

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**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.**

**WOJTEK LLC, a New Hampshire  
limited liability company, d/b/a Wojtek  
Weaponry,**

**and**

**NATHAN WOLANYK, an individual,**

**Defendants.**

CASE NO. \_\_\_\_\_

**COMPLAINT FOR PATENT AND  
TRADEMARK INFRINGEMENT**

**JURY TRIAL DEMANDED**

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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 Wojtek LLC d/b/a Wojtek Weaponry and Nathan Wolanyk (collectively, “Defendants”) of infringing U.S. Patent Nos. 12,038,247, 12,031,784, 12,529,538, 12,578,159, 10,514,223, 11,724,003, 12,036,336, 12,274,807, 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, Wojtek LLC d/b/a Wojtek Weaponry is a limited liability company organized under the laws of New Hampshire with an address of 373 S Willow St, 249, Manchester, NH 03103.

5. Upon information and belief, Nathan Wolanyk is an individual residing at 270 Armory Street, 18, Manchester, NH 03103, who is the owner or an owner of Wojtek LLC and directs its operations, including directing Wojtek LLC to sell products in violation of the Asserted Patents.

### **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 (i) direct, contributory, and induced infringement of U.S. Patent Nos. 12,038,247 (“the ’247 Patent”), 12,031,784 (“the ’784 Patent”), 12,529,538 (“the ’538 Patent”), 12,578,159 (“the ’159 Patent”), 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”); and (ii) 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 ’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 E.

16. 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 F.

17. 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 G.

18. 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 H.

19. 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 I.

20. 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").

21. RBTM is the owner, and Rare Breed has the exclusive right to enforce the trademark FRT® and variations thereon ("the FRT Marks"), including the right to enforce the marks against infringers. Since at least 2020, the FRT® mark has been used by Plaintiff Rare Breed to identify a unique trigger 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 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."

22. Rare Breed is the exclusive licensee of the Asserted Patents and the FRT Marks.

23. 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.

24. 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

25. 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.

26. 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.

27. 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.

28. 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.

29. 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.

30. 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.

31. 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.

32. 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.

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

### **THE INFRINGING DEVICES**

34. 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**

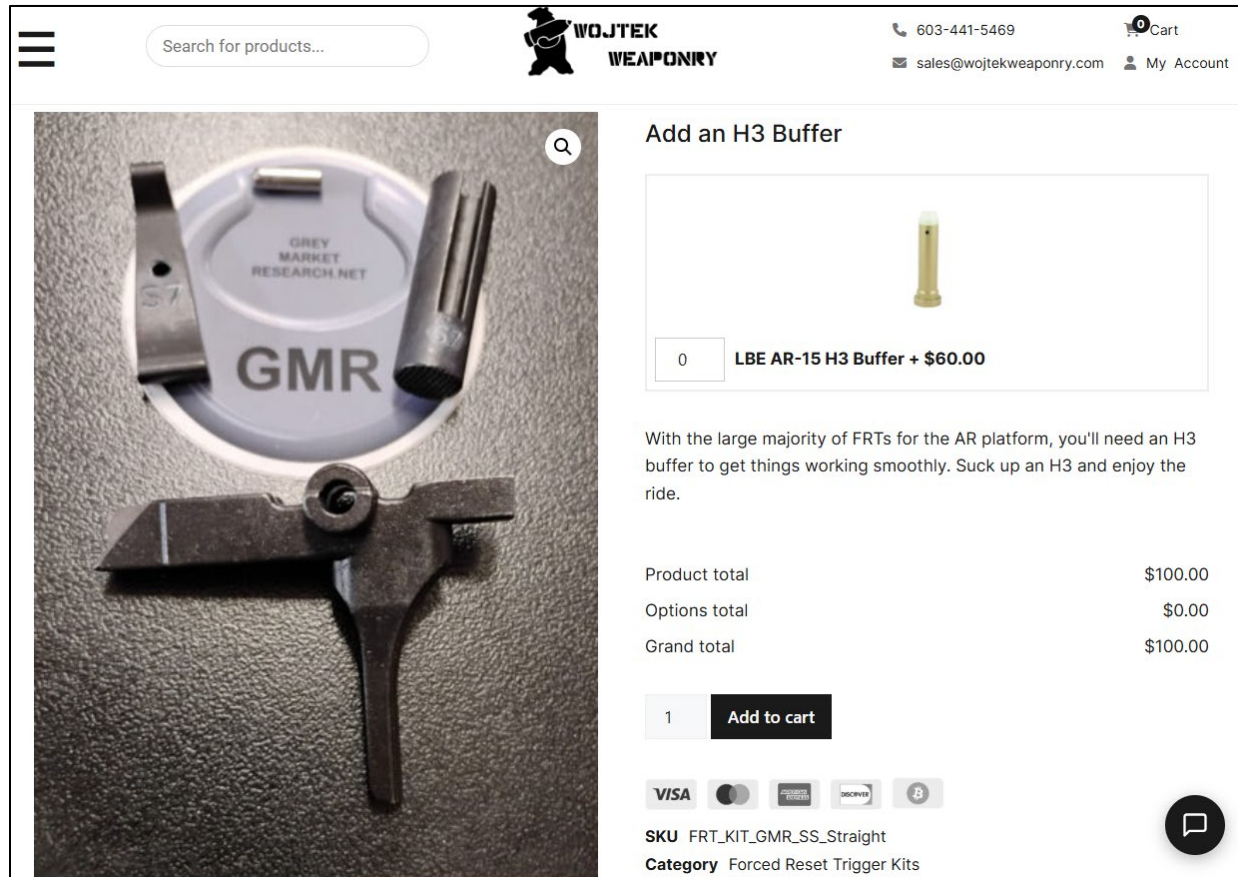
35. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale a (3-Position) Super Safety (“the Super Safety”), which embodies the technology claimed in at least the ’247, ’784, ’538, ’159, and ’403 Patents.

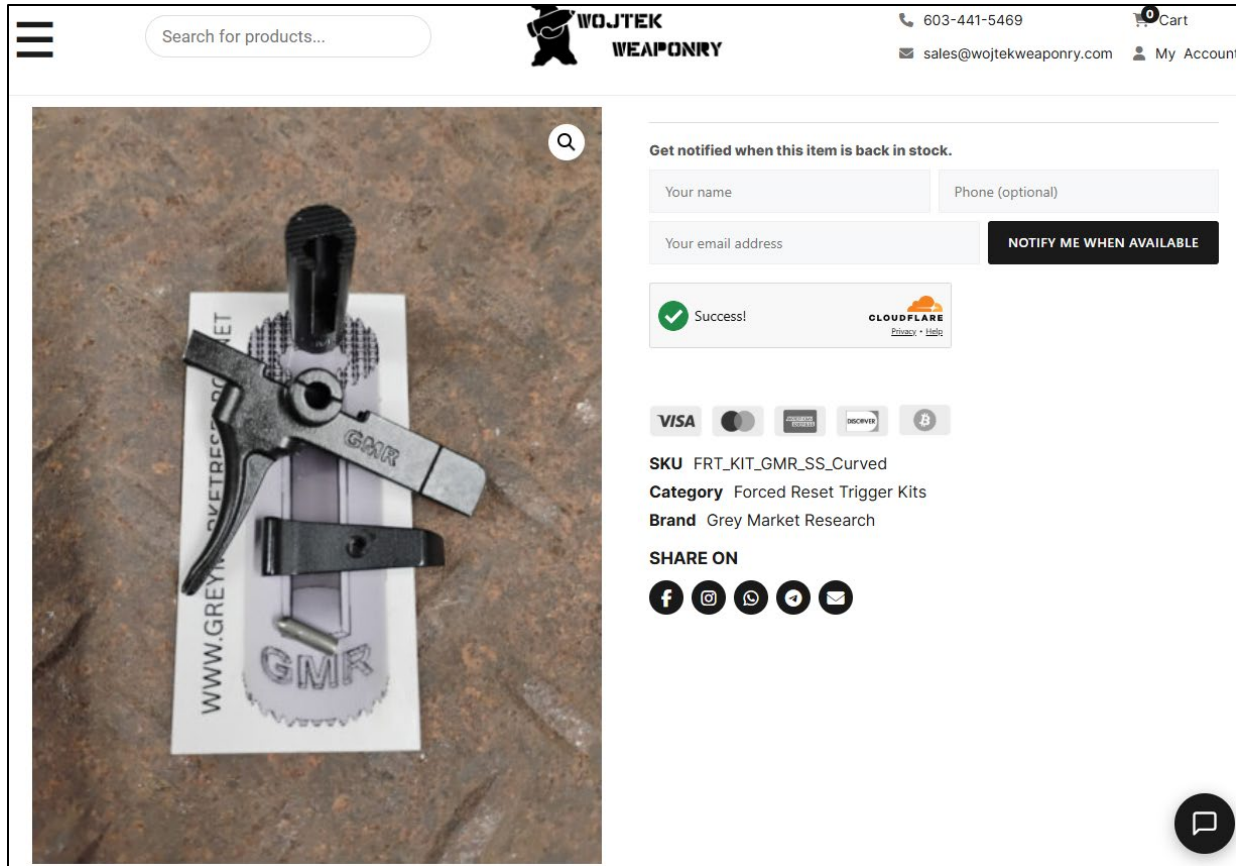
36. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the Super Safety via the website <https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits>, in multiple variants, including at least:

- 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 disconnecter, 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, disconnecter, 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, disconnecter, standard springs, and a modified trigger) preinstalled in an AR-pattern receiver.

37. Exemplary images are shown below:





38. The Super Safety can operate 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 laterally between positions.

## II. The Atrius Selector

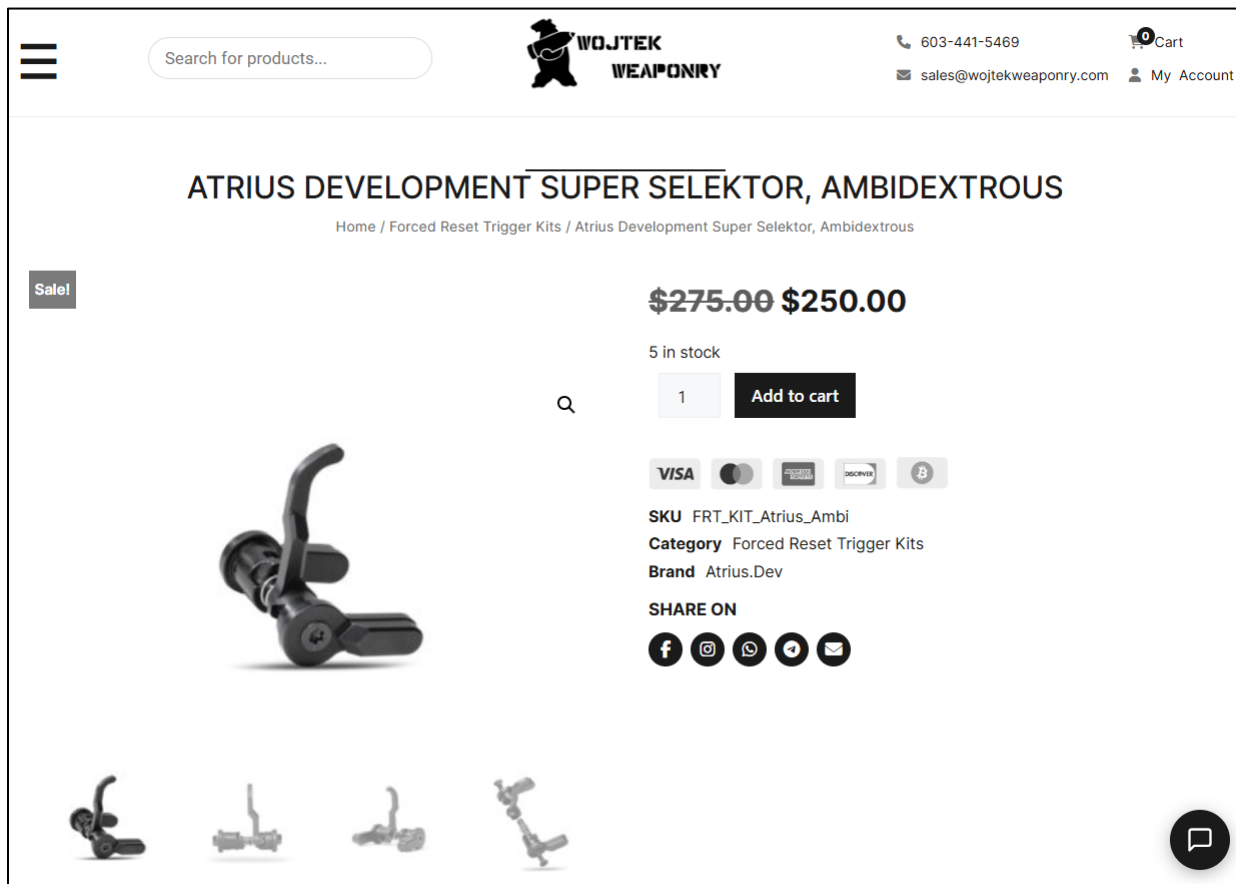
39. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale a (3-Position) “Atrius Forced Reset Selector” (“the Atrius Selector”), which embodies the technology claimed in at least the ’247, ’784, ’159, and ’403 Patents.

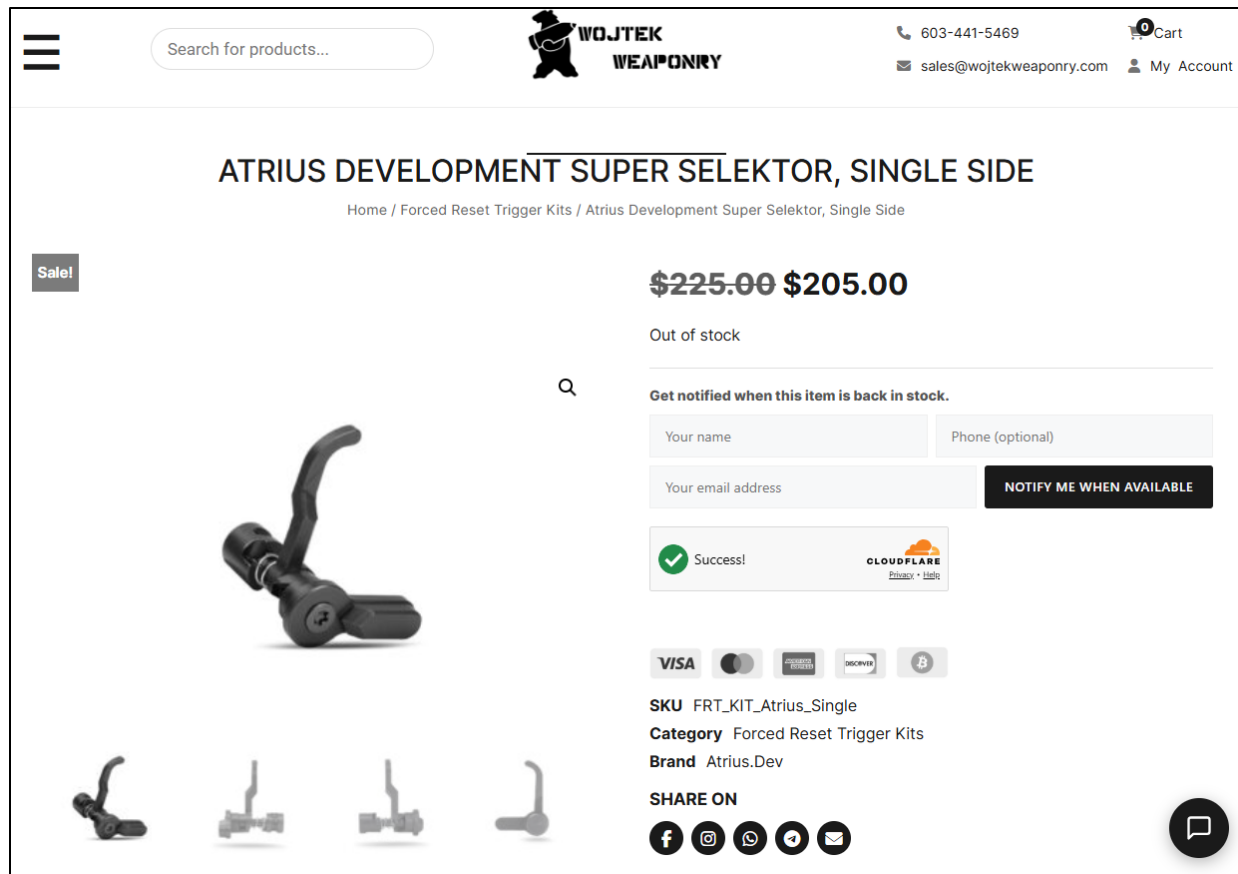
40. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the Atrius Selector via the website

<https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits>, in multiple variants, including at least:

- a. As a standalone product; and/or
- a. In conjunction with separate trigger mechanism parts; and/or
- b. Pre-installed in a receiver and/or complete firearm.

41. Exemplary images are shown below:





42. The Atrius Selector can operate 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 rotating the safety selector between positions.

### III. The ARC-Fire

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

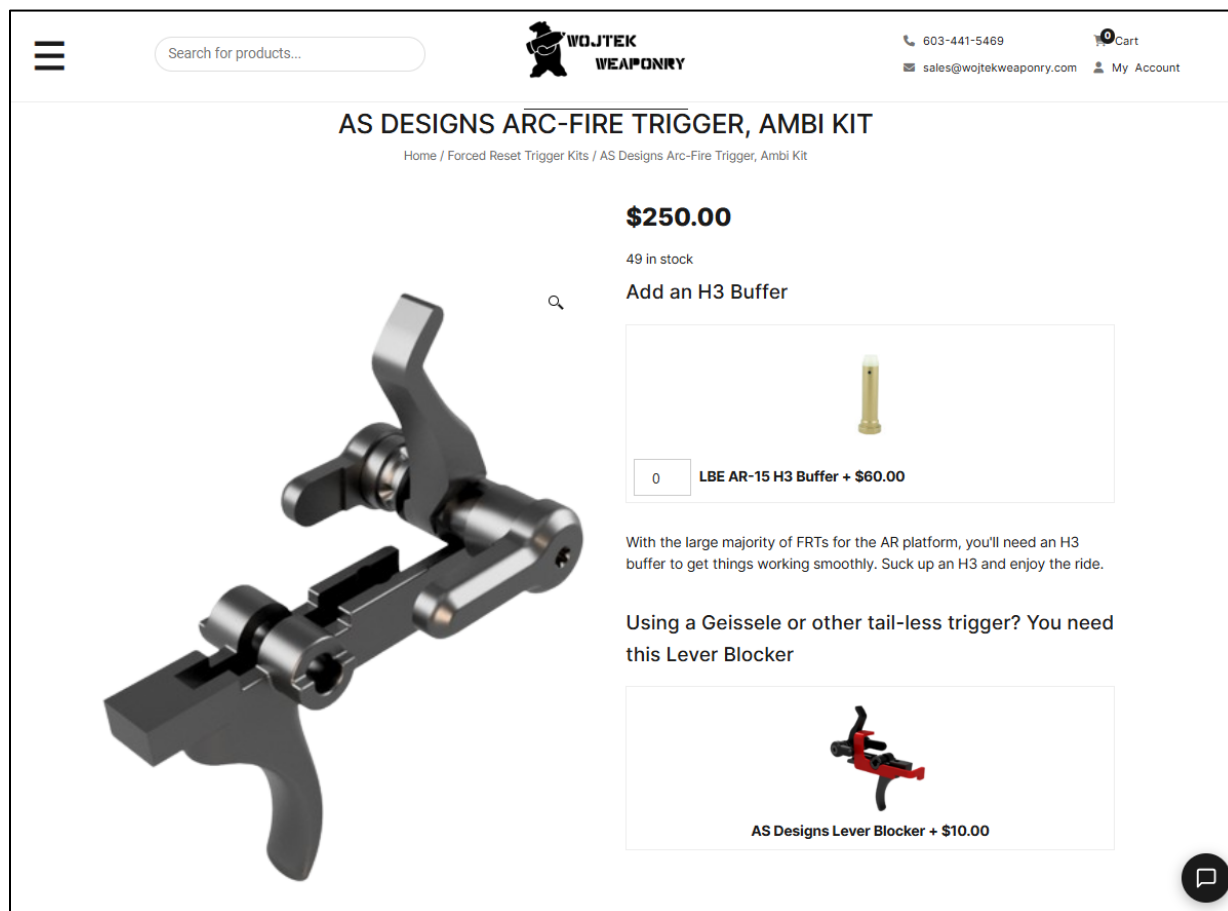
44. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the ARC-Fire via the website

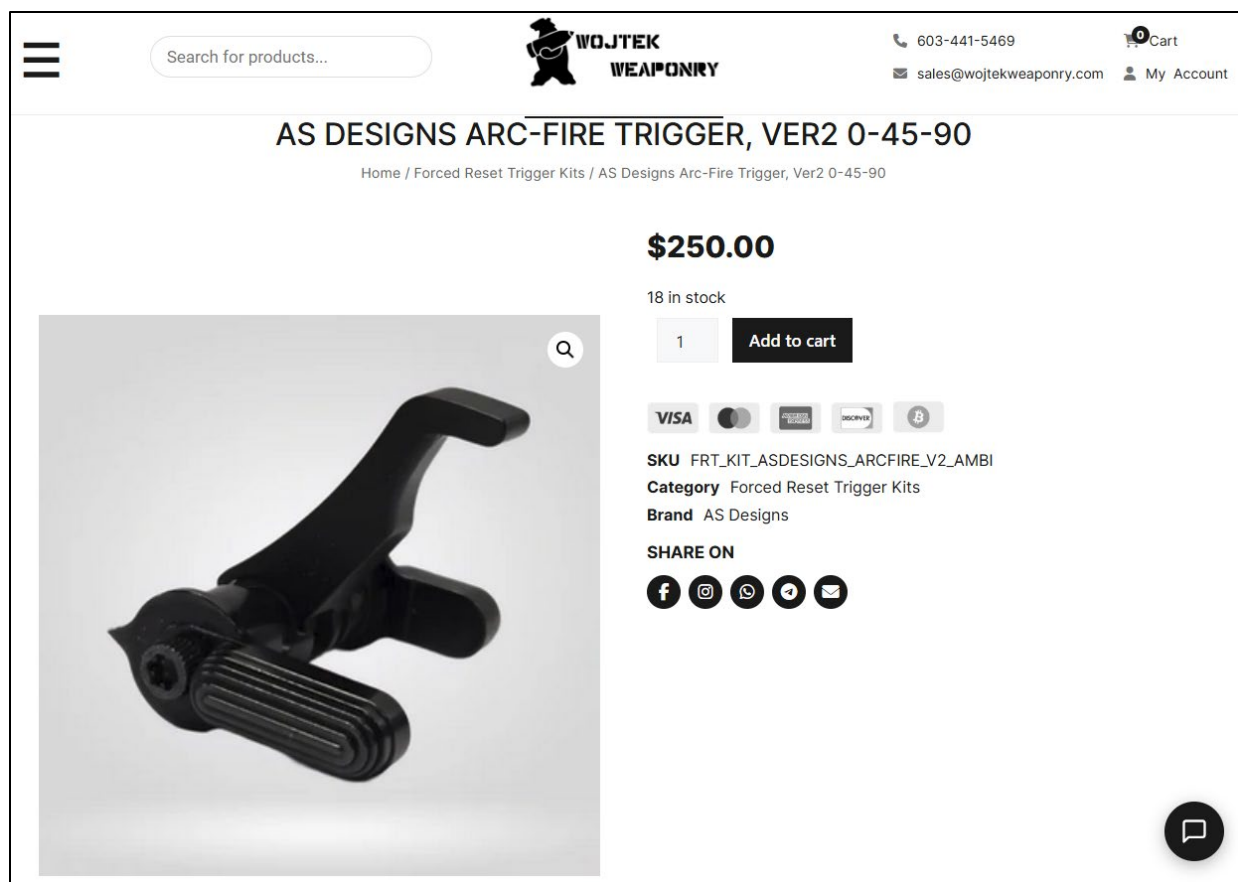


<https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits>, in multiple variants, including at least:

- a. As a standalone product; and/or
- c. In conjunction with separate trigger mechanism parts; and/or
- d. Pre-installed in a receiver and/or complete firearm.

45. Exemplary images are shown below:





46. The ARC-Fire can operate 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 rotating the safety selector between positions.

#### IV. The Disruptor

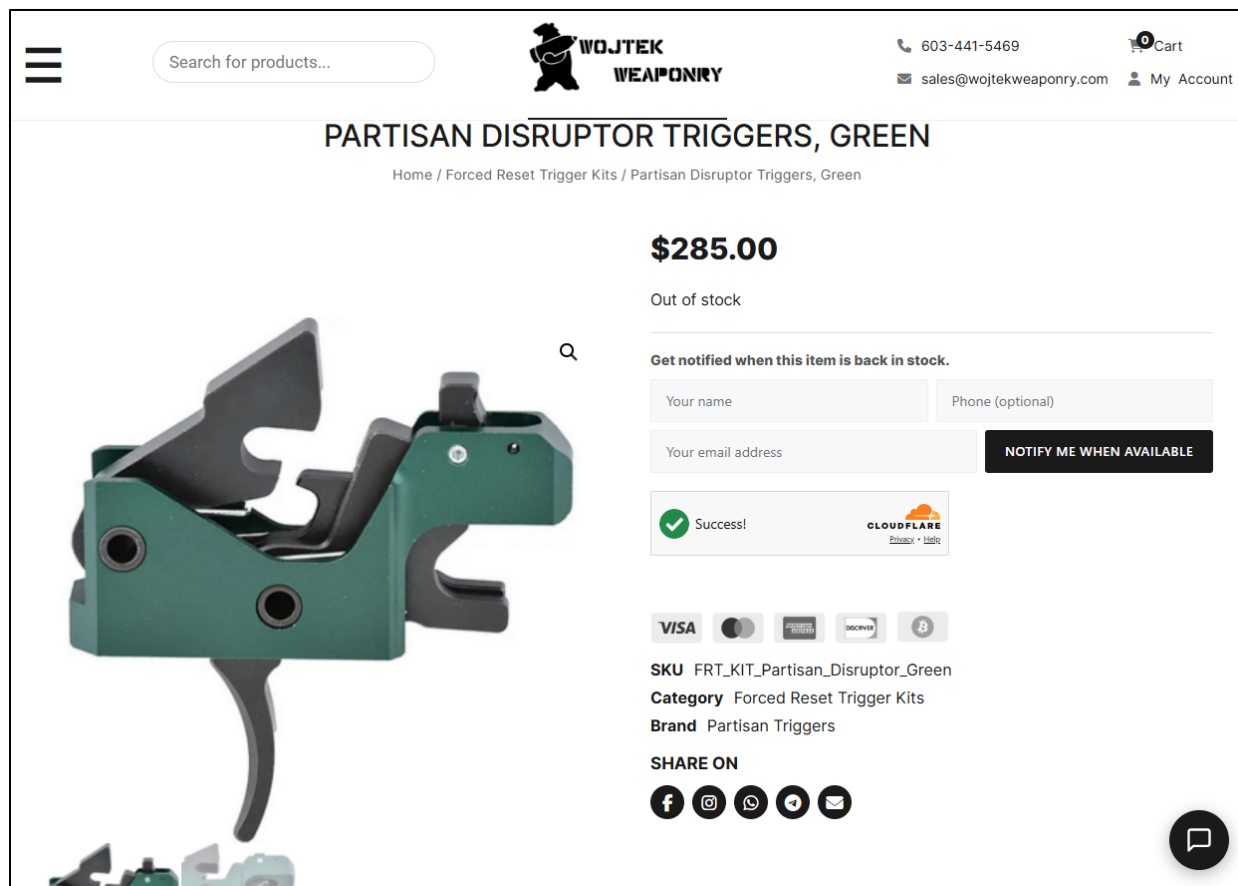
47. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale a (3-Position) Disruptor (“the Disruptor”), which embodies the technology claimed in at least the ’223, ’003, ’336, ’807, and ’403 Patents.

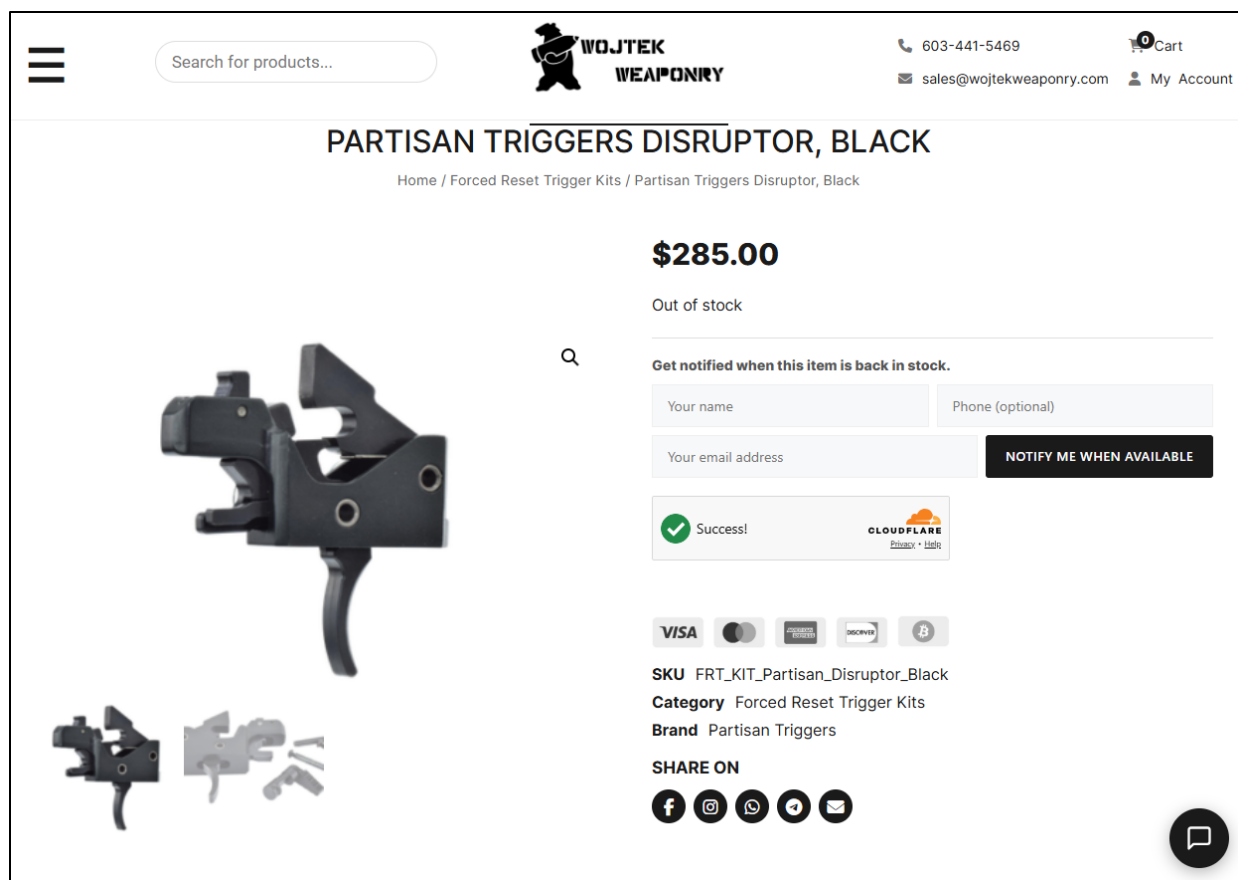
48. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the Disruptor via the website

<https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits>, in multiple variants, including at least:

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

49. Exemplary images are shown below:





50. 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.

51. When the Disruptor operates in the “forced reset” mode, the cycling of the action causes hammer contact with the trigger member to mechanically 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.

52. 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.

53. 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 mechanically moved 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.

### **INFRINGEMENT OF THE FRT MARKS**

54. 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 Marks.

55. Defendants are falsely associating their products with Plaintiffs’ well-known FRT Marks.

56. Defendants are advertising their products as “FRT” as shown at:  
<https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits>. Exemplary  
highlighted images are shown below:


FRT
3/6
What does this page say about "FRT"?
try.com
My Account

## AK-SERIES **FRT** WITH 6MM RESET BLOCK

Home / Forced Reset Trigger Kits / AK-series **FRT** with 6mm Reset Block

**\$200.00**

1 in stock

**Add to cart**

VISA   

SKU **FRT**\_Kit\_AK\_6mm\_Reset-Block

Category Forced Reset Trigger Kits

Brand Wojtek Weaponry

SHARE ON





## AS DESIGNS ARC-FIRE TRIGGER, AMBI KIT

Home / Forced Reset Trigger Kits / AS Designs Arc-Fire Trigger, Ambi Kit

**\$250.00**

49 in stock

**Add an H3 Buffer**



0 **LBE AR-15 H3 Buffer + \$60.00**

With the large majority of **FRT**s for the AR platform, you'll need an H3 buffer to get things working smoothly. Suck up an H3 and enjoy the ride.

Using a Geissele or other tail-less trigger? You need this Lever Blocker









VISA   

SKU **FRT\_KIT\_Atrius\_Ambi**

Category Forced Reset Trigger Kits

Brand Atrius.Dev

SHARE ON






Description
Additional information

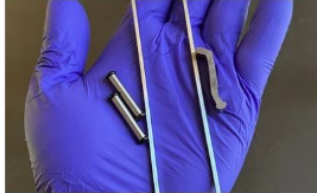
## Description

The most robust solution on the market that enables the user to have 3 positions; SAFE, SEMI (Traditional) and FULL-SEMI. This Forced Reset Selector (FRS) is compatible with mil-spec AR15 (chambered in .223/5.56/.300 BLK) fire control groups and no modifications required. The Atrius FORCED RESET SELECTOR (Single) isn't just a safety, it's an advantage.

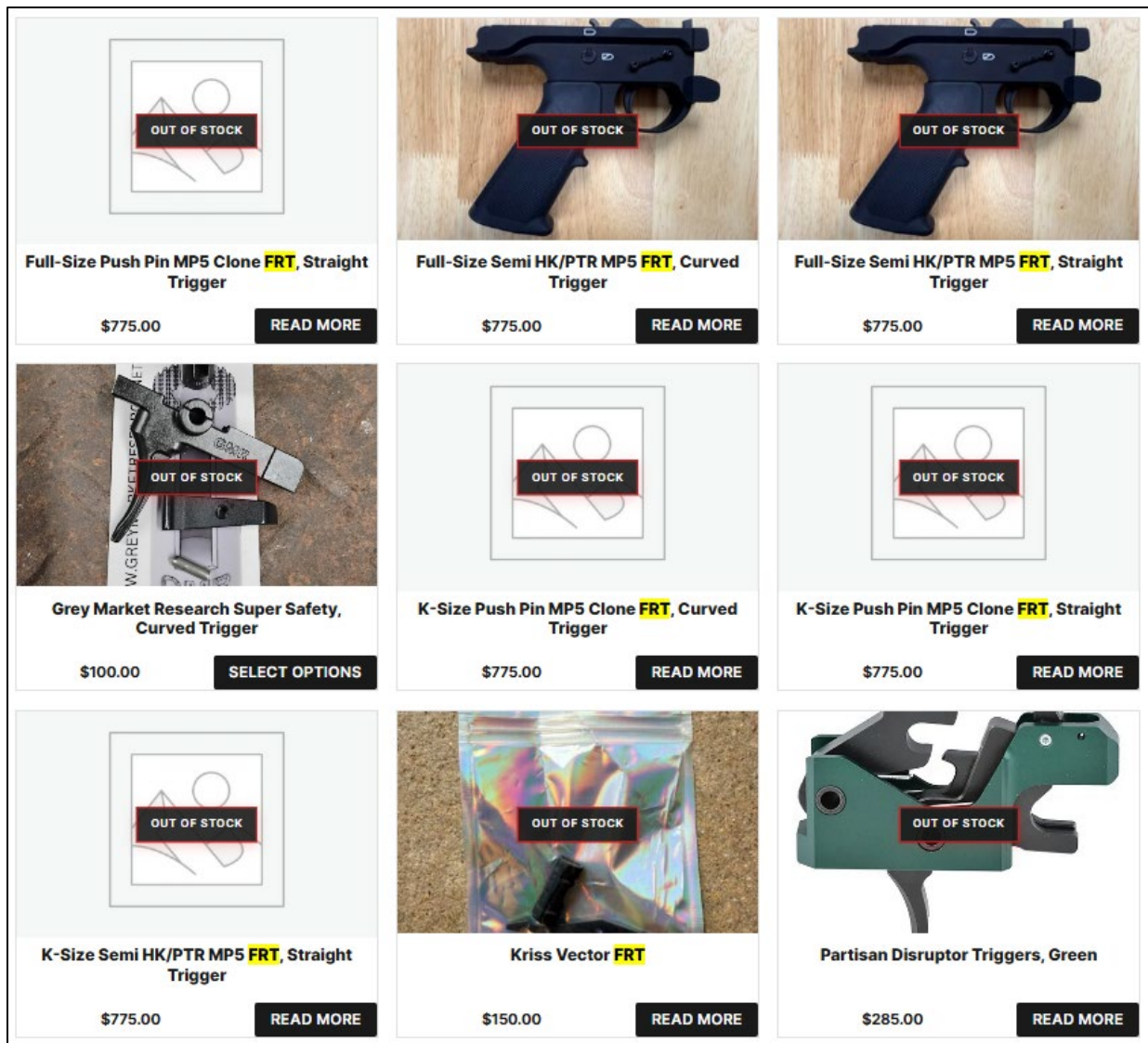
For all notes on Compatibility GO to our Compatibility Page here.

## PRODUCT FEATURES

- **Drop-In Installation** – Swap out your factory safety in minutes and experience the next level of firearm manipulation (some fitment may be required).
- **Runs with Mil-Spec Fire Control Groups** – Seamlessly integrates with standard AR fire control groups, ensuring flawless function and longevity without modification.
- **Hardcore Durability** – Crafted from heat-treated, 4140 steel and coated in a corrosion-resistant finish, the Atrius FRS laughs in the face of wear and tear. Rain, mud, sweat—it eats it all for breakfast.
- **Mechanically Leveraged Design** – Our Forced Reset Selector (FRS) reduces wear on your rifle, preserving your weapon's longevity — unlike forced-reset triggers (**FRTs**) that accelerate internal component degradation.

|                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  <p><b>Grey Market Research Super Safety, Straight Trigger</b></p> <p><del>\$100.00</del> <b>\$100.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">SELECT OPTIONS</span></p>                                                                                                     |  <p><b>K-Size Semi HK/PTR MP5 <b>FRT</b>, Curved Trigger</b></p> <p><del>\$775.00</del> <b>\$775.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">ADD TO CART</span></p>  |  <p><b>Macncheese/DB9 <b>FRT</b> Trip Bar</b></p> <p><del>\$100.00</del> <b>\$100.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">ADD TO CART</span></p>                                                                                                                                       |
| <div style="background-color: black; color: white; font-size: 0.8em; padding: 2px 5px; float: right;">Sale!</div>  <p><b>Smith M&amp;P 2.0 <b>FRT</b></b></p> <p><del>\$200.00</del> <b>\$150.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">ADD TO CART</span></p>            |  <p><b>TX-22 <b>FRT</b> Disconnecter</b></p> <p><del>\$50.00</del> <b>\$50.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">ADD TO CART</span></p>                       |  <p><b>Wise Arms Glock <b>FRT</b>, Curved Trigger</b></p> <p><del>\$85.00</del> <b>\$85.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">ADD TO CART</span></p>                                                                                                                                |
| <div style="background-color: black; color: white; font-size: 0.8em; padding: 2px 5px; float: right;">Sale!</div>  <p><b>AK-series <b>FRT</b> with 5mm Reset Block</b></p> <p><del>\$200.00</del> <b>\$200.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">READ MORE</span></p> |  <p><b>Atrius Development Super Selektor, Single Side</b></p> <p><del>\$225.00</del> <b>\$205.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">SELECT OPTIONS</span></p> | <div style="background-color: black; color: white; font-size: 0.8em; padding: 2px 5px; float: right;">Sale!</div>  <p><b>Full-Size Push Pin MP5 Clone <b>FRT</b>, Curved Trigger</b></p> <p><del>\$775.00</del> <b>\$775.00</b> <span style="background-color: black; color: white; padding: 2px 5px;">READ MORE</span></p> |





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

58. Defendants' unauthorized use of the FRT Marks 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.

59. The only reason Defendants would use the FRT Marks in connection with their products is to trade on the goodwill Plaintiffs have developed in the FRT Marks, and thus Defendants' conduct is willful.



**COUNT I — INFRINGEMENT OF THE '247 PATENT**

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

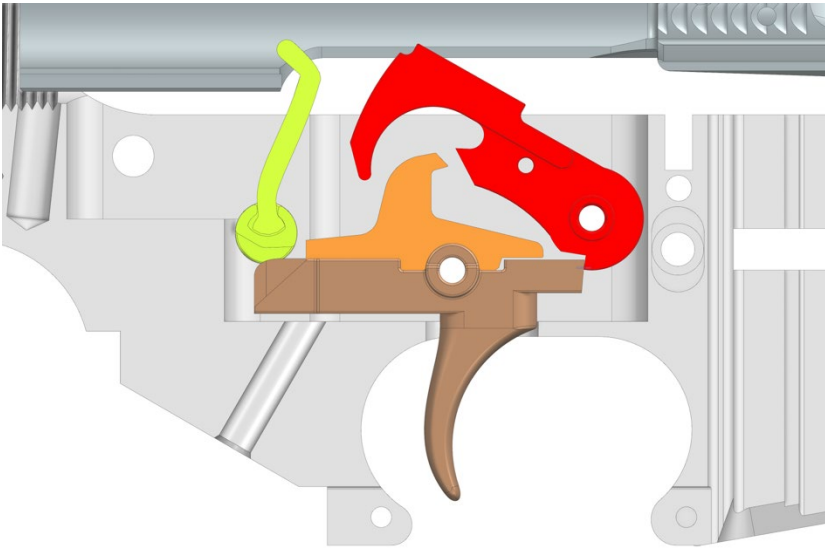
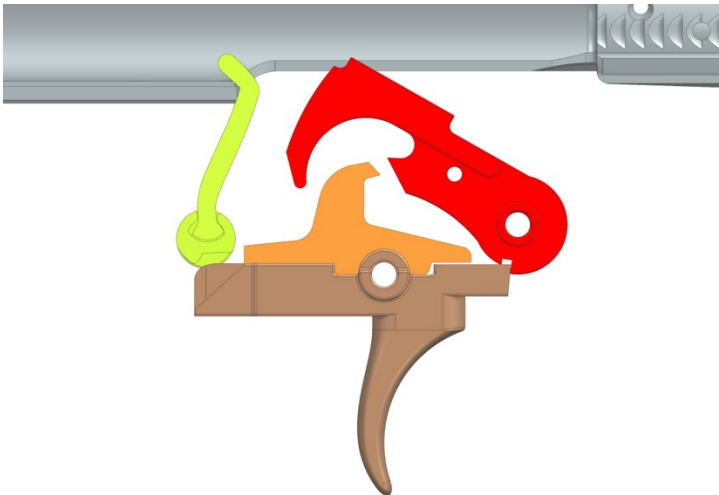
61. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents, by among other things, making, using, 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, Atrius Selector, and ARC-Fire.

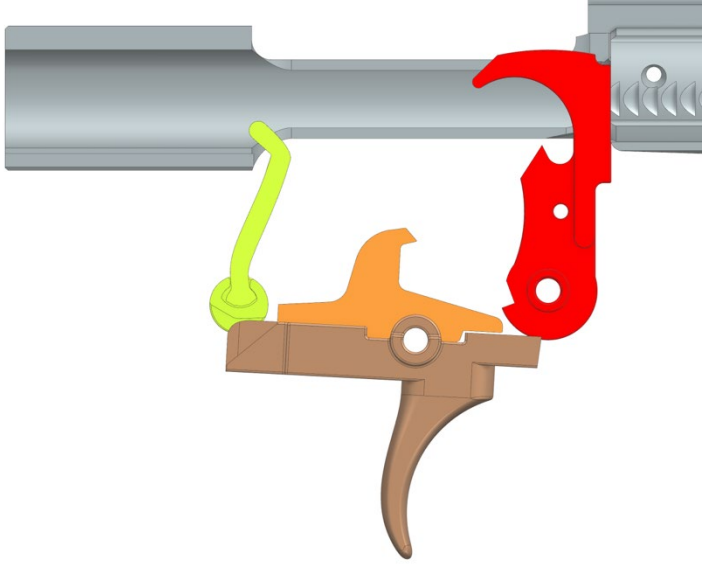
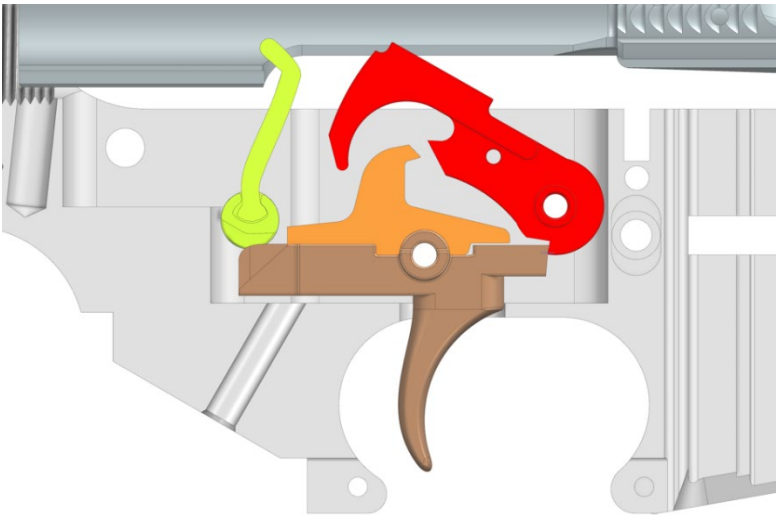
62. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents.

