

FILED
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KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE #: 26-2-29585-9 SEA

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON
IN AND FOR KING COUNTY

KLINE WRIGHT, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

THE RIDGE WALLET LLC d/b/a RIDGE, a
Delaware corporation,

Defendant.

NO.

CLASS ACTION COMPLAINT

I. CLASS ACTION COMPLAINT

COMES NOW the Plaintiff, Kline Wright, on individually and on behalf of all others similarly situated, by and through undersigned counsel, and for causes of action against the above-named Defendant THE RIDGE WALLET LLC d/b/a Ridge ("Defendant"), and makes the following allegations based upon information and belief, except as to allegations specifically pertaining to Plaintiff, which are based on personal knowledge.

II. NATURE OF THE ACTION

1. Defendant advertises and sells wallets, accessories, and related products through its website, ridge.com, including in the State of Washington. Defendant also sells its products through third-party retailers with locations throughout the United States, including in the State of Washington.

1 2. This class action complaint concerns Defendant's pattern and practice of sending
2 commercial emails to Washington residents that Defendant knew, or should have known,
3 contained false or misleading information in the subject lines.

4 3. For years, Defendant has used email subject lines to tout its limited-time sales,
5 inducing customers to purchase items out of fear that they might miss an unusually good deal.
6 The company uses subject lines to warn its customers of the time remaining to avail themselves
7 of the promotion. Then, after the purported end date passes, the company sends an email
8 announcing that the promotional period has been "extended." In reality, the company always
9 planned for the sale to continue during the advertised extension and therefore knew, or should
10 have known, that these subject lines were false.

11 4. This deceptive practice violates the Washington Consumer Electronic Mail Act
12 ("CEMA"), which prohibits transmission of commercial emails containing false or misleading
13 information in the subject line to Washington residents. *See* RCW 19.190.020(1)(b). And a
14 violation of CEMA's e-mail regulations is a per se violation of the Washington Consumer
15 Protection Act (CPA). *Brown v. Old Navy, LLC*, 4 Wn.3d 580, 584, 567 P.3d 38, 42 (Wash. 2025).

16 5. Plaintiff brings this action as a class action on behalf of himself and other
17 Washington residents who received Defendant's false and misleading emails. Plaintiff's requested
18 relief includes an injunction to end these practices, an award to Plaintiff and class members of
19 statutory damages for each illegal email, and an award of attorneys' fees and costs.

20 **III. PARTIES**

21 6. Plaintiff is a citizen of Washington State and resides in King County.

22 7. Defendant is a Delaware corporation with its principal place of business at 28632
23 Roadside Drive, Unit 265, Agoura Hills, CA 91301. Defendant manufactures, markets,
24 advertises, and distributes products under the Ridge brand, including on and through the Ridge
25 website (www.ridge.com), throughout the United States, including in the State of Washington.
26 Defendant is and has been engaged in substantial business activities in the State of Washington.
27

IV. JURISDICTION AND VENUE

8. This Court has subject matter jurisdiction over this civil action under, without limitation, Section 6 of Article IV of the Washington State Constitution (Superior Court jurisdiction, generally), RCW 19.86.090 (Superior Court jurisdiction over Consumer Protection Act claims), and RCW 19.190.090 (Superior Court jurisdiction over Commercial Electronic Mail Act claims).

9. This Court has personal jurisdiction over Defendant under RCW 4.28.185. This Court may exercise personal jurisdiction over Defendant as an out-of-state defendant because the claims alleged in this civil action arose from, without limitation, Defendant's transmission of commercial electronic mail messages to consumers within the State of Washington. Defendant intended, knew, or is chargeable with the knowledge that its out-of-state actions would have a consequence within Washington. In addition, Defendant transacts business within the State of Washington by selling and marketing its products to Washington consumers, including through its website, ridge.com, and through retail stores.

10. This Court also has personal jurisdiction over Defendant under RCW 19.86.160. For example, and without limitation, Defendant engaged and is continuing to engage in conduct in violation of RCW 19.86 that has had and continues to have an impact in Washington.

11. Venue is proper in King County Superior Court because, at all relevant times, Defendant has transacted business in King County, including without limitation by causing its website to be available to consumers in King County, selling products to residents of King County, and transmitting commercial electronic email messages to residents of King County. RCW 4.12.025.

