

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

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

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

and

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

Plaintiffs.

v.

**Nocturnal Apparel & Co LLC, a Texas
limited liability company,**

and

**Vincent Michael Vukanovich, an
individual,**

Defendants.

CASE NO. 3:26-cv-2341

**COMPLAINT FOR PATENT AND
TRADEMARK INFRINGEMENT**

JURY TRIAL DEMANDED

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

PARTIES

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

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

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

4. Upon information and belief, Nocturnal Apparel & Co LLC is a limited liability company organized under the laws of Texas with an address of 1714 Marcella Ln., Rowlett, TX 75089.

5. Upon information and belief, Vincent Michael Vukanovich is an individual residing at 1714 Marcella Ln., Rowlett, TX 75089, who is the owner or an owner of Nocturnal Apparel & Co LLC and directs its operations, including directing Nocturnal Apparel & Co 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”), 12,578,159 (“the ’159 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 ’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 C.

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

15. 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”).

16. RBTM is the owner of the trademark FRT[®] and variations thereof. 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."

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

18. 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.

19. 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

20. 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.

21. 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.

22. 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.

23. 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.

24. 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.

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

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

THE INFRINGING DEVICES

27. 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"):

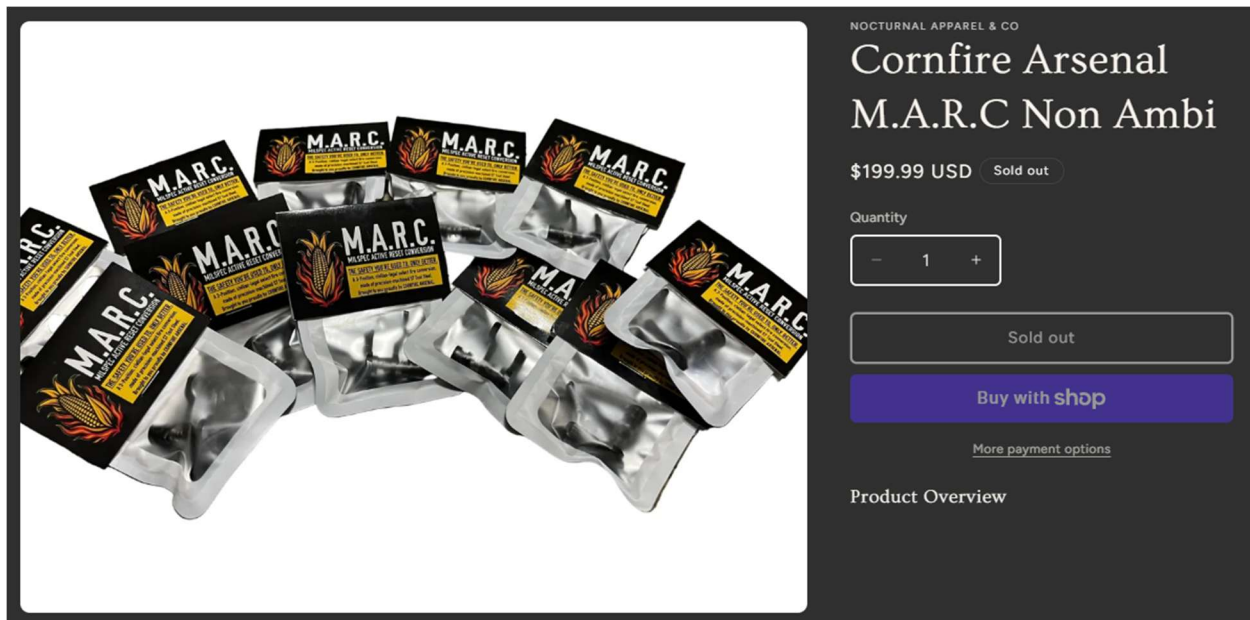
I. The M.A.R.C.

28. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale a (3-Position) “Cornfire Arsenal M.A.R.C. Non Ambi” (“the M.A.R.C.”), which embodies the technology claimed in at least the ’247, ’784, ’159, and ’403 Patents.

29. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the M.A.R.C. via the website <https://nocturnalapparel.co/products/cornfire-arsenal-m-a-r-c-non-ambi>, 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.

30. Exemplary images are shown below:



31. The M.A.R.C. 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.

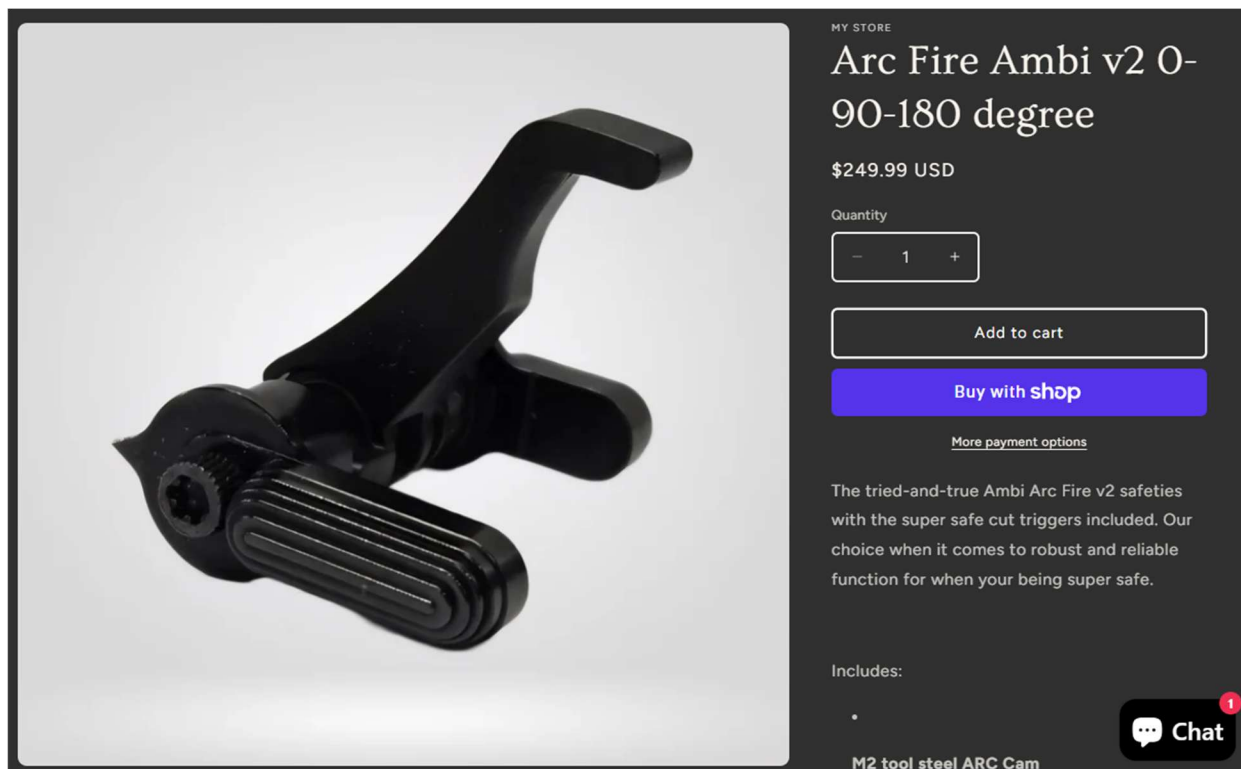
II. The ARC-Fire

32. 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.

33. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the ARC-Fire via the website <https://nocturnalapparel.co/products/arc-fire-ambi-v1>, 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.

