

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
PHOENIX DIVISION**

**ABC IP, LLC, a Delaware limited
liability company,**

**RARE BREED TRIGGERS, INC., a
Texas corporation,**

and

**RBTM LLC, a Wyoming limited liability
company**

Plaintiffs.

v.

**BSSquirts LLC, an Arizona limited
liability company,**

and

Samuel Hopson, an individual,

Defendants.

CASE NO. _____

**COMPLAINT FOR PATENT AND
TRADEMARK INFRINGEMENT**

JURY TRIAL DEMANDED

This is an action for patent and trademark infringement in which ABC IP LLC (“ABC”), Rare Breed Triggers, Inc. (“Rare Breed”), and RBTM LLC (“RBTM”) (collectively, “Plaintiffs”) accuse BSSquirts LLC and Samuel Hopson (collectively, “Defendants”) of infringing U.S. Patent Nos. 12,038,247, 12,031,784, 12,529,538, 12,578,159, and 12,636,403; infringing Plaintiffs’ trademark rights; and engaging in unfair competition as follows:

PARTIES

1. ABC is a limited liability company organized under the laws of the State of Delaware with an address at 8 The Green, Suite A, Dover, Delaware 19901.

2. Rare Breed is a Texas corporation having a place of business at 2710 Central Freeway, Suite 150-151, Wichita Falls, TX 76306.

3. RBTM is a limited liability company organized under the laws of the State of Wyoming with an address at 1309 Coffeen Avenue, STE 1200, Sheridan, Wyoming 82801.

4. Upon information and belief, BSSquirts LLC is a limited liability company organized under the laws of Arizona with an address of 4539 N 22ND ST, STE N, Phoenix, AZ 85016.

5. Upon information and belief, Samuel Hopson is an individual residing at 9004 Walnut Knolls Way, Apt 101, Las Vegas, NV 89117, who is an owner or sole owner of BSSquirts LLC and directs its operations, including directing BSSquirts LLC to sell products in violation of the Asserted Patents and FRT[®] Family of Marks.

JURISDICTION AND VENUE

6. This is an action for patent infringement arising under 35 U.S.C. §§ 271(a)–(c), 281, and 284–85; trademark infringement; false designation of origin; and unfair competition under 15 U.S.C. §§ 1114 and 1125(a).

7. This Court has subject matter jurisdiction over this action under 28 U.S.C. § 1338, which directs that United States District Courts shall have original jurisdiction of any civil action arising under any Act of Congress relating to patents and pursuant to 28 U.S.C. § 1331, which pertains to civil actions arising under the laws of the United States.

8. Personal jurisdiction over Defendants is proper in this District because the Defendants reside in and have a regular and established place of business in this District.

9. Venue is proper in this district pursuant to 28 U.S.C. § 1400(b). Defendants reside in or have committed acts of infringement and have a regular and established place of business in this District.

BACKGROUND

10. This lawsuit asserts (a) direct, contributory, and induced infringement of U.S. Patent 12,038,247, 12,031,784, 12,529,538, 12,578,159, and 12,636,403; and (b) trademark infringement, false designation of origin, and unfair competition with regard to Plaintiffs' well-known FRT[®] trademark.

11. The '247 Patent was lawfully and properly issued by the United States Patent and Trademark Office on July 16, 2024. Each and every claim of the '247 Patent is valid and enforceable. A true and correct copy of the '247 Patent is attached as Exhibit A.

12. The '784 Patent was lawfully and properly issued by the United States Patent and Trademark Office on July 9, 2024. Each and every claim of the '784 Patent is valid and enforceable. A true and correct copy of the '784 Patent is attached as Exhibit B.

13. The '538 Patent was lawfully and properly issued by the United States Patent and Trademark Office on January 20, 2026. Each and every claim of the '538 Patent is valid and enforceable. A true and correct copy of the '538 Patent is attached as Exhibit C.

14. The '159 Patent was lawfully and properly issued by the United States Patent and Trademark Office on March 17, 2026. Each and every claim of the '159 Patent is valid and enforceable. A true and correct copy of the '159 Patent is attached as Exhibit D.

15. The '403 Patent was lawfully and properly issued by the United States Patent and Trademark Office on May 26, 2026. Each and every claim of the '403 Patent is valid and enforceable. A true and correct copy of the '403 Patent is attached as Exhibit E.

16. ABC is the current owner by assignment of all right, title and interest in and to the Asserted Patents. These assignments have been recorded at the United States Patent and Trademark Office ("USPTO").

17. RBTM is the owner of the registered trademark FRT[®] and variations thereof. Since at least 2020, the FRT[®] mark has been used under license by Plaintiff Rare Breed to identify unique trigger products for firearms, which has been a remarkably successful offering. As a result of the long-term and high-profile use, the FRT[®] trademark has come to be uniquely identified with Rare Breed and a valuable identifier of Rare Breed's products. In addition to strong common law rights in the FRT[®] trademark, RBTM also owns the following federally registered family of trademarks and pending applications, including the right to enforce the marks against infringers:

Mark	Goods	App. No.	Reg. No.	App. Date	Reg. Date
FRT	triggers for firearms	97248519	8187914	2022-02-01	2026-03-24
FRT-15	triggers for firearms	97245949	7004418	2022-01-31	2023-03-21
FRT-22	triggers for firearms	97248530	8232406	2022-02-01	2026-04-28
FRT-47	triggers for firearms	97248528	8232405	2022-02-01	2026-04-28
FRT-MR3	triggers for firearms	99714625		2026-03-20	
FRT-RD3	triggers for firearms	99714703		2026-03-20	
FRT-15L3	triggers for firearms	98715335	8225451	2024-08-24	2026-04-21

Together, Plaintiffs' common law rights in and federal trademark registrations and pending applications are referred to as the "FRT Marks."

18. Rare Breed is the exclusive licensee of the Asserted Patents and the FRT[®] Family of Marks.

19. Plaintiffs have complied with the requirements of 35 U.S.C. § 287 either because the Asserted Patents are not practiced by ABC or any licensee and/or because any licensee has been required to mark its product.

20. Upon information and belief, Defendants have committed acts of direct, contributory, and induced patent infringement, which will be described in more detail below. These acts are in violation of 35 U.S.C. § 271 and should be considered willful.

THE INVENTIONS

21. A typical AR15-pattern firearm, for example, is considered a semiautomatic firearm. The operation of a *standard disconnecter* AR-pattern trigger mechanism is commenced by the trigger member being pulled by the user. The trigger member releases the hammer from the trigger sear and allows the hammer to strike the firing pin. A portion of the propellant gas is used to begin the process of sending the bolt carrier to the rear of the firearm. The rearward movement of bolt carrier cocks the hammer on the disconnecter and then the bolt is allowed to return forward into battery with a new round inserted into the chamber. While this is happening, in the standard AR-pattern semiautomatic trigger, the user can either continue to hold the trigger member in a pulled (i.e., fired) state or allow the trigger to return to its reset state, in which the sear, rather than the disconnecter, engages and holds the hammer in a cocked position. When the user reduces pressure on the trigger member to allow the trigger spring to reset the trigger member, the disconnecter releases the hammer to engage the trigger sear.

22. In the standard AR-pattern trigger assembly, the purpose of the disconnecter is to hold the hammer in a cocked position until the trigger member is reset by a trigger spring when the user lets the trigger reset. The disconnecter allows the firearm to be fired only a single time when the trigger is pulled and held, because the user is not typically able to manually reset the trigger rapidly enough so that the sear engages before the bolt carrier or bolt returns to its in-battery position. The disconnecter prevents the firearm from either firing multiple rounds on a single pull of the trigger, or from allowing the hammer to simply “follow” the bolt carrier as it returns to battery without firing a second round, leaving the hammer uncocked.

23. In contrast, in what Plaintiffs have coined a “forced reset” trigger mechanism, cycling of the bolt carrier or bolt causes the trigger member to be mechanically moved to the reset position and hold the trigger member there until the bolt or bolt carrier is back in battery, when it is safe for the user to pull the trigger again, without the need for a disconnecter.

24. The ’247 and ’159 Patents provide a novel device for accelerating the firing sequence of any semiautomatic firearm, in contrast to a standard semiautomatic trigger or other prior art devices that allow an accelerated rate of semiautomatic firing. The device can be selected to operate in either a standard semiautomatic mode or a “forced reset” semiautomatic mode and uses a cam, rotated by cycling of the action, to cause the trigger member to reset and prevent the trigger member from being pulled again until the action has returned to the in-battery position.

25. The ’784 Patent provides a device that works in a trigger system as an extended trigger member locking mechanism for use with a semi-automatic firearm that employs, in some embodiments, a “deflectable extension of the locking member that is actuated by forward movement of the bolt carrier,” among other innovations as explicitly claimed. Certain inventions of the ’784 Patent overcome the geometric limitations of prior art designs for use in multiple and varied semi-automatic firearm designs by allowing a locking member to deflect or fold separately from the body portion of the locking member when contacted by the forward portion of the bolt carrier as it cycles to the rear.

26. The ’538 Patent provides a safety mechanism for a firearm that employs a cam selector, a lever, and a trigger. The cam selector contains multiple recesses and is configured to operate between a first mode, a second mode, and a third mode. In the first mode, a portion of the trigger referred to as a first trigger tail portion is movable within the first recess. In the second mode, the first trigger tail portion is allowed to engage the second recess and be moved down by

a cam portion of the second recess when the cam selector rotates. In the third mode, the cam selector is configured to prevent the trigger from being pulled.

27. The '223 Patent describes and claims a device in which the cycling of the action causes hammer contact with the trigger member to mechanically reset the hammer and trigger member. A locking bar prevents the trigger member from being pulled again by the user until the bolt carrier has returned to the in-battery position.

28. The '403 Patent describes and claims a similarly operating device with the additional feature that it can be selected to operate in either of two distinct modes: 1) standard disconnector semiautomatic mode and 2) “forced reset” semiautomatic mode.

29. The claims of the patents define the scope of the patented inventions.

THE INFRINGING DEVICES

30. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale products that embody the technology claimed in the Asserted Patents, including the following (collectively, the “Infringing Devices”):

I. The Super Safety

31. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale a (3-Position) Super Safety (“the Super Safety”), which embodies the technology claimed in at least the '247, '784, '538, '159, and '403 Patents.

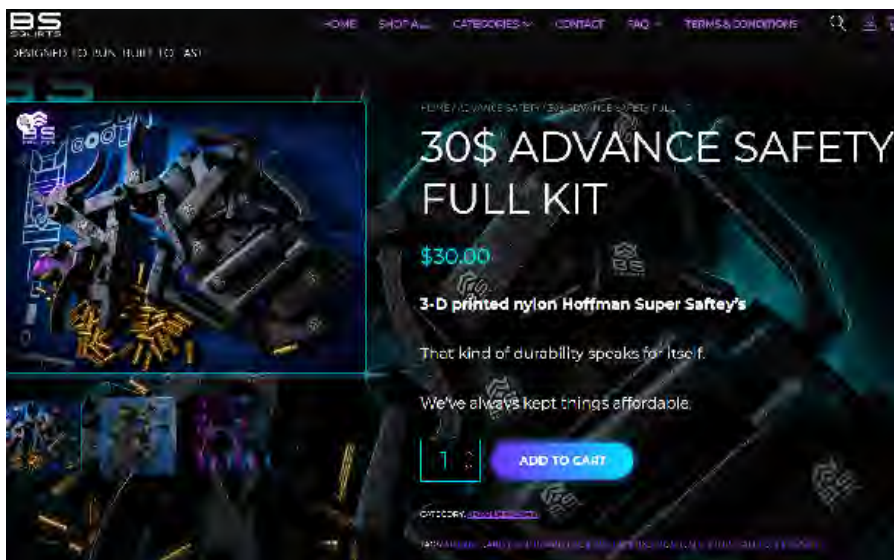
32. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the Super Safety via the website <https://www.bssquirts.store/product-category/hoffman-advance-safety/>, in multiple variants, including at least:

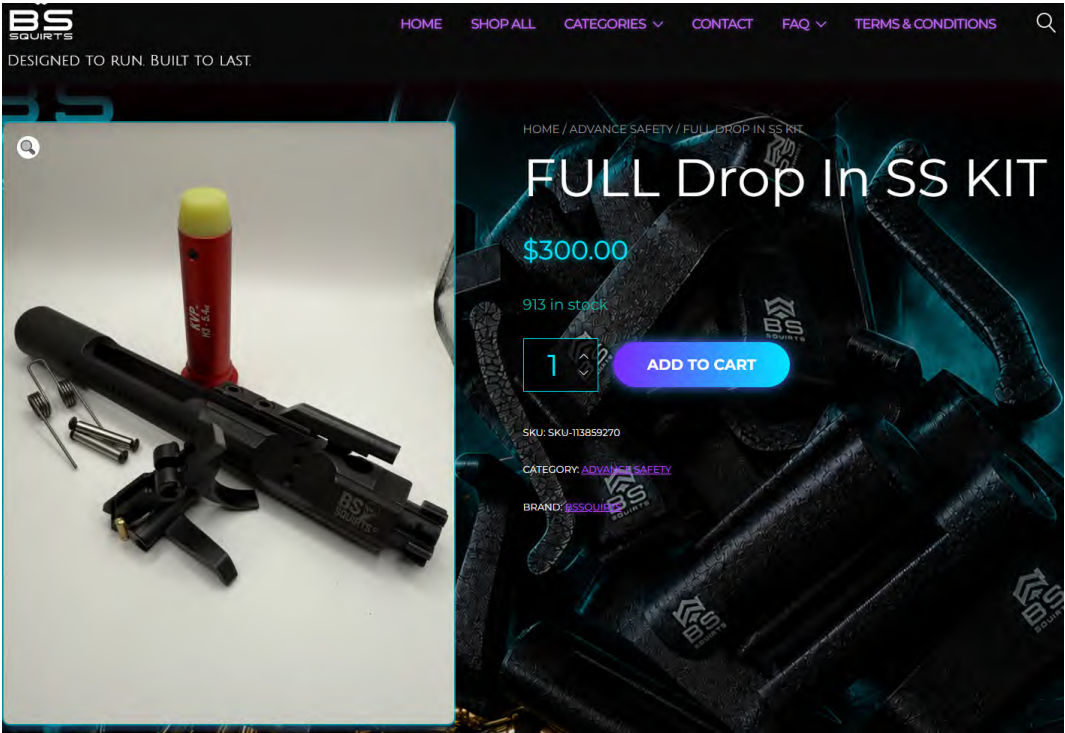
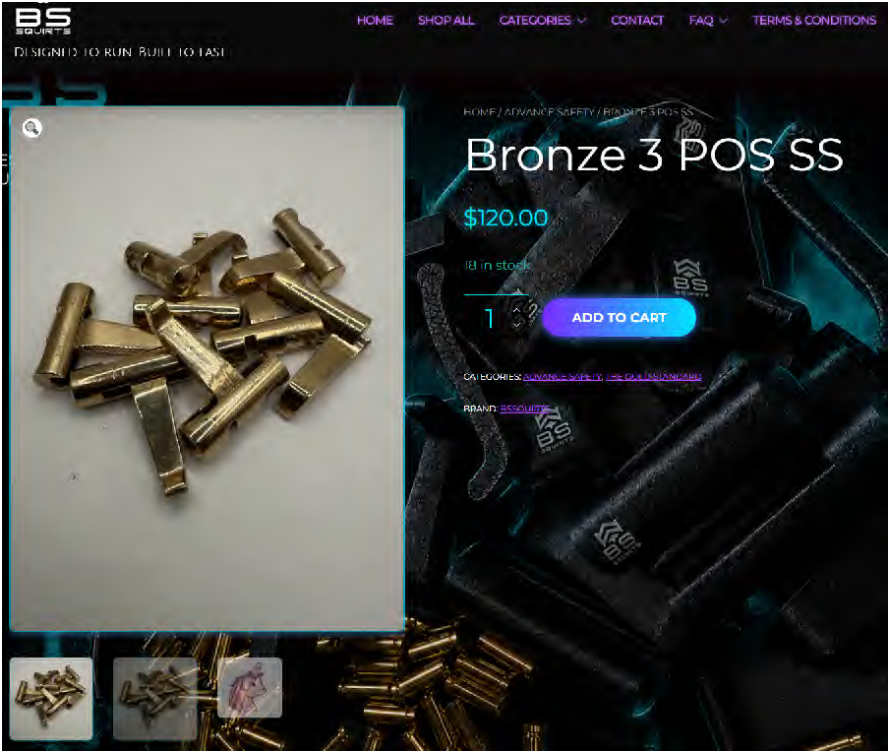
- a. A partial kit, which includes at minimum the cam and cam lever components, and may further include one or more additional components—when these

components are installed in combination with a standard AR-pattern hammer and disconnector, with standard springs, the combination creates the invention of the '247, '784, '538, '159, and '403 Patents—and/or;

- b. A complete kit, which includes at minimum the cam and cam lever components and additional components (e.g., a standard AR-pattern hammer, disconnector, standard springs, and a modified trigger); and/or
- c. A complete kit preinstalled in a receiver and/or complete firearm, which includes cam and cam lever components and additional components (e.g., a standard AR-pattern hammer, disconnector, standard springs, and a modified trigger) preinstalled in an AR-pattern receiver.

33. Exemplary photographs are shown below:





BS
SQUADS
DESIGNED TO RUN. BUILT TO LAST.

HOME SHOP ALL CATEGORIES CONTACT FAQ TERMS & CONDITIONS

HOME / ADVANCE SAFETY / HOFFMAN 4140 ADVANCE SAFETY FULL KIT

Hoffman 4140 Advance Safety FULL KIT

\$35.00 – \$55.00

Unlock rapid resets and unmatched control with the 4140 Hoffman Advance Safety – Hoffman Tactical's premium drop-in kit for Mil-Spec triggers. Crafted from heat-treated 4140 Cr-Mo steel (60 HRC) with black oxide coating, this 3-position selector (safe, semi, enhanced) fits all AR-15 Fire Control Groups – no mods needed. Includes precut trigger, detent, TPU block, and cam/lever for seamless installation. Built for competitors and tacticians: tough, precise, and compliant-focused.

4140 Super Safety Choose an option

1 ADD TO CART

SKU: N/A

BS
SQUADS
DESIGNED TO RUN. BUILT TO LAST.

HOME SHOP ALL CATEGORIES CONTACT FAQ TERMS & CONDITIONS

HOME / ADVANCE SAFETY / HOFFMAN D2 TOOL STEEL ADVANCE SAFETY FULL KIT

SALE

Hoffman D2 Tool Steel Advance Safety FULL KIT

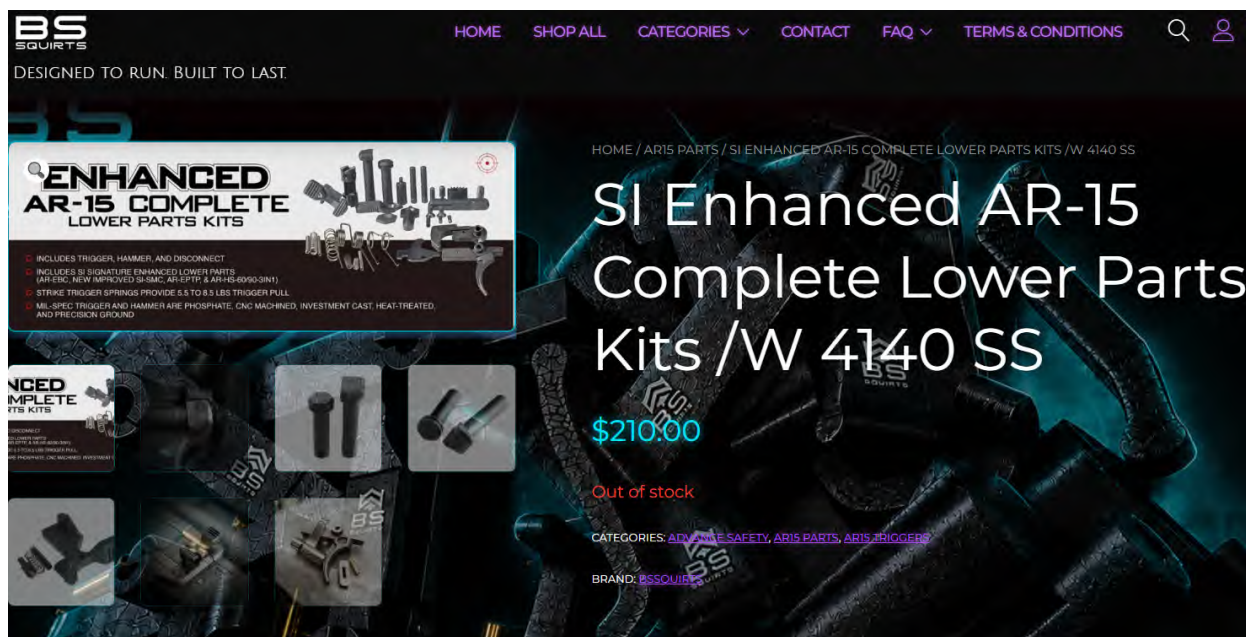
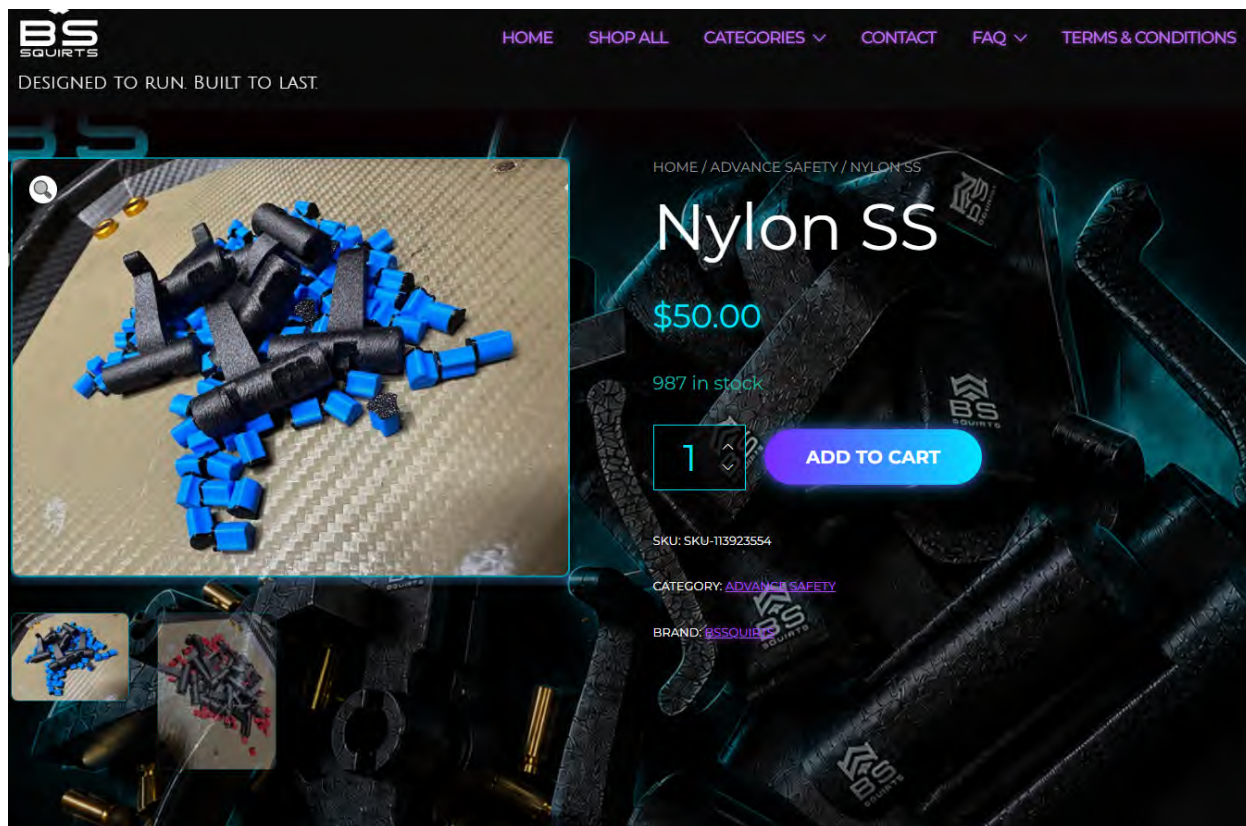
\$65.00 – \$85.00

Discover the pinnacle of AR-15 precision with our D2 Tool Steel Advance Safety Kit: EDM-cut from air-hardening alloy for unbeatable toughness and minimal distortion. Full drop-in set includes CNC-coated curved trigger, rounded detent, cam, lever, and centering block—ensuring advance -safe resets under extreme conditions. In stock, ready to ship!

D2 Super Safety Choose an option

1 ADD TO CART

SKU: N/A



34. The Super Safety can operate in a “disconnect mode,” which is much like that of a standard AR-15 trigger. The user can switch between safe, standard semiautomatic with

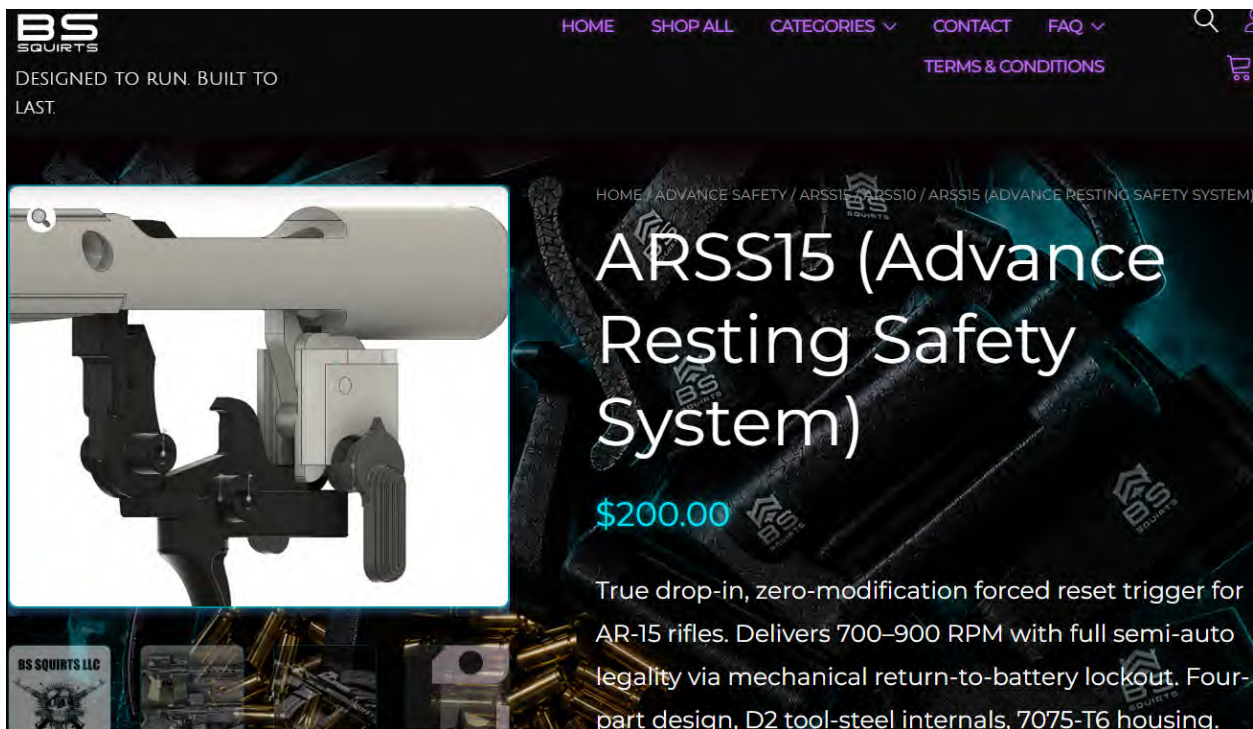
disconnecter, and “forced reset” semiautomatic with cam modes by moving the safety selector laterally between positions.