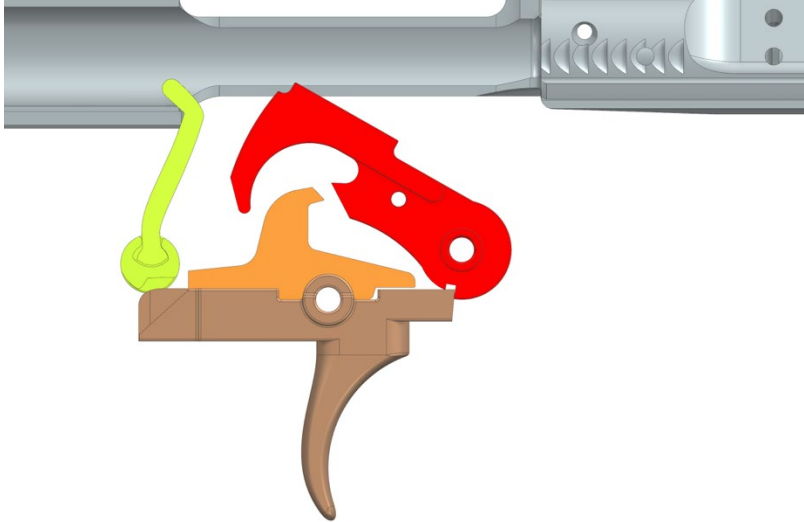
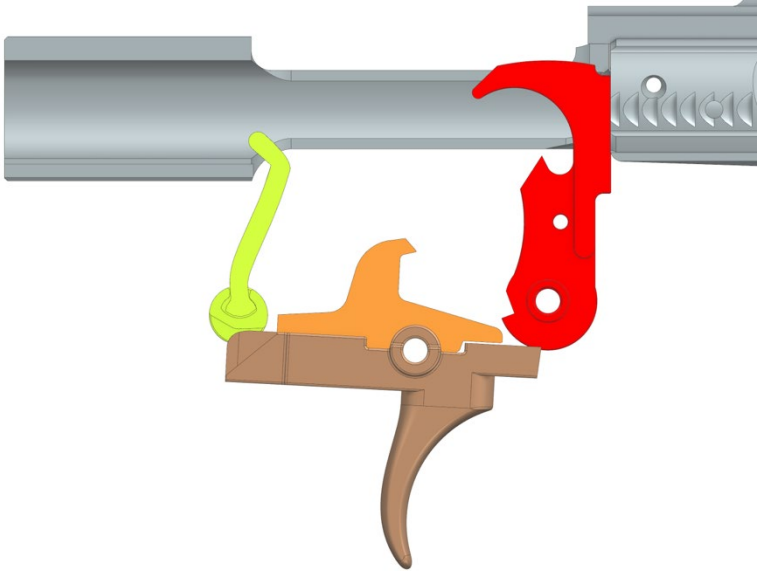
63. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

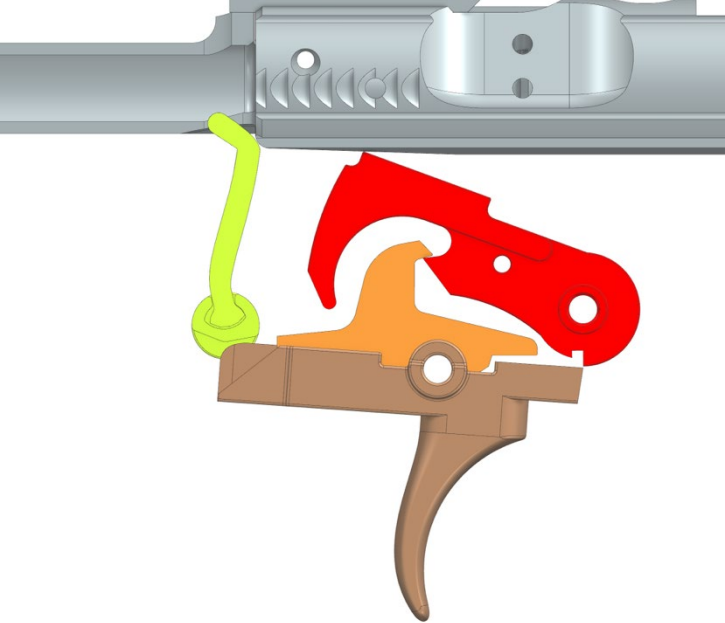
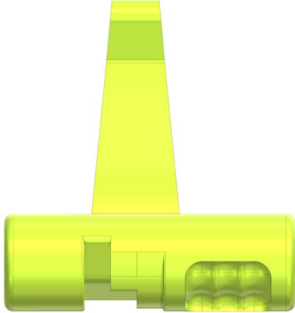
| '247 Patent, Claim 15                       | The Super Safety                                                                                                                                                                                                                 |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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. |

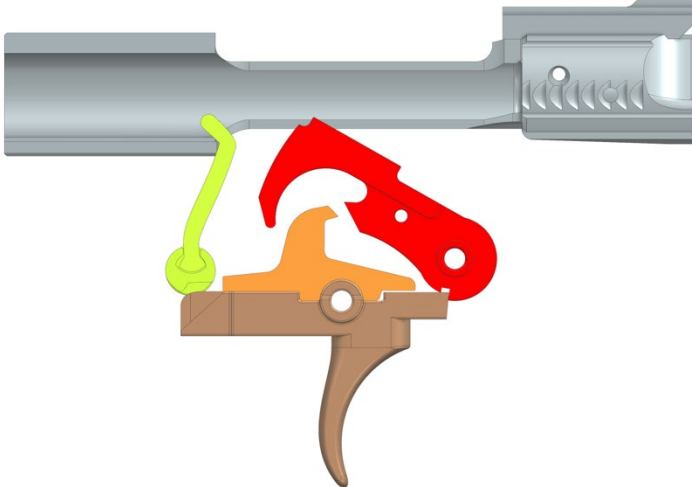
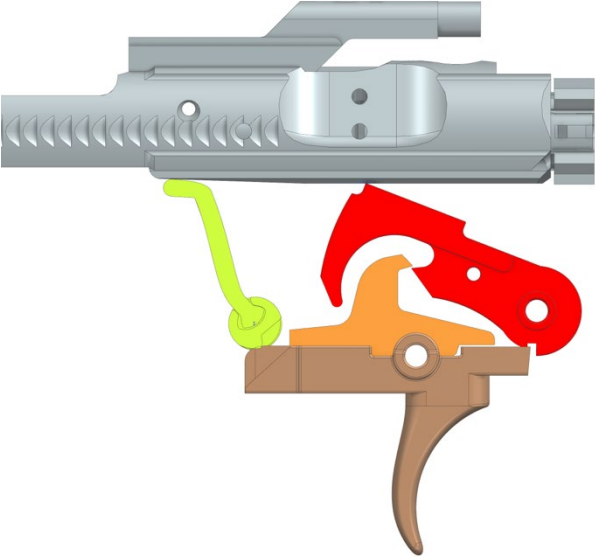
| '247 Patent, Claim 15                       | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                             |  <p data-bbox="621 1016 1393 1087"><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p>  <p data-bbox="889 1612 1123 1646"><b>The Super Safety</b></p> <p data-bbox="602 1665 1409 1738"><i>See also, Ex. J, Super Safety 3D Printed Active Trigger System v4.4, ("Super Safety Guide") at 12</i></p> |
| a hammer having a sear catch and a hook for | The Super Safety (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| '247 Patent, Claim 15                                                                                                                                             | The Super Safety                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| engaging a disconnecter and adapted to be mounted in a fire control mechanism pocket of a receiver                                                                | <p data-bbox="594 241 1307 304">has a sear catch and a hook for engaging a disconnecter (orange).</p>  <p data-bbox="625 892 1388 955">(Plaintiff-generated renderings of the Super Safety here and below)</p>                                                                                              |
| 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, | <p data-bbox="594 984 1356 1123">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.</p>  <p data-bbox="860 1669 1144 1711"><b>Hammer Set Position</b></p> |

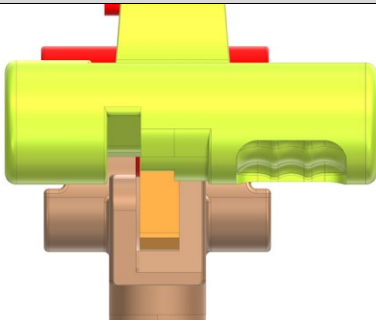
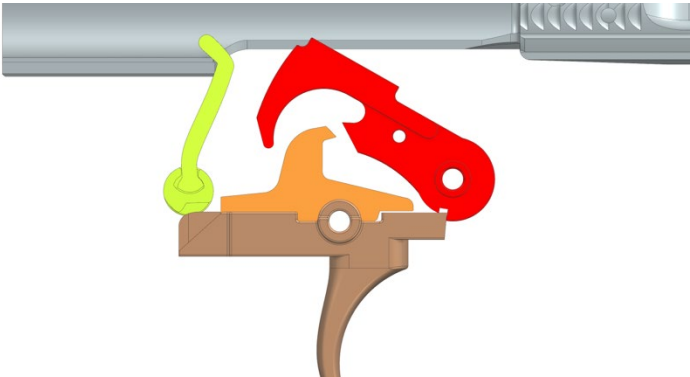
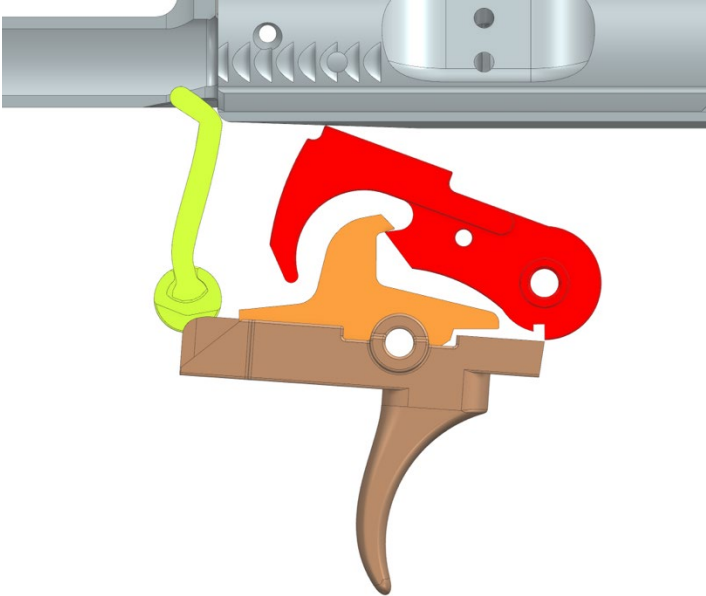
| '247 Patent, Claim 15                                                                                                                                                                                                    | The Super Safety                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                          |  <p data-bbox="824 835 1198 867"><b>Hammer Released Position</b></p>                                                                                                                                                                                                                                 |
| <p data-bbox="203 888 565 1140">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,</p> | <p data-bbox="592 888 1412 1066">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.</p>  |
| <p data-bbox="203 1623 565 1801">wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member</p>                                                                          | <p data-bbox="592 1623 1404 1728">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.</p>                                                                                                                                                                                       |

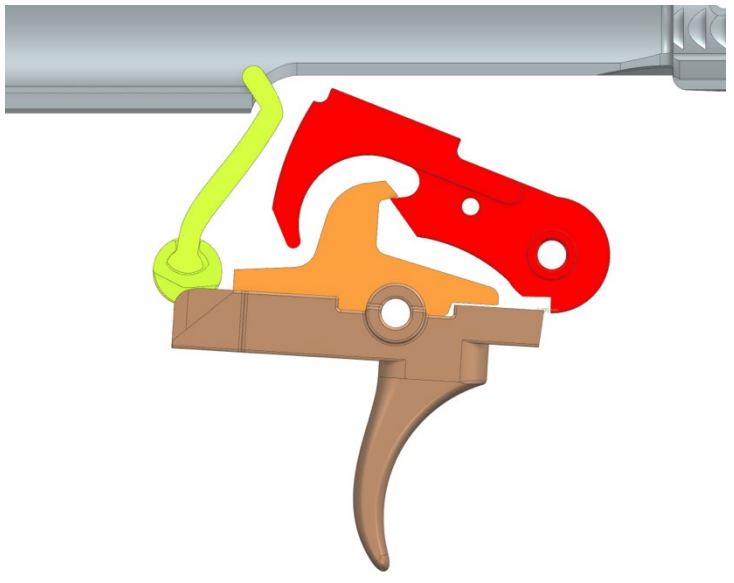
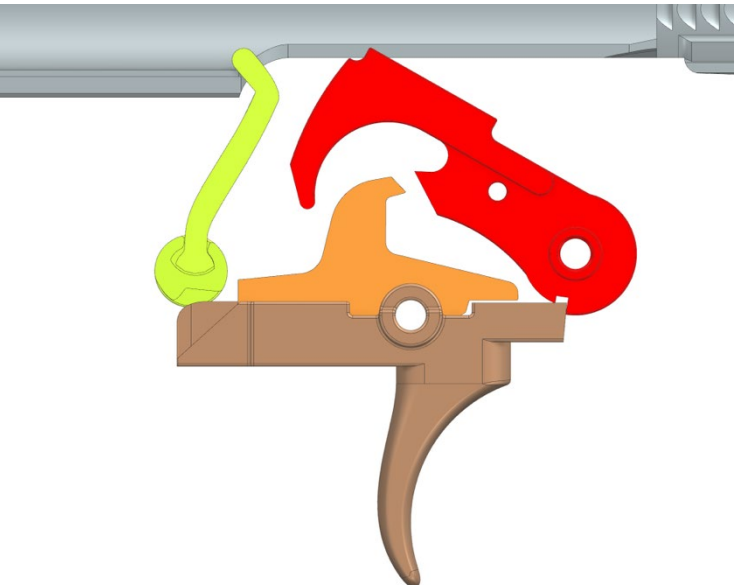
| '247 Patent, Claim 15                                                                                                                                                                                          | The Super Safety                                                                                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                |  <p data-bbox="808 758 1203 793"><b>Trigger Member Set Position</b></p>                                                                                  |
| <p data-bbox="203 821 570 961">and are out of engagement in said released positions of said hammer and trigger member,</p>                                                                                     |  <p data-bbox="769 1499 1243 1535"><b>Trigger Member Released Position</b></p>                                                                          |
| <p data-bbox="203 1560 553 1808">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,</p> | <p data-bbox="592 1560 1409 1696">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).</p> |

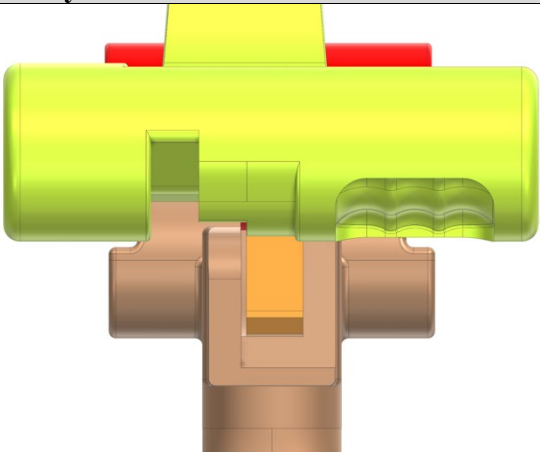
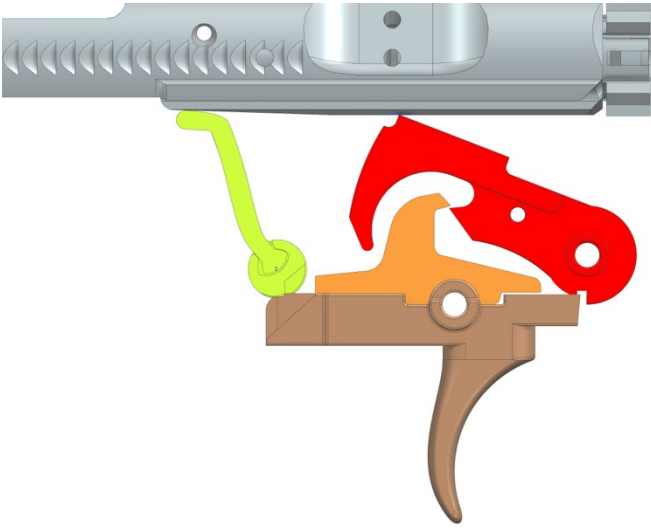
| '247 Patent, Claim 15                                                                                                                                                                                   | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                         |  <p data-bbox="812 871 1201 903"><b>Disconnecter Hook Engaged</b></p>                                                                                                                                                                                                                                                                                         |
| <p data-bbox="203 928 519 1102">and a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,</p>                                                                 | <p data-bbox="592 928 1388 1066">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. (<i>See image above depicting Super Safety, shown in yellow, in fire control mechanism pocket</i>)</p>  <p data-bbox="738 1449 1274 1480"><b>Super Safety Cam with Lobe and Lever</b></p> |
| <p data-bbox="203 1505 560 1753">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,</p> | <p data-bbox="592 1505 1331 1570">The cam is movable between a first position and a second position.</p>                                                                                                                                                                                                                                                                                                                                        |

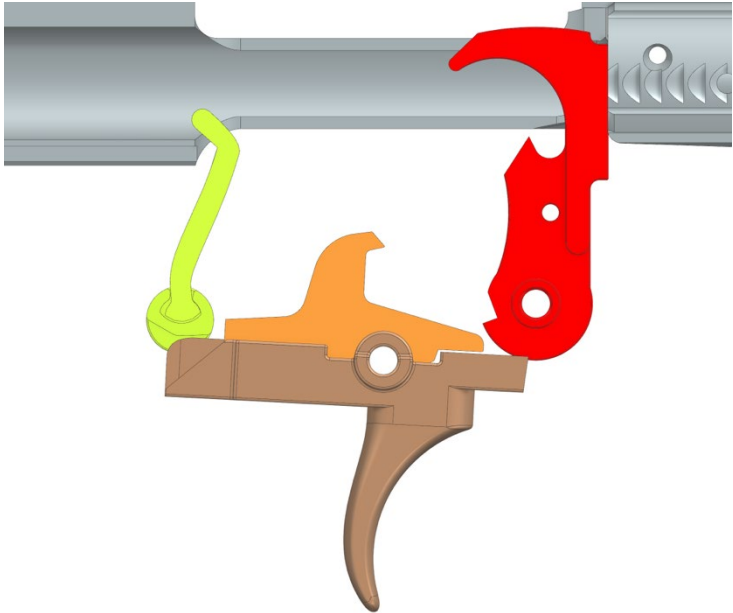
| '247 Patent, Claim 15                        | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                              |  <p data-bbox="808 741 1203 772"><b>Cam and Lobe First Position</b></p> <p data-bbox="592 793 1414 898">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.</p>  <p data-bbox="792 1518 1219 1549"><b>Cam and Lobe Second Position</b></p> |
| 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                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>said cam is in said first position,</p> <p>rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnecter hook catches said hammer hook,</p> |  <p>. . . the cam is in the first position.</p>  <p>Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.</p>  |

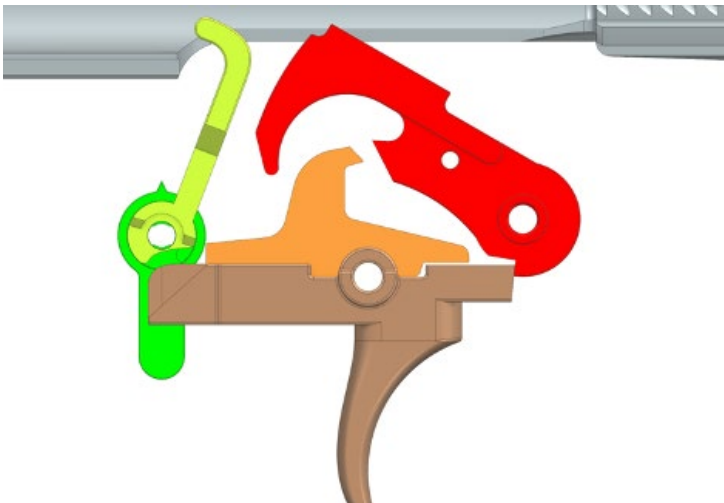
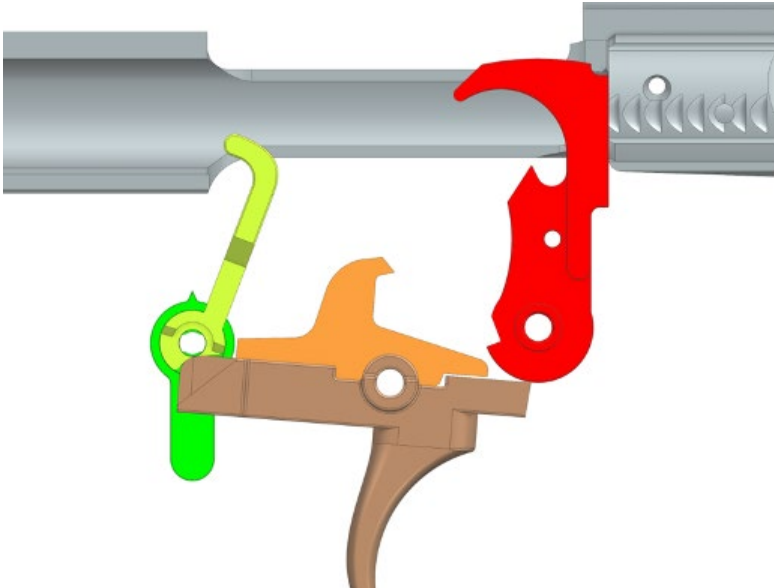
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>'247 Patent, Claim 15</b></p> <p>and thereafter the bolt carrier moves forward into battery,</p><br><br><br><br><br><br><br><br><br><br><p>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</p><br><br><br><br><br><br><br><br><br><br><p>whereupon in a forced reset semi-automatic mode,</p> | <p><b>The Super Safety</b></p> <p>Thereafter, the bolt carrier moves forward into battery,</p>  <p>. . . 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.</p>  <p>When in the “forced reset” semi-automatic mode,</p> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

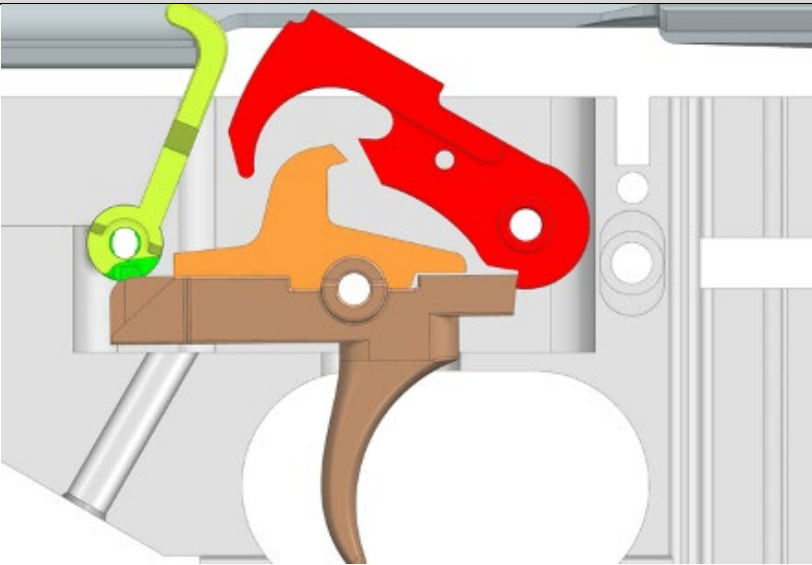
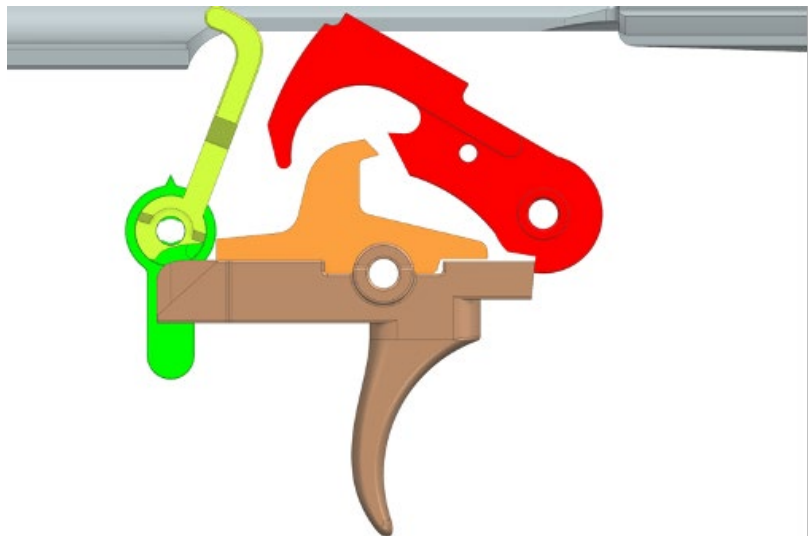
| '247 Patent, Claim 15                                                                                                                                                                                   | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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,</p> |  <p>. . . 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.</p>  |
| <p>and thereafter the bolt carrier moves forward into battery,</p>                                                                                                                                      | <p>Thereafter, the bolt carrier moves forward into battery,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                    |

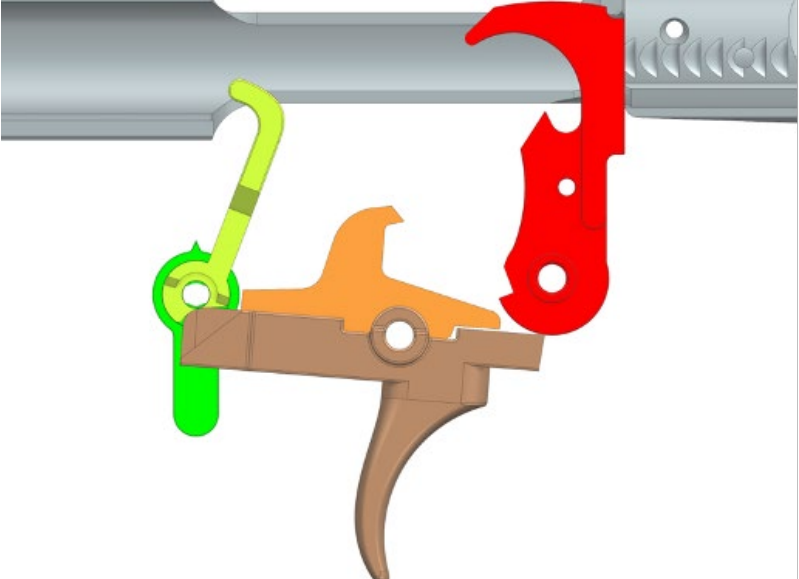
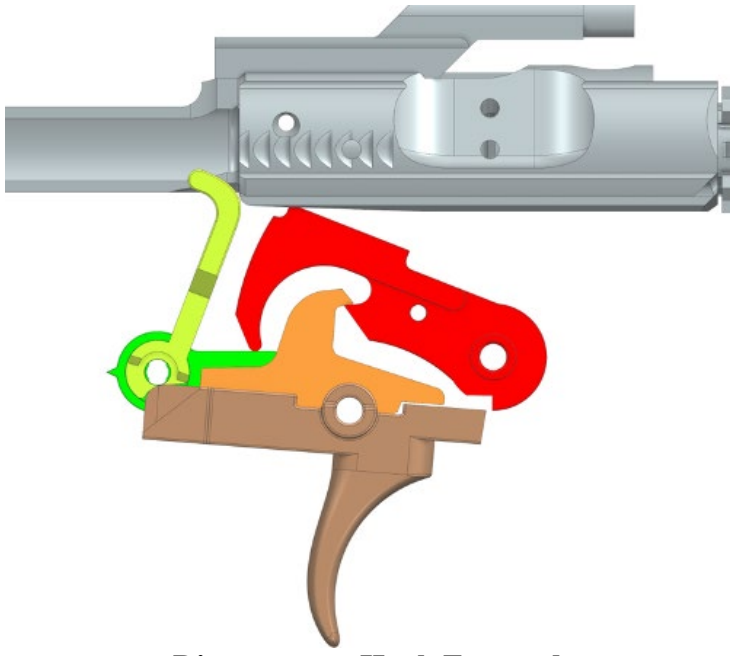
| '247 Patent, Claim 15                                                           | The Super Safety                                                                                                                                                                 |
|---------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                 |                                                                                                |
| <p>at which time the user can pull said trigger member to fire the firearm.</p> | <p>. . . at which time the user can pull the trigger member (brown) to fire the firearm.</p>  |

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

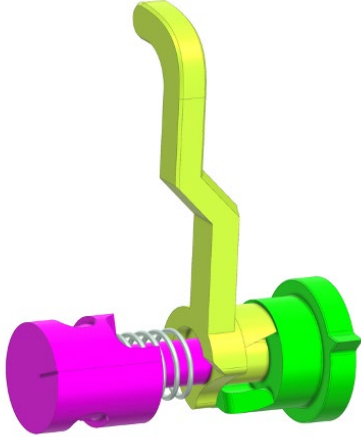
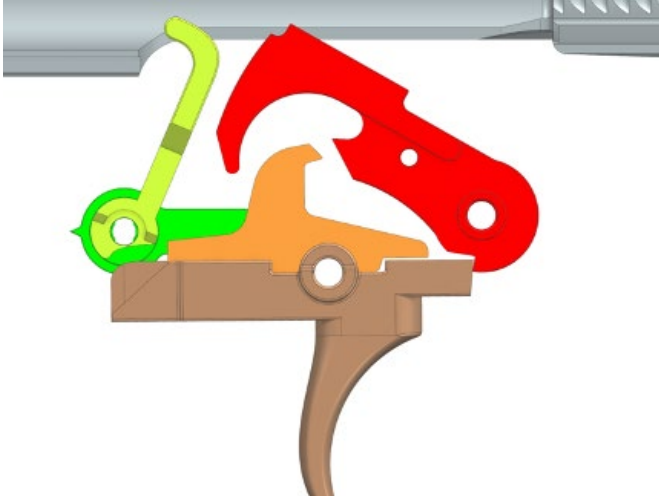
| '247 Patent Claim 15                                                                                                                                  | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>15. A firearm trigger mechanism comprising:</p>                                                                                                    | <p>When installed and used as directed, the Atrius Selector 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.</p> <div data-bbox="836 409 1177 787" data-label="Image"> </div> <p><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p> <p><b>Atrius Selector</b></p> |
| <p>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</p> | <p>The Atrius Selector (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 disconnector (orange).</p> <div data-bbox="609 1176 1404 1711" data-label="Image"> </div> <p>(Plaintiff-generated renderings of Atrius Selector here and below)</p>                                                                                                                                                                      |
| <p>to pivot on a transverse hammer pivot axis between</p>                                                                                             | <p>The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The</p>                                                                                                                                                                                                                                                                                                                                                                                         |

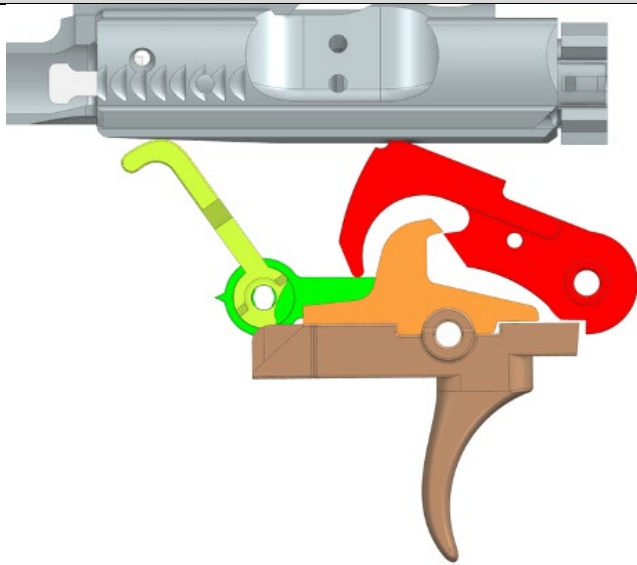
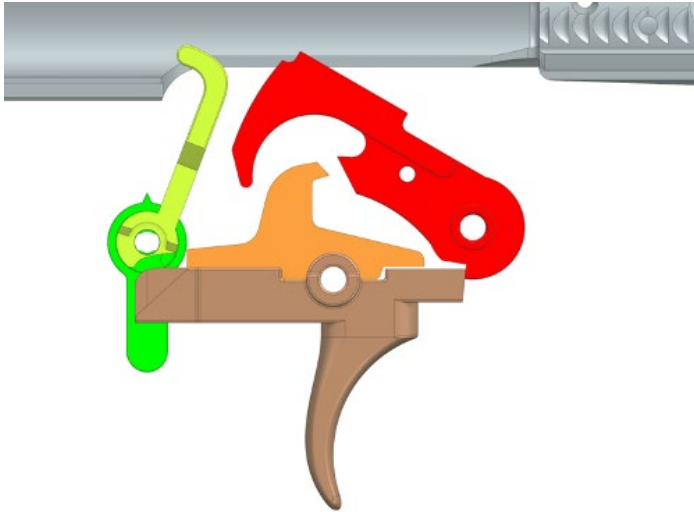
| '247 Patent Claim 15                                                                                                                                                                        | The Atrius Selector                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>set and released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,</p>                                                                       | <p>hammer is adapted to be pivoted rearward by rearward movement of a bolt carrier.</p>  <p><b>Hammer Set Position</b></p>  <p><b>Hammer Released Position</b></p> |
| <p>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,</p> | <p>The Atrius Selector (yellow) is installed with a trigger member (brown) in the fire control mechanism pocket that pivots on a transverse trigger member pivot axis between set and released positions and has a sear. The trigger member (brown) has a sear.</p>                                                                     |

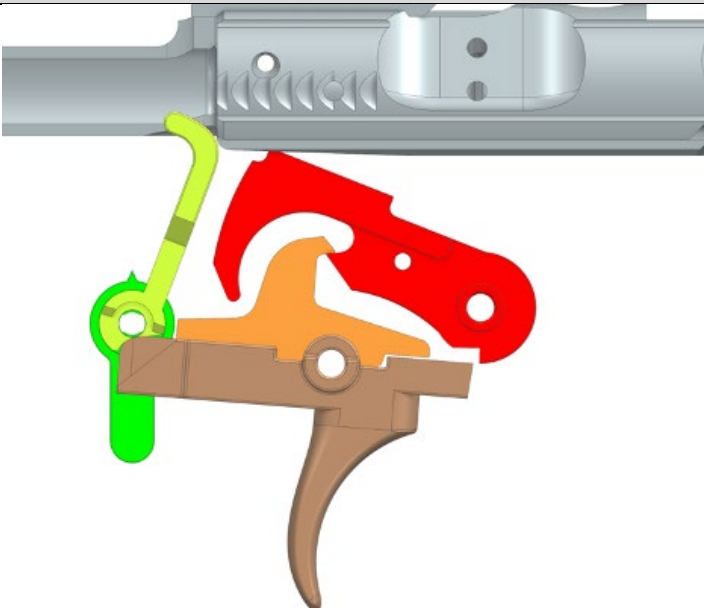
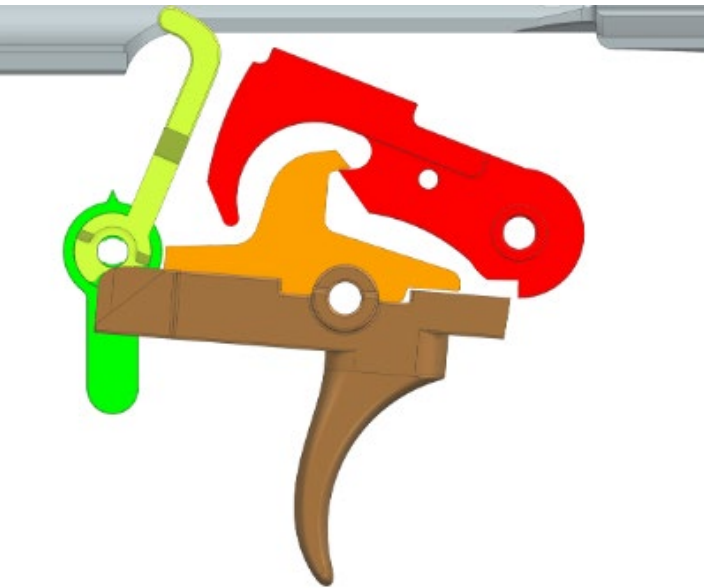
| '247 Patent Claim 15                                                                                              | The Atrius Selector                                                                                                                                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                   |                                                                                                                                                                                                                                           |
| <p>wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member</p> | <p>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.</p>  <p style="text-align: center;"><b>Trigger Member Set Position</b></p> |
| <p>and are out of engagement in said released positions of said hammer and trigger member,</p>                    | <p>The sear of the trigger member (brown) and sear catch of the hammer (red) are out of engagement in the released position.</p>                                                                                                                                                                                            |

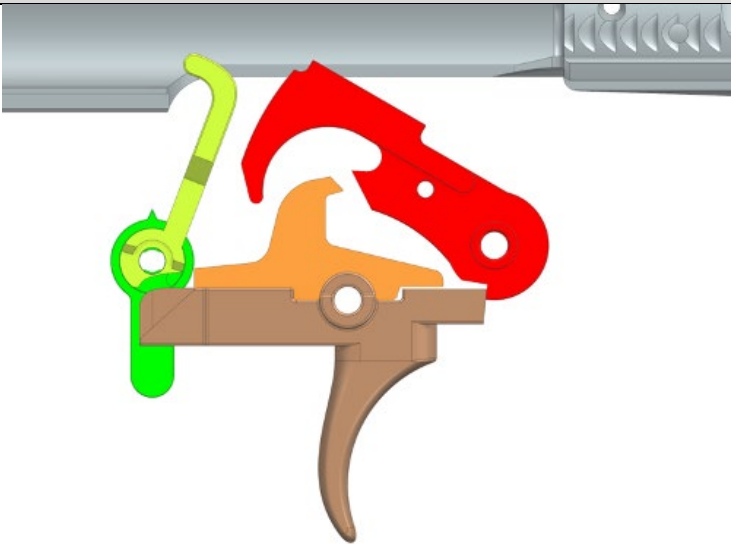
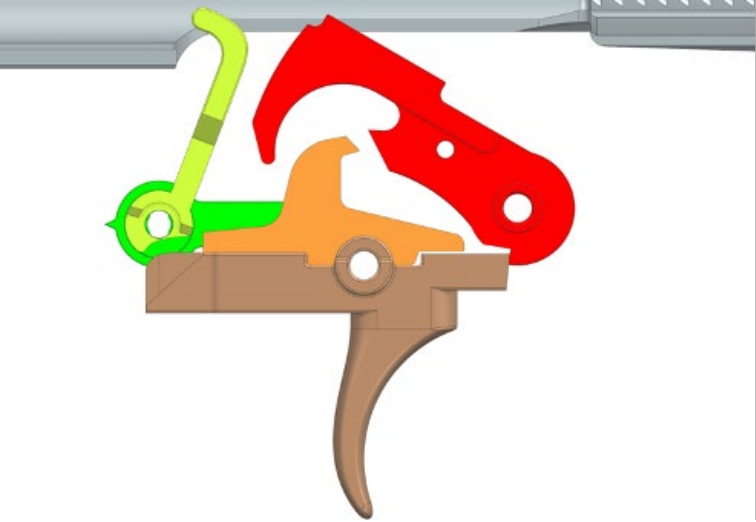
| '247 Patent Claim 15                                                                                                                                                             | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                  |  <p>The diagram shows a side view of a trigger assembly. A brown trigger is at the bottom. Above it is an orange disconnecter with a hook on its left side. A red hammer is positioned above the orange disconnecter, with its hook engaged with the orange disconnecter's hook. A yellow lever is on the left, connected to the orange disconnecter. The entire assembly is mounted on a grey base.</p> <p><b>Trigger Member Released Position</b></p>                                                                                                               |
| <p>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,</p> | <p>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).</p>  <p>The diagram shows a side view of the trigger assembly in a different state. The orange disconnecter is now pivoted upwards, and its hook is engaged with the red hammer's hook. The brown trigger remains at the bottom. The yellow lever is still on the left. The assembly is mounted on a grey base.</p> <p><b>Disconnecter Hook Engaged</b></p> |
| <p>and a cam having a cam lobe and adapted to be movably mounted in the</p>                                                                                                      | <p>The Atrius Selector has a cam and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting Atrius Selector, shown in yellow, in fire control mechanism pocket)</p>                                                                                                                                                                                                                                                                                                                                                                                                                               |

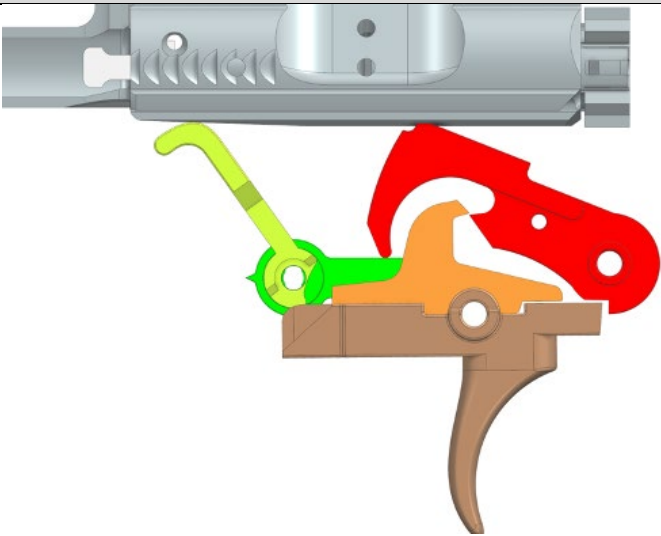
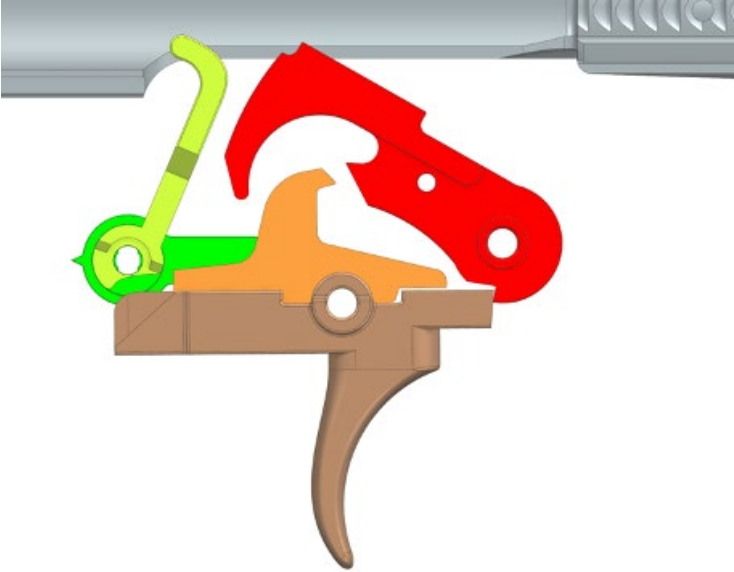


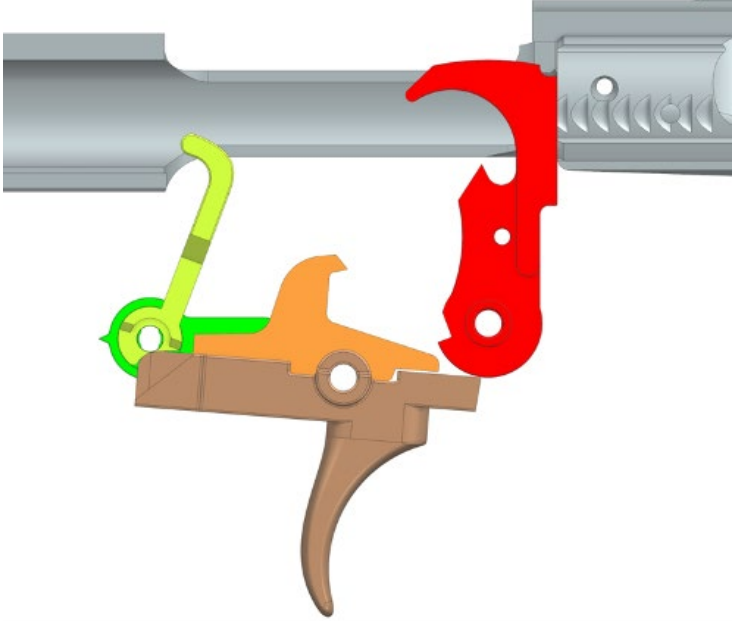
| '247 Patent Claim 15                                                                                                                                               | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| fire control mechanism pocket,                                                                                                                                     |  <p data-bbox="721 726 1289 758" style="text-align: center;"><b>Atrius Selector Cam with Lobe and Lever</b></p>                                                                                                                                                                                                                                                                                                           |
| 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, | <p data-bbox="591 783 1333 852">The cam is movable between a first position and a second position.</p>  <p data-bbox="808 1398 1203 1430" style="text-align: center;"><b>Cam and Lobe First Position</b></p> <p data-bbox="591 1451 1414 1556">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.</p> |

| '247 Patent Claim 15                                                                                                                            | The Atrius Selector                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                 |  <p data-bbox="792 814 1218 846"><b>Cam and Lobe Second Position</b></p>                                          |
| <p>whereupon in a standard semi-automatic mode, said cam is in said first position,</p>                                                         | <p>During at least part of the cycle in the standard semi-automatic mode, the cam is in the first position.</p>  |
| <p>rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnector hook catches said hammer hook,</p> | <p>Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnector (orange) hook catches the hammer hook.</p>                                         |

| '247 Patent Claim 15                                                                                                                                                                                                            | The Atrius Selector                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                 |                                                                                                                                                                                                 |
| <p>and thereafter the bolt carrier moves forward into battery,</p>                                                                                                                                                              | <p>Thereafter, the bolt carrier moves forward into battery,</p>                                                                                                                                |
| <p>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</p> | <p>. . . at this 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</p> |

| '247 Patent Claim 15                                                                                                                                                                             | The Atrius Selector                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| member to fire the firearm, and                                                                                                                                                                  |                                                                                                                                                                                                                                                                    |
| whereupon in a forced reset semi-automatic mode,                                                                                                                                                 | <p data-bbox="597 846 1227 877">When in the “forced reset” semi-automatic mode,</p>                                                                                                                                                                               |
| said cam is in said second position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnector hook is prevented from catching said hammer hook, | <p data-bbox="597 1444 1382 1661">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 disconnector (orange) hook is prevented from catching the hammer hook.</p> |

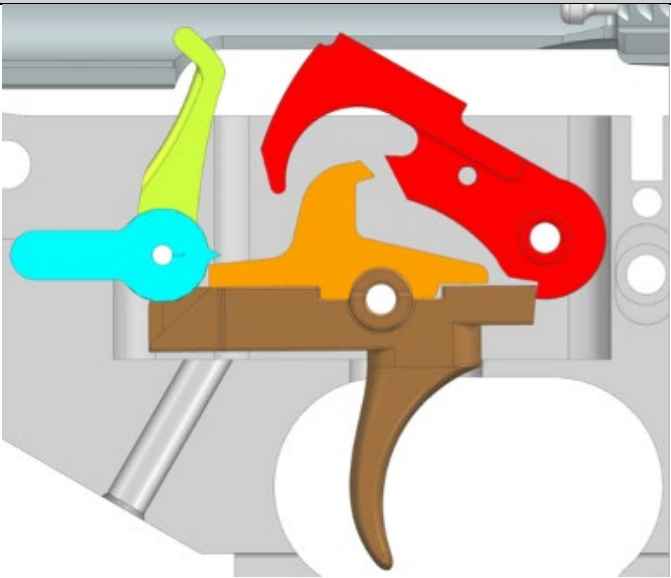
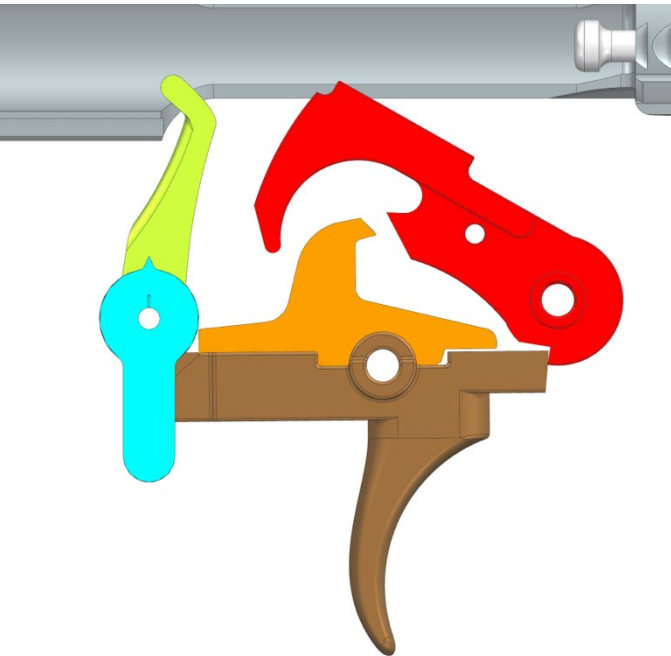
| '247 Patent Claim 15                                                     | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                          |  A cross-sectional diagram of a firearm's trigger assembly. A grey bolt carrier is positioned at the top, with its firing pin extended downwards. Below the bolt carrier, a green hook-shaped component is connected to a red selector lever. The selector lever is currently in a retracted position, pointing upwards and to the left. An orange trigger member is positioned below the selector lever, and a brown trigger is at the bottom. The entire assembly is mounted on a brown base. |
| and thereafter the bolt carrier moves forward into battery,              | Thereafter, the bolt carrier moves forward into battery,<br> A cross-sectional diagram of the same trigger assembly. The grey bolt carrier has moved forward, now in a position where its firing pin is aligned with the trigger assembly. The green hook-shaped component and red selector lever remain in the same retracted position as in the previous diagram. The orange trigger member and brown trigger are also in the same position.                                                 |
| at which time the user can pull said trigger member to fire the firearm. | . . . at which time the user can pull said trigger member (brown) to fire the firearm.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| '247 Patent Claim 15 | The Atrius Selector                                                                |
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|                      |  |

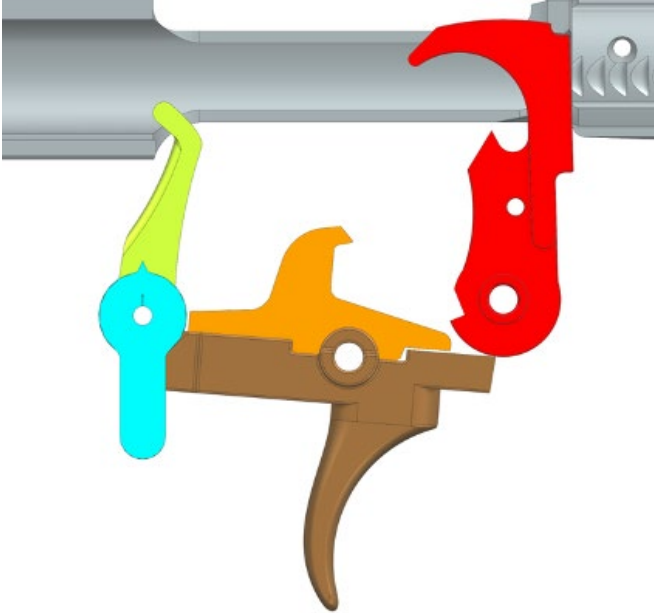
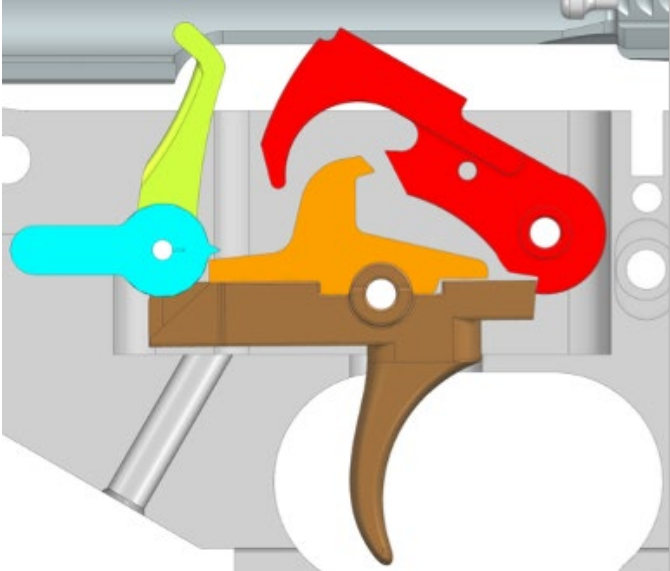
65. An exemplary comparison of the ARC-Fire, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