34. Exemplary images are shown below:



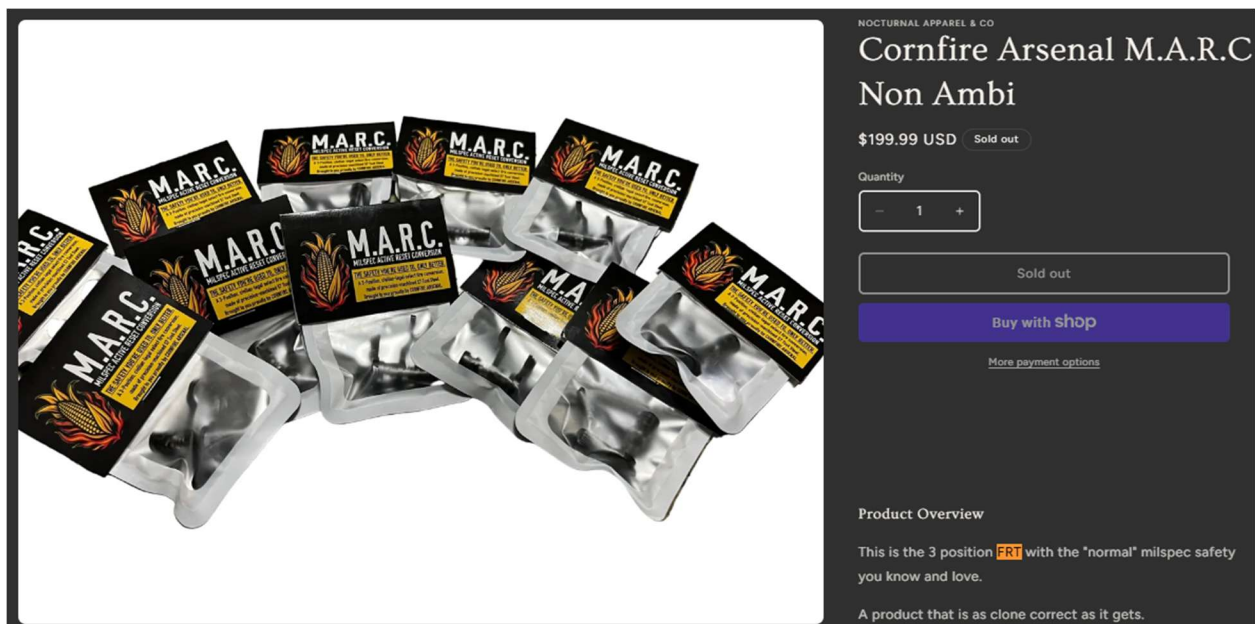
35. The ARC-Fire can operate in a “disconnecter mode,” which is much like that of a standard AR-15 trigger. The user can switch between safe, standard semiautomatic with disconnecter, and “forced reset” semiautomatic with cam modes by rotating the safety selector between positions.

INFRINGEMENT OF THE FRT MARKS

36. 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.

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

38. Defendants are advertising their products as “FRT” as shown at: <https://nocturnalapparel.co/products/cornfire-arsenal-m-a-r-c-non-ambi>. Exemplary highlighted images are shown below:



39. Despite Defendants’ marketing, Defendants’ products are **not** one of Plaintiffs’ FRT products.

40. 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.

41. 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

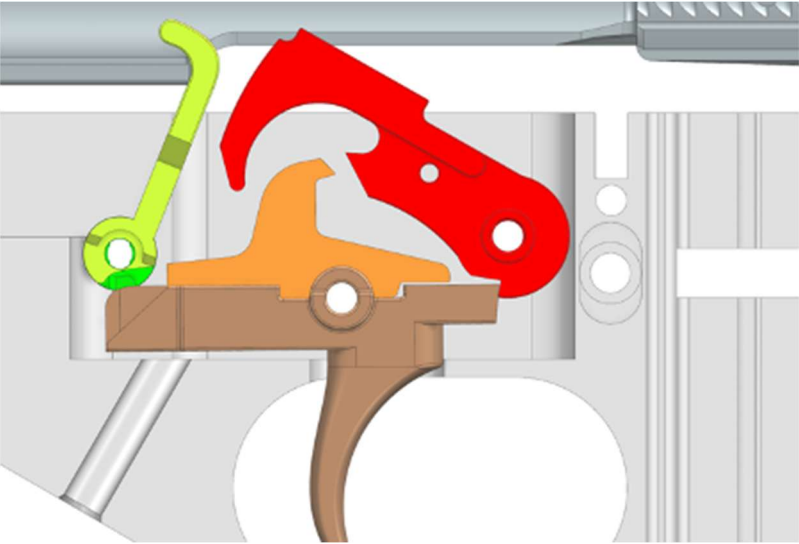
42. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

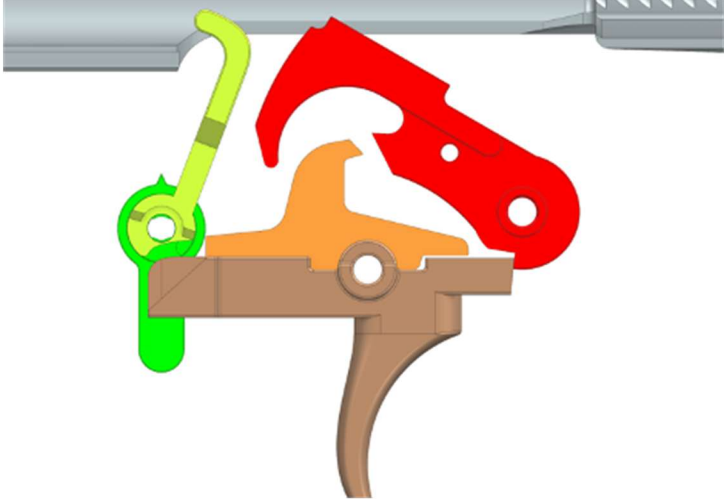
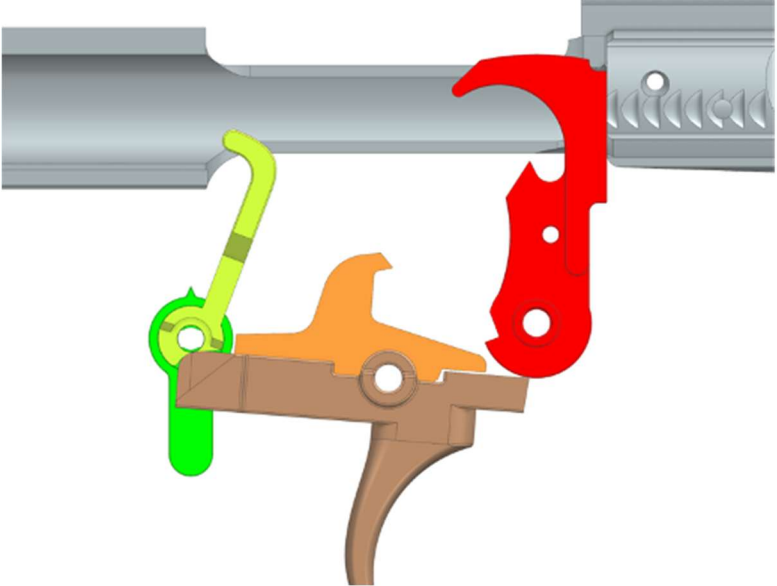
43. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents, by among other things, making, using,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

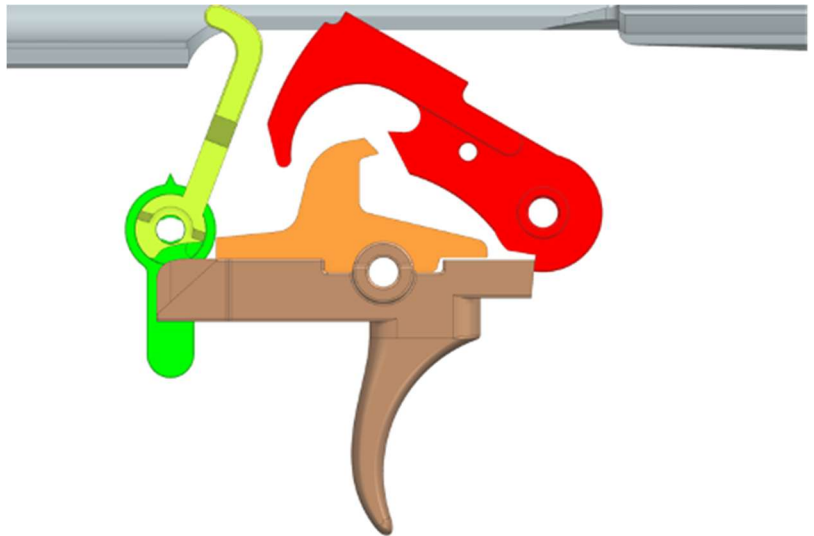
44. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents.