II. The ARSS15

35. On information and belief, Defendants have previously or are currently making, using, selling, and/or offering for sale an ARSS15 (“the ARSS15”), which embodies the technology claimed in at least the ’247, ’784, ’159, and ’403 Patents.

36. On information and belief, Defendants are making, using, selling, and/or offering for sale the ARSS15 via the website <https://www.bssquirts.store/product/arss15-drop-in/>.

37. Exemplary photographs are shown below:



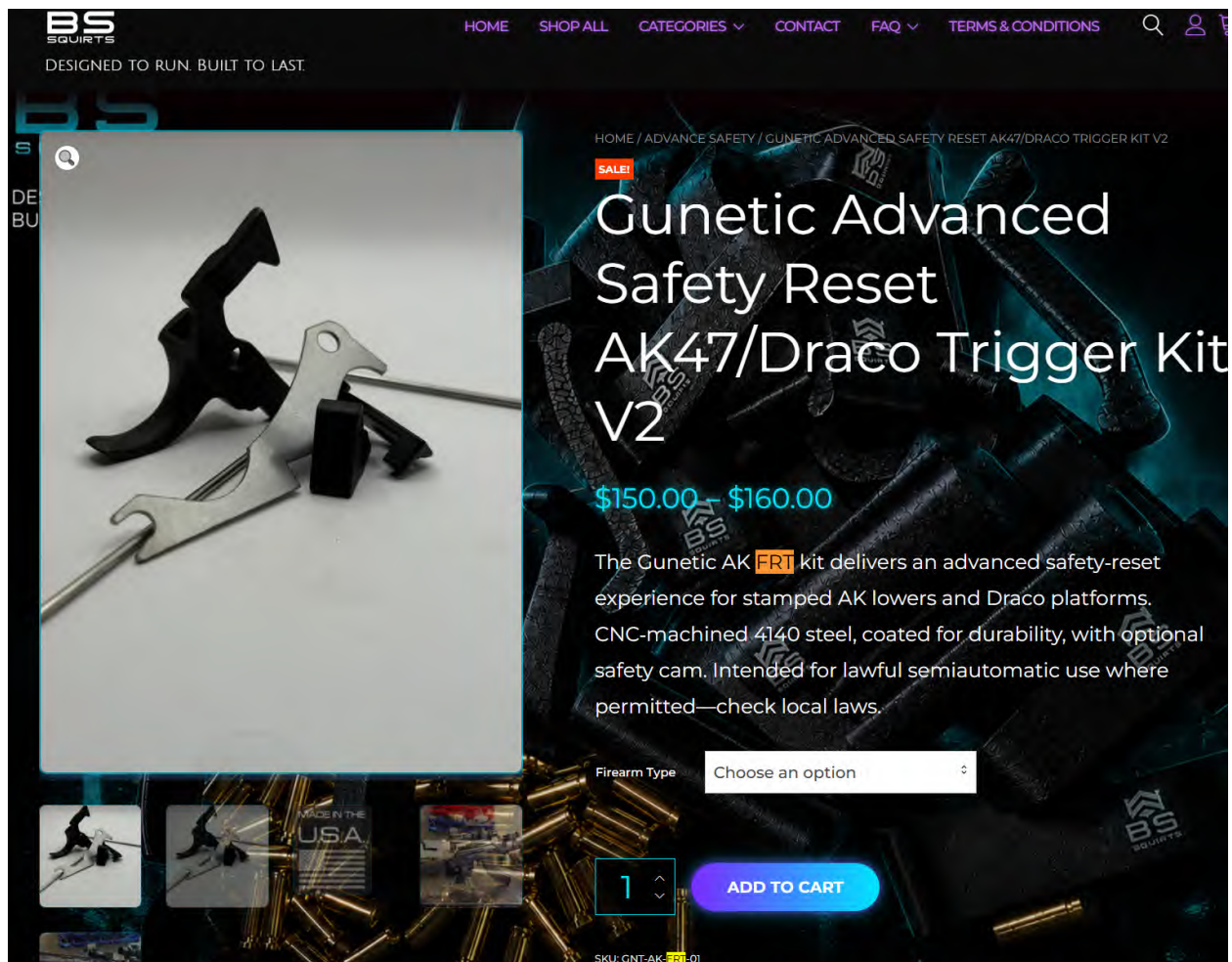
38. The ARSS15 can operate in at least a “disconnecter mode,” which is much like that of a standard AR-15 trigger. The user can switch between standard semiautomatic with disconnecter and “forced reset” semiautomatic with cam modes by rotating the safety selector between positions.

INFRINGEMENT OF THE FRT® MARKS

39. On information and belief, Defendants are distributing, advertising, and/or selling products that do not originate with Plaintiffs but that nonetheless bear or are promoted in association with the FRT® family of Marks.

40. Defendants are falsely associating their products with Plaintiffs' well-known FRT® family of Marks.

41. Defendants are advertising their products using the mark "FRT" as shown at: <https://www.bssquirts.store/?s=FRT>. Exemplary images are shown below:



BS
SQUIRTS

DESIGNED TO RUN. BUILT TO LAST.

HOME

SHOP ALL

CATEGORIES ▾

CONTACT

FAQ ▾

TERMS & CONDITIONS

Q

U

🛒

HOME / ADVANCE SAFETY / ARSS15 / ARSS10 / M16 FA AMBI SELECTOR (COMPATIBLE WITH ARSS15/ARSS10)

M16 FA Ambi Selector
(Compatible with
ARSS15/ARSS10)

\$30.00

19 in stock

1

ADD TO CART

SKU: M16-DROP-IN

CATEGORIES: [AR15 ACCESSORIES](#), [ARSS15 / ARSS10](#)

TAGS: [AR PARTS](#), [AR15 DROP IN](#), [AR15](#), [AR15](#), [M16 - AUTO](#), [SELECTOR - SAFETY](#), [SUPER SAFETY](#)

BRAND: [BSSQUIRTS](#)











BS
SQUIRTS

DESIGNED TO RUN. BUILT TO LAST.

HOME

SHOP ALL

CATEGORIES ▾

CONTACT

FAQ ▾

TERMS & CONDITIONS

Q

U

🛒

HOME / ADVANCE SAFETY / 30\$ ADVANCE SAFETY FULL KIT

30\$ ADVANCE SAFETY
FULL KIT

\$30.00

3-D printed nylon Hoffman Super Saftey's

That kind of durability speaks for itself.

We've always kept things affordable.

1

ADD TO CART

CATEGORY: [ADVANCE SAFETY](#)

TAGS: [AR PARTS](#), [AR15 DROP IN](#), [AR15](#), [AR15](#), [DROP IN](#), [M16](#), [SELECTOR - SAFETY](#), [SUPER SAFETY](#)

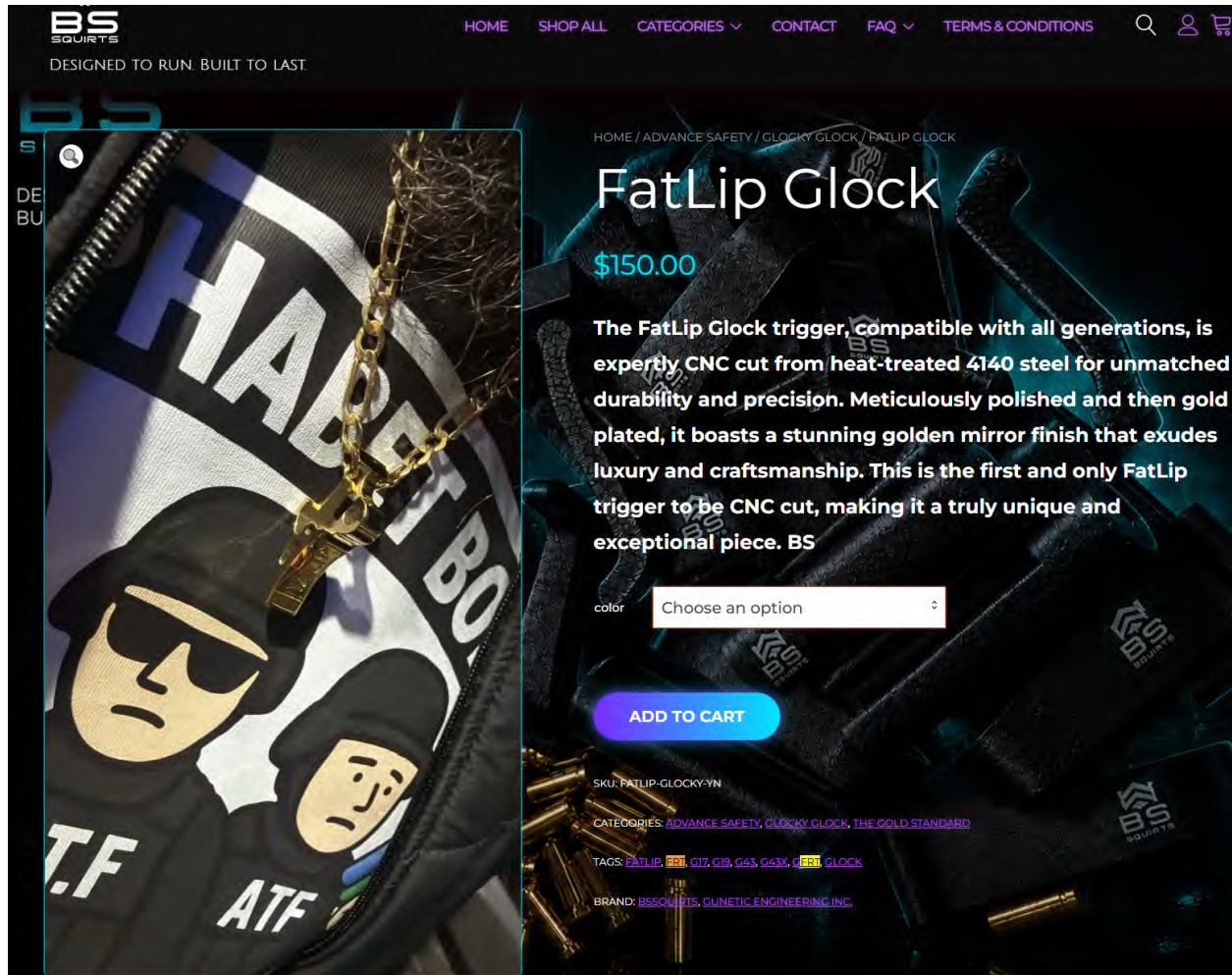








14



42. Despite Defendants' marketing, Defendants' products are **not** one of Plaintiffs' FRT products.

43. Defendants' unauthorized use of the FRT[®] Mark to identify and promote their products is likely to mislead consumers into falsely believing that Defendants' products are in fact Plaintiffs' products, or are endorsed by or associated with Plaintiffs.

44. The only reason Defendants would use the FRT[®] Mark in connection with their products is to trade on the goodwill Plaintiffs have developed in the FRT[®] family of Marks, and thus Defendants' conduct is willful.

COUNT I — INFRINGEMENT OF THE '247 PATENT

45. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

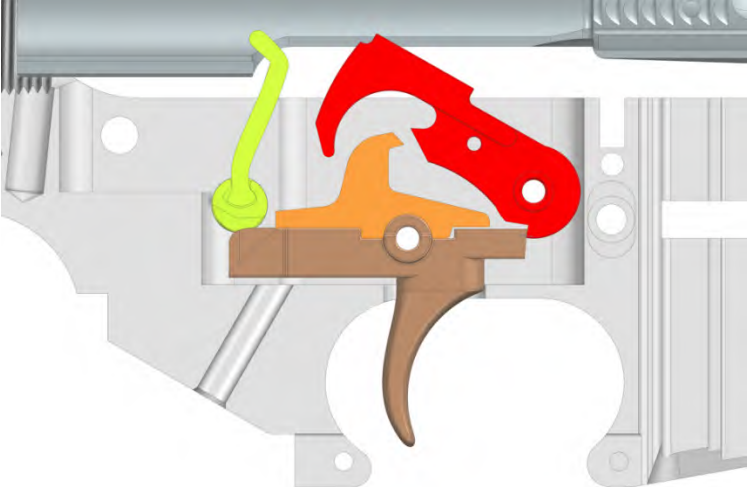
46. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '247 Patent. Such unlicensed products include the Super Safety and ARSS15.

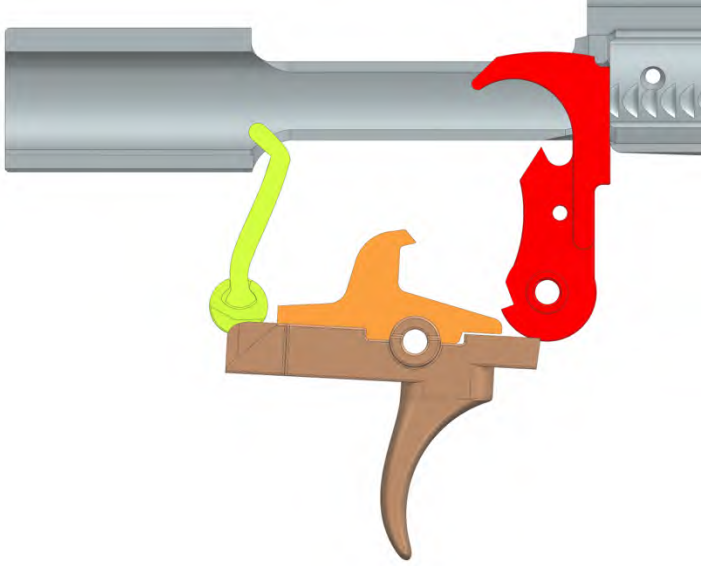
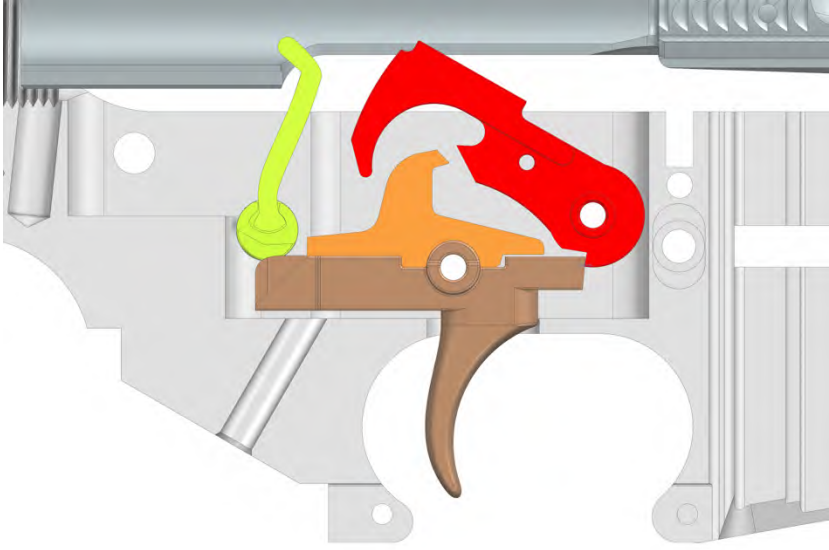
47. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents.

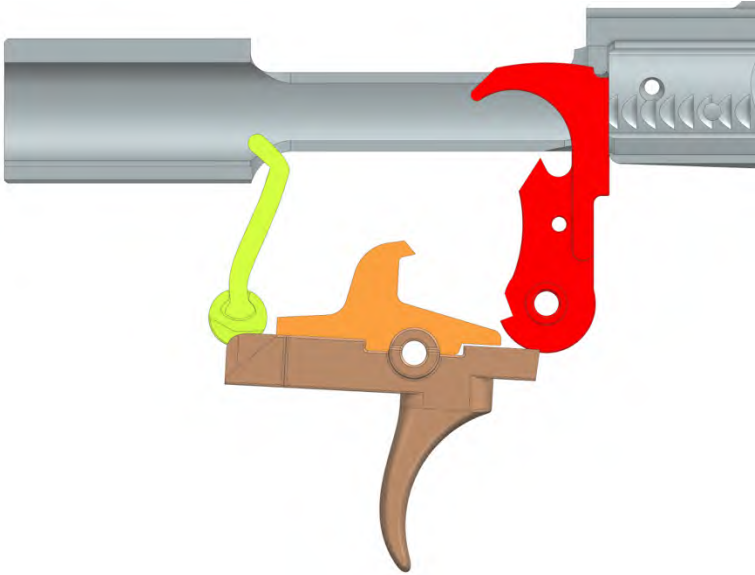
48. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

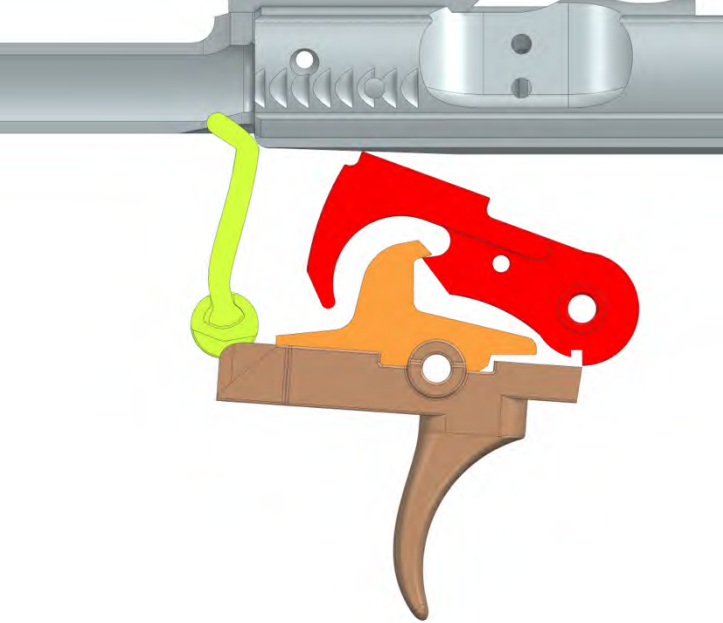
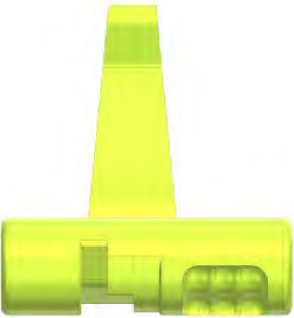
'247 Patent Claim 15	The Super Safety
15. A firearm trigger mechanism comprising:	When installed and used as directed, the Super Safety is part of a trigger mechanism and functions as a cam that in at least one mode, both causes the reset of the trigger and locks the trigger during the cycle of operation.

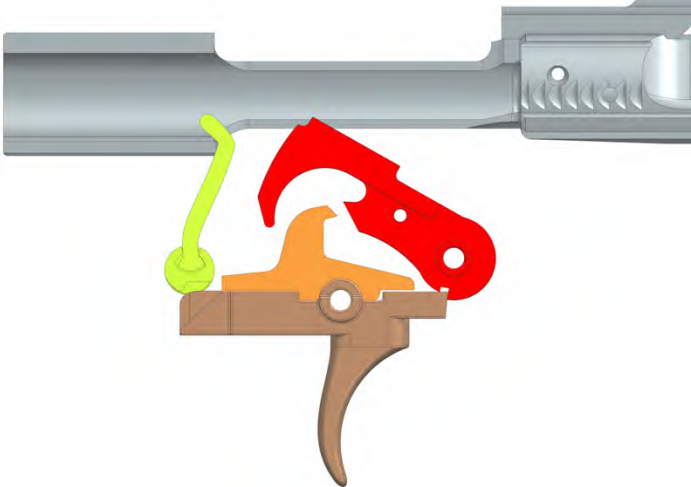
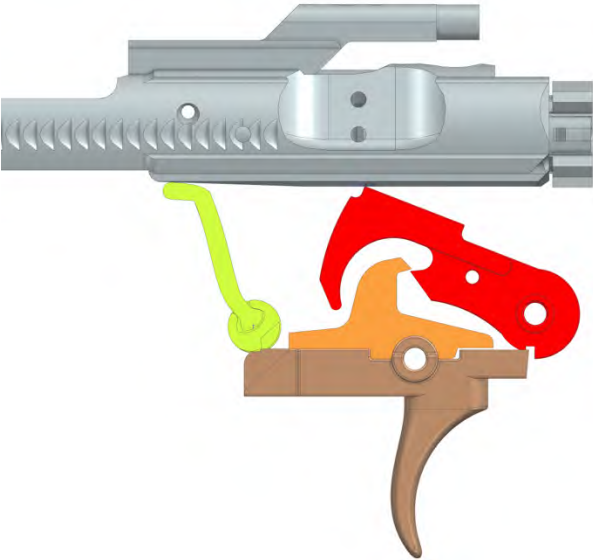
'247 Patent Claim 15	The Super Safety
	 https://www.bssquirts.store/product-category/hoffman-advance-safety/  The Super Safety <i>See also</i>, Ex. F, Super Safety 3D Printed Active Trigger System v4.4, (“Super Safety Guide”) at 12
a hammer having a sear catch and a hook for engaging a disconnecter and adapted to be mounted in a fire control mechanism pocket of a receiver	The Super Safety (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear catch and a hook for engaging a disconnecter (orange).

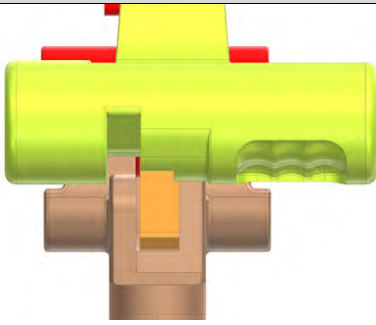
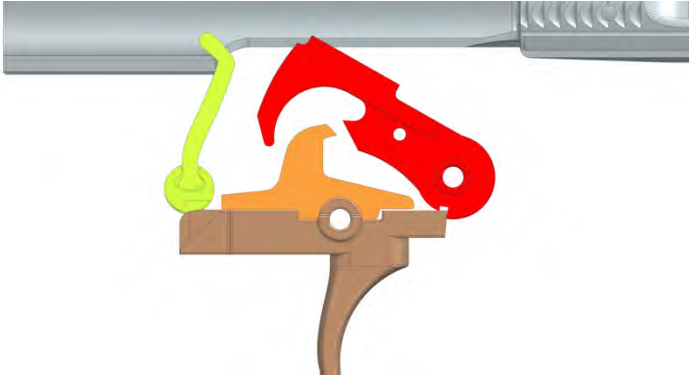
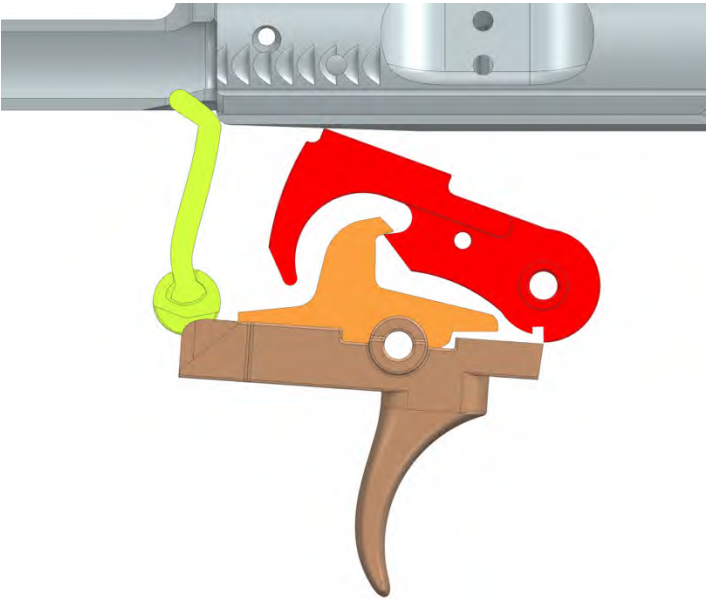
'247 Patent Claim 15	The Super Safety
	 (Plaintiff-generated renderings of the Super Safety here and below)
to pivot on a transverse hammer pivot axis between set and released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt carrier.  Hammer Set Position

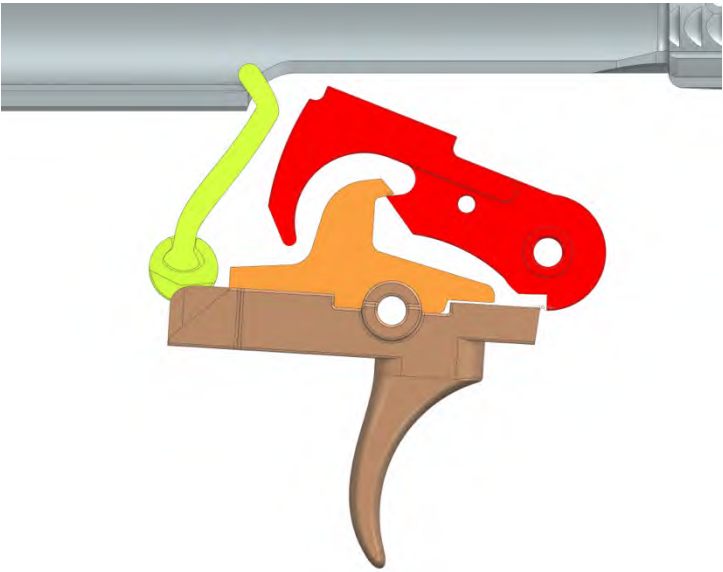
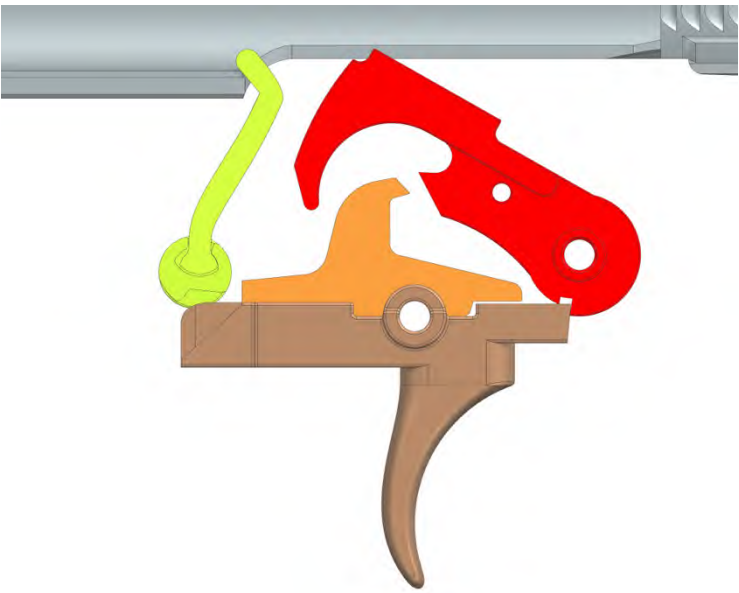
'247 Patent Claim 15	The Super Safety
	 Hammer Released Position
a trigger member having a sear and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and released positions,	The Super Safety (yellow) is installed with a trigger member (brown) in the fire control mechanism pocket and the trigger member pivots on a transverse trigger member pivot axis between set and released positions. The trigger member (brown) has a sear. 
wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member	The sear of the trigger member (brown) and sear catch of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.