V. FACTUAL ALLEGATIONS

A. Under CEMA, it is a per se violation of the CPA to initiate (or conspire to initiate) the transmission of commercial emails with false or misleading information in the subject line to Washington residents.

12. It is a violation of CEMA to "initiate the transmission, conspire with another to

1 initiate the transmission, or assist the transmission, of a commercial electronic mail message from
 2 a computer located in Washington or to an electronic mail address that the sender knows, or has
 3 reason to know, is held by a Washington resident that . . . [c]ontains false or misleading
 4 information in the subject line.” RCW 19.190.020(1)(b). As the Washington Supreme Court
 5 recently explained, “CEMA protects consumers by requiring that commercial e-mails
 6 communicate honestly about the terms of a given promotion or sale in the subject line.” *Brown*
 7 *v. Old Navy, LLC*, 567 P.3d 38, 37 (Wash. 2025).

8 **B. Defendant initiates (or conspires to initiate) the transmission of commercial emails**
 9 **with false or misleading information in the subject line to Washington residents.**

10 13. Defendant has initiated (or conspired to initiate) the transmission of commercial
 11 electronic mail messages with various types of false or misleading subject lines to Plaintiff and
 12 members of the Class.

13 14. For example, Defendant's false or misleading subject lines often describe a
 14 specific, limited-time promotion that is not, in fact, limited to the timeframe described in the
 15 subject line. They also misrepresent the end date for the promotion, tricking consumers into
 16 thinking the promotion will end sooner than it actually will. In each case, the subject line conveys
 17 an objective statement of fact that Defendant knows, or should know, is false or misleading and
 18 that Defendant intends for Washington residents to rely on in making consumer purchasing
 19 decisions.

20 15. This marketing tactic involves a fundamental misrepresentation of fact regarding
 21 the duration of a promotion. Federal Trade Commission (FTC) regulations prohibit this practice,
 22 stating that sellers may not “make a ‘limited’ offer which, in fact, is not limited.” 16 CFR § 233.5.

23 16. The clear purpose of this tactic is to grab the consumer's attention and induce her
 24 immediate action to secure savings that, it appears, will not be available beyond a specific
 25 window of time. Research indicates that limited-time discounts create a sense of urgency that
 26 changes consumer decision making, including by persuading customers to purchase items sooner
 27

1 than they otherwise would, purchase more or different items than they otherwise would, or forego
 2 comparison shopping. Defendant's subject lines tap into these well-known psychological effects
 3 and influence consumer behavior in a deceitful way.

4 17. For example, taking advantage of consumers' perceived urgency around Black
 5 Friday shopping, Defendant sent an email on November 24, 2023, at 1:15 PM Pacific Time with
 6 the subject line, "Today ONLY: Up to 50% off Black Friday." By stating that the sale, "Up to
 7 50% Off," was "Today ONLY," Defendant created a sense of urgency and tapped into the well-
 8 known consumer desire to secure an unusual deal during a Black Friday promotion before it was
 9 gone. But that subject line was false and misleading. The next day, on November 25, 2023,
 10 Defendant sent another email at 3:16 PM Pacific Time reading "Up to 50% OFF – Extended
 11 Black Friday." Both emails offered the same slew of Black Friday deals within. The second email
 12 demonstrates the falsity of the first: by extending the Black Friday details, the initial email on
 13 November 24, 2023, stressing that such a deal was "Today ONLY," was revealed as false and
 14 misleading. The subject line of the November 24, 2023, emails was false and misleading because
 15 Defendant knew (or should have known) that November 24, 2023, was not the last day of the
 16 sale and that the sale would continue through the following day.

17 18. The chart below shows a series of emails transmitted by Defendant following this
 18 pattern:

Date	Subject Line
11/24/2023	Today ONLY: Up to 50% off Black Friday
11/25/2023	Up to 50% OFF.- Extended Black Friday
11/27/2023	Cyber Monday ENDS Now
11/28/2023	Cyber DEALS are extended
11/29/2024	Ends NOW: Black Friday Only Deals
11/30/2024	Black Friday One More Chance

1 19. In each case, Defendant touts on one day a deal that is slated to end “NOW” or
2 that is “Today ONLY,” stressing to consumers they must act before losing out on an unusual
3 deal, when Defendant, upon information and belief, always planned to continue the sale until at
4 minimum one more day.