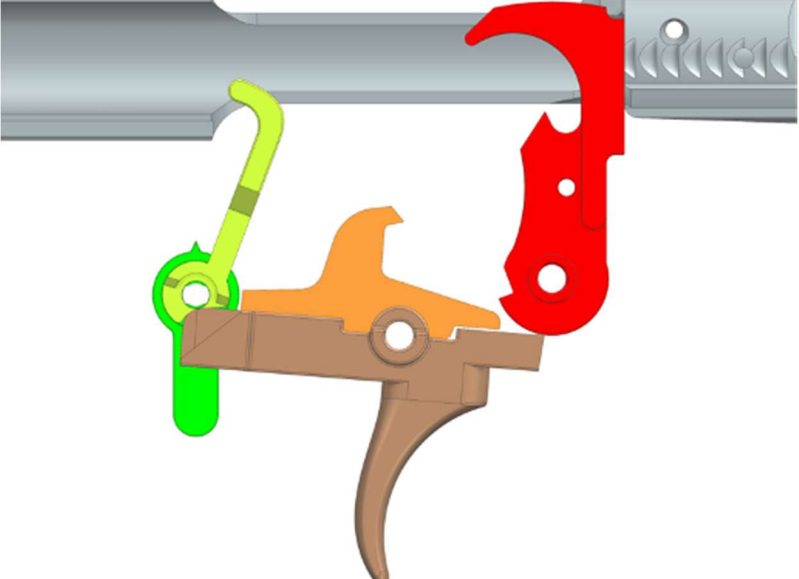
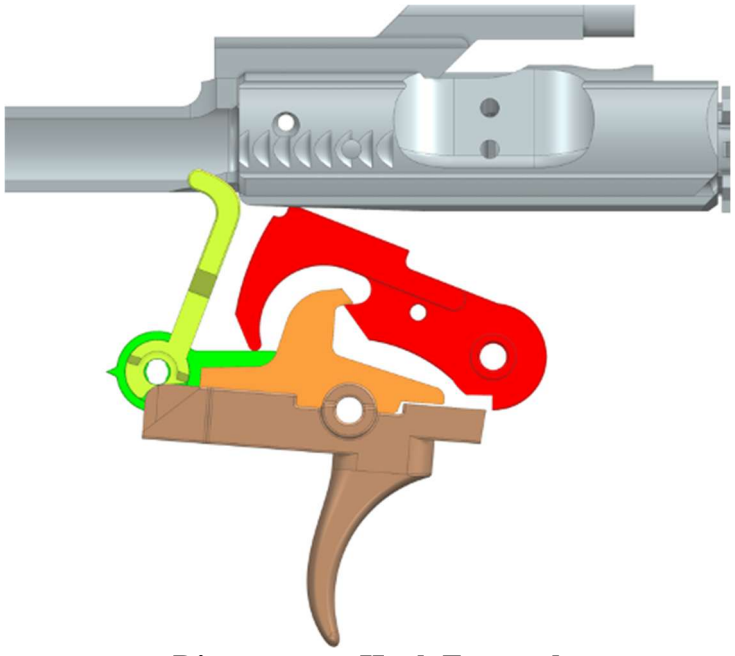
45. An exemplary comparison of the M.A.R.C., when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

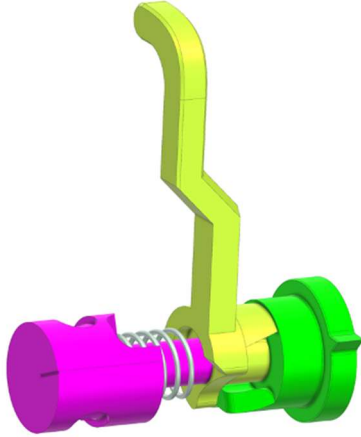
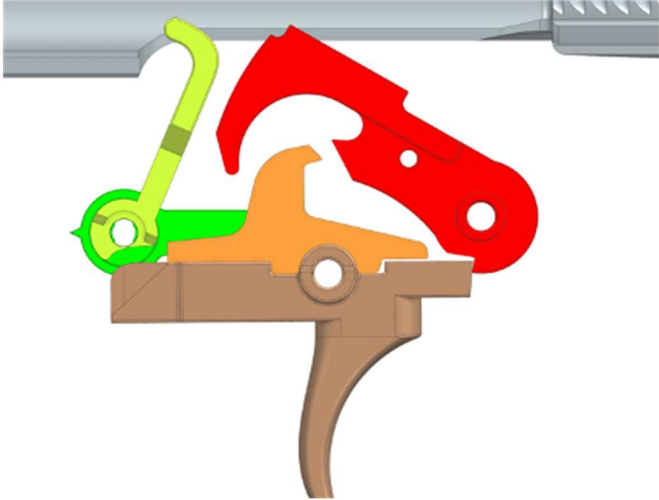
'247 Patent, Claim 15	The M.A.R.C.
15. A firearm trigger mechanism comprising:	When installed and used as directed, the M.A.R.C. is part of a trigger mechanism and functions as a cam that in at least one mode, both causes the reset of the trigger and locks the trigger during the cycle of operation.

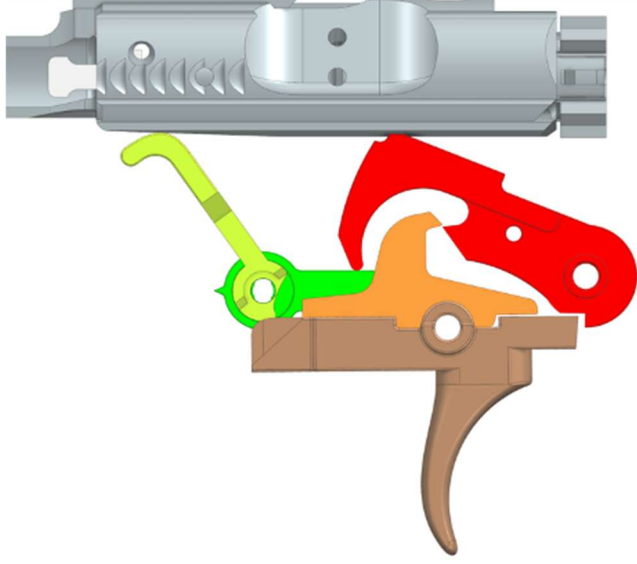
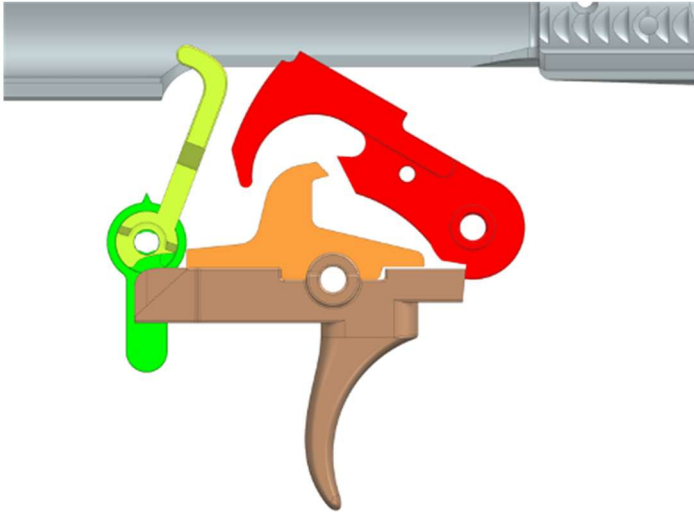
'247 Patent, Claim 15	The M.A.R.C.
	 M.A.R.C.
a hammer having a sear catch and a hook for engaging a disconnecter and adapted to be mounted in a fire control mechanism pocket of a receiver	The M.A.R.C. (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear catch and a hook for engaging a disconnecter (orange).  (Plaintiff-generated renderings of M.A.R.C. here and below)
to pivot on a transverse hammer pivot axis between set and released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt carrier.