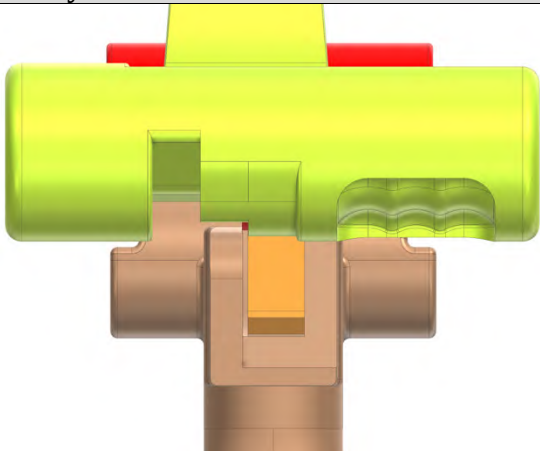
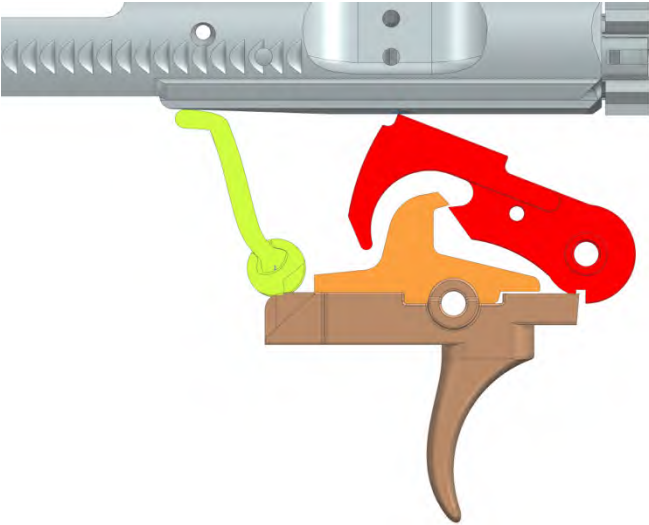
'247 Patent Claim 15	The Super Safety
	 The diagram shows a cross-sectional view of a firearm's trigger assembly. A brown trigger member is in its set position, with its sear (a small protrusion) engaged with the hammer (red). The hammer is in its cocked position, with its hook (a curved part) engaged with the trigger member. The trigger member is pivoted on a transverse axis. The hammer is pivoted on a vertical axis. The trigger member is shown in a set position, meaning it is ready to fire. The hammer is shown in a cocked position, meaning it is ready to strike the primer. The trigger member is shown in a set position, meaning it is ready to fire. The hammer is shown in a cocked position, meaning it is ready to strike the primer. Trigger Member Set Position
and are out of engagement in said released positions of said hammer and trigger member,	 The diagram shows a cross-sectional view of the same trigger assembly as the previous one, but in a released position. The trigger member (brown) is now in a released position, meaning its sear is no longer engaged with the hammer (red). The hammer is now in a released position, meaning its hook is no longer engaged with the trigger member. The trigger member is pivoted on a transverse axis. The hammer is pivoted on a vertical axis. The trigger member is shown in a released position, meaning it is not ready to fire. The hammer is shown in a released position, meaning it is not ready to strike the primer. Trigger Member Released Position
said disconnecter having a hook for engaging said hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis,	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).

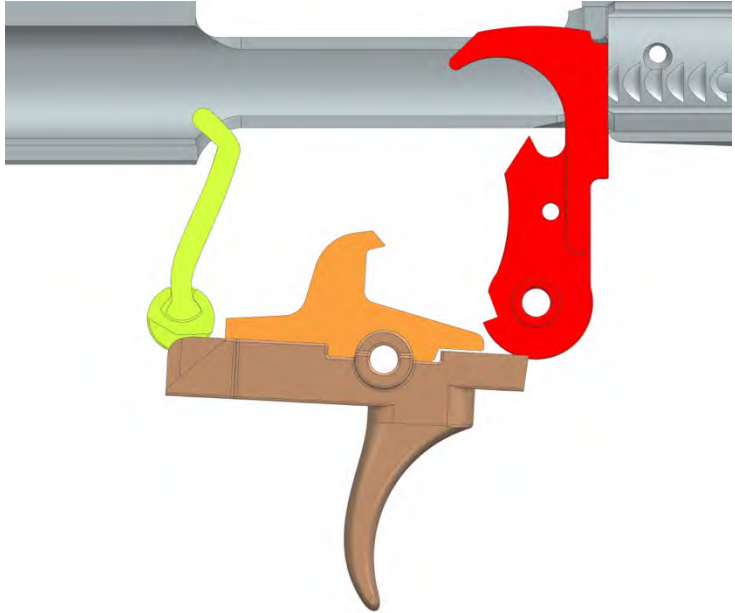
'247 Patent Claim 15	The Super Safety
	 Disconnecter Hook Engaged
and a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,	The Super Safety has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting Super Safety, shown in yellow, in fire control mechanism pocket)  Super Safety Cam with Lobe and Lever
said cam being movable between a first position and a second position, in said second position said cam lobe forces said trigger member towards said set position,	The cam is movable between a first position and a second position.

'247 Patent Claim 15	The Super Safety
	 Cam and Lobe First Position In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.  Cam and Lobe Second Position
whereupon in a standard semi-automatic mode,	During at least part of the cycle in the standard semi-automatic mode,

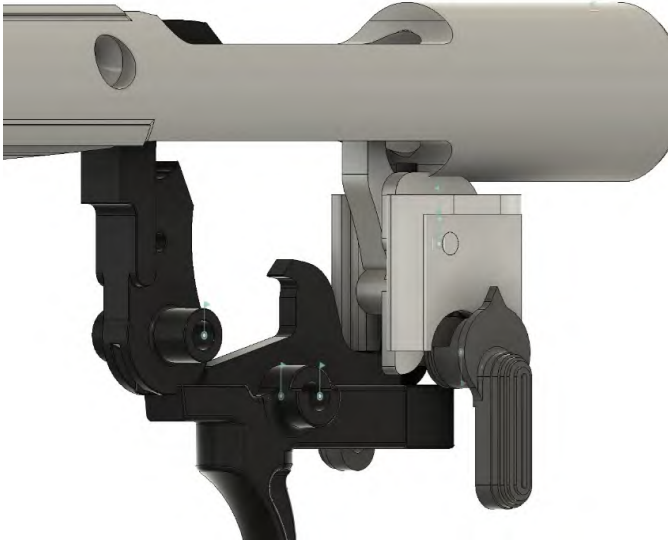
'247 Patent Claim 15	The Super Safety
said cam is in said first position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnecter hook catches said hammer hook,	 ... the cam is in the first position.  Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook. 

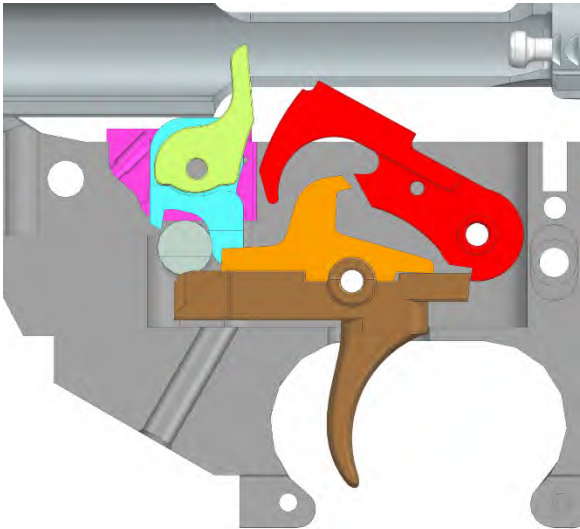
'247 Patent Claim 15	The Super Safety
and thereafter the bolt carrier moves forward into battery, at which time a user must manually release said trigger member to free said hammer from said disconnector to permit said hammer and trigger member to pivot to said set positions so that the user can pull said trigger member to fire the firearm, and	Thereafter, the bolt carrier moves forward into battery,  ... at which time a user must manually release the trigger member (brown) to free said hammer (red) from the disconnector (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm. 
whereupon in a forced reset semi-automatic mode,	When in the “forced reset” semi-automatic mode,

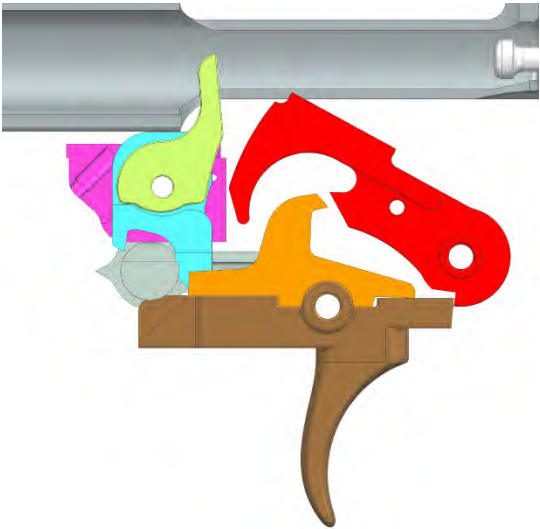
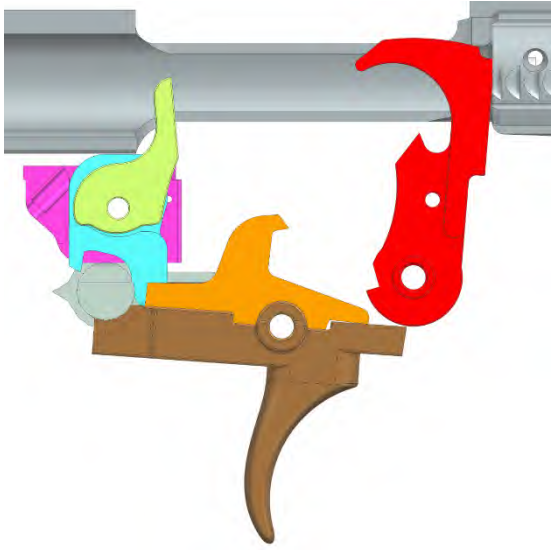
'247 Patent Claim 15	The Super Safety
said cam is in said second position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnecter hook is prevented from catching said hammer hook,	 . . . the cam is in the second position during at least part of the cycle and mechanically moves the trigger member toward the set position. Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook is prevented from catching the hammer hook. 
and thereafter the bolt carrier moves forward into battery,	Thereafter, the bolt carrier moves forward into battery,

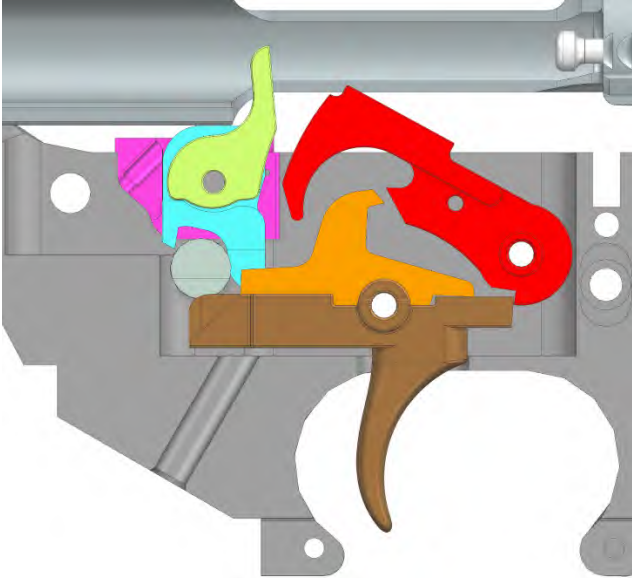
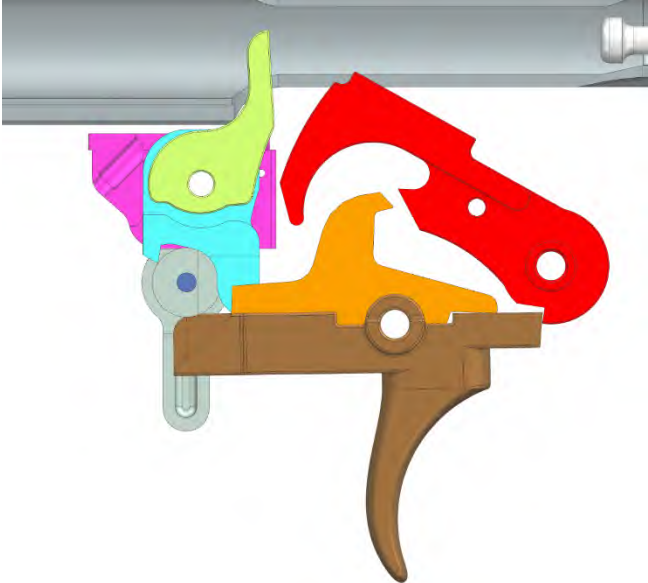
'247 Patent Claim 15	The Super Safety
	
at which time the user can pull said trigger member to fire the firearm.	. . . at which time the user can pull the trigger member (brown) to fire the firearm. 

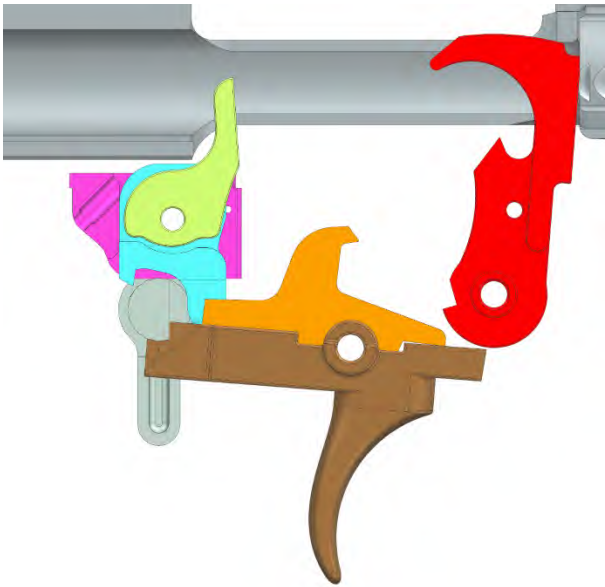
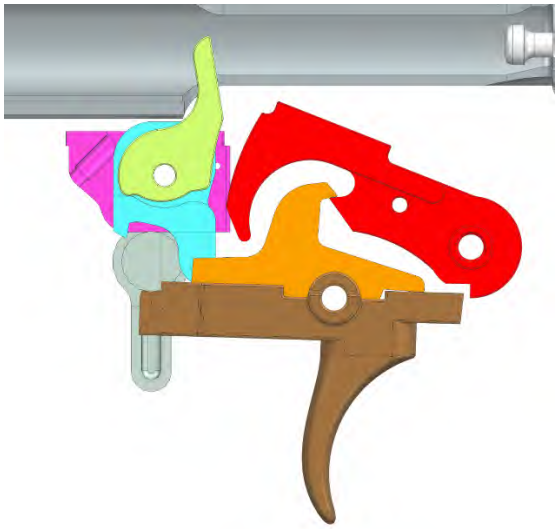
49. An exemplary comparison of the ARSS15, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

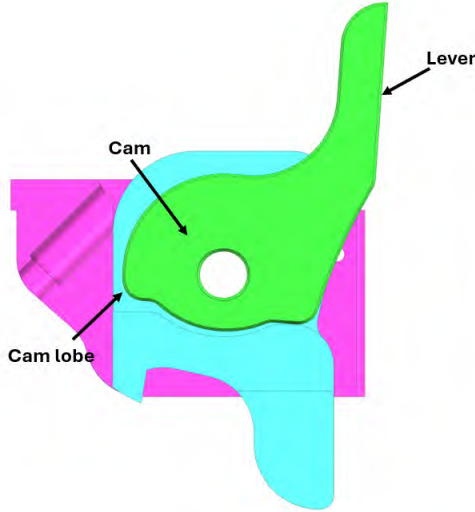
'247 Patent Claim 15	The ARSS15
15. A firearm trigger mechanism comprising:	When installed and used as directed, the ARSS15 is part of a reset trigger mechanism and functions as a cam that in at least one mode, both causes the reset of the trigger and locks the trigger during the cycle of operation.  https://www.bssquirts.store/product/arss15-drop-in/  ARSS15

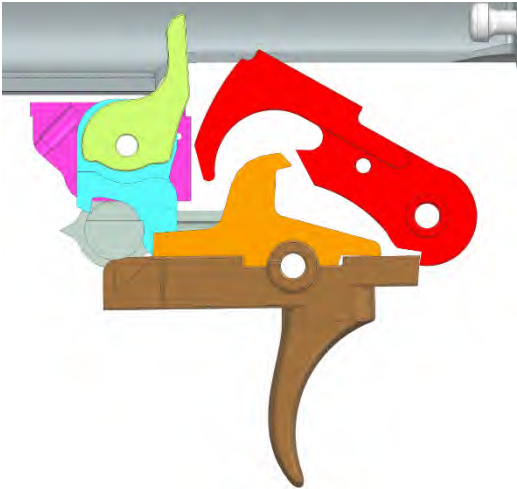
'247 Patent Claim 15	The ARSS15
a hammer having a sear catch and a hook for engaging a disconnector and adapted to be mounted in a fire control mechanism pocket of a receiver	The ARSS15 (green, blue, and purple) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear catch and a hook for engaging a disconnector (orange).  (Plaintiff-generated renderings of ARSS15 here and below)

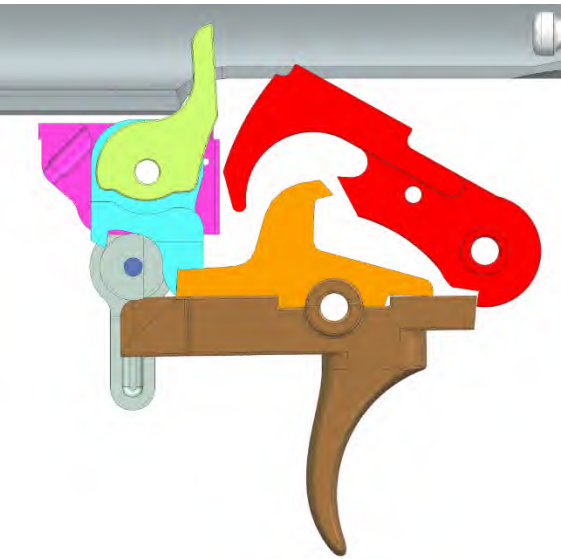
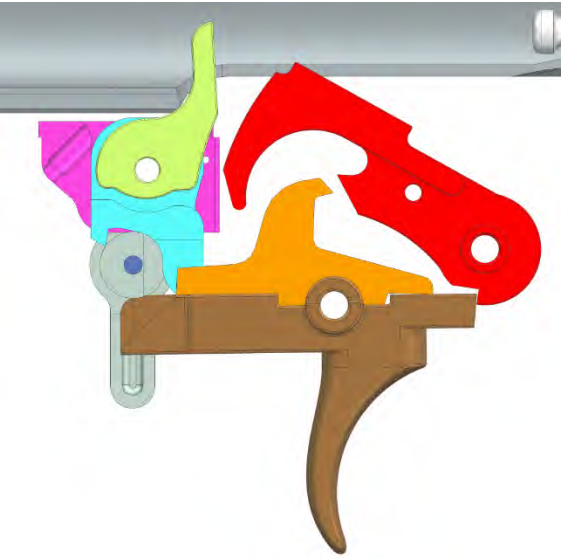
'247 Patent Claim 15	The ARSS15
to pivot on a transverse hammer pivot axis between set and released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt carrier. A 3D perspective diagram showing the hammer in its set position. The hammer is red and is pivoted forward, with its tip pointing towards the left. It is mounted on a transverse pivot axis. Other components shown in different colors include a blue bolt carrier, a yellow sear, and a brown trigger. The hammer's tip is positioned to strike the primer of a cartridge. Hammer Set Position A 3D perspective diagram showing the hammer in its released position. The hammer is red and is pivoted rearward, away from the bolt carrier. It is mounted on the same transverse pivot axis. The other components (blue bolt carrier, yellow sear, brown trigger) remain in the same relative positions as in the set position diagram. Hammer Released Position

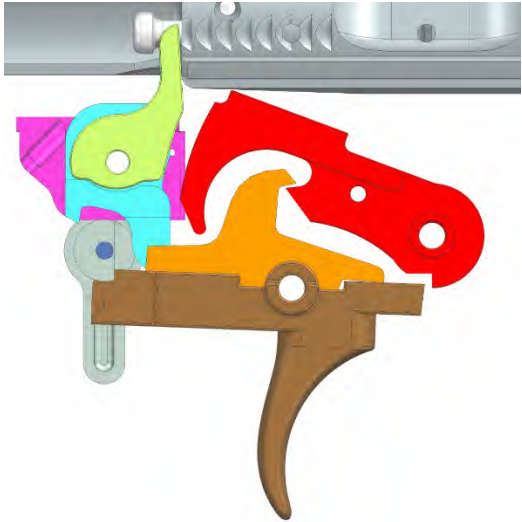
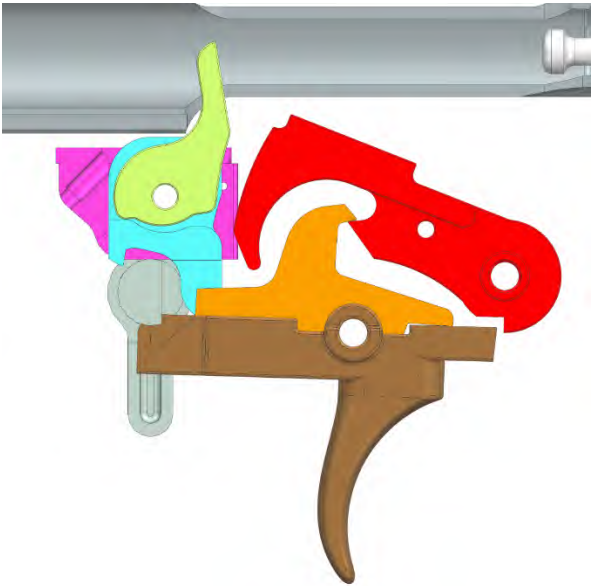
'247 Patent Claim 15	The ARSS15
a trigger member having a sear and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and released positions,	The ARSS15 (green, blue, and purple) is installed with a trigger member (brown) in the fire control mechanism pocket and the trigger member pivots on a transverse trigger member pivot axis between set and released positions. The trigger member (brown) has a sear. 
wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member	The sear of the trigger member (brown) and sear catch of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.  Trigger Member Set Position

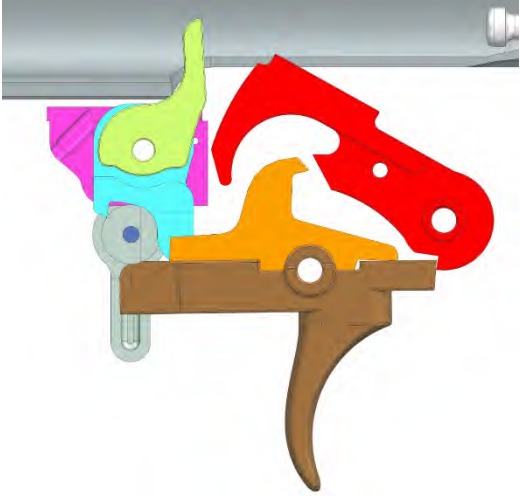
'247 Patent Claim 15	The ARSS15
and are out of engagement in said released positions of said hammer and trigger member,	The sear of the trigger member (brown) and sear catch of the hammer (red) are out of engagement in the released position.  The diagram shows a cross-sectional view of a firearm's trigger mechanism. A brown trigger member is in a released position, with its sear disengaged from the hammer's sear catch. The hammer is red, and the trigger member is brown. Other components are shown in various colors: a green sear, a blue disconnector, and a pink hammer flange. The trigger member is pivoted on a transverse axis. Trigger Member Released Position
said disconnector having a hook for engaging said hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnector pivot axis,	The disconnector (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnector pivot axis. The disconnector has a hook for engaging the hammer (red).  The diagram shows a cross-sectional view of the same trigger mechanism, but with the orange disconnector engaged. The disconnector has a hook that is now engaged with the hammer's sear catch, preventing the hammer from striking the trigger member. The trigger member is still brown, and the hammer is still red. The disconnector is orange and is pivoted on a transverse axis. Disconnector Hook Engaged

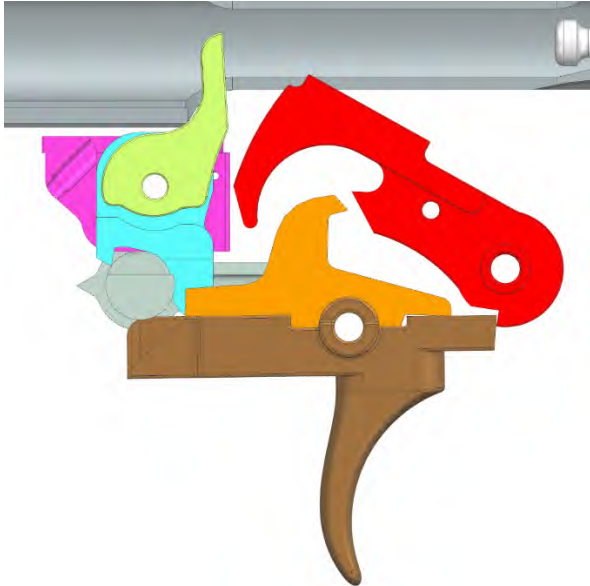
'247 Patent Claim 15	The ARSS15
and a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,	The ARSS15 has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See Image above depicting ARSS15, shown in green, blue, and purple, in fire control mechanism pocket)  The diagram shows a cross-sectional view of a mechanical assembly. A green component, labeled 'Cam', is mounted on a base. A blue component, labeled 'Lever', is attached to the cam. A purple component, labeled 'Cam lobe', is part of the cam assembly. The entire assembly is shown within a pink rectangular frame representing the fire control mechanism pocket. ARSS15 Cam with Lobe and Lever

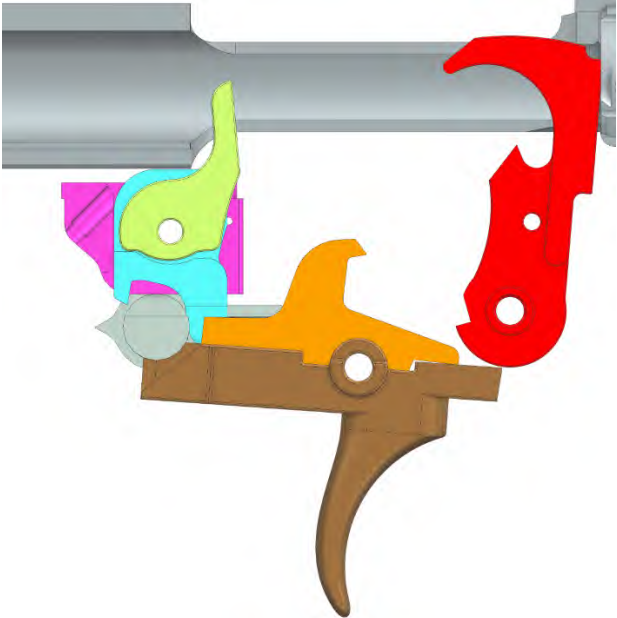
'247 Patent Claim 15	The ARSS15
said cam being movable between a first position and a second position, in said second position said cam lobe forces said trigger member towards said set position,	The cam is movable between a first position and a second position. A 3D perspective diagram showing a mechanical assembly. A green cam lobe is in a retracted position, not touching the trigger member. A blue link connects the cam to a brown trigger member. A red component is also visible. The trigger member is in a retracted position. Cam and Lobe First Position In the second position, the cam (green) lobe moves the trigger member (brown), via a link (blue), toward the set position when the cam is in the “forced reset” semi-automatic mode. A 3D perspective diagram showing the same mechanical assembly as above, but the green cam lobe has moved forward and is now in contact with the brown trigger member, pushing it forward. The blue link is also visible. Cam and Lobe Second Position

'247 Patent Claim 15	The ARSS15
whereupon in a standard semi-automatic mode,	During at least part of the cycle in the standard semi-automatic mode,
	
said cam is in said first position,	. . . the cam (green) is in the first position.
	

'247 Patent Claim 15	The ARSS15
rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnecter hook catches said hammer hook, and thereafter the bolt carrier moves forward into battery,	Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.  Thereafter, the bolt carrier moves forward into battery, 

'247 Patent Claim 15	The ARSS15
at which time a user must manually release said trigger member to free said hammer from said disconnector to permit said hammer and trigger member to pivot to said set positions so that the user can pull said trigger member to fire the firearm, and	. . . at which time a user must manually release the trigger member (brown) to free said hammer (red) from the disconnector (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm.  A 3D perspective diagram of a firearm's internal mechanism. The trigger member is brown and is in a retracted position. The hammer is red and is pivoted upwards. The disconnector is orange and is in a position that allows the hammer to move. Other components are shown in various colors: light green, cyan, magenta, and grey. The entire mechanism is mounted on a brown base.
whereupon in a forced reset semi-automatic mode,	When in the “forced reset” semi-automatic mode,  A 3D perspective diagram of the same firearm mechanism as above, but in a different state. The trigger member (brown) is now extended. The hammer (red) is pivoted downwards. The disconnector (orange) is in a position that prevents the hammer from moving. The other components (light green, cyan, magenta, grey) are in the same positions as in the previous diagram.

