

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT

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JEFFREY S. BAGNELL and		)	
JEFFREY S. BAGNELL, ESQ., LLC,		)	
		)	
	<i>Plaintiffs,</i>	)	
		)	Civil Action No.: 3:25-cv-00625-VAB
	v.	)	
		)	
SIG SAUER, INC.,		)	
		)	
	<i>Defendant.</i>	)	
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**SIG SAUER, INC.’S MOTION TO DISMISS  
PLAINTIFFS’ AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(6), SIG Sauer, Inc. (“SIG”), hereby moves the Court to dismiss Plaintiffs’ Amended Complaint, D.E. # 9, with prejudice. Plaintiffs fail to state claims for libel *per se* (Count One) and for violation of the Connecticut Unfair Trade Practices Act (CUTPA) (Count Two) because the statements on which Plaintiffs’ claims are based are not “defamatory statements” as a matter of law because they constitute the opinions of SIG, and because the statements do not identify Plaintiffs as required under Connecticut law. Plaintiffs have already amended their complaint once; dismissal with prejudice is appropriate because further efforts to amend would be futile.

In support of this Motion, SIG relies upon its Memorandum of Law In Support of SIG’s Motion to Dismiss Plaintiffs’ Amended Complaint.

For the reasons set forth in the accompanying Memorandum, SIG requests that the Court dismiss Plaintiffs’ Amended Complaint with prejudice.

Dated: June 19, 2025

Respectfully submitted,

SIG Sauer, Inc.

By its attorneys,

/s/ James R. Smart

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, a copy of the foregoing was filed electronically. Notice of this filing will be sent via e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Dated: June 19, 2025

/s/ James R. Smart  
James R. Smart