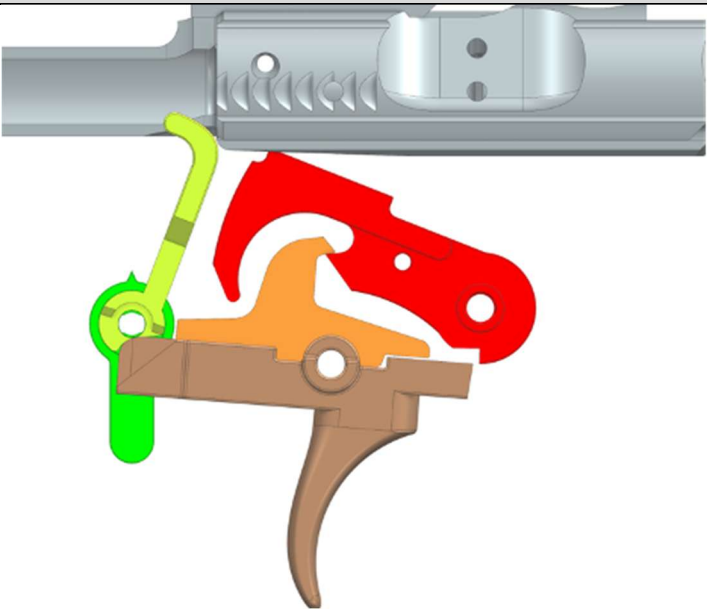
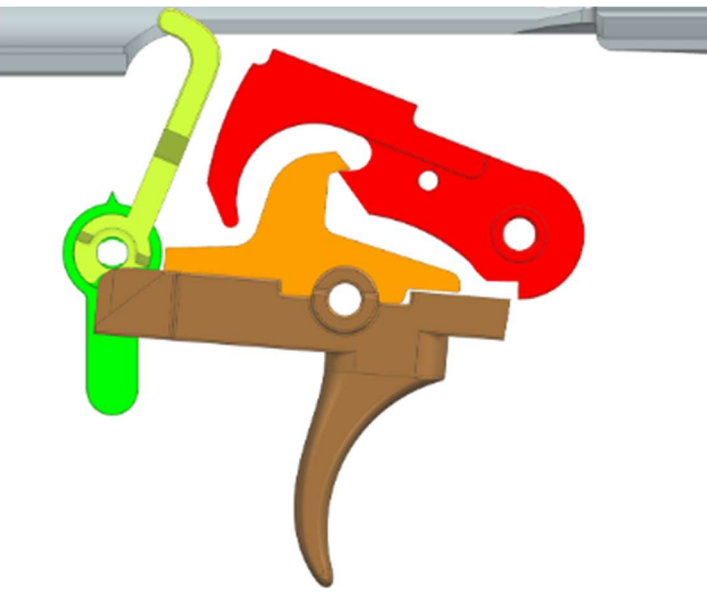
'247 Patent, Claim 15	The M.A.R.C.
	 Hammer Set Position  Hammer Released Position
a trigger member having a sear and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and released positions,	The M.A.R.C. (yellow) is installed with 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.

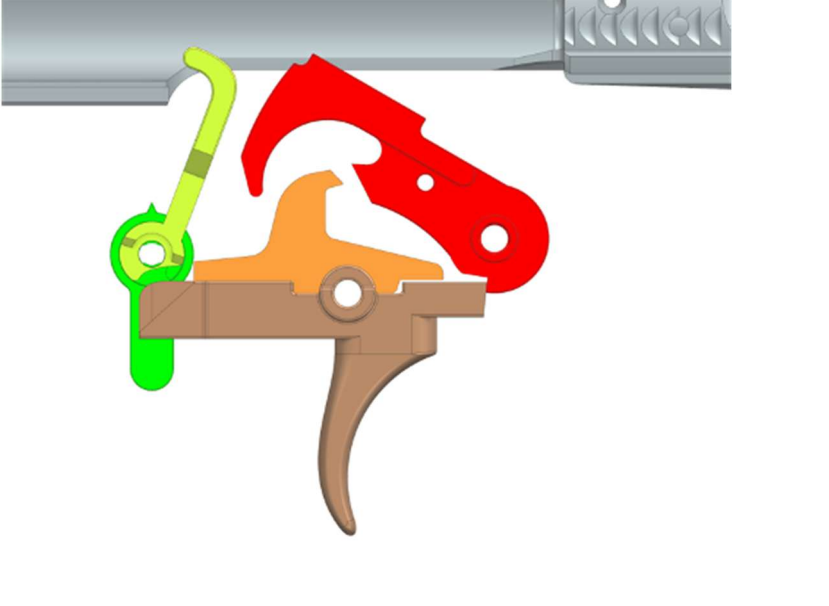
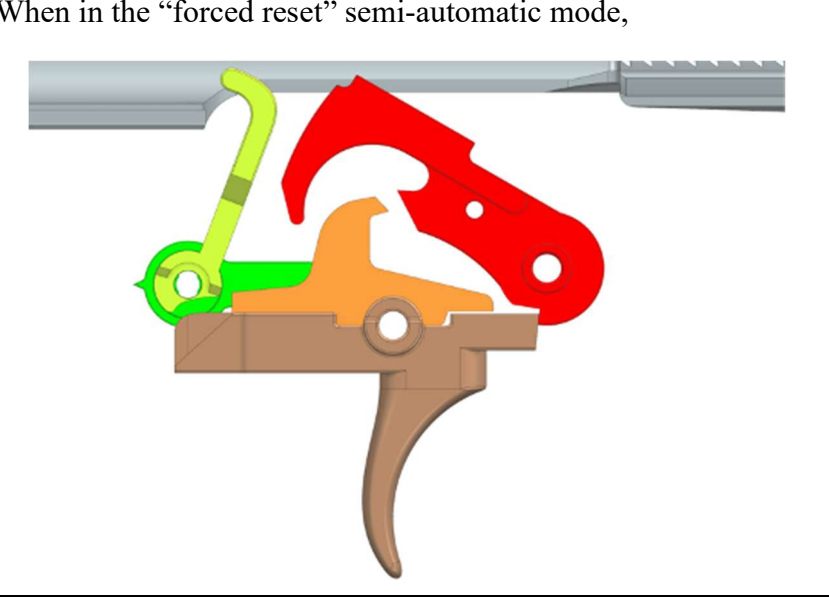
'247 Patent, Claim 15	The M.A.R.C.
	
wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member	The sear of the trigger member (brown) and sear catch of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.  Trigger Member Set Position
and are out of engagement in said released positions of said hammer and trigger member,	The sear of the trigger member (brown) and sear catch of the hammer (red) are out of engagement in the released position.

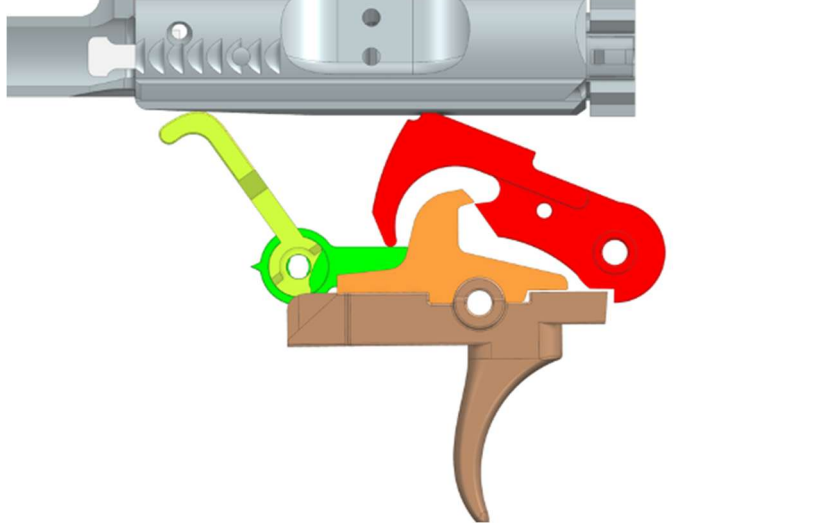
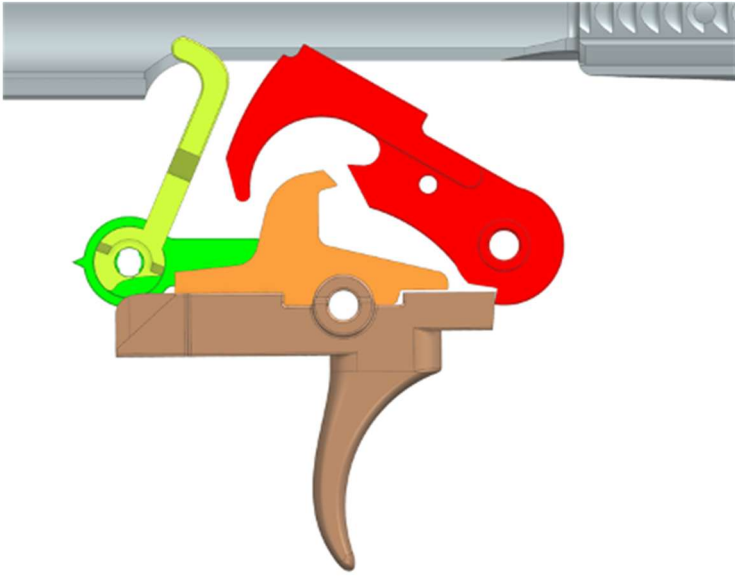
'247 Patent, Claim 15	The M.A.R.C.
	 The diagram shows a side view of a trigger assembly. A brown trigger is at the bottom. Above it is an orange disconnect member with a hook on its left side. A red hammer is positioned above the orange member, with its hook engaged with the orange member's hook. A yellow M.A.R.C. lever is on the left, pivoted on a green cam. The entire assembly is mounted on a grey metal frame. Trigger Member Released Position
said disconnecter having a hook for engaging said hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis,	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).  The diagram shows a side view of the trigger assembly with the orange disconnect member's hook engaged with the red hammer's hook. The yellow M.A.R.C. lever is still on the left, pivoted on the green cam. The assembly is mounted on a grey metal frame. Disconnecter Hook Engaged
and a cam having a cam lobe and adapted to be movably mounted in the	The M.A.R.C. has a cam and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting M.A.R.C., shown in yellow, in fire control mechanism pocket)