'247 Patent Claim 15	The ARSS15
said cam is in said second position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnecter hook is prevented from catching said hammer hook,	. . . the cam is in the second position during at least part of the cycle and moves the trigger member toward the set position. Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook is prevented from catching the hammer hook. 
and thereafter the bolt carrier moves forward into battery,	Thereafter, the bolt carrier moves forward into battery, 

'247 Patent Claim 15	The ARSS15
at which time the user can pull said trigger member to fire the firearm.	. . . at which time the user can pull the trigger member (brown) to fire the firearm. 

50. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '247 patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, installation of, encouraging, advertising, promoting, and instructing others to use and/or how to use the Super Safety and ARSS15.

51. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claim 15 of the '247 Patent.

52. On information and belief, Defendants also contribute to the infringement of the '247 Patent by others, including their customers. Acts by Defendants that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendants of the components of the Super Safety and ARSS15, such as the cam or cam lever arm.

The components are not suitable for substantial noninfringing use as they are specially designed and adapted to be used in a fire control unit to mechanically reset a trigger mechanism and infringe the '247 Patent.

53. Defendants have engaged in egregious infringement behavior with knowledge of the '247 Patent, which has been duly issued by the USPTO, and is presumed valid. On information and belief, Defendants have known or should have known that their actions constituted and continue to constitute infringement of the '247 Patent and that the '247 Patent is valid at least through the service of this complaint. Defendants could not reasonably or subjectively believe that their actions do not constitute infringement of the '247 Patent, nor could they reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants have continued their infringing activities. As such, Defendants willfully infringe the '247 Patent.

54. By their actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '247 Patent pursuant to 35 U.S.C. § 271.

55. By their actions, Defendants' infringement of the '247 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

56. By their actions, Defendants' infringement of the '247 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

57. Defendants' infringement of the '247 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

58. Defendants' acts of infringement are willful and for no other purpose than to deliberately and irreparably harm Plaintiffs' business, sales, reputation, and good-will.

59. Plaintiffs have been substantially harmed by Defendants' infringing activities and are entitled to relief including but not limited to a preliminary injunction, a permanent injunction, damages adequate to compensate for the infringement, being lost profits or no less than a reasonable royalty, treble damages, and attorneys' fees.

COUNT II — INFRINGEMENT OF THE '784 PATENT

60. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

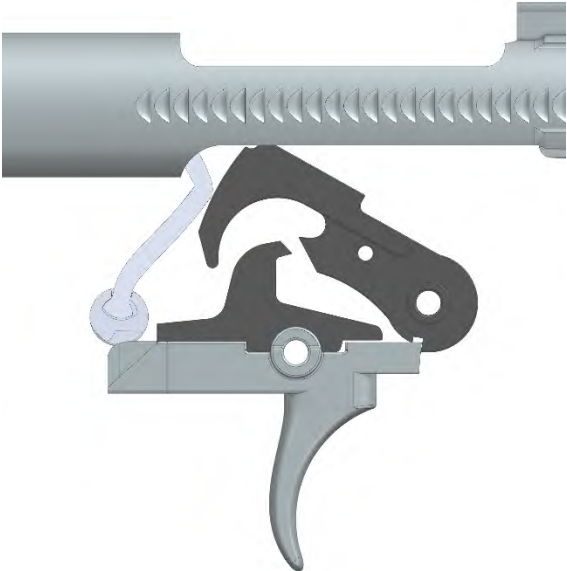
61. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '784 patent. Such unlicensed products include the Super Safety and ARSS15.

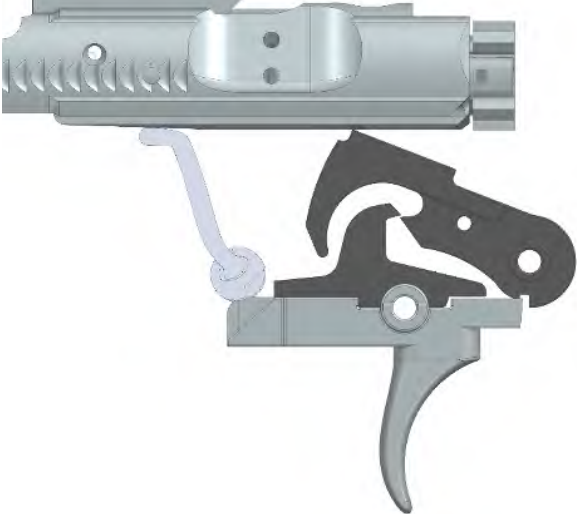
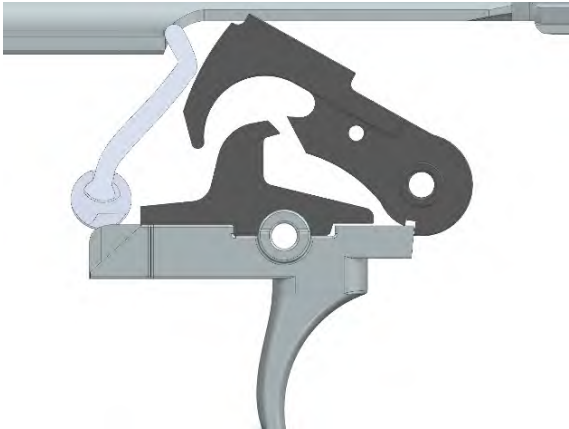
62. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

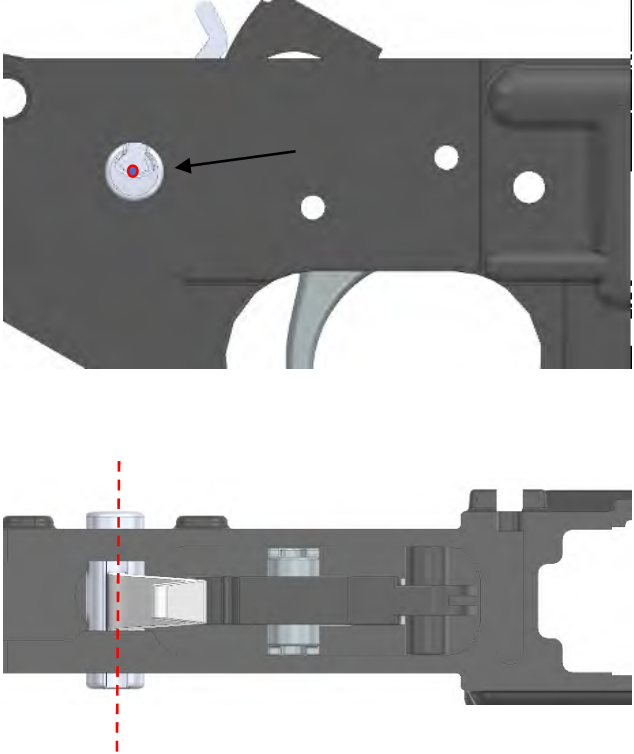
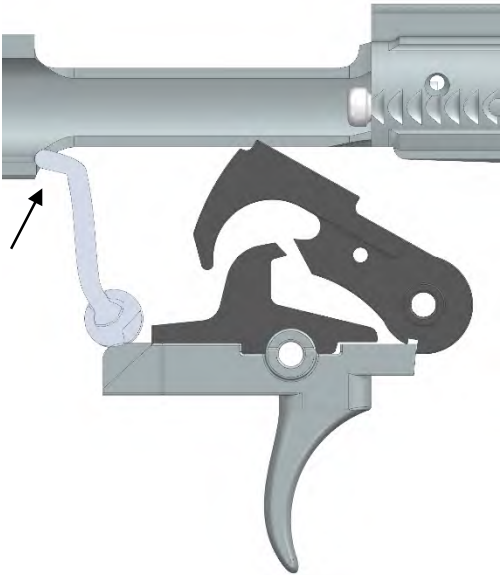
63. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

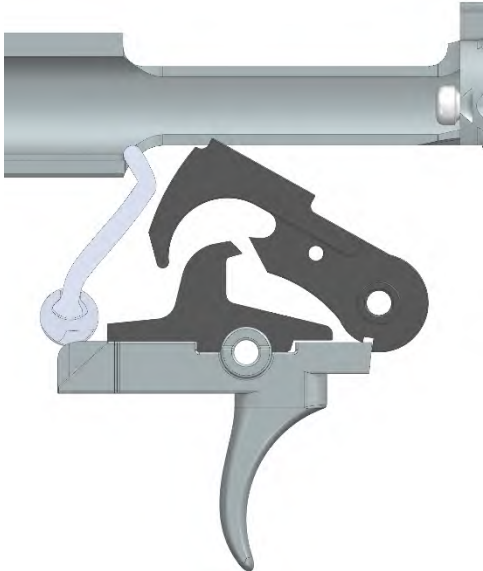
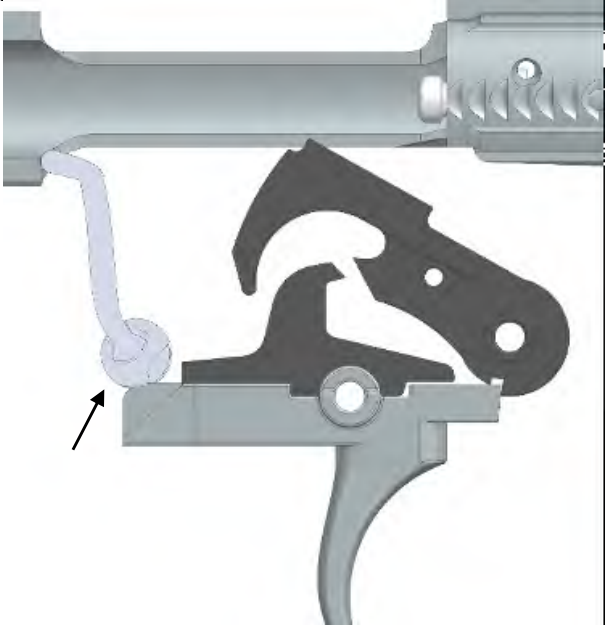
Claim 1: Language	Infringing Device (Super Safety)
1. In a forced reset trigger mechanism, an extended trigger member locking device, comprising:	When installed and used as directed, the Super Safety is part of a forced reset trigger mechanism and functions as an extended trigger member locking device.

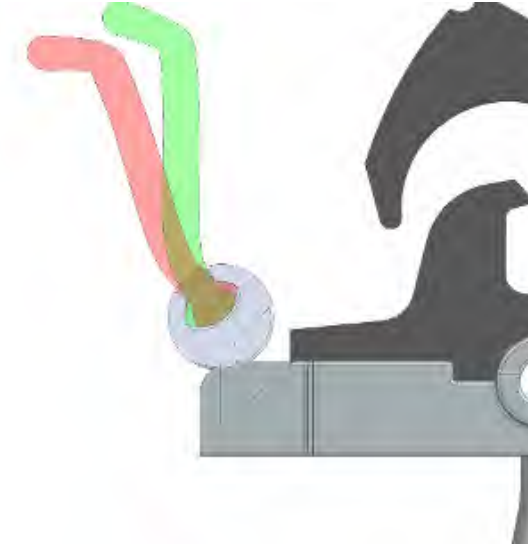
Claim 1: Language	Infringing Device (Super Safety)
	 https://www.bssquirts.store/product-category/hoffman-advance-safety/  Super Safety Ex. F, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12

Claim 1: Language	Infringing Device (Super Safety)
	 Super Safety Installed (Plaintiff-generated renderings of Super Safety here and below; Locking member and bolt carrier shown here and below in section view for clarity) “The Super Safety is a mechanism that actively resets the trigger of a firearm to allow the operator to fire again, quickly, and efficiently. The Super Safety has been designed to operate with AR-15 pattern firearms that use a mil-spec bolt carrier and fire control group.” Ex. F, Super Safety Guide at 1.
a locking member that is movable between a first position in which it locks a trigger against pulling movement	The Super Safety operates as a locking member and has a first position in which the Super Safety locks the trigger member against pulling movement.

Claim 1: Language	Infringing Device (Super Safety)
	 Locked First Position
and a second position where it does not restrict movement of the trigger member,	The Super Safety is moveable from the first position to a second position where it does not restrict movement of the trigger member.  Unlocked Second Position
the locking member configured to be movably supported by a frame	The Super Safety is movably (pivotally about the axis depicted below) supported by a frame (the lower receiver).

Claim 1: Language	Infringing Device (Super Safety)
	
and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,	The Super Safety has an upward extending portion (lever arm) configured to make actuating contact with a surface of the bolt carrier. 
such actuating contact causing the locking member to move from the first position to the second position,	The actuating contact causes the locking member to move from the first position to the second position.

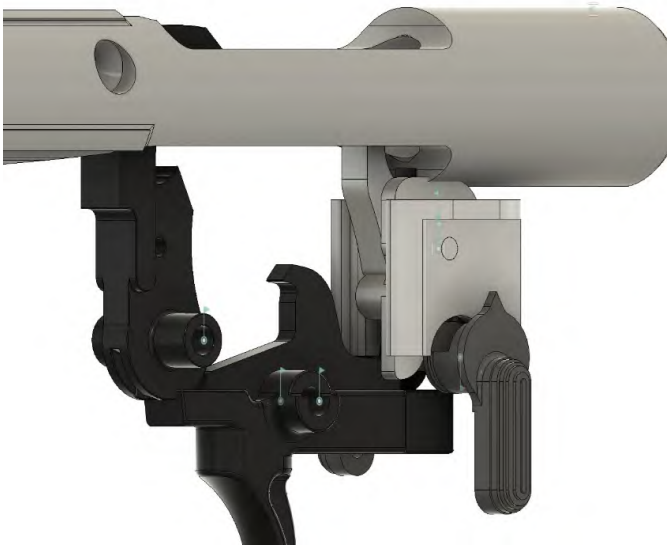
Claim 1: Language	Infringing Device (Super Safety)
	 Unlocked Second Position
the locking member having a body portion that is movably supported	The Super Safety has a body portion that is movably supported by the lower receiver. 
and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position	The Super Safety has an upwardly extending deflectable portion (lever arm). The dovetail connection is designed to allow separate movement of the lever arm relative to the body portion between one position (depicted in red) where it is extended and

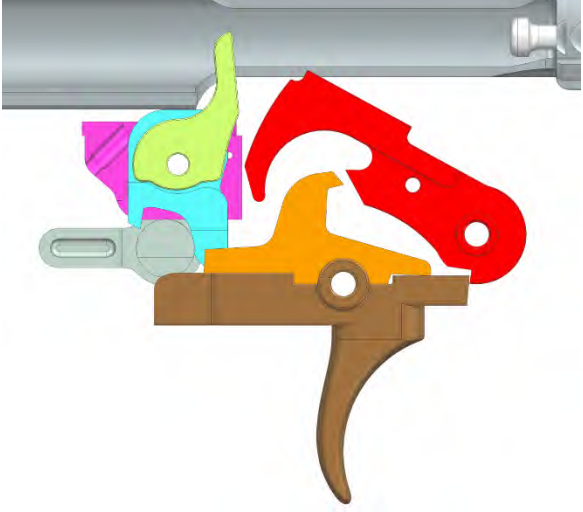
Claim 1: Language	Infringing Device (Super Safety)
	another position where it is deflected (depicted in green).  Below illustrates the upward extending deflectable portion's (lever arm) total separate travel with an overlay of the lever in both positions without the body portion moving.  “The dovetail joint does not immediately transfer torque from the lever to the cam. The lever pivots in the cam until the void is filled. Once the void is filled the hammer can transfer torque to the cam via the upper and lower contact surfaces and. Note that the void, the lower contact surface, and the upper contact

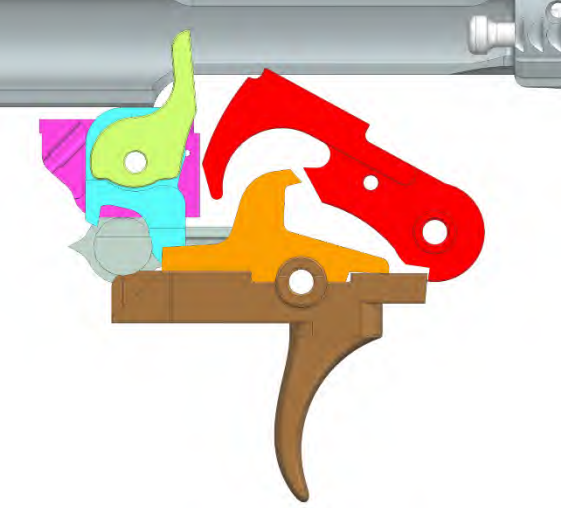
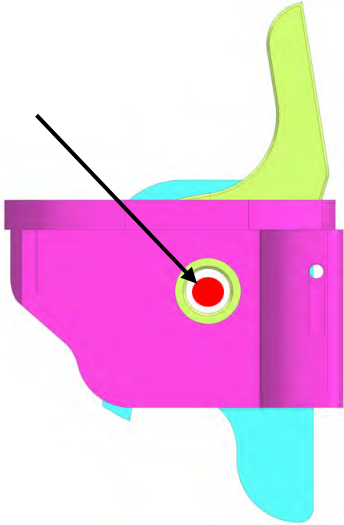
Claim 1: Language	Infringing Device (Super Safety)
	surface, are shown on arbitrary sides of the dovetail, these features may be on either side of the dovetail depending on which direction the lever is moving. The amount that the lever rotates in the dovetail before transferring torque to the cam is such that as the bolt carrier completes its forward movement, the cam rotates the neutral surface away from the cam follower and to a point where the cam follower begins to slide against the cam surface.” (reference numerals omitted for clarity). Ex. F, Super Safety Guide at 4. https://www.scribd.com/document/843484122/Super-Safety-Documentation
and a deflected position.	The lever is now shown deflected independent of the body. 

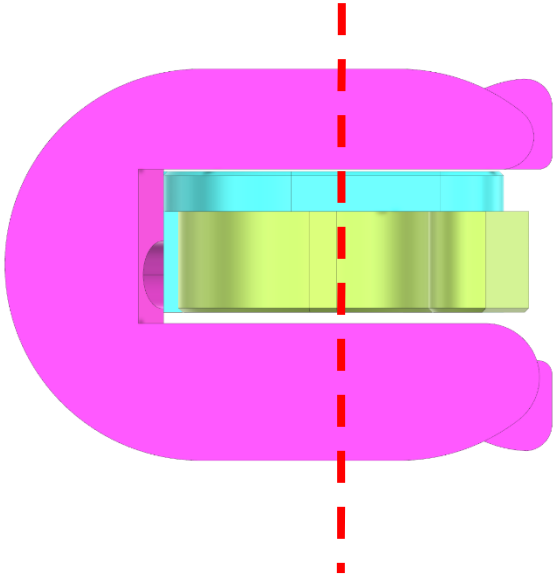
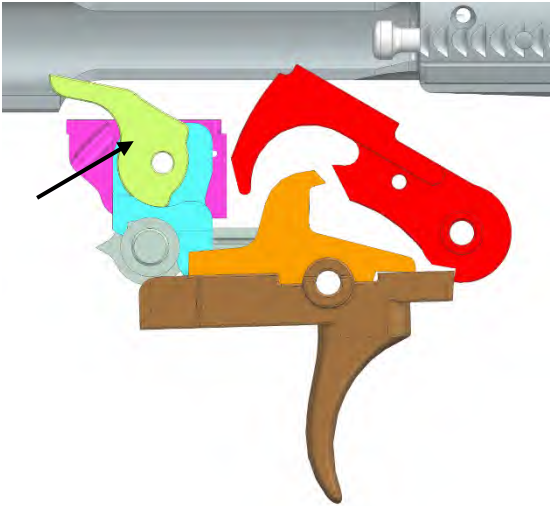
64. An exemplary comparison of the ARSS15, when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

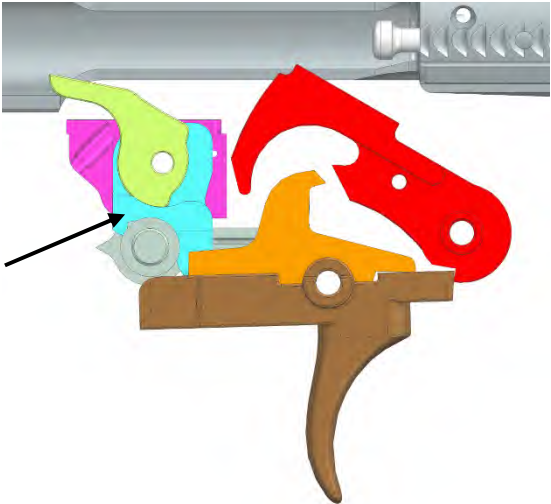
'784 Patent Claim 1	The ARSS15
1. In a forced reset trigger mechanism, an extended trigger member locking device, comprising:	When installed and used as directed, the ARSS15 is part of a reset trigger mechanism and functions as an extended trigger member locking device.

'784 Patent Claim 1	The ARSS15
	 https://www.bssquirts.store/product/arss15-drop-in/  The ARSS15

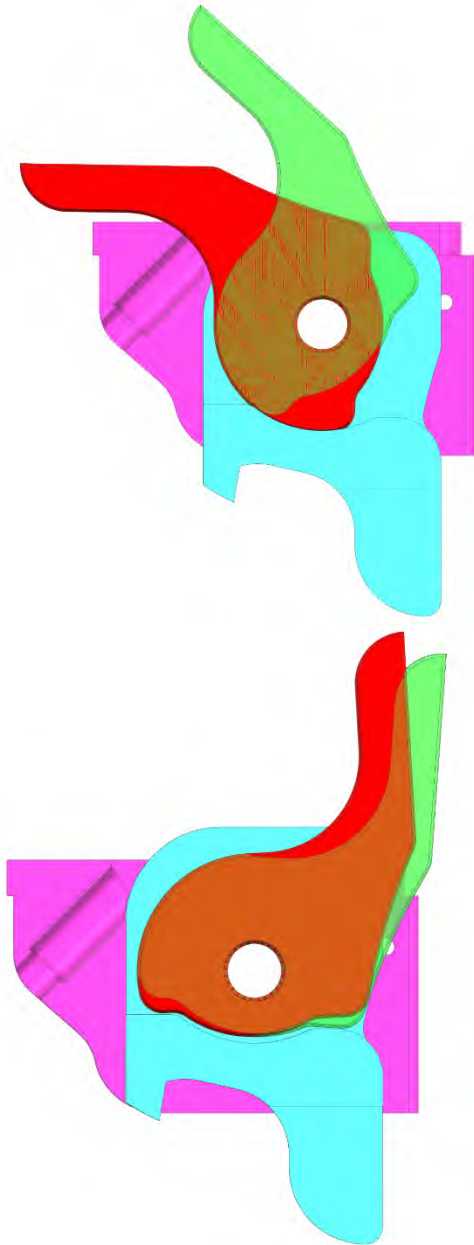
'784 Patent Claim 1	The ARSS15
	 ARSS15 Installed (Plaintiff-generated renderings of ARSS15 here and below)
a locking member that is movable between a first position in which it locks a trigger against pulling movement	The ARSS15 (yellow, blue, and purple) operates as a locking member and has a first position in which the ARSS15 locks the trigger member against pulling movement.  Locked First Position
and a second position where it does not restrict movement of the trigger member,	The ARSS15 (yellow, blue, and purple) is moveable from the first position to a second position where it does not restrict movement of the trigger member.

'784 Patent Claim 1	The ARSS15
	 Unlocked Second Position
the locking member is configured to be movably supported by a frame	The ARSS15 (yellow, blue, and purple) is movably (pivotally about the axis depicted below) supported by a frame (purple). 

'784 Patent Claim 1	The ARSS15
	
and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,	The ARSS15 (yellow, blue, and purple) has an upward extending portion (the “lever arm,” yellow) configured to make actuating contact with a surface of the bolt carrier. 
such actuating contact causing the locking member to move from the first position to the second position,	The actuating contact causes the locking member to move from the first position to the second position.

'784 Patent Claim 1	The ARSS15
	 Unlocked Second Position
the locking member having a body portion that is movably supported	The ARSS15 (yellow, blue, and purple) has a body portion (blue) that is movably supported by a housing (purple). 
and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position and a deflected position.	The ARSS15 (yellow, blue, and purple) has an upwardly extending deflectable portion (lever arm).

'784 Patent Claim 1	The ARSS15
	The below illustrates the lever arm's (upward extending deflectable portion) separate travel with an overlay of the lever in both deflected and extended positions without the body portion moving.

'784 Patent Claim 1	The ARSS15
	

65. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '784 patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, installation of,

encouraging, advertising, promoting, and instructing others to use and/or how to use the Super Safety and ARSS15 while selling products.

66. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claim 1 of the '784 Patent.

67. On information and belief, Defendants also contribute to the infringement of the '784 Patent by others, including their customers. Acts by Defendants that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendants of the components of the Super Safety and ARSS15, such as the cam or cam lever arm. The components are not suitable for substantial noninfringing use as they are specially designed and adapted to be used in a fire control unit to mechanically reset a trigger mechanism and infringe the '784 Patent.

68. Defendants have engaged in egregious infringement behavior with knowledge of the '784 Patent, which has been duly issued by the USPTO, and is presumed valid. On information and belief, Defendants have known or should have known that their actions constituted and continue to constitute infringement of the '784 Patent and that the '784 Patent is valid at least through the service of this complaint. Defendants could not reasonably or subjectively believe that their actions do not constitute infringement of the '784 Patent, nor could they reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants have continued their infringing activities. As such, Defendants willfully infringe the '784 Patent.

69. By their actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '784 Patent pursuant to 35 U.S.C. § 271.

70. By their actions, Defendants' infringement of the '784 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

71. By their actions, Defendants' infringement of the '784 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

72. Defendants' infringement of the '784 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

73. Defendants' acts of infringement are willful and for no other purpose than to deliberately and irreparably harm Plaintiffs' business, sales, reputation, and good-will.

74. Plaintiffs have been substantially harmed by Defendants' infringing activities and are entitled to relief including but not limited to a preliminary injunction, a permanent injunction, damages adequate to compensate for the infringement, being lost profits or no less than a reasonable royalty, treble damages, and attorneys' fees.

COUNT III — INFRINGEMENT OF THE '538 PATENT

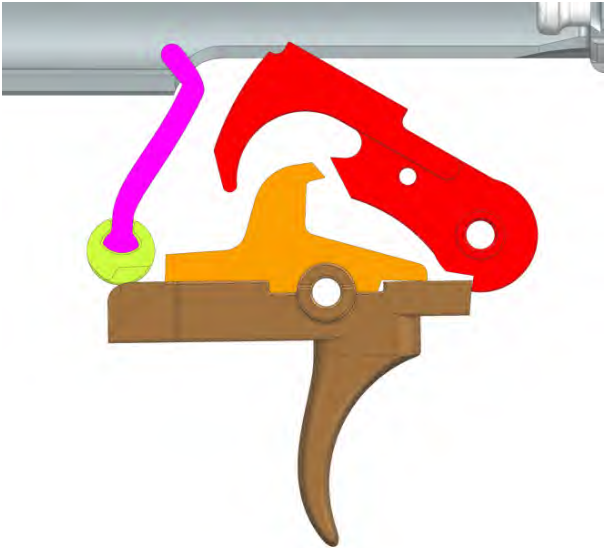
75. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

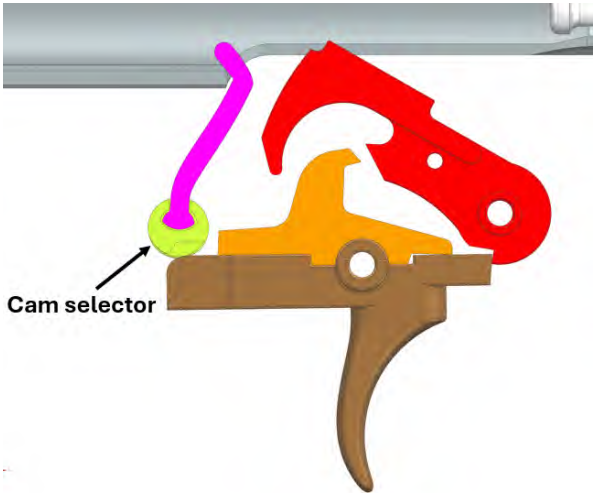
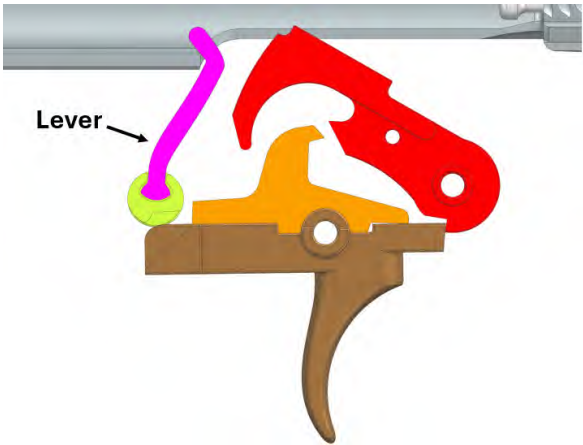
76. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '538 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '538 patent. Such unlicensed products include the Super Safety.