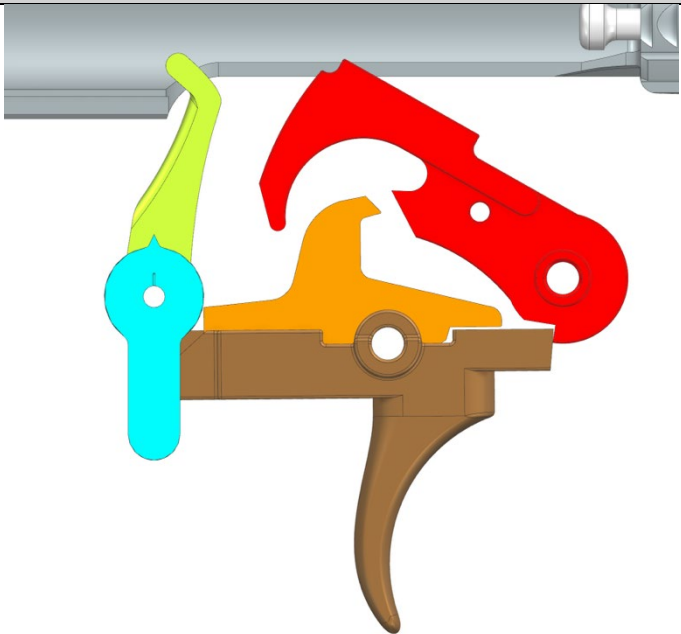
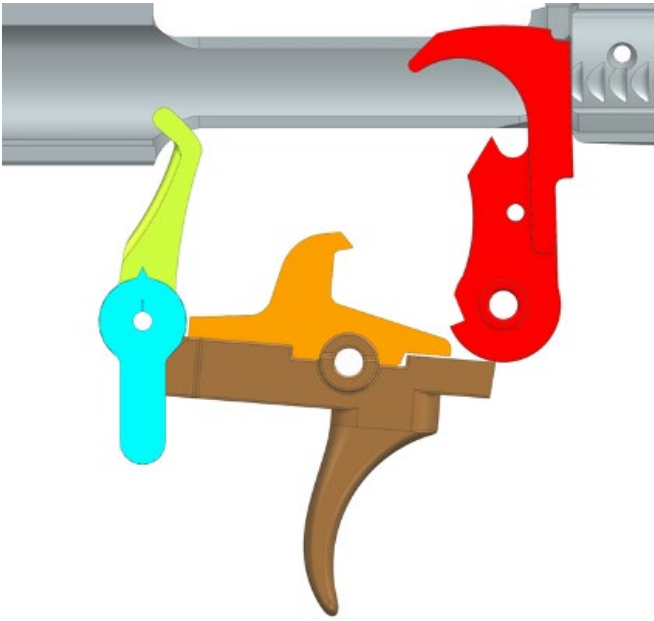
| '247 Patent Claim 15                        | The ARC-Fire                                                                                                                                                                                                                 |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 15. A firearm trigger mechanism comprising: | When installed and used as directed, the ARC-Fire 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. |

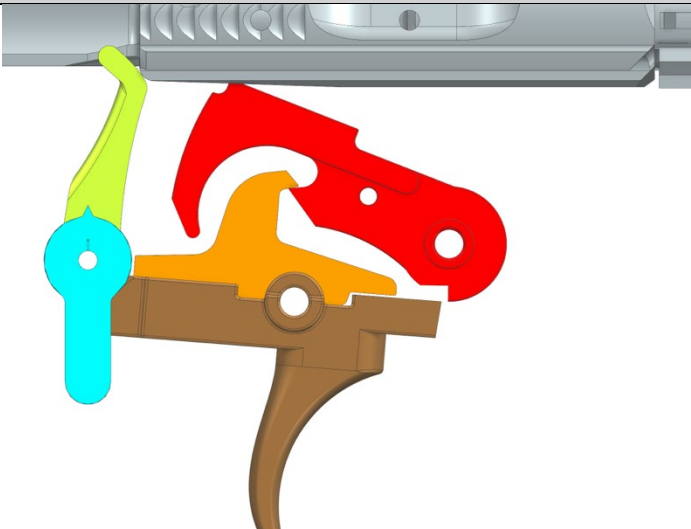
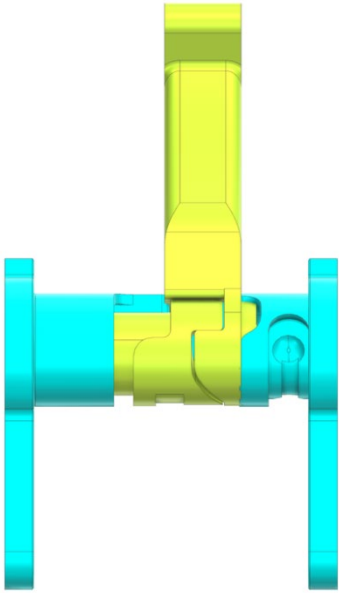
| '247 Patent Claim 15                                                                                                                                  | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                       |  <p data-bbox="621 888 1390 961"><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p>  <p data-bbox="938 1549 1073 1581"><b>ARC-Fire</b></p> |
| <p>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</p> | <p>The ARC-Fire (yellow/blue) 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).</p>                                                                                                                                                                                                                                     |

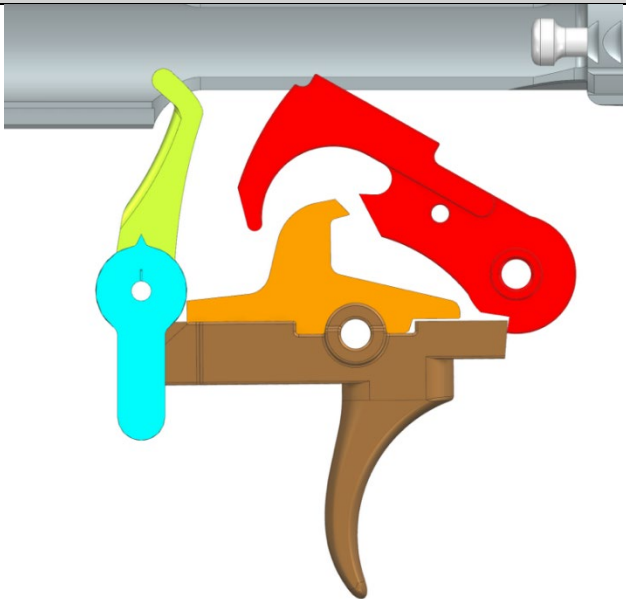
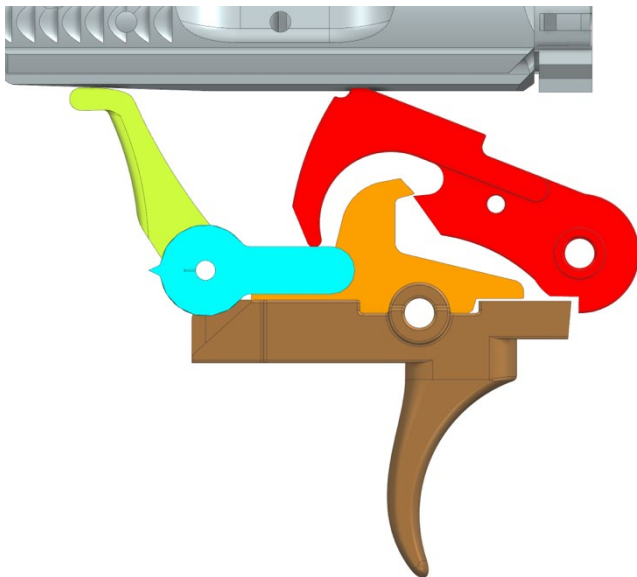
| '247 Patent Claim 15                                                                                                                                                     | The ARC-Fire                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                          |  <p>(Plaintiff-generated renderings of ARC-Fire here and below)</p>                                                                                                                                                                            |
| <p>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,</p> | <p>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.</p>  <p><b>Hammer Set Position</b></p> |



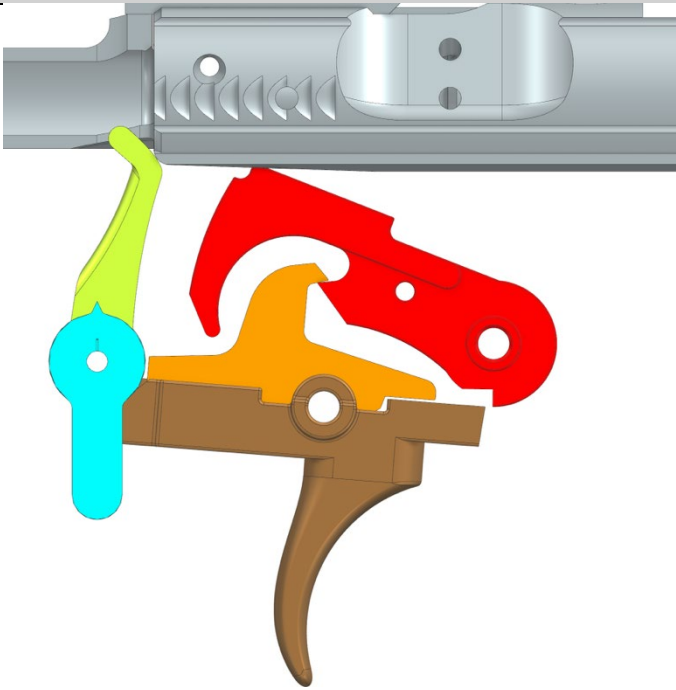
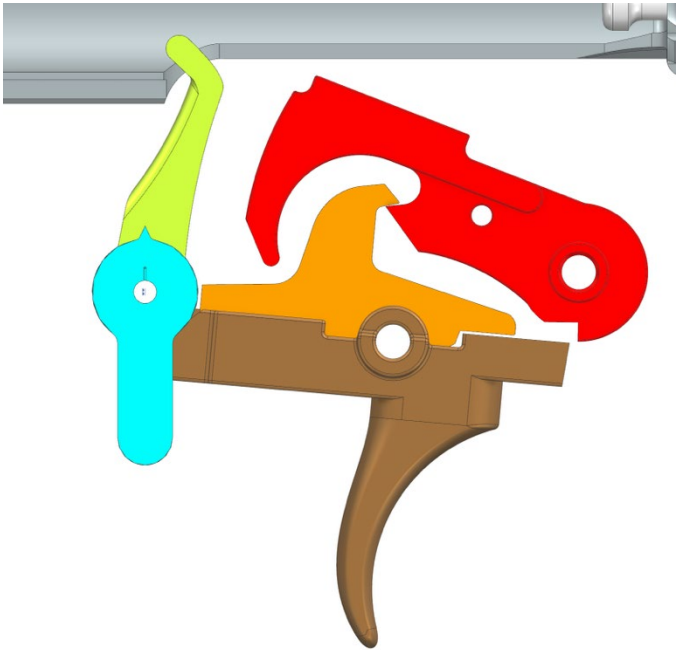
| '247 Patent Claim 15                                                                                                                                                                        | The ARC-Fire                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                             |  <p data-bbox="821 884 1187 915"><b>Hammer Released Position</b></p>                                                                                                                                                                                                    |
| <p>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,</p> | <p>The ARC-Fire (yellow/blue) 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.</p>  |
| <p>wherein said sear and sear catch are in engagement in said set positions of said</p>                                                                                                     | <p>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.</p>                                                                                                                                                                                         |

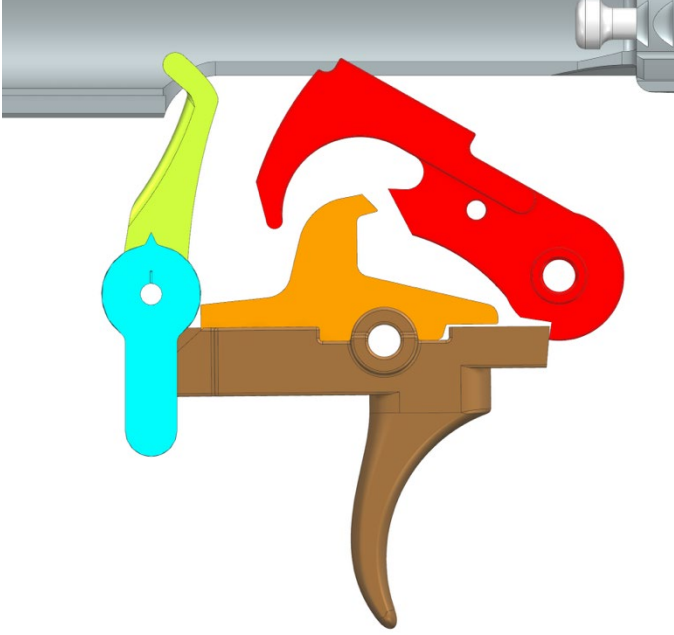
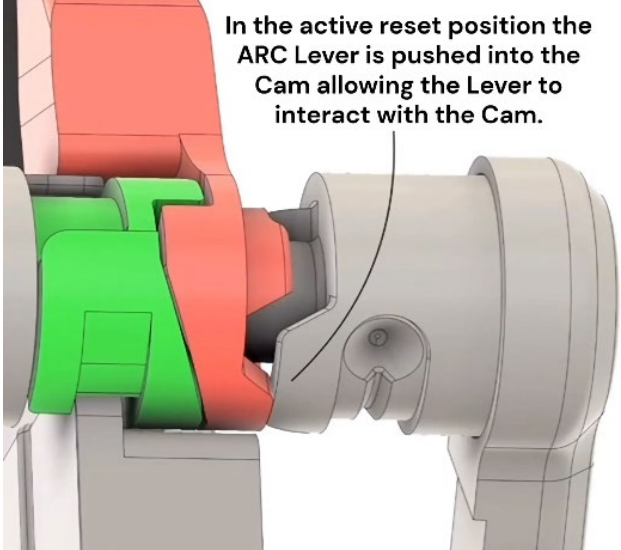
| '247 Patent Claim 15                                                                                   | The ARC-Fire                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| hammer and trigger member                                                                              |  <p style="text-align: center;"><b>Trigger Member Set Position</b></p>                                                                                                                                         |
| and are out of engagement in said released positions of said hammer and trigger member,                | <p>The sear of the trigger member (brown) and sear catch of the hammer (red) are out of engagement in the released position.</p>  <p style="text-align: center;"><b>Trigger Member Released Position</b></p> |
| said disconnecter having a hook for engaging said hammer and adapted to be mounted in the fire control | <p>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).</p>                                                                                      |

| '247 Patent Claim 15                                                                                                                    | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>mechanism pocket to pivot on a transverse disconnecter pivot axis,</p>                                                               |  <p>The diagram shows a cross-sectional view of a firearm's trigger assembly. A brown trigger is at the bottom. Above it is a yellow lever with a blue cam lobe. A red hook-shaped component is shown engaging with the yellow lever. A blue hook-shaped component is also visible, attached to the yellow lever. The entire assembly is mounted on a transverse pivot axis.</p> <p><b>Disconnecter Hook Engaged</b></p>                                                                    |
| <p>and a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,</p>                              | <p>The ARC-Fire (yellow/blue) has a lever (yellow) with a cam lobe that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting ARC-Fire, shown in (yellow/blue), in fire control mechanism pocket)</p>  <p>The diagram shows a yellow lever with a blue cam lobe. The lever is mounted on a blue base. The cam lobe is positioned to engage with a blue component of the fire control mechanism.</p> <p><b>ARC-Fire Lever with Cam Lobe</b></p> |
| <p>said cam being movable between a first position and a second position, in said second position said cam lobe forces said trigger</p> | <p>The cam is movable between a first position and a second position.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| '247 Patent Claim 15                         | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| member towards said set position,            | <div data-bbox="695 226 1317 821"></div> <p data-bbox="808 848 1203 884"><b>Cam and Lobe First Position</b></p> <p data-bbox="592 953 1414 1058">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.</p> <div data-bbox="667 1073 1300 1646"></div> <p data-bbox="792 1673 1219 1709"><b>Cam and Lobe Second Position</b></p> |
| whereupon in a standard semi-automatic mode, | During at least part of the cycle in the standard semi-automatic mode,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

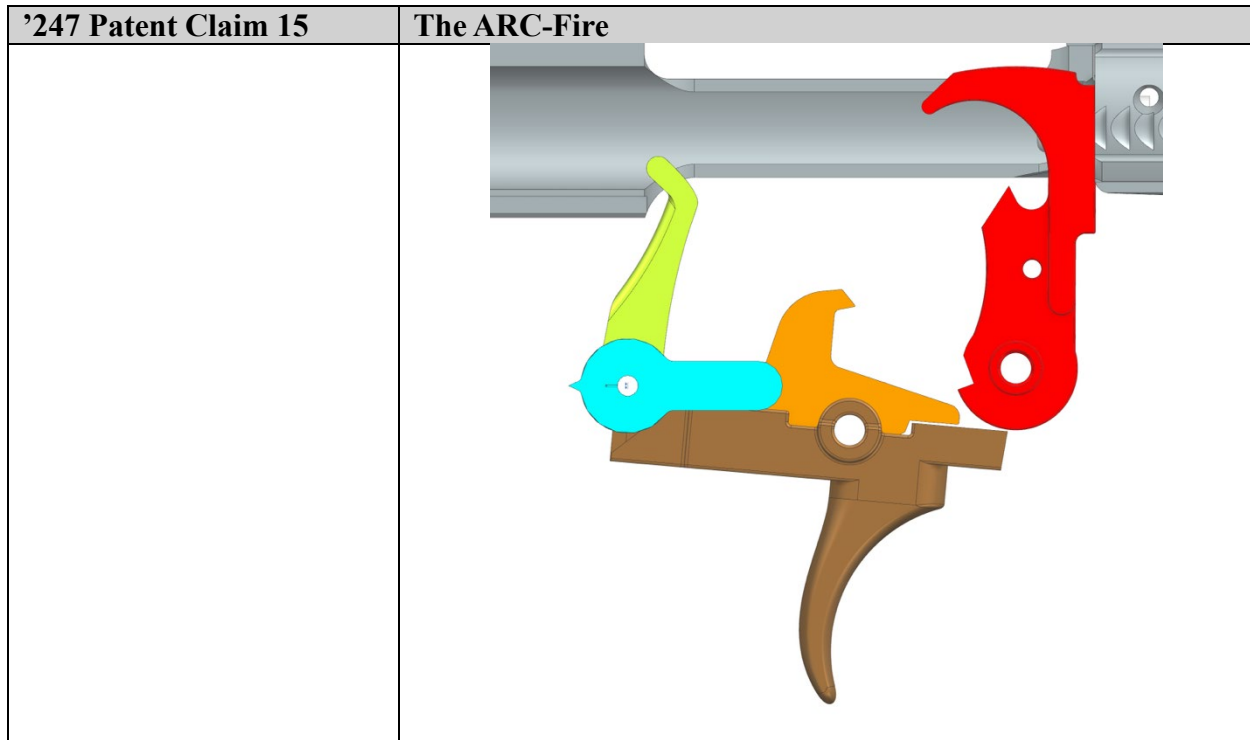


| '247 Patent Claim 15                                                                                                                                                                                                  | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>and thereafter the bolt carrier moves forward into battery,</p> <p>at which time a user must manually release said trigger member to free said hammer from said disconnector to permit said hammer and trigger</p> |  <p>Thereafter, the bolt carrier moves forward into battery,</p>  <p>At this 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.</p> |

| '247 Patent Claim 15                                                                                                                                                                                          | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>member to pivot to said set positions so that the user can pull said trigger member to fire the firearm, and</p>                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>whereupon in a forced reset semi-automatic mode,</p> <p>said cam is in said second position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnector</p> | <p>When in the “forced reset” semi-automatic mode,</p>  <p>... 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 disconnector (orange) hook is prevented from catching the hammer hook.</p> |







66. 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, Atrius Selector, and ARC-Fire.

67. 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.

68. 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, Atrius Selector, and ARC-Fire, 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.

69. 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.

70. 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.

71. 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.

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

73. 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.

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

75. 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**

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

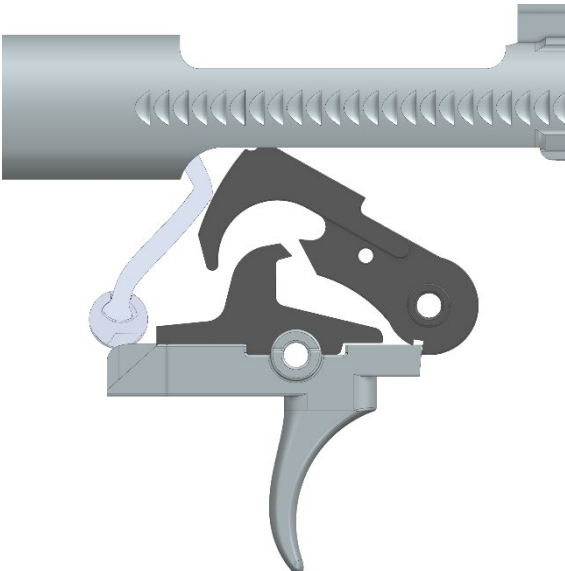
77. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, 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, Atrius Selector, and ARC-Fire.

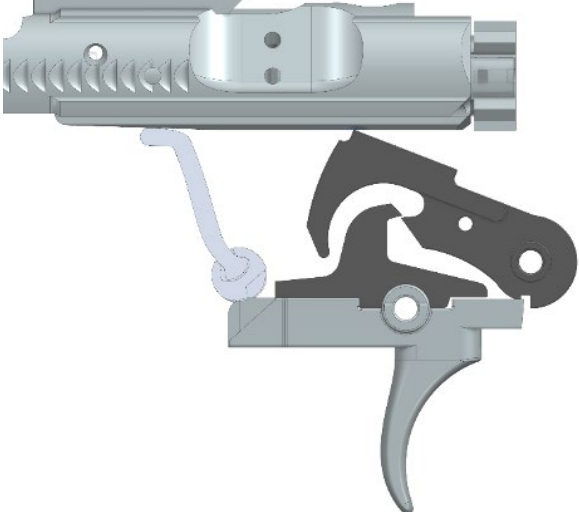
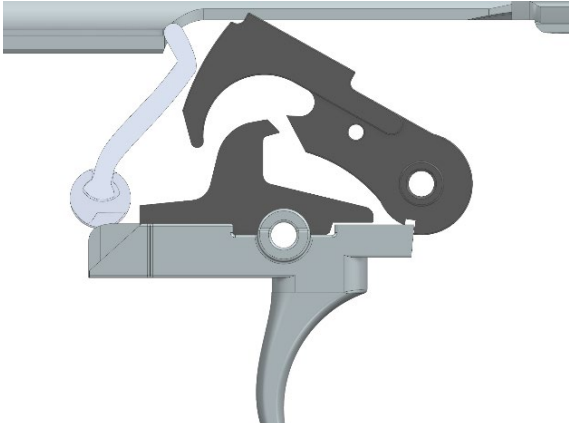
78. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

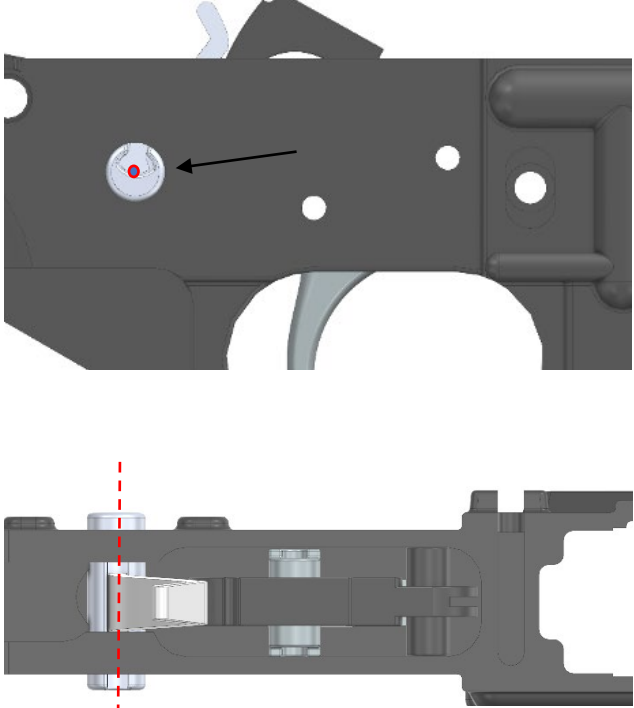
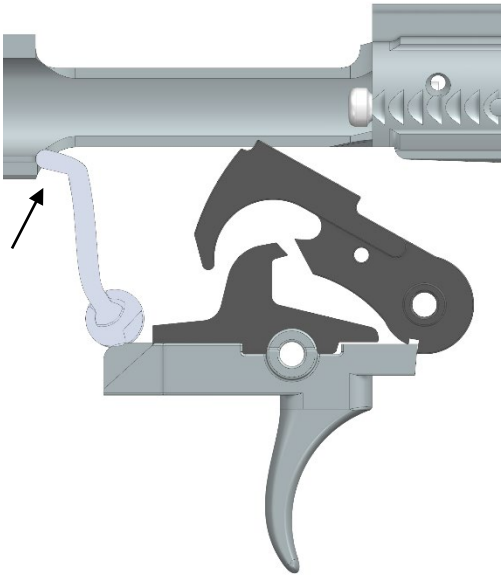
79. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

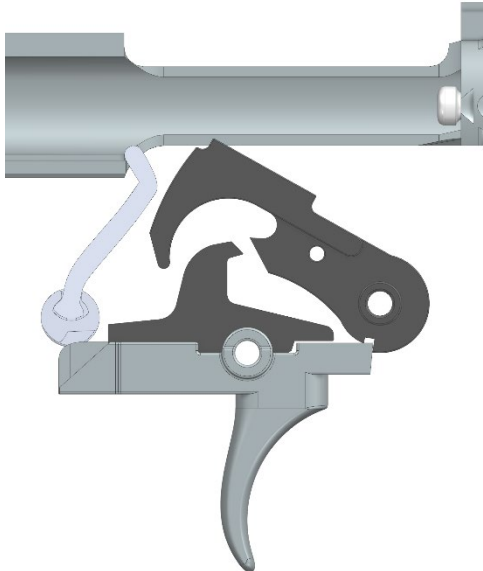
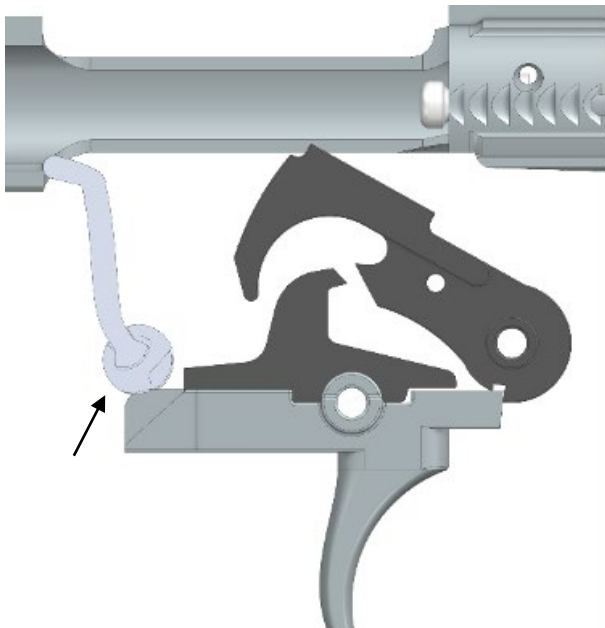
| <b>'784 Patent, Claim 1</b>                                                                    | <b>Infringing Device (Super Safety)</b>                                                                                                                       |
|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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. |

| '784 Patent, Claim 1 | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <div data-bbox="857 260 1308 995"></div> <div data-bbox="805 1031 1364 1104"><p><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p></div> <div data-bbox="846 1117 1320 1589"></div> <div data-bbox="735 1593 1432 1734"><p><b>Super Safety</b><br/>Ex. J, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12</p></div> |

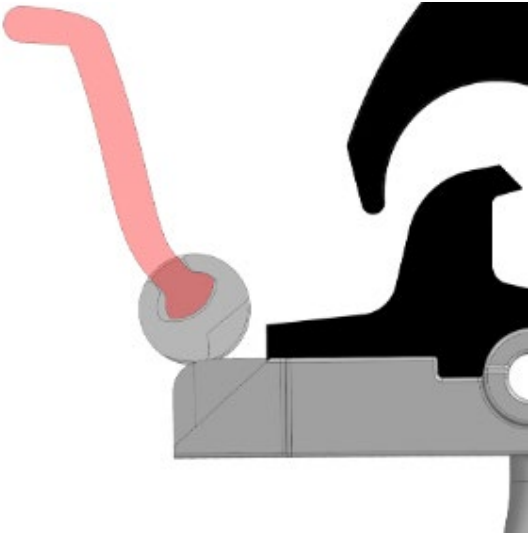
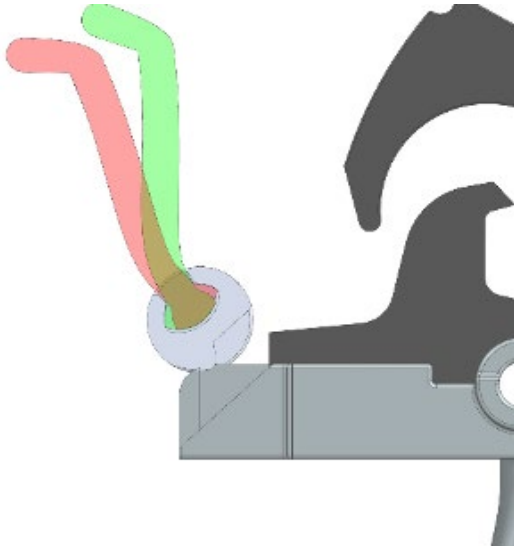
| '784 Patent, Claim 1                                                                                                  | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                       |  <p style="text-align: center;"><b>Super Safety Installed</b><br/>         (Plaintiff-generated renderings of Super Safety here and below; Locking member and bolt carrier shown here and below in section view for clarity)</p> <p>“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.”<br/>         Ex. J, Super Safety Guide at 1.</p> |
| <p>a locking member that is movable between a first position in which it locks a trigger against pulling movement</p> | <p>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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

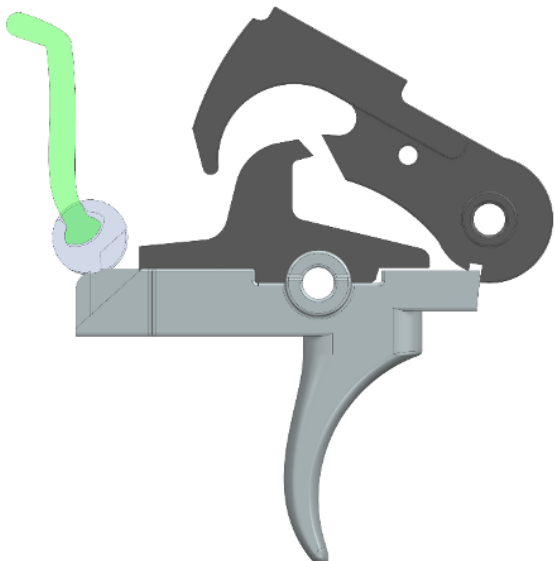
| '784 Patent, Claim 1                                                                                                | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                     |  <p data-bbox="938 758 1230 789"><b>Locked First Position</b></p>                                                                                                                                                                                |
| <p data-bbox="203 835 711 940">and a second position where it does not restrict movement of the trigger member,</p> | <p data-bbox="732 835 1425 940">The Super Safety is moveable from the first position to a second position where it does not restrict movement of the trigger member.</p>  <p data-bbox="906 1409 1260 1440"><b>Unlocked Second Position</b></p> |
| <p data-bbox="203 1480 678 1549">the locking member configured to be movably supported by a frame</p>               | <p data-bbox="732 1480 1425 1585">The Super Safety is movably (pivotal) about the axis depicted below) supported by a frame (the lower receiver).</p>                                                                                                                                                                              |

| '784 Patent, Claim 1                                                                                                               | Infringing Device (Super Safety)                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                    |                                                                                                                                                 |
| <p>and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,</p> | <p>The Super Safety has an upward extending portion (lever arm) configured to make actuating contact with a surface of the bolt carrier.</p>  |
| <p>such actuating contact causing the locking member to move from the first position to the second position,</p>                   | <p>The actuating contact causes the locking member to move from the first position to the second position.</p>                                                                                                                    |

| '784 Patent, Claim 1                                                                                                               | Infringing Device (Super Safety)                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                    |  <p data-bbox="906 852 1256 884"><b>Unlocked Second Position</b></p>                                                                                                                                         |
| the locking member having a body portion that is movably supported                                                                 | <p data-bbox="735 930 1409 999">The Super Safety has a body portion that is movably supported by the lower receiver.</p>                                                                                   |
| and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position | <p data-bbox="735 1703 1430 1875">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</p> |

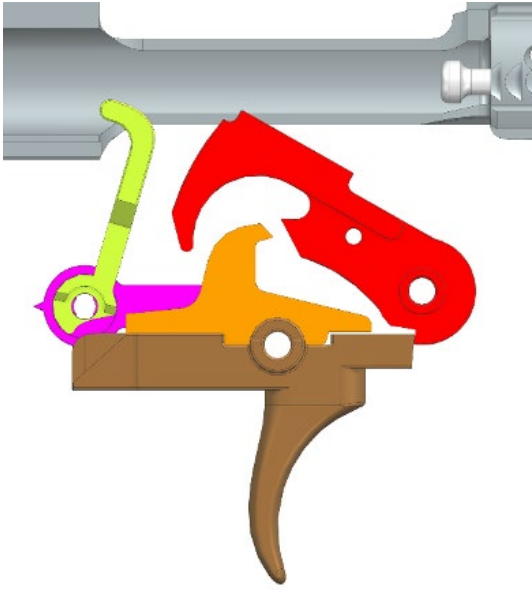


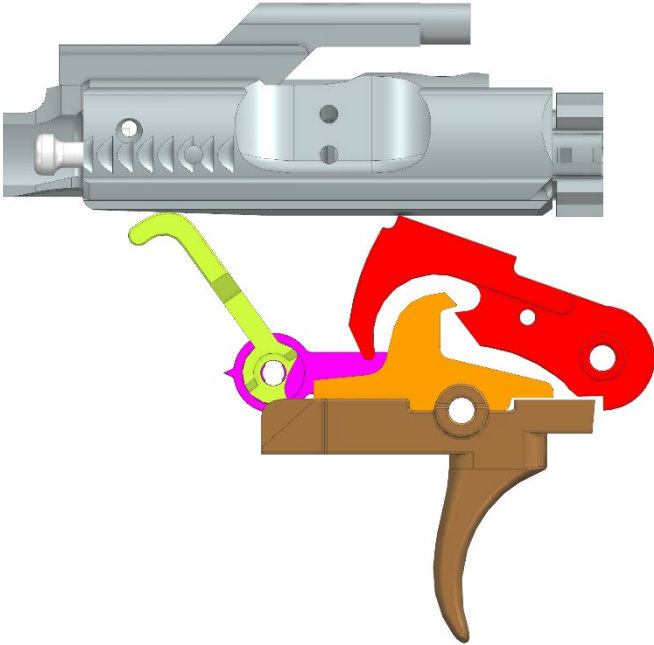
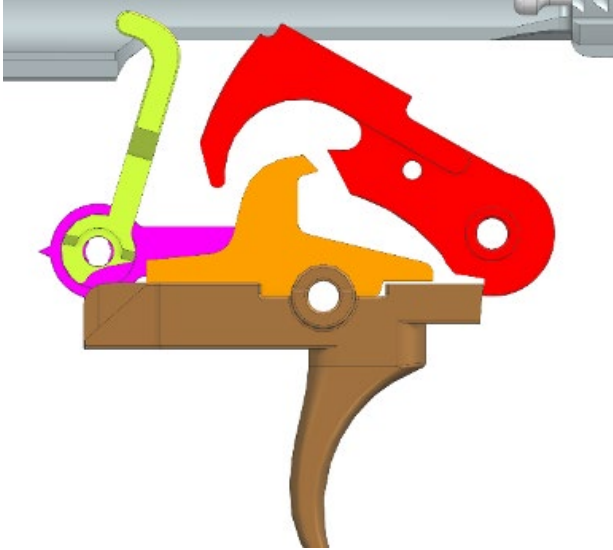
| '784 Patent, Claim 1 | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <p data-bbox="732 233 1430 306">another position where it is deflected (depicted in green).</p>  <p data-bbox="732 940 1430 1087">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.</p>  <p data-bbox="732 1665 1430 1877">“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</p> |

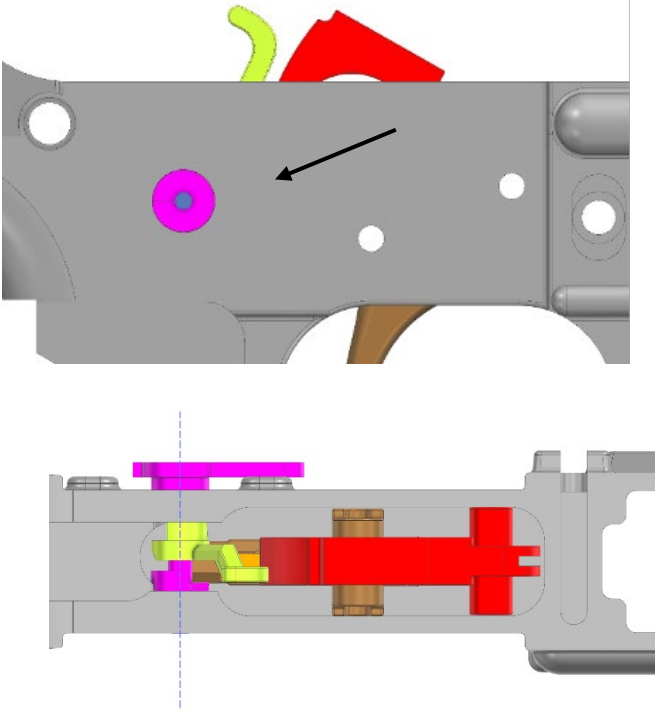
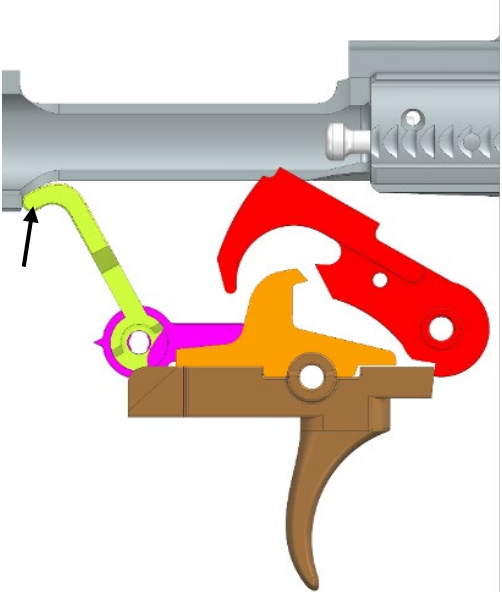
| '784 Patent, Claim 1      | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | <p>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 removed for clarity). Ex. J, Super Safety Guide at 4. <a href="https://www.scribd.com/document/843484122/Super-Safety-Documentation">https://www.scribd.com/document/843484122/Super-Safety-Documentation</a></p> |
| and a deflected position. | <p>The lever is now shown deflected independent of the body.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

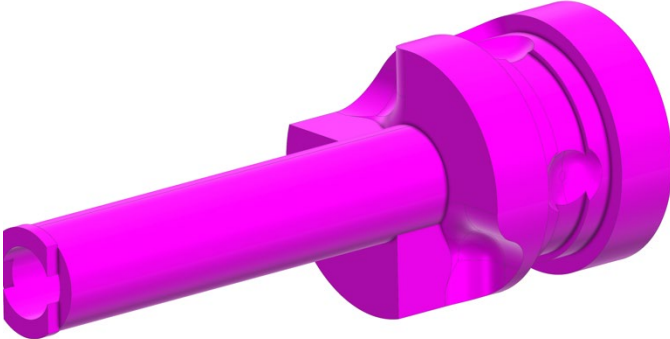
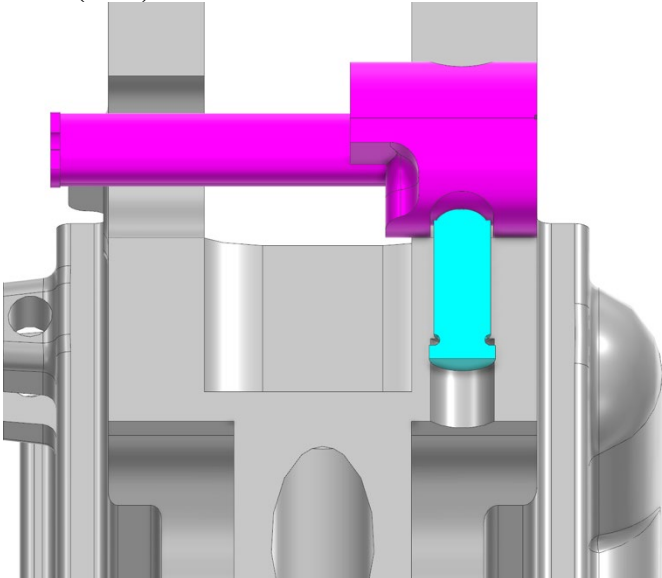
80. An exemplary comparison of the Atrius Selector, when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

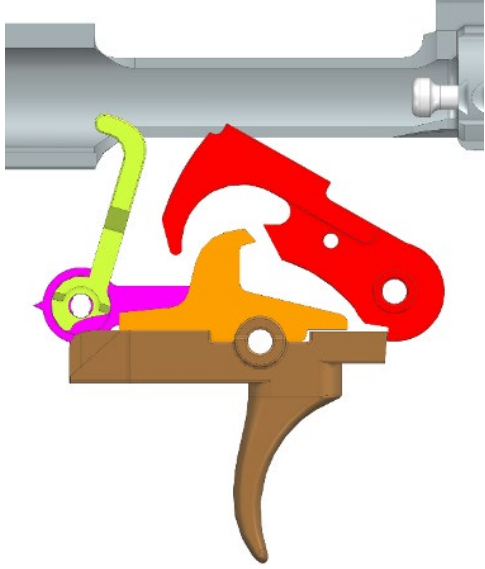
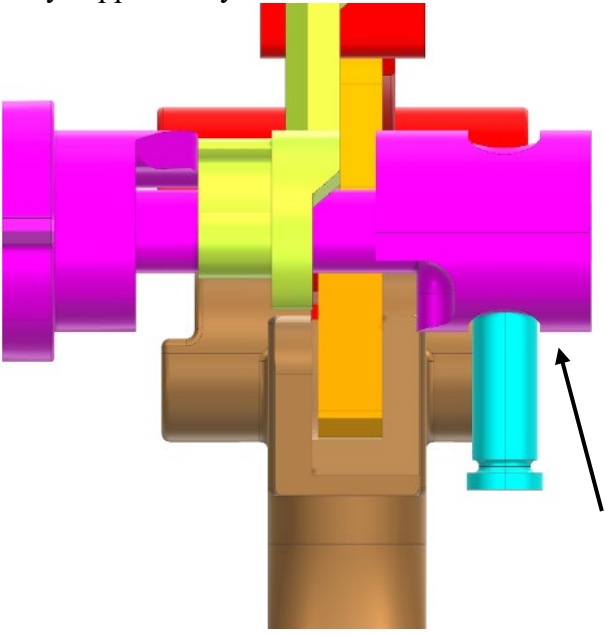
| '784 Patent, Claim 1                                                                           | The Atrius Selector                                                                                                                                                |
|------------------------------------------------------------------------------------------------|--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

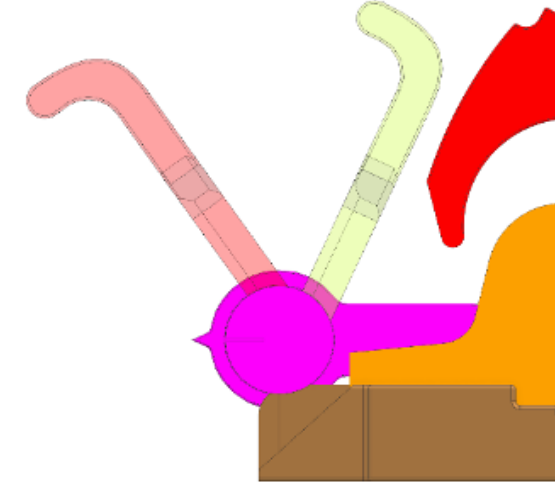
| '784 Patent, Claim 1                                                                                           | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                |  <p data-bbox="803 659 1364 730"><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p> <p data-bbox="980 747 1187 779"><b>Atrius Selector</b></p>  <p data-bbox="915 1438 1252 1470"><b>Atrius Selector Installed</b><br/>(Plaintiff-generated renderings of Atrius Selector here and below; Locking member and bolt carrier shown here and below in section view for clarity)</p> |
| a locking member that is movable between a first position in which it locks a trigger against pulling movement | The Atrius Selector operates as a locking member and has a first position in which it locks the trigger member against pulling movement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| '784 Patent, Claim 1                                                                                                 | The Atrius Selector                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                      |  <p data-bbox="938 888 1230 919"><b>Locked First Position</b></p>                                                                                                                                                                                     |
| <p data-bbox="203 968 711 1066">and a second position where it does not restrict movement of the trigger member,</p> | <p data-bbox="732 968 1430 1066">The Atrius Selector is moveable from the first position to a second position where it does not restrict movement of the trigger member.</p>  <p data-bbox="906 1661 1263 1692"><b>Unlocked Second Position</b></p> |
| <p data-bbox="203 1730 678 1801">the locking member configured to be movably supported by a frame</p>                | <p data-bbox="732 1730 1419 1835">The Atrius Selector is movably (pivotally about the axis depicted below) supported by a frame (the lower receiver).</p>                                                                                                                                                                               |

| '784 Patent, Claim 1                                                                                                               | The Atrius Selector                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                    |                                                                                                                                                           |
| <p>and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,</p> | <p>The Atrius Selector has an upward extending portion (yellow lever arm) configured to make actuating contact with a surface of the bolt carrier.</p>  |

| '784 Patent, Claim 1                                                                                      | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                           |  <p data-bbox="735 636 1409 814">The body portion (purple) has a track with holes that are lined up to correspond to the selectable modes (Fire/ Standard Semi-Automatic, "Forced Reset" Semi-Automatic) which are positively stopped by a detent (blue)</p>  <p data-bbox="771 1392 1393 1465"><b>Section View of Body Portion (purple), Lower Receiver (grey), and Detent (blue)</b></p> <p data-bbox="735 1503 1406 1608">Once installed, the body portion (purple) is movably supported by the lower receiver (grey) using the detent (blue).</p> |
| such actuating contact causing the locking member to move from the first position to the second position, | The actuation causes the locking member to move from the first position to the second position.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| '784 Patent, Claim 1                                                                                                                                                    | The Atrius Selector                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                         |  <p data-bbox="906 850 1258 892"><b>Unlocked Second Position</b></p>                                                                                                                                                                                                |
| <p data-bbox="203 934 649 997">the locking member having a body portion that is movably supported</p>                                                                   | <p data-bbox="732 934 1425 997">The Atrius Selector has a body portion (purple) that is movably supported by the lower receiver.</p>                                                                                                                               |
| <p data-bbox="203 1663 706 1806">and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position</p> | <p data-bbox="732 1663 1425 1869">The Atrius Selector has an upwardly extending deflectable portion (lever arm). The 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 another position where it is deflected (depicted in yellow).</p> |

