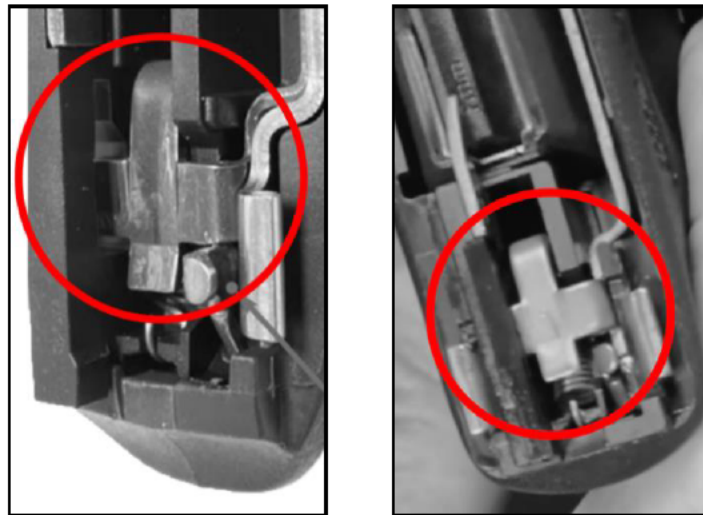
²⁵ Press Release, Dep't of Just., [Georgia Man Who Supplied Bridgeport Gang Members with Firearms Sentenced to More Than 7 Years in Prison](#) (Mar. 22, 2023).

²⁶ Christine Dempsey, [16 guns seized in raids most Hartford has confiscated in years, police say](#), CT Insider (Mar. 31, 2023).

²⁷ California recently passed a ban on semiautomatic machinegun-convertible pistols that explicitly defines a "machinegun-convertible pistol" as any semiautomatic pistol with a *cruciform trigger bar* that can be readily converted by hand or with common household tools into a machinegun." Cal. Penal Code § 16885(a); see Sam Hoyle, [California law targets gun parts that could enable automatic conversion](#), ABC Bakersfield (Oct. 20, 2025); see also Champe Barton, [Glock Could Make It Harder to Outfit Its Pistols With Switches — For a Price](#), The Trace (Sep. 4, 2024); Hutchinson, *supra* note 16.

only one pull of the trigger.²⁸ This is in sharp contrast to most other pistols, which do not accept auto sears as easily.²⁹

Ruger launched its new pistol, the RXM, as a collaboration between Ruger and Magpul Industries on December 11, 2024.³⁰ Ruger and Magpul built the RXM to mimic the Glock deliberately, and to accept virtually all Glock aftermarket accessories.³¹ Despite the grave public safety concerns of this design—concerns dating back to as early as 2017 and accelerating after 2021—Ruger chose to copy Glock’s easily accessible cruciform trigger bar.³² Assuming that public reports are accurate, the RXM is thus likewise particularly susceptible to easy illegal modification.



The cruciform trigger bars of a Ruger RXM (left) and a Glock Gen 3 Pistol (right)³³

²⁸ See, e.g., [Firearms: converter pistols: Hearing on A.B. 1127 \(Gabriel\) Before the Sen. Judiciary Comm.](#), 2025-2026 Reg. Sess. 5 (Cal. 2025) (clarifying “a machinegun-convertible pistol does *not* include a...striker-fired semiautomatic pistol *lacking* a cruciform trigger bar, which instead has a trigger bar that is shielded from interference by a pistol converter.”) (emphasis added); see also Barton, *supra* note 27; [Machinegun Conversion Devices Fact Sheet](#), Bureau of Alcohol, Tobacco, Firearms and Explosives, (last visited Oct. 28, 2025).

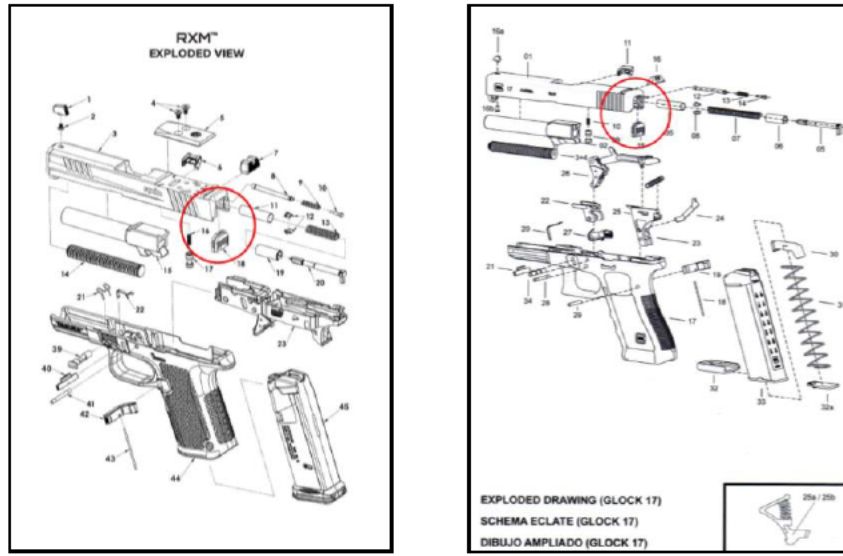
²⁹ See Hutchinson, *supra* note 16; Barton, *supra* note 27.

