

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ABC IP, LLC, a Delaware limited liability
company,

and

RARE BREED TRIGGERS, INC., a Texas
corporation,

Plaintiffs.

v.

2A NINJA LLC, a Missouri limited liability
company,

and

ETHAN ALEXANDER COOK, an individual,

Defendants.

CASE NO. 26-cv-00854

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

This is an action for patent infringement in which ABC IP LLC (“ABC”), Rare Breed Triggers, Inc. (“Rare Breed”), and RBTM LLC (“RBTM”) (collectively, “Plaintiffs”) accuse 2A Ninja LLC, (“2A Ninja”) and Ethan Alexander Cook (“Cook”) (collectively, “Defendants”) of infringing U.S. Patent Nos. 10,514,223 (“the ’223 Patent”), 11,724,003 (“the ’003 Patent”), 12,036,336 (“the ’336 Patent”), 12,274,807 (“the ’807 Patent”), and 12,636,403 (“the ’403 Patent”) as follows:

PARTIES

1. Rare Breed is a corporation organized under the laws of the State of Texas with an address at 2710 Central Fwy, Suite 150-151, Wichita Falls, TX 76306.

2. 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, DE 19901.

3. Upon information and belief, 2A Ninja LLC is a limited liability company existing under the laws of the state of Missouri and has a place of business at 336 6th St, Farmington, MO 63640.

4. Upon information and belief, Cook is an individual residing in Farmington, Missouri.

JURISDICTION AND VENUE

5. This is an action for patent infringement arising under 35 U.S.C. §§ 271(a), 281, and 284-85.

6. 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.

7. Personal jurisdiction and venue over Defendants are proper in this District because all Defendants reside in and/or have a place of business in this District.

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

BACKGROUND

9. This lawsuit asserts direct, contributory, and induced infringement of U.S. Patent Nos. 10,514,223 (“the ’223 Patent”), 11,724,003 (“the ’003 Patent”), 12,036,336 (“the ’336 Patent”), 12,274,807 (“the ’807 Patent”), and 12,636,403 (“the ’403 Patent”) (together, “the Asserted Patents”).

10. The '223 Patent was lawfully and properly issued by the United States Patent and Trademark Office on December 24, 2019. Each and every claim of the '223 Patent is valid and enforceable. A true and correct copy of the '223 Patent is attached as Exhibit A.

11. The '003 Patent was lawfully and properly issued by the United States Patent and Trademark Office on August 15, 2023. Each and every claim of the '003 Patent is valid and enforceable. A true and correct copy of the '003 Patent is attached as Exhibit B.

12. The '336 Patent was lawfully and properly issued by the United States Patent and Trademark Office on July 16, 2024. Each and every claim of the '336 Patent is valid and enforceable. A true and correct copy of the '336 Patent is attached as Exhibit C.

13. The '807 Patent was lawfully and properly issued by the United States Patent and Trademark Office on April 15, 2025. Each and every claim of the '807 Patent is valid and enforceable. A true and correct copy of the '807 Patent is attached as Exhibit D.

14. 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.

15. ABC is the 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").

16. Rare Breed is the exclusive licensee of the Asserted Patents.

17. Upon information and belief, Defendants have committed acts of direct 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 Invention

18. By way of background, a typical AR15-pattern firearm, for example, is considered a semiautomatic firearm. The operation of a *standard disconnect* 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 disconnect 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 disconnect, 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 disconnect releases the hammer to engage the trigger sear.

19. In the standard AR-pattern trigger assembly, the purpose of the disconnect 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 disconnect 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 disconnect 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.

20. In contrast, in a forced reset trigger mechanism, cycling of the bolt carrier or bolt causes the trigger member to be forced 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.

21. The '223 Patent describes and claims a device in which the cycling of the action causes hammer contact with the trigger member to forcefully 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.

22. The '003 Patent, the '336 Patent, the '807 Patent, and the '403 Patent describe and claim a similarly operating device with the additional feature that it can be selected to operate in either of two distinct modes: 1) standard disconnecter semiautomatic mode and 2) forced reset semiautomatic mode.

23. The claims of the Asserted Patents define the scope of the patented invention(s).

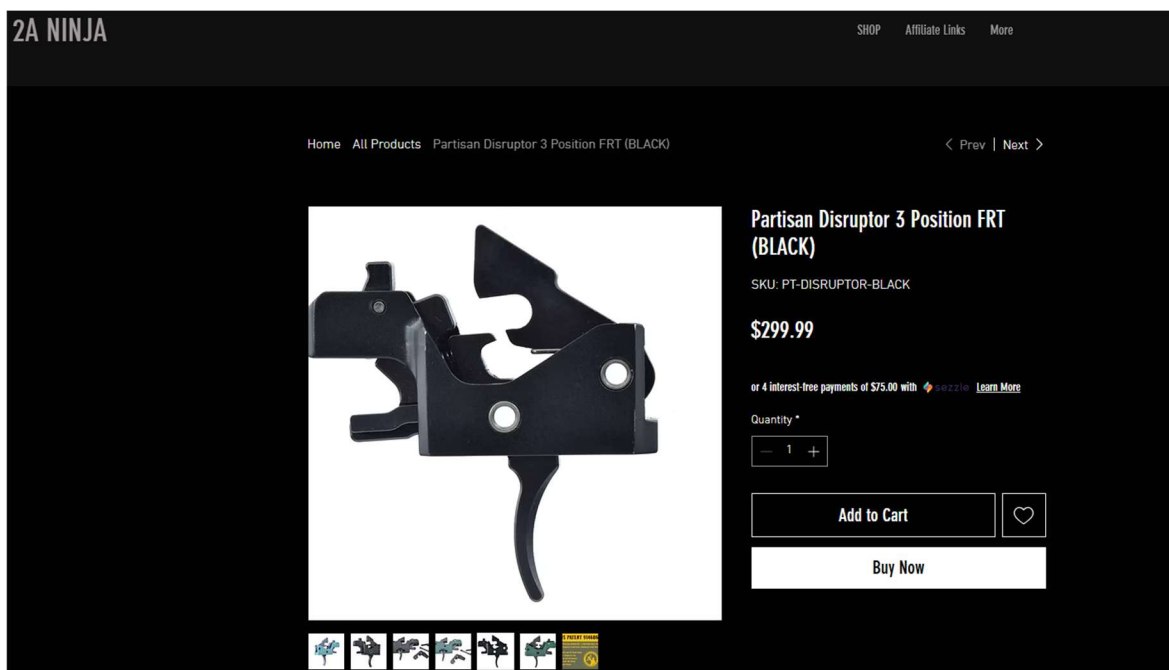
The Infringement

24. On information and belief, Defendants are currently making, using, selling, offering for sale, and/or importing a forced reset trigger assembly, which includes a three-position safety selector, known as the “Disruptor” (“the Infringing Device”), which embodies the technology claimed in at least the '223, '003, '336, '807, and '403 Patents. Peak Tactical, LLC, d/b/a Partisan Triggers, recently changed its business name to “The Triggered Company,” continuing to make and sell the Disruptor trigger. As used herein, “Disruptor” refers to the trigger made or sold under either the Partisan Triggers or The Triggered Company brand.

25. On information and belief, Defendants are making, using, selling, and/or offering for sale the Disruptor via the website <https://www.2aninja.com/product-page/partisan-disruptor-3-position-frt> (“2A Ninja website”), in multiple variants:

- a. As a standalone product; and/or
- b. Pre-installed in a receiver and/or complete firearm.

26. Exemplary photographs are shown below:



27. The Disruptor also operates in a “disconnecter 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 between positions.

28. When the Disruptor operates in the forced reset mode, the cycling of the action causes hammer contact with the trigger member to forcefully reset the hammer and trigger

member. A locking bar/member prevents the trigger member from being pulled again by the user until the bolt carrier has returned to the in-battery position.

29. When in the standard semi-automatic mode, rearward movement of the bolt carrier causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook, 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 member to fire the firearm again.

30. When in the forced reset semi-automatic mode, rearward movement of the bolt carrier causes rearward pivoting of the hammer causing the trigger member to be forced to the set position, the safety selector preventing the disconnecter hook from catching the hammer hook, and thereafter when the bolt carrier reaches the substantially in-battery position the user can pull the trigger member to fire the firearm without manually releasing the trigger member.

31. The website of Peak Tactical, LLC, the manufacturer of the Disruptor, whether operating under the brand Partisan Triggers or The Triggered Company, includes a page titled “FRT Legal Library” at <https://partisantriggers.com/library/> (now <https://triggeredcompany.com/library/>). This web page links to copies of several documents, including the '223 Patent, the '003 Patent, and the '336 Patent, showing that Partisan Triggers (now The Triggered Company) and its principals were and continue to be aware of Plaintiffs' patent rights and that they are relevant to the product it is making, using, selling, offering for sale, and/or importing. This provides notice of Plaintiffs' patent rights to reseller customers of the Disruptor, including the Defendants.

32. Upon information and belief, Cook is a principal of 2A Ninja and had knowledge of Plaintiffs' patent rights at least by his access to and knowledge of the FRT Legal Library on Partisan Triggers' (now The Triggered Company's) website.

33. Upon information and belief, Cook directed 2A Ninja to infringe the Plaintiffs' patent rights.

34. In view of the Defendants' knowledge of the Plaintiffs' patent rights as evidenced by the FRT Legal Library on Partisan Triggers' (now The Triggered Company's) website, the infringement is willful.

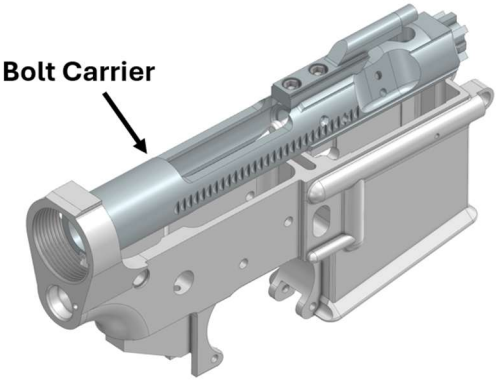
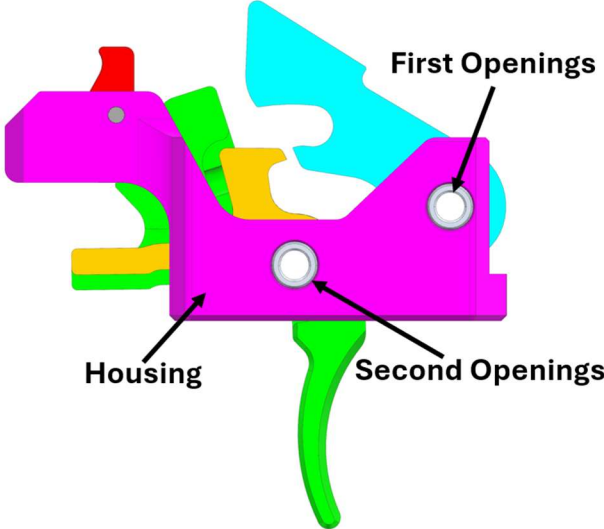
35. For the reasons explained in more specificity below, the Infringing Device infringes at least one claim of Asserted Patents and thus, Defendants are liable for patent infringement pursuant to 35 U.S.C. § 271(a), (b) and/or (c).