5 20. Defendant’s frequent announcement of promotions that are purportedly scheduled
6 for a set amount of time, followed by “surprise” extensions just hours later, is the product of
7 careful advance planning than late-night iteration. Sophisticated direct-to-consumer retailers
8 such as Defendant typically create marketing plans that set the cadence and content of marketing
9 emails in advance, rather than iterating on the duration of a promotion hours after launching it or
10 in the late hours of the day. On information and belief, Defendant's marketing team uses A/B
11 testing and similar experiments to enhance the effectiveness of its email marketing campaigns.
12 In general, A/B testing enables retailers to quantify the effectiveness of particular marketing
13 techniques, including email subject lines touting time-limited promotions and purported last-
14 minute "extensions" of those promotions. Defendant likely would not use this marketing tactic,
15 or at least would use it less frequently, if it were not successful in generating sales. Defendant’s
16 frequent use of this tactic suggests Defendant has conducted A/B testing of these email subject
17 lines and determined that this tactic increases sales, which in turn will show that representations
18 of fact in an email subject line regarding the expiration or extension of limited-time promotions
19 are among the type of "facts Washington residents would depend on in making their consumer
20 decisions." *Brown v. Old Navy, LLC*, 567 P.3d 38, 37 (Wash. 2025).

21 21. In some cases, the timing of Defendant’s marketing emails excludes any
22 reasonable possibility that Defendant extended the period for a specific promotional offer on an
23 ad hoc, last-minute basis in response to business conditions or performance targets. For example,
24 the email with subject line “Cyber Monday ENDS Now” was sent on November 27, 2023, at
25 11:30 PM Pacific Time, and included in the body of the email that “our Cyber Monday deals end
26 tonight.” Yet just fourteen hours later, Defendant sent an email stating “Cyber DEALS are
27

1 extended” at 2:15 PM Pacific Time on November 28, 2023. Similarly, on November 29, 2024,
 2 Defendant sent an email at 10:29 PM Pacific Time with the subject line “Ends NOW: Black
 3 Friday Only Deals,” emphasizing the deals would only be in effect on “Black Friday” (which
 4 was, in fact, Friday November 29, 2024), and then only thirteen hours later sending an email
 5 stating “Black Friday One More Chance,” revealing the sale was always going to continue. It is
 6 not likely that Defendant made an ad hoc business decision during the overnight hours to
 7 continue, and then to extend, the promotional period for either of these sales. This is particularly
 8 unlikely given the sophisticated and carefully planned approach to promotional email marketing
 9 typically employed by direct-to-consumer retailers such as Defendant.

10 22. The emails at issue are electronic mail messages, in that they were each an
 11 electronic message sent to an electronic mail address; the emails from Defendant also referred to
 12 an internet domain, whether or not displayed, to which an electronic mail message can or could
 13 be sent or delivered.

14 23. The emails at issue are commercial in nature in that the purpose of the emails is
 15 to promote goods for sale by Defendant and induce consumers into making purchases from
 16 Defendant.

17 24. The emails were sent at Defendant's direction and were approved by Defendant.

18 **C. Defendant initiates (or conspires to initiate) the transmission of commercial emails**
 19 **to consumers whom it knows or has reason to know reside in Washington.**

20 25. Defendant sent the false or misleading commercial emails to email addresses that
 21 Defendant knew or had reason to know were used by Washington residents.

22 26. Defendant knows where many of its customers and email recipients reside through
 23 several methods.

24 27. For any person who places an order online from Defendant, Defendant associates
 25 an email address with a shipping address and a billing address for that order. Thus, Defendant's
 26 online order records allow it to determine whether an email address is associated with a
 27 Washington resident.

1 28. Defendant also encourages online shoppers to create online accounts. Customers
2 save information in their accounts, including their email address, shipping addresses, billing
3 addresses, and phone numbers.

4 29. Defendant also sells its products through third-party retailers with locations in
5 Washington. On information and belief, for any customer who makes an in-store purchase,
6 Defendant or its retail partners may request and record the customer's email address at the point
7 of sale, associate it with the store location where the transaction occurred, and use that
8 information for future marketing. Defendant therefore knows or has reason to know when an
9 email address is associated with a customer who shopped at a Washington retail location and,
10 accordingly, that the address likely belongs to a Washington resident.