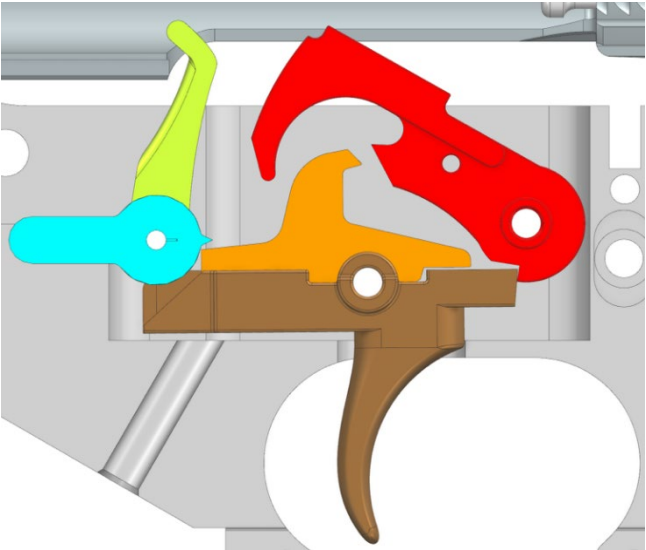
| '784 Patent, Claim 1 | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |  <p data-bbox="730 861 1429 1018">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.</p>  |

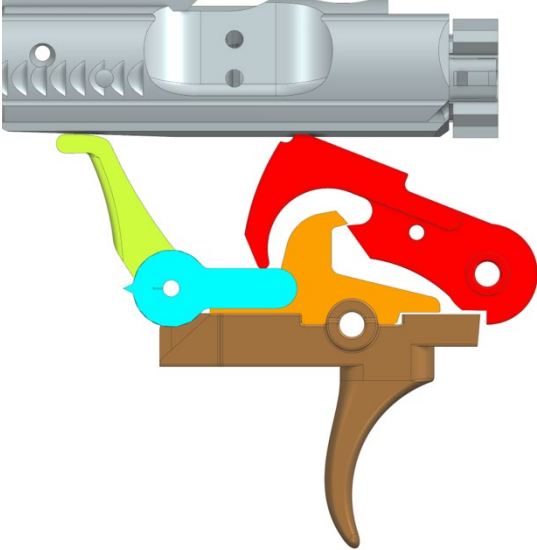
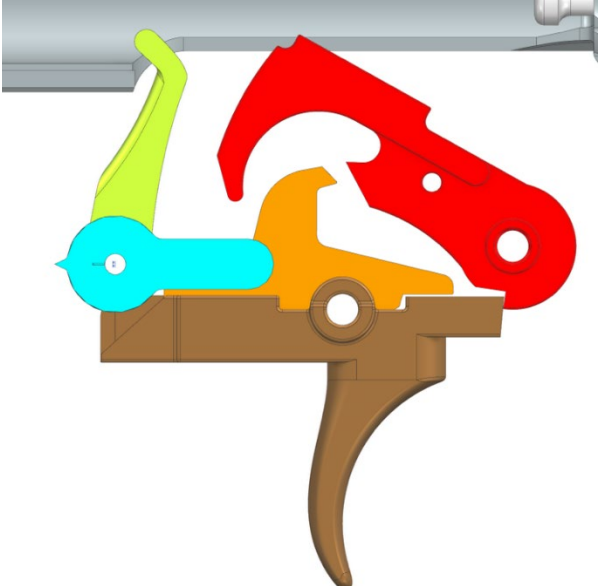


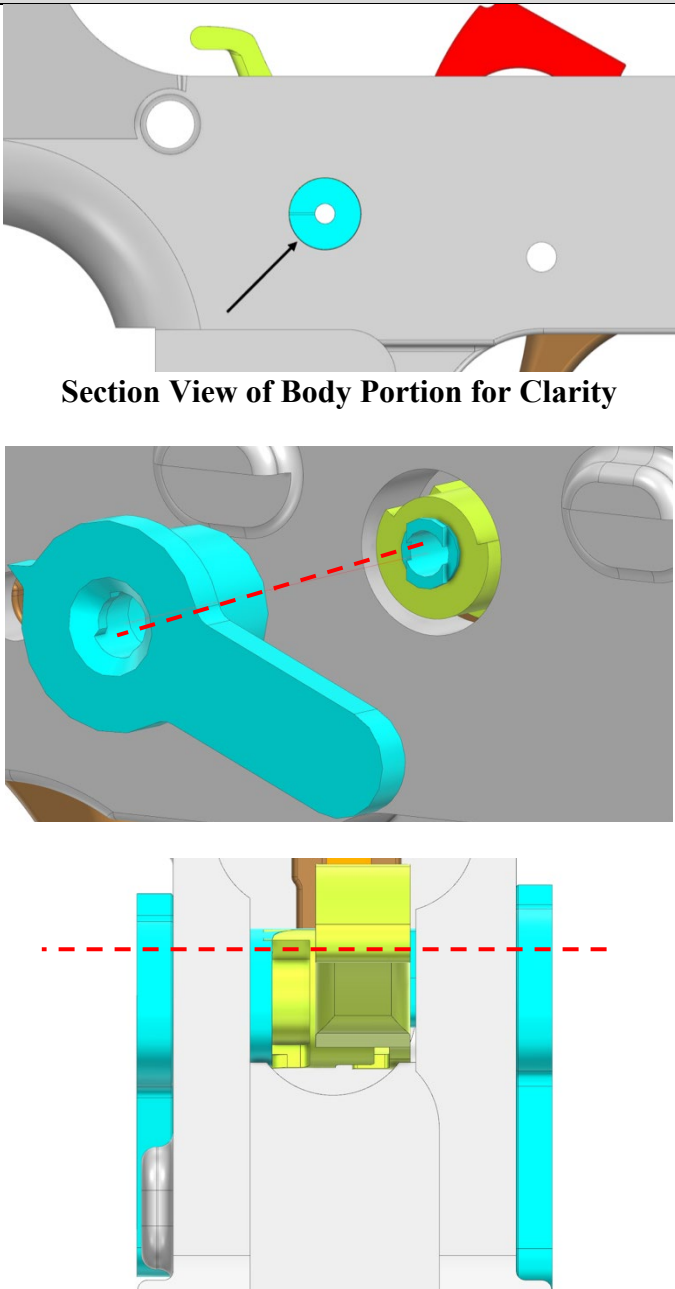
| '784 Patent, Claim 1      | The Atrius Selector                                                                                                                                 |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| and a deflected position. | <p>The lever is now shown deflected independent of the body.</p>  |

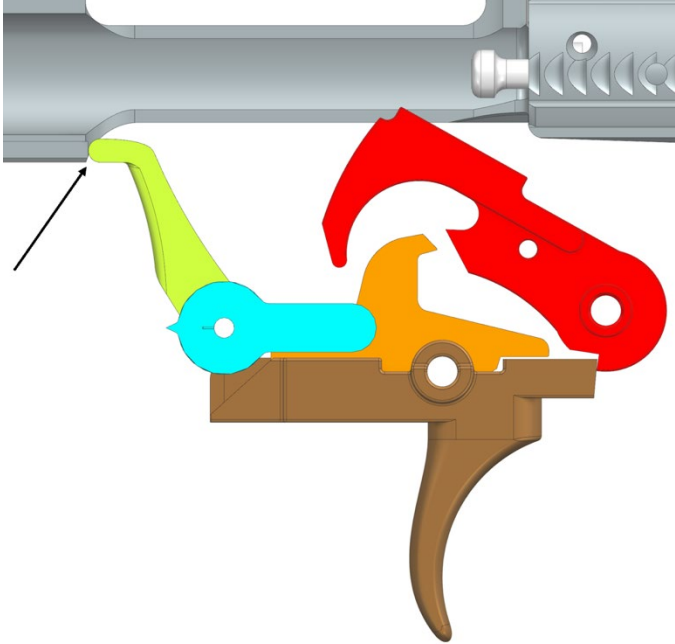
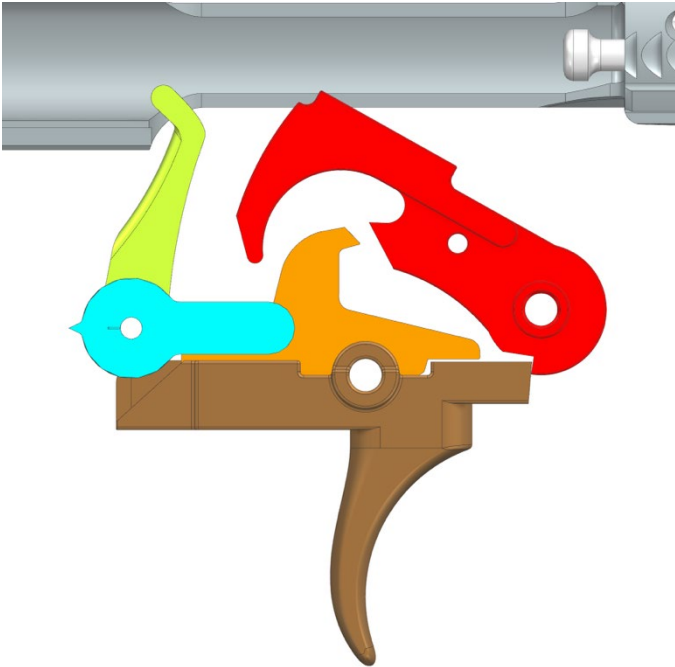
81. An exemplary comparison of the ARC-Fire, when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

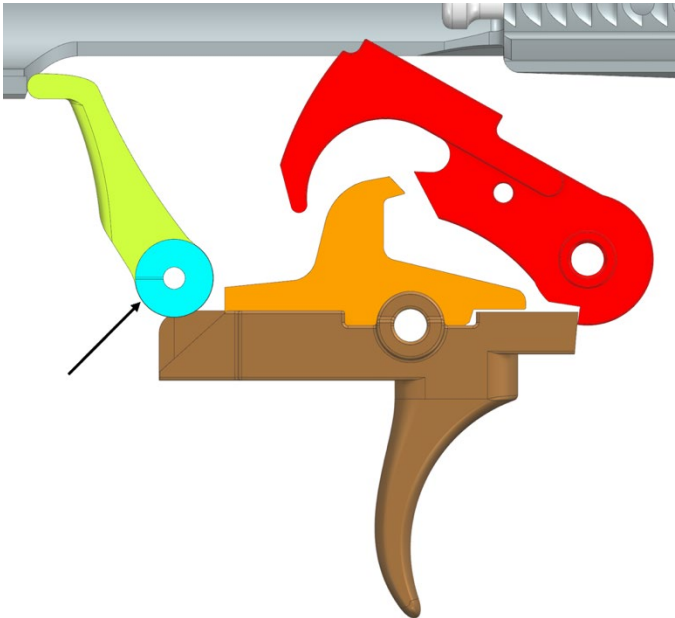
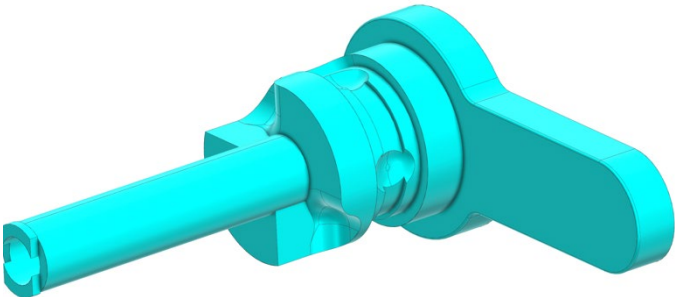
| '784 Patent, Claim 1                                                                                  | The ARC-Fire                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1. In a forced reset trigger mechanism, an extended trigger member locking device, comprising:</p> | <p>When installed and used as directed, the ARC-Fire is part of a "forced reset" trigger mechanism and functions as an extended trigger member locking device.</p>  |

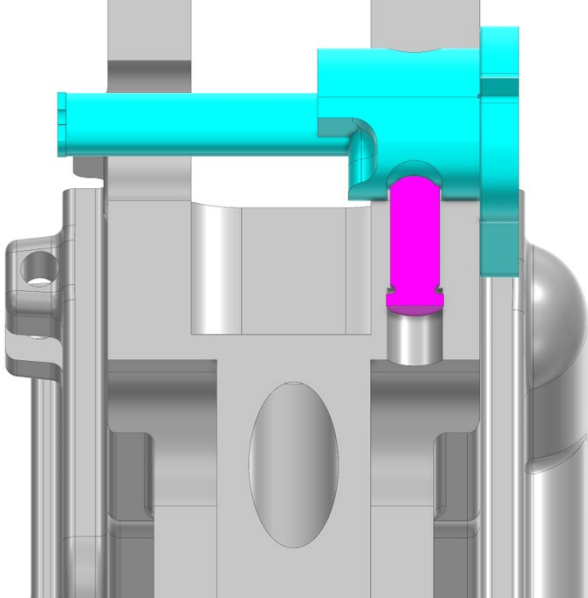
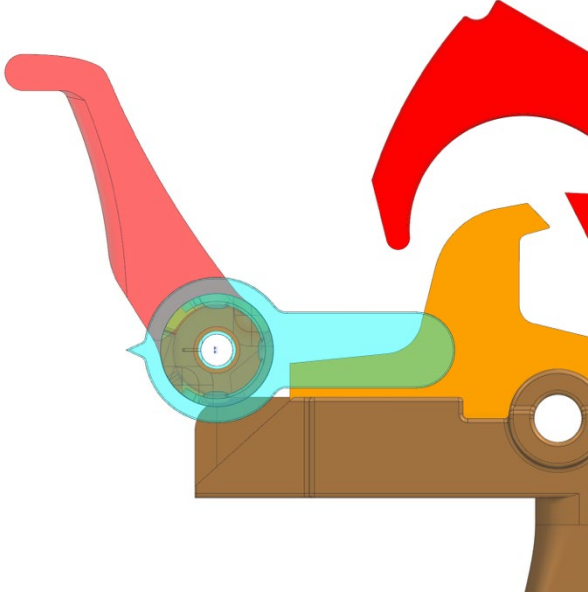
| '784 Patent, Claim 1                                                                                                                                | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                     | <p data-bbox="805 237 1365 302"><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p>  <p data-bbox="1013 884 1154 911"><b>ARC-Fire</b></p>  <p data-bbox="951 1499 1219 1526"><b>ARC-Fire Installed</b></p> <p data-bbox="802 1535 1370 1598">(Plaintiff-generated renderings of ARC-Fire here and below)</p> |
| <p data-bbox="204 1610 651 1751">a locking member that is movable between a first position in which it locks a trigger against pulling movement</p> | <p data-bbox="734 1610 1386 1751">The ARC-Fire (yellow/blue) operates as a locking member and has a first position in which the ARC-Fire locks the trigger member against pulling movement.</p>                                                                                                                                                                                                                                                                                                                                                                                                       |

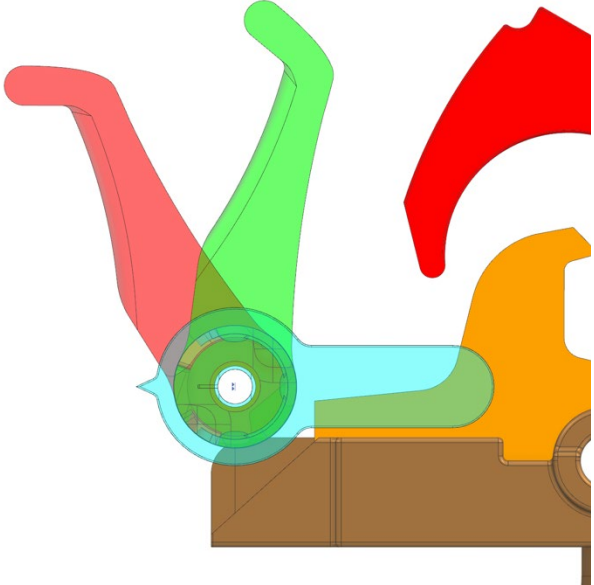
| '784 Patent, Claim 1                                                                                                | The ARC-Fire                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                     |  <p data-bbox="938 789 1230 821"><b>Locked First Position</b></p>                                                                                                                                                                                           |
| <p data-bbox="203 867 711 972">and a second position where it does not restrict movement of the trigger member,</p> | <p data-bbox="732 867 1393 972">The ARC-Fire (yellow/blue) is moveable from the first position to a second position where it does not restrict movement of the trigger member.</p>  <p data-bbox="906 1602 1263 1633"><b>Unlocked Second Position</b></p> |
| <p data-bbox="203 1675 678 1738">the locking member configured to be movably supported by a frame</p>               | <p data-bbox="732 1675 1409 1780">The ARC-Fire (yellow/blue) is movably (pivotally about the axis depicted below) supported by a frame (the lower receiver).</p>                                                                                                                                                                              |

| '784 Patent, Claim 1                                                                                                               | The ARC-Fire                                                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                    |  <p style="text-align: center;"><b>Section View of Body Portion for Clarity</b></p> |
| <p>and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,</p> | <p>The ARC-Fire (yellow/blue) has an upward extending portion (yellow) configured to make actuating contact with a surface of the bolt carrier.</p>                    |

| '784 Patent, Claim 1                                                                                             | The ARC-Fire                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                  |                                                                                                                                                          |
| <p>such actuating contact causing the locking member to move from the first position to the second position,</p> | <p>The actuating contact causes the locking member to move from the first position to the second position.</p>  <p><b>Unlocked Second Position</b></p> |
| <p>the locking member having a body portion that is movably supported</p>                                        | <p>The ARC-Fire (yellow/blue) has a body portion (blue) that is movably supported by the lower receiver using a detent (purple).</p>                                                                                                       |

| '784 Patent, Claim 1 | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <div data-bbox="748 264 1419 877"></div> <p data-bbox="760 888 1406 926"><b>Section View of Body Portion (blue) for Clarity</b></p> <div data-bbox="748 982 1419 1276"></div> <p data-bbox="732 1314 1430 1495">The body portion (blue) has a track with holes that are lined up to correspond to the selectable modes (Fire/ Standard Semi-Automatic, “Forced Reset” Semi-Automatic) which are positively stopped by a detent (purple)</p> |

| '784 Patent, Claim 1                                                                                                                                                                              | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                   |  <p data-bbox="735 869 1380 974">Once installed, the body portion (blue) is movably supported by the lower receiver (grey) using the detent (purple).</p>                                                                                                                                                                                        |
| <p data-bbox="203 1020 708 1199">and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position and a deflected position.</p> | <p data-bbox="735 1020 1433 1230">The ARC-Fire has an upwardly extending deflectable portion (lever arm). The 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 another position where it is deflected (depicted in green).</p>  |

| '784 Patent, Claim 1 | The ARC-Fire                                                                                                                                                                                                                                                              |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <p>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.</p>  |

82. 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, Atrius Selector, and ARC-Fire 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 '784 Patent.

84. 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, Atrius Selector, and ARC-Fire, 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.

85. 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.

86. 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.

87. 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.

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

89. 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.

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 III — INFRINGEMENT OF THE '538 PATENT**

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

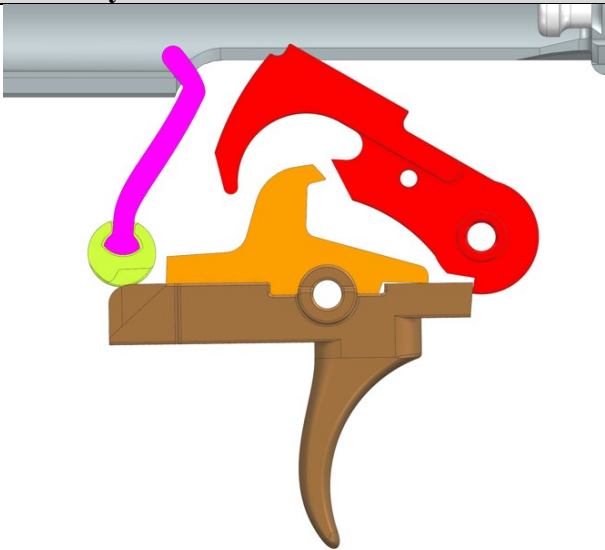
93. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '538 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, 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.

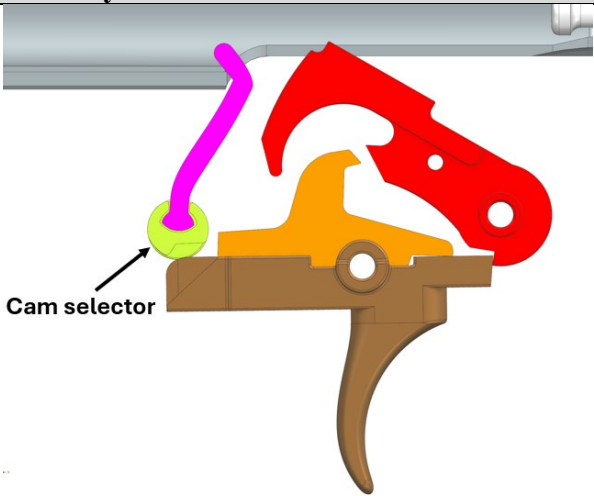
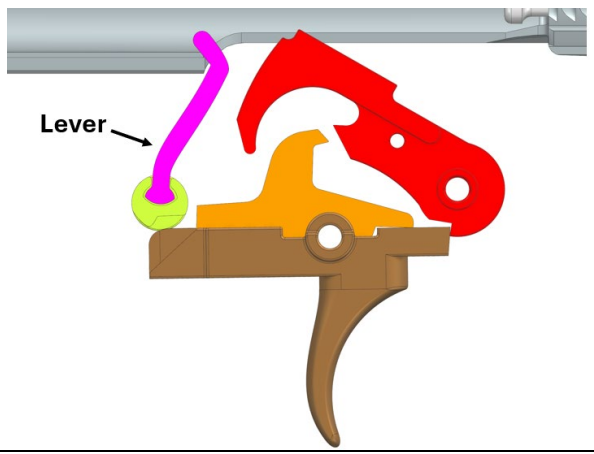
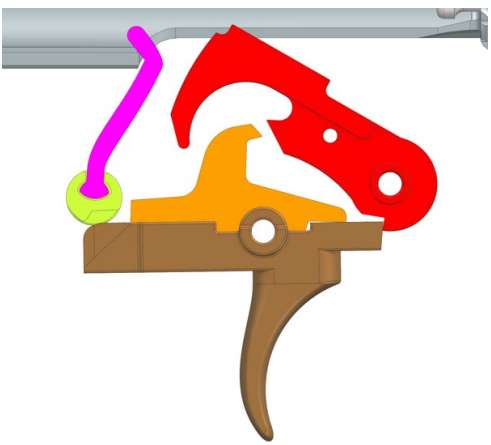
94. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '538 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

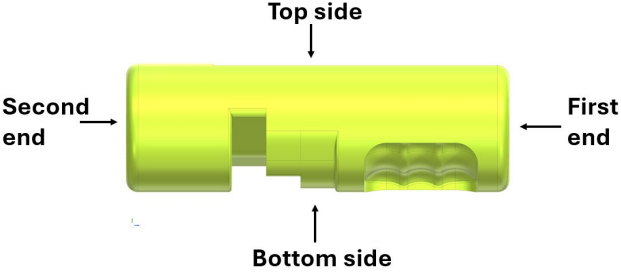
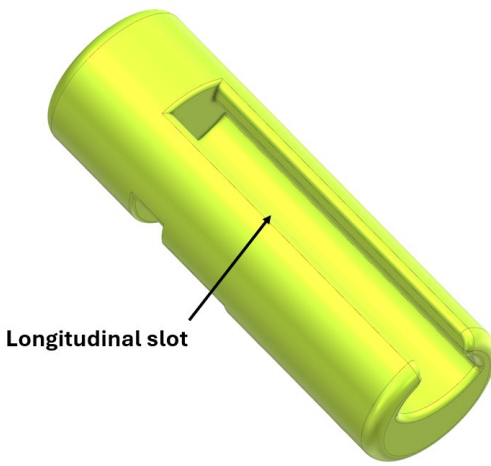
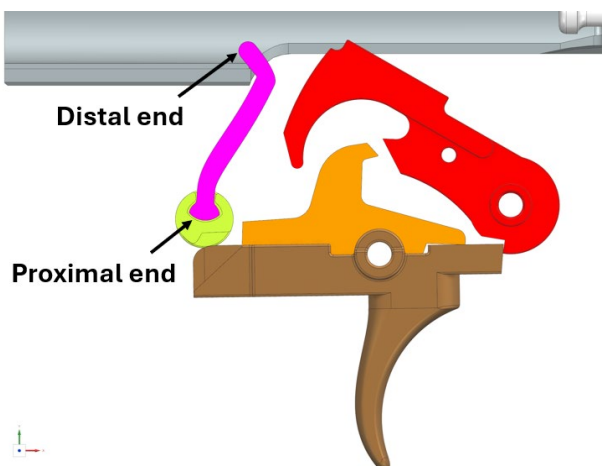
95. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '538 Patent is illustrated in the chart below:

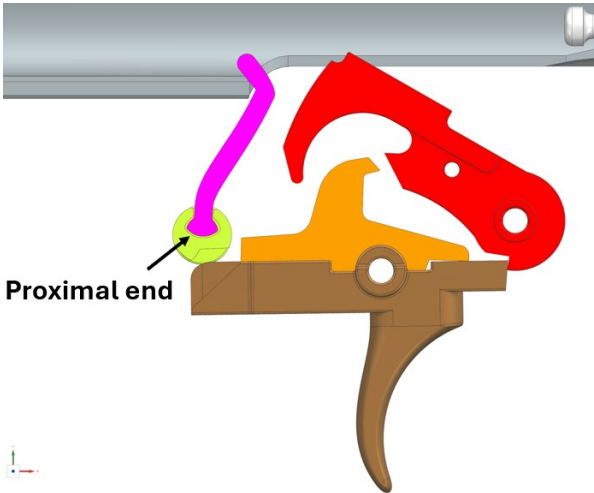
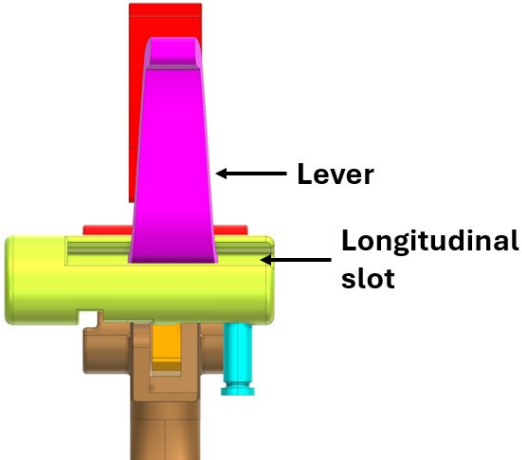
| <b>'538 Patent, Claim 1</b>                     | <b>The Super Safety</b>                                                                                          |
|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| 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. |

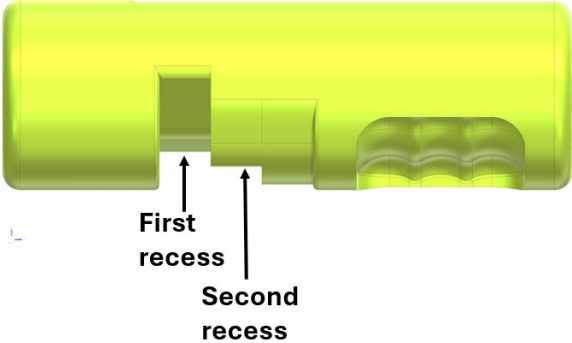
| '538 Patent, Claim 1 | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <div data-bbox="787 262 1242 997" data-label="Image"></div> <div data-bbox="630 1031 1403 1102" data-label="Text"><p><a href="https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits">https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits</a></p></div> <div data-bbox="797 1117 1235 1556" data-label="Image"></div> <div data-bbox="909 1554 1120 1596" data-label="Text"><p><b>(Super Safety)</b></p></div> <div data-bbox="600 1589 1435 1667" data-label="Text"><p>Ex. J, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12.</p></div> |

| '538 Patent, Claim 1 | The Super Safety                                                                                                                                                                                                                                                                                                                                              |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |  <p data-bbox="867 783 1169 814"><b>Super Safety Installed</b></p> <p data-bbox="683 856 1354 961">(Plaintiff-generated renderings of Super Safety here and below; cam selector and bolt carrier shown in section view for clarity)</p>                                     |
| a cam selector;      | <p data-bbox="605 968 1419 1035">The Super Safety includes a dual mode cam selector that allows for selection of safe, active reset, and passive reset modes.</p>  <p data-bbox="824 1440 1208 1507"><b>Dual Mode Cam Selector</b><br/>Ex. J, Super Safety Guide at 1</p> |

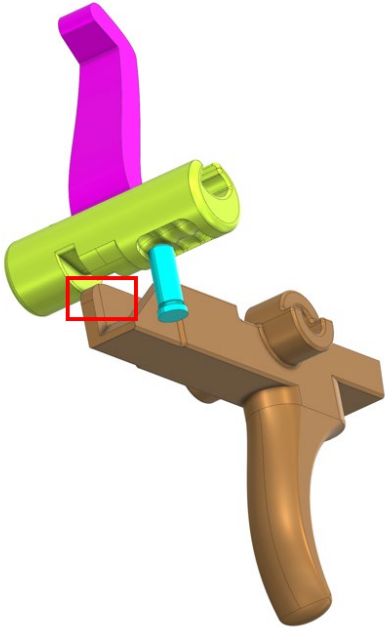
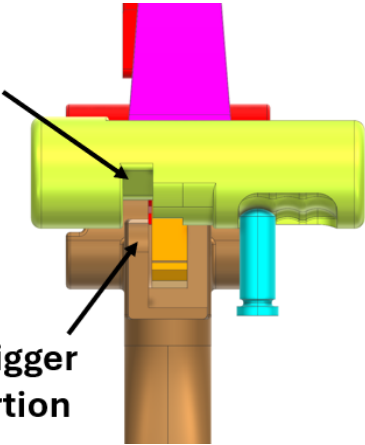
| '538 Patent, Claim 1 | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |  <p>A diagram of a mechanical assembly. A horizontal grey bar is at the top. Below it, a red component is angled upwards. A yellow component is below the red one. A brown trigger is at the bottom. A green circular cam selector is on the yellow component, with a pink lever extending upwards from it. An arrow points to the green circle with the label "Cam selector".</p> |
| a lever;             | <p>The Super Safety has a lever (pink) extending upward from the cam selector.</p>  <p>A diagram of the same mechanical assembly as above. An arrow points to the pink lever with the label "Lever".</p>                                                                                                                                                                          |
| a trigger;           | <p>The cam selector operates on a trigger. (brown)</p>  <p>A diagram of the same mechanical assembly as above. The brown trigger is highlighted.</p>                                                                                                                                                                                                                             |

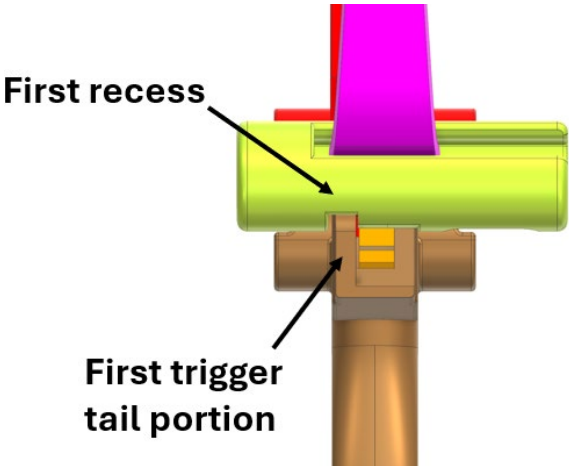
| '538 Patent, Claim 1                                                                            | The Super Safety                                                                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| the cam selector comprising a first end, a second end, a top side, and a bottom side;           | <p>The Super Safety dual mode cam selector has two ends, a top side, and a bottom side as illustrated below.</p>                                      |
| the cam selector comprising a longitudinal slot positioned on the top side of the cam selector; | <p>The Super Safety dual mode cam selector comprises a longitudinal slot that is positioned on the top side and extends along the cam selector.</p>  |
| the lever comprising a proximal end and a distal end;                                           | <p>The Super Safety lever (pink) has a proximal end and a distal end, as illustrated below.</p>                                                     |

| '538 Patent, Claim 1                                                                    | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>the longitudinal slot being configured to receive the proximal end of the lever;</p> | <p>The longitudinal slot on the top side of the cam selector (yellow) is configured to receive the proximal end of the lever (pink).</p>  <p>Ex. J, Super Safety Guide at 12</p>  <p>Proximal end</p>  <p>Lever</p> <p>Longitudinal slot</p> <p>Super Safety Installed</p> |

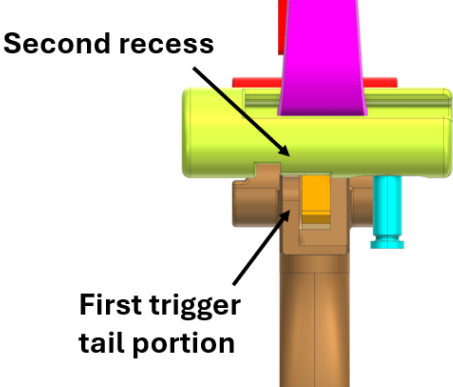
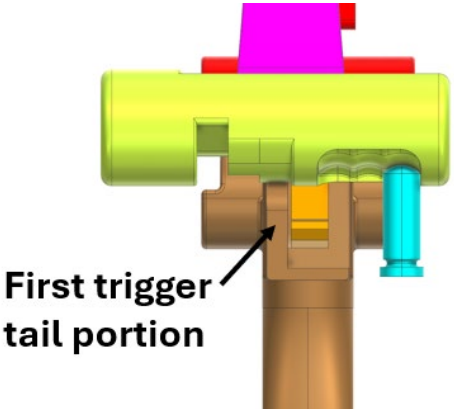
| '538 Patent, Claim 1                                                                                                  | The Super Safety                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>the cam selector further comprising a first recess and a second recess on the bottom side of the cam selector;</p> | <p>The Super Safety dual mode cam selector has a first recess and a second recess on the bottom side of the cam.</p>  <p style="text-align: center;">First recess<br/>Second recess</p> |
| <p>the trigger comprising a first trigger tail portion;</p>                                                           | <p>The Super Safety dual mode trigger has a first trigger tail portion, shown in the red box below.</p>  <p style="text-align: center;">Ex. J, Super Safety Guide at 10.</p>           |

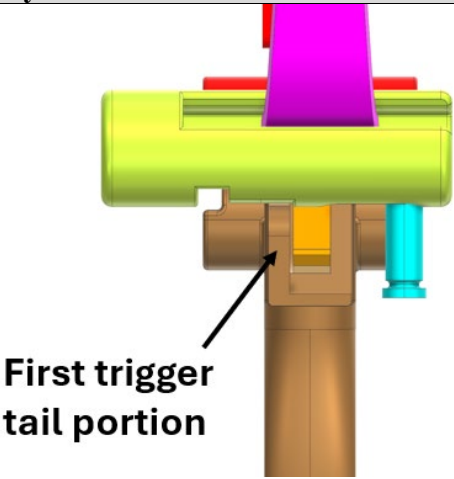


| '538 Patent, Claim 1                                                                                                                           | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>the cam selector being configured to operate between a first mode, a second mode, and a third mode;</p>                                     | <p>The Super Safety dual mode cam is operable in three modes: (1) passive reset (standard semi-automatic) (2) active reset, and (3) safe. Super Safety Guide at 1.</p>                                                                                                                                                                                                                                                                                                                                                                                |
| <p>wherein the first mode of the cam selector is configured to allow the first trigger tail portion to be movable within the first recess,</p> | <p>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.</p> <div data-bbox="716 1220 1284 1696">  <p><b>First recess</b></p> <p><b>First trigger tail portion</b></p> <p><b>Standard Semi-Automatic Mode</b></p> </div> <p>When the cam selector is in the first mode, the first trigger tail portion is movable within the first recess of the cam.</p> |

| '538 Patent, Claim 1 | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      | <div data-bbox="792 239 1252 743">A side-view diagram of a trigger assembly. A brown trigger is mounted on a base. A yellow lever is pivoted on the base. A red cam is attached to the lever. A purple spring is connected to the lever and the base. The cam is in a position that blocks the trigger's movement.</div> <p data-bbox="867 751 1170 785"><b>Super Safety Installed</b></p> <div data-bbox="779 835 1263 1272">A side-view diagram of the same trigger assembly as above. The purple spring is now extended, pulling the yellow lever and the red cam away from the trigger, allowing it to move.</div> <div data-bbox="721 1352 1286 1814">A top-down view of the trigger assembly. A purple rectangular piece is inserted into a slot in the trigger. An arrow points to a recessed area in the trigger, labeled "First recess". Another arrow points to a tail portion of the trigger, labeled "First trigger tail portion".</div> <p data-bbox="646 1822 1390 1883"><b>Super Safety Installed, Trigger Pulled, Lever and Cam Rotated</b></p> |

| '538 Patent, Claim 1                                                                                                                                                                                                               | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>wherein the second mode of the cam selector is configured to allow the first trigger tail portion to engage the second recess</p> <p>and be moved down by a cam portion of the second recess when the cam selector rotates,</p> | <p>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.</p> <div data-bbox="699 333 1250 856" data-label="Image"> <p><b>Active Reset Mode</b></p> </div> <p>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.</p> <div data-bbox="779 1071 1258 1680" data-label="Image"> <p><b>Super Safety Installed, Trigger Pulled</b></p> </div> |

| '538 Patent, Claim 1                                                                                          | The Super Safety                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                               |  <p data-bbox="695 730 1341 762"><b>Super Safety Installed, Lever and Cam Rotated</b></p>                                                                                             |
| <p>and wherein the third mode of the cam selector is configured to prevent the trigger from being pulled.</p> | <p>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.</p>  |

| '538 Patent, Claim 1 | The Super Safety                                                                                                                                         |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |  <p data-bbox="802 575 1013 667"><b>First trigger tail portion</b></p> |

96. 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.

97. 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.

98. 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.

99. 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.

100. 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.

101. 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.

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

103. 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.

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.

#### **COUNT IV — INFRINGEMENT OF THE '159 PATENT**

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

107. 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, Atrius Selector, and ARC-Fire.

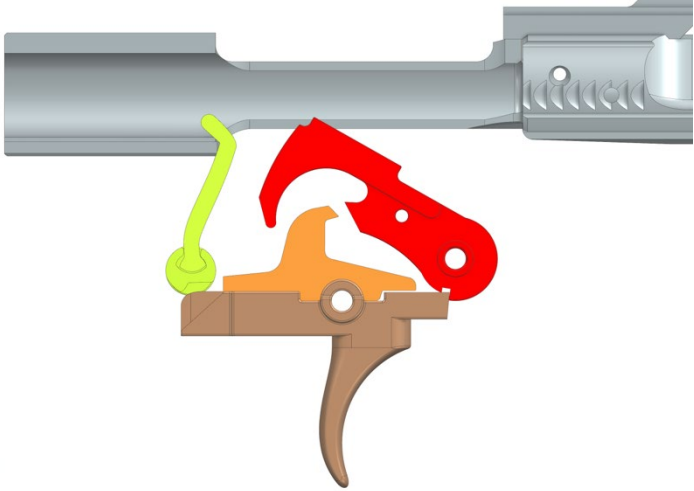
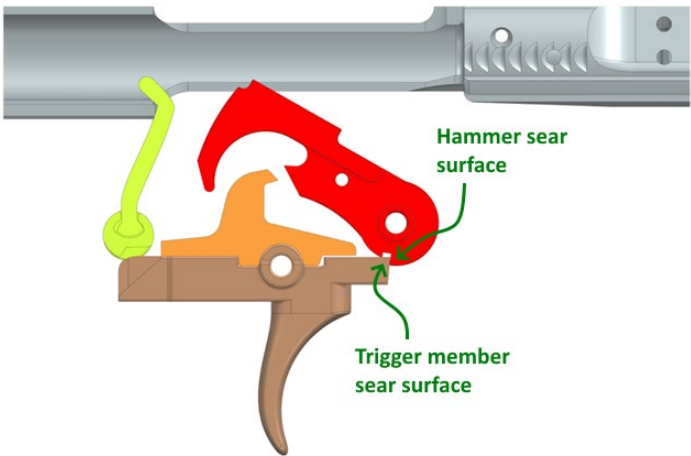
108. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

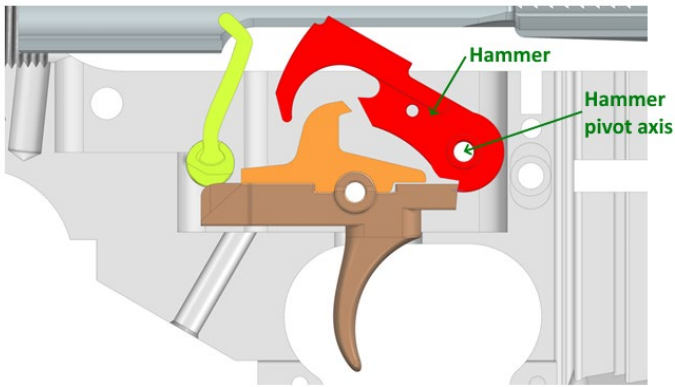
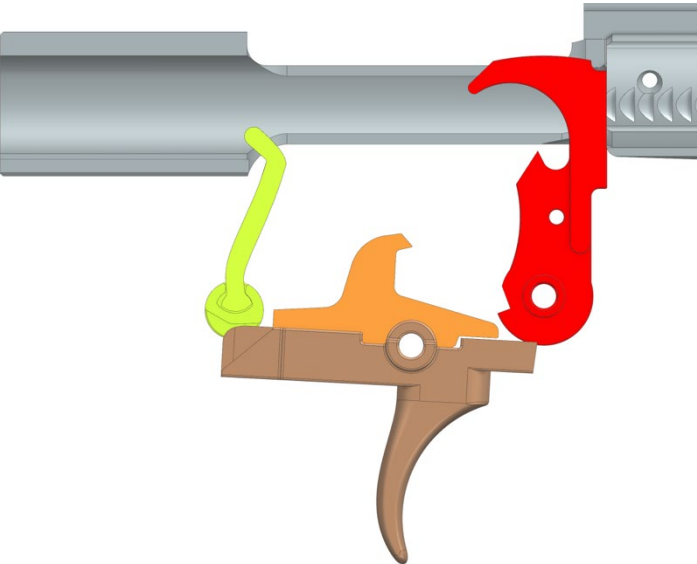
109. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

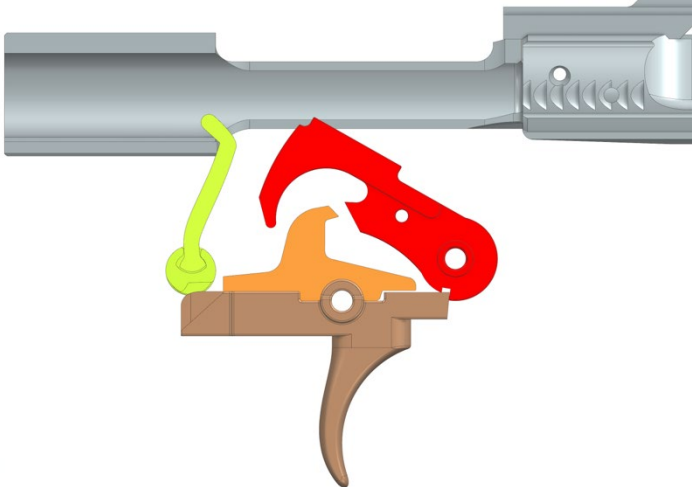
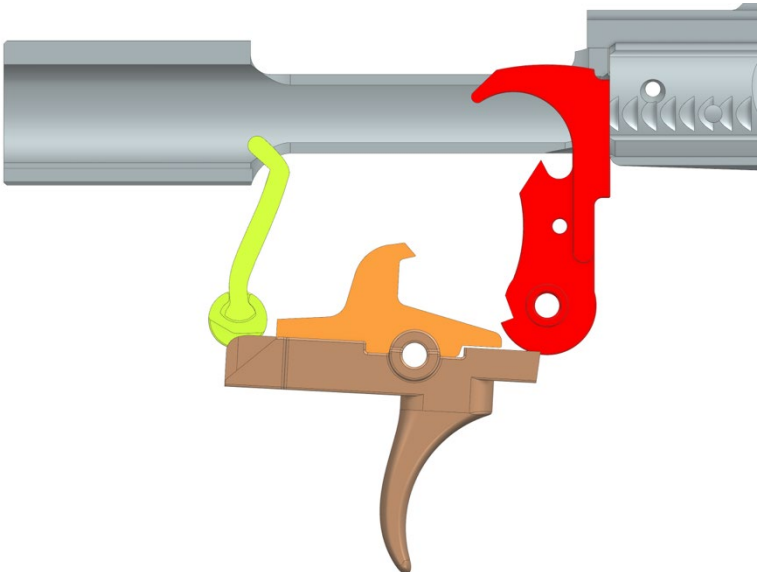
| '159 Patent Claim 1                                                                                                                                                                                                                                                      | The Super Safety                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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 trigger mechanism that uses a bolt means. With the Super Safety installed, the trigger mechanism operates in a standard semi-automatic mode and a "forced reset" semi-automatic mode |

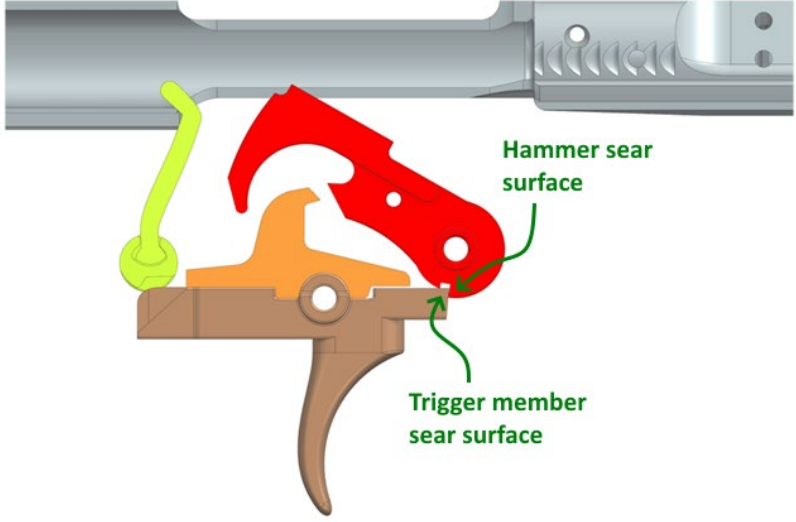
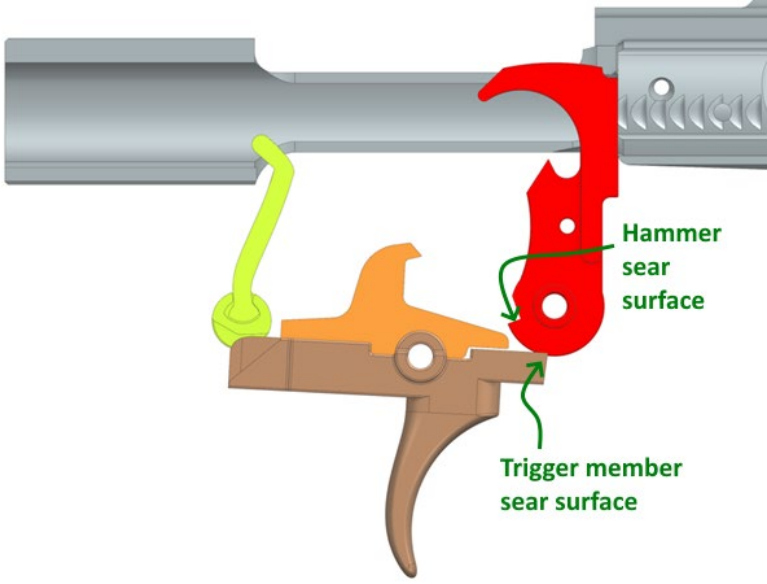
| '159 Patent Claim 1 | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     | <div data-bbox="753 243 1203 980" data-label="Image"> </div> <div data-bbox="555 1008 1414 1087" data-label="Text"> <p><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p> </div> <div data-bbox="743 1098 1214 1572" data-label="Image"> </div> <div data-bbox="885 1587 1075 1629" data-label="Section-Header"> <p><b>Super Safety</b></p> </div> <div data-bbox="571 1638 1395 1717" data-label="Text"> <p>Ex. J, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12</p> </div> |