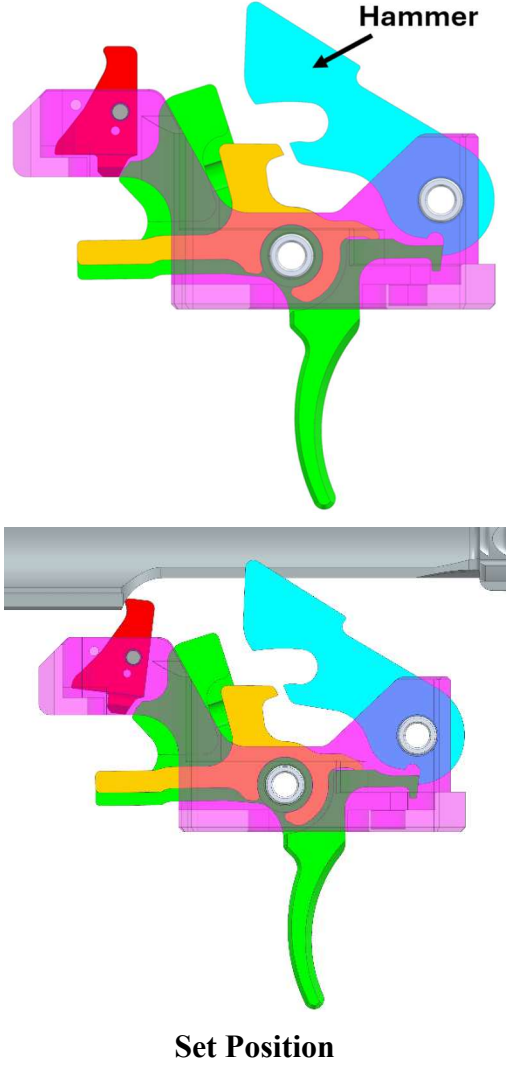
COUNT I — INFRINGEMENT OF THE '223 PATENT

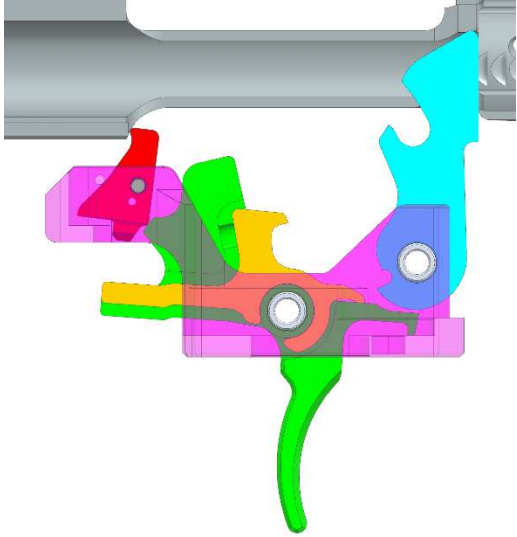
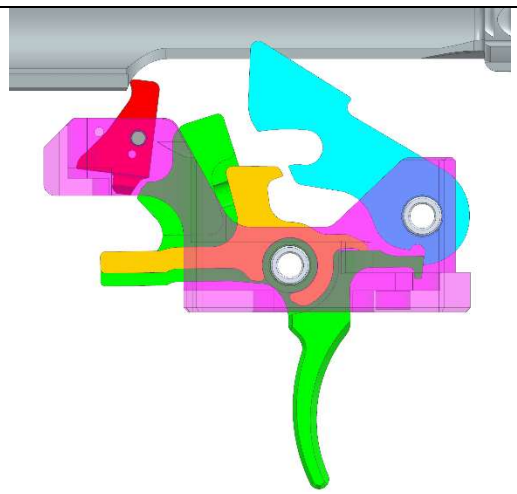
36. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

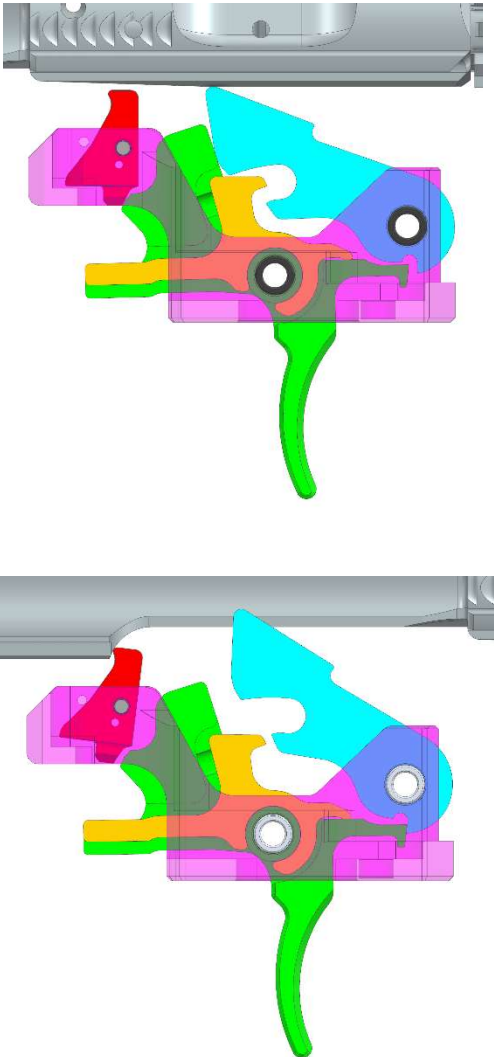
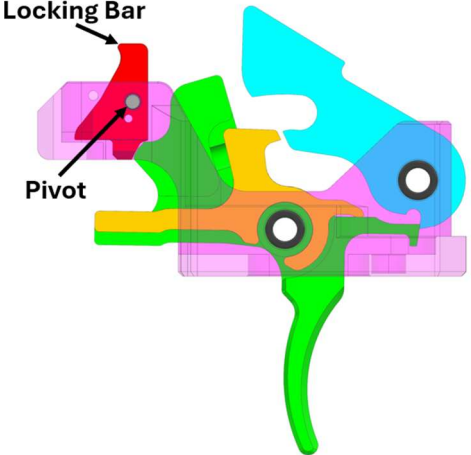
37. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '223 patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '223 patent. Such unlicensed products include the Disruptor.

38. 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 '223 patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents.

'223 Patent Claim 4	The Disruptor
	 Bolt Carrier
a housing having transversely aligned pairs of openings for receiving hammer and trigger assembly pins;	The Disruptor includes a housing with transversely aligned pairs of openings for receiving hammer and trigger assembly pins.  Hammer and trigger pins  First Openings Housing Second Openings (Plaintiff-generated renderings of the Disruptor here and below)

'223 Patent Claim 4	The Disruptor
a hammer having a sear notch and mounted in the housing to pivot on a transverse axis	The Disruptor includes a hammer (blue) with a sear notch and is mounted in the housing to pivot on a transverse axis.
between set and	 Hammer Set Position

'223 Patent Claim 4	The Disruptor
released positions;	 Released Position
a trigger member having a sear and mounted in the housing to pivot on a transverse axis	The Disruptor has a trigger member (green) that has a sear and is mounted in a housing to pivot on a transverse axis.
between set	 Set Position

'223 Patent Claim 4	The Disruptor
	
a locking bar pivotally mounted in the housing	The Disruptor includes a locking bar (red) that is pivotally mounted in the housing. 

40. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '223 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 Disruptor while selling products.

41. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claim 4 of the '223 Patent.

42. On information and belief, Defendants also contribute to the infringement of the '223 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 Disruptor, such as the trigger assembly. 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 forcibly reset a trigger mechanism and infringe the '223 Patent.

43. Defendants have engaged in egregious infringement behavior with knowledge of the '223 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 '223 Patent and that the '223 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 '223 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 '223 Patent.

44. By its actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '223 Patent pursuant to 35 U.S.C. § 271.

45. By its actions, Defendants' infringement of the '223 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

46. By its actions, Defendants' infringement of the '223 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

47. Defendants' infringement of the '223 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

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

49. 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.

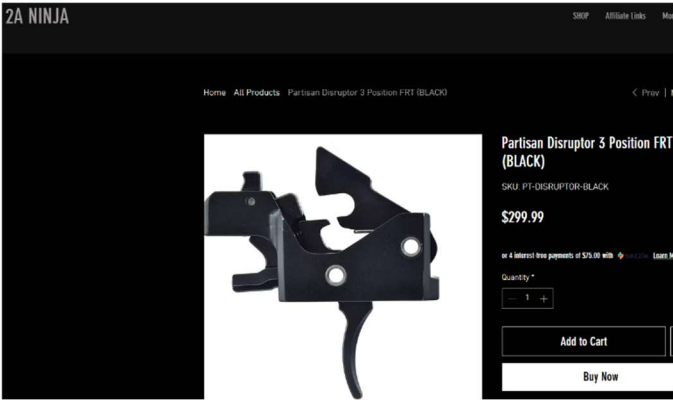
COUNT II — INFRINGEMENT OF THE '003 PATENT

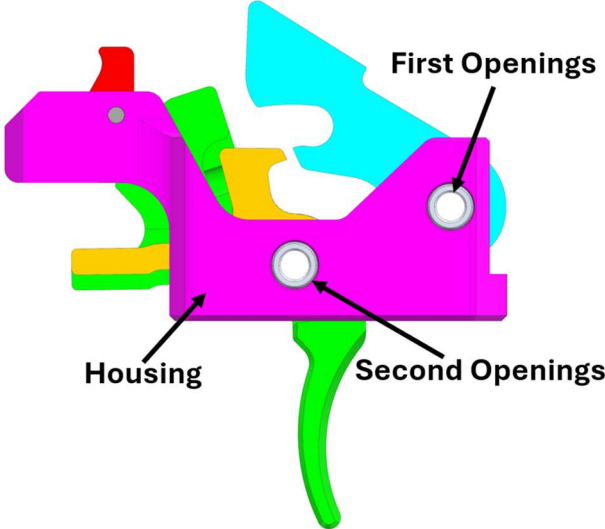
50. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

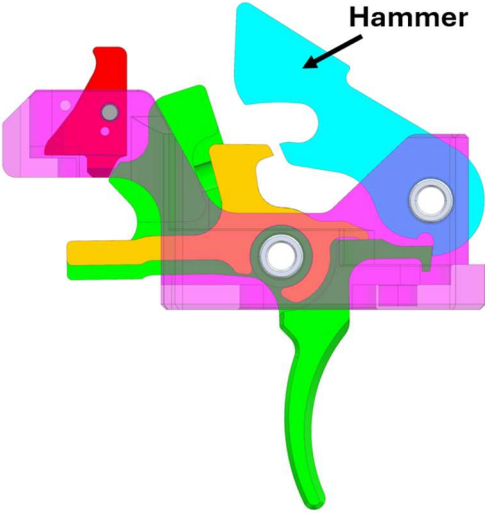
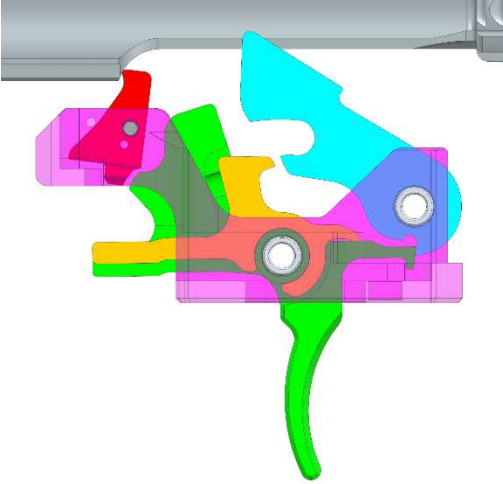
51. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '003 patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '003 patent. Such unlicensed products include the Disruptor.

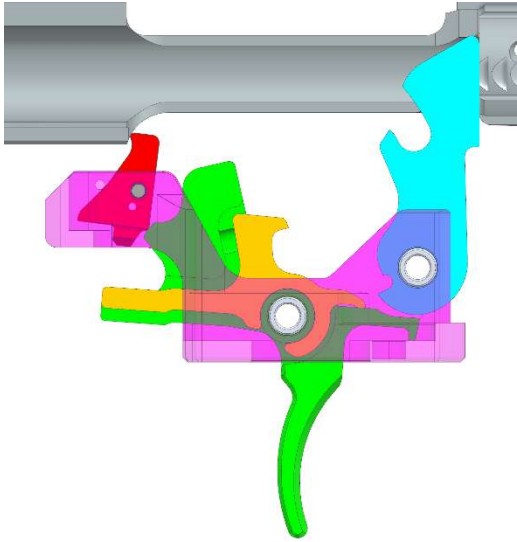
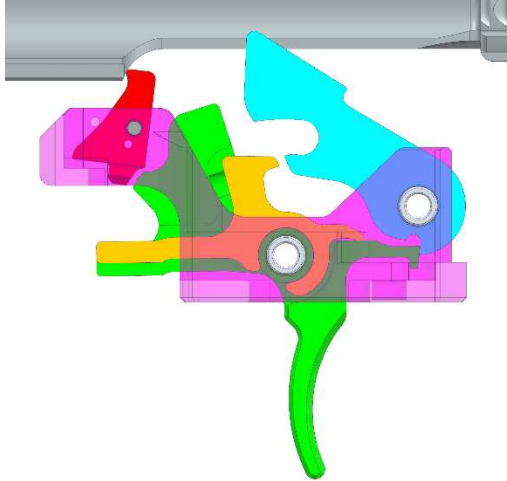
52. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '003 patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents.