³⁰ See [Ruger and Magpul Announce 9mm Pistol Collaboration](#), Sturm, Ruger & Co., Inc. (Dec. 11, 2024); see also Press Release, Sturm, Ruger, & Co., Inc., [STURM, RUGER & COMPANY, INC. REPORTS 2024 DILUTED EARNINGS OF \\$1.77 PER SHARE AND DECLARES DIVIDEND OF 24¢ PER SHARE](#) (Feb. 19, 2025).

³¹ Sturm, Ruger & Co., Inc. Product Announcement, *supra* note 30; Sturm, Ruger & Co., Inc. (@rugersofficial), [What do you need to know about the new RXM™ pistol? Watch to learn more.](#), Instagram (Dec. 12, 2024).

³² See, e.g., ATF Technical Bulletin 17-04, *supra* note 7.

³³ Sturm, Ruger & Co., Inc., [RXM Centerfire Pistol Instruction Manual](#) at 29, (last visited Oct. 30, 2025); GlockStore, [Install Any Part In a NEW Gen. 3 Glock.](#), at 7:13 YouTube (Aug. 10, 2023). This and the following diagram reflect the RXM’s design in the current instruction manual on Ruger’s website.



*The removable backplates of a Ruger RXM (left) and a Glock Gen 3 Pistol (right)*³⁴

Indeed, Ruger boasts of the RXM’s similarity to Glock pistols. Ruger’s press release for the RXM states that “[m]ost major components are designed for Glock Gen 3 compatibility with off-the-shelf parts, holsters, and accessories for nearly unlimited customization.”³⁵ Ruger’s Instagram promotion of the RXM markets “ultimate flexibility to customize your firearm” and promotes “further personaliz[ing] your RXM by pairing it with a variety of aftermarket accessories.”³⁶ One of Ruger’s representatives highlighted at a trade show that since the RXM is “highly Glock 19 Gen 3 compatible. . . almost everything out there that exists in that aftermarket space fits [in] the RXM.”³⁷ In short, Ruger is capitalizing on the popularity of aftermarket Glock parts and accessories despite the nationwide crisis caused by illegal aftermarket “Glock switches.”

Ample evidence online shows that consumers have in fact been able to convert the Ruger RXM to a machine gun by inserting a conversion device. That evidence includes videos of people firing the RXM with auto sears.³⁸ Assuming that what these videos depict is accurate, the RXM is easily converted into a machine gun. For example, one retailer claimed that the RXM “came straight out the box, [they] slapped a switch on the back and it ran for 451 [rounds] . . . [as a] full auto.”³⁹ Another gun owner posted a video of themselves firing a modified RXM with the caption, “The first ruger rxm fully auto”:⁴⁰

³⁴ Sturm, Ruger & Co., Inc. RXM Centerfire Pistol Instruction Manual at 44, *supra* note 33. Glock, [Safe Action Pistols – All Models Instruction Manual](#) at 18, (last visited Oct. 31, 2025).

³⁵ Sturm, Ruger & Co., Inc. Product Announcement, *supra* note 30.

³⁶ Sturm, Ruger & Co., Inc. Instagram, *supra* note 31.

³⁷ [Ruger RXM | Shot Show 2025](#), at 1:29 (YouTube, Jan. 29, 2025).

³⁸ See, e.g., Video, Facebook, [We like the new @rugersofficial x @magpul #xm we had to throw a @trijicon #cr on it 🤪\(nerd face\). U+1F913](#), (Dec. 11, 2024); see also Facebook, [Is this the first auto sear in the ruger?](#), (Feb. 9, 2025).

³⁹ Comment by Original Poster, (Feb. 7, 2025), on [Ruger RXM meltdown / torture test. ONLY lasted 451 rounds. Glock killer what a JOKE!!](#), (YouTube, Feb. 5, 2025).

⁴⁰ [The first ruger rxm fully auto](#), YouTube (Jun. 4, 2025).