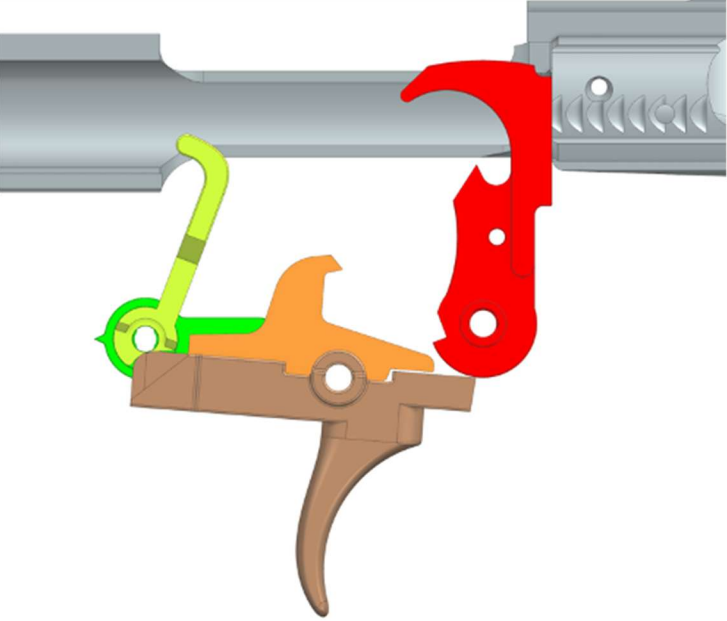
'247 Patent, Claim 15	The M.A.R.C.
fire control mechanism pocket,	 M.A.R.C. Cam with Lobe and Lever
said cam being movable between a first position and a second position, in said second position said cam lobe forces said trigger member towards said set position,	The cam is movable between a first position and a second position.  Cam and Lobe First Position In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.

'247 Patent, Claim 15	The M.A.R.C.
	 Cam and Lobe Second Position
whereupon in a standard semi-automatic mode, said cam is in said first position,	During at least part of the cycle in the standard semi-automatic mode, the cam is in the first position. 
rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnecter hook catches said hammer hook,	Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.

'247 Patent, Claim 15	The M.A.R.C.
	
and thereafter the bolt carrier moves forward into battery,	Thereafter, the bolt carrier moves forward into battery, 
at which time a user must manually release said trigger member to free said hammer from said disconnector to permit said hammer and trigger member to pivot to said set positions so that the user can pull said trigger	. . . 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

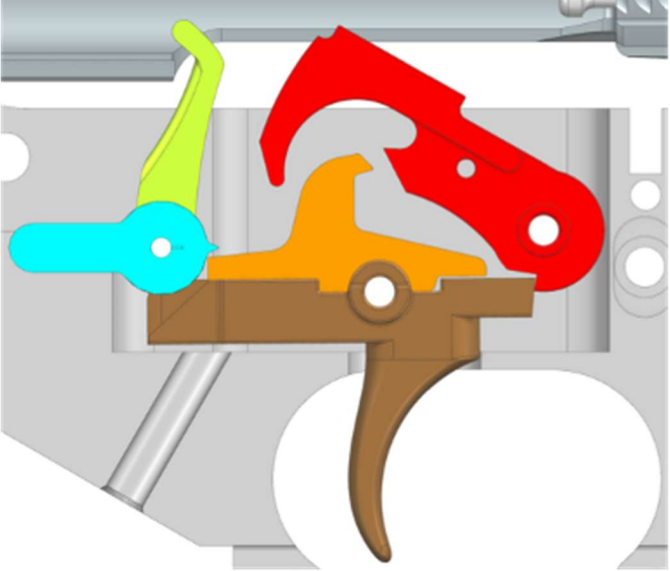
'247 Patent, Claim 15	The M.A.R.C.
member to fire the firearm, and	 A cross-sectional diagram of a firearm trigger assembly. A grey bolt carrier is at the top. Below it, a green hook-shaped disconnector is positioned to the left of an orange trigger member. A red hammer is positioned above the trigger member. The trigger member is in a forward position, and the hammer is in a cocked position.
whereupon in a forced reset semi-automatic mode,	 A cross-sectional diagram of the same firearm trigger assembly. The green disconnector is now positioned to the right of the orange trigger member, preventing it from pivoting rearward. The red hammer is still in a cocked position.
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,	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.

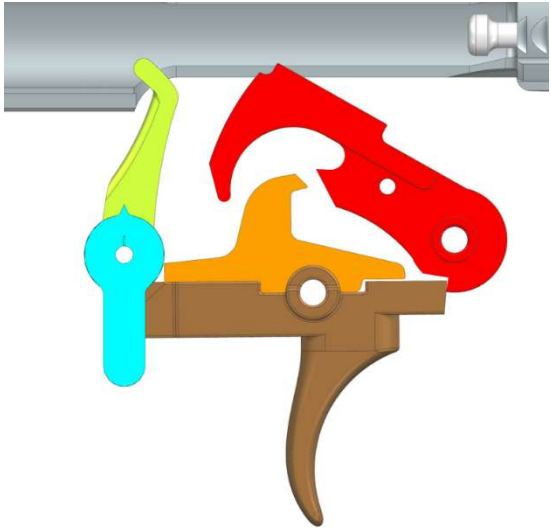
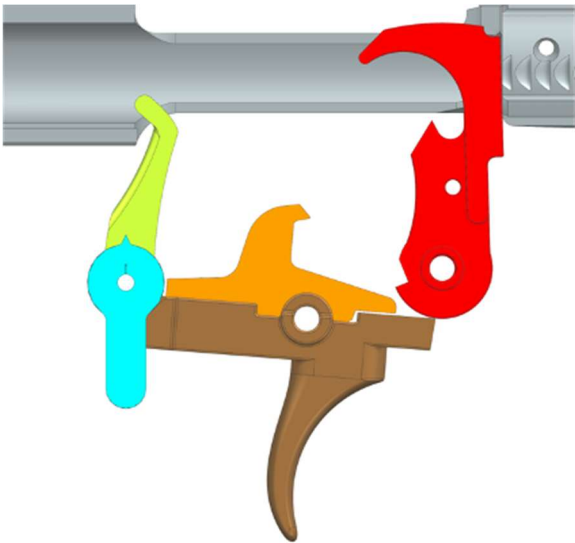
'247 Patent, Claim 15	The M.A.R.C.
	 A cross-sectional diagram of a firearm trigger assembly. A grey bolt carrier is positioned at the top. Below it, a green hook-shaped component is connected to an orange component, which is in turn connected to a red component. These are all mounted on a brown trigger member. The trigger member is in a retracted position.
and thereafter the bolt carrier moves forward into battery,	Thereafter, the bolt carrier moves forward into battery,  A cross-sectional diagram of the same firearm trigger assembly. The grey bolt carrier has moved forward, now resting on the green hook-shaped component. The orange and red components remain in their original positions, and the brown trigger member is still in the retracted 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.