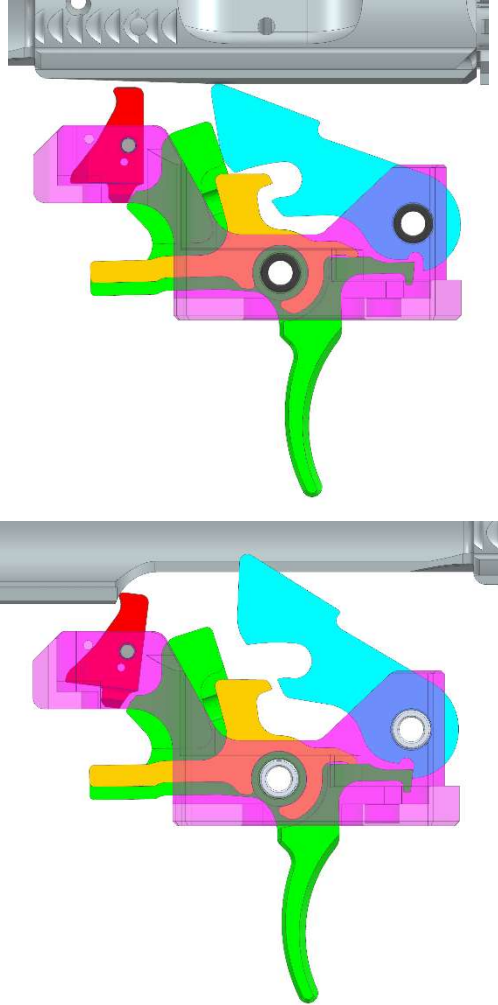
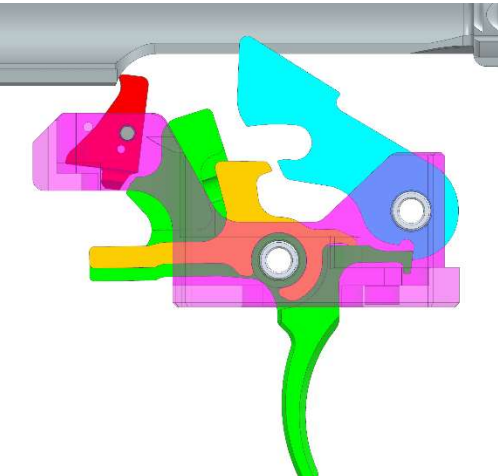
53. An exemplary comparison of the Disruptor, when assembled and used as intended, with claim 4 of the '003 patent is illustrated in the chart below:

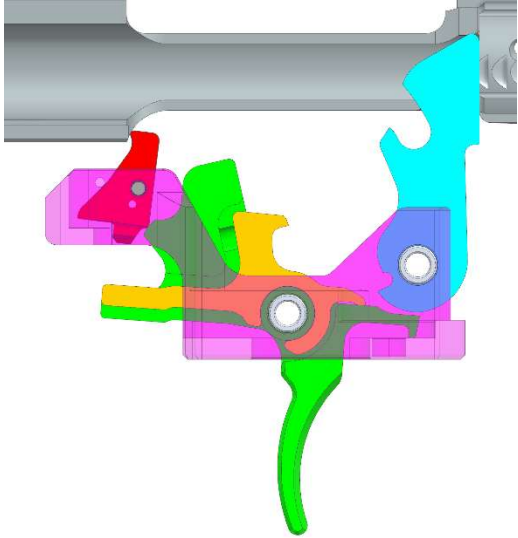
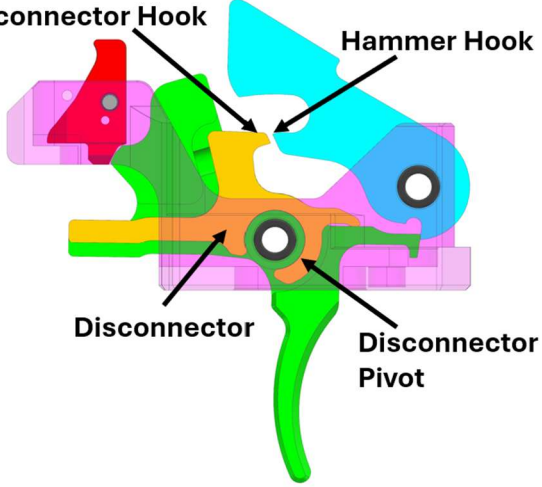
'003 Patent Claim 4	The Disruptor
4. A firearm trigger mechanism comprising:	The Disruptor is a firearm trigger mechanism.  https://www.2aninja.com/product-page/partisan-disruptor-3-position-frt
a housing having a first pair of transversely aligned openings for receiving a hammer pin and a second pair of transversely aligned openings for receiving a trigger member pin,	The Disruptor includes a housing (black) that has a first pair of transversely aligned openings for receiving a hammer pin and a second pair of transversely aligned openings for receiving a trigger member pin.

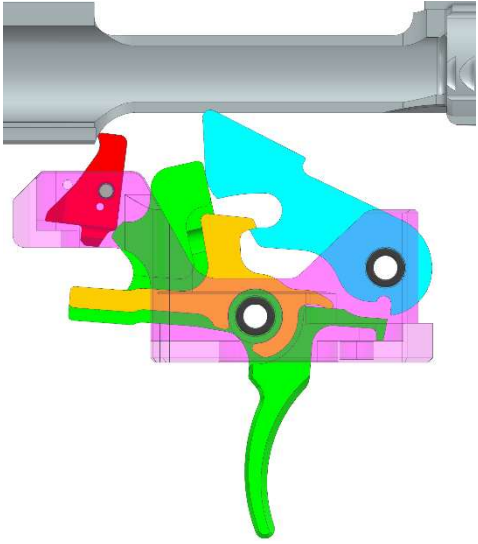
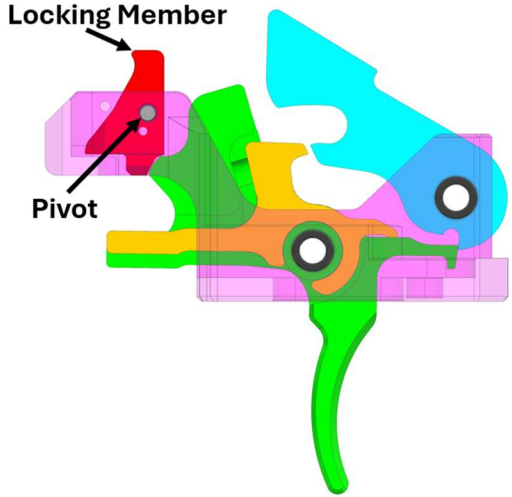
'003 Patent Claim 4	The Disruptor
	 The Disruptor is sold with hammer and trigger pins. 
a hammer having a sear catch and a hook for engaging a disconnector and mounted in said housing to pivot on said hammer pin	The Disruptor includes a hammer (blue) that has a sear catch and a hook for engaging a disconnector. It is mounted in the housing to pivot on the hammer pin between set and released positions. The hammer is pivoted rearward by rearward movement of a bolt carrier.

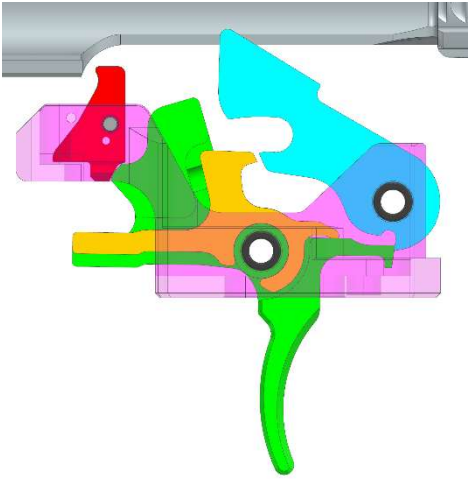
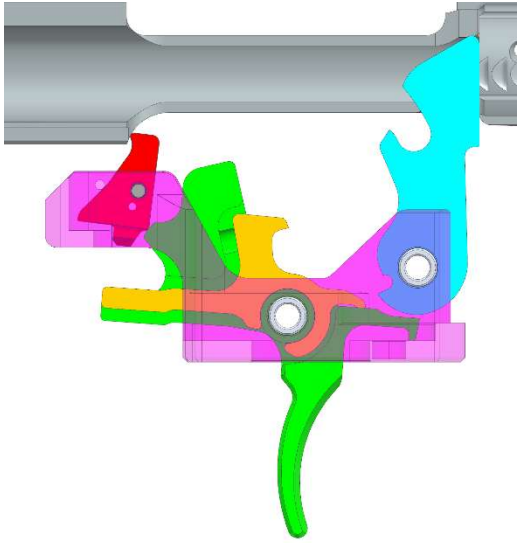
'003 Patent Claim 4	The Disruptor
	 Hammer (Plaintiff-generated renderings of the Disruptor here and below)
between set and	 Set Position

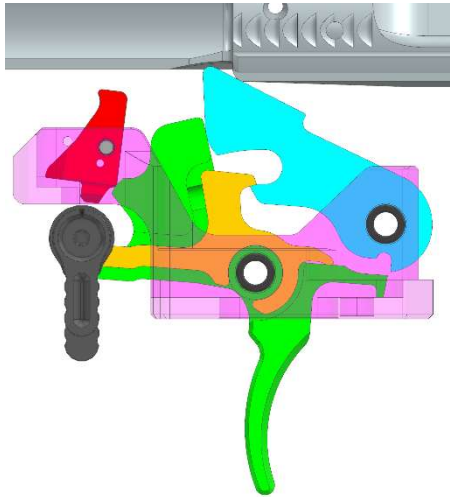
'003 Patent Claim 4	The Disruptor
released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,	 Released Position
a trigger member having a sear and mounted in said housing to pivot on said trigger member pin	The Disruptor includes a trigger member (green) that has a sear and is mounted in the housing to pivot on the trigger member pin
between set	 Set Position

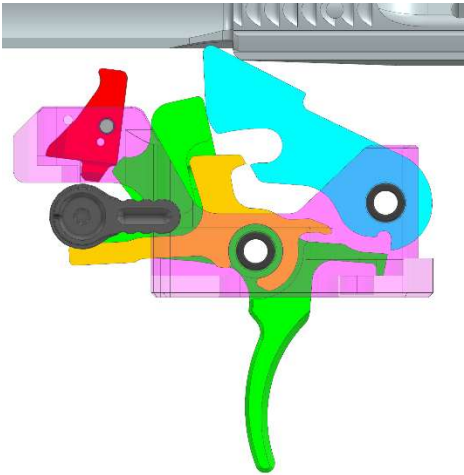
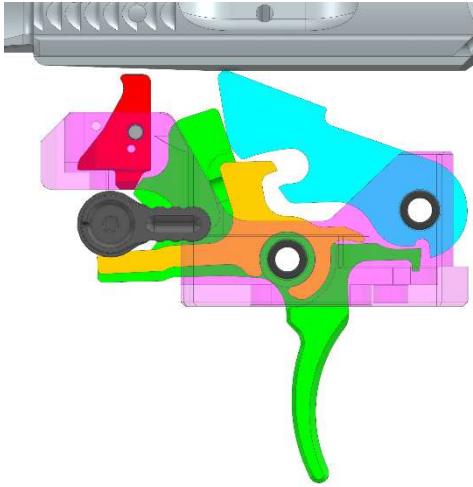
'003 Patent Claim 4	The Disruptor
	
wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member	The sear and sear catch are engaged in the set position 