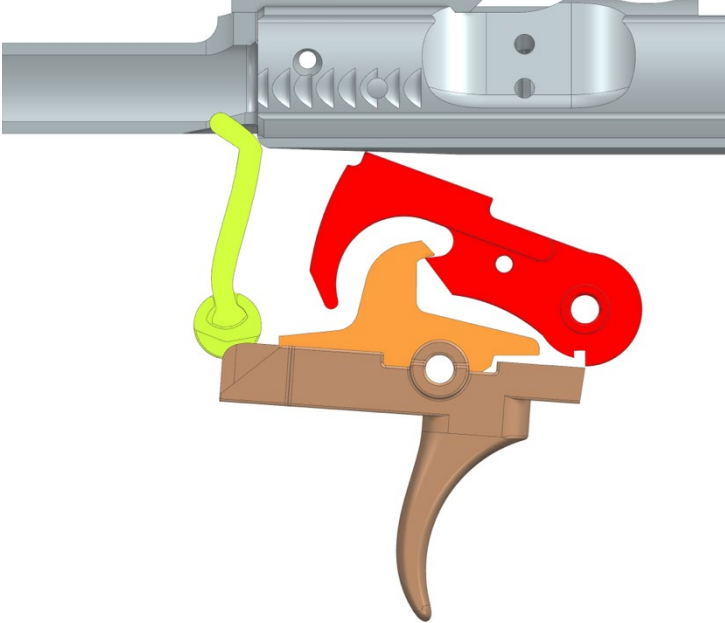
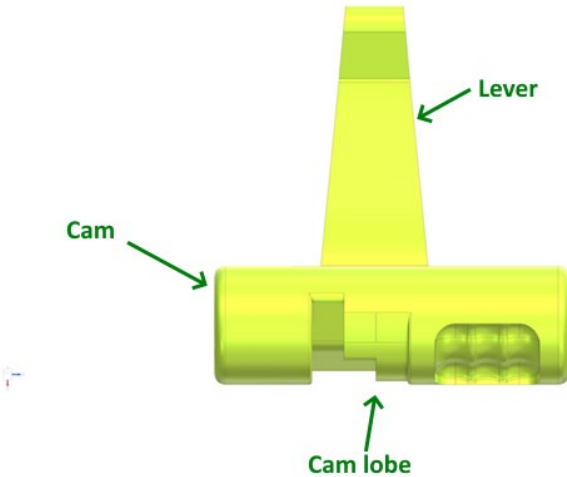


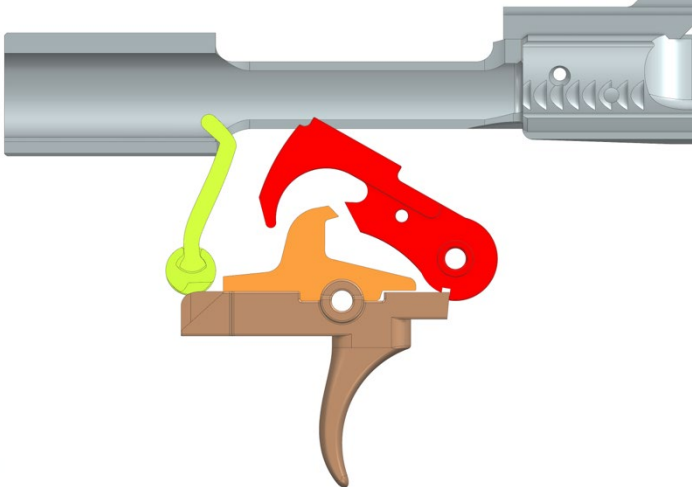
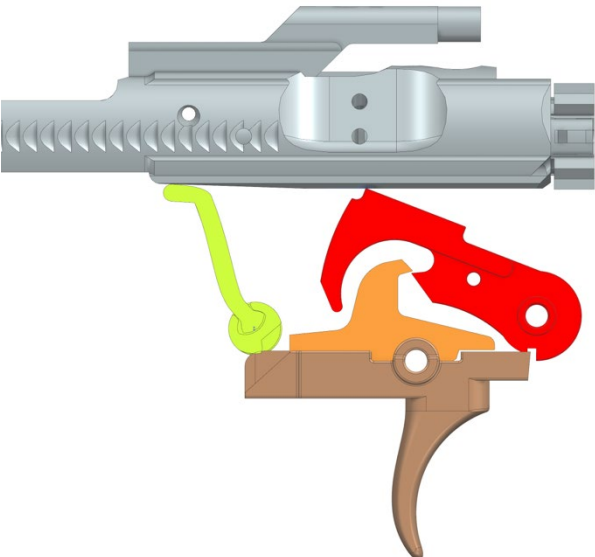
| '159 Patent Claim 1                                                                                                                                                   | The Super Safety                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                       |  <p style="text-align: center;"><b>Super Safety (Installed)</b><br/>(Plaintiff-generated renderings of the Super Safety here and below)</p>                                                                                                                             |
| <p>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</p>               | <p>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 disconnector (orange).</p>  <p style="text-align: center;"><b>Super Safety (Installed)</b></p> |
| <p>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,</p> | <p>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.</p>                                                                                                                                                   |

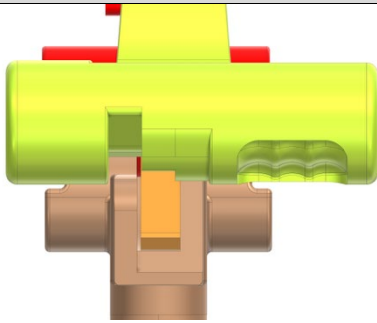
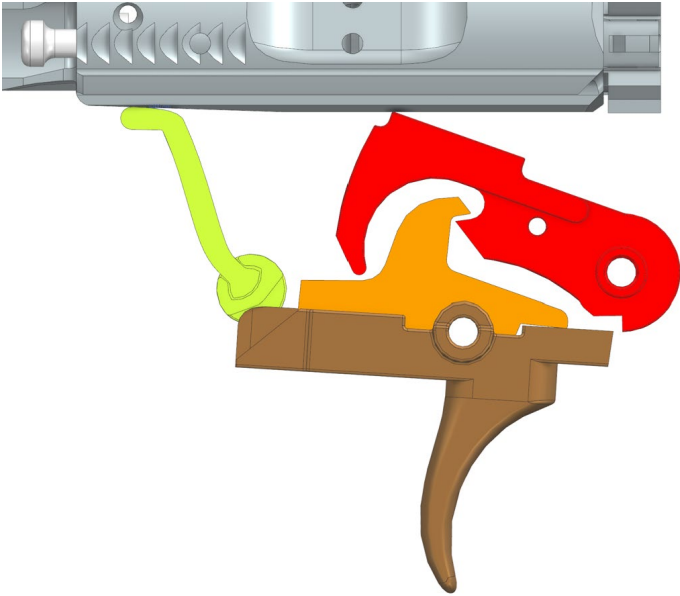
| '159 Patent Claim 1                                                                                                                                                     | The Super Safety                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                         |  <p data-bbox="841 657 1130 688"><b>Hammer Set Position</b></p>  <p data-bbox="802 1362 1169 1394"><b>Hammer Released Position</b></p> |
| <p>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</p> | <p>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.</p>                                         |

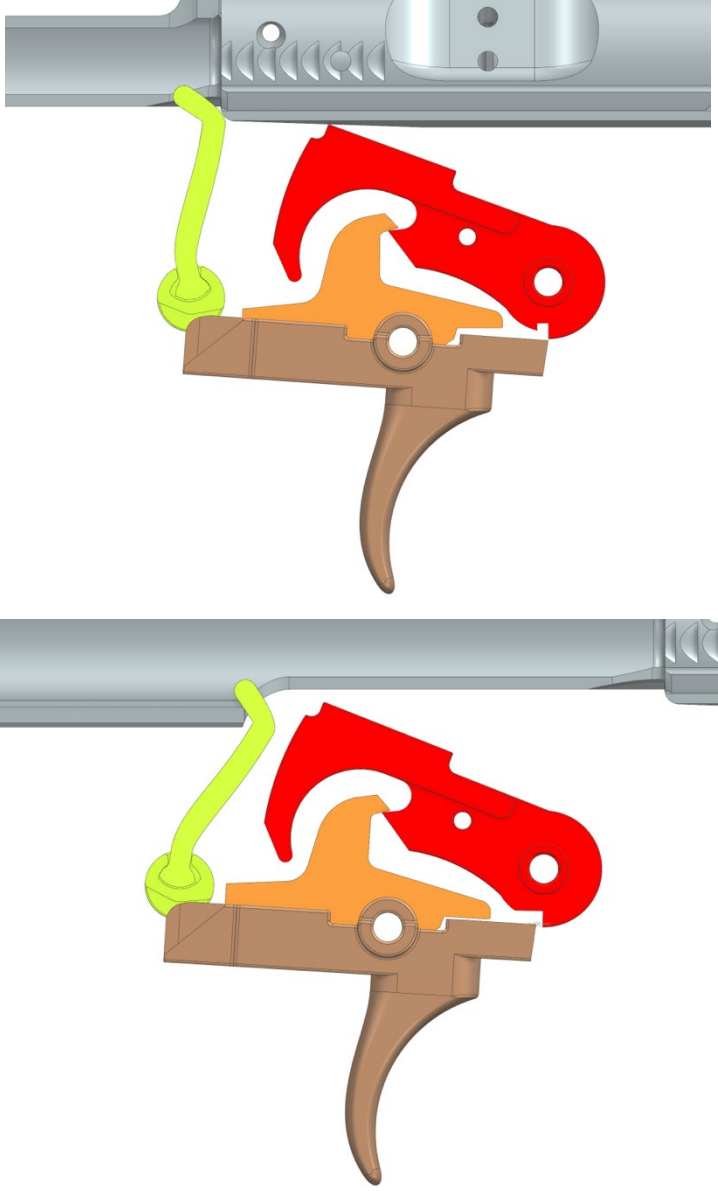
| '159 Patent Claim 1                                                                                                                            | The Super Safety                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>between set and</p> <p>released positions,</p>                                                                                              |  <p><b>Trigger Member Set Position</b></p>  <p><b>Trigger Member Released Position</b></p> |
| <p>wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member</p> | <p>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.</p>                                                                                     |

| '159 Patent Claim 1                                                                                                                        | The Super Safety                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                            |  <p style="text-align: center;"><b>Trigger Member and Hammer Member Set Position</b></p>                                                                                                                                                         |
| <p>and are out of engagement in the released positions of the hammer and trigger member,</p>                                               | <p>The sear surface of the trigger member (brown) and sear catch surface of the hammer (red) are out of engagement in the released position.</p>  <p style="text-align: center;"><b>Trigger Member and Hammer Member Released Positions</b></p> |
| <p>the disconnecter having a hook for engaging the hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a</p> | <p>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).</p>                                                                                                                        |

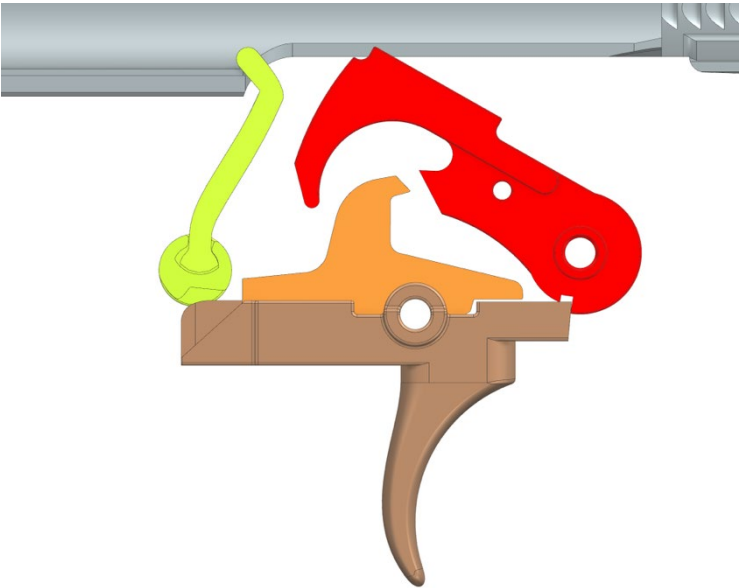
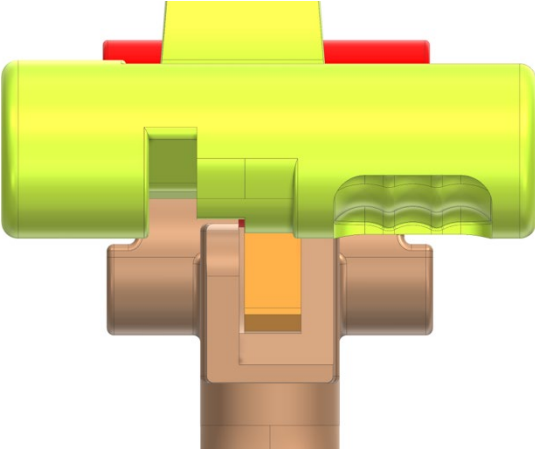
| '159 Patent Claim 1                                                                                                  | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| transverse disconnecter pivot axis, and                                                                              |  <p style="text-align: center;"><b>Disconnecter Hook Engaged</b></p>                                                                                                                                                                                                                                                  |
| a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,                      | <p>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)</p>  <p style="text-align: center;"><b>Super Safety Cam with Lobe and Lever</b></p> |
| 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.                                                                                                                                                                                                                                                                                                                                      |

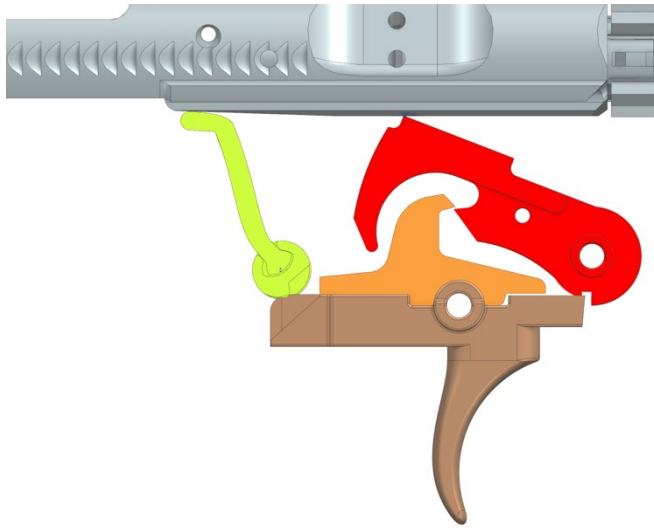
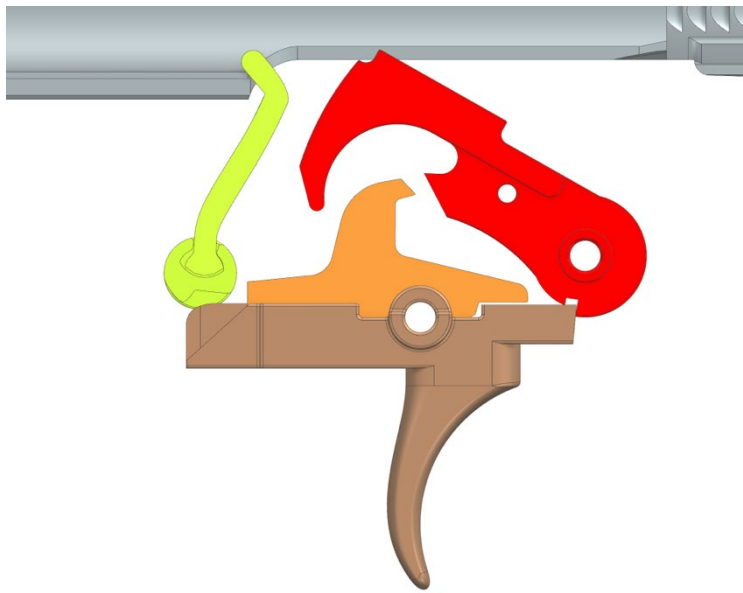
| '159 Patent Claim 1                     | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| trigger member toward the set position, |  <p data-bbox="787 741 1185 772"><b>Cam and Lobe First Position</b></p> <p data-bbox="553 793 1406 898">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.</p>  <p data-bbox="771 1497 1201 1528"><b>Cam and Lobe Second Position</b></p> |
| whereupon in the first mode,            | While in the first (standard semi-automatic) mode,                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

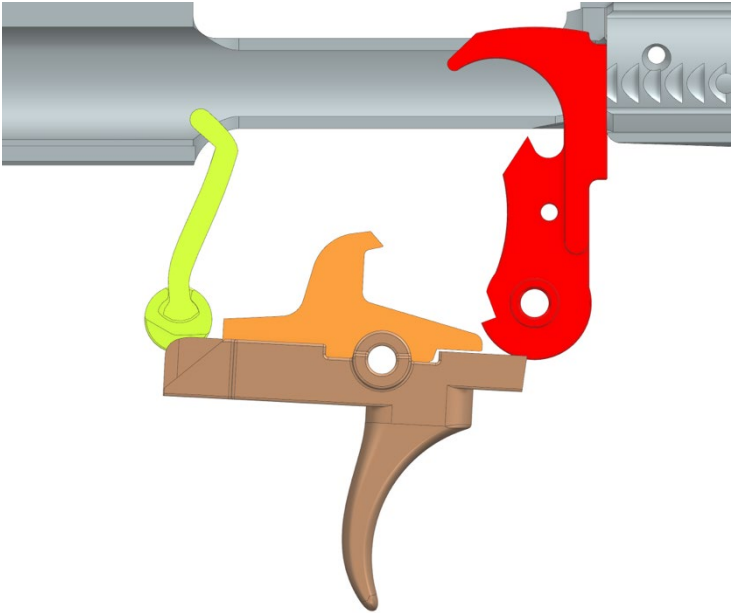
| '159 Patent Claim 1                                                                                                                        | The Super Safety                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                            |                                                                                                                                                                                                                                                |
| <p>rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook,</p> | <p>... rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.</p>  <p style="text-align: center;"><b>Disconnecter Hook Catches the Hammer</b></p> |
| <p>and thereafter the bolt means moves forward into battery,</p>                                                                           | <p>Thereafter, the bolt means moves forward into battery,</p>                                                                                                                                                                                                                                                                    |

| '159 Patent Claim 1                                                                                                                                                                                                                  | The Super Safety                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                      |  <p data-bbox="683 1461 1289 1493"><b>Pressure on Trigger Member Prevents Reset</b></p>                                                                                                                  |
| <p>at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnector to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger</p> | <p>... at which time a user must manually reduce pressure on the trigger member (brown) to free the 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.</p> |



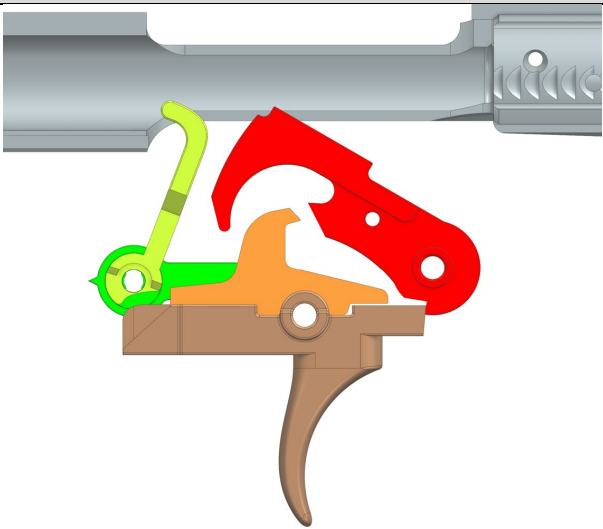
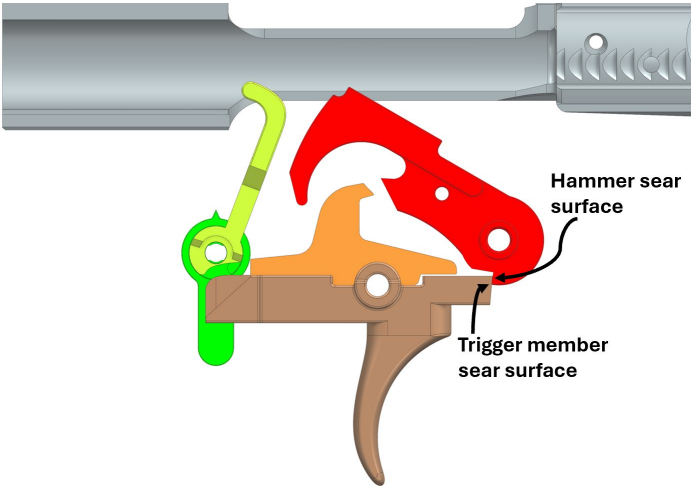
| '159 Patent Claim 1                                                                                                                                                                                                                                  | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| member to fire the firearm, and                                                                                                                                                                                                                      |  <p data-bbox="634 852 1338 888"><b>Reduced Pressure on Trigger Member Allows Reset</b></p>                                                                                                                                                                                                                                                                                             |
| <p data-bbox="201 911 527 978">whereupon in a second mode,</p> <p data-bbox="201 1423 527 1675">rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnector hook is prevented from holding the hammer,</p> | <p data-bbox="553 911 1305 940">When in the second (“forced reset” semi-automatic) mode,</p>  <p data-bbox="553 1423 1409 1566">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 disconnector (orange) hook is prevented from holding the hammer hook.</p> |

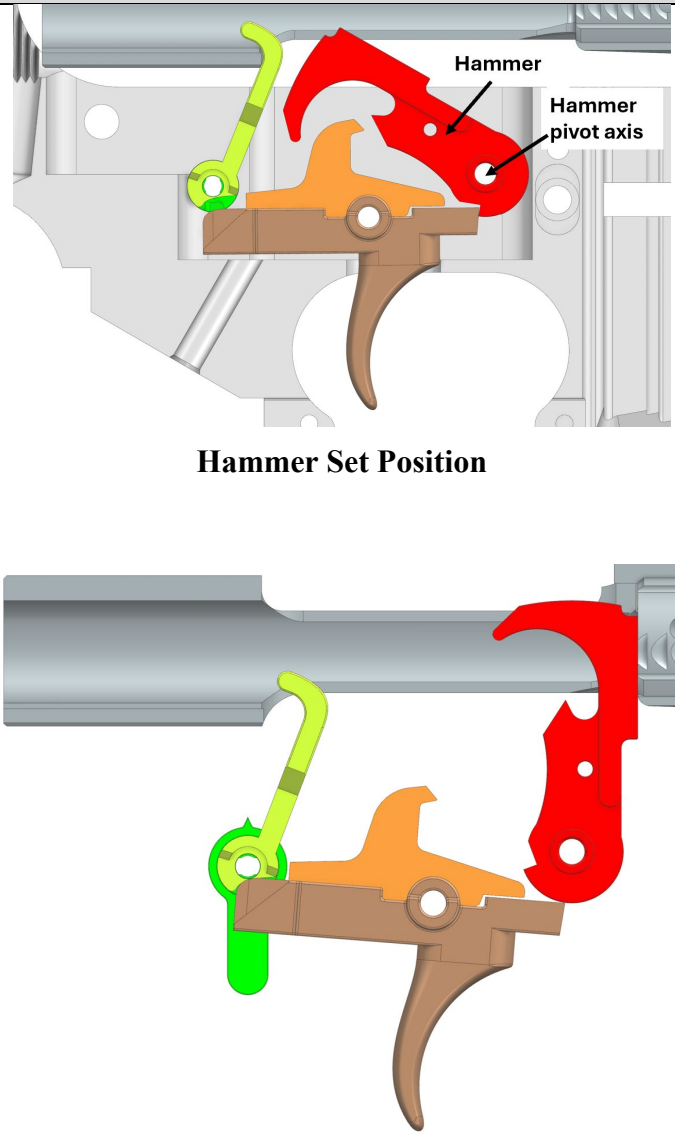
| '159 Patent Claim 1                                                                                                                             | The Super Safety                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                 |                                                                                                                                                                                                                                                                      |
| <p>and thereafter the bolt means moves forward into battery,</p> <p>at which time the user can pull the trigger member to fire the firearm.</p> | <p>Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position,</p>  <p>... 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.</p> |

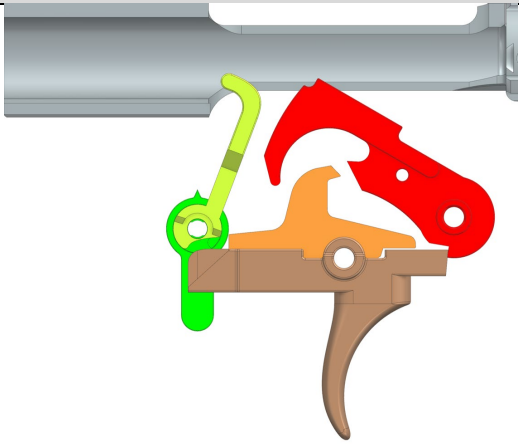
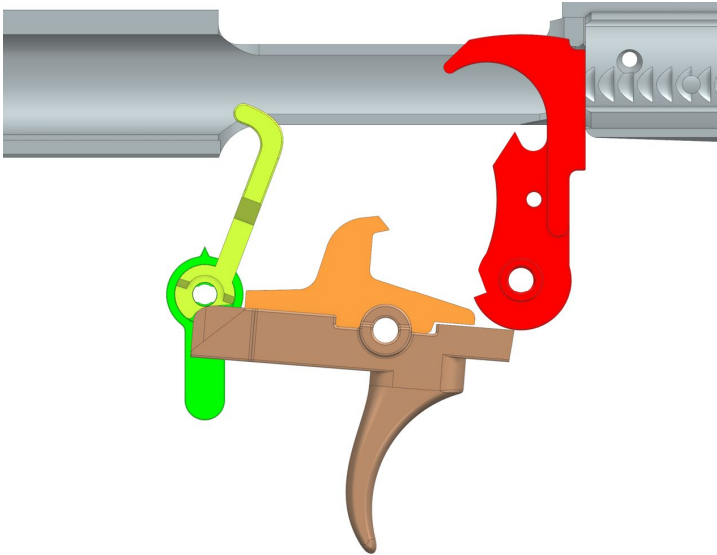
| '159 Patent Claim 1 | The Super Safety                                                                   |
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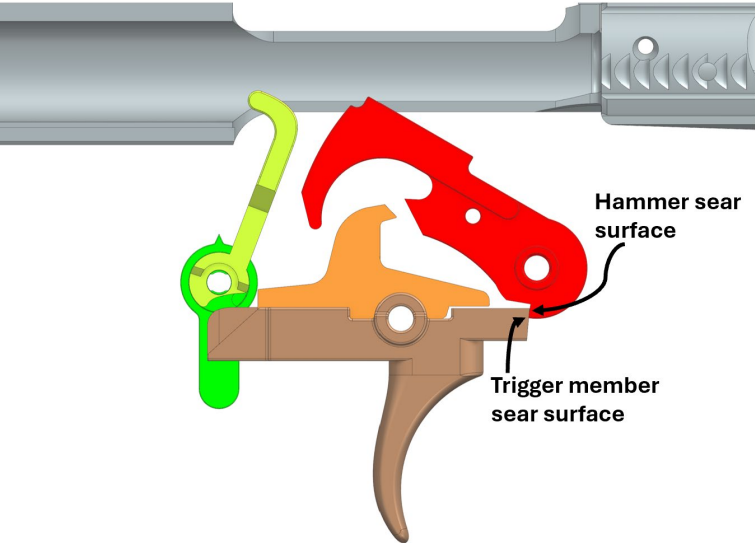
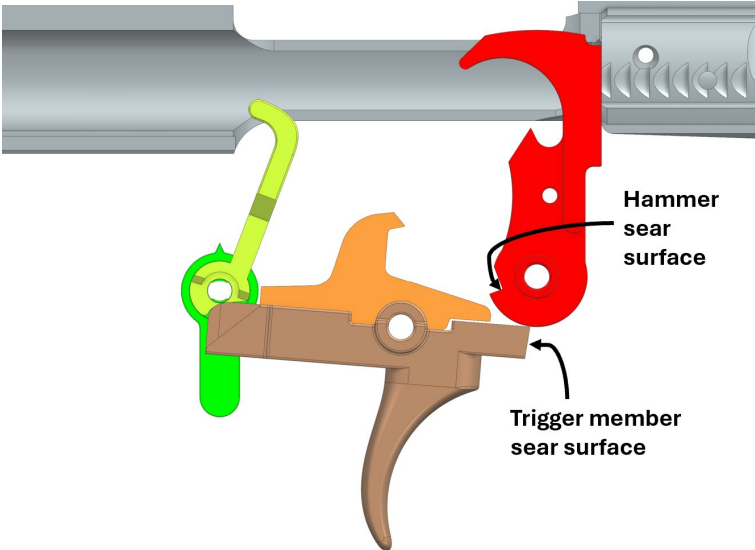
110. An exemplary comparison of the Atrius Selector, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

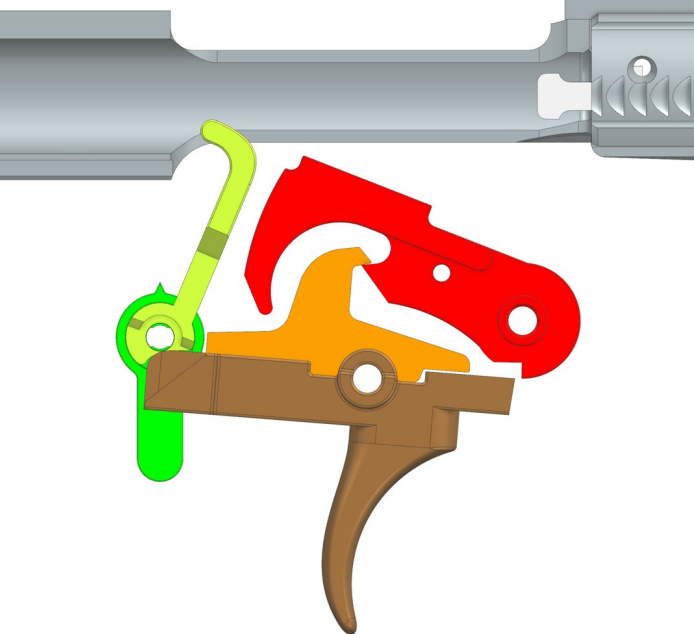
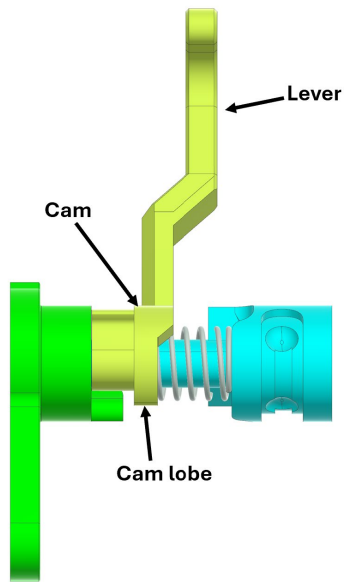
| '159 Patent, Claim 1                                                                                                                                                                                                                                                            | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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:</p> | <p>When installed and used as directed, the Atrius Selector is part of a firearm trigger mechanism that uses a bolt means. With the Atrius Selector installed, the trigger mechanism operates in a standard semi-automatic mode and a “forced reset” semi-automatic mode</p>  <p><a href="https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits">https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits</a></p> <p><b>Atrius Selector</b></p> |

| '159 Patent, Claim 1                                                                                                                                    | The Atrius Selector                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                         |  <p><b>Atrius Selector (Installed)</b><br/>(Plaintiff-generated renderings of the Atrius Selector here and below)</p>                                                                                                                             |
| <p>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</p> | <p>The Atrius Selector (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 disconnector (orange).</p>  <p><b>Atrius Selector (Installed)</b></p> |
| <p>to pivot on a transverse hammer pivot axis between set and released positions, the hammer adapted to be pivoted rearward by rearward</p>             | <p>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.</p>                                                                                                                             |

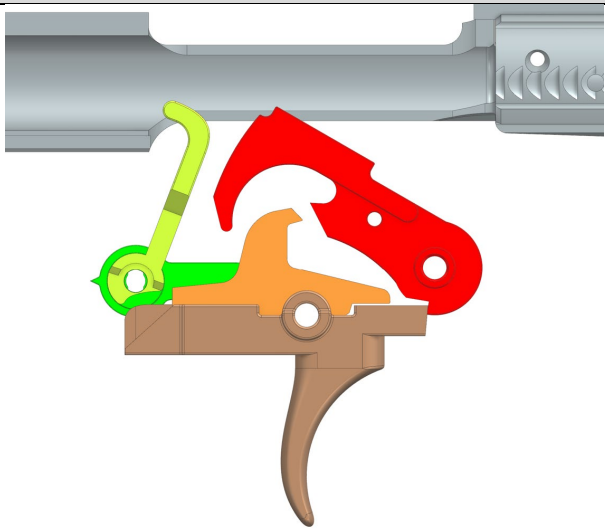
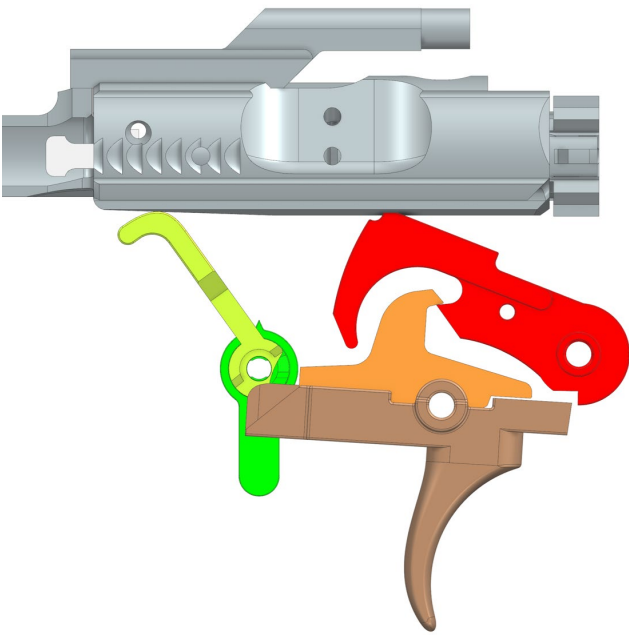
| '159 Patent, Claim 1                                                                                                                                                    | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>movement of a bolt means,</p>                                                                                                                                        |  <p>The top diagram, labeled "Hammer Set Position", shows a cross-section of the mechanism. A red hammer is pivoted on a horizontal axis, labeled "Hammer pivot axis". A yellow atrius selector is positioned to the left of the hammer, and a brown trigger member is below it. The bottom diagram, labeled "Hammer Released Position", shows the same mechanism with the hammer moved to the right, away from the trigger member. The atrius selector (yellow) and trigger member (brown) are shown in their respective positions relative to the hammer's pivot axis.</p> <p style="text-align: center;"><b>Hammer Set Position</b></p> <p style="text-align: center;"><b>Hammer Released Position</b></p> |
| <p>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</p> | <p>The Atrius Selector (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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

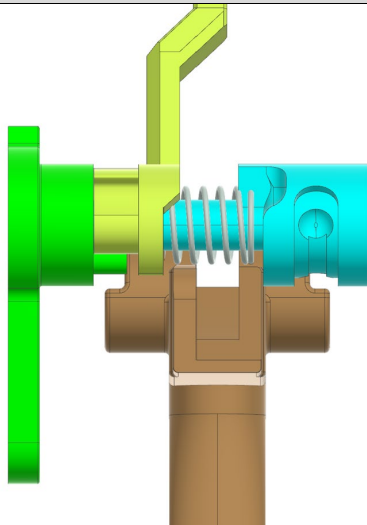
| '159 Patent, Claim 1                                                                                                                           | The Atrius Selector                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>between set and</p> <p>released positions,</p>                                                                                              |  <p><b>Trigger Member Set Position</b></p>  <p><b>Trigger Member Released Position</b></p> |
| <p>wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member</p> | <p>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.</p>                                                                                     |

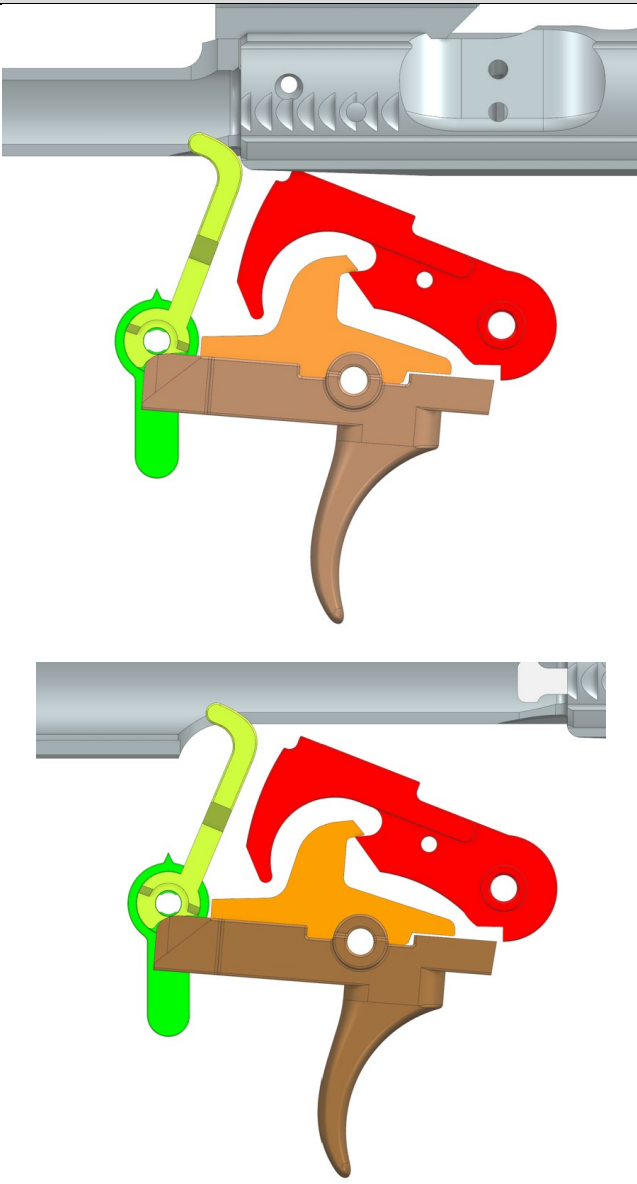
| '159 Patent, Claim 1                                                                                                                       | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                            |  <p>Hammer sear surface</p> <p>Trigger member sear surface</p> <p><b>Trigger Member and Hammer Member Set Position</b></p>                                                                                                                                                         |
| <p>and are out of engagement in the released positions of the hammer and trigger member,</p>                                               | <p>The sear surface of the trigger member (brown) and sear catch surface of the hammer (red) are out of engagement in the released position.</p>  <p>Hammer sear surface</p> <p>Trigger member sear surface</p> <p><b>Trigger Member and Hammer Member Released Positions</b></p> |
| <p>the disconnecter having a hook for engaging the hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a</p> | <p>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).</p>                                                                                                                                                          |

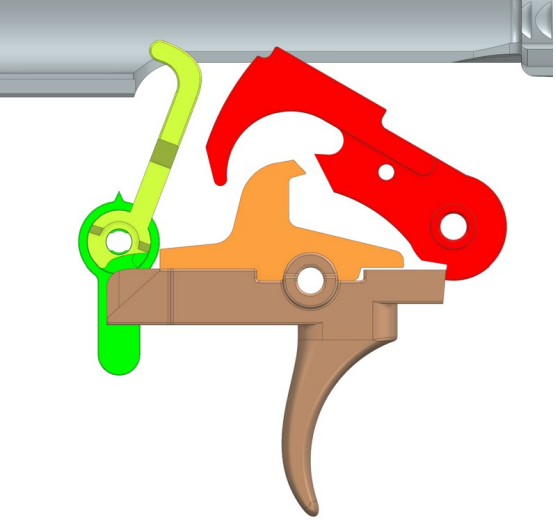
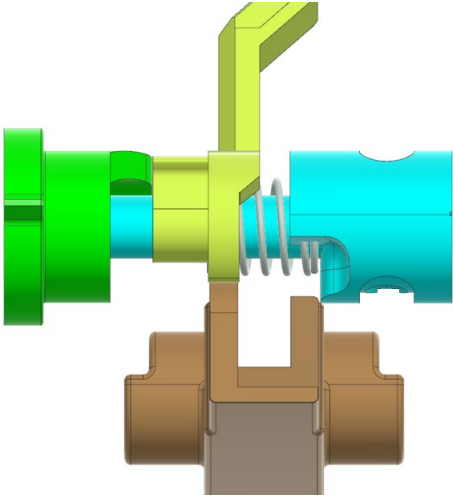
| '159 Patent, Claim 1                                                                            | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| transverse disconnecter pivot axis, and                                                         |  <p style="text-align: center;"><b>Disconnecter Hook Engaged</b></p>                                                                                                                                                                                                                                                                  |
| a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket, | <p>The Atrius Selector has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (<i>See image above depicting Atrius Selector, shown in yellow, in fire control mechanism pocket</i>)</p>  <p style="text-align: center;"><b>Atrius Selector Cam with Lobe and Lever</b></p> |
| the cam being movable between a first position and a second position, in                        | The cam is movable between a first position and a second position.                                                                                                                                                                                                                                                                                                                                                      |

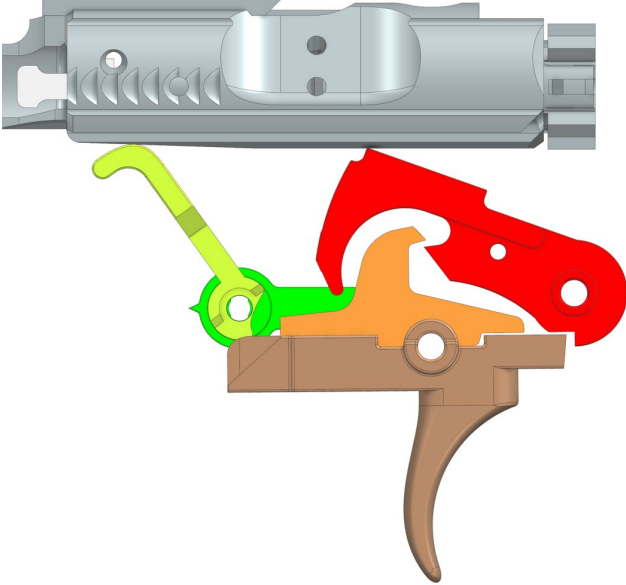
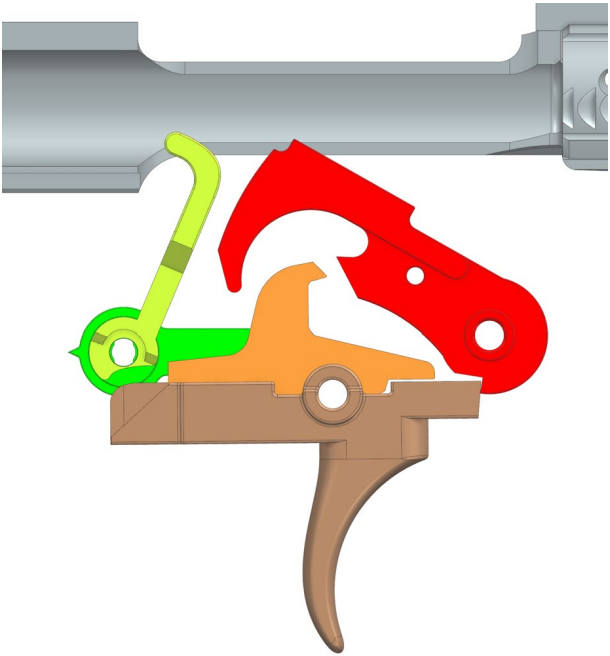


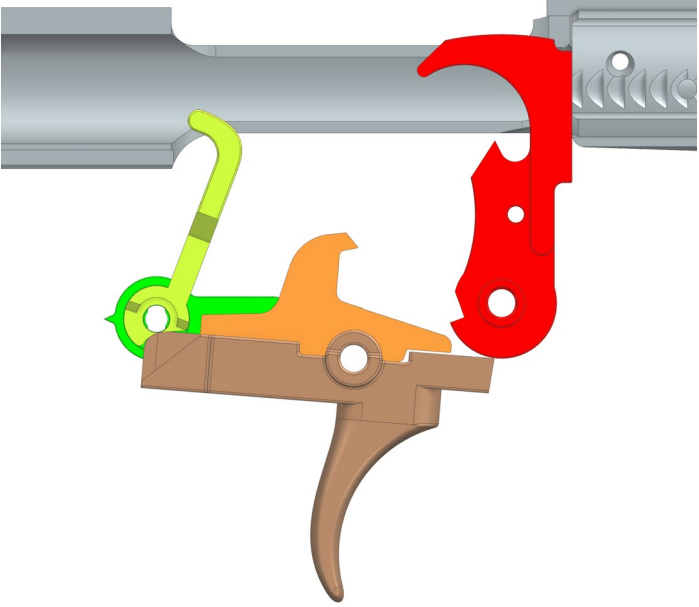
| '159 Patent, Claim 1                                                                       | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>the second position the cam lobe forces the trigger member toward the set position,</p> | <div data-bbox="683 226 1284 751"></div> <p data-bbox="787 772 1182 808"><b>Cam and Lobe First Position</b></p> <p data-bbox="553 877 1409 989">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.</p> <div data-bbox="659 1020 1284 1650"></div> <p data-bbox="771 1671 1198 1707"><b>Cam and Lobe Second Position</b></p> |
| <p>whereupon in the first mode,</p>                                                        | <p>While in the first (standard semi-automatic) mode,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| '159 Patent, Claim 1                                                                                                                       | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnector hook catches the hammer hook,</p> | <div data-bbox="792 226 1156 747"></div> <p data-bbox="704 764 1263 800"><b>Cam in the First (Semi-Automatic) Mode</b></p> <p data-bbox="553 819 1411 926">Rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnector (orange) hook catches the hammer hook.</p> <div data-bbox="678 953 1279 1465"></div> <p data-bbox="704 1497 1263 1533"><b>Disconnector Hook Catches the Hammer</b></p> |
| <p>and thereafter the bolt means moves forward into battery,</p>                                                                           | <p>Thereafter, the bolt means moves forward into battery,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| '159 Patent, Claim 1                                                                                                                                                                                                                 | The Atrius Selector                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                      |  <p data-bbox="683 1430 1284 1465"><b>Pressure on Trigger Member Prevents Reset</b></p>                                                                                                                  |
| <p>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</p> | <p>... 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.</p> |

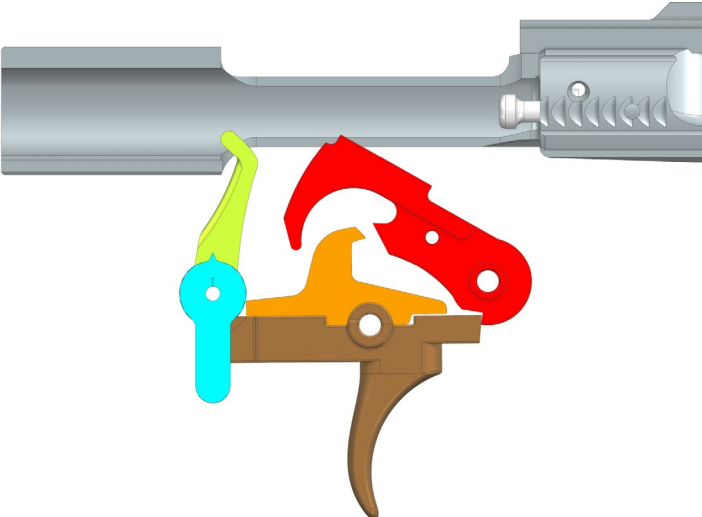
| '159 Patent, Claim 1                                                                                                                             | The Atrius Selector                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| member to fire the firearm, and                                                                                                                  |  <p data-bbox="634 779 1338 814"><b>Reduced Pressure on Trigger Member Allows Reset</b></p>                                                                                                            |
| whereupon in a second mode,                                                                                                                      | <p data-bbox="553 835 1305 871">When in the second (“forced reset” semi-automatic) mode,</p>  <p data-bbox="581 1444 1390 1480"><b>Cam in the Second (“Forced Reset” Semi-Automatic) Mode</b></p>     |
| rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnector hook is prevented from holding the hammer, | <p data-bbox="553 1497 1409 1644">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 disconnector (orange) hook is prevented from holding the hammer hook.</p> |