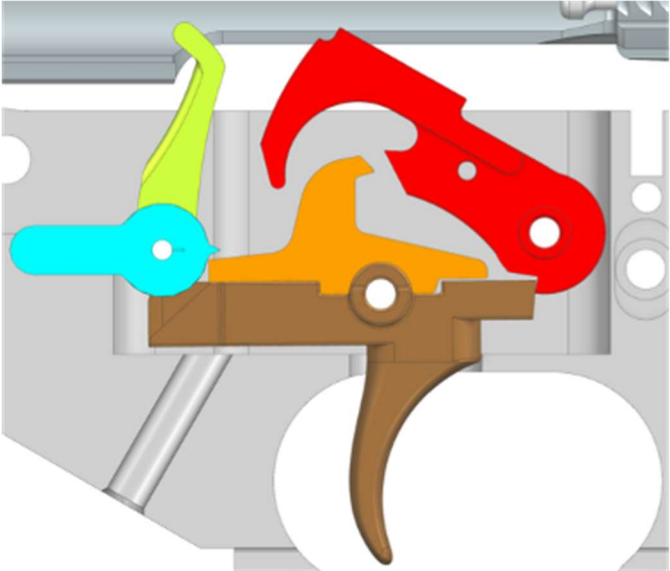
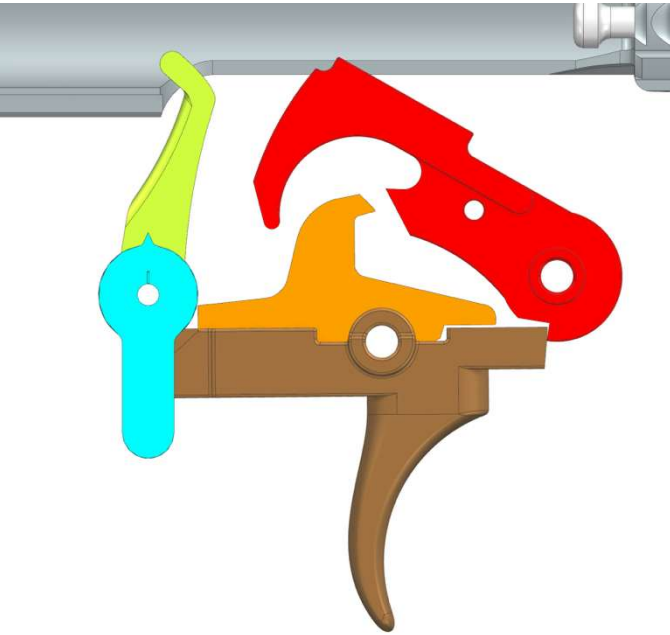
'247 Patent, Claim 15	The M.A.R.C.
	

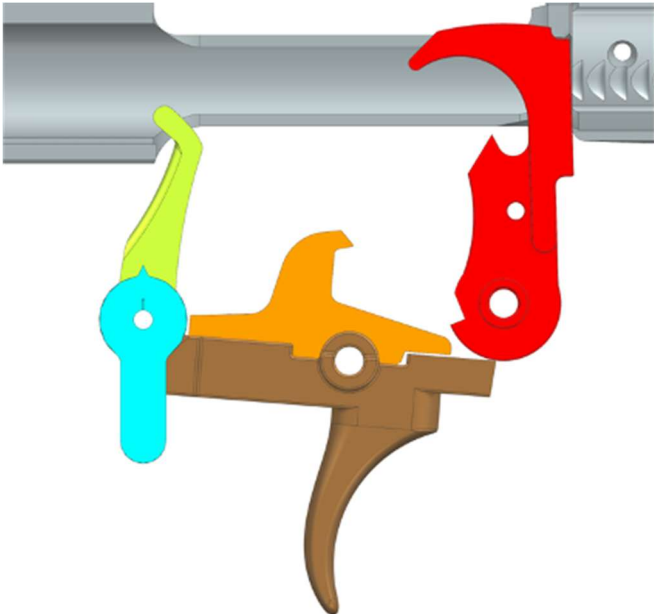
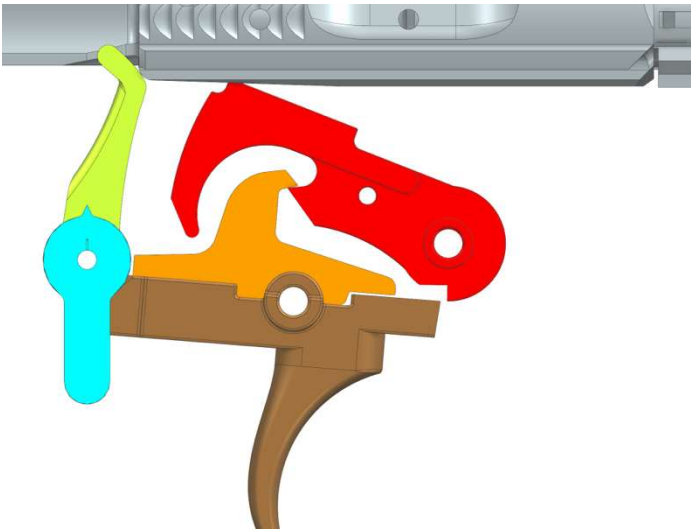
46. An exemplary comparison of the ARC-Fire, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

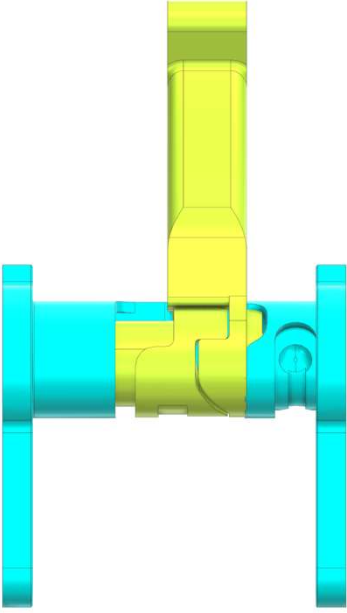
'247 Patent, Claim 15	The ARC-Fire
15. A firearm trigger mechanism comprising:	When installed and used as directed, the ARC-Fire is part of a trigger mechanism and functions as a cam that in at least one mode, both causes the reset of the trigger and locks the trigger during the cycle of operation. 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

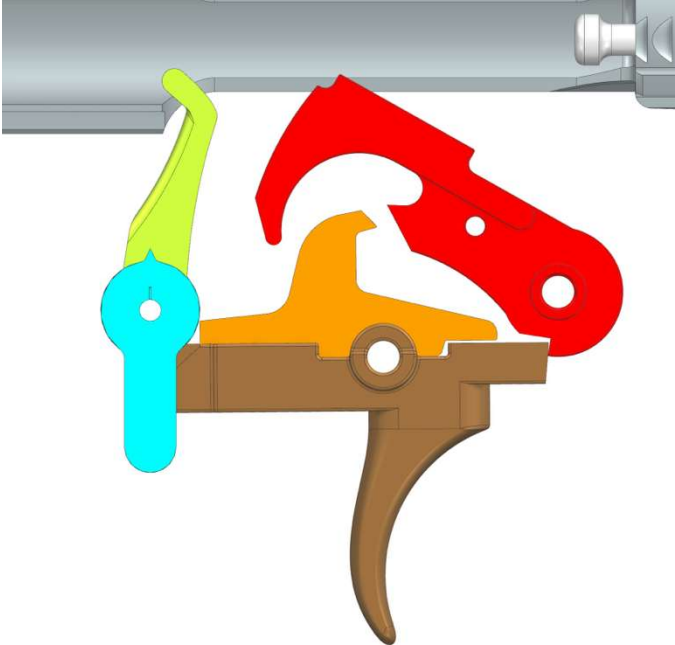
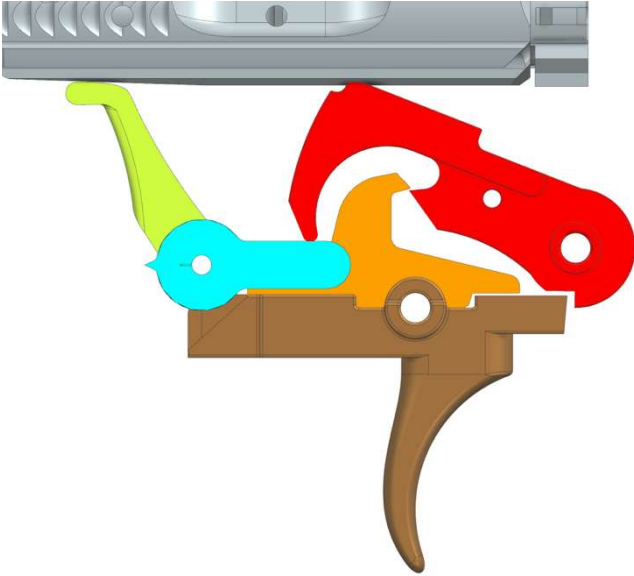
'247 Patent, Claim 15	The ARC-Fire
a hammer having a sear catch and a hook for engaging a disconnector and adapted to be mounted in a fire control mechanism pocket of a receiver	The ARC-Fire (yellow/blue) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has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