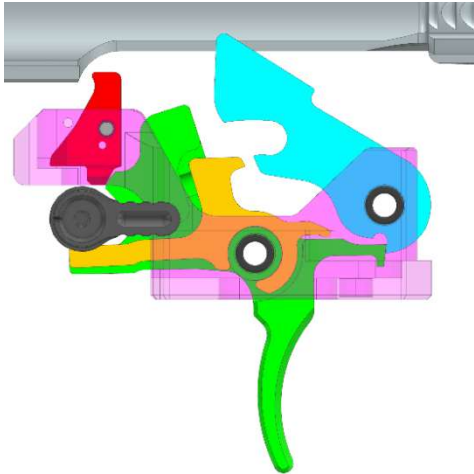
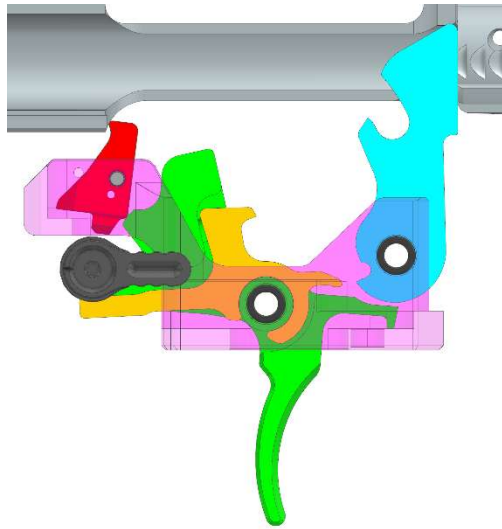
'003 Patent Claim 4	The Disruptor
and are out of engagement in said released positions of said hammer and trigger member,	(Set position) The sear and sear catch are out of engagement in the released position  Released Position
a disconnecter having a hook for engaging said hammer	The Disruptor has a disconnecter (orange) that has a hook for engaging the hammer (blue) hook  Disconnecter Hook Hammer Hook Disconnecter Disconnecter Pivot and mounted in said housing to pivot on said trigger member pin, The disconnect is mounted in the housing to pivot on the trigger (green) member pin

'003 Patent Claim 4	The Disruptor
	
a locking member mounted in said housing to pivot on a transverse locking member pin,	The Disruptor has a locking member (red) that is mounted in the housing and it pivots on a transverse locking member pin 
said locking member being pivotable between a first position at which said locking member mechanically blocks said trigger member from moving to said released position	When the locking bar (red) is in the first position, the locking member blocks the trigger (green) from being pulled

'003 Patent Claim 4	The Disruptor
	 First position mechanically blocked
and a second position at which said locking member does not mechanically block said trigger member allowing said trigger member to be moved to said released position, said locking member spring biased toward said first position and adapted to be moved against said spring bias to said second position by contact from the bolt carrier during forward movement of the bolt carrier as the bolt	When the locking bar (red) is in the second position, it does not prevent the trigger (green) from being pulled  Second position not mechanically blocked The locking member (red) is spring biased toward the first position and is moved against the spring bias to the second position by contact of the bolt carrier during forward movement of the bolt carrier as the bolt carrier reaches a substantially in-battery position.

'003 Patent Claim 4	The Disruptor
carrier reaches a substantially in-battery position, and	
a safety selector adapted to be mounted in a fire control mechanism pocket of a receiver to pivot between safe, standard semi-automatic, and forced reset semi-automatic positions,	The Disruptor includes a safety selector that is mounted in the fire control mechanism pocket of a receiver to pivot between safe, standard semi-automatic, and forced reset semi-automatic positions.  Safety Selector
whereupon in said standard semi-automatic position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnect hook catches said hammer hook, at which time a user must manually release said trigger member to free said hammer from said disconnect 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	While in the standard semi-automatic position rearward movement of the bolt carrier causes the hammer (blue) to pivot and the disconnect (orange) hook catches the hammer hook  Standard semi-automatic position
whereupon in said forced reset semi-automatic position, rearward movement of the bolt carrier causes rearward pivoting of said hammer causing said	When the Disruptor is in the forced reset semi-automatic position rearward movement of the bolt carrier causes the hammer (blue) to pivot which

'003 Patent Claim 4	The Disruptor
trigger member to be forced to said set position,	causes the trigger (green) to be forced to the set position.  Trigger pulled to the rear, hammer first touches the trigger  Hammer has now caused the trigger to move to the reset position
said safety selector preventing said disconnecter hook from catching said hammer hook,	The safety selector prevents the disconnecter (orange) hook from catching the hammer (blue) hook

'003 Patent Claim 4	The Disruptor
	 Set Position
and thereafter when the bolt carrier reaches the substantially in-battery position the user can pull said trigger member to fire the firearm without manually releasing said trigger member	When the bolt carrier reaches a substantially in-battery position the user can pull the trigger (green) without manually releasing pressure off the trigger 

54. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '003 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 Disruptor while selling products.

55. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claim 4 of the '003 Patent.

56. On information and belief, Defendants also contribute to the infringement of the '003 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 Disruptor, such as the trigger assembly. 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 forcibly reset a trigger mechanism and infringe the '003 Patent.

57. Defendants have engaged in egregious infringement behavior with knowledge of the '003 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 '003 Patent and that the '003 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 '003 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 '003 Patent.

58. By its actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '003 Patent pursuant to 35 U.S.C. § 271.

59. By its actions, Defendants' infringement of the '003 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

60. By its actions, Defendants' infringement of the '003 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

61. Defendants' infringement of the '003 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

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

63. 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.

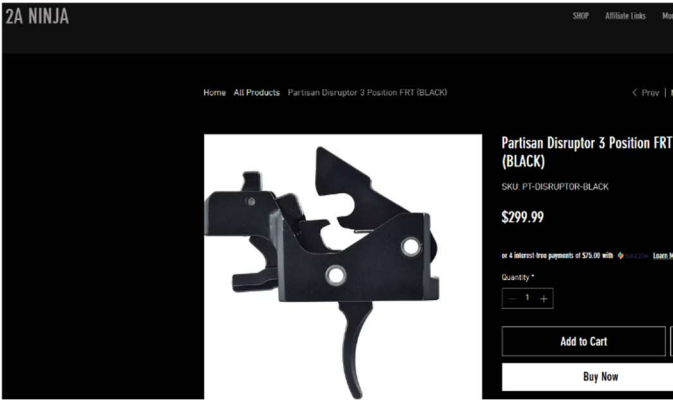
COUNT III — INFRINGEMENT OF THE '336 PATENT

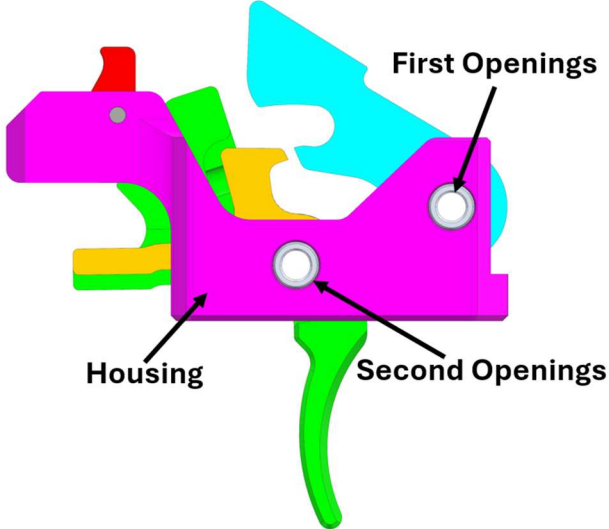
64. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

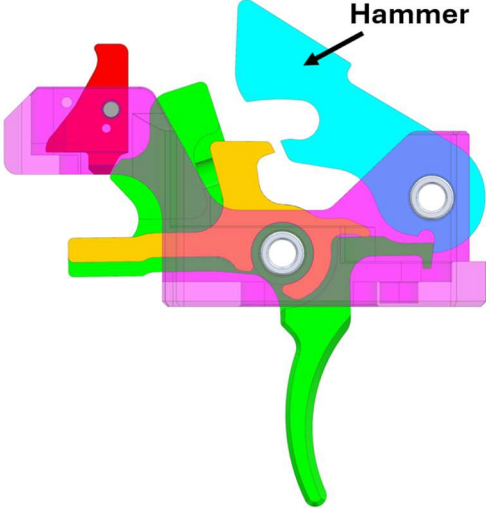
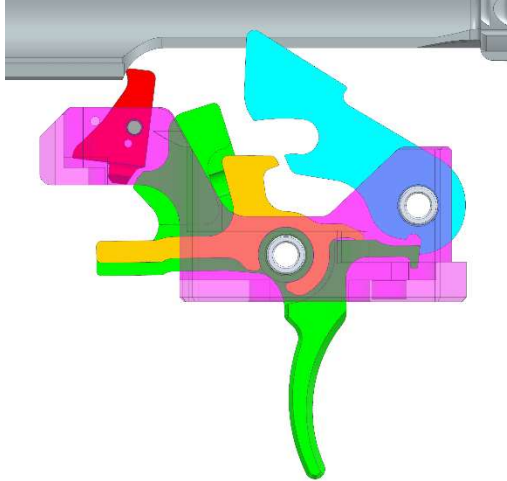
65. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '336 patent, including but not limited to claim 3, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '336 patent. Such unlicensed products include the Disruptor.

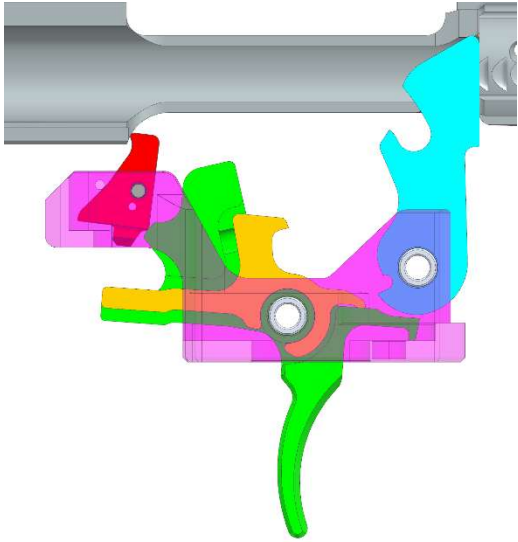
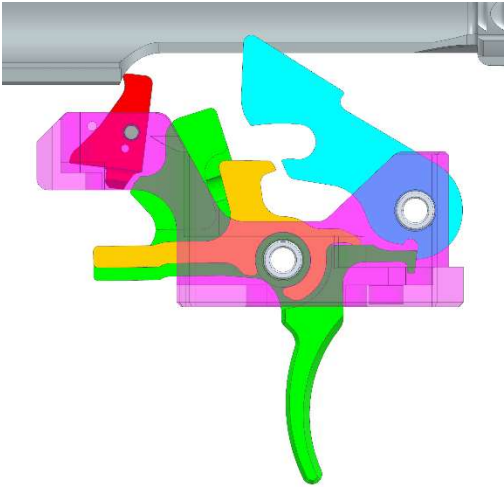
66. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '336 patent, including but not limited to claim 3, literally and/or under the doctrine of equivalents.