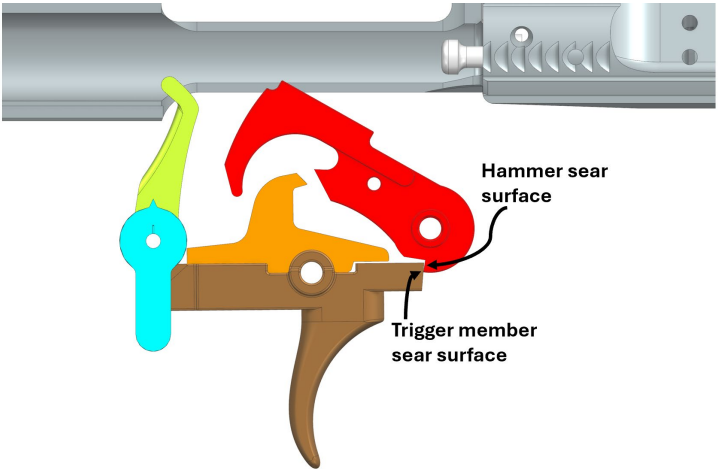
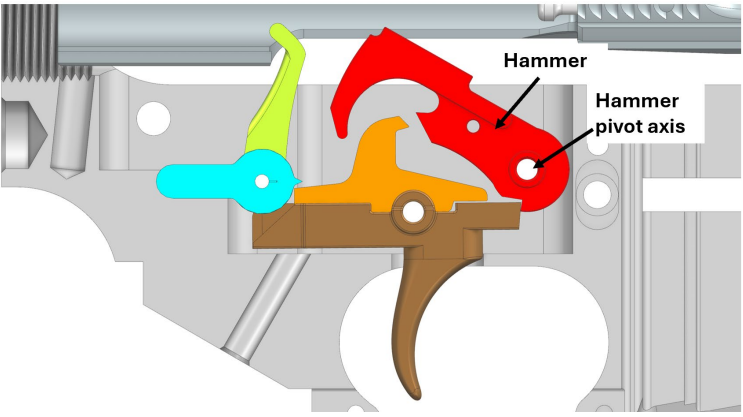
| '159 Patent, Claim 1                                                                                                   | The Atrius Selector                                                                                                                                                                          |
|------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                        |                                                                                                            |
| <p>and thereafter the bolt means moves forward into battery, and thereafter the hammer moves forward into battery,</p> | <p>Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position,</p>  |
| <p>at which time the user can pull the trigger member to fire the firearm.</p>                                         | <p>. . . 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.</p>                                  |

| '159 Patent, Claim 1 | The Atrius Selector                                                                |
|----------------------|------------------------------------------------------------------------------------|
|                      |  |

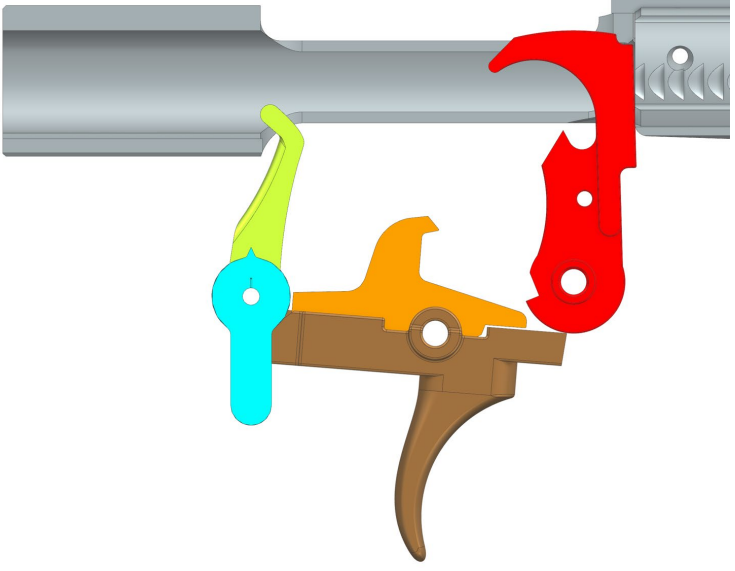
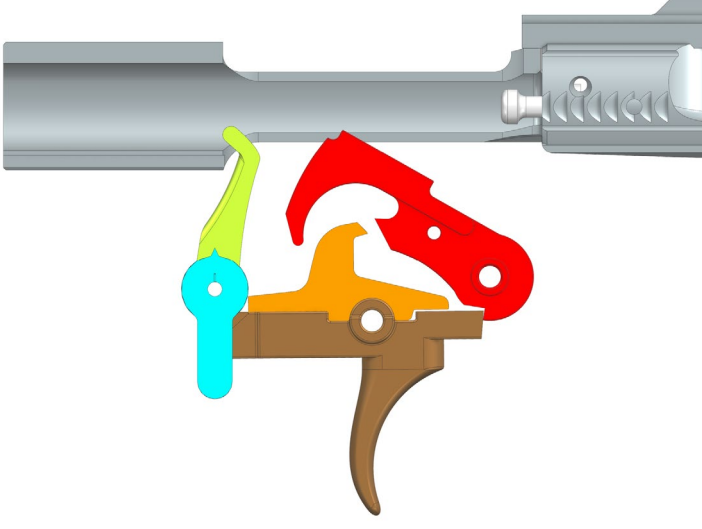
111. An exemplary comparison of the ARC-Fire, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

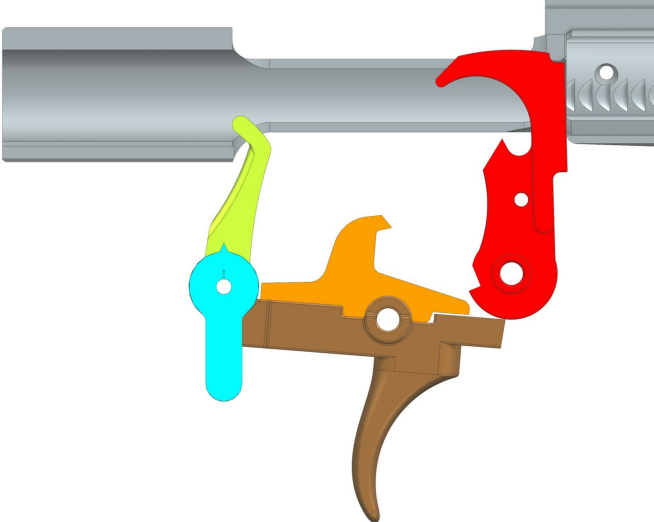
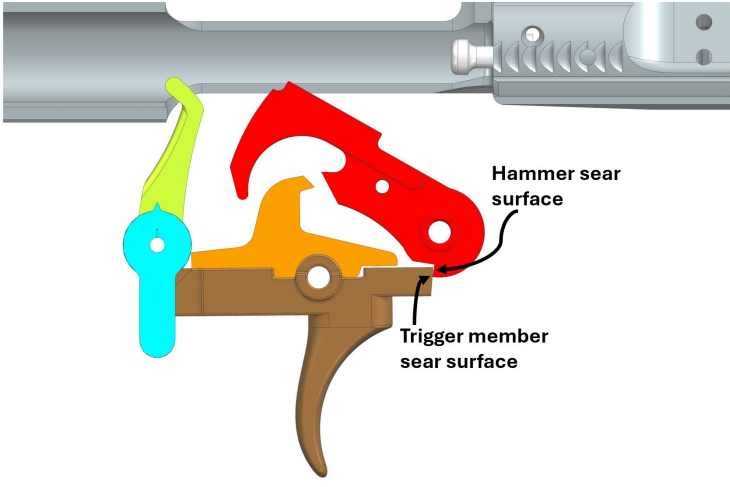
| '159 Patent, Claim 1                                                                                                                                                                                                                                                            | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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:</p> | <p>When installed and used as directed, the ARC-Fire is part of a trigger mechanism that uses a bolt means. With the ARC-Fire installed, the trigger mechanism operates in a standard semi-automatic mode and a “forced reset” semi-automatic mode.</p>  <p><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p> |

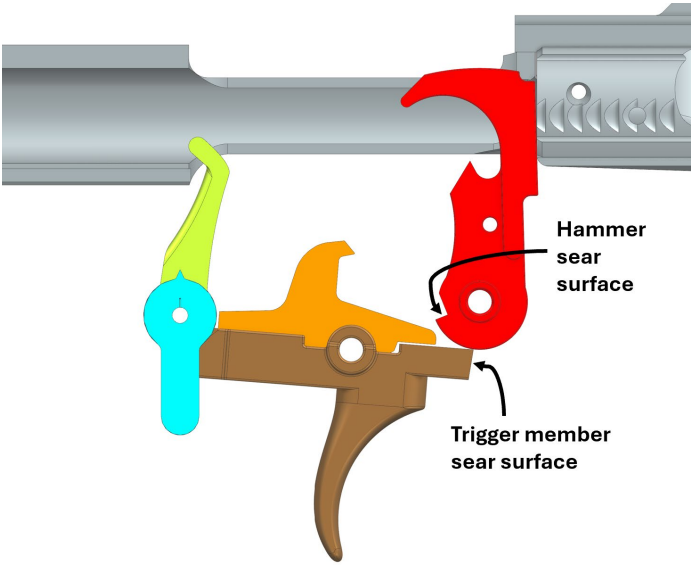
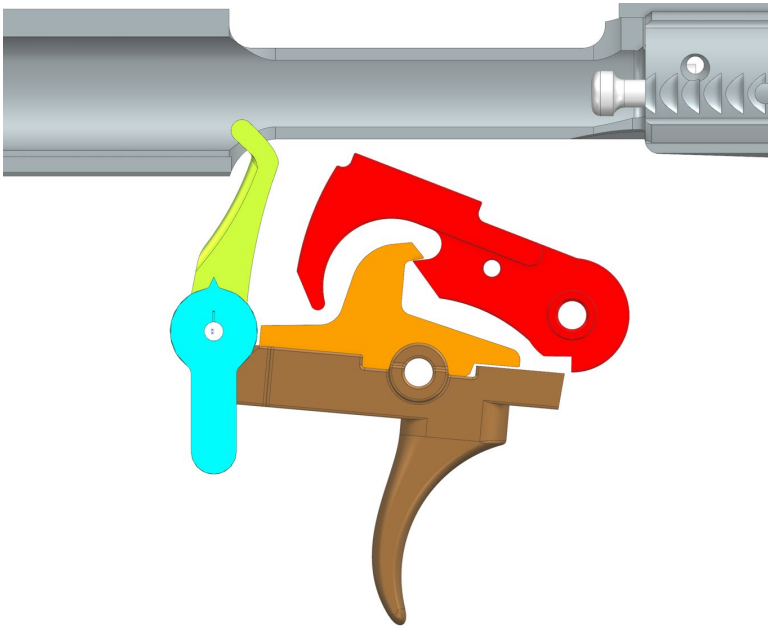
| '159 Patent, Claim 1 | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |  <p data-bbox="915 835 1053 867"><b>ARC-Fire</b></p>  <p data-bbox="842 1430 1127 1461"><b>ARC-Fire (Installed)</b></p> <p data-bbox="599 1482 1373 1514">(Plaintiff-generated renderings of ARC-Fire here and below)</p> |

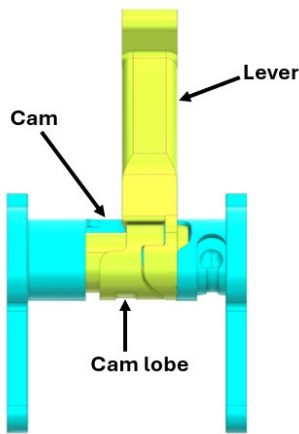
| '159 Patent, Claim 1                                                                                                                                                  | The ARC-Fire                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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</p>               | <p>The ARC-Fire (yellow/blue) 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).</p>  <p style="text-align: center;"><b>ARC-Fire (Installed)</b></p>       |
| <p>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,</p> | <p>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.</p>  <p style="text-align: center;"><b>Hammer Set Position</b></p> |

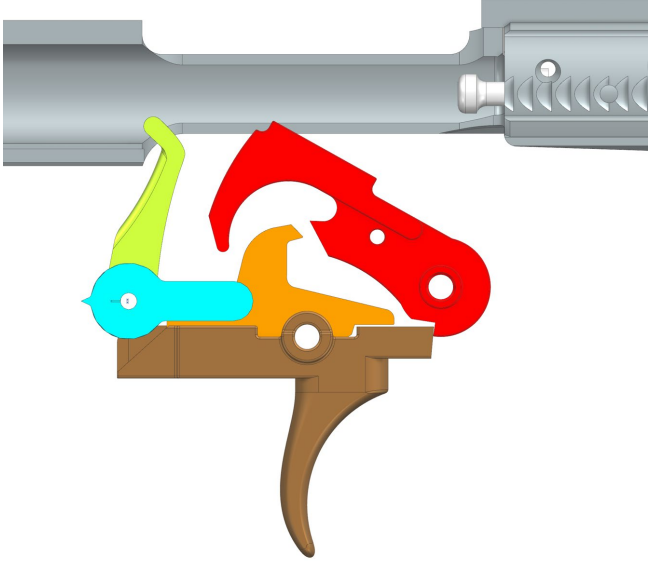
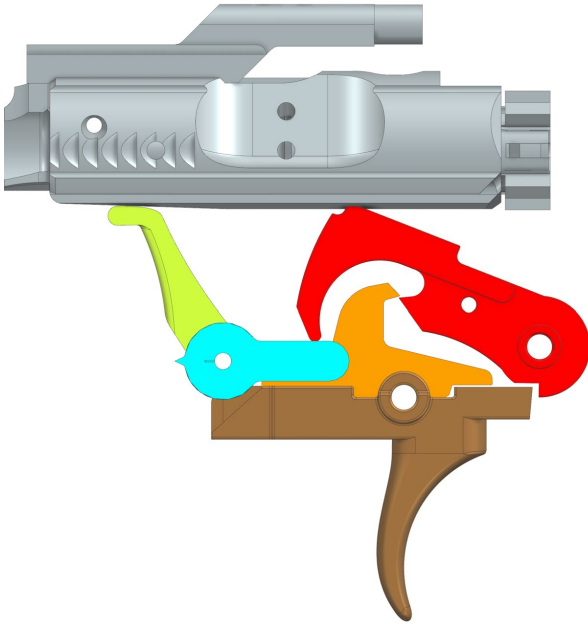


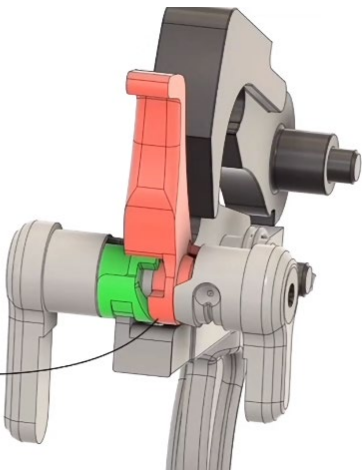
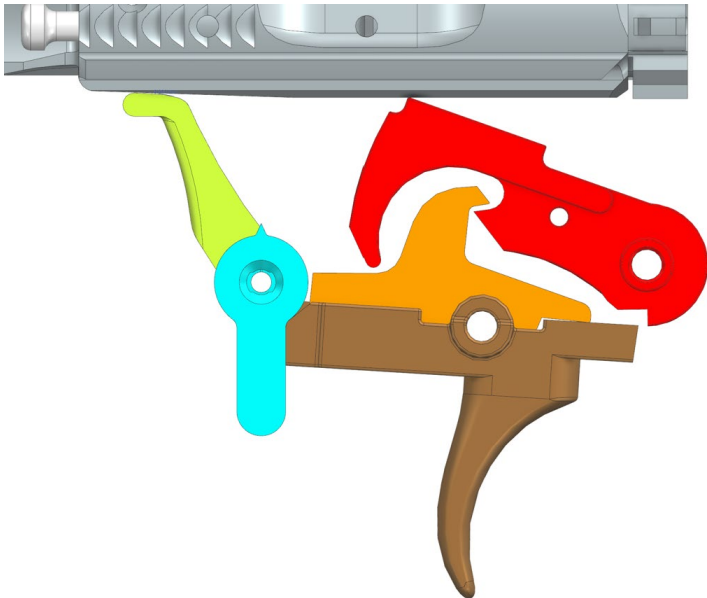
| '159 Patent, Claim 1                                                                                                                                                                                                                     | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                          |  <p data-bbox="803 861 1177 903"><b>Hammer Released Position</b></p>                                                                                                                                                                                                                                                                                                           |
| <p data-bbox="203 924 527 1260">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 released positions.</p> | <p data-bbox="552 924 1404 1060">The ARC-Fire (yellow/blue) 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.</p>  <p data-bbox="787 1764 1193 1806"><b>Trigger Member Set Position</b></p> |

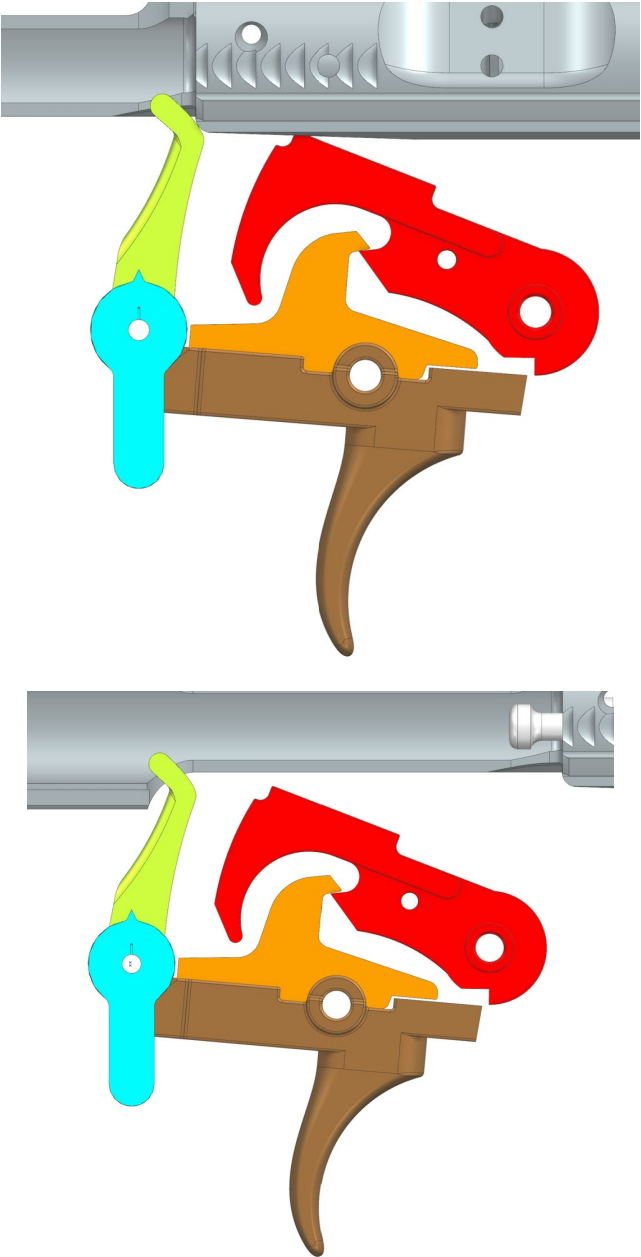
| '159 Patent, Claim 1                                                                                                                    | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| released positions,                                                                                                                     |  <p>The diagram shows a cross-sectional view of a firearm's trigger mechanism. A brown trigger member is in a released position, and a red hammer member is in a set position. A yellow component is visible above the trigger member. The hammer member is positioned such that its sear surface is engaged with the trigger member's sear surface.</p> <p><b>Trigger Member Released Position</b></p>                                                                              |
| wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member | <p>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.</p>  <p>The diagram shows a cross-sectional view of the trigger mechanism in its set position. The brown trigger member and red hammer member are engaged. Labels point to the 'Hammer sear surface' and the 'Trigger member sear surface'.</p> <p><b>Trigger Member and Hammer Member Set Position</b></p> |

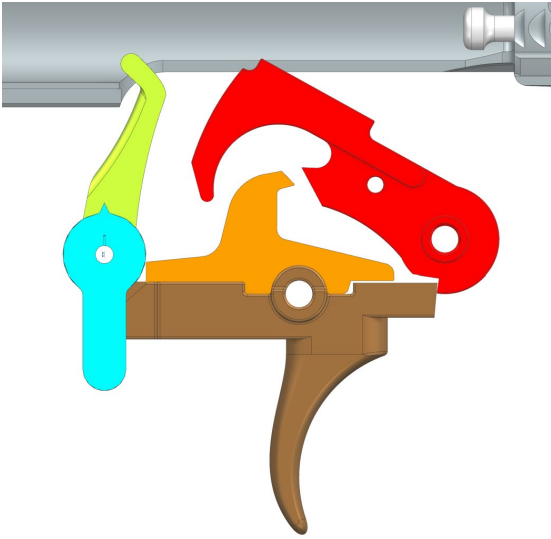
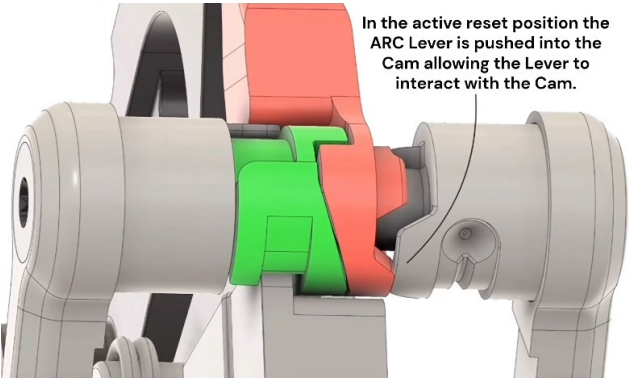
| '159 Patent, Claim 1                                                                                                                                                               | The ARC-Fire                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>and are out of engagement in the released positions of the hammer and trigger member,</p>                                                                                       | <p>The sear surface of the trigger member (brown) and sear catch surface of the hammer (red) are out of engagement in the released position.</p>  <p><b>Trigger Member and Hammer Member Released Positions</b></p>                                    |
| <p>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</p> | <p>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).</p>  <p><b>Disconnecter Hook Engaged</b></p> |

| '159 Patent, Claim 1                                                                                   | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,</p> | <p>The ARC-Fire (yellow/blue) has a cam with a cam lobe and lever (yellow) that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting ARC-Fire, shown in yellow/blue, in fire control mechanism pocket)</p> <div data-bbox="836 409 1133 840"></div> <p data-bbox="732 871 1235 905"><b>ARC-Fire Cam with Lobe and Lever</b></p> |

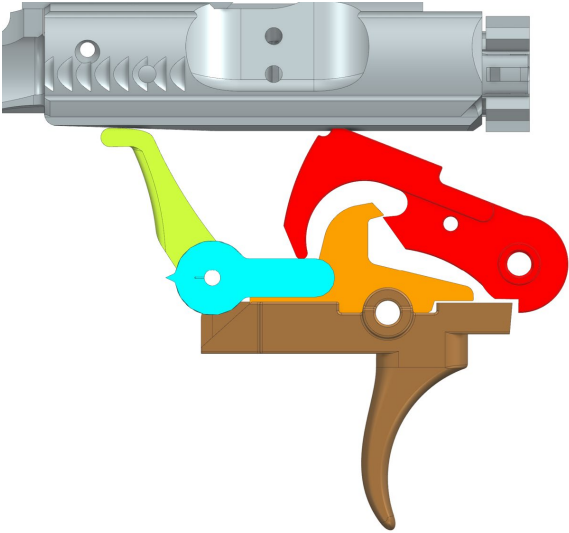
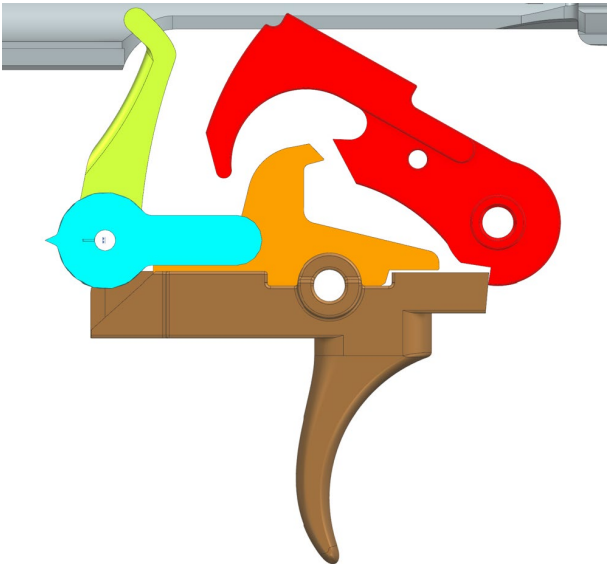
| '159 Patent, Claim 1                                                                                                                                                | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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,</p> | <p>The cam is movable between a first position and a second position.</p>  <p><b>Cam and Lobe First Position</b></p> <p>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.</p>  <p><b>Cam and Lobe Second Position</b></p> |

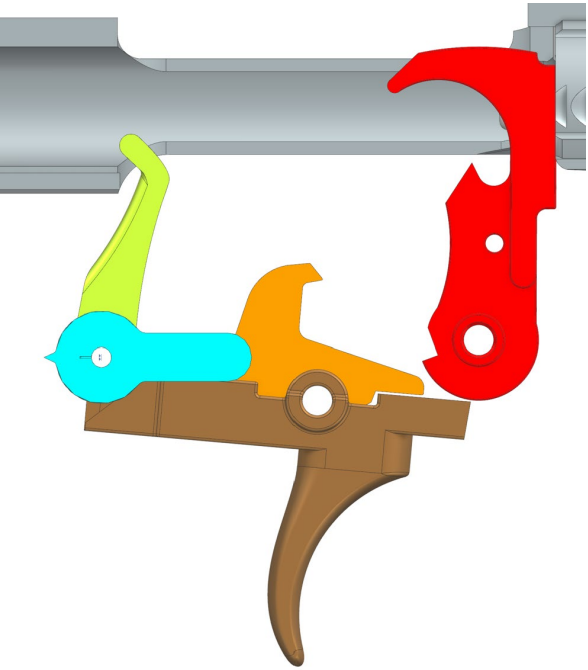
|                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>'159 Patent, Claim 1</b></p> <p>whereupon in the first mode,</p><br><br><br><br><br><br><br><br><br><br><p>rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook,</p> | <p><b>The ARC-Fire</b></p> <p>While in the first (standard semi-automatic) mode,</p> <div data-bbox="664 329 1300 795">  <p>In the SEMI position, the ARC Lever will not engage the Cam as its rotated rearward leaving the Cam in the unlocked position.</p> </div> <p>Rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.</p> <div data-bbox="625 934 1328 1528">  </div> <p style="text-align: center;"><b>Disconnecter Hook Catches the Hammer</b></p> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| '159 Patent, Claim 1                                             | The ARC-Fire                                                                                                                                                                                              |
|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>and thereafter the bolt means moves forward into battery,</p> | <p>Thereafter, the bolt means moves forward into battery,</p>  <p><b>Pressure on Trigger Member Prevents Reset</b></p> |

| '159 Patent, Claim 1                                                                                                                                                                                                                                                 | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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, and</p> | <p>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.</p>  <p><b>Reduced Pressure on Trigger Member Allows Reset</b></p> |
| <p>whereupon in a second mode,</p>                                                                                                                                                                                                                                   | <p>When in the second (“forced reset” semi-automatic) mode,</p>  <p>In the active reset position the ARC Lever is pushed into the Cam allowing the Lever to interact with the Cam.</p>                                                                                                                                                               |



| '159 Patent, Claim 1                                                                                                                                    | The ARC-Fire                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook is prevented from holding the hammer,</p> | <p>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.</p>  |
| <p>and thereafter the bolt means moves forward into battery,</p>                                                                                        | <p>Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position,</p>                                                                                                                                                 |

| '159 Patent, Claim 1                                                           | The ARC-Fire                                                                                                                                                                                                                                    |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>at which time the user can pull the trigger member to fire the firearm.</p> | <p>. . . 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.</p>  |

112. 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, Atrius Selector, and ARC-Fire while selling products.

113. 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.

114. 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, Atrius Selector, and ARC-Fire, 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.

115. 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.

116. 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.

117. 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.

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

119. 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.

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

121. 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 '223 PATENT**

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

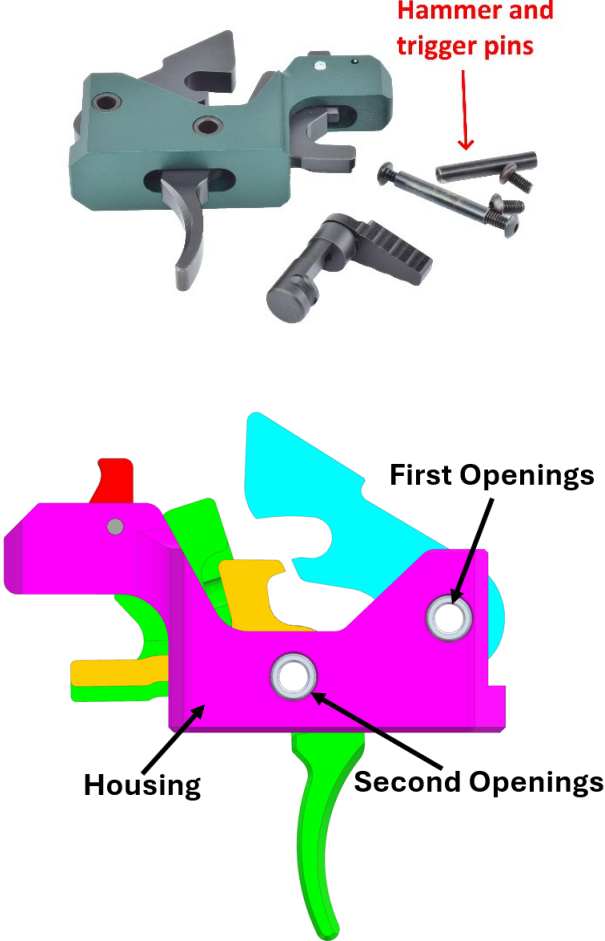
123. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '223 patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents, by among other things, making, using, 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.

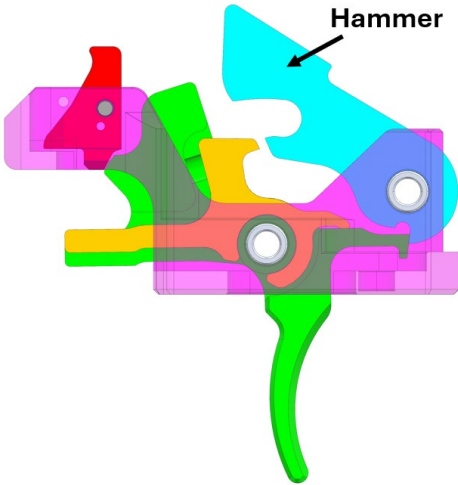
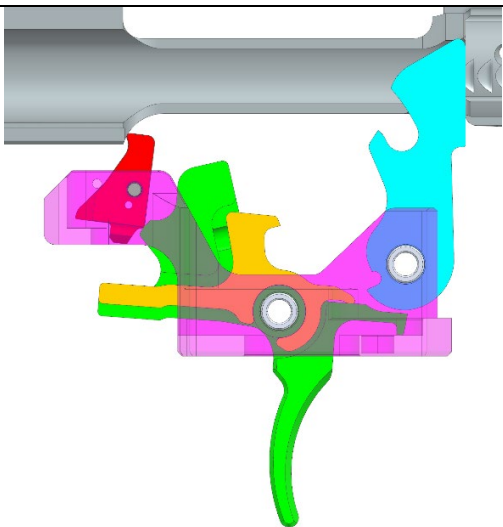
124. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '223 patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents.

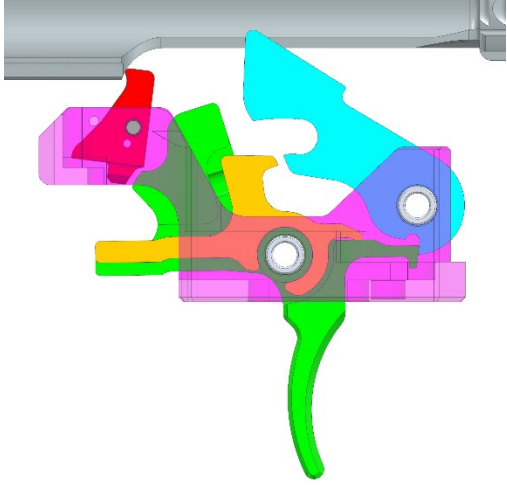
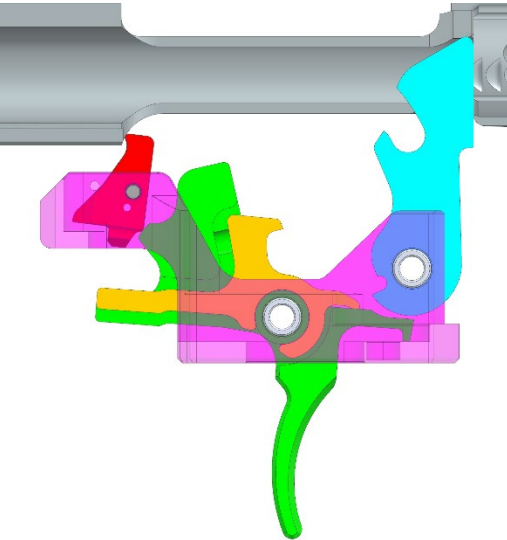
125. An exemplary comparison of the Disruptor, when assembled and used as intended, with claim 4 of the '223 Patent is illustrated in the chart below:

| '223 Patent, Claim 4                                                                                                        | The Disruptor                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4. For a firearm having a receiver with a fire control mechanism pocket, assembly pin openings in side walls of the pocket, | The Disruptor is for an AR-pattern firearm, which has a lower receiver with a fire control pocket and assembly pin openings in side walls of the pocket. |

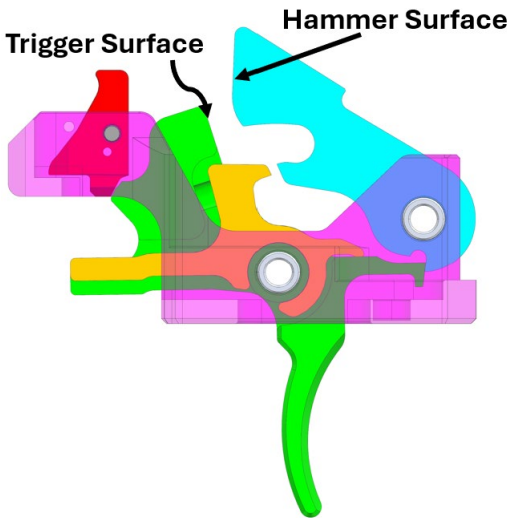
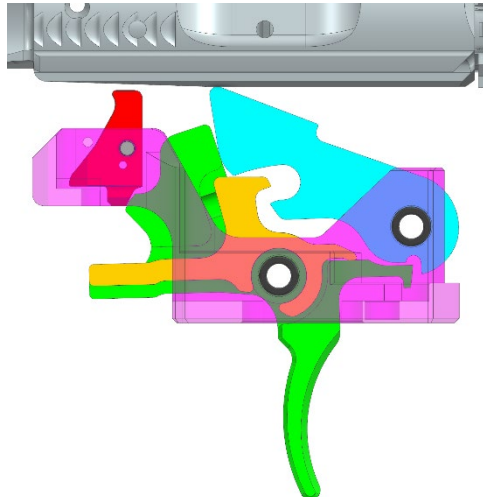
| '223 Patent, Claim 4                                                                                                       | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>and a bolt carrier that reciprocates and pivotally displaces a hammer when cycled, a trigger mechanism, comprising:</p> | <div data-bbox="917 247 1218 598" data-label="Image"> </div> <div data-bbox="800 632 1360 703" data-label="Text"> <p><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p> </div> <div data-bbox="764 758 1182 787" data-label="Caption"> <p><b>Fire Control Mechanism Pocket</b></p> </div> <div data-bbox="868 724 1380 1066" data-label="Image"> </div> <p>An AR-pattern firearm has a bolt carrier that reciprocates and pivotally displaces a hammer when cycled.</p> <div data-bbox="833 1289 987 1318" data-label="Caption"> <p><b>Bolt Carrier</b></p> </div> <div data-bbox="852 1234 1323 1612" data-label="Image"> </div> |
| <p>a housing having transversely aligned pairs of openings for receiving hammer and trigger assembly pins;</p>             | <p>The Disruptor includes a housing with transversely aligned pairs of openings for receiving hammer and trigger assembly pins.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

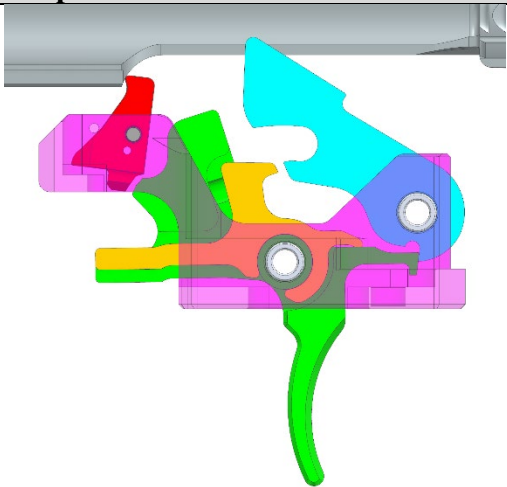
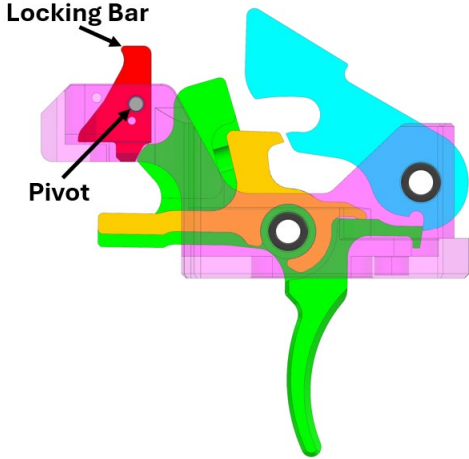
| '223 Patent, Claim 4                                                                  | The Disruptor                                                                                                                                                                              |
|---------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                       |  <p data-bbox="776 1197 1388 1270">(Plaintiff-generated renderings of the Disruptor here and below)</p> |
| 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.                                                                      |

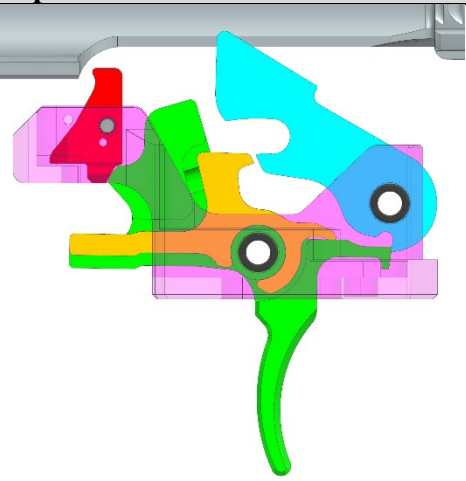
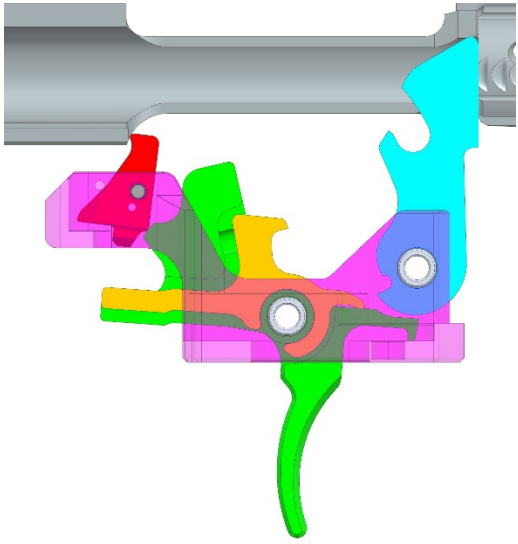
| '223 Patent, Claim 4                                                                    | The Disruptor                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| between set and                                                                         |  <p style="text-align: right;">Hammer</p> <p style="text-align: center;"><b>Set Position</b></p> |
| released positions;                                                                     |  <p style="text-align: center;"><b>Released Position</b></p>                                    |
| 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.                                                              |

| '223 Patent, Claim 4                                                                                                                       | The Disruptor                                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| between set                                                                                                                                |  <p data-bbox="1003 730 1159 762"><b>Set Position</b></p>        |
| and released positions,                                                                                                                    |  <p data-bbox="963 1371 1203 1402"><b>Released Position</b></p> |
| the trigger member having a surface positioned to be contacted by the hammer when the hammer is displaced by the bolt carrier when cycled, | The trigger member (green) has a surface positioned to be contacted by a surface of the hammer (blue).                                             |



| '223 Patent, Claim 4                                                            | The Disruptor                                                                                                                                                                                          |
|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                 |  <p>Trigger Surface</p> <p>Hammer Surface</p>                                                                        |
| <p>the contact causing the trigger member to be forced to the set position;</p> | <p>The hammer (blue) pivots rearward causing the trigger (green) to be mechanically moved to the set position.</p>  |

| '223 Patent, Claim 4                                                                                                                            | The Disruptor                                                                                                                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                 |                                                                                                                            |
| a locking bar pivotally mounted in the housing                                                                                                  | <p data-bbox="743 730 1409 804">The Disruptor includes a locking bar (red) that is pivotally mounted in the housing.</p>  |
| and spring biased toward a first position in which the locking bar mechanically blocks the trigger member from moving to the released position, | <p data-bbox="743 1297 1409 1444">The locking bar is spring biased toward a first position in which the locking bar mechanically blocks the trigger member from moving to the released position.</p>         |

| '223 Patent, Claim 4                                                                                                                                                                                                                           | The Disruptor                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                |  <p data-bbox="841 730 1326 766"><b>First position mechanically blocked</b></p>                                                                                                                                                                                                                         |
| <p>and movable against the spring bias to a second position when contacted by the bolt carrier reaching a substantially in-battery position</p> <p>in which the trigger member can be moved by an external force to the released position.</p> | <p>The locking bar is movable against the spring bias to a second position when contacted by the bolt carrier reaching a substantially in-battery position.</p> <p>In this position, the trigger member can be moved by an external force (pull by the trigger finger) to the released position.</p>  |

126. 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.

127. 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.

128. 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 mechanically reset a trigger mechanism and infringe the '223 Patent.

129. 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.

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

131. By their 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.

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

133. 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.

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

135. 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.

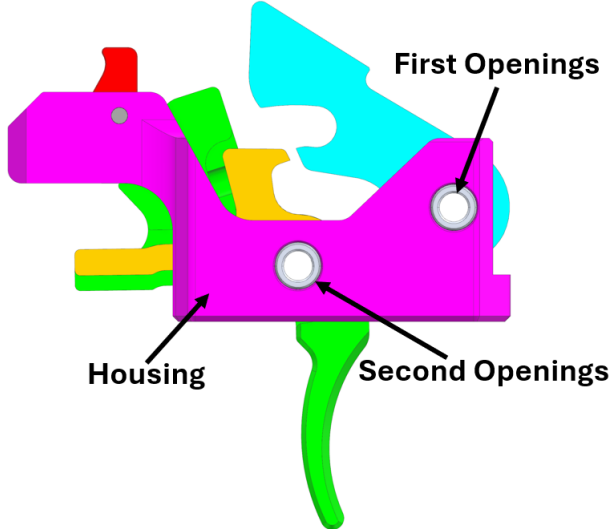
#### **COUNT VI — INFRINGEMENT OF THE '003 PATENT**

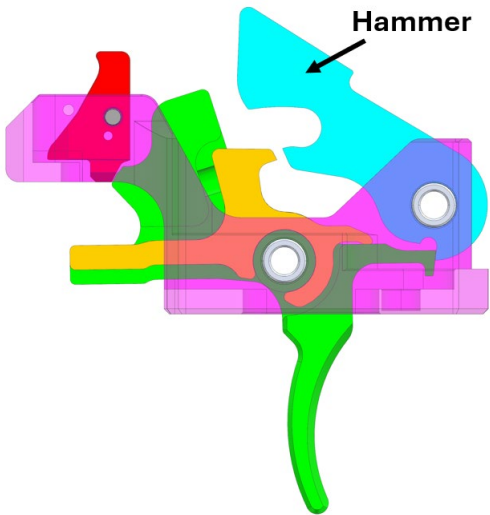
136. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

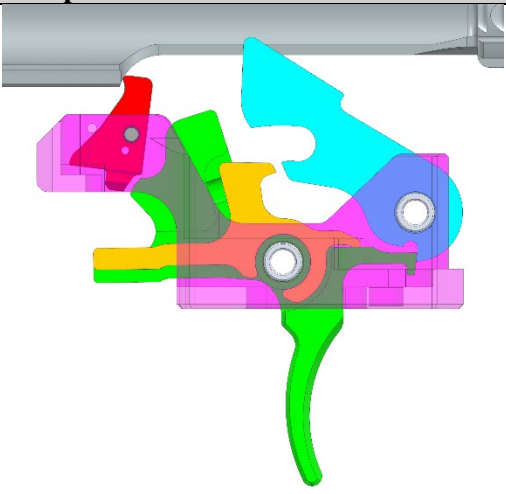
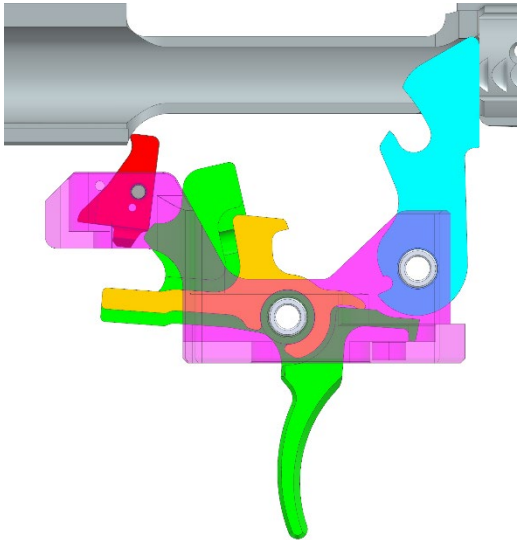
137. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '003 patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents, by among other things, making, using, 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.

138. 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.