11 30. Defendant also knew or had reason to know that it sends marketing emails to
12 Washington residents based on data it collects and uses in connection with its marketing
13 operations. Defendant's publicly posted Privacy Policy discloses that it collects IP addresses and
14 internet activity data from its website visitors and email recipients, and that it shares this data
15 with marketing providers and analytics providers. These disclosures establish that Defendant had
16 the technical means and operational practices to determine that Plaintiff's email address was held
17 by a Washington resident.

18 **D. Defendant initiated (or conspired to initiate) the transmission of illegal emails to**
19 **Plaintiff and the class.**

20 31. At all times relevant to this Complaint, Plaintiff resided in Washington State.

21 32. Plaintiff has received Defendant's commercial electronic mail messages since at
22 least November 2023. Plaintiff received each one of the emails listed in the table of paragraph
23 18.

24 33. Plaintiff has received at least hundreds of marketing emails from Defendant since
25 that time. He typically receives marketing emails from Defendant on a daily basis. During peak
26 shopping periods, he receives multiple emails a day.

34. Defendant knew or had reason to know that Plaintiff's email address was held by a Washington resident. On multiple occasions, Plaintiff used his email address to place an online order using Defendant's website. Plaintiff received email order confirmations from Defendant for each order, and each confirmation email identified Plaintiff's billing and shipping addresses in Washington. Thus, Defendant knew that Plaintiff's email address belonged to a Washington resident.

35. Plaintiff does not want to receive emails with false and misleading subject lines from Defendant, though he would like to continue receiving truthful information from Defendant regarding its products. However, due to Defendant's conduct, Plaintiff cannot tell which emails from Defendant contain truthful information and which emails are spam with false and misleading information designed to spur him to make a purchase.

36. Plaintiff continues to receive emails with false and misleading subject lines. Defendant is aware of all the emails it has sent to Plaintiff, and discovery will show the full number of illegal spam emails Defendant has sent throughout the relevant period.

VI. CLASS ACTION ALLEGATIONS

Class Definition

37. Pursuant to CR 23, Plaintiff brings this case as a class action on behalf of a Class defined as:

All Washington residents who, within four years before the date of the filing of this action until the date of trial, received an email from or at the behest of Defendant that contained a subject line that (a) states or implies that a particular promotion will be available for a specified period of time when the actual period for the sale is longer, or (b) states that the time period for a promotion has been extended when Defendant previously intended for the sale to continue to that date.

38. The following people are excluded from the proposed Class: (1) any Judge presiding over this action and the members of the Judge's family; (2) Defendant, Defendant's subsidiaries, parents, successors, predecessors, and any entity in which the Defendant or its

1 parents have a controlling interest and their current employees, officers, and directors; (3) persons
2 who properly execute and file a timely request for exclusion from the class; and (4) persons
3 whose claims in this matter have been finally adjudicated on the merits or otherwise released.

4 ***Numerosity and Ascertainability***

5 39. The Class is so numerous that joinder of all members is impracticable.

6 40. On information and belief, the Class has thousands of members, based on the
7 population of Washington and Defendant's national footprint.

8 41. The disposition of the claims of the Class in a single action will provide substantial
9 benefits to all parties and the Court.

10 42. On information and belief, Class members can be identified through Defendant's
11 records, including sales records, account records, customer profiles, and email recipient lists.

12 ***Commonality and Predominance***

13 43. There are numerous questions of law and fact common to Plaintiff and members
14 of the Class.

15 44. The core of this case is Defendant's standard and established practice of
16 knowingly (or with knowledge that may be fairly implied) initiating commercial emails with
17 false or misleading subject lines to consumers residing in the State of Washington. The common
18 factual and legal issues arising from this conduct predominate over any individual issues.
19 Adjudication of these common issues in a single action has important and desirable advantages
20 of judicial economy.

21 45. Common questions of law and fact include, but are not limited to: (a) whether the
22 subject lines of the specified emails were false or misleading; (b) whether all individuals on
23 Defendant's email list received the emails; (c) whether Defendant initiated the transmission or
24 conspired to initiate the transmission of commercial electronic mail messages to recipients
25 residing in Washington State in violation of RCW 19.190.020; (d) whether Plaintiff and the
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1 proposed Class are entitled to an injunction enjoining Defendant from sending the unlawful
2 emails in the future; and (e) the nature and extent of classwide injury and damages.