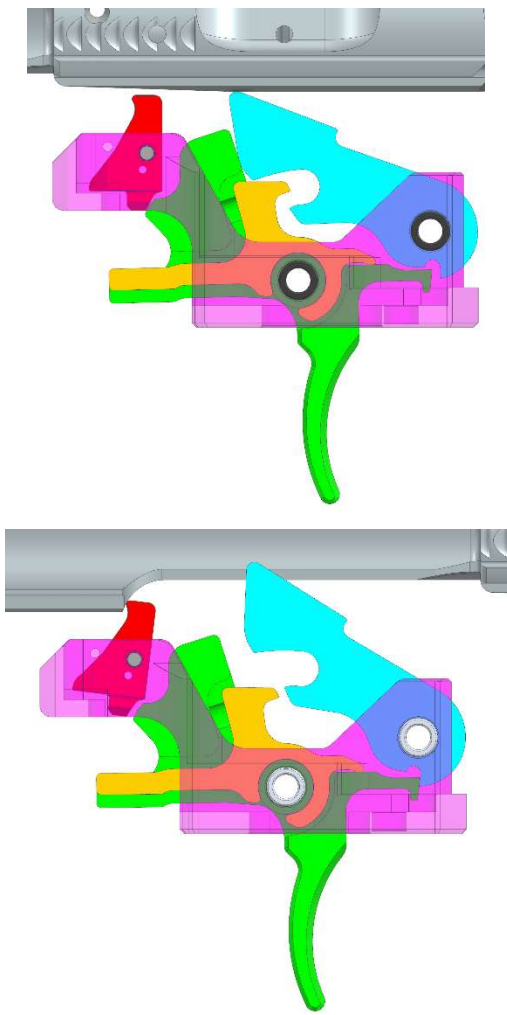
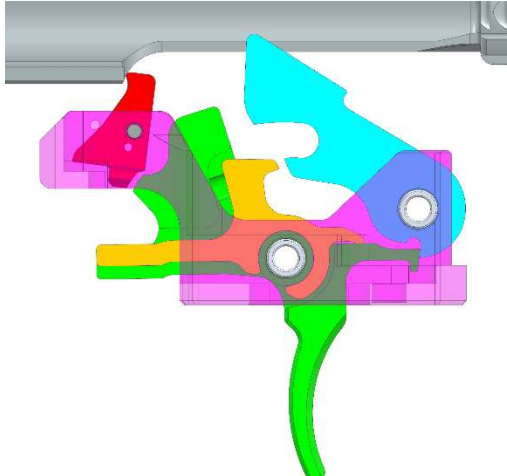
67. An exemplary comparison of the Disruptor, when assembled and used as intended, with claim 3 of the '336 patent is illustrated in the chart below:

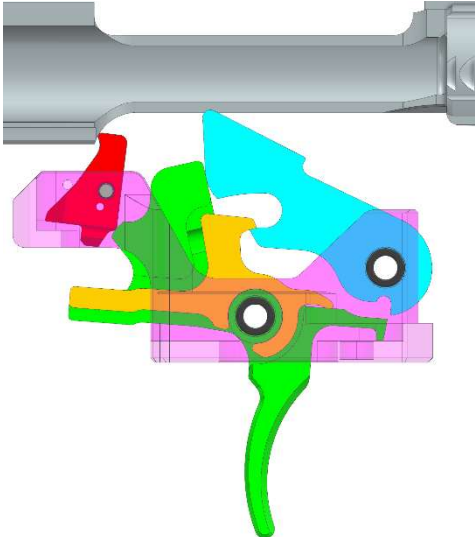
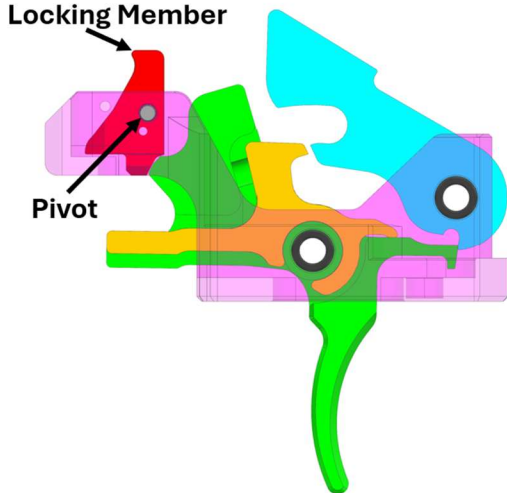
'336 Patent Claim 3	The Disruptor
3. A firearm trigger mechanism comprising:	The Disruptor is a firearm trigger mechanism.  https://www.2aninja.com/product-page/partisan-disruptor-3-position-frt
a housing having a first pair of transversely aligned openings for receiving a hammer pin and a second pair of transversely aligned openings for receiving a trigger member pin,	The Disruptor includes a housing that has a first pair of transversely aligned openings for receiving a hammer pin and a second pair of transversely aligned openings for receiving a trigger member pin.

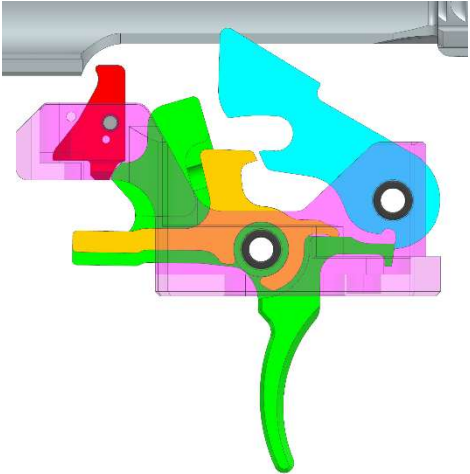
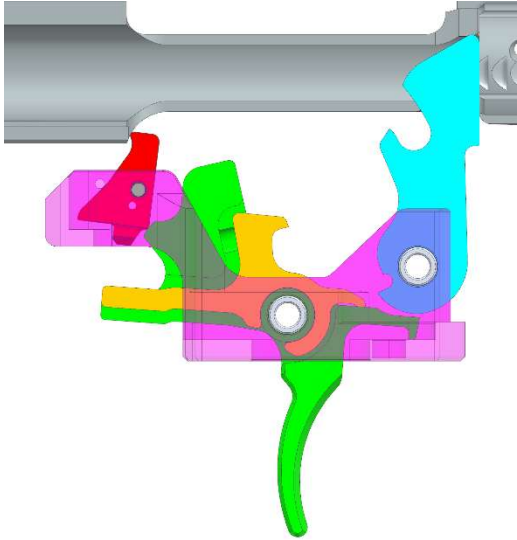
'336 Patent Claim 3	The Disruptor
	 The Infringing Devise is sold with hammer and trigger pins. 
a hammer having a sear catch and a hook for engaging a disconnecter and mounted in said housing to pivot on said hammer pin	The Disruptor includes a hammer (blue) that has a sear catch and a hook for engaging a disconnecter. It is mounted in the housing to pivot on the hammer pin between set and released positions. The hammer is pivoted rearward by rearward movement of a bolt carrier.

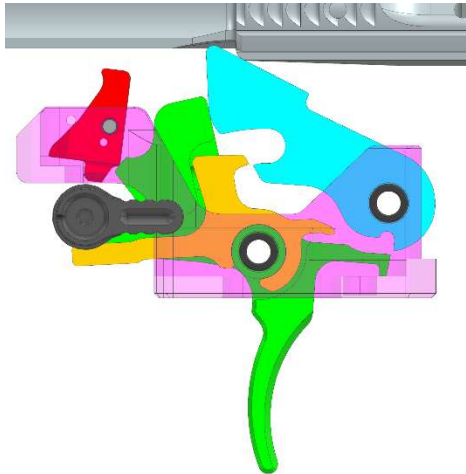
'336 Patent Claim 3	The Disruptor
	 Hammer (Plaintiff-generated renderings of the Disruptor here and below)
between set and	 Set Position

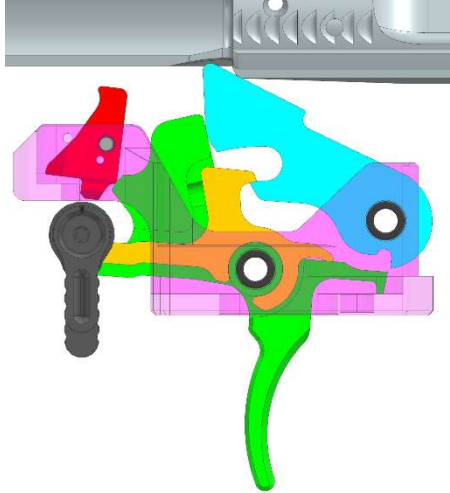
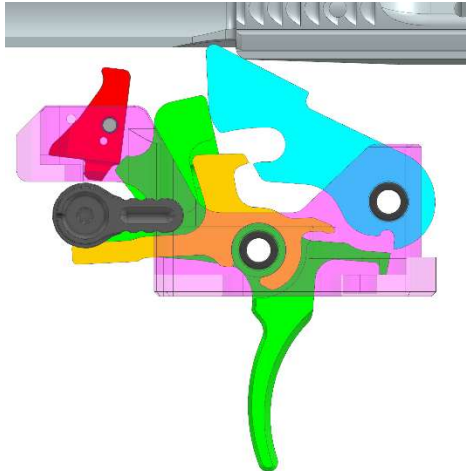
'336 Patent Claim 3	The Disruptor
released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,	 The diagram shows a cross-sectional view of a firearm's trigger mechanism. A grey bolt carrier is at the top. Below it, a red hammer is pivoted rearward. A green trigger member is in its forward position, with its sear (a small red protrusion) engaged with the hammer's hammer flange (a blue semi-circular part). Other components are colored yellow, orange, and pink. The entire assembly is mounted on a pink base. Released Position
a trigger member having a sear and mounted in said housing to pivot on said trigger member pin between set	The Disruptor includes a trigger member (green) that has a sear and is mounted in the housing to pivot on the trigger member pin  This diagram is identical to the one above, showing the same components and their assembly. The green trigger member is in its forward position, and its sear is engaged with the hammer's flange. Set Position

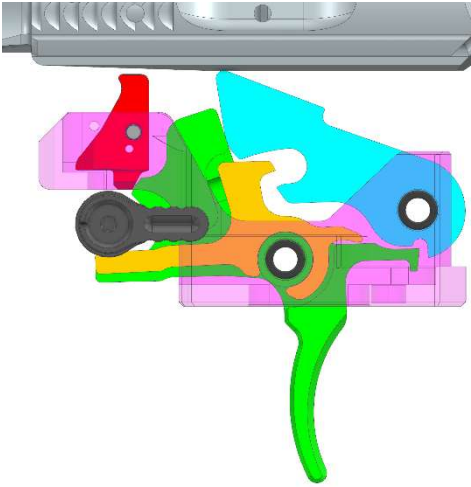
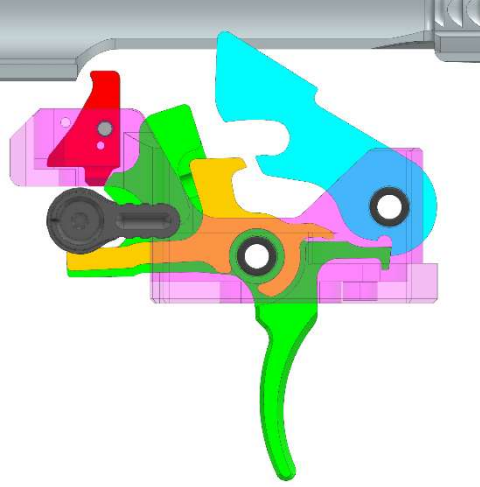
'336 Patent Claim 3	The Disruptor
	
wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member	The sear and sear catch are engaged in the set position 

'336 Patent Claim 3	The Disruptor
	
a locking member mounted in said housing to pivot on a transverse locking member pin, said locking member being pivotable between a first position at which said locking member mechanically blocks said trigger member from moving to said released position	The Disruptor has a locking member (red) that is mounted in the housing and it pivots on a transverse locking member pin.  When the locking bar (red) is in the first position, the locking member blocks the trigger (green) from being pulled

'336 Patent Claim 3	The Disruptor
	 First position mechanically blocked
and a second position at which said locking member does not mechanically block said trigger member allowing said trigger member to be moved to said released position, said locking member spring biased toward said first position and adapted to be moved against said spring bias to said second position by contact from the bolt carrier during forward movement of the bolt carrier as the bolt carrier reaches a substantially in-battery position, and	When the locking bar (red) is in the second position, it does not prevent the trigger (green) from being pulled.  Second position not mechanically blocked The locking member (red) is spring biased toward the first position and is moved against the spring bias to the second position by contact of the bolt carrier during forward movement of the bolt carrier as the bolt carrier reaches a substantially in-battery position.