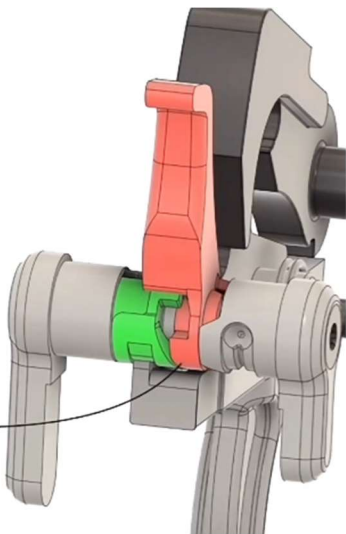
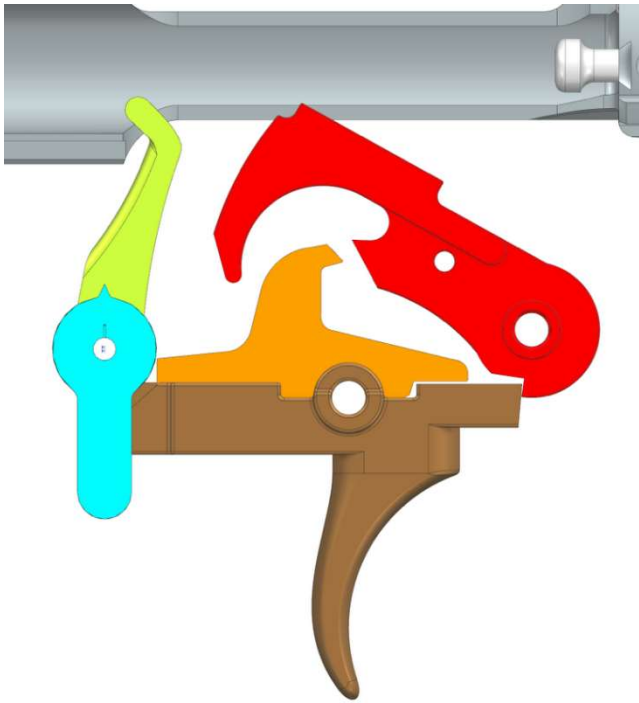
'247 Patent, Claim 15	The ARC-Fire
to pivot on a transverse hammer pivot axis between set and released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt carrier. A cross-sectional diagram of a firearm's hammer mechanism in its set position. A grey bolt carrier is at the top. Below it, a red hammer is pivoted forward, its tip pointing towards a yellow firing pin. The hammer is connected to a brown trigger assembly. A blue pin is visible on the left side of the trigger assembly. Hammer Set Position A cross-sectional diagram of the same hammer mechanism in its released position. The red hammer has pivoted rearward, away from the yellow firing pin. The bolt carrier remains at the top. The brown trigger assembly and blue pin are in the same position as in the set position diagram. Hammer Released Position

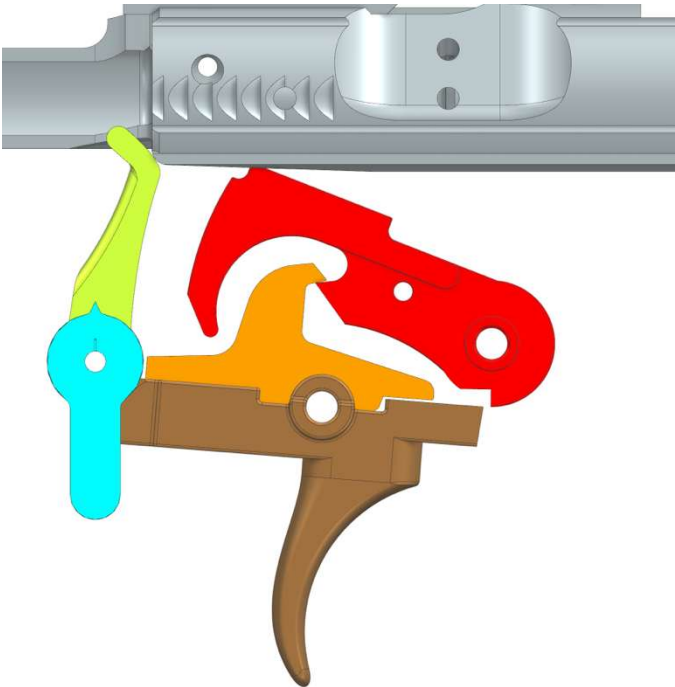
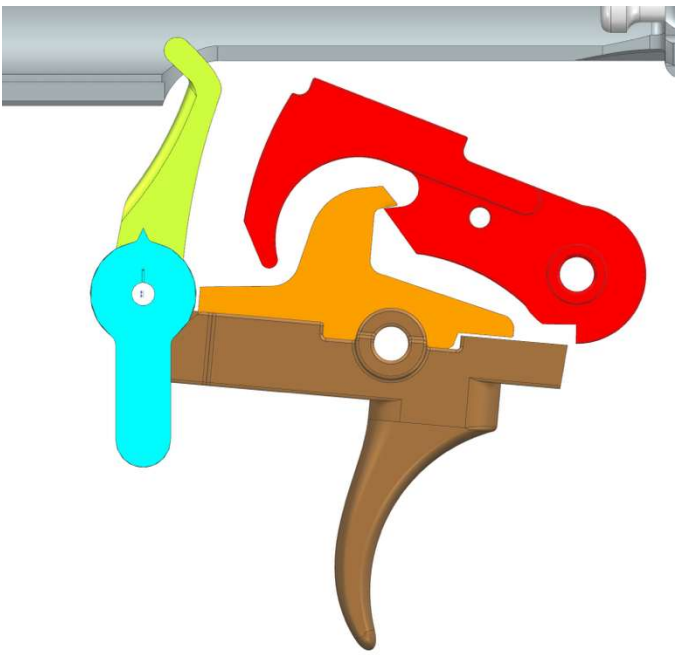
'247 Patent, Claim 15	The ARC-Fire
a trigger member having a sear and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and released positions,	The ARC-Fire (yellow/blue) is installed with a trigger member (brown) in the fire control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