3 ***Typicality***

4 46. Plaintiff's claims are typical of the claims of the Class.

5 47. Plaintiff, like the members of the Class, resided in Washington when he received
6 the emails at issue.

7 48. Plaintiff's claims, like the claims of the Class, arise out of a common course of
8 conduct by Defendant. Plaintiff and all Class members suffered the same injury insofar as they
9 received at least one email with a false or misleading subject line.

10 49. The legal arguments and remedial theories bearing on Plaintiff's claims are typical
11 of the claims of other putative class members.

12 ***Adequacy***

13 50. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff has
14 retained competent and capable attorneys with significant experience in complex and class action
15 litigation, including consumer class actions and class actions involving violations of
16 Washington's consumer protection statutes. Plaintiff and his counsel are committed to
17 prosecuting this action vigorously on behalf of the Class and have the financial resources to do
18 so. Neither Plaintiff nor his counsel have interests that are contrary to or that conflict with the
19 interests of the proposed Class.

20 ***Superiority***

21 51. Class treatment is superior to multiple individual suits or piecemeal litigation
22 because it conserves judicial resources, promotes consistency and efficiency of adjudication,
23 provides a forum for small claimants, and deters future illegal activity. Class adjudication would
24 serve the interests of individual class members, who would have little incentive to pursue their
25 claims separately because any individual recovery would be small in comparison to the costs of
26 litigation.

52. This is an appropriate forum for concentrating the claims of the members of the Class, who are Washington consumers.

53. It will be feasible to manage this case as a class action.

Injunctive Relief

54. Defendant's conduct is uniform as to all members of the Class. Defendant has acted or refused to act on grounds that apply generally to the Class, so that final injunctive relief or declaratory relief is appropriate with respect to the Class as a whole. Plaintiff further alleges, on information and belief, that the emails described in this complaint are substantially likely to continue in the future if an injunction is not entered.

VII. CLAIMS FOR RELIEF

COUNT I

**Violations of Washington's Commercial Electronic Mail Act, RCW 19.190 *et seq.*
On behalf of Plaintiff and the Proposed Class**

55. Plaintiff realleges and incorporates by reference each and every allegation set forth in the preceding paragraphs.

56. Washington's CEMA prohibits any "person," as that term is defined in RCW 19.190.010(11), from initiating or conspiring to initiate the transmission of a commercial electronic mail message from a computer located in Washington or to an electronic mail address that the sender knows or "consciously avoids knowing" is held by a Washington resident that contains false or misleading information in the subject line.

57. Defendant is a "person" within the meaning of the CEMA, RCW 19.190.010(11).

58. Defendant's acts and omissions violated RCW 19.190.020(1)(b). As described in detail above, Defendant initiated the transmission or conspired to initiate the transmission of one or more commercial electronic mail messages to Plaintiff and proposed Class members with false or misleading information in the subject line, that Defendant  actual knowledge that the messages contained false or misleading information, or that such knowledge was fairly implied on the basis of the objective circumstances. In particular, these emails contained subject lines

describing specific, limited-time promotions that were not, in fact, limited to the timeframe described in the subject line. The subject lines also misrepresented the end dates for the promotions, tricking consumers into thinking the promotion would end earlier than Defendant planned them to. In each case, these subject lines conveyed objective statements of fact regarding the duration or availability of a promotion that were false or misleading and that Defendant intended for Washington residents to depend on in making consumer purchasing decisions.

59. Defendant's acts and omissions injured Plaintiff and proposed Class members.

60. The balance of the equities favors the entry of permanent injunctive relief against Defendant. Plaintiff, the members of the Class, and the general public will be irreparably harmed absent the entry of permanent injunctive relief against Defendant. A permanent injunction against Defendant is in the public interest. Defendant's unlawful behavior is, based on information and belief, ongoing as of the date of the filing of this pleading; absent the entry of a permanent injunction, Defendant's unlawful behavior will not cease and, in the unlikely event that it voluntarily ceases, is likely to reoccur.

61. Plaintiff and Class members are therefore entitled to injunctive relief in the form of an order enjoining further violations of RCW 19.190.020(1)(b).