Screen captures of a video showing a Ruger RXM with an auto sear installed

Five days after the RXM’s release, one user claiming to be the Executive Director of the National Law Enforcement Firearms Instructors Association stated that he was “somewhat surprised Ruger didn’t add some kind of bump or something inside the slide to prevent a switch from being used. Especially given all the lawsuits going on.”⁴¹

The risk that Ruger’s RXM could become the new illegal machine gun of choice quickly became apparent after reports of Glock discontinuing its easily convertible models were made public. Commenters on social media stated: “Switches work just as well on a Ruger RXM . . .” and “So since the Ruger RXM shares so much parts commonality with Gen 3 Glocks on purpose, can it technically have a switch installed?”⁴² Another user noted: “Looks like the RXM is [going to] take over the market.”⁴³ On a Ruger Instagram post about the RXM, a third-party commenter wrote: “Ruger coming in hot. Just in time to scoop up all those Glock sales.”⁴⁴

⁴¹ Comment, (Dec. 16, 2024 at 11:04 AM ET), on Pistol-Forum.com, [Ruger x Magpul collab \(RXM\)... Glock 19 clone](#), (Dec. 16, 2024).

⁴² Post, [X](#), (Oct. 20, 2025 at 2:12 PM ET); Comment (Oct. 21, 2025 at 7:14 PM ET), on Reddit, [Glock rumored to be discontinuing all models except 43, 43x/48x, by Nov 30th; new “V Model” Glocks to be introduced to prevent switch conversions, as part of response to California law.](#), (Oct. 20, 2025 at 4:01 PM ET).

⁴³ Comment, (Oct 20, 2025 at 9:07 PM ET), on X, [Gen 3 Gang, how we holding up today with the news?](#), (Oct 20, 2025 at 4:30 PM ET).

⁴⁴ Comment, (Oct. 27, 2025), on Instagram, [What do you need to know about the new RXM™ pistol? Watch to learn more.](#), (Dec. 12, 2024).



III. Ruger's Continued Sale and Distribution of the RXM Pistol Exposes It to Significant Litigation Risk

As you must be aware, since 2024, the cities of Chicago, Baltimore, and Seattle, and the states of Minnesota, Maryland, and New Jersey, have each sued Glock for selling pistols that, because of their design, are easily converted to illegal machine guns.⁴⁵ Judges in three of those lawsuits so far have held that the plaintiffs have stated viable claims for relief, rejecting Glock's motions to dismiss and ruling that the lawsuits may proceed.⁴⁶ If Ruger continues on its present path, it faces similar litigation risks—especially given that Ruger put the RXM on the market years *after* the dangerousness of this design became apparent.

* * *

Ruger faces a choice following Glock's recent announcement: Will it continue to distribute and sell the RXM despite the evidence of its ease of convertibility to an illegal machine gun, or will it put public safety first? To ensure that Ruger does not exacerbate the alarming proliferation of deadly DIY machine guns across American cities and states, we urge you to take the only responsible course of action and remove the Ruger RXM from the market unless and until you change the pistol's design.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Tirschwell", written over a horizontal line.

Eric Tirschwell

Cc: The Honorable William Tong, Attorney General, State of Connecticut
Doug Smith, CEO, Magpul Industries Corp.

⁴⁵ *City of Chicago v. Glock, Inc., et al.*, No. 2024CH06875 (Cook Cnty. Cir. Ct. mot. to dismiss denied Sep. 18, 2025); *Minnesota v. Glock, Inc., et al.*, No. 27-CV-24-18827 (Minn. Dist. Ct. mot. to dismiss denied Aug. 21, 2025); *Mayor and City Council of Baltimore, et al., v. Glock, Inc., et al.*, No. C-24-CV-25-001450 (Baltimore City Cir. Ct. mot. to dismiss argued Oct. 23, 2025); *Platkin v. Glock, Inc., et al.*, No. ESX-C-000286-24 (Essex Cnty. Sup. Ct. mot. to dismiss denied Oct. 14, 2025); *Seattle v. Glock, Inc., et al.*, No. 25-2-25158-6 (King Cnty. Sup. Ct. filed Sep. 2, 2025).

⁴⁶ See Ord. Den. Mot. to Dismiss, *City of Chicago v. Glock, Inc., et al.*, No. 2024CH06875 (Cook Cnty. Cir. Ct. Sep. 18, 2025); Ord. Den. Mot. to Dismiss, *Minnesota v. Glock, Inc., et al.*, No. 27-CV-24-18827 (Minn. Dist. Ct. Aug. 21, 2025); Ord. Den. Mot. to Dismiss, *Platkin v. Glock, Inc., et al.*, No. ESX-C-000286-24 (Essex Cnty. Sup. Ct. Oct. 14, 2025).