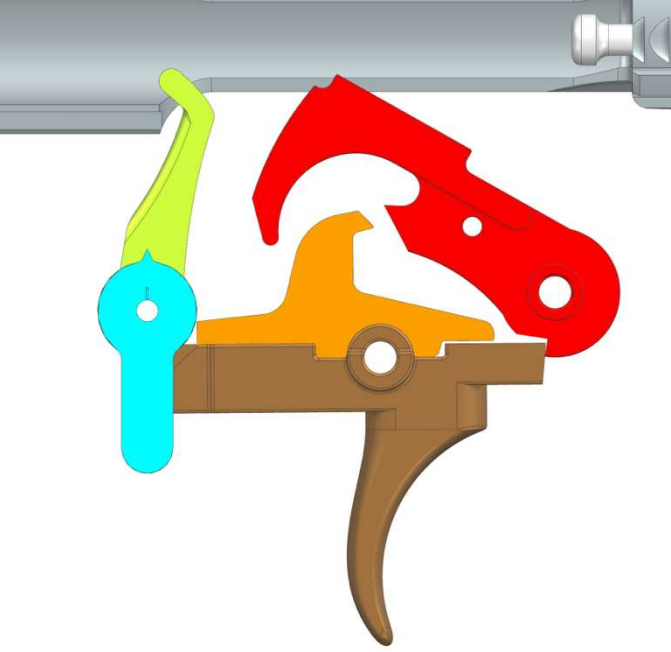
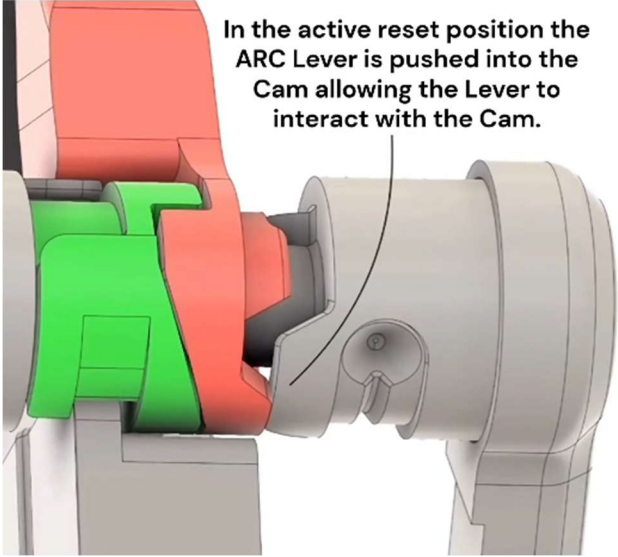
'247 Patent, Claim 15	The ARC-Fire
and are out of engagement in said released positions of said hammer and trigger member,	The sear of the trigger member (brown) and sear catch of the hammer (red) are out of engagement in the released position.  Trigger Member Released Position
said disconnecter having a hook for engaging said hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis,	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).  Disconnecter Hook Engaged

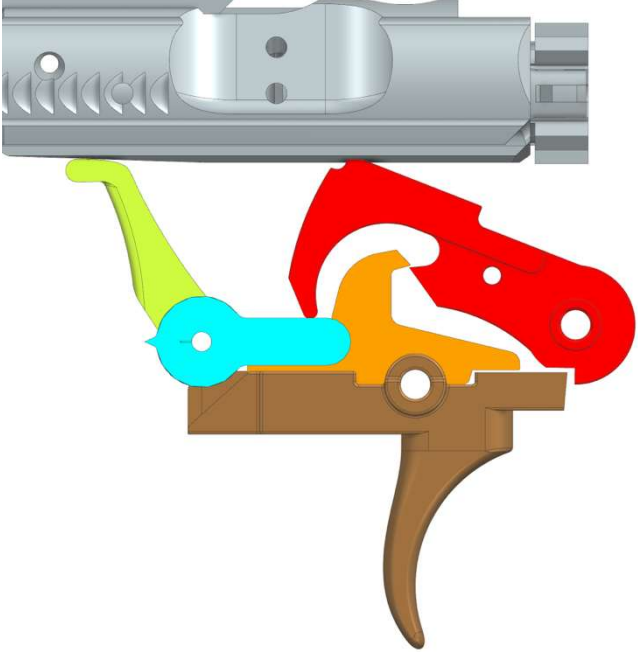
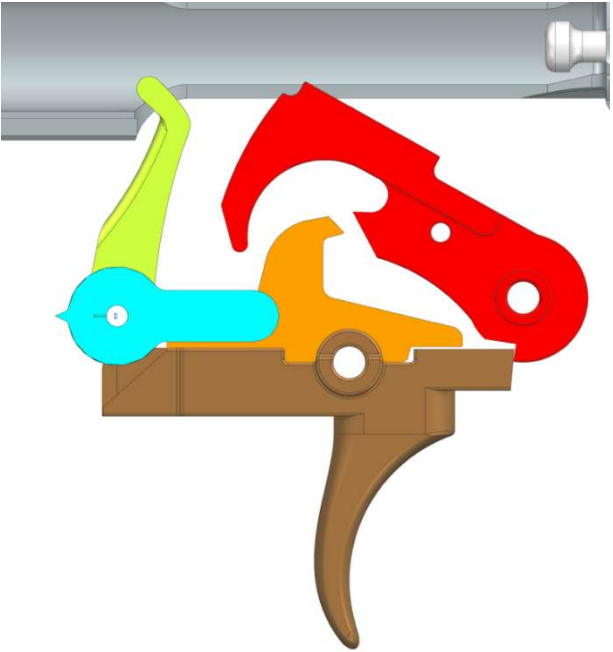
'247 Patent, Claim 15	The ARC-Fire
and a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,	The ARC-Fire (yellow/blue) has a lever (yellow) with a cam lobe that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting ARC-Fire, shown in (yellow/blue), in fire control mechanism pocket)  ARC-Fire Lever with Cam Lobe

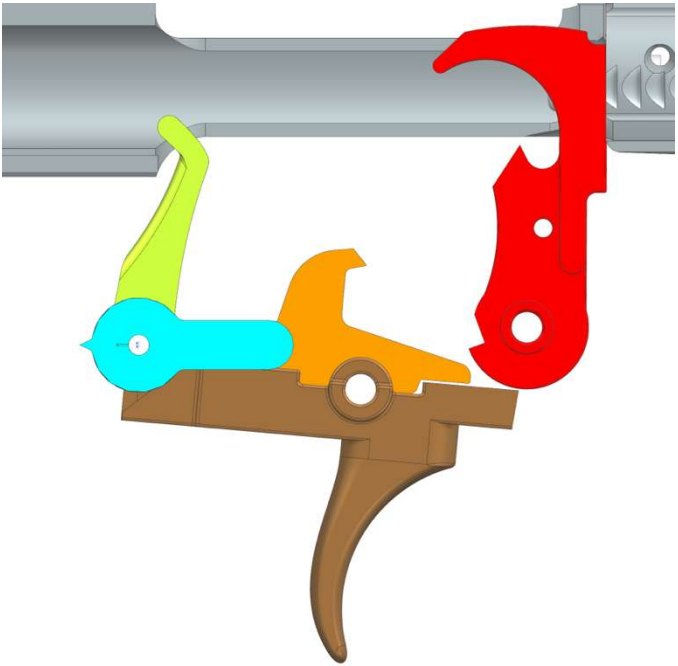
'247 Patent, Claim 15	The ARC-Fire
said cam being movable between a first position and a second position, in said second position said cam lobe forces said trigger member towards said set position,	The cam is movable between a first position and a second position.  Cam and Lobe First Position In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.  Cam and Lobe Second Position

'247 Patent, Claim 15	The ARC-Fire
whereupon in a standard semi-automatic mode,	During at least part of the cycle in the standard semi-automatic mode,  In the SEMI position, the ARC Lever will not engage the Cam as its rotated rearward leaving the Cam in the unlocked position.
said cam is in said first position,	. . . the cam is in the first position. 

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

'247 Patent, Claim 15	The ARC-Fire
at which time a user must manually release said trigger member to free said hammer from said disconnecter to permit said hammer and trigger member to pivot to said set positions so that the user can pull said trigger member to fire the firearm, and	. . . at which time a user must manually release the trigger member (brown) to free said 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. 
whereupon in a forced reset semi-automatic mode,	When in the "forced reset" semi-automatic mode,  In the active reset position the ARC Lever is pushed into the Cam allowing the Lever to interact with the Cam.

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

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

47. 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 M.A.R.C. and ARC-Fire.

48. 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.

49. 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 M.A.R.C. 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.

50. 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.

51. 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.

52. 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.

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

54. 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.

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

56. 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

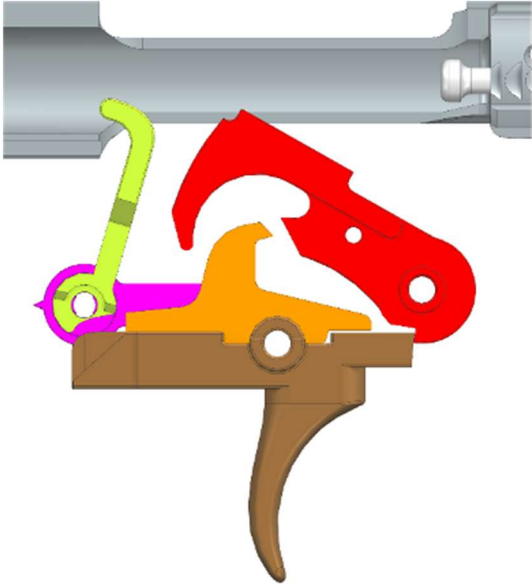
57. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