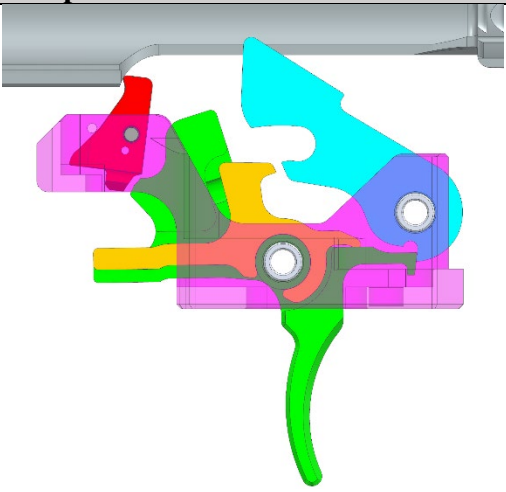
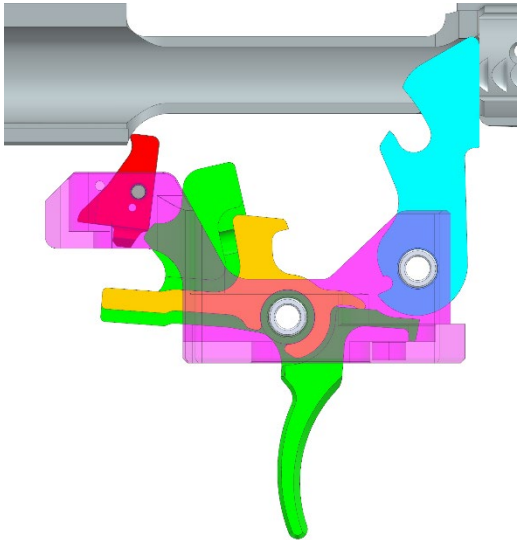
139. An exemplary comparison of the Disruptor, when assembled and used as intended, with claim 4 of the '003 patent is illustrated in the chart below:

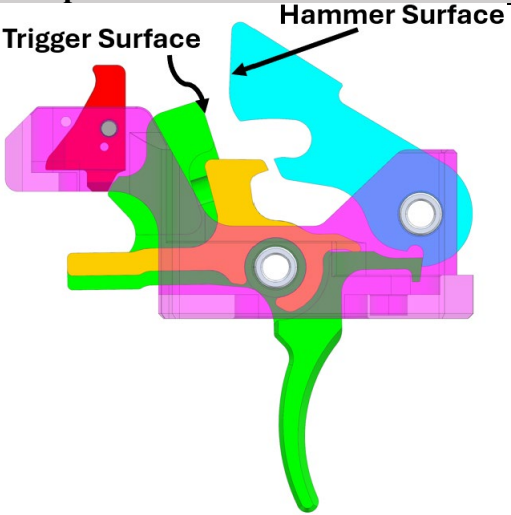
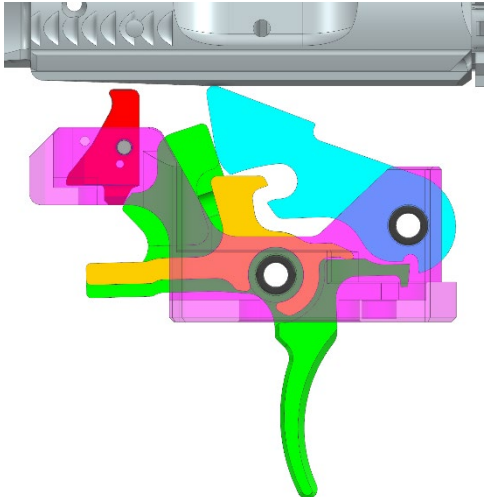
| '003 Patent, Claim 4                                                                                                                                                             | The Disruptor                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4. A firearm trigger mechanism comprising:                                                                                                                                       | <p>The Disruptor is a firearm trigger mechanism.</p>  <p><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p>                                                       |
| 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, | <p>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.</p>  <p>The Disruptor is sold with hammer and trigger pins.</p> |

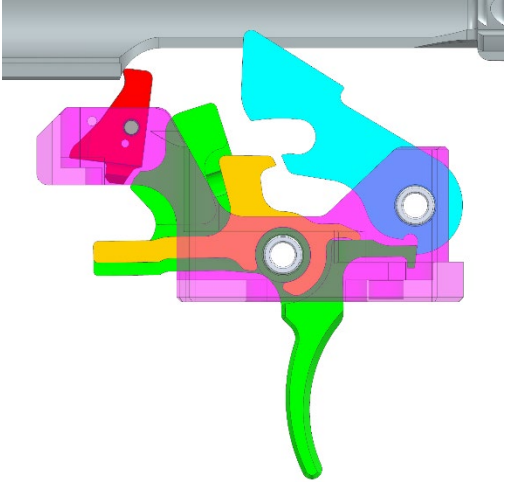
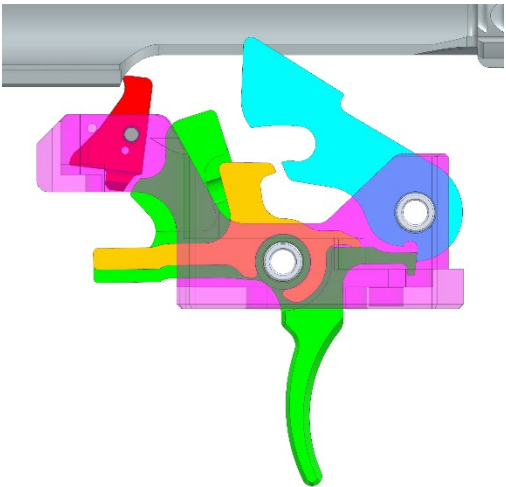
| '003 Patent, Claim 4                                                                                                               | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                    |  <p>Hammer and trigger pins</p>                                                                                                                                                                                                                                                                                                                                        |
| <p>a hammer having a sear catch and a hook for engaging a disconnecter and mounted in said housing to pivot on said hammer pin</p> | <p>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.</p>  <p>Hammer</p> <p>(Plaintiff-generated renderings of the Disruptor here and below)</p> |

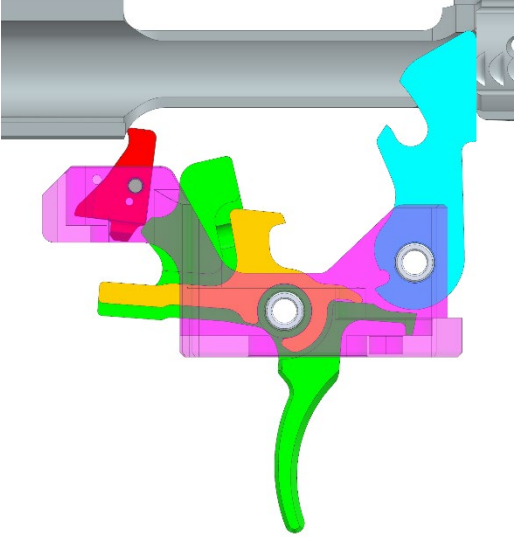
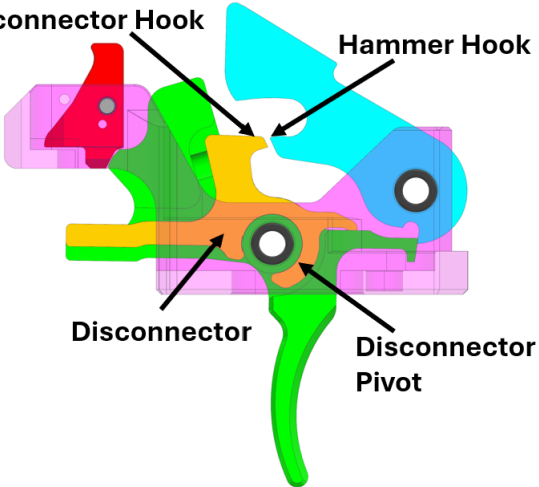
| '003 Patent, Claim 4                                                                                   | The Disruptor                                                                                                                                      |
|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| between set and                                                                                        |  <p data-bbox="1008 730 1175 762"><b>Set Position</b></p>        |
| released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier, |  <p data-bbox="971 1373 1211 1404"><b>Released Position</b></p> |
| 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                   |

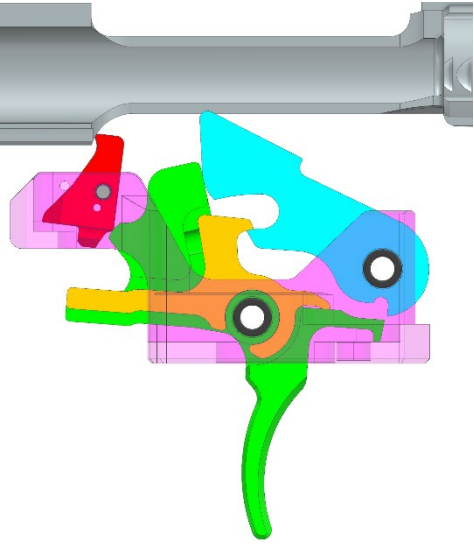
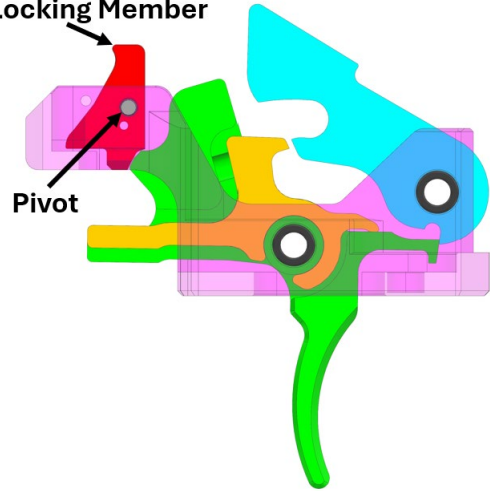


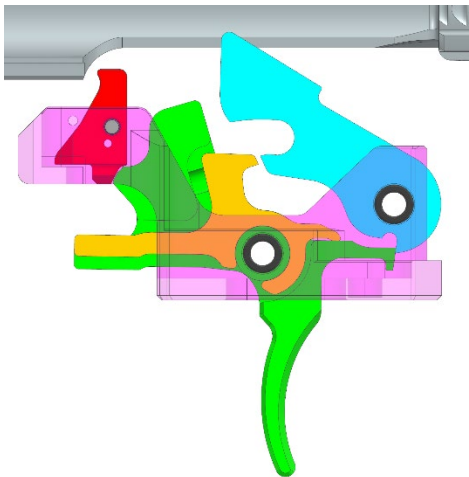
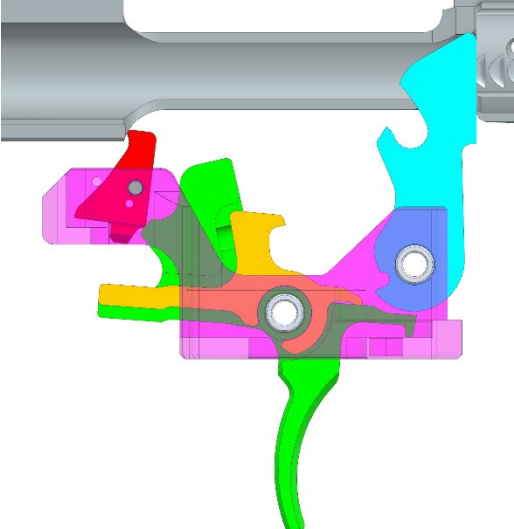
| '003 Patent, Claim 4                                                                                                       | The Disruptor                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| between set                                                                                                                |  <p data-bbox="1008 730 1174 762"><b>Set Position</b></p>                                                                                                                                                    |
| and released positions,<br><br>said trigger member having a surface positioned to be contacted by a surface of said hammer |  <p data-bbox="971 1373 1211 1404"><b>Released Position</b></p> <p data-bbox="764 1428 1344 1533">The trigger member (green) has a surface positioned to be contacted by a surface of the hammer (blue)</p> |

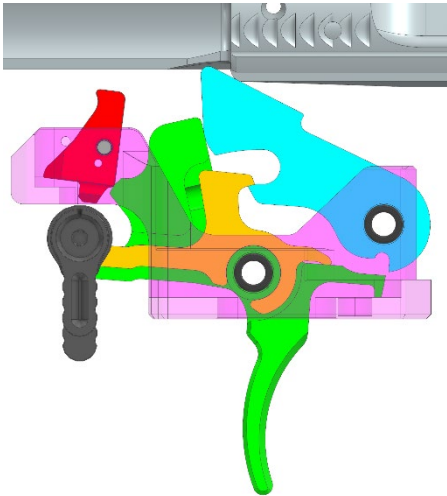
| '003 Patent, Claim 4                                                                                           | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                |  <p>The diagram shows a mechanical assembly with several colored components: a red trigger member, a green trigger surface, a yellow hammer, and a blue hammer surface. The hammer is in a forward position, and the trigger is in a retracted position. Labels with arrows point to the 'Trigger Surface' and 'Hammer Surface'.</p> |
| <p>during rearward pivoting of said hammer to cause said trigger member to be forced to said set position,</p> | <p>The hammer (blue) pivots rearward causing the trigger (green) to be mechanically moved to the set position.</p>  <p>The diagram shows the same mechanical assembly as above, but the hammer (blue) has pivoted rearward, and the trigger (green) has moved to a set position. A grey component is visible above the trigger.</p> |

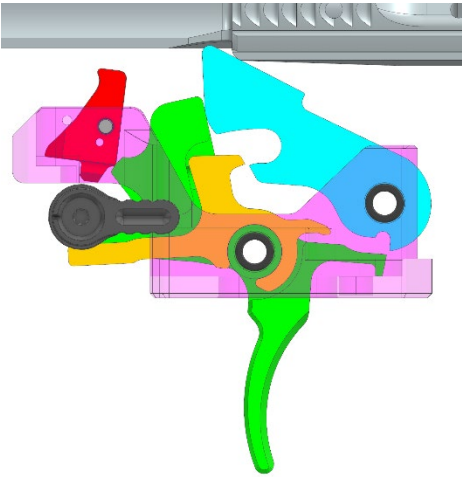
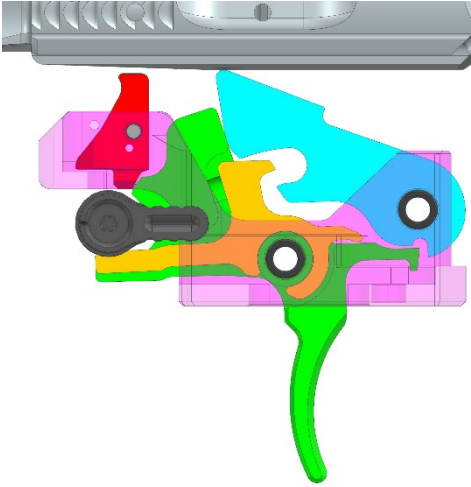
| '003 Patent, Claim 4                                                                                              | The Disruptor                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                   |                                                                                             |
| <p>wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member</p> | <p>The sear and sear catch are engaged in the set position</p>  <p><b>Set Position</b></p> |
| <p>and are out of engagement in said released positions of said hammer and trigger member,</p>                    | <p>The sear and sear catch are out of engagement in the released position</p>                                                                                                 |

| '003 Patent, Claim 4                                                                                                                                                                           | The Disruptor                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                |  <p data-bbox="971 787 1209 819"><b>Released Position</b></p>                                                                                                                                                                                                 |
| <p data-bbox="203 846 625 919">a disconnector having a hook for engaging said hammer</p> <p data-bbox="203 1491 722 1560">and mounted in said housing to pivot on said trigger member pin,</p> | <p data-bbox="763 846 1404 919">The Disruptor has a disconnector (orange) that has a hook for engaging the hammer (blue) hook</p>  <p data-bbox="763 1491 1404 1560">The disconnect is mounted in the housing to pivot on the trigger (green) member pin</p> |

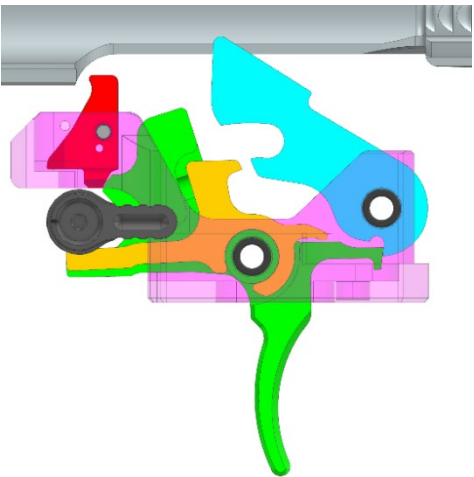
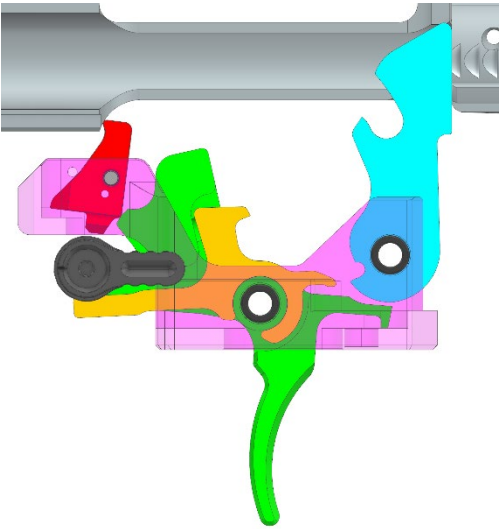
| '003 Patent, Claim 4                                                                                                                                                           | The Disruptor                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                |                                                                                                                                   |
| <p>a locking member mounted in said housing to pivot on a transverse locking member pin,</p>                                                                                   | <p>The Disruptor has a locking member (red) that is mounted in the housing and it pivots on a transverse locking member pin</p>  |
| <p>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</p> | <p>When the locking bar (red) is in the first position, the locking member blocks the trigger (green) from being pulled</p>                                                                                         |

| '003 Patent, Claim 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  <p data-bbox="844 745 1339 777"><b>First Position Mechanically Blocked</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p data-bbox="203 804 743 982">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,</p> <p data-bbox="203 1591 743 1843">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</p> | <p data-bbox="763 804 1364 909">When the locking bar (red) is in the second position, it does not prevent the trigger (green) from being pulled</p>  <p data-bbox="795 1533 1388 1564"><b>Second Position Not Mechanically Blocked</b></p> <p data-bbox="763 1591 1421 1801">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.</p> |

| '003 Patent, Claim 4                                                                                                                                                                                                                                                                                                                                                                                                                                            | The Disruptor                                                                                                                                                                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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,</p>                                                                                                                                                                                                                                                                      | <p>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.</p>                                                     |
| <p>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,</p> <p>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</p> | <p>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</p>  <p style="text-align: center;"><b>Standard Semi-automatic Position</b></p> |
| <p>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,</p>                                                                                                                                                                                                                                                     | <p>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 mechanically moved to the set position.</p>                                                                                                                     |

| '003 Patent, Claim 4                                                                   | The Disruptor                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                        |  <p data-bbox="805 737 1380 810"><b>Trigger Pulled to the Rear, Hammer First Touches the Trigger</b></p>  <p data-bbox="776 1325 1409 1398"><b>Hammer has now Caused the Trigger to Move to the Reset Position</b></p> |
| 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                                                                                                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                    |  <p data-bbox="1008 737 1175 768"><b>Set Position</b></p>                                                                                                             |
| <p>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</p> | <p>When the bolt carrier reaches a substantially in-battery position the user can pull the trigger (green) without manually releasing pressure off the trigger</p>  |

140. 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.

141. 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.

142. 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 mechanically reset a trigger mechanism and infringe the '003 Patent.

143. 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.

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

145. By their 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.

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

147. 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.

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

149. 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.

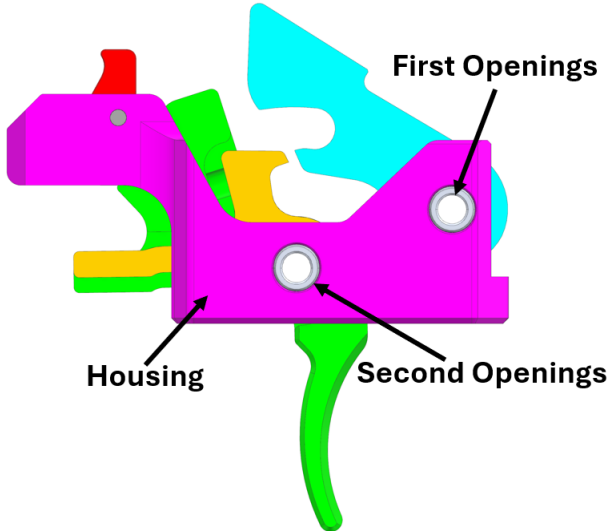
#### **COUNT VII — INFRINGEMENT OF THE '336 PATENT**

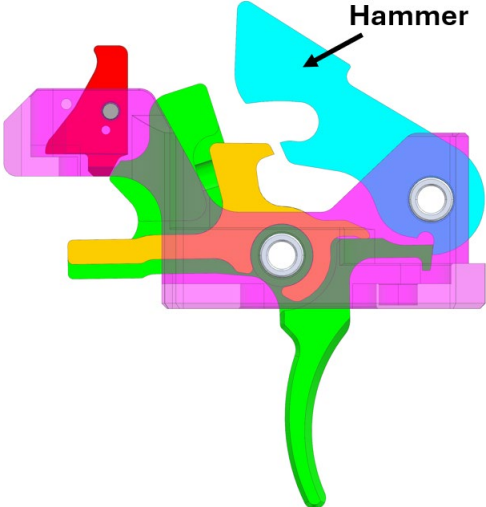
150. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

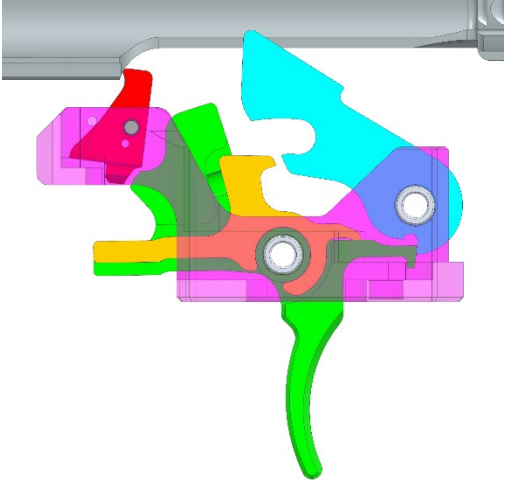
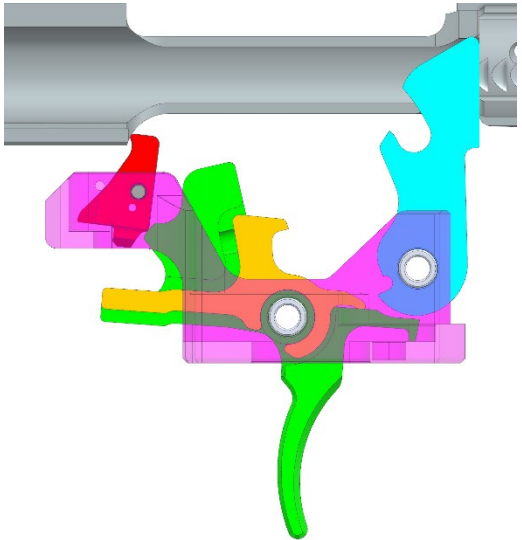
151. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '336 patent, including but not limited to claim 3, literally and/or under the doctrine of equivalents, by among other things, making, using, 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.

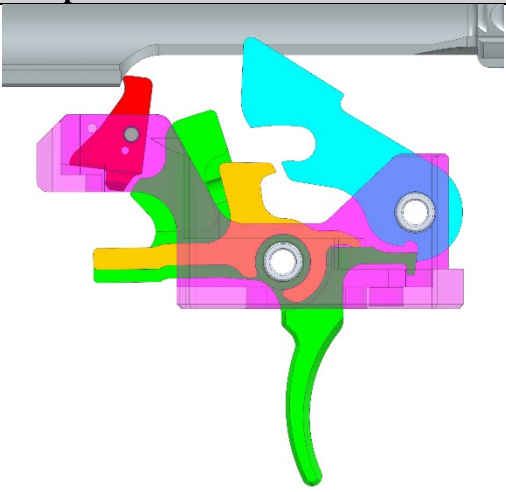
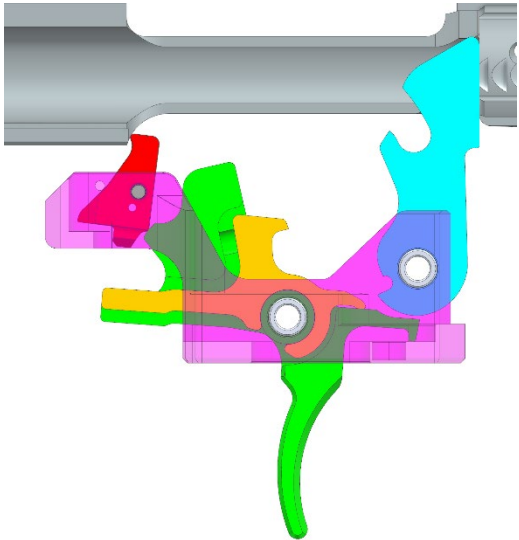
152. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '336 patent, including but not limited to claim 3, literally and/or under the doctrine of equivalents.

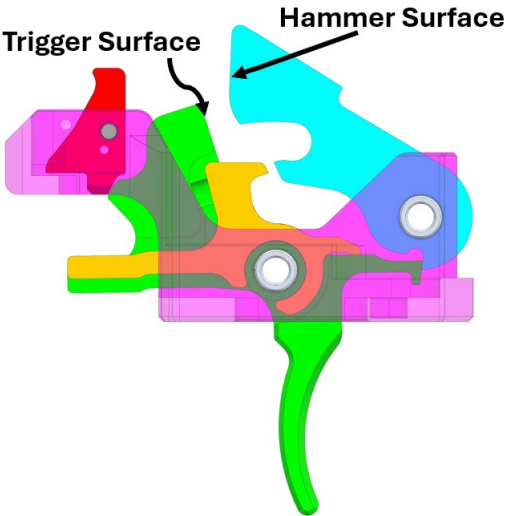
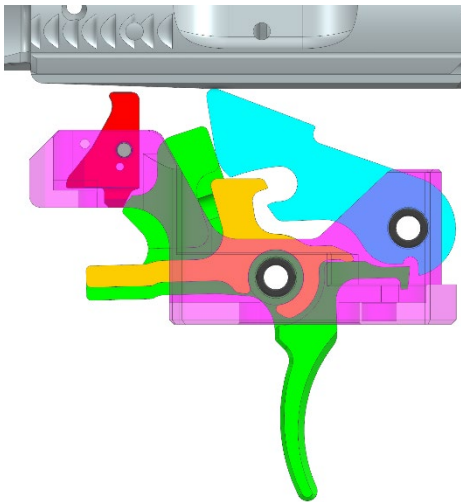
153. An exemplary comparison of the Disruptor, when assembled and used as intended, with claim 3 of the '336 patent is illustrated in the chart below:

| '336 Patent, Claim 3                                                                                                                                                                    | The Disruptor                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>3. A firearm trigger mechanism comprising:</p>                                                                                                                                       | <p>The Disruptor is a firearm trigger mechanism.</p>  <p><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p>                                                       |
| <p>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,</p> | <p>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.</p>  <p>The Infringing Device is sold with hammer and trigger pins.</p> |

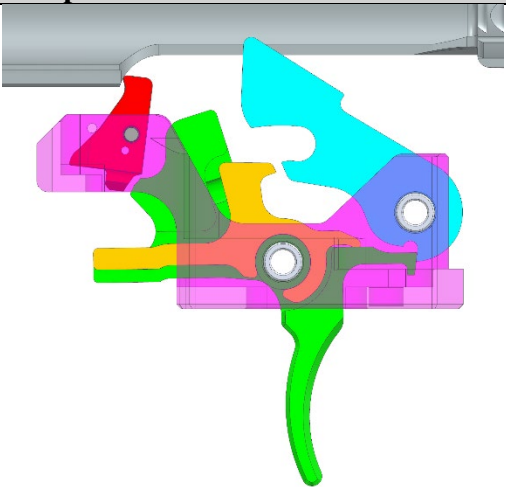
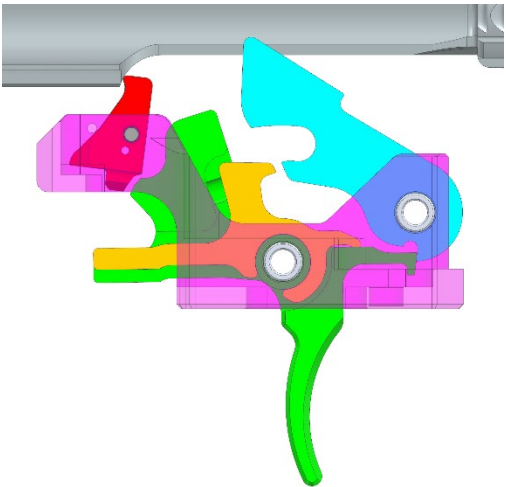
| '336 Patent, Claim 3                                                                                                               | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                    |  <p>Hammer and trigger pins</p>                                                                                                                                                                                                                                                                                                                                        |
| <p>a hammer having a sear catch and a hook for engaging a disconnecter and mounted in said housing to pivot on said hammer pin</p> | <p>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.</p>  <p>Hammer</p> <p>(Plaintiff-generated renderings of the Disruptor here and below)</p> |

| '336 Patent, Claim 3                                                                                   | The Disruptor                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| between set and                                                                                        |  <p style="text-align: center;"><b>Set Position</b></p>       |
| released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier, |  <p style="text-align: center;"><b>Released Position</b></p> |
| 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                |

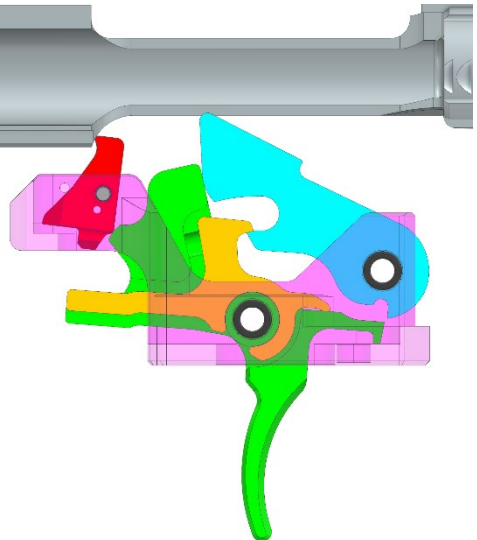
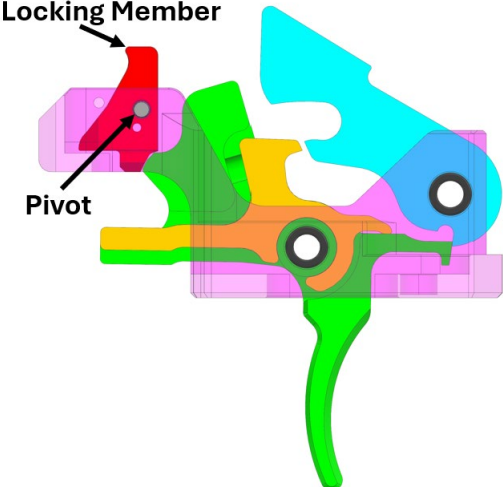
| '336 Patent, Claim 3                                                                                                       | The Disruptor                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| between set                                                                                                                |  <p data-bbox="1008 730 1174 762"><b>Set Position</b></p>                                                                                                                                                     |
| and released positions,<br><br>said trigger member having a surface positioned to be contacted by a surface of said hammer |  <p data-bbox="971 1373 1211 1404"><b>Released Position</b></p> <p data-bbox="764 1428 1344 1533">The trigger member (green) has a surface positioned to be contacted by a surface of the hammer (blue).</p> |

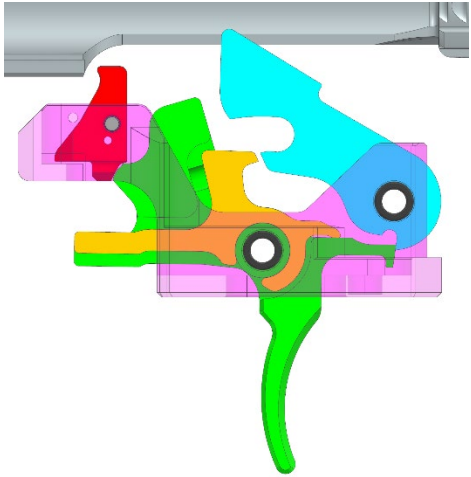
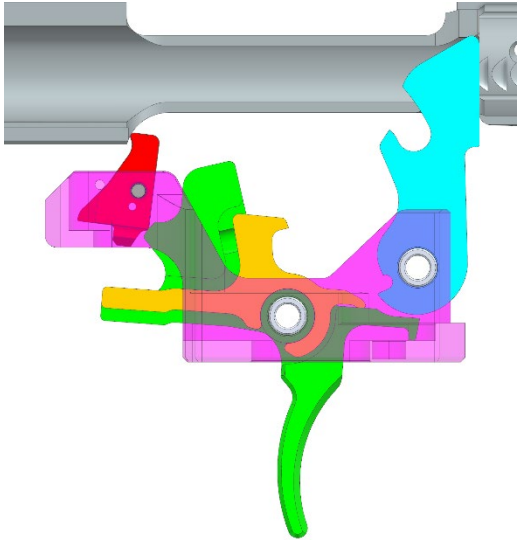
| '336 Patent, Claim 3                                                                                    | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                         |  <p data-bbox="841 275 1344 787">A cross-sectional diagram of a mechanical assembly. A red trigger member is positioned on the left, with a green trigger surface. A blue hammer member is on the right, with a cyan hammer surface. The hammer is pivoted rearward. A yellow and orange component is in the center. A green trigger member is at the bottom. A pink base is at the bottom. A black arrow points from the text 'Trigger Surface' to the green trigger surface. Another black arrow points from the text 'Hammer Surface' to the cyan hammer surface.</p>                                                               |
| during rearward pivoting of said hammer to cause said trigger member to be forced to said set position, | <p data-bbox="751 804 1425 924">The hammer (blue) pivots rearward causing the trigger (green) to be mechanically moved to the set position</p>  <p data-bbox="860 997 1318 1495">A cross-sectional diagram of the same mechanical assembly as above, but in a different state. The blue hammer member is now pivoted forward, and the green trigger member is now in a different position, closer to the center. A grey component is visible at the top. A black arrow points from the text 'Trigger Surface' to the green trigger surface. Another black arrow points from the text 'Hammer Surface' to the cyan hammer surface.</p> |

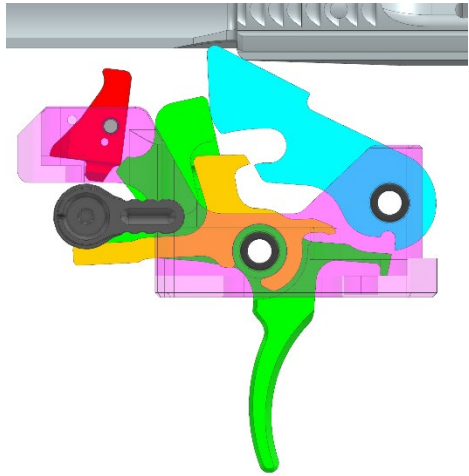


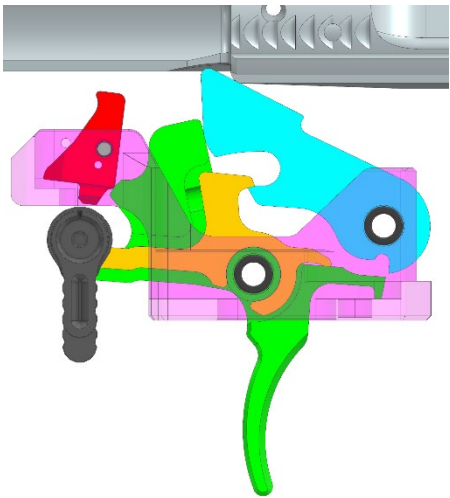
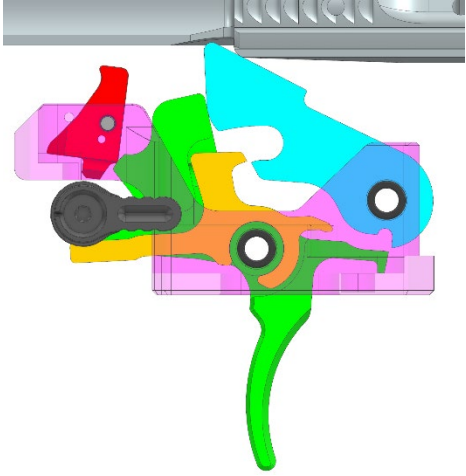
| '336 Patent, Claim 3                                                                                                                                                                                             | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                  |  A cross-sectional diagram of a mechanical disruptor. A grey hammer is at the top. Below it, a red sear is engaged with a green sear catch. The sear catch is part of a larger assembly that includes a yellow trigger member and a blue/purple base. A green trigger finger extends downwards from the trigger member. |
| <p>wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member</p> <p>and are out of engagement in said released positions of said hammer and trigger member,</p> | <p>The sear and sear catch are engaged in the set position</p>  <p><b>Set Position</b></p> <p>The sear and sear catch are out of engagement in the released position</p>                                                                                                                                               |

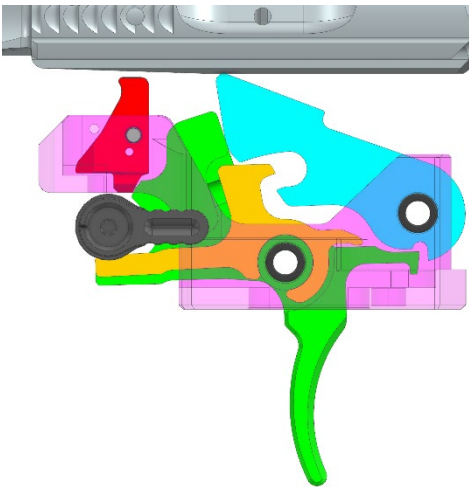
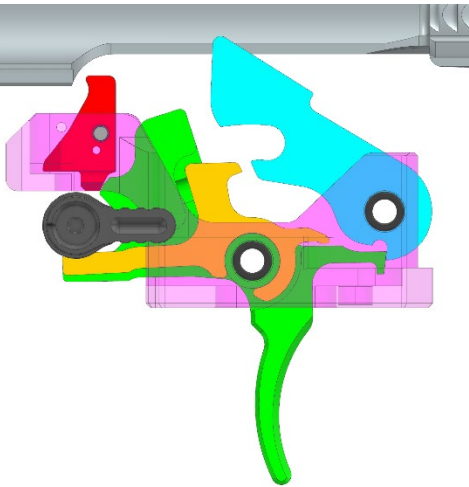


| '336 Patent, Claim 3                                                                                                                                                                                                                                                        | The Disruptor                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                |
| <p>a locking member mounted in said housing to pivot on a transverse locking member pin,</p> <p>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</p> | <p>The Disruptor has a locking member (red) that is mounted in the housing and it pivots on a transverse locking member pin.</p>  <p>When the locking bar (red) is in the first position, the locking member blocks the trigger (green) from being pulled</p> |

| '336 Patent, Claim 3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  <p data-bbox="846 743 1336 779"><b>First Position Mechanically Blocked</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <p data-bbox="203 804 740 978">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,</p> <p data-bbox="203 1535 740 1787">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</p> | <p data-bbox="763 804 1365 905">When the locking bar (red) is in the second position, it does not prevent the trigger (green) from being pulled.</p>  <p data-bbox="800 1482 1382 1518"><b>Second Position Not Mechanically Blocked</b></p> <p data-bbox="763 1535 1414 1745">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.</p> |
| <p data-bbox="203 1829 740 1890">a safety selector adapted to be mounted in a fire control mechanism pocket of a</p>                                                                                                                                                                                                                                                                                                                                                                                                                   | <p data-bbox="763 1829 1414 1890">The Disruptor includes a safety selector that is mounted in the fire control mechanism pocket of a</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

| '336 Patent, Claim 3                                                                                                                                                                                                                                                                                                                                                                                          | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>receiver to pivot between safe, standard semi-automatic, and forced reset semi-automatic positions,</p> <p>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,</p>                          | <p>receiver to pivot between safe, standard semi-automatic, and “forced reset” semi-automatic positions.</p>  <p>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</p>  <p><b>“Forced Reset” Semi-Automatic Position</b></p> |
| <p>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,</p> <p>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</p> | <p>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</p>                                                                                                                                                                                                                                                                                                                                   |

| '336 Patent, Claim 3                                                                                                                                                                                        | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>pull said trigger member to fire the firearm, and</p>                                                                                                                                                    |  <p><b>Standard Semi-Automatic Position</b></p>                                                                                                                                                                                                                                                                 |
| <p>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,</p> | <p>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 mechanically moved to the set position.</p>  <p><b>Trigger Pulled to the Rear, Hammer First Touches the Trigger</b></p> |

| '336 Patent, Claim 3                                                                                                                                                                                                                                                                                                                                        | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                             |  <p data-bbox="776 745 1409 819"><b>Hammer has now Caused the Trigger to Move to the Reset Position</b></p>                                                                                                                                                                                                                                                                                         |
| <p data-bbox="203 844 743 949">said safety selector preventing said disconnecter hook from catching said hammer hook,</p> <p data-bbox="203 1522 743 1705">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.</p> | <p data-bbox="766 844 1377 949">The safety selector prevents the disconnecter (orange) hook from catching the hammer (blue) hook</p>  <p data-bbox="1010 1465 1172 1501"><b>Set Position</b></p> <p data-bbox="766 1522 1377 1663">When the bolt carrier reaches a substantially in-battery position the user can pull the trigger (green) without manually releasing pressure off the trigger</p> |

154. 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.

155. 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.

156. 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 mechanically reset a trigger mechanism and infringe the '336 Patent.

157. 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.

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



159. By their 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.

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

161. 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.

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

163. 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 VIII — INFRINGEMENT OF THE '807 PATENT**

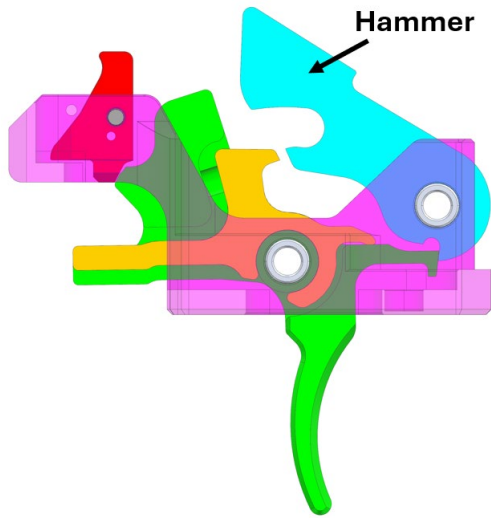
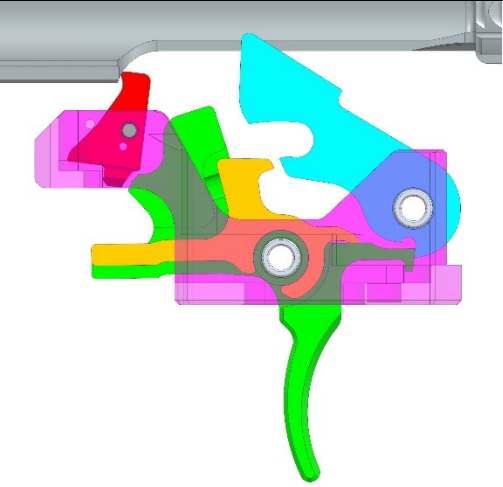
164. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

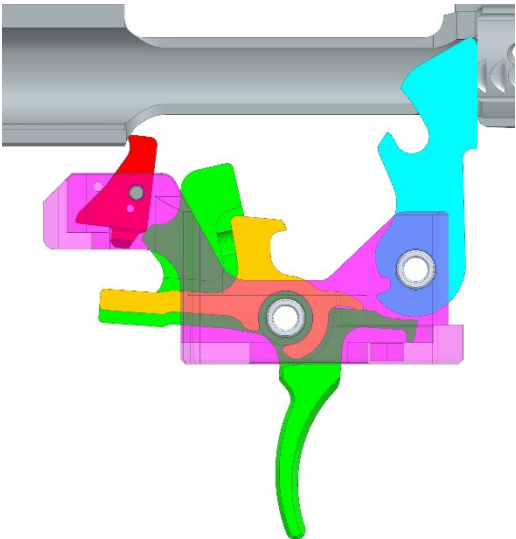
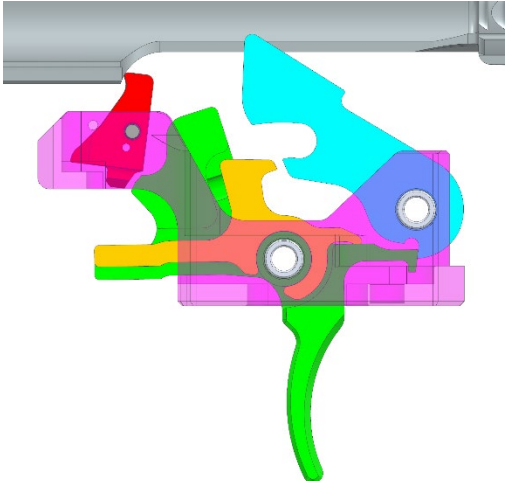
165. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '807 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, 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.