'336 Patent Claim 3	The Disruptor
a safety selector adapted to be mounted in a fire control mechanism pocket of a receiver to pivot between safe, standard semi-automatic, and forced reset semi-automatic positions, said safety selector configured such that, when said safety selector is in said forced reset semi-automatic position, said safety selector causes said disconnect to be repositioned and in doing so prevents said disconnect hook from catching said hammer hook,	The Disruptor includes a safety selector that is mounted in the fire control mechanism pocket of a receiver to pivot between safe, standard semi-automatic, and forced reset semi-automatic positions.  While in the forced reset semi-automatic position the disconnect (orange) moves to a position that does not allow the disconnect hook to catch the hammer (blue) hook  Forced reset semi-automatic position
whereupon in said standard semi-automatic position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnect hook catches said hammer hook, at which time a user must manually release said trigger member to free said hammer from said disconnect to	While in the standard semi-automatic position rearward movement of the bolt carrier causes the hammer (blue) to pivot and the disconnect (orange) hook catches the hammer hook

'336 Patent Claim 3	The Disruptor
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	 Standard semi-automatic position
whereupon in said forced reset semi-automatic position, rearward movement of the bolt carrier causes rearward pivoting of said hammer causing said trigger member to be forced to said set position,	When the Disruptor is in the forced reset semi-automatic position rearward movement of the bolt carrier causes the hammer (blue) to pivot which causes the trigger (green) to be forced to the set position.  Trigger pulled to the rear, hammer first touches the trigger

'336 Patent Claim 3	The Disruptor
	 Hammer has now caused the trigger to move to the reset position
said safety selector preventing said disconnector hook from catching said hammer hook, and thereafter when the bolt carrier reaches the substantially in-battery position the user can pull said trigger member to fire the firearm without manually releasing said trigger member.	The safety selector prevents the disconnector (orange) hook from catching the hammer (blue) hook  Set Position When the bolt carrier reaches a substantially in-battery position the user can pull the trigger (green) without manually releasing pressure off the trigger

68. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '336 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 Disruptor while selling products.

69. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claim 3 of the '336 Patent.

70. On information and belief, Defendants also contribute to the infringement of the '336 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 Disruptor, such as the trigger assembly. 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 forcibly reset a trigger mechanism and infringe the '336 Patent.

71. Defendants have engaged in egregious infringement behavior with knowledge of the '336 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 '336 Patent and that the '336 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 '336 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 '336 Patent.

72. By its actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '336 Patent pursuant to 35 U.S.C. § 271.

73. By its actions, Defendants' infringement of the '336 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

74. By its actions, Defendants' infringement of the '336 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

75. Defendants' infringement of the '336 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

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

77. 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.

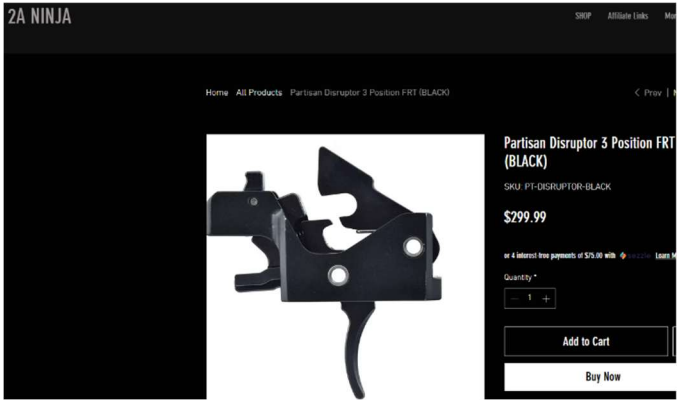
COUNT IV — INFRINGEMENT OF THE '807 PATENT

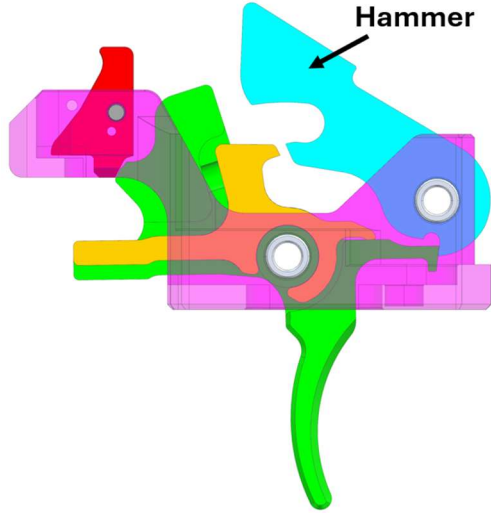
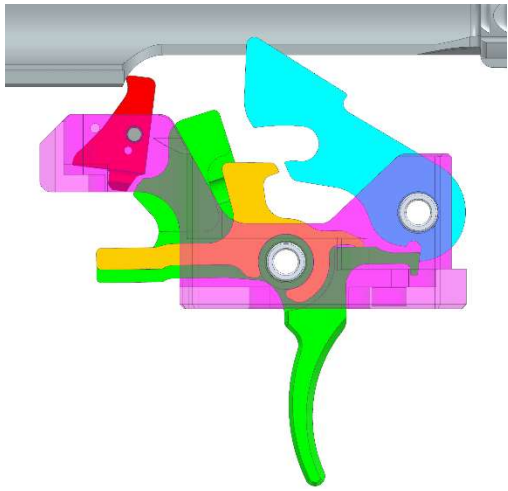
78. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

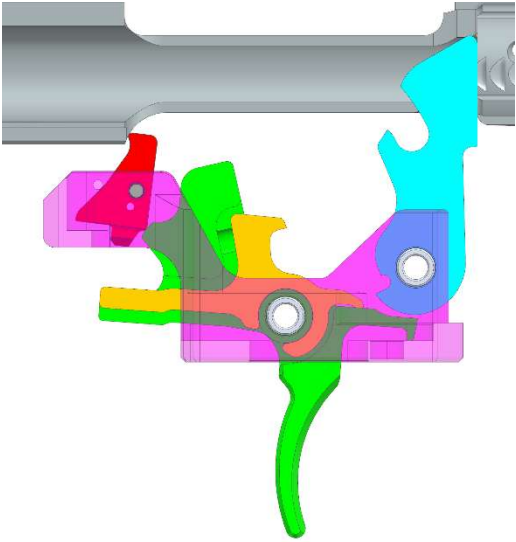
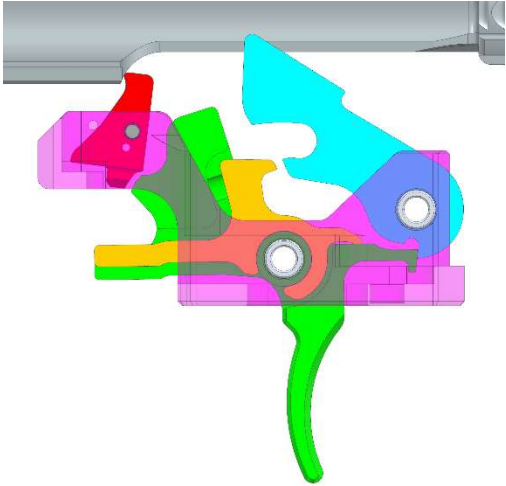
79. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '807 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, offering for sale, selling, and/or importing into the United States unlicensed products in a manner that infringes the '807 patent. Such unlicensed products include the Disruptor.

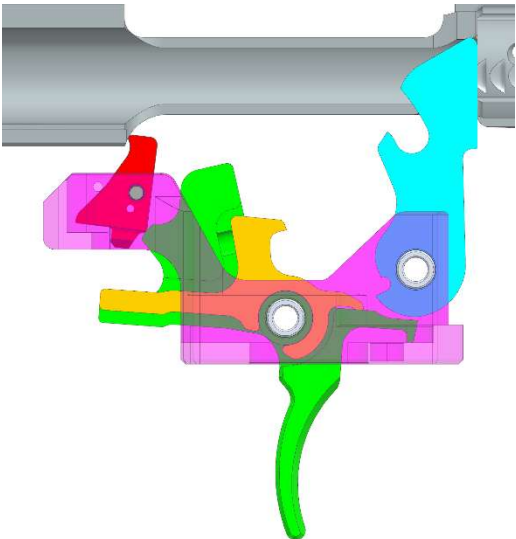
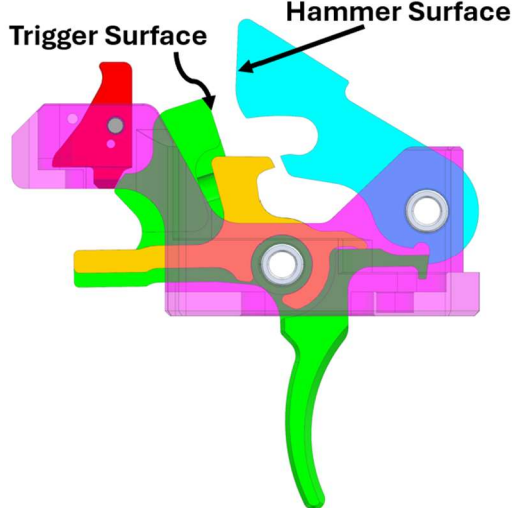
80. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '807 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

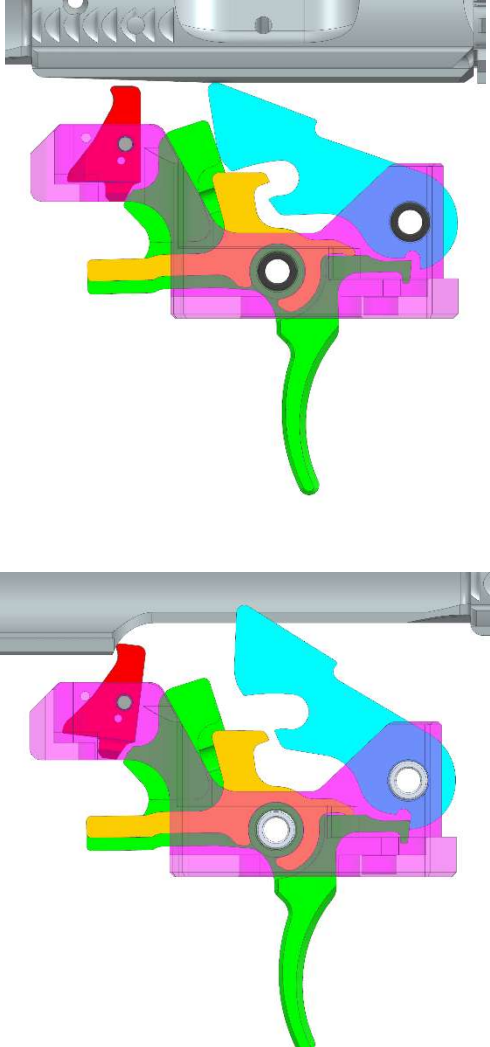
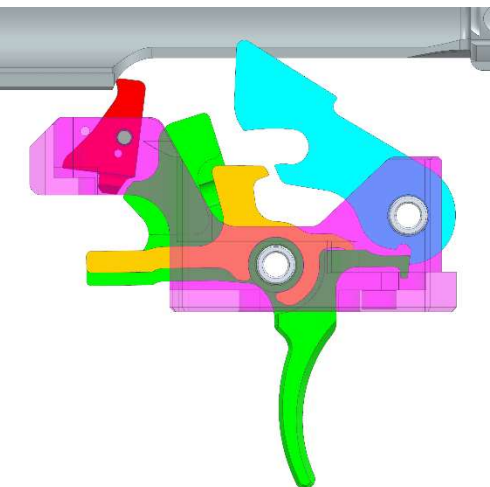
81. An exemplary comparison of the Disruptor, when assembled and used as intended, with claim 1 of the '807 patent is illustrated in the chart below:

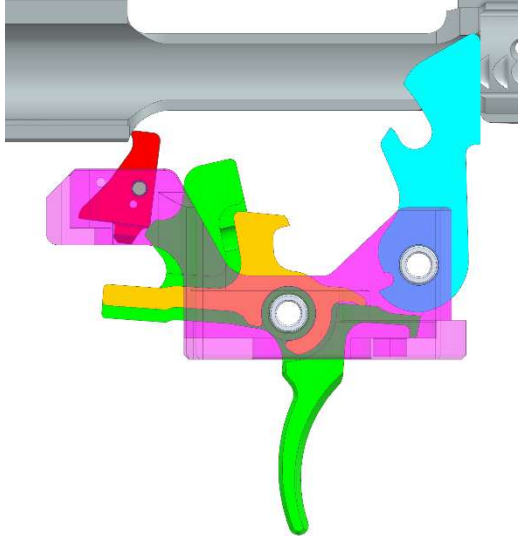
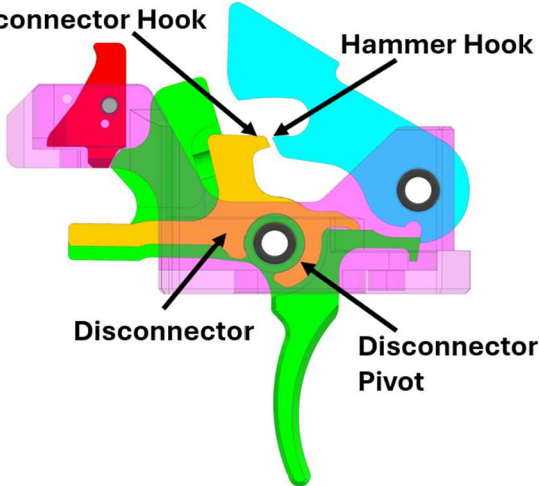
'807 Patent Claim 1	The Disruptor
A firearm trigger mechanism comprising:	The Disruptor is a firearm trigger mechanism.  https://www.2aninja.com/product-page/partisan-disruptor-3-position-frt
a hammer having a sear catch and a hook and adapted to be mounted in a fire control mechanism pocket of a receiver to pivot on a transverse hammer pivot axis	The Disruptor includes a hammer (blue) that has a sear catch and a hook for engaging a disconnecter. It is mounted in the fire control mechanism pocket to pivot on a transverse hammer pivot axis between set and released positions. The hammer is pivoted rearward by rearward movement of a bolt carrier.

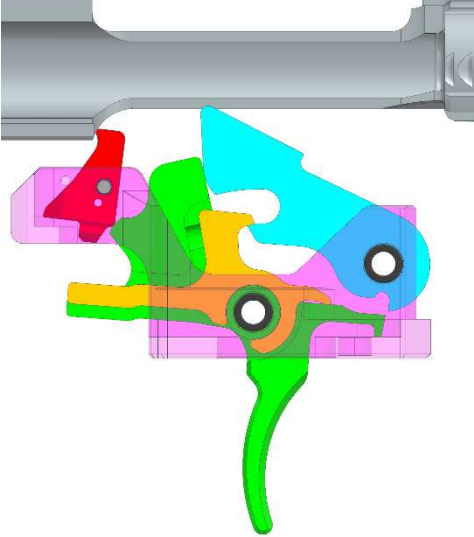
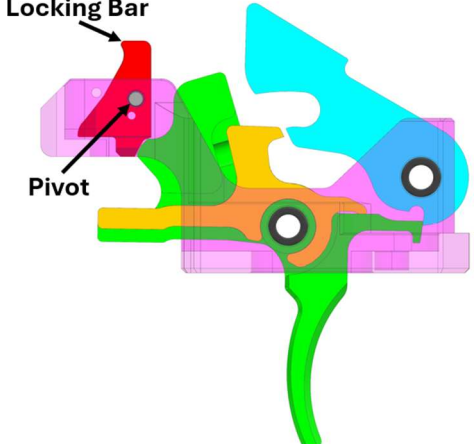
'807 Patent Claim 1	The Disruptor
between set and	 Hammer (Plaintiff-generated renderings of the Disruptor here and below)  Set Position

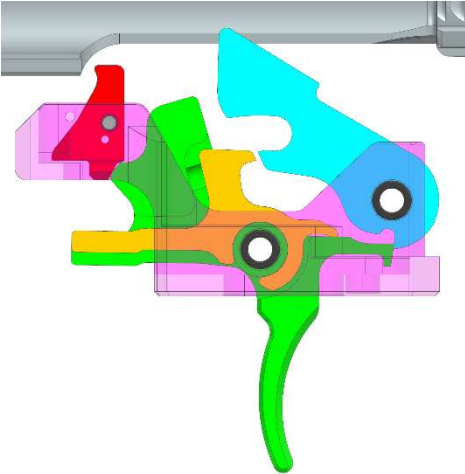
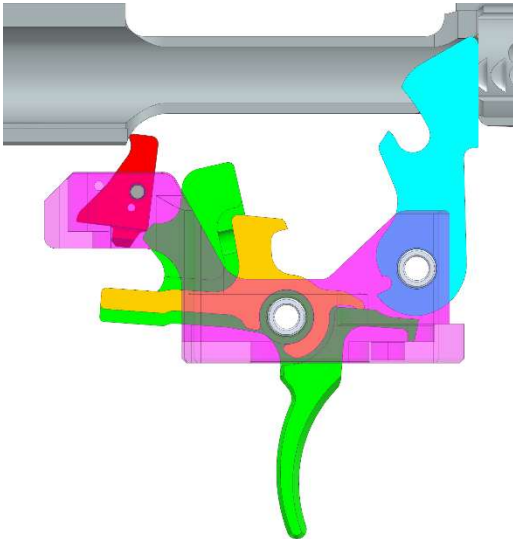
'807 Patent Claim 1	The Disruptor
released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,	 The diagram shows a cross-sectional view of a firearm's internal mechanism. A hammer (red) is pivoted rearward, held in place by a bolt carrier (grey) and a sear (green). The trigger member (green) is in a released position, pivoted on a transverse trigger member pivot axis. The disruptor (cyan) is in a released position, pivoted on a transverse disruptor pivot axis. The hammer is adapted to be pivoted rearward by rearward movement of a bolt carrier. 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	The Disruptor includes a trigger member (green) that has a sear and is mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis  The diagram shows a cross-sectional view of the same firearm mechanism as above, but in a different state. The hammer (red) is now pivoted forward, striking the trigger member (green). The trigger member (green) is now in a set position, pivoted on a transverse trigger member pivot axis. The disruptor (cyan) is now in a set position, pivoted on a transverse disruptor pivot axis. The hammer is adapted to be pivoted forward by forward movement of a bolt carrier. Set Position

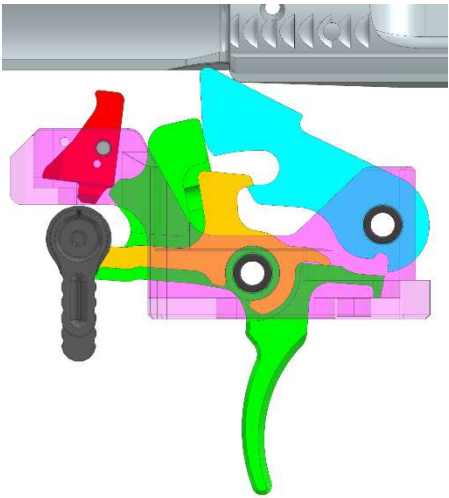
'807 Patent Claim 1	The Disruptor
and released positions, said trigger member having a surface positioned to be contacted by a surface of said hammer during rearward pivoting of said hammer to cause said trigger member to be forced to said set position,	 Released Position The trigger member (green) has a surface positioned to be contacted by a surface of the hammer (blue)  Trigger Surface Hammer Surface The hammer (blue) pivots rearward causing the trigger (green) to be forced to the set position

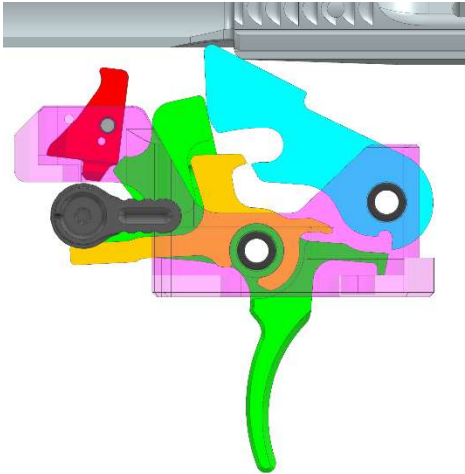
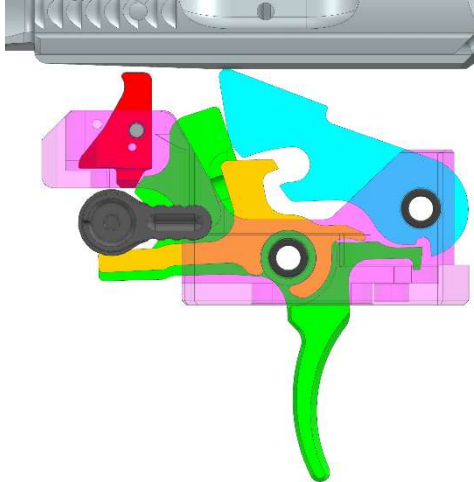
'807 Patent Claim 1	The Disruptor
	
wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member	The sear and sear catch are engaged in the set position 

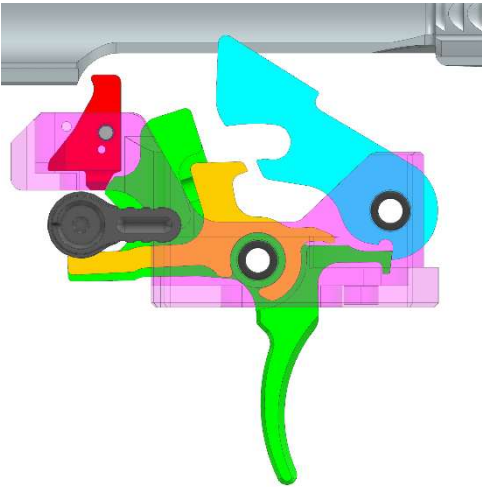
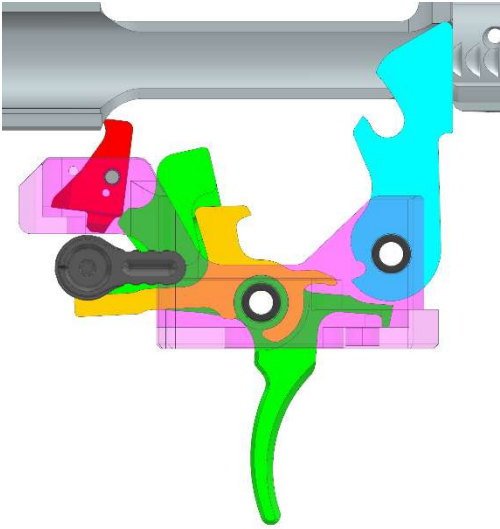
'807 Patent Claim 1	The Disruptor
and are out of engagement in said released positions of said hammer and trigger member,	Set Position The sear and sear catch are out of engagement in the released position  Released Position
a disconnecter having a hook for engaging said hammer hook	The Disruptor has a disconnecter (orange) that has a hook for engaging the hammer (blue) hook  Disconnecter Hook Hammer Hook Disconnecter Disconnecter Pivot
and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis,	The disconnect is mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis

'807 Patent Claim 1	The Disruptor
	
a locking member adapted to be movably mounted in the fire control mechanism pocket, said locking member being movable between a first position at which said locking member mechanically blocks said trigger member from moving to said released position	The Disruptor has a locking member (red) that is movably mounted in the fire control mechanism pocket and it is movable between a first position and a second position.  When the locking bar (red) is in the first position, the locking member blocks the trigger (green) from being pulled

'807 Patent Claim 1	The Disruptor
	 First position mechanically blocked
and a second position at which said locking member does not mechanically block said trigger member allowing said trigger member to be moved to said released position, said locking member spring biased toward said first position and adapted to be moved against said spring bias to said second position by contact from the bolt carrier during forward movement of the bolt carrier as the bolt carrier reaches a substantially in-battery position, and	When the locking bar (red) is in the second position, it does not prevent the trigger (green) from being pulled  Second position not mechanically blocked The locking member (red) is spring biased toward the first position and is moved against the spring bias to the second position by contact of the bolt carrier during forward movement of the bolt carrier as the bolt carrier reaches a substantially in-battery position

'807 Patent Claim 1	The Disruptor
a safety selector adapted to be movably mounted in the fire control mechanism pocket to move between safe, standard semi-automatic, and forced reset semi-automatic positions,	The Disruptor includes a safety selector that is mounted in the fire control mechanism pocket of a receiver to pivot between safe, standard semi-automatic, and forced reset semi-automatic positions. 
whereupon in said standard semi-automatic position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnect hook catches said hammer hook, at which time a user must manually release said trigger member to free said hammer from said disconnecter 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	While in the standard semi-automatic position rearward movement of the bolt carrier causes the hammer (blue) to pivot and the disconnect (orange) hook catches the hammer hook  (Standard semi-automatic position)
whereupon in said forced reset semi-automatic position, rearward movement of the bolt carrier causes rearward pivoting of said hammer causing said trigger member to be forced to said set position,	When the Disruptor is in the forced reset semi-automatic position rearward movement of the bolt carrier causes the hammer (blue) to pivot which causes the trigger (green) to be forced to the set position.