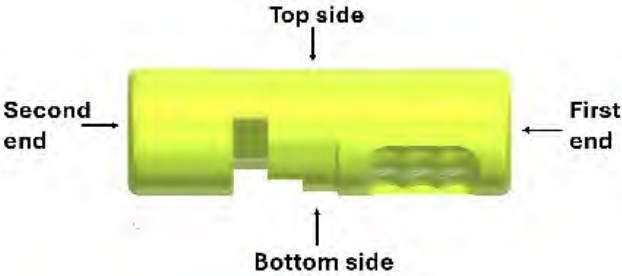
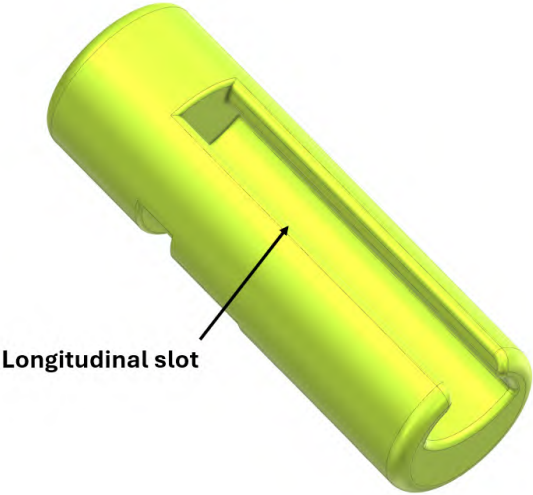
77. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '538 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

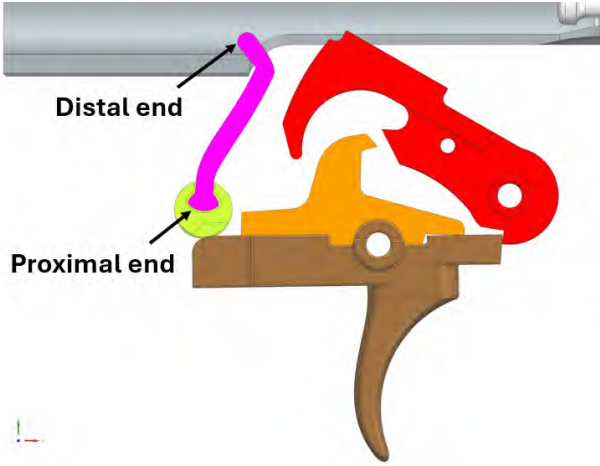
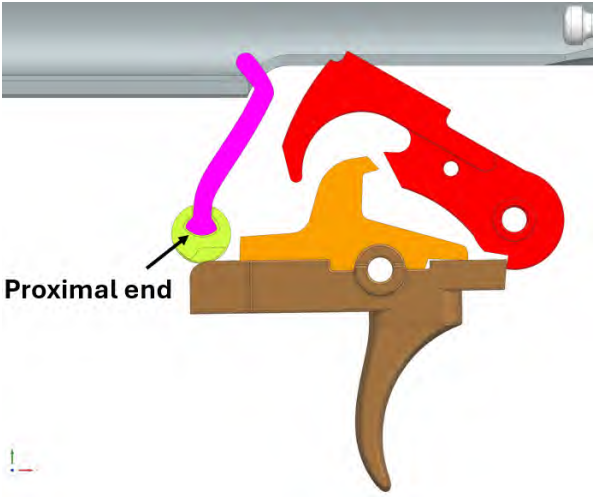
78. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '538 Patent is illustrated in the chart below:

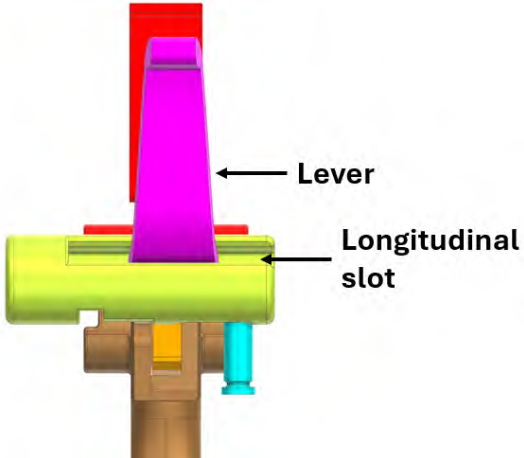
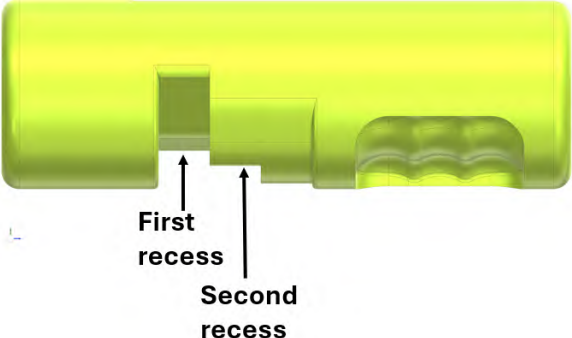
'538 Patent Claim 1	The Super Safety
1. A safety mechanism for a firearm comprising:	The Super Safety is part of a trigger mechanism installed into a firearm receiver in place of a standard safety.  https://www.bssquirts.store/product-category/hoffman-advance-safety/

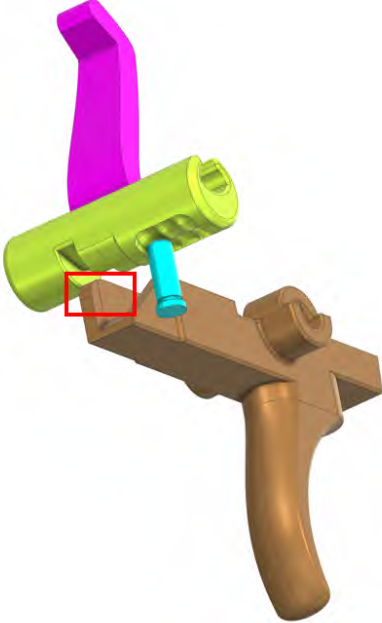
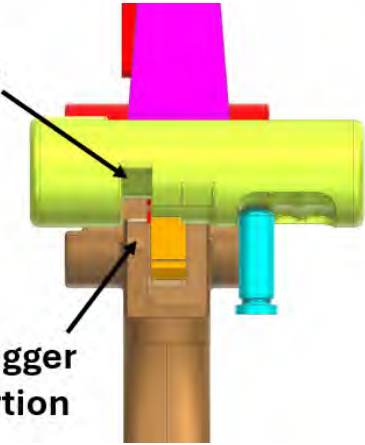
'538 Patent Claim 1	The Super Safety
	 Super Safety Ex. F, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12.  Super Safety Installed (Plaintiff-generated renderings of Super Safety here and below; cam selector and bolt carrier shown in section view for clarity)
a cam selector;	The Super Safety includes a dual mode cam selector that allows for selection of safe, active reset, and passive reset modes.

'538 Patent Claim 1	The Super Safety
	 Dual Mode Cam Selector Ex. F, Super Safety Guide at 1  Cam selector
a lever;	The Super Safety has a lever (pink) extending upward from the cam selector.  Lever

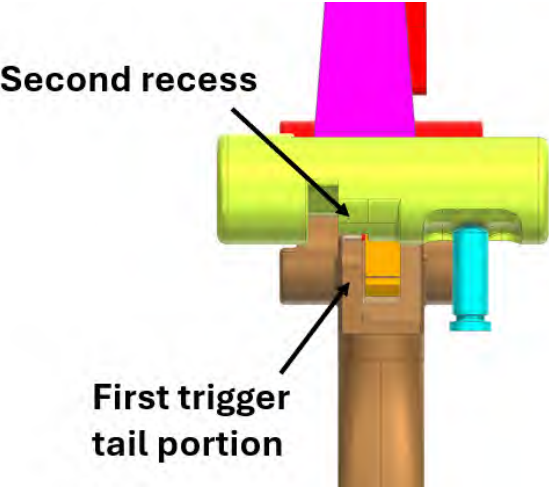
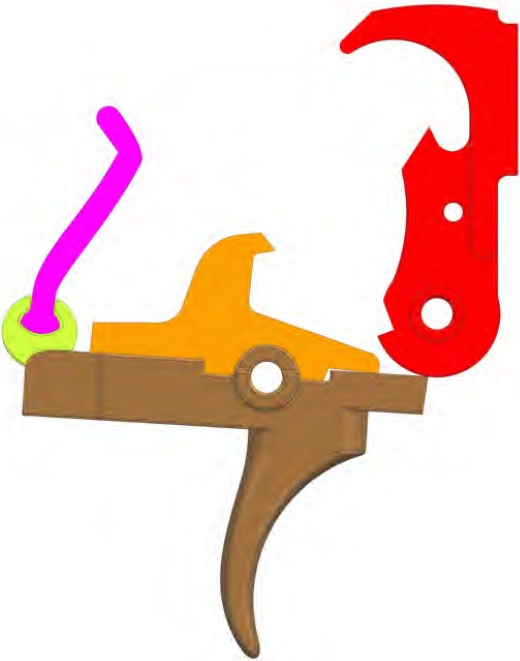
'538 Patent Claim 1	The Super Safety
a trigger;	The cam selector operates on a trigger. (brown) 
the cam selector comprising a first end, a second end, a top side, and a bottom side;	The Super Safety dual mode cam selector has two ends, a top side, and a bottom side as illustrated below. 
the cam selector comprising a longitudinal slot positioned on the top side of the cam selector;	The Super Safety dual mode cam selector comprises a longitudinal slot that is positioned on the top side and extends along the cam selector. 

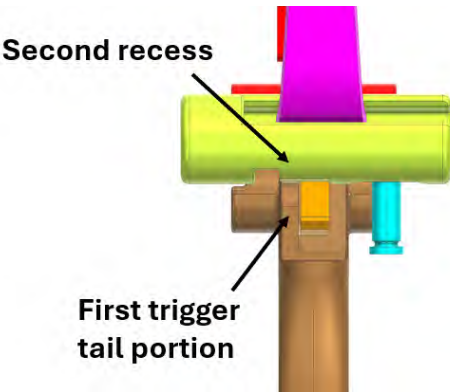
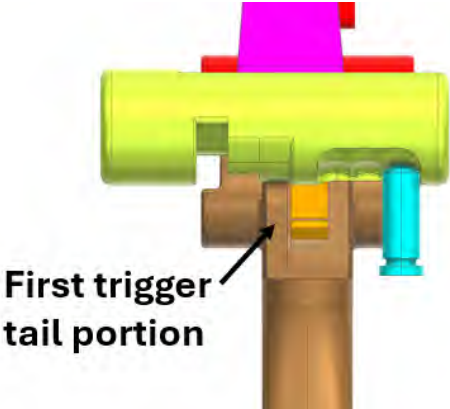
'538 Patent Claim 1	The Super Safety
the lever comprising a proximal end and a distal end;	The Super Safety lever (pink) has a proximal end and a distal end, as illustrated below. 
the longitudinal slot being configured to receive the proximal end of the lever;	The longitudinal slot on the top side of the cam selector (yellow) is configured to receive the proximal end of the lever (pink).  Ex. F, Super Safety Guide at 12 

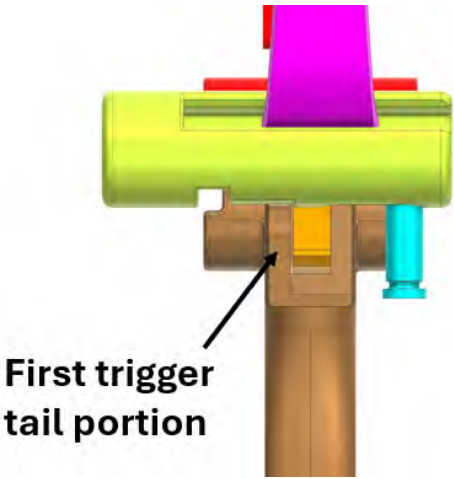
'538 Patent Claim 1	The Super Safety
	 Super Safety Installed
the cam selector further comprising a first recess and a second recess on the bottom side of the cam selector;	The Super Safety dual mode cam selector has a first recess and a second recess on the bottom side of the cam.  First recess Second recess
the trigger comprising a first trigger tail portion;	The Super Safety dual mode trigger has a first trigger tail portion, shown in the red box below.  Ex. F, Super Safety Guide at 10.

'538 Patent Claim 1	The Super Safety
	
the cam selector being configured to operate between a first mode, a second mode, and a third mode;	The Super Safety dual mode cam is operable in three modes: (1) passive reset (standard semi-automatic) (2) active reset, and (3) safe. Ex. F, Super Safety Guide at 1.
wherein the first mode of the cam selector is configured to allow the first trigger tail portion to be movable within the first recess,	The Super Safety dual mode cam selector is operable in standard semi-automatic mode, in which the first trigger tail aligns with the first recess of the cam.  First recess First trigger tail portion Standard Semi-Automatic Mode When the cam selector is in the first mode, the first trigger tail portion is movable within the first recess of the cam.

'538 Patent Claim 1	The Super Safety
	 Super Safety Installed  First recess First trigger tail portion Super Safety Installed, Trigger Pulled, Lever and Cam Rotated

'538 Patent Claim 1	The Super Safety
wherein the second mode of the cam selector is configured to allow the first trigger tail portion to engage the second recess	The Super Safety dual mode cam selector is operable in active reset mode, in which the first trigger tail aligns with the second recess of the cam.  Second recess First trigger tail portion Active Reset Mode and be moved down by a cam portion of the second recess when the cam selector rotates, In the second mode, when the cam is rotated by the lever, the cam selector portion of the second recess moves the first trigger tail portion down.  Super Safety Installed, Trigger Pulled

'538 Patent Claim 1	The Super Safety
	 Super Safety Installed, Lever and Cam Rotated  Second recess First trigger tail portion
and wherein the third mode of the cam selector is configured to prevent the trigger from being pulled.	The Super Safety dual mode cam is operable in safe mode, in which the first trigger tail portion does not align with a recess in the cam. The trigger is not movable within a recess of the cam, and the cam therefore prevents the trigger from being pulled.  First trigger tail portion

'538 Patent Claim 1	The Super Safety
	

79. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '538 patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, installation of, encouraging, advertising, promoting, and instructing others to use and/or how to use the Super Safety while selling products.

80. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claim 1 of the '538 Patent.

81. On information and belief, Defendants also contribute to the infringement of the '538 Patent by others, including their customers. Acts by Defendants that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendants of the components of the Super Safety, such as the cam or cam lever arm. The components are not suitable for substantial noninfringing use as they are specially designed and adapted to be used in a fire control unit to mechanically reset a trigger mechanism and infringe the '538 Patent.

82. Defendants have engaged in egregious infringement behavior with knowledge of the '538 Patent, which has been duly issued by the USPTO, and is presumed valid. On information and belief, Defendants have known or should have known that their actions constituted and continue to constitute infringement of the '538 Patent and that the '538 Patent is valid at least through the service of this complaint. Defendants could not reasonably or subjectively believe that their actions do not constitute infringement of the '538 Patent, nor could they reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants have continued their infringing activities. As such, Defendants willfully infringe the '538 Patent.

83. By their actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '538 Patent pursuant to 35 U.S.C. § 271.

84. By their actions, Defendants' infringement of the '538 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

85. By their actions, Defendants' infringement of the '538 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

86. Defendants' infringement of the '538 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

87. Defendants' acts of infringement are willful and for no other purpose than to deliberately and irreparably harm Plaintiffs' business, sales, reputation, and good-will.

88. Plaintiffs have been substantially harmed by Defendants' infringing activities and are entitled to relief including but not limited to a preliminary injunction, a permanent injunction,

damages adequate to compensate for the infringement, being lost profits or no less than a reasonable royalty, treble damages, and attorneys' fees.

COUNT IV — INFRINGEMENT OF THE '159 PATENT

89. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

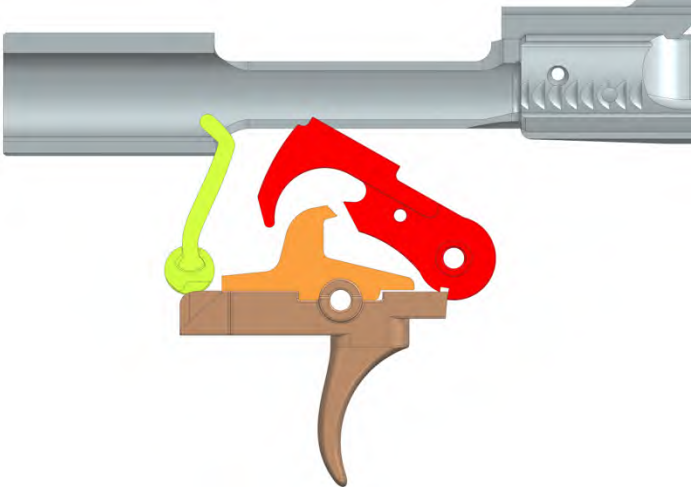
90. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '159 patent. Such unlicensed products include the Super Safety and ARSS15.

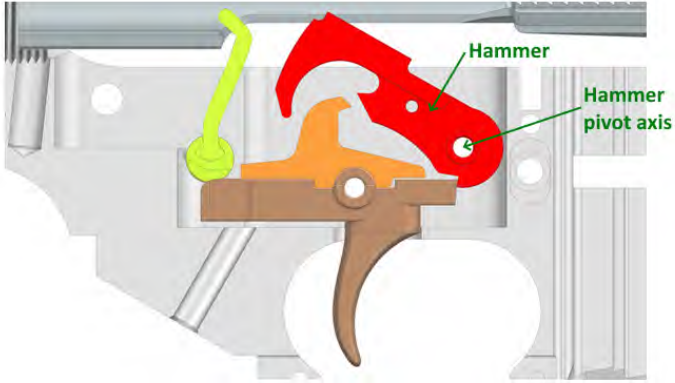
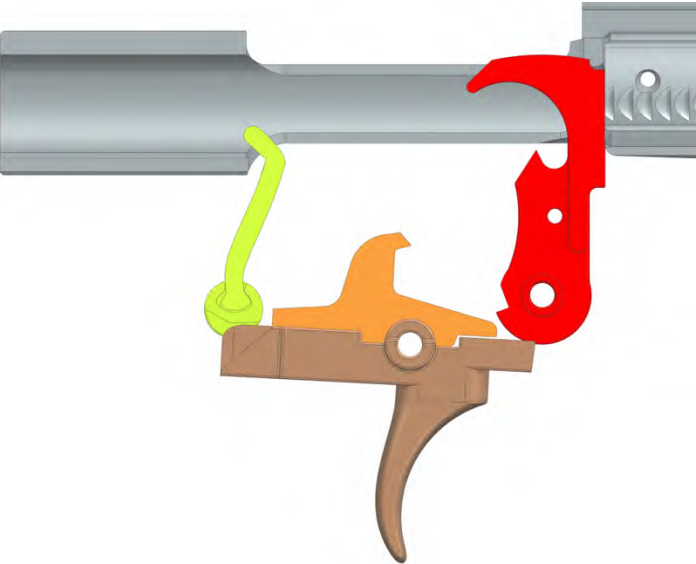
91. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

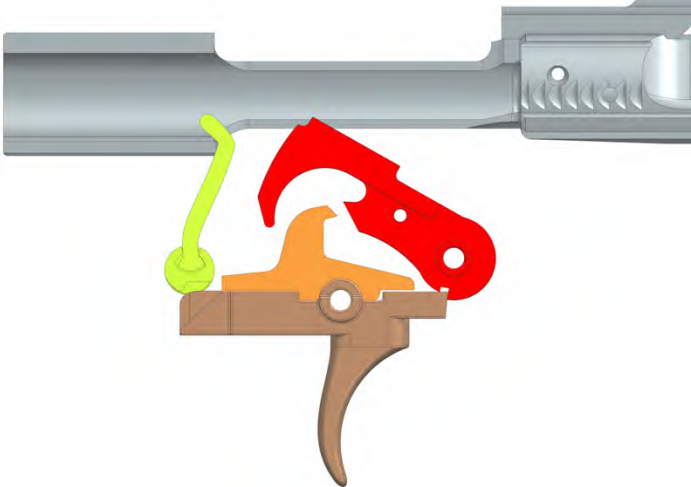
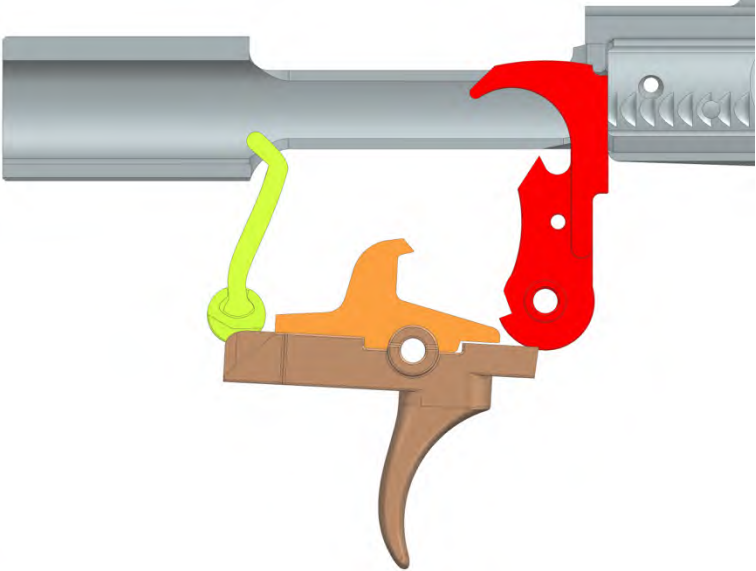
92. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

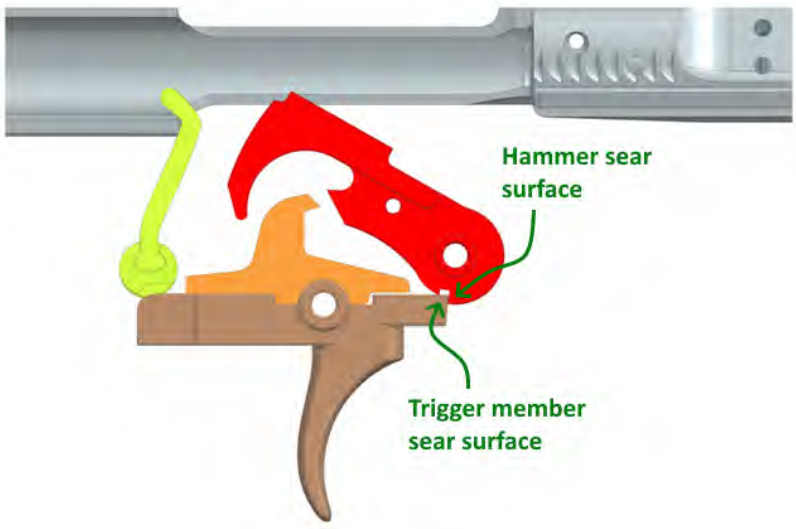
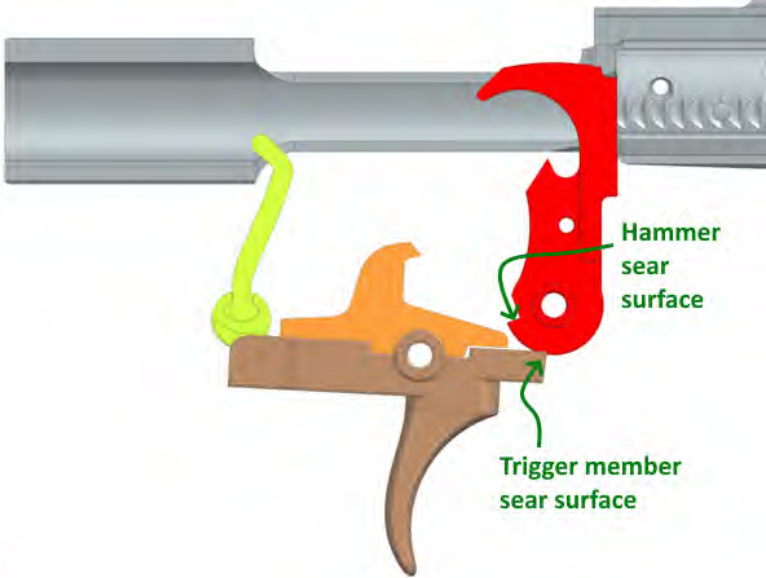
'159 Patent Claim 1	The Super Safety
1. A firearm trigger mechanism for a firearm having a fire control mechanism pocket and a reciprocating bolt means, the trigger mechanism operable in a first, standard semi-automatic mode and in a second, forced reset semi-automatic mode, the mechanism comprising:	When installed and used as directed, the Super Safety is part of a reset trigger mechanism that uses a bolt means. With the Super Safety installed, the trigger mechanism operates in a standard semi-automatic mode and a semi-automatic mode

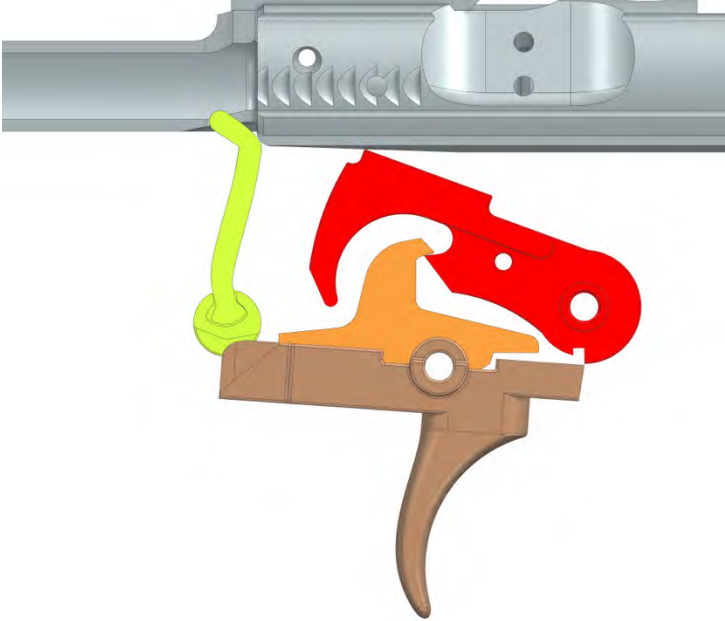
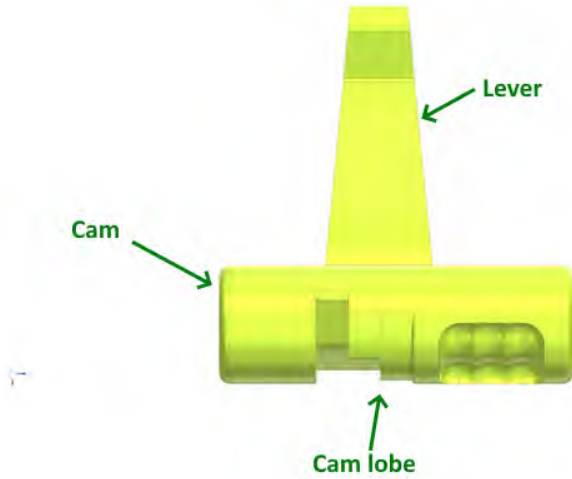
'159 Patent Claim 1	The Super Safety
	 https://www.bssquirts.store/product-category/hoffman-advance-safety/  Super Safety Ex. F, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12

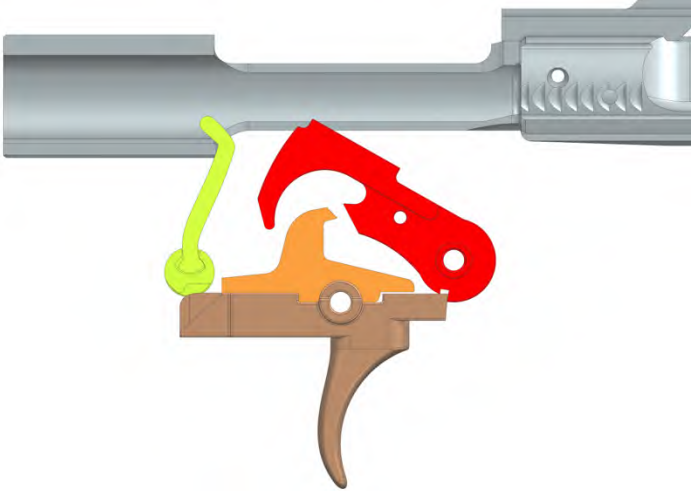
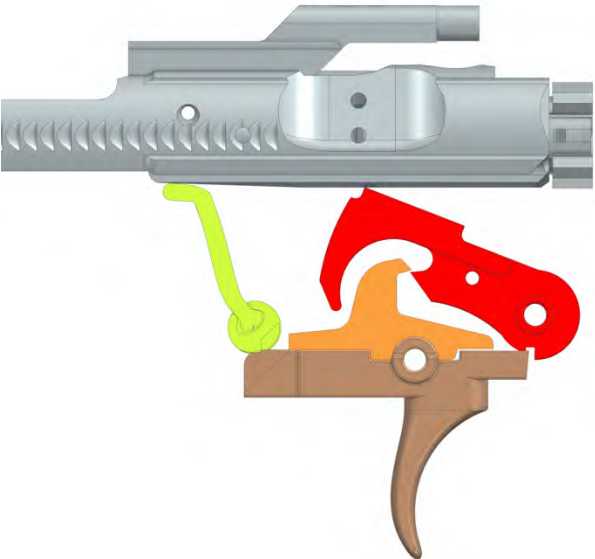
'159 Patent Claim 1	The Super Safety
	 Super Safety (Installed) (Plaintiff-generated renderings of the Super Safety here and below)
a hammer having a sear surface and a hook for engaging a disconnecter and adapted to be mounted in a fire control mechanism pocket of a receiver	The Super Safety (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear surface and a hook for engaging a disconnecter (orange).  Super Safety (Installed)
to pivot on a transverse hammer pivot axis between set and released positions, the hammer adapted to be pivoted rearward by rearward movement of a bolt means,	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt means.