COUNT II

Per se violations of Washington's Consumer Protection Act, RCW 19.86 *et seq.* On Behalf of Plaintiff and the Proposed Class

62. Plaintiff realleges and incorporates by reference each and every allegation set forth in the preceding paragraphs.

63. Plaintiff and Class members are "persons" within the meaning of the CPA, RCW 19.86.010(1).

64. Defendant violated the CEMA by initiating or conspiring to initiate the transmission of commercial electronic mail messages to Plaintiff and Class members that contain false or misleading information in the subject line, that Defendant knew or should have known was false.

65. A violation of CEMA is a per se violation of the Washington Consumer Protection Act ("CPA"), RCW 19.86.010, et seq.; RCW 19.190.030.

66. A violation of CEMA establishes all five elements of a CPA claim as a matter of law.

67. Defendant's violations of CEMA are unfair or deceptive acts or practices that occur in trade or commerce under the CPA. RCW 19.190.100.

68. Defendant's unfair or deceptive acts or practices vitally affect the public interest and thus impact the public interest for purposes of applying the CPA. RCW 19.190.100.

69. Pursuant to RCW 19.190.040(1), damages to each recipient of a commercial electronic mail message sent in violation of CEMA are the greater of \$100 for each such message or actual damages, which establishes the injury and causation elements of a CPA claim as a matter of law. *Wright v. Lyft, Inc.*, 189 Wn.2d 718, 732, 406 P.3d 1149, 1155 (Wash. 2017).

70. As a result of Defendant's acts and omissions, Plaintiff and Class members are entitled to \$100 in statutory damages for each and every email that violates the CEMA.

71. Defendant engaged in a pattern and practice of violating CEMA.

72. Plaintiff and Class members are entitled to recover reasonable attorneys' fees and costs, pursuant to RCW 19.86.090.

73. Plaintiff and members of the Class are also entitled to, and do seek, injunctive relief prohibiting Defendant from violating the CPA in the future.

VIII. REQUEST FOR RELIEF

WHEREFORE, Plaintiff, on his own behalf and on behalf of the members of the Class, seeks judgment against Defendant and requests that the Court:

- A. Certify the asserted claims, or the issues raised, as a class action;
- B. Appoint Plaintiff as Class Representative;
- C. Appoint the undersigned counsel as counsel for the Class;

- 1 D. Enter declaratory, equitable, and/or injunctive relief as permitted by law to ensure
2 Defendant does not continue to engage in the unlawful conduct described in this
3 Complaint, and an accompanying order that the Court retain jurisdiction for a
4 period of at least six months to ensure that Defendant complies with those
5 measures;
- 6 E. Enter an order to ensure that Defendant is restrained from altering, deleting, or
7 destroying any documents or records that could be used to identify members of
8 the Class;
- 9 F. Award statutory damages where applicable;
- 10 G. Award pre- and post-judgment interest;
- 11 H. Award reasonable attorneys' fees and costs, as allowed by law, including but not
12 limited to RCW 19.86.090; and
- 13 I. Award any other relief the Court deems just or reasonable under the
14 circumstances.
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1 Dated: September 9, 2026

Respectfully submitted,

2
3 By /s/Cecily C. Jordan

Kim D. Stephens, WSBA #11984

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CIVIL COVER SHEET

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

I. (a) PLAINTIFFS

KLINE WRIGHT, on behalf of himself and all other similarly situated,

(b) County of Residence of First Listed Plaintiff King Co., WA
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Kim Stephens, Cecily Jordan, Arshia Nilchian; Tousley Brain Stephens; 1200 5th Ave., Suite 1700, Seattle, WA 98101; Ph. 206-682-5600

DEFENDANTS

The Ridge Wallet LLC d/b/a Ridge, a Delaware corporation

County of Residence of First Listed Defendant Los Angeles Co., CA
(IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known)

Al Roundtree; Fox Rothschild LLP; 1001 4th Ave., Suite 4400, Seattle, WA 98154; Ph. 206-624-3600

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

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question
(U.S. Government Not a Party)
- ☒ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

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

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

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

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

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

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

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. §§ 1332(d), 1441 (a) and (b), and 1453

Brief description of cause:

Putative class-action for alleged violations of Washington Consumer Electronic Mail Act and Consumer Protection Act

VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

Greater than \$75,000

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

10/15/2026

SIGNATURE OF ATTORNEY OF RECORD

s/ Al Roundtree

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

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