'807 Patent Claim 1	The Disruptor
said safety selector preventing said disconnecter hook from catching said hammer hook,	 Trigger pulled to the rear, hammer first touches the trigger  Hammer has now caused the trigger to move to the reset position The safety selector prevents the disconnecter (orange) hook from catching the hammer (blue) hook.

'807 Patent Claim 1	The Disruptor
	 Set Position
and thereafter when the bolt carrier reaches the substantially in-battery position the user can pull said trigger member to fire the firearm without manually releasing said trigger member.	When the bolt carrier reaches a substantially in-battery position the user can pull the trigger (green) without manually releasing pressure off the trigger. 

82. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '807 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 Disruptor while selling products.

83. On information and belief, Defendants know or should know that such activities induce others to directly infringe at least claim 1 of the '807 Patent.

84. On information and belief, Defendants also contribute to the infringement of the '807 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 Disruptor, such as the trigger assembly. 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 forcibly reset a trigger mechanism and infringe the '807 Patent.

85. Defendants have engaged in egregious infringement behavior with knowledge of the '807 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 '807 Patent and that the '807 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 '807 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 '807 Patent.

86. By its actions, Defendants have injured Plaintiffs and are liable to Plaintiffs for infringement of the '807 Patent pursuant to 35 U.S.C. § 271.

87. By its actions, Defendants' infringement of the '807 Patent has irreparably injured Plaintiffs. Unless such infringing acts are enjoined by this Court, Plaintiffs will continue to suffer additional irreparable injury.

88. By its actions, Defendants' infringement of the '807 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

89. Defendants' infringement of the '807 patent is exceptional and entitles Plaintiffs to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

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

91. 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.

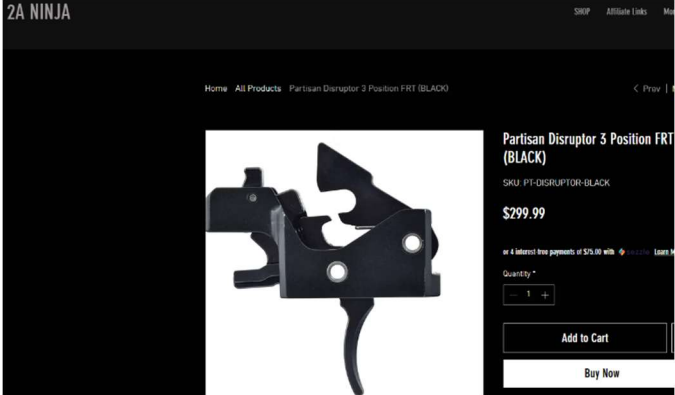
COUNT V — INFRINGEMENT OF THE '403 PATENT

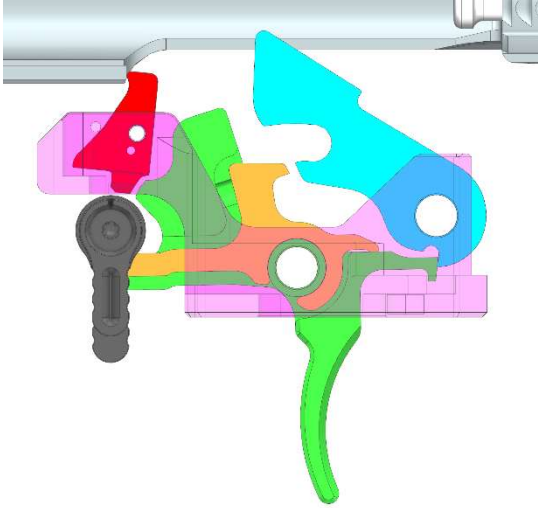
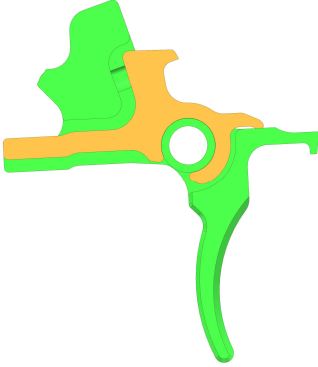
92. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

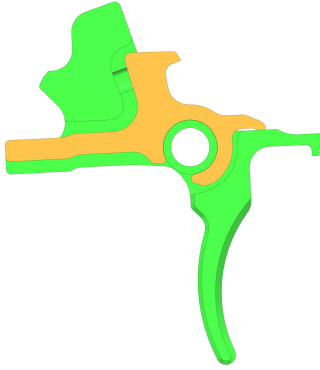
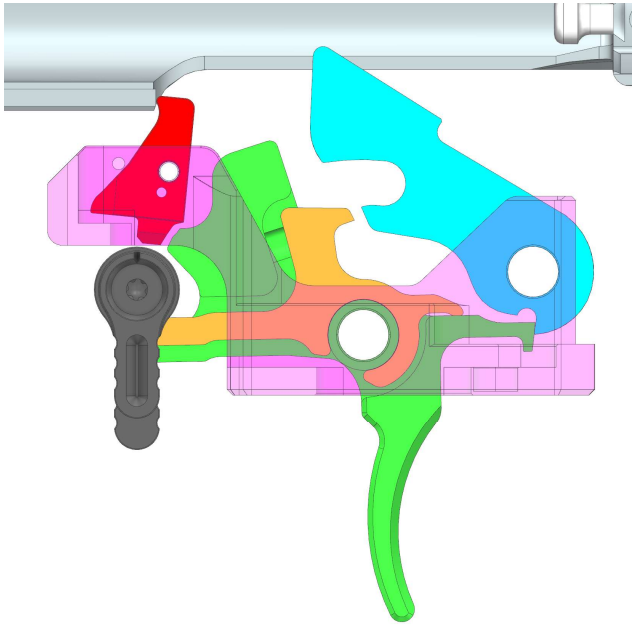
93. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '403 patent, including but not limited to claim 38, literally and/or under the doctrine of equivalents, by among other things, making, using, 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 Disruptor.

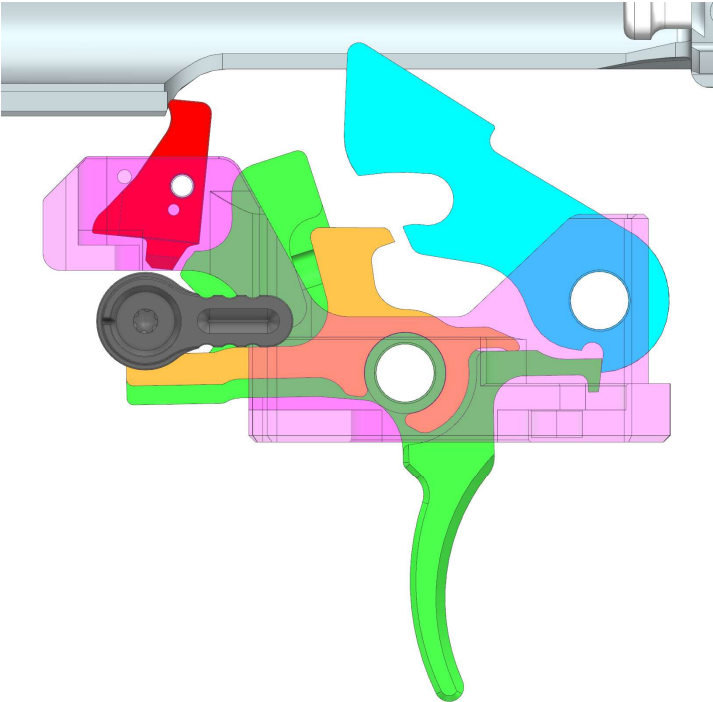
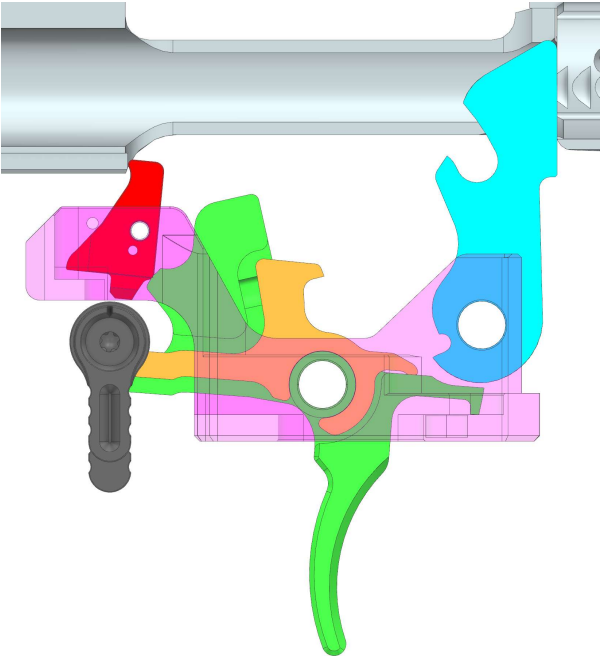
94. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '403 patent, including but not limited to claim 38, literally and/or under the doctrine of equivalents.

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

'403 Patent Claim 38	The Disruptor
38. A forced reset trigger mechanism, comprising:	When installed and used as directed, the Disruptor is part of a forced reset trigger mechanism.   https://www.2aninja.com/product-page/partisan-disruptor-3-position-frt Disruptor

'403 Patent Claim 38	The Disruptor
a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;	The Disruptor has a hammer (blue) that has a hammer hook and pivots on a transverse axis.  Disruptor (Installed) (Plaintiff-generated renderings of Disruptor here and below)
a disconnector having a disconnector hook and adapted to pivot on a transverse disconnector pivot axis;	The Disruptor has a disconnector (orange) which has a disconnector hook and pivots on a transverse disconnector pivot axis.  Disconnector (orange)

'403 Patent Claim 38	The Disruptor
a trigger member; and	The Disruptor has a trigger member (green) which has a disconnecter hook and pivots on a transverse disconnecter pivot axis  Trigger Member (green)
a safety selector adapted to be movable between a standard semi-automatic position	The Disruptor has a safety selector adapted to be movable between a (standard semi-automatic) position,  Disruptor (installed) in Standard Semi-Automatic Position

'403 Patent Claim 38	The Disruptor
and a forced reset semi-automatic position,	. . . and a forced reset semi-automatic position,  Disruptor (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 (green) is rearwardly actuated. 

96. 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 Devices while selling products.

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

98. 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 can and lever arm or the trigger assembly. 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 forcibly reset a trigger mechanism and infringe the '403 Patent.

99. 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.

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

101. By its 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.

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

103. 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.

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

105. 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.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgement 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. 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 infringement or contributing to the infringement of each of the Asserted Patents during the pendency of this case, or other such equitable relief as the Court determines is warranted;

e. 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 infringement or contributing to the infringement of each of the Asserted Patents, or other such equitable relief as the Court determines is warranted;

f. 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;

g. An award of all other damages permitted by 35 U.S.C. § 284, including increased damages up to three times the amount of compensatory damages found;

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

i. 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

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

DATED: May 29, 2026

Respectfully submitted,

STINSON LLP

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