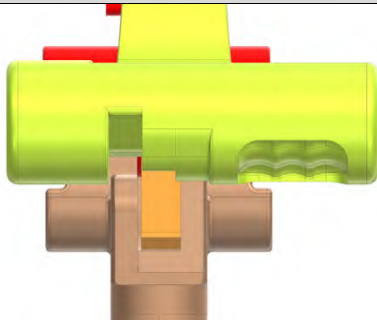
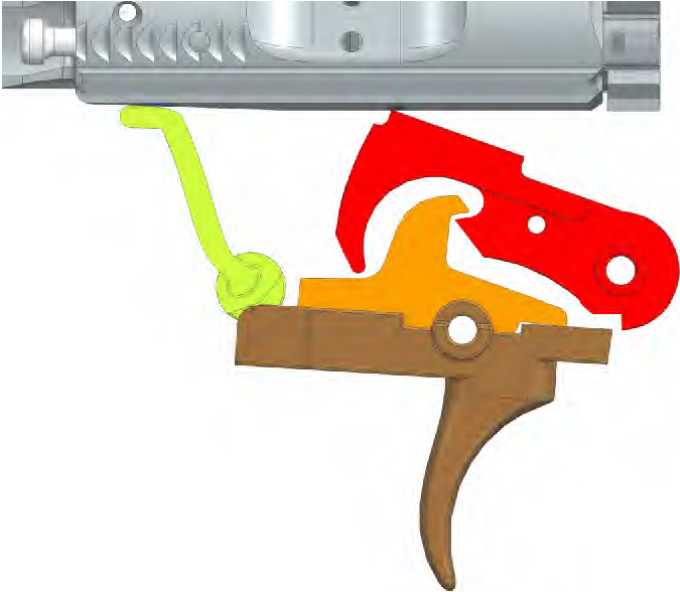
'159 Patent Claim 1	The Super Safety
	 Hammer Set Position  Hammer Released Position
a trigger member having a trigger sear surface and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis	The Super Safety (yellow) is installed with a trigger member (brown) in the fire control mechanism pocket and the trigger member pivots on a transverse trigger member pivot axis between set and released positions. The trigger member has a sear surface.

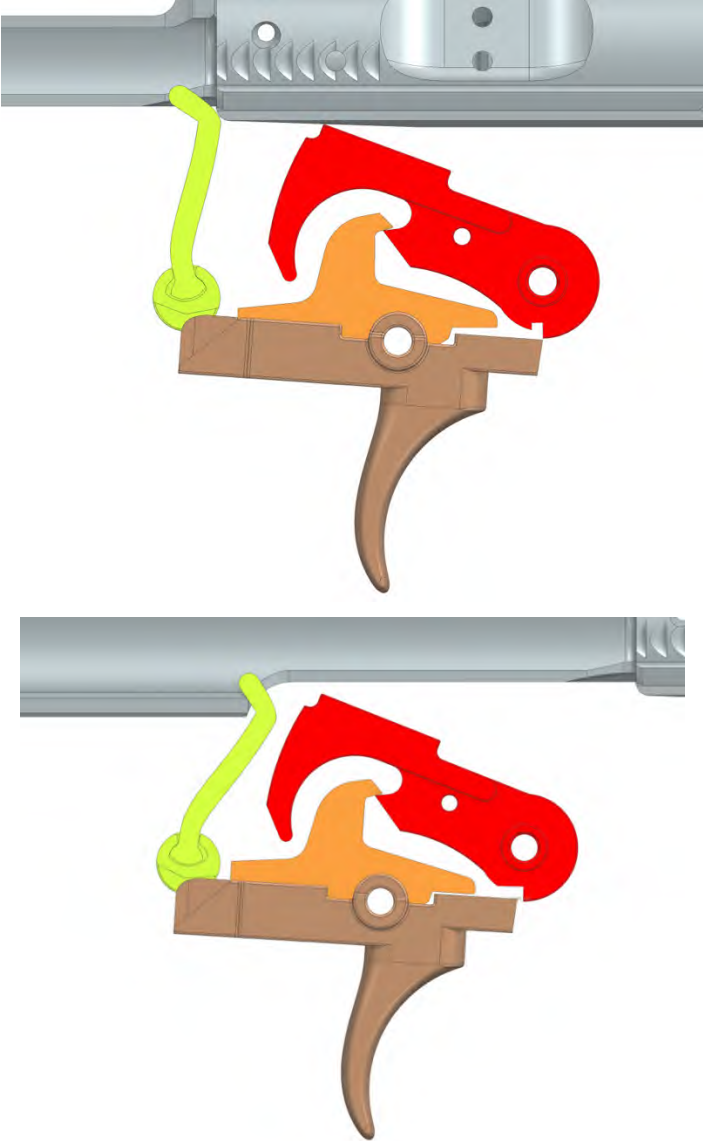
'159 Patent Claim 1	The Super Safety
between set and released positions,	 The diagram shows a cross-section of a firearm's trigger assembly in its set position. A grey hammer is at the top, with a red sear surface. Below it is an orange trigger member with a brown sear surface. A green spring is coiled around the trigger member. The red sear surface of the hammer is engaged with the brown sear surface of the trigger member. Trigger Member Set Position  The diagram shows the same trigger assembly in its released position. The hammer (red) has moved to the right, and the trigger member (orange) has moved upwards. The red sear surface of the hammer is no longer engaged with the brown sear surface of the trigger member. Trigger Member Released Position
wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member	The sear surface of the trigger member (brown) and sear surface of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.

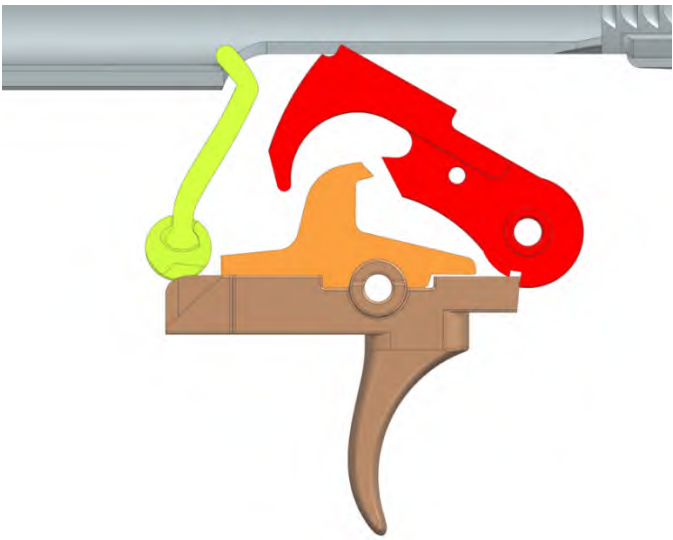
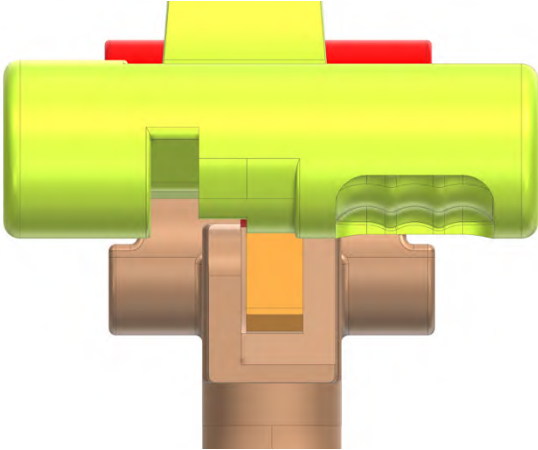
'159 Patent Claim 1	The Super Safety
	 Hammer sear surface Trigger member sear surface Trigger Member and Hammer Member Set Position
and are out of engagement in the released positions of the hammer and trigger member,	The sear surface of the trigger member (brown) and sear catch surface of the hammer (red) are out of engagement in the released position.  Hammer sear surface Trigger member sear surface Trigger Member and Hammer Member Released Positions
the disconnecter having a hook for engaging the hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).

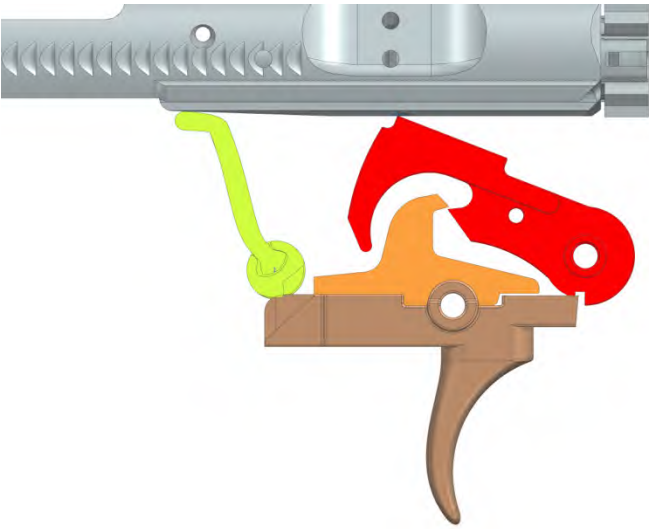
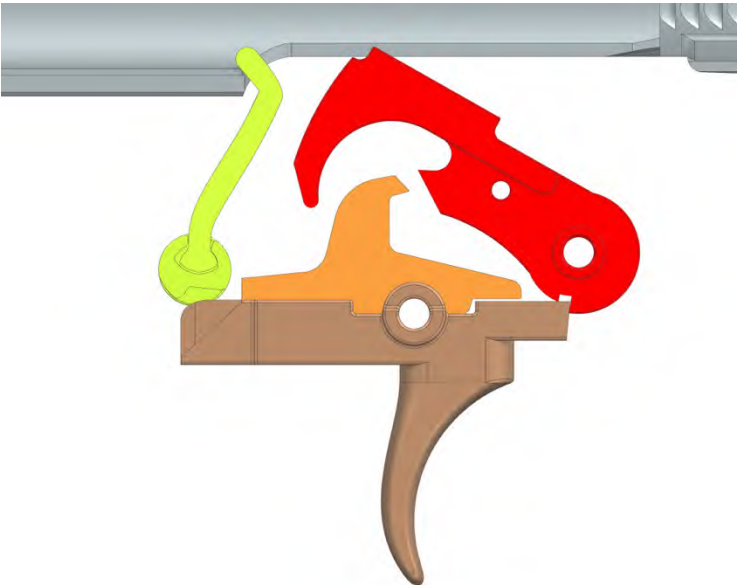
'159 Patent Claim 1	The Super Safety
transverse disconnecter pivot axis, and	 The diagram shows a cross-section of a firearm's fire control mechanism. A yellow hook-shaped component is engaged with a red component, which is part of a larger assembly. The yellow hook is connected to a brown trigger. The red component has a curved, hook-like shape. The entire assembly is mounted on a grey base. Disconnecter Hook Engaged
a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,	The Super Safety has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting Super Safety, shown in yellow, in fire control mechanism pocket)  The diagram shows a yellow cam component with a lever. The lever is a long, thin, curved piece that is pivoted to the cam. The cam has a cam lobe, which is a raised portion of the cam's surface. The lever is shown in a position where it is about to engage the cam lobe. Labels with arrows point to the 'Lever', 'Cam', and 'Cam lobe'. Super Safety Cam with Lobe and Lever
the cam being movable between a first position and a second position, in the second position the cam lobe forces the	The cam is movable between a first position and a second position.

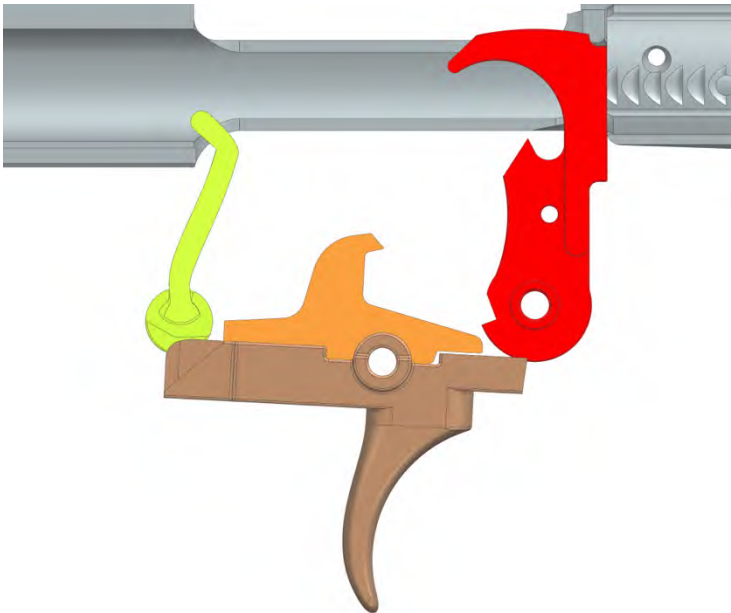
'159 Patent Claim 1	The Super Safety
trigger member toward the set position,	 Cam and Lobe First Position In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.  Cam and Lobe Second Position
whereupon in the first mode,	While in the first (standard semi-automatic) mode,

'159 Patent Claim 1	The Super Safety
	
rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook,	Rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.  Disconnecter Hook Catches the Hammer
and thereafter the bolt means moves forward into battery,	Thereafter, the bolt means moves forward into battery,

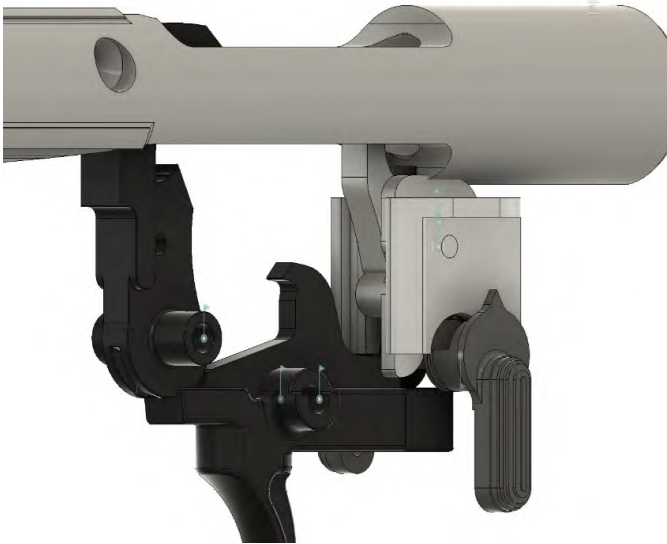
'159 Patent Claim 1	The Super Safety
	 Pressure on Trigger Member Prevents Reset
at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnecter to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger	at which time a user must manually reduce pressure on the trigger member (brown) to free the hammer (red) from the disconnecter (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm.

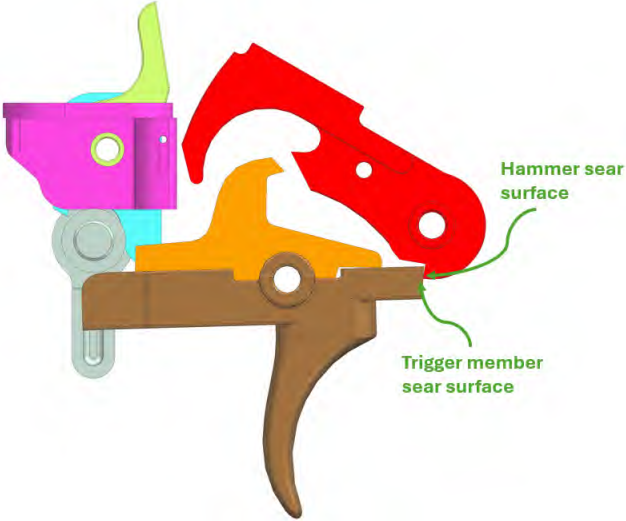
'159 Patent Claim 1	The Super Safety
member to fire the firearm, and	 Reduced Pressure on Trigger Member Allows Reset
whereupon in a second mode, rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook is prevented from holding the hammer,	 Rearward movement of the bolt means causes rearward pivoting of the hammer (red) and the cam to mechanically move the trigger member toward the reset position such that the disconnecter (orange) hook is prevented from holding the hammer hook.

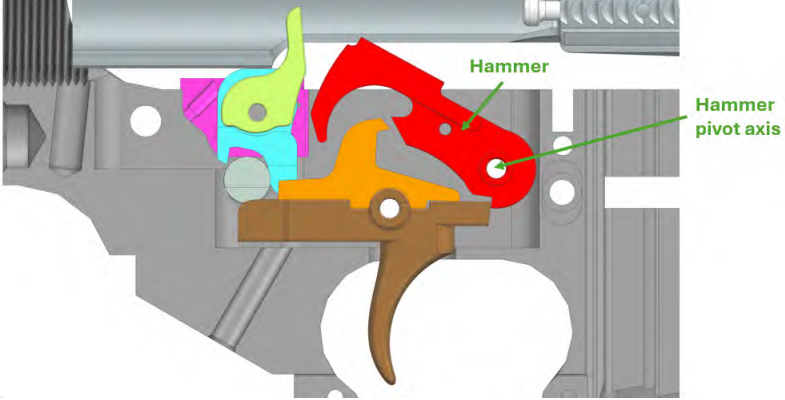
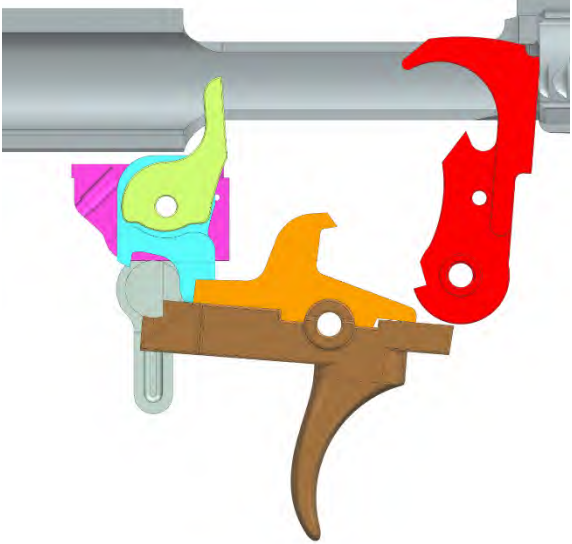
'159 Patent Claim 1	The Super Safety
	
and thereafter the bolt means moves forward into battery, at which time the user can pull the trigger member to fire the firearm.	Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position,  at which time the user can pull the trigger member (brown) to fire the firearm without having to first release pressure on the trigger member.

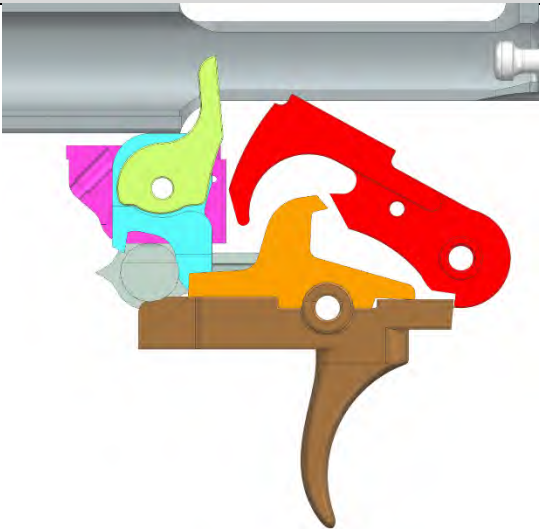
'159 Patent Claim 1	The Super Safety
	

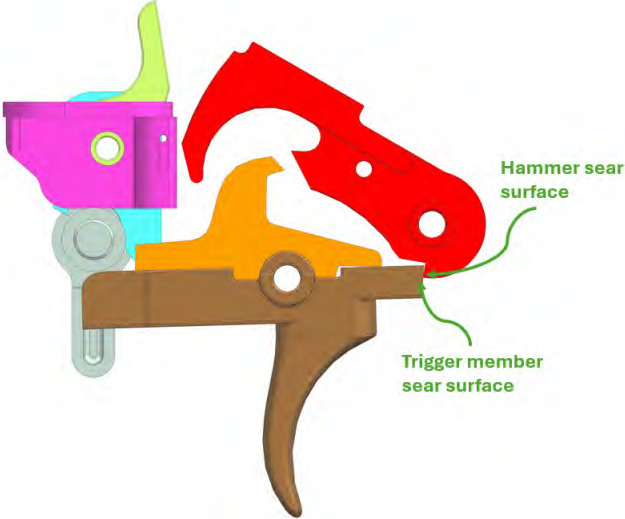
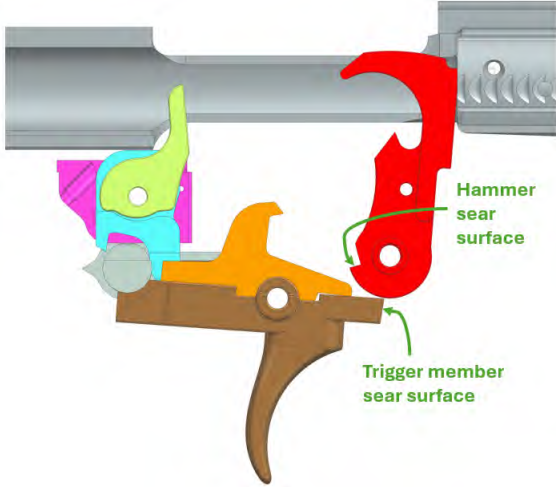
93. An exemplary comparison of the ARSS15, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

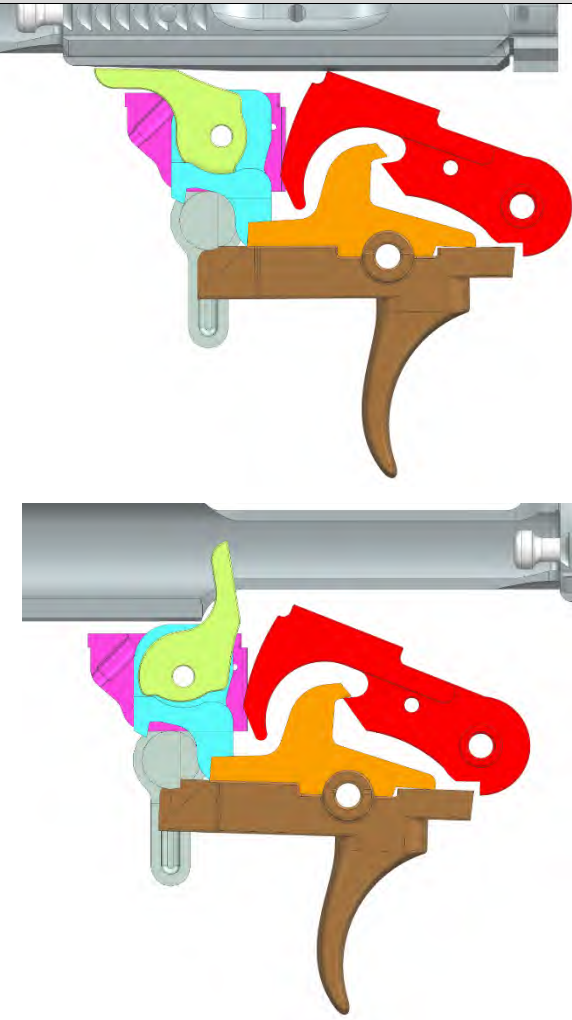
'159 Patent Claim 1	The ARSS15
1. A firearm trigger mechanism for a firearm having a fire control mechanism pocket and a reciprocating bolt means, the trigger mechanism operable in a first, standard semi-automatic mode and in a second, forced reset semi-automatic mode, the mechanism comprising:	When installed and used as directed, the ARSS15 is part of a trigger mechanism that uses a bolt means, for example, a bolt carrier assembly or a blow-back bolt. With the ARSS15 installed, the trigger mechanism operates in a standard semi-automatic mode and a “forced reset” semi-automatic mode 

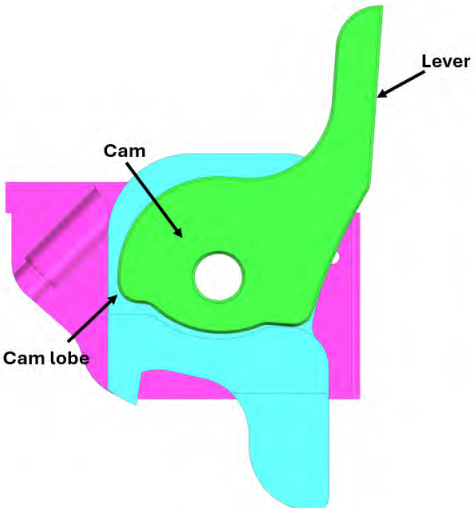
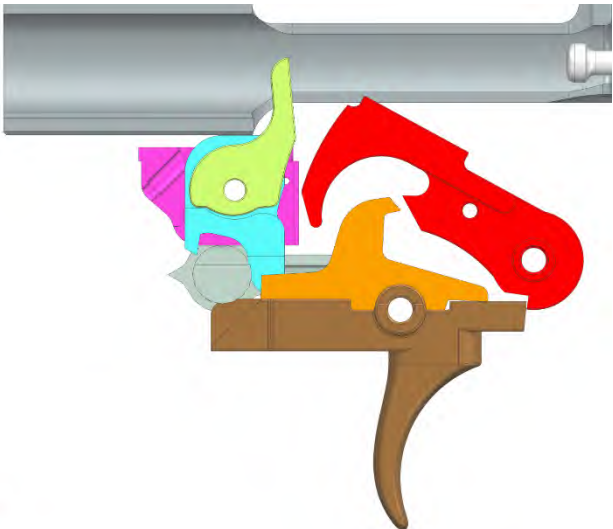
'159 Patent Claim 1	The ARSS15
	https://www.bssquirts.store/product/arss15-drop-in/  ARSS15
a hammer having a sear surface and a hook for engaging a disconnector and adapted to be mounted in a fire control mechanism pocket of a receiver	The ARSS15 (yellow, blue, and purple) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear surface and a hook for engaging a disconnector (orange).  (Plaintiff-generated renderings of ARSS15 from specimen here and below)
to pivot on a transverse hammer pivot axis between set and released positions, the hammer adapted to be pivoted rearward by rearward	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt means.