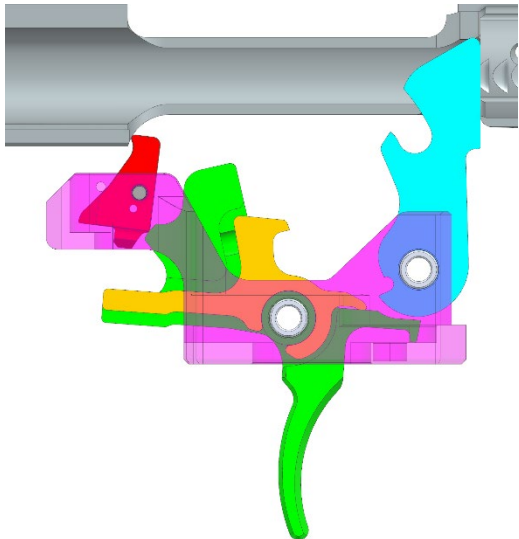
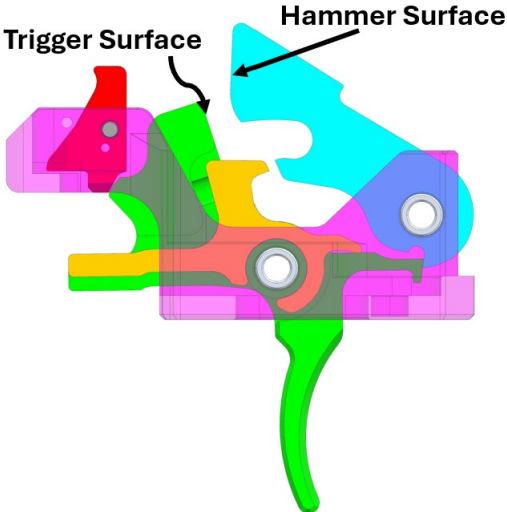
166. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '807 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

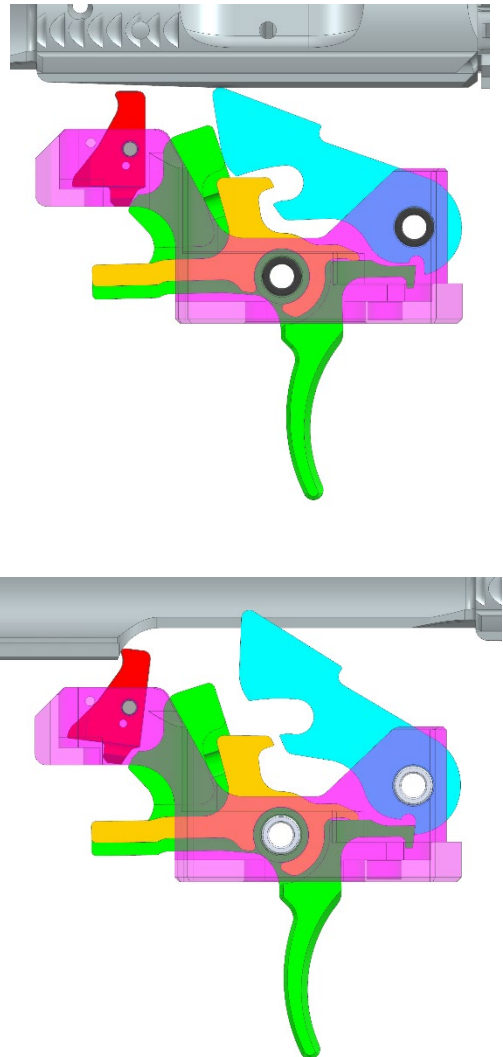
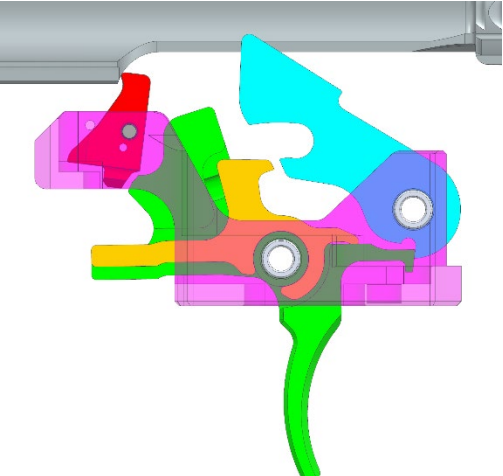
167. An exemplary comparison of the Disruptor, when assembled and used as intended, with claim 1 of the '807 patent is illustrated in the chart below:

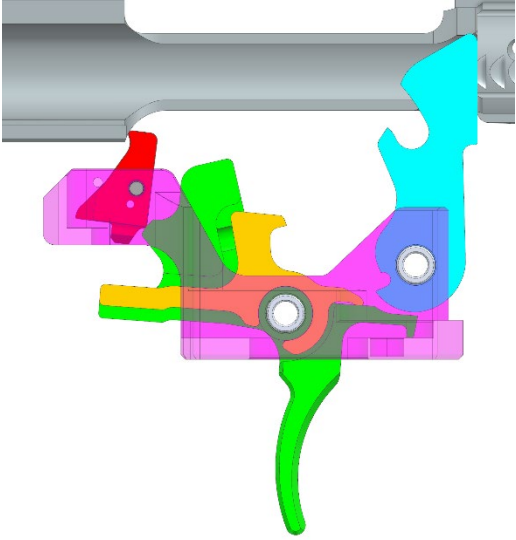
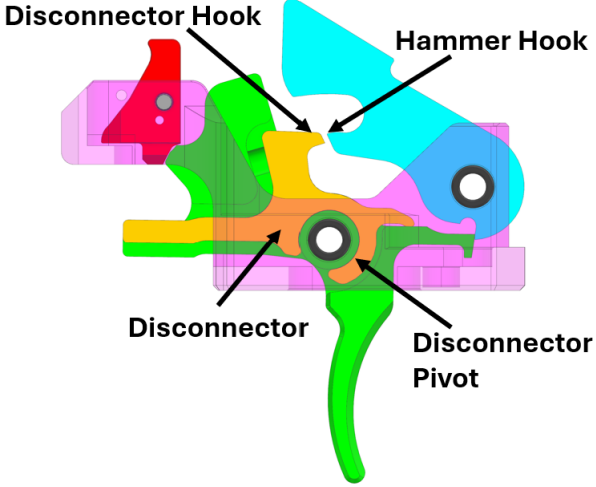
| '807 Patent Claim 1                                                                                                                                           | The Disruptor                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A firearm trigger mechanism comprising:                                                                                                                       | <p>The Disruptor is a firearm trigger mechanism.</p>  <p><a href="https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits">https://www.wojtekwaponry.com/product-category/forced-reset-trigger-kits</a></p>      |
| 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 | <p>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.</p> |

| '807 Patent Claim 1 | The Disruptor                                                                                                                                                                                                                       |
|---------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |  <p data-bbox="1157 254 1279 285">Hammer</p> <p data-bbox="695 779 1414 852">(Plaintiff-generated renderings of the Disruptor here and below)</p> |
| between set and     |  <p data-bbox="976 1367 1133 1398">Set Position</p>                                                                                              |

| '807 Patent Claim 1                                                                                                                                                        | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,</p>                                                              |  <p>The diagram shows a cross-sectional view of a firearm's fire control mechanism. A hammer (red) is pivoted rearward, held in place by a sear (green) which is mounted on a transverse trigger member pivot axis (yellow). The trigger member (green) is in its released position, allowing the hammer to move forward. The bolt carrier (grey) is visible at the top.</p> <p><b>Released Position</b></p> |
| <p>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</p> <p>between set</p> |  <p>The diagram shows the same fire control mechanism as above, but the trigger member (green) has moved forward, engaging the sear (green) and holding the hammer (red) in its set position. The bolt carrier (grey) is visible at the top.</p> <p><b>Set Position</b></p>                                                                                                                                |

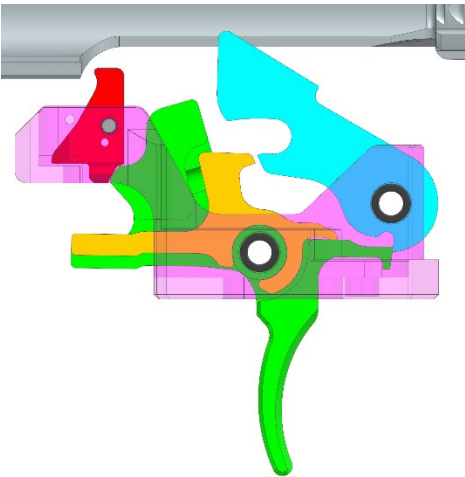
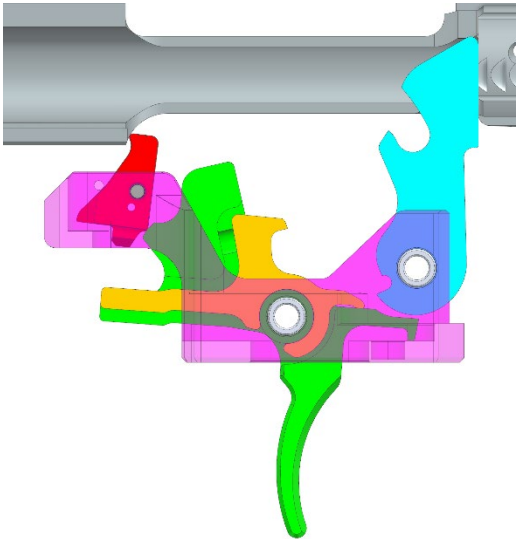
| '807 Patent Claim 1                                                                                                                                                                                                                              | The Disruptor                                          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

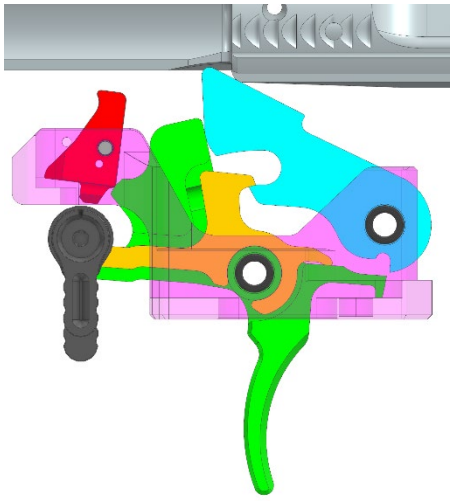
| '807 Patent Claim 1                                                                                        | The Disruptor                                                                                                                                                                       |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                            |                                                                                                  |
| wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member | <p data-bbox="695 1318 1404 1354">The sear and sear catch are engaged in the set position.</p>  |

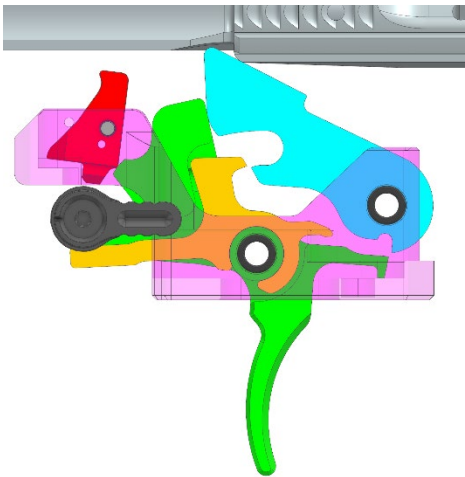
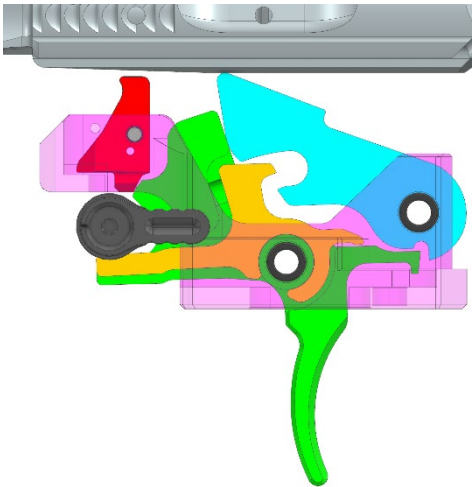
| '807 Patent Claim 1                                                                                                     | The Disruptor                                                                                                                                                                   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

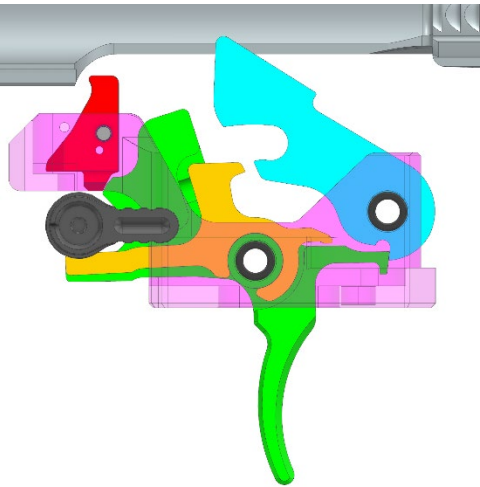
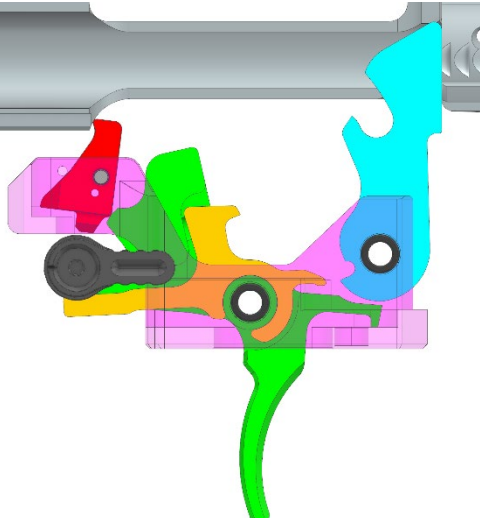




| '807 Patent Claim 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  <p data-bbox="808 741 1302 777"><b>First Position Mechanically Blocked</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p data-bbox="203 800 657 1014">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,</p> <p data-bbox="203 1035 657 1360">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</p> | <p data-bbox="690 800 1404 867">When the locking bar (red) is in the second position, it does not prevent the trigger (green) from being pulled.</p>  <p data-bbox="763 1591 1347 1627"><b>Second Position Not Mechanically Blocked</b></p> <p data-bbox="690 1644 1404 1822">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.</p> |

| '807 Patent Claim 1                                                                                                                                                                                                                                                                                                                                                                                                                                             | The Disruptor                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>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,</p>                                                                                                                                                                                                                                                                           | <p>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.</p>                        |
| <p>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,</p> <p>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</p> | <p>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</p>  <p><b>Standard Semi-Automatic Position</b></p> |
| <p>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,</p>                                                                                                                                                                                                                                                     | <p>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 mechanically moved to the set position.</p>                                                                                        |

| '807 Patent Claim 1                                                                           | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>said safety selector preventing said disconnector hook from catching said hammer hook,</p> | <div data-bbox="824 241 1286 714">  </div> <p data-bbox="711 735 1404 808"><b>Trigger Pulled to the Rear, Hammer First Touches the Trigger</b></p> <div data-bbox="820 871 1291 1354">  </div> <p data-bbox="698 1375 1421 1449"><b>Hammer has now Caused the Trigger to Move to the Reset Position</b></p> <p data-bbox="690 1470 1388 1543">The safety selector prevents the disconnector (orange) hook from catching the hammer (blue) hook.</p> |

| '807 Patent Claim 1                                                                                                                                                                                 | The Disruptor                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                     |  <p style="text-align: center;"><b>Set Position</b></p>                                                                                                               |
| <p>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.</p> | <p>When the bolt carrier reaches a substantially in-battery position the user can pull the trigger (green) without manually releasing pressure off the trigger.</p>  |

168. 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.

169. 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.

170. 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 mechanically reset a trigger mechanism and infringe the '807 Patent.

171. 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.

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

173. By their 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.

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

175. 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.

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

177. 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.

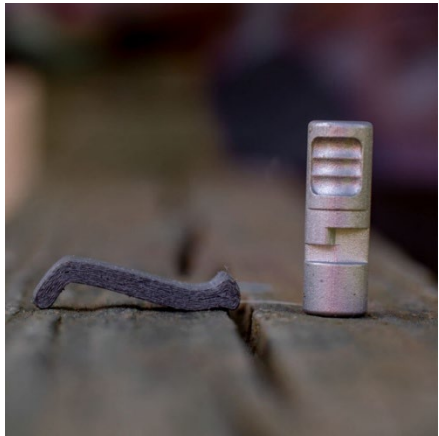
#### **COUNT IX — INFRINGEMENT OF THE '403 PATENT**

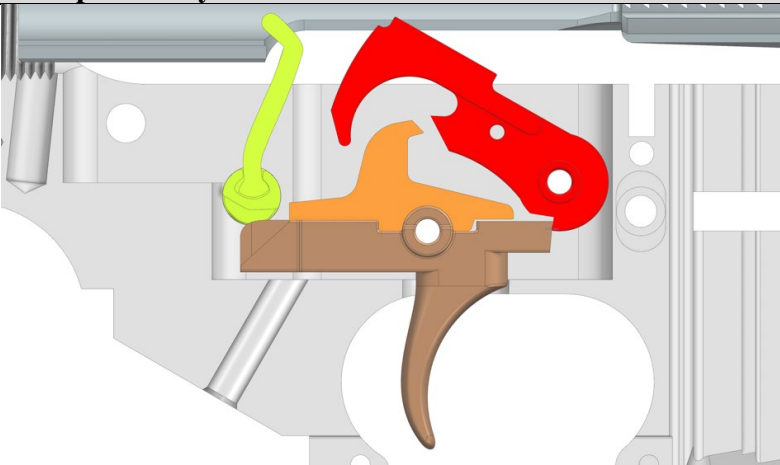
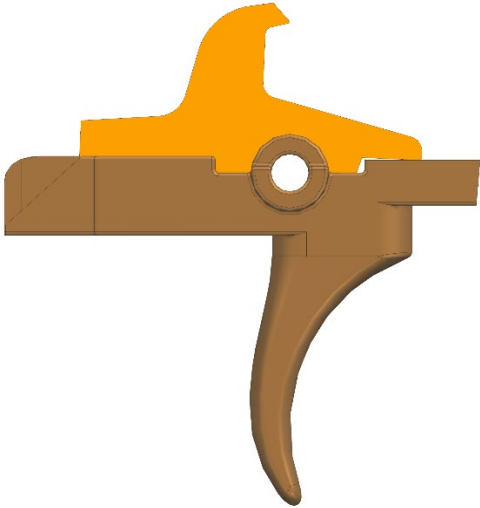
178. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

179. 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 Infringing Devices.

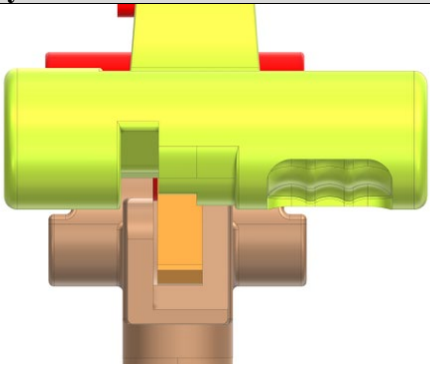
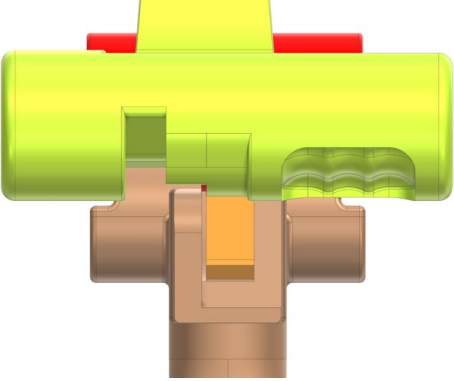
180. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '403 patent, including but not limited to claim 38, literally and/or under the doctrine of equivalents.

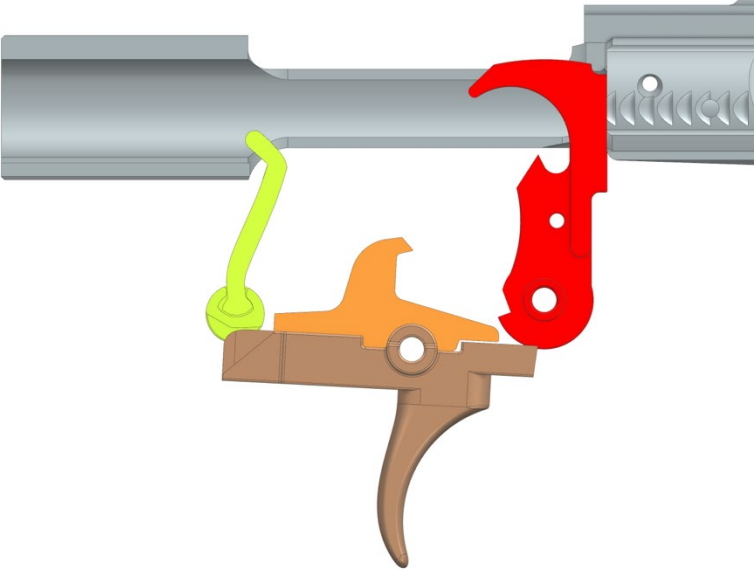
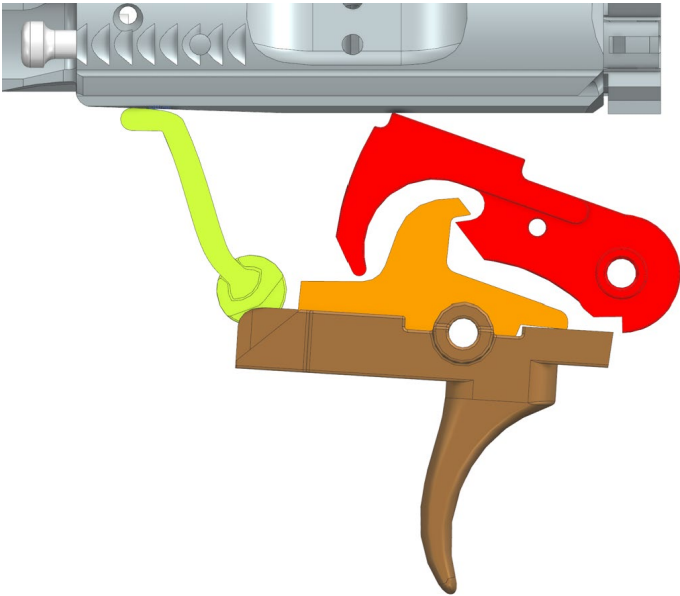
181. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 38 of the '403 patent is illustrated in the chart below:

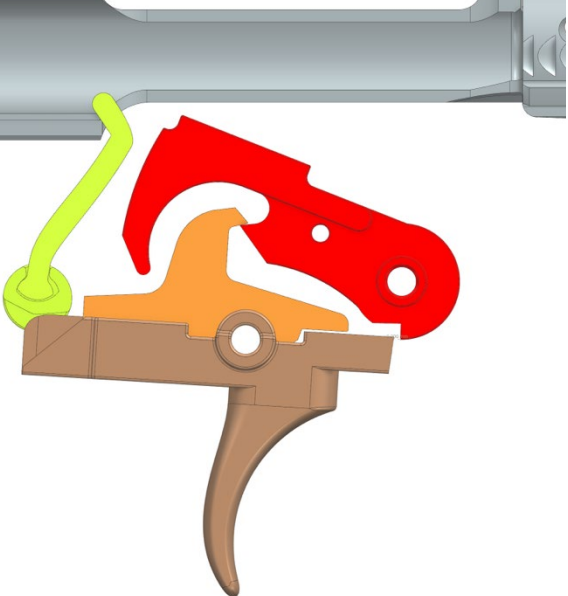
| '403 Patent Claim 38                               | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 38. A forced reset trigger mechanism, comprising:  | <p data-bbox="589 233 1406 302">When installed and used as directed, the Super Safety is part of a trigger mechanism.</p>  <p data-bbox="621 1073 1390 1142"><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p>  <p data-bbox="919 1608 1092 1640"><b>Super Safety</b></p> <p data-bbox="605 1661 1406 1730">Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12</p> |
| a hammer having a hammer hook and adapted to pivot | <p data-bbox="589 1751 1308 1856">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.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

| '403 Patent Claim 38                                                                                                                        | The Super Safety                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>on a transverse hammer pivot axis;</p>                                                                                                   |  <p style="text-align: center;"><b>Super Safety (Installed)</b></p> <p>(Plaintiff-generated renderings of Super Safety here and below)</p>                                                                                                                         |
| <p>a disconnector having a disconnector hook and adapted to pivot on a transverse disconnector pivot axis;</p> <p>a trigger member; and</p> | <p>The Super Safety is installed along with a disconnector (orange) which has a disconnector hook and pivots on a transverse disconnector pivot axis, and a trigger member (brown)</p>  <p style="text-align: center;"><b>Disconnector and Trigger Member</b></p> |
| <p>a safety selector adapted to be movable between a standard semi-automatic position and a forced reset semi-automatic position,</p>       | <p>The Super Safety is a safety selector adapted to be movable between a standard semi-automatic position,</p>                                                                                                                                                                                                                                       |



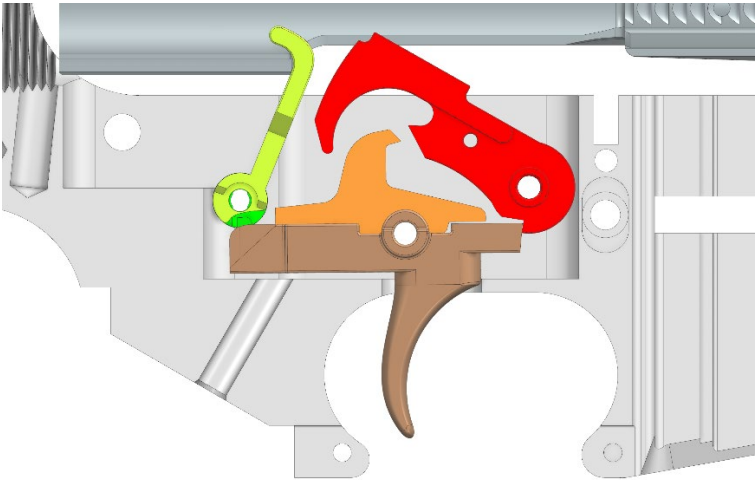
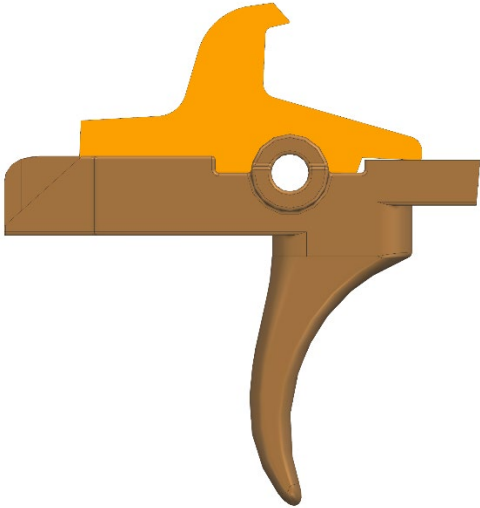
| '403 Patent Claim 38                                                                                                                                            | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                 |  <p data-bbox="646 604 1367 676"><b>Super Safety (installed) in Standard Semi-Automatic Position</b></p> <p data-bbox="602 747 1227 783">. . . and a “forced reset” semi-automatic position,</p>  <p data-bbox="605 1192 1408 1264"><b>Super Safety (installed) in “Forced Reset” Semi-Automatic Position</b></p> |
| <p data-bbox="203 1283 537 1465">wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,</p> | <p data-bbox="592 1283 1404 1354">When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated.</p>                                                                                                                                                                                                                                                                                                                               |

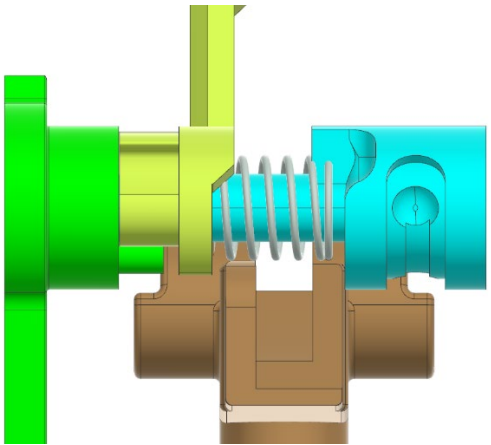
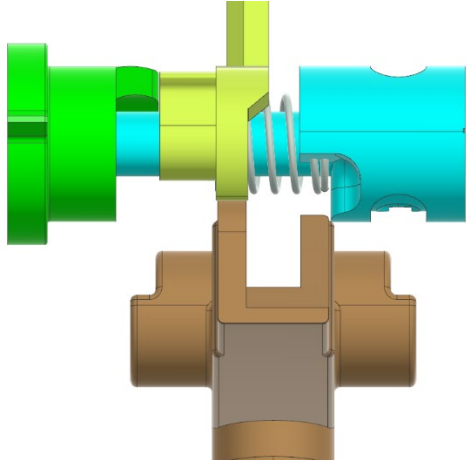
| '403 Patent Claim 38                                                                                                                                                                                                                              | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                      |
| <p>and after the hammer pivots rearward to a position where the hammer hook is past the disconnecter hook,</p> <p>rearward pressure on the trigger member must be reduced to permit the trigger member to then be actuated to fire a firearm.</p> | <p>The hammer (red) pivots rearward to a position where the hammer hook is past the disconnecter hook (orange),</p>  <p><b>Hammer Hook is Past Disconnecter Hook</b></p> <p>Rearward pressure on the trigger member (brown) must be reduced to permit the trigger member to then be actuated to fire a firearm.</p> |

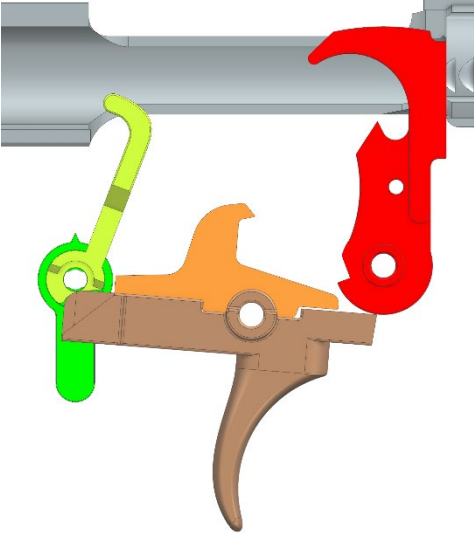
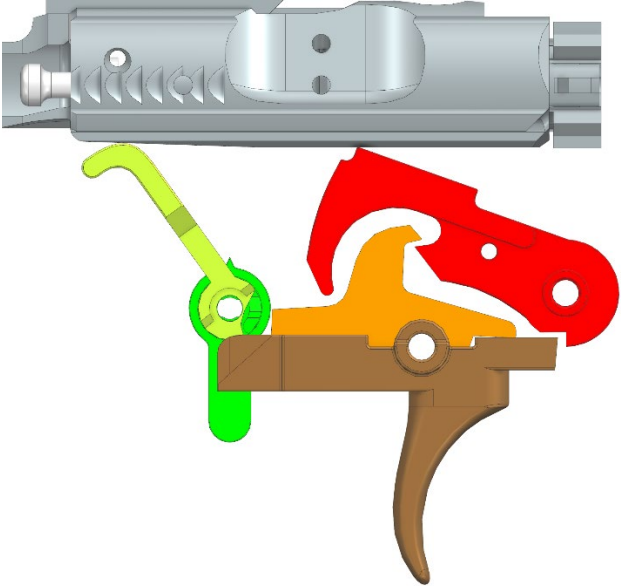
| '403 Patent Claim 38 | The Super Safety                                                                                                                                       |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |  <p data-bbox="833 850 1182 882"><b>Pressure Must be reduced</b></p> |

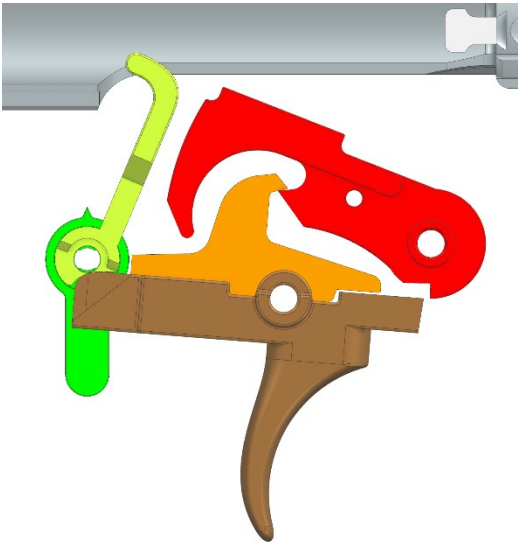
182. An exemplary comparison of the Atrius Selector, when assembled and used as intended, with claim 38 of the '403 Patent is illustrated in the chart below:

| '403 Patent Claim 38                                                                   | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p data-bbox="203 1134 527 1197">38. A forced reset trigger mechanism, comprising:</p> | <p data-bbox="597 1134 1404 1197">When installed and used as directed, the Atrius Selector is part of a trigger mechanism.</p>  <p data-bbox="621 1644 1393 1717"><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p> <p data-bbox="906 1732 1109 1764"><b>Atrius Selector</b></p> |

| '403 Patent Claim 38                                                                                                                        | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;</p>                                                | <p>The Atrius Selector (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.</p>  <p><b>Atrius Selector (Installed)</b><br/>(Plaintiff-generated renderings of Atrius Selector here and below)</p> |
| <p>a disconnecter having a disconnecter hook and adapted to pivot on a transverse disconnecter pivot axis;</p> <p>a trigger member; and</p> | <p>The Atrius Selector 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).</p>  <p><b>Disconnecter and Trigger Member</b></p>                                             |

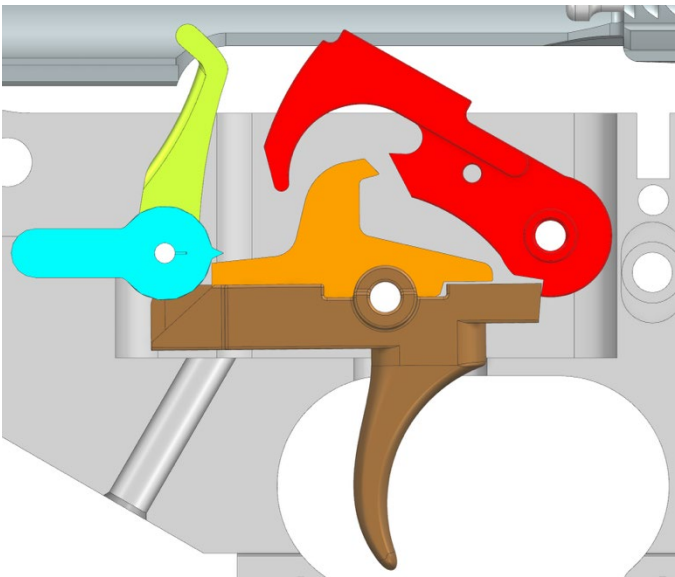
| '403 Patent Claim 38                                                                                                                         | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>a safety selector adapted to be movable between a standard semi-automatic position</p> <p>and a forced reset semi-automatic position,</p> | <p>The Atrius Selector is a safety selector adapted to be movable between a standard semi-automatic position,</p>  <p><b>Atrius Selector (installed) in Standard Semi-Automatic Position</b></p> <p>. . . and a “forced reset” semi-automatic position.</p>  <p><b>Atrius Selector (installed) in “Forced Reset” Semi-Automatic Position</b></p> |

| '403 Patent Claim 38                                                                                                              | The Atrius Selector                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,</p> | <p>When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated.</p>  <p>This diagram shows a side view of the trigger assembly. A brown trigger member is in its rearward position. An orange disconnecter hook is positioned above it. A red hammer is in its forward position, with its hook behind the orange hook. A green safety selector lever is in its forward position, blocking the hammer's path.</p> |
| <p>and after the hammer pivots rearward to a position where the hammer hook is past the disconnecter hook,</p>                    | <p>The hammer (red) pivots rearward to a position where the hammer hook is past the disconnecter hook (orange),</p>  <p>This diagram shows the hammer (red) pivoted rearward. Its hook is now past the orange disconnecter hook. The brown trigger member remains in its rearward position. The green safety selector lever is still in its forward position.</p>                                                                                                     |

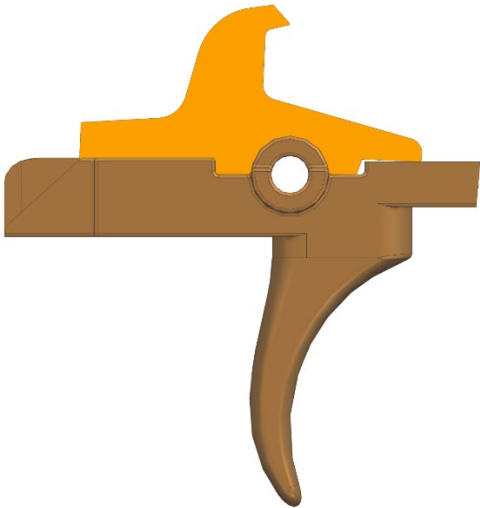
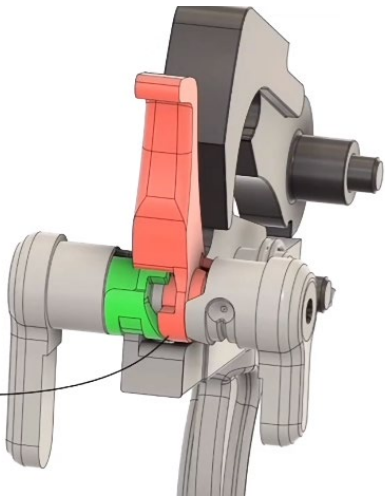
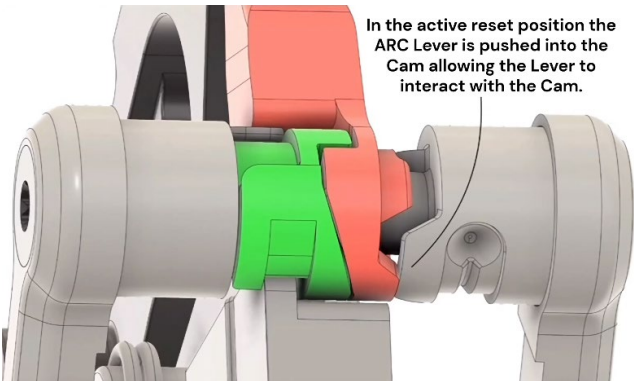
| '403 Patent Claim 38                                                                                                               | The Atrius Selector                                                                                                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>rearward pressure on the trigger member must be reduced to permit the trigger member to then be actuated to fire a firearm.</p> | <p>Rearward pressure on the trigger member (brown) must be reduced to permit the trigger member to then be actuated to fire a firearm.</p>  |

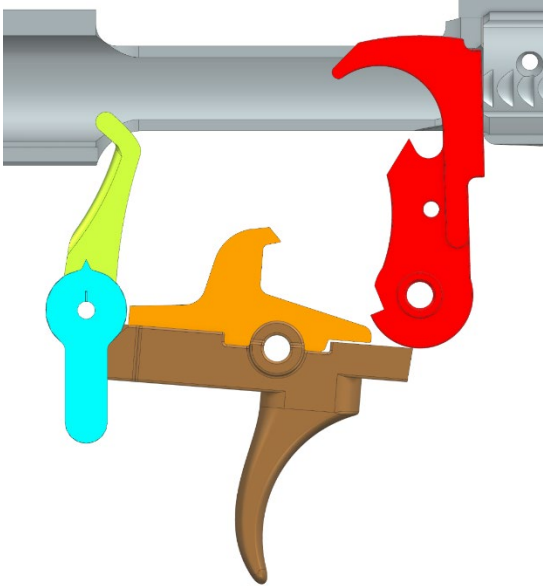
183. An exemplary comparison of the ARC-Fire, when assembled and used as intended, with claim 38 of the '403 patent is illustrated in the chart below:

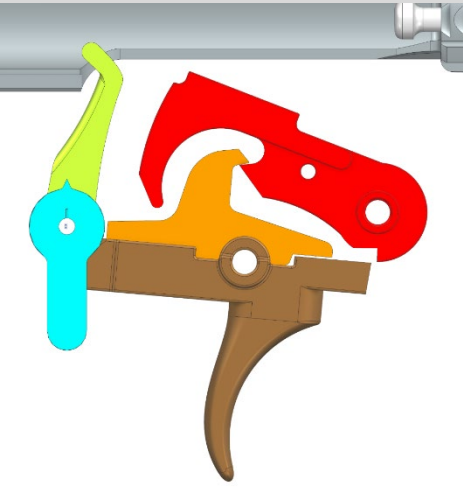
| '403 Patent Claim 38                                     | The ARC-Fire                                                                                                                                                                  |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>38. A forced reset trigger mechanism, comprising:</p> | <p>When installed and used as directed, the ARC Fire is part of a trigger mechanism.</p>  |

| '403 Patent Claim 38                                                                                                       | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                            | <p data-bbox="621 233 1393 302"><a href="https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits">https://www.wojteckweaponry.com/product-category/forced-reset-trigger-kits</a></p>  <p data-bbox="938 947 1073 978"><b>ARC-Fire</b></p>                                       |
| <p data-bbox="203 1003 568 1140">a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;</p> | <p data-bbox="592 1003 1398 1108">The ARC Fire (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.</p>  <p data-bbox="592 1709 1365 1745">(Plaintiff-generated renderings of ARC Fire here and below)</p> |
| <p data-bbox="203 1770 511 1871">a disconnecter having a disconnecter hook and adapted to pivot on a</p>                   | <p data-bbox="592 1770 1373 1871">The ARC Fire is installed along with a disconnecter (orange) which has a disconnecter hook and pivots on a transverse disconnecter pivot axis.</p>                                                                                                                                                                                                 |

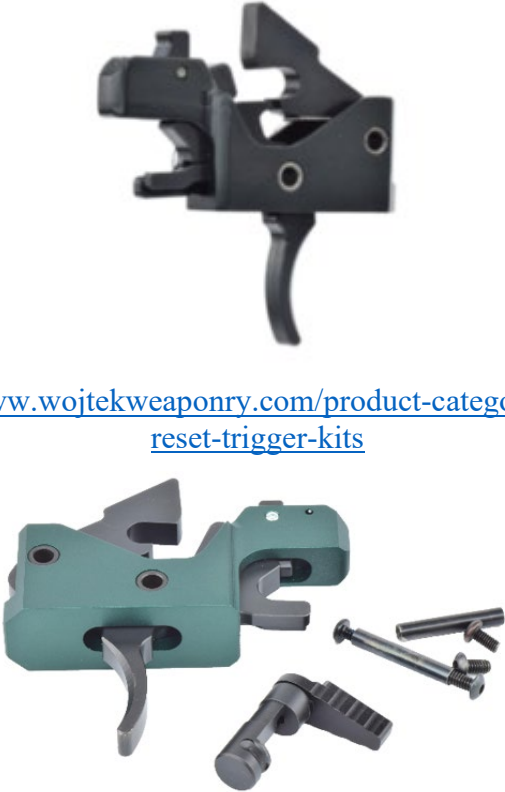


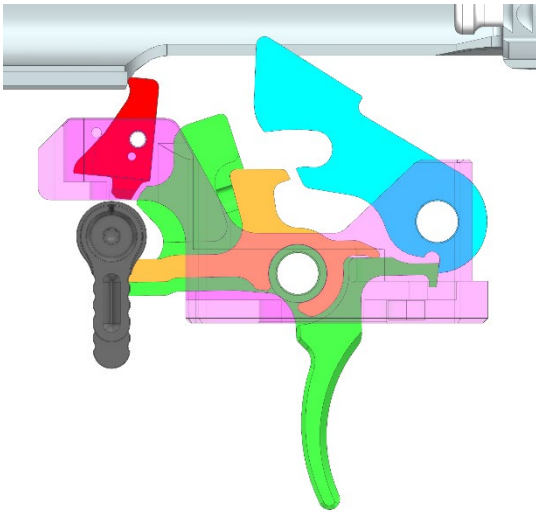
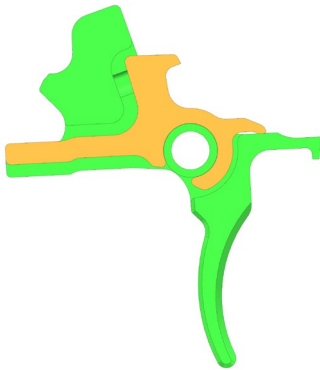
| '403 Patent Claim 38                                                                                                                  | The ARC-Fire                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>transverse disconnecter pivot axis;</p> <p>a trigger member; and</p>                                                               | <p>The ARC Fire is installed along with a trigger member (brown) Transverse pivot axis.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>a safety selector adapted to be movable between a standard semi-automatic position and a forced reset semi-automatic position,</p> | <p>The ARC Fire is a safety selector adapted to be movable between a <b>(standard semi-automatic)</b> position,</p>  <p>In the SEMI position, the ARC Lever will not engage the Cam as its rotated rearward leaving the Cam in the unlocked position.</p> <p>... and a “forced reset” semi-automatic position,</p>  <p>In the active reset position the ARC Lever is pushed into the Cam allowing the Lever to interact with the Cam.</p> |

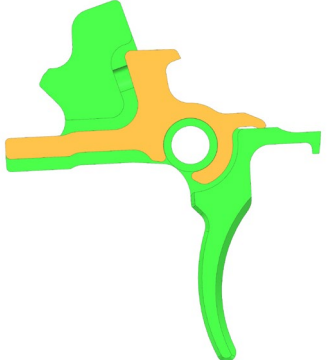
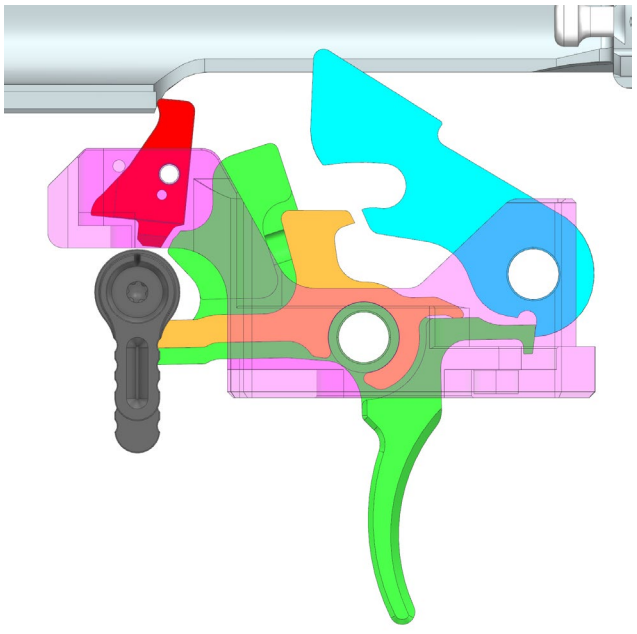
| '403 Patent Claim 38                                                                                                               | The ARC-Fire                                                                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                    | <b>Image with text taken from AS Designs Facebook video</b>                                                                                                                                                  |
| <p>wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,</p>  | <p>When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated.</p>  |
| <p>and after the hammer pivots rearward to a position where the hammer hook is past the disconnecter hook,</p>                     | <p>The hammer (red) pivots rearward to a position where the hammer hook is past the disconnecter hook (orange),</p>      |
| <p>rearward pressure on the trigger member must be reduced to permit the trigger member to then be actuated to fire a firearm.</p> | <p>Rearward pressure on the trigger member (brown) must be reduced to permit the trigger member to then be actuated to fire a firearm.</p>                                                                   |

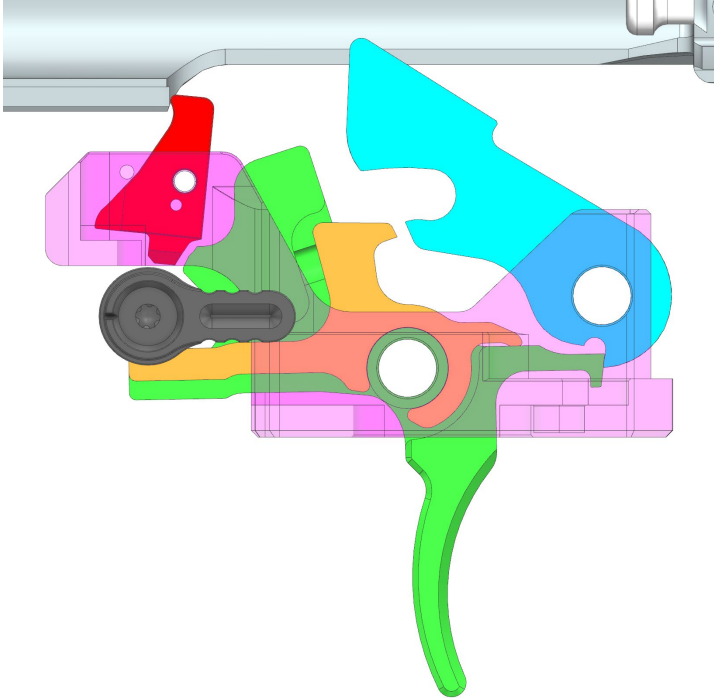
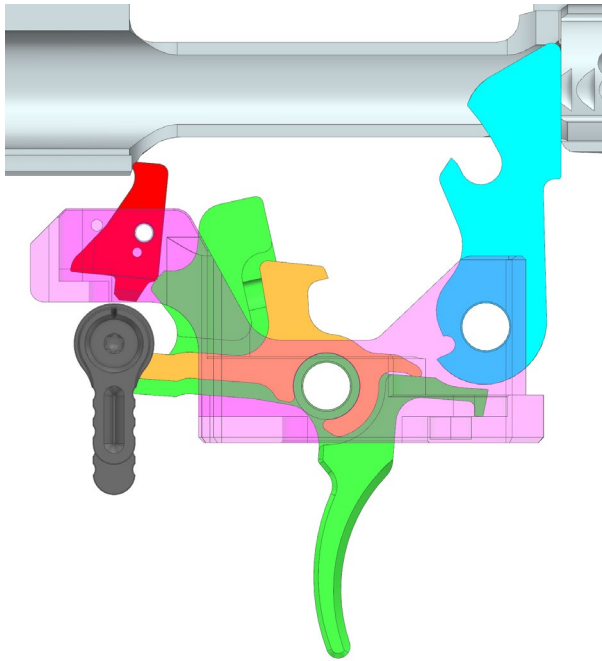
| '403 Patent Claim 38 | The ARC-Fire                                                                       |
|----------------------|------------------------------------------------------------------------------------|
|                      |  |

184. 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                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>38. A forced reset trigger mechanism, comprising:</p> | <p>When installed and used as directed, the Disruptor is part of a trigger mechanism.</p>  <p><a href="https://www.wojteckweapony.com/product-category/forced-reset-trigger-kits">https://www.wojteckweapony.com/product-category/forced-reset-trigger-kits</a></p> |

| '403 Patent Claim 38                                                                                           | The Disruptor                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;</p>                   | <p style="text-align: center;"><b>Disruptor</b></p> <p>The Disruptor has a hammer (blue) that has a hammer hook and pivots on a transverse axis.</p>  <p style="text-align: center;"><b>Disruptor (Installed)</b></p> <p style="text-align: center;">(Plaintiff-generated renderings of Disruptor here and below)</p> |
| <p>a disconnector having a disconnector hook and adapted to pivot on a transverse disconnector pivot axis;</p> | <p>The Disruptor has a disconnector (orange) which has a disconnector hook and pivots on a transverse disconnector pivot axis.</p>  <p style="text-align: center;"><b>Disconnector (orange)</b></p>                                                                                                                 |
| <p>a trigger member; and</p>                                                                                   | <p>The Disruptor has a trigger member (green) which has a disconnector hook and pivots on a transverse disconnector pivot axis.</p>                                                                                                                                                                                                                                                                     |

| '403 Patent Claim 38                                                                                                  | The Disruptor                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                       |  <p data-bbox="841 630 1172 667"><b>Trigger Member (green)</b></p>                                                                                                                                                                                   |
| <p data-bbox="203 688 555 829">a safety selector adapted to be movable between a standard semi-automatic position</p> | <p data-bbox="592 688 1334 756">The Disruptor has a safety selector adapted to be movable between a (standard semi-automatic) position,</p>  <p data-bbox="609 1417 1404 1449"><b>Disruptor (installed) in Standard Semi-Automatic Position</b></p> |
| <p data-bbox="203 1474 511 1539">and a forced reset semi-automatic position,</p>                                      | <p data-bbox="592 1474 1221 1505">. . . and a “forced reset” semi-automatic position,</p>                                                                                                                                                                                                                                              |

| '403 Patent Claim 38                                                                                                              | The Disruptor                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                   |  <p><b>Disruptor (installed) in “Forced Reset” Semi-Automatic Position</b></p>                                                                                                                                                                    |
| <p>wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,</p> | <p>When safety selector is in the standard semi-automatic position the trigger member (green) is rearwardly actuated.</p>  <p>The hammer (blue) pivots rearward to a position where the hammer hook is past the disconnecter hook (orange).</p> |



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.

186. 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.

187. 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.

188. 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.



189. 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.

190. 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.

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

192. 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.

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

194. 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 X — FEDERAL TRADEMARK INFRINGEMENT**  
**15 U.S.C. § 1114(1)**

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

196. As described above, Plaintiff RBTM is the owner and Plaintiff Rare Breed is the exclusive licensee of the FRT Marks in connection with firearm triggers.

197. The federal trademark registrations for the FRT 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.

198. The FRT 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 Marks have become uniquely associated in the minds of consumers and the trade with Plaintiffs.

199. The reputation Plaintiffs have built in the FRT Marks is of great value to Plaintiffs.

200. Plaintiffs' use of and rights in the FRT Marks predate any use by Defendants of FRT.

201. 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.

202. Defendants' use of the FRT Marks 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).

203. 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.

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

205. 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 XI — FALSE DESIGNATION OF ORIGIN**  
**15 U.S.C. § 1125(A)**

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

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

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

209. 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.

210. 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).

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

212. 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 Marks with Plaintiffs.

213. Plaintiffs are entitled to injunctive relief prohibiting Defendants from using the FRT Marks or any other mark confusingly similar to the FRT Marks.

214. 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 XII — COMMON LAW TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION**

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

216. As described above, Plaintiff RBTM owns and Plaintiff Rare Breed is the exclusive licensee of the distinctive FRT 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.

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

218. 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.

219. 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.

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

221. 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 Marks with Plaintiffs.

222. Plaintiffs are entitled to injunctive relief prohibiting Defendants from using FRT or any other mark confusingly similar to the FRT Marks.

223. 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 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 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 Marks or any similar or derivative term that infringes or is likely to be confused with the FRT 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 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: August 19, 2026

Respectfully submitted,

/s/ Robert R. Lucic

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