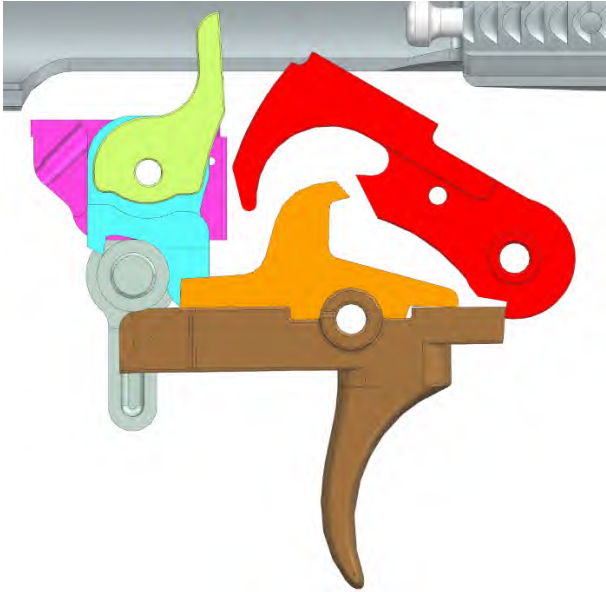
'159 Patent Claim 1	The ARSS15
movement of a bolt means,	 Hammer Set Position  Hammer Released Position
a trigger member having a trigger sear surface and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and	The ARSS15 (yellow, blue, and purple) is installed with a trigger member (brown) in the fire control mechanism pocket and the trigger member pivots on a transverse trigger member pivot axis between set and released positions. The trigger member has a sear surface.

'159 Patent Claim 1	The ARSS15
released positions,	 Trigger Member Set Position  Trigger Member Released Position
wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member	The sear surface of the trigger member (brown) and sear surface of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.

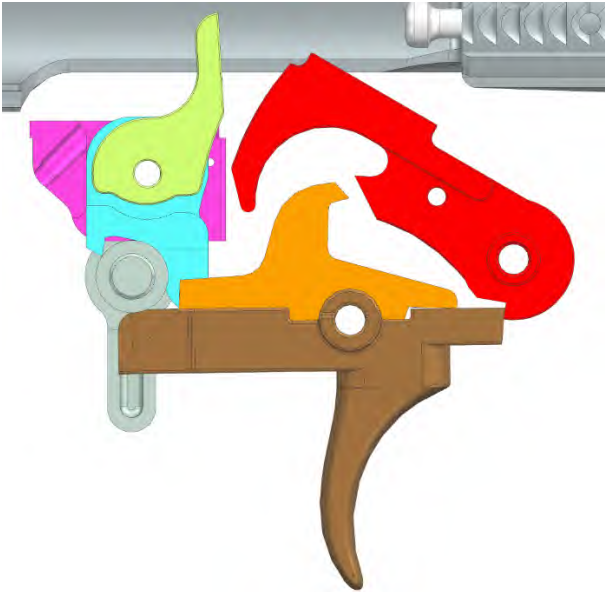
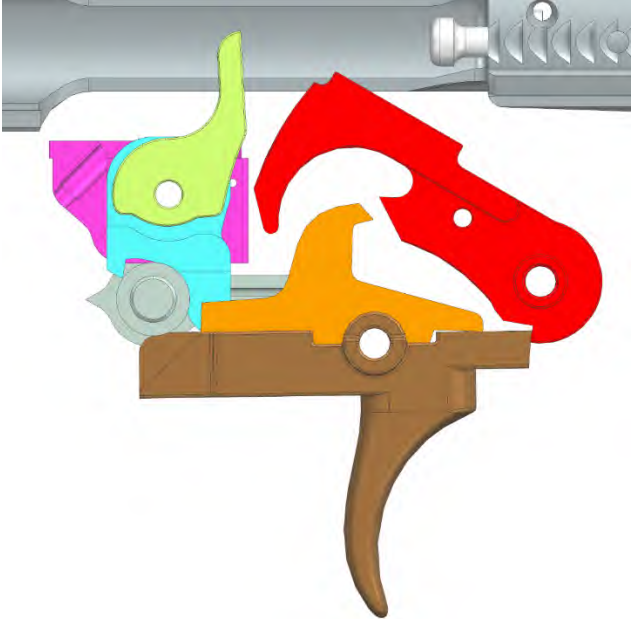
'159 Patent Claim 1	The ARSS15
	 Hammer sear surface Trigger member sear surface Trigger Member and Hammer Member Set Position
and are out of engagement in the released positions of the hammer and trigger member,	The sear surface of the trigger member (brown) and sear catch surface of the hammer (red) are out of engagement in the released position.  Hammer sear surface Trigger member sear surface Trigger Member and Hammer Member Released Positions
the disconnecter having a hook for engaging the hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis, and	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).

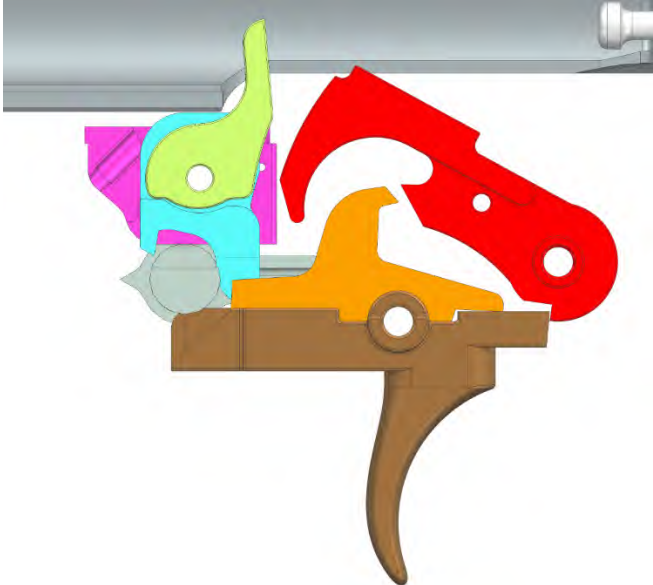
'159 Patent Claim 1	The ARSS15
	 Disconnecter Hook Engaged
a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,	The ARSS15 has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See Image above depicting ARSS15, shown in green, blue, and purple, in fire control mechanism pocket)

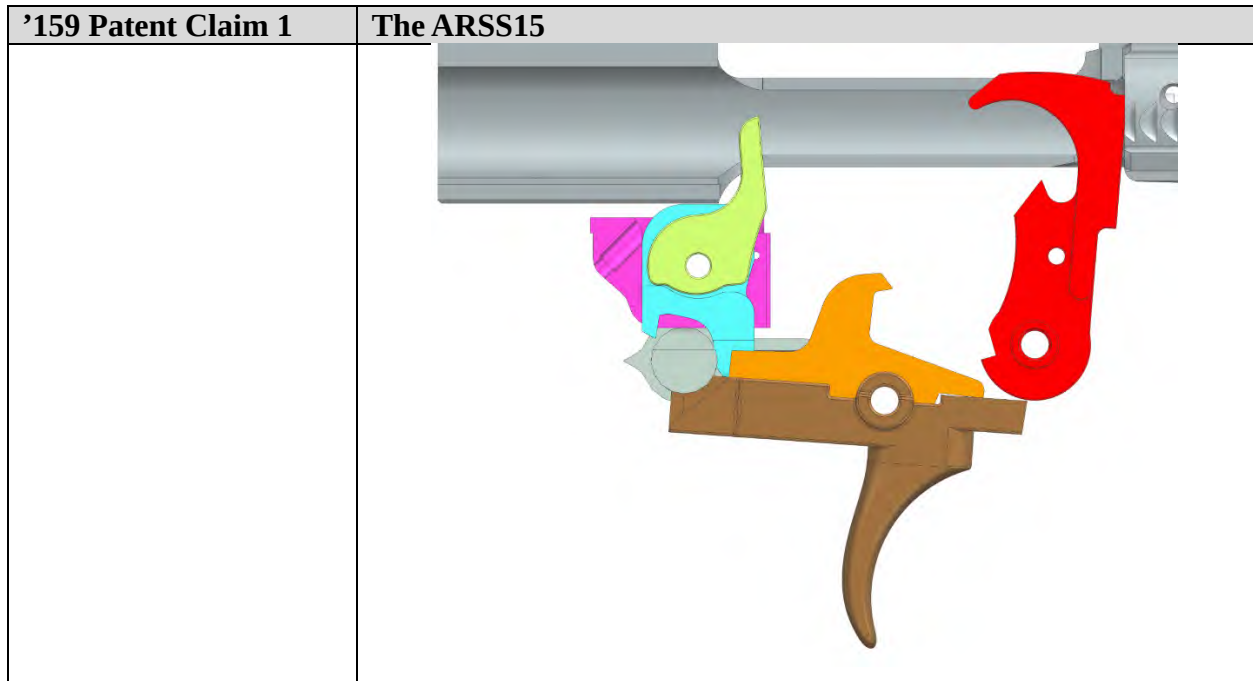
'159 Patent Claim 1	The ARSS15
	 The diagram shows a cross-sectional view of a mechanical assembly. A green lever is positioned vertically, with its lower end connected to a blue cam. The cam is mounted on a pink base. A label 'Lever' points to the green lever, and a label 'Cam' points to the blue cam. A label 'Cam lobe' points to a specific curved surface on the cam. Below the diagram, the text 'ARSS15 Cam with Lobe and Lever' is centered. ARSS15 Cam with Lobe and Lever
the cam being movable between a first position and a second position, in the second position the cam lobe forces the trigger member toward the set position,	The cam is movable between a first position and a second position.  The diagram shows a cross-sectional view of a mechanical assembly. A grey trigger member is positioned horizontally, with its lower end connected to a blue cam. The cam is mounted on a pink base. A red lever is positioned vertically, with its lower end connected to the cam. A label 'Cam and Lobe First Position' is centered below the diagram. Cam and Lobe First Position In the second position, the cam lobe moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.

'159 Patent Claim 1	The ARSS15
	 Cam and Lobe Second Position
whereupon in the first mode, rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnector hook catches the hammer hook,	While in the first (standard semi-automatic) mode,  Rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnector (orange) hook catches the hammer hook.

'159 Patent Claim 1	The ARSS15
	Disconnecter Hook Catches the Hammer Thereafter, the bolt means moves forward into battery,
and thereafter the bolt means moves forward into battery,	
	Pressure on Trigger Member Prevents Reset . . . at which time a user must manually reduce pressure on the trigger member (brown) to free the hammer (red) from the disconnecter (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm.
at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnecter to permit	

'159 Patent Claim 1	The ARSS15
the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm, and	 Reduced Pressure on Trigger Member Allows Reset
whereupon in a second mode, rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook is	When in the second (“forced reset” semi-automatic) mode,  Rearward movement of the bolt means causes rearward pivoting of the hammer (red) and the cam (yellow) acting on the link (blue) to move the trigger member toward the reset position such that the disconnecter (orange) hook is prevented from holding the hammer hook.

'159 Patent Claim 1	The ARSS15
prevented from holding the hammer,	
and thereafter the bolt means moves forward into battery, and thereafter the hammer moves to its reset position,	 ... at which time the user can pull the trigger member (brown) to fire the firearm without having to first release pressure on the trigger member.



94. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '159 patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, installation of, encouraging, advertising, promoting, and instructing others to use and/or how to use the Super Safety and ARSS15 while selling products.

95. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claim 1 of the '159 Patent.

96. On information and belief, Defendants also contribute to the infringement of the '159 Patent by others, including their customers. Acts by Defendants that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendants of the components of the Super Safety and ARSS15, such as the cam or cam lever arm. The components are not suitable for substantial noninfringing use as they are specially designed

and adapted to be used in a fire control unit to mechanically reset a trigger mechanism and infringe the '159 Patent.

97. Defendants have engaged in egregious infringement behavior with knowledge of the '159 Patent, which has been duly issued by the USPTO, and is presumed valid. On information and belief, Defendants have known or should have known that their actions constituted and continue to constitute infringement of the '159 Patent and that the '159 Patent is valid at least through the service of this complaint. Defendants could not reasonably or subjectively believe that their actions do not constitute infringement of the '159 Patent, nor could they reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants have continued their infringing activities. As such, Defendants willfully infringe the '159 Patent.

98. By their actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '159 Patent pursuant to 35 U.S.C. § 271.

99. By their actions, Defendants' infringement of the '159 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

100. By their actions, Defendants' infringement of the '159 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

101. Defendants' infringement of the '159 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

102. Defendants' acts of infringement are willful and for no other purpose than to deliberately and irreparably harm Plaintiffs' business, sales, reputation, and good-will.

103. Plaintiffs have been substantially harmed by Defendants' infringing activities and are entitled to relief including but not limited to a preliminary injunction, a permanent injunction, damages adequate to compensate for the infringement, being lost profits or no less than a reasonable royalty, treble damages, and attorneys' fees.

COUNT V — INFRINGEMENT OF THE '403 PATENT

104. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

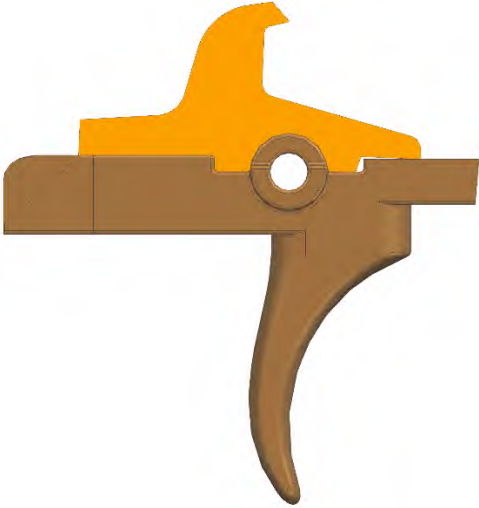
105. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '403 patent, including but not limited to claims 38 and 54, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '403 patent. Such unlicensed products include the Infringing Devices.

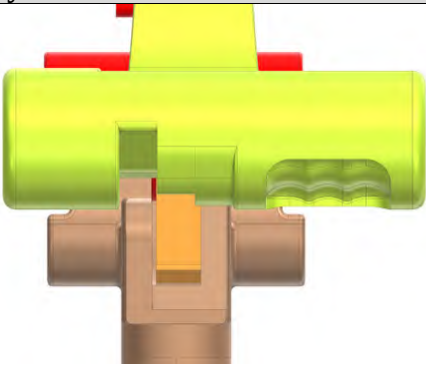
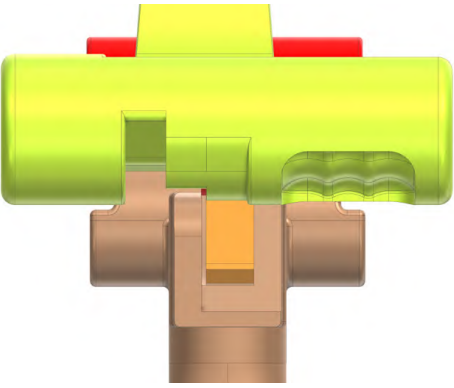
106. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '403 patent, including but not limited to claims 38 and 54, literally and/or under the doctrine of equivalents.

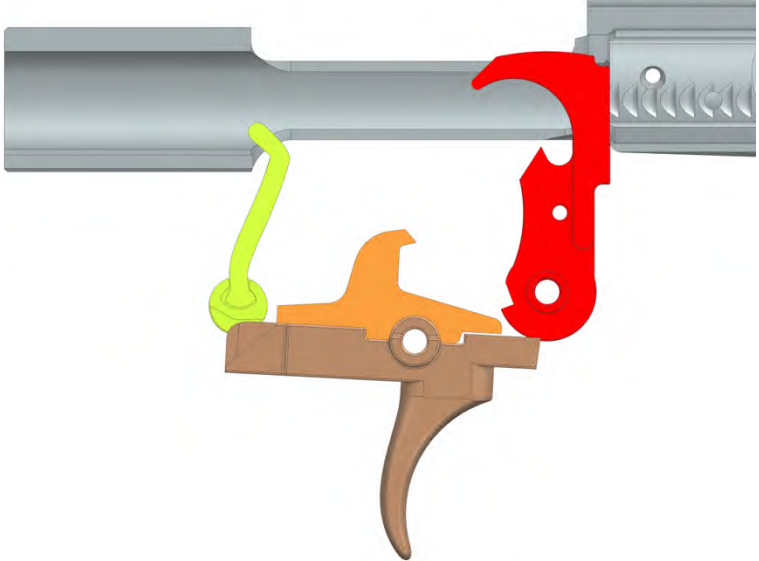
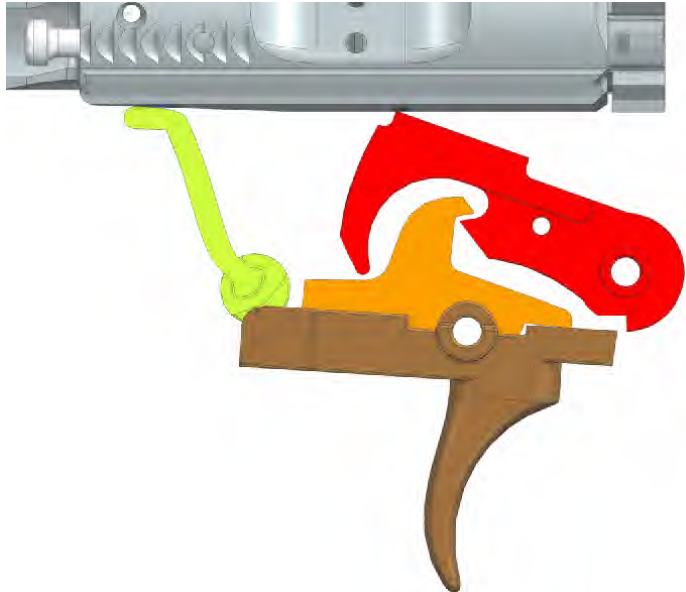
107. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 38 of the '403 patent is illustrated in the chart below:

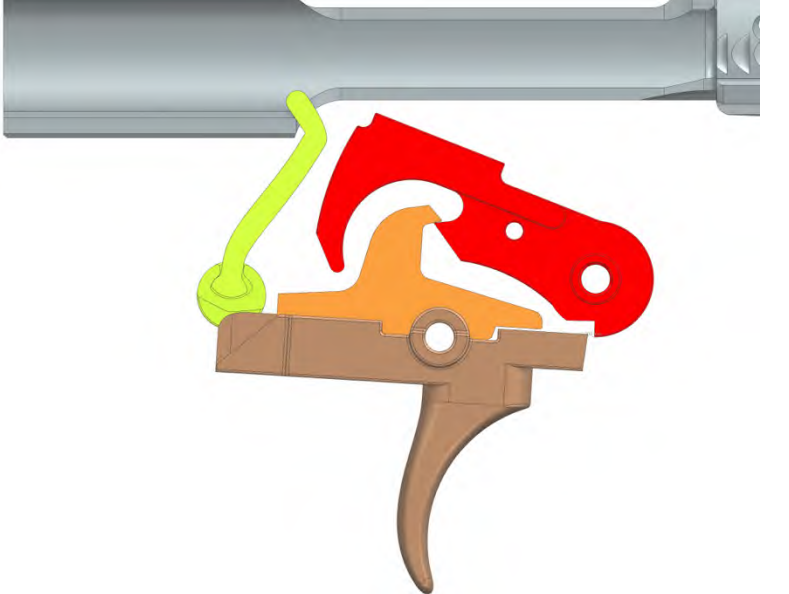
'403 Patent Claim 38	The Super Safety
38. A forced reset trigger mechanism, comprising:	When installed and used as directed, the Super Safety is part of a trigger mechanism.

'403 Patent Claim 38	The Super Safety
	 https://www.bssquirts.store/product-category/hoffman-advance-safety/  Super Safety Ex. F, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12
a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;	The Super Safety (yellow) is installed in a fire control mechanism pocket along with a hammer (red) that has a hammer hook and pivots on a transverse axis.

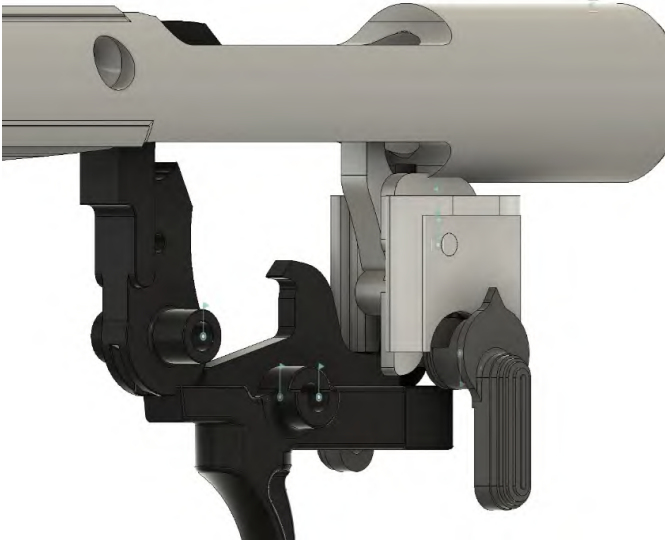
'403 Patent Claim 38	The Super Safety
	 Super Safety (Installed) (Plaintiff-generated renderings of Super Safety here and below)
a disconnecter having a disconnecter hook and adapted to pivot on a transverse disconnecter pivot axis; a trigger member; and	The Super Safety is installed along with a disconnecter (orange) which has a disconnecter hook and pivots on a transverse disconnecter pivot axis, and a trigger member (brown)  Disconnecter and Trigger Member
a safety selector adapted to be movable between a standard semi-automatic position and a forced reset semi-automatic position,	The Super Safety is a safety selector adapted to be movable between a standard semi-automatic position,

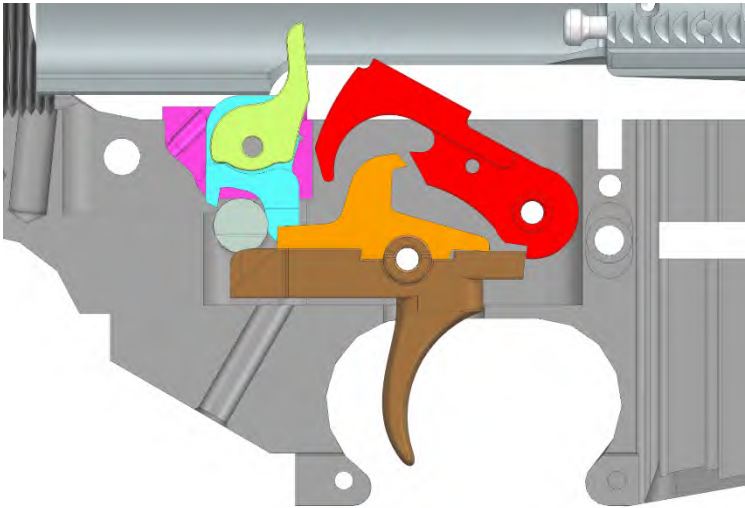
'403 Patent Claim 38	The Super Safety
	 Super Safety (installed) in Standard Semi-Automatic Position . . . and a “forced reset” semi-automatic position,  Super Safety (installed) in “Forced Reset” Semi-Automatic Position
wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,	When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated.

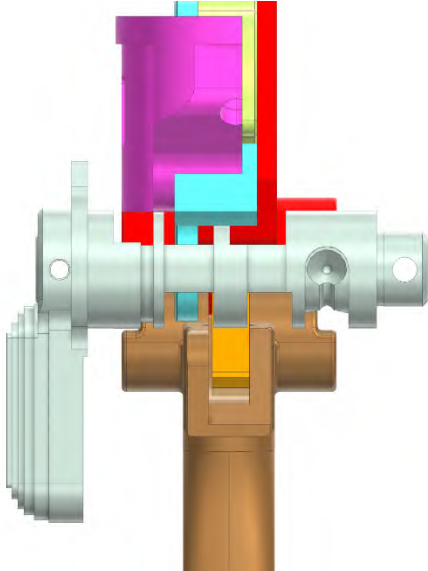
'403 Patent Claim 38	The Super Safety
and after the hammer pivots rearward to a position where the hammer hook is past the disconnecter hook, rearward pressure on the trigger member must be reduced to permit the trigger member to then be actuated to fire a firearm.	 The diagram shows a cross-section of a firearm's internal mechanism. A hammer (red) is pivoted rearward, its hook (red) passing the disconnecter hook (orange). A trigger member (brown) is shown in a rearward position, with a green spring (green) attached to its rear. The hammer hook is past the disconnecter hook. The hammer (red) pivots rearward to a position where the hammer hook is past the disconnecter hook (orange),  The diagram shows a cross-section of a firearm's internal mechanism. A hammer (red) is pivoted rearward, its hook (red) passing the disconnecter hook (orange). A trigger member (brown) is shown in a rearward position, with a green spring (green) attached to its rear. The hammer hook is past the disconnecter hook. Hammer Hook is Past Disconnecter Hook Rearward pressure on the trigger member (brown) must be reduced to permit the trigger member to then be actuated to fire a firearm.

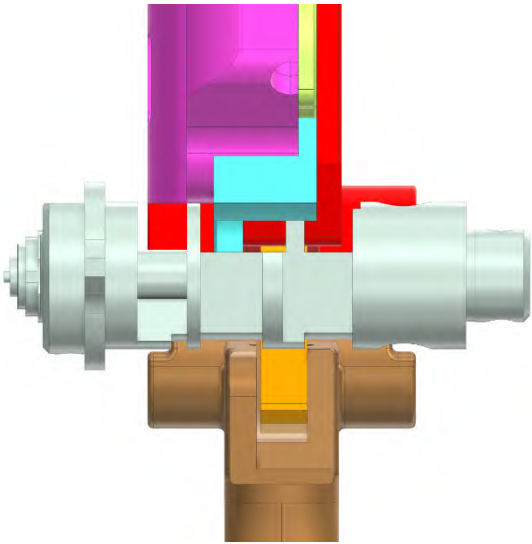
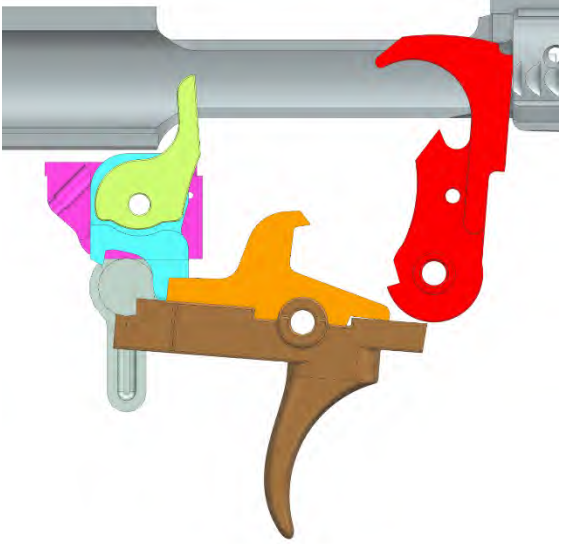
'403 Patent Claim 38	The Super Safety
	 Pressure Must be Reduced

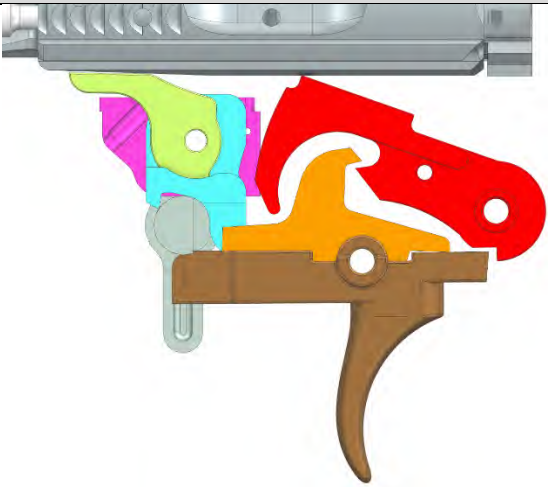
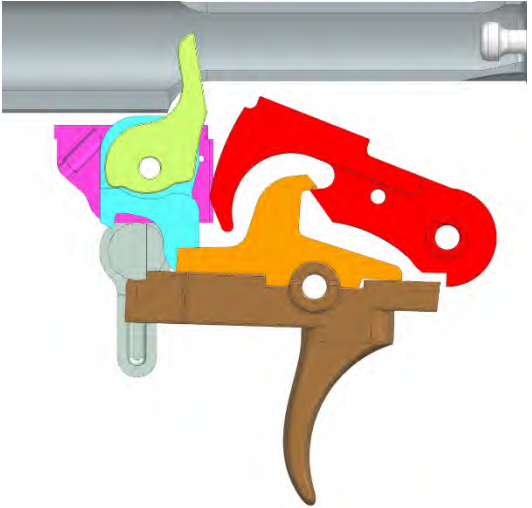
108. An exemplary comparison of the ARSS15, when assembled and used as intended, with claim 38 of the '403 patent is illustrated in the chart below:

'403 Patent Claim 38	The ARSS15
38. A forced reset trigger mechanism, comprising:	When installed and used as directed, the ARSS15 is part of a reset trigger mechanism.  https://www.bssquirts.store/product/arss15-drop-in/

'403 Patent Claim 38	The ARSS15
	 ARSS15
a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;	The ARSS15 (yellow, blue, and purple) is installed in a fire control mechanism pocket along with a hammer (red) that has a hammer hook and is adapted to pivot on a transverse hammer pivot axis.  ARSS15 (Installed) (Plaintiff-generated renderings of ARSS15 here and below)
a disconnecter having a disconnecter hook and adapted to pivot on a transverse disconnecter pivot axis; a trigger member; and	The ARSS15 is installed along with a disconnecter (orange) which has a disconnecter hook and is adapted to pivot on a transverse disconnecter pivot axis, and a trigger member (brown).

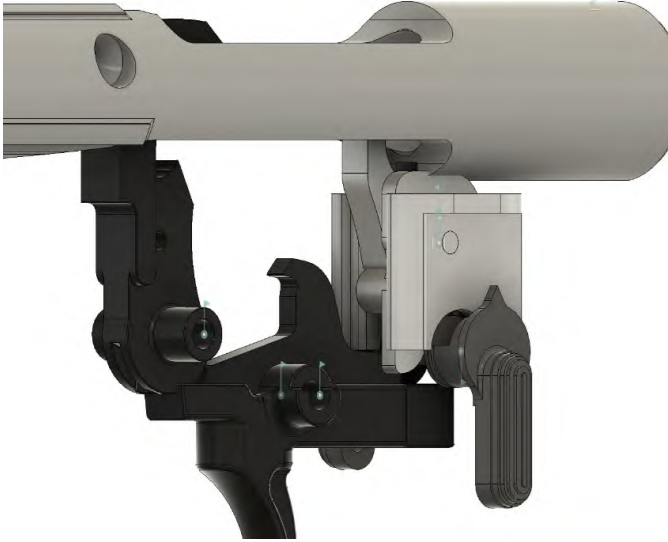
'403 Patent Claim 38	The ARSS15
	 Disconnector and Trigger Member
a safety selector adapted to be movable between a standard semi-automatic position	The ARSS15 interacts with a safety selector adapted to be movable between a standard semi-automatic position,  ARSS15 (installed) in Standard Semi-Automatic Position
and a forced reset semi-automatic position,	. . . and a “forced reset” semi-automatic position,

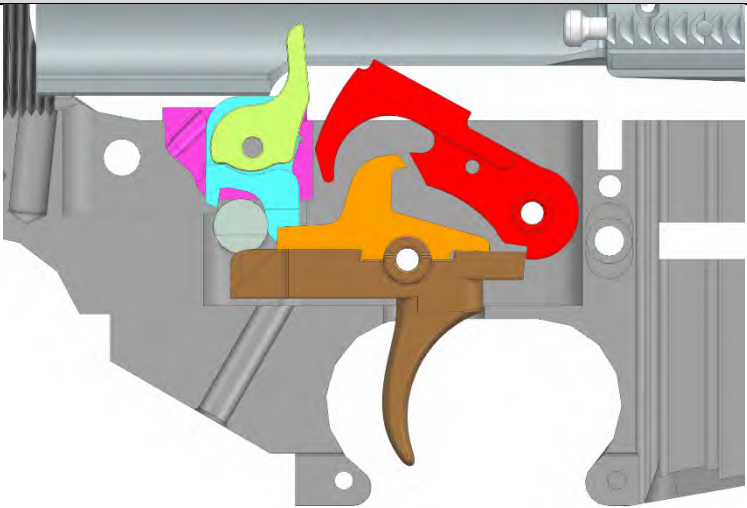
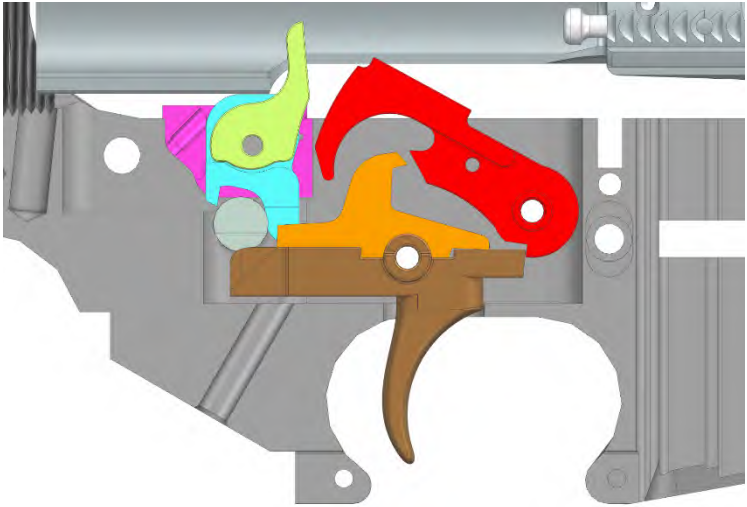
'403 Patent Claim 38	The ARSS15
	 ARSS15 (installed) in “Forced Reset” Semi-Automatic Position
wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,	When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated. 
and after the hammer pivots rearward to a position where the hammer hook is past the disconnecter hook,	The hammer (red) pivots rearward to a position where the hammer hook is past the disconnecter hook (orange),

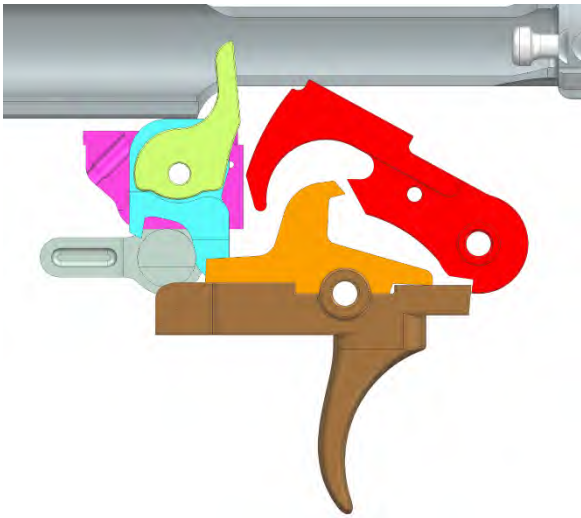
'403 Patent Claim 38	The ARSS15
rearward pressure on the trigger member must be reduced to permit the trigger member to then be actuated to fire a firearm.	 Rearward pressure on the trigger member (brown) must be reduced to permit the trigger member to then be actuated to fire a firearm. 

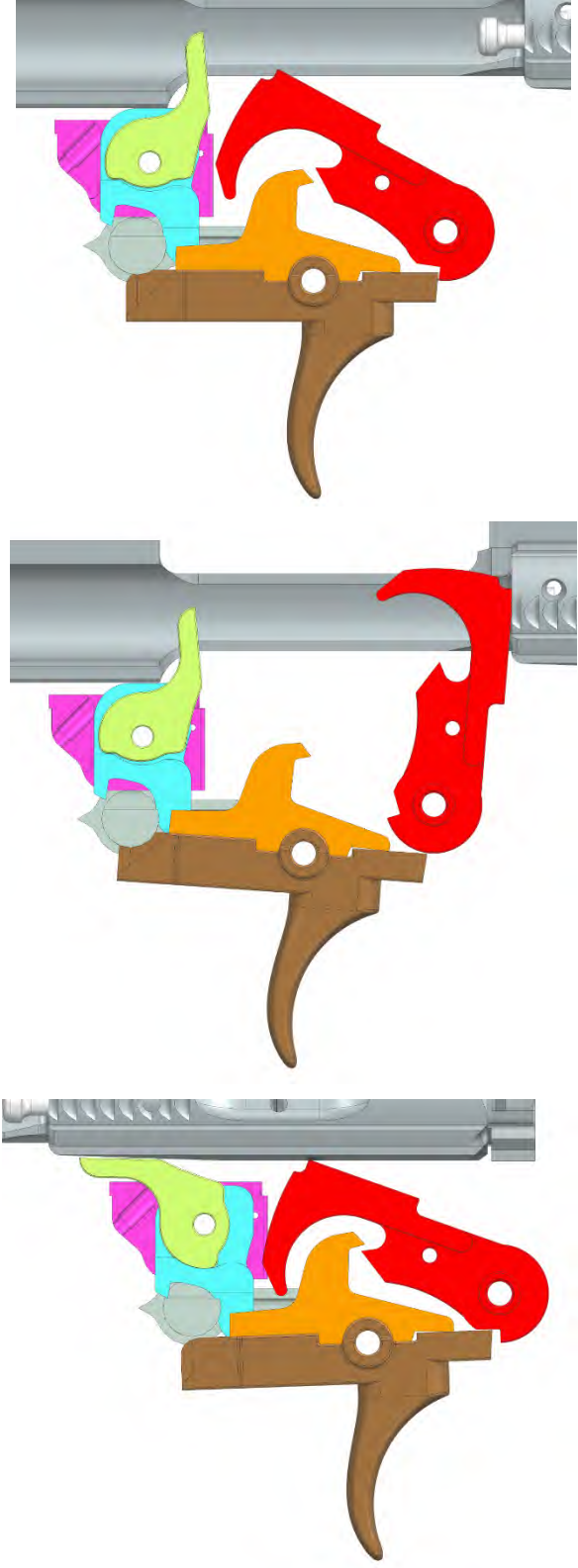
109. An exemplary comparison of the ARSS15, when assembled and used as intended, with claim 54 of the '403 patent is illustrated in the chart below:

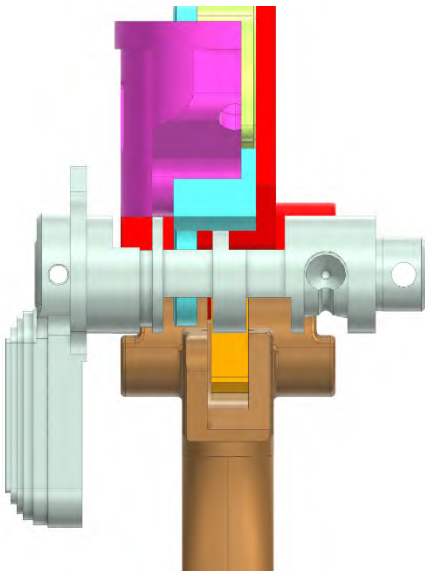
'403 Patent Claim 54	ARSS15
54. A forced reset trigger mechanism, comprising:	When installed and used as directed, the ARSS15 is part of a forced reset trigger mechanism.

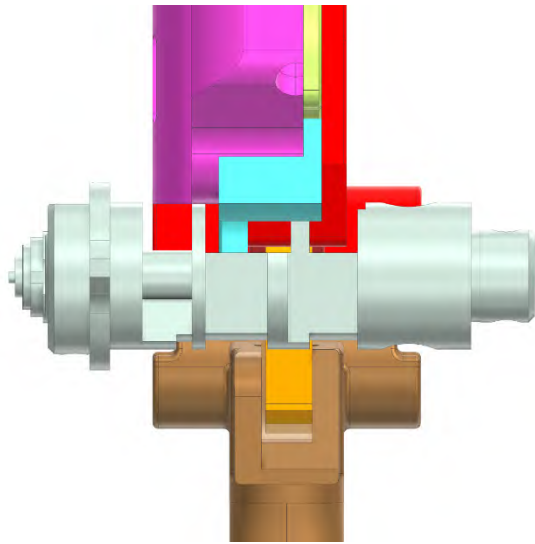
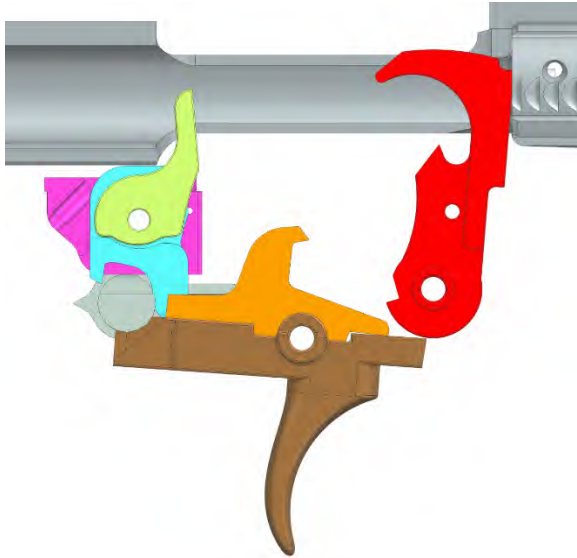
'403 Patent Claim 54	ARSS15
	 https://www.bssquirts.store/product/arss15-drop-in/  ARSS15
a trigger member configured to pivot about a transverse axis;	The ARSS15 is installed in a fire control mechanism pocket along with a trigger member that is configured to pivot about a transverse axis.

'403 Patent Claim 54	ARSS15
	
a hammer	The ARSS15 (Green, Blue, and Magenta) is installed in a fire control mechanism pocket along with a hammer (red).  ARSS15 (Installed) (Plaintiff-generated renderings of ARSS15 above and below)
a disconnecter operatively associated with the trigger member and the hammer;	The ARSS15 is installed along with a disconnecter (orange) which is operatively associated with the hammer (Red) and trigger (Brown).

'403 Patent Claim 54	ARSS15
	 Disconnecter and Trigger Member
a locking member operatively associated with the trigger member;	The ARSS15 uses the cam (Green) and link (Blue) in combination as a locking member and they are operatively associated with the trigger member. 
Wherein cycling of the action causes the trigger member to be forcibly returned to a set position in at least one operating mode; and	When using a ARSS15, the cycling of the action causes the trigger member to be forcibly returned to the set position in at least one operating mode.

'403 Patent Claim 54	ARSS15
	 Reset is Forced

'403 Patent Claim 54	ARSS15
	
wherein the trigger mechanism includes a selector inter-face structured to cooperate with a selector having at least two discrete selectable positions including: (i) a standard semi-automatic position; and (ii) a forced reset semi-automatic position,	The ARSS15 interacts with a safety selector adapted to be movable between a standard semi-automatic position,  ARSS15 (installed) in Standard Semi-Automatic Position . . . and a forced reset semi-automatic position,

'403 Patent Claim 54	ARSS15
	 ARSS15 (installed) in Forced Reset Semi-Automatic Position
Such that rotation of the selector to the forced reset position enables said forced reset operating mode.	When the safety selector is in the forced reset position the forced reset operating mode is enabled. 

110. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '403 patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, encouraging,

advertising, promoting, and instructing others to use and/or how to use the Infringing Device while selling products.

111. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claims 38 and 54 of the '403 Patent.

112. On information and belief, Defendants also contribute to the infringement of the '403 Patent by others, including their customers. Acts by Defendants that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendants of the components of the Infringing Devices, such as the trigger assembly or the cam or cam lever arm. The components are not suitable for substantial noninfringing use as they are specially designed and adapted to be used in a fire control unit to mechanically reset a trigger mechanism and infringe the '403 Patent.

113. Defendants have engaged in egregious infringement behavior with knowledge of the '403 Patent, which has been duly issued by the USPTO, and is presumed valid. On information and belief, Defendants have known or should have known that their actions constituted and continue to constitute infringement of the '403 Patent and that the '403 Patent is valid at least through the service of this complaint. Defendants could not reasonably or subjectively believe that their actions do not constitute infringement of the '403 Patent, nor could they reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants have continued their infringing activities. As such, Defendants willfully infringe the '403 Patent.

114. By their actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '403 Patent pursuant to 35 U.S.C. § 271.

115. By their actions, Defendants' infringement of the '403 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

116. By their actions, Defendants' infringement of the '403 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

117. Defendants' infringement of the '403 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

118. Defendants' acts of infringement are willful and for no other purpose than to deliberately and irreparably harm Plaintiffs' business, sales, reputation, and good-will.

119. Plaintiffs have been substantially harmed by Defendants' infringing activities and are entitled to relief including but not limited to a preliminary injunction, a permanent injunction, damages adequate to compensate for the infringement, being lost profits or no less than a reasonable royalty, treble damages, and attorneys' fees.

COUNT VI — FEDERAL TRADEMARK INFRINGEMENT
15 U.S.C. § 1114(1)

120. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

121. As described above, Plaintiff RBTM is the owner and Plaintiff Rare Breed is the exclusive licensee of the FRT[®] family of Marks in connection with firearm triggers.

122. The federal trademark registrations for FRT[®] family of Marks as detailed above are in full force and effect. Plaintiff RBTM owns all right, title, and interest in and to these federal trademark registrations.

123. The FRT[®] family of Marks are inherently distinctive and have acquired significant goodwill in the marketplace through Plaintiffs' continuous and substantially exclusive use of those

marks in commerce. As a result of their widespread and continuous use, the FRT[®] family of Marks have become uniquely associated in the minds of consumers and the trade with Plaintiffs.

124. The reputation Plaintiffs have built in the FRT[®] family of Marks is of great value to Plaintiffs.

125. Plaintiffs' use of and rights in the FRT[®] family of Marks predate any use by Defendants of FRT.

126. Defendants are wrongfully using FRT as a source identifier in U.S. commerce in connection with the distribution, advertising, and/or sale of firearm trigger products.

127. Defendants' use of the FRT[®] Mark was and is without Plaintiffs' consent. Such unauthorized use by Defendants is likely to confuse consumers as to the origin, sponsorship, endorsement, or affiliation of Defendants' products, in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

128. Defendants' unlawful acts have caused and, unless enjoined by this Court pursuant to 15 U.S.C. § 1116, will continue to cause, great harm and irreparable injury to Plaintiffs for which Plaintiffs have no adequate remedy at law, including undermining consumers' association of the FRT Marks with Plaintiffs.

129. Plaintiffs are entitled to injunctive relief prohibiting Defendants from using the FRT Marks and any mark confusingly similar to the FRT Marks.

130. Upon information and belief, Defendants have realized unjust profits, gains, and advantages from their unlawful actions, including by making sales under the FRT Marks, and have caused Plaintiffs monetary damage in an amount to be determined at trial.

COUNT VII — FALSE DESIGNATION OF ORIGIN
15 U.S.C. § 1125(A)

131. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

132. As described above, Plaintiff RBTM owns and Plaintiff Rare Breed is the exclusive licensee of the distinctive FRT[®] family of Marks in connection with firearm triggers through their continuous and substantially exclusive use of the FRT[®] family of Marks since at least as early as 2020, which is well before any use of FRT by Defendants.

133. Plaintiffs' common law rights in the FRT[®] family of Marks predate Defendants' infringing use of FRT and any other confusingly similar name or mark comprised of or containing FRT.

134. Defendants are using FRT as a source identifier in U.S. commerce in connection with the distribution, advertising, and/or sale of firearm trigger products.

135. Defendants' actions described above constitute use of a false designation of origin that wrongfully and falsely designates the origin of Defendants' goods and services and is likely to cause confusion or mistake and/or to deceive as to affiliation, connection, or association or as to the origin, sponsorship, or approval of Defendants' goods by Plaintiffs. These actions constitute a false designation of origin in interstate commerce in violation of Section 43(a)(1)(A) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(A).

136. Defendants' unlawful acts, which were committed and continue to be committed with full knowledge of Plaintiffs' prior rights in the FRT[®] family of Marks, are knowing, willful, and done in bad faith.

137. Defendants' acts have caused and, unless enjoined by this Court pursuant to 15 U.S.C. § 1116, will continue to cause, great harm and irreparable injury to Plaintiffs for which

Plaintiffs have no adequate remedy at law, including undermining consumers' association of the FRT[®] family of Marks with Plaintiffs.

138. Plaintiffs are entitled to injunctive relief prohibiting Defendants from using the FRT Mark or any other mark confusingly similar to the FRT[®] family of Marks.

139. Upon information and belief, Defendants have realized unjust profits, gains, and advantages from their unlawful actions, including by making sales under the FRT Mark, and have caused Plaintiffs monetary damage in an amount to be determined at trial.

COUNT VIII — COMMON LAW TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION

140. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

141. As described above, Plaintiff RBTM owns and Plaintiff Rare Breed is the exclusive licensee of the distinctive FRT[®] family of Marks in connection with firearm triggers through their continuous use of the marks since at least as early 2020, prior to any use of FRT by Defendants.

142. Plaintiffs' common law rights in the FRT[®] family of Marks predate Defendants' infringing use of FRT and/or other confusingly similar marks comprised of or containing FRT.

143. Defendants are using FRT as a source identifier in U.S. commerce in connection with the distribution, sale, offering for sale, and advertising of firearm triggers.

144. Defendants' use of FRT was and is without Plaintiffs' consent. Such unauthorized use by Defendants is likely to confuse consumers as to the origin, sponsorship, endorsement, or affiliation of Defendants' goods and services. As such, Defendants' acts constitute trademark infringement and unfair competition under common law.

145. Defendants' unlawful acts, which were committed and continue to be committed with full knowledge of Plaintiffs' prior common law rights in the FRT[®] family of Marks are knowing, willful, and done in bad faith.

146. Defendants' acts have caused and, unless enjoined by this Court, will continue to cause great harm and irreparable injury to Plaintiffs for which it has no adequate remedy at law, including undermining consumers' association of the FRT[®] family of Marks with Plaintiffs.

147. Plaintiffs are entitled to injunctive relief prohibiting Defendants from using FRT or any other mark confusingly similar to the FRT[®] family of Marks.

148. Upon information and belief, Defendants have realized unjust profits, gains, and advantages from their unlawful actions, including by making sales under the FRT mark, and have caused Plaintiffs monetary damage in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment against Defendants as follows:

- a. Each of the Asserted Patents has been and continues to be infringed by Defendants;
- b. Defendants' infringement of each of the Asserted Patents has been, and continues to be, willful;
- c. Each of the Asserted Patents is enforceable and not invalid;
- d. That Defendants willfully infringed Plaintiffs' registered FRT Marks in violation of the Lanham Act, 15 U.S.C. § 1114;
- e. That Defendants committed willful acts of false designation of origin through their unauthorized use of the FRT Marks in violation of the Lanham Act, 15 U.S.C. § 1125(a);
- f. That Defendants engaged in conduct constituting unfair competition under applicable law;

g. A preliminary injunction enjoining Defendants and their principals, agents, successors, assigns, attorneys, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from (1) infringement or contributing to the infringement of each of the Asserted Patents during the pendency of this case; (2) using the mark “FRT” (or any similar or derivative term, including any FRT-formative term) (i) in association with firearm triggers or any related products, (ii) in any other manner that creates confusion or is likely to create confusion with Plaintiffs or Plaintiffs’ FRT® family of Marks, (iii) that in any way constitutes unfair competition with Plaintiffs; or (3) other such equitable relief as the Court determines is warranted;

h. A permanent injunction enjoining Defendants and their principals, agents, successors, assigns, attorneys, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from (1) infringement or contributing to the infringement of each of the Asserted Patents; (2) using the mark “FRT” (or any similar or derivative term, including any FRT-formative term) (i) in association with firearm triggers or any related products, (ii) in any other manner that creates confusion or is likely to create confusion with Plaintiffs or Plaintiffs’ FRT® family of Marks, (iii) that in any way constitutes unfair competition with Plaintiffs; or (3) other such equitable relief as the Court determines is warranted;

i. Consistent with the above, order Defendants to (1) remove from display any advertisements and marketing, promotional, or sales materials comprising, bearing, or displaying the FRT Mark or any similar or derivative term that infringes or is likely to be confused with the FRT® family of Marks, including any FRT-formative term, including from all Internet webpages and social media accounts within Defendants’ custody or control; and (2) deliver to the Court for destruction, or to show proof of destruction of, any and all physical advertisements and marketing,

promotional materials, and sales materials comprising, bearing, or displaying the term “FRT” or any similar or derivative term that infringes or is likely to be confused with the FRT® family of Marks, including any FRT-formative term;

j. An award of damages adequate to compensate Plaintiffs for the infringement of each of the Asserted Patents that has occurred, together with pre-judgment interests and costs, post-judgment interests and costs, and an accounting;

k. An award of all other damages permitted by 35 U.S.C. § 284 and 15 U.S.C. § 1117(a), including increased damages up to three times the amount of compensatory damages found;

l. An award of all profits received by Defendants from sales and revenues of any kind made as a result of their trademark infringement and unfair competition;

m. An award of all damages sustained by Plaintiffs as a result of Defendants’ infringement and unfair competition, including ascertainable damages, the costs incurred by Plaintiffs for corrective advertising, the costs for this action, and Plaintiffs’ reasonable attorneys’ fees;

n. A finding that this action is an exceptional case under 35 U.S.C. § 285 and 15 U.S.C. § 1117, and an award to Plaintiffs of their costs and attorneys’ fees incurred in this action; and

o. Any and all other relief, at law or equity, to which Plaintiffs may show themselves to be entitled or which this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs, under Rule 38 of the Federal Rules of Civil Procedure, request a trial by jury of any issues so triable by right.

DATED: June 30, 2026

Respectfully submitted,

/s/ Glenn D. Bellamy

Glenn D. Bellamy

WOOD HERRON & EVANS LLP

600 Vine Street, Suite 2800

Cincinnati OH 45202

E-mail: gbellamy@whe-law.com

Tel: (513) 707-0243

Fax: (513) 241-6234

Matthew A. Colvin (Pro Hac Vice)

Texas Bar No. 24087331

FISH & RICHARDSON P.C.

1717 Main Street, Suite 5000

Dallas, TX 75201

E-mail: colvin@fr.com

Tel: (214) 747-5070

Fax: (214) 747-2091

Attorneys for Plaintiffs

ABC IP, LLC, and Rare Breed Triggers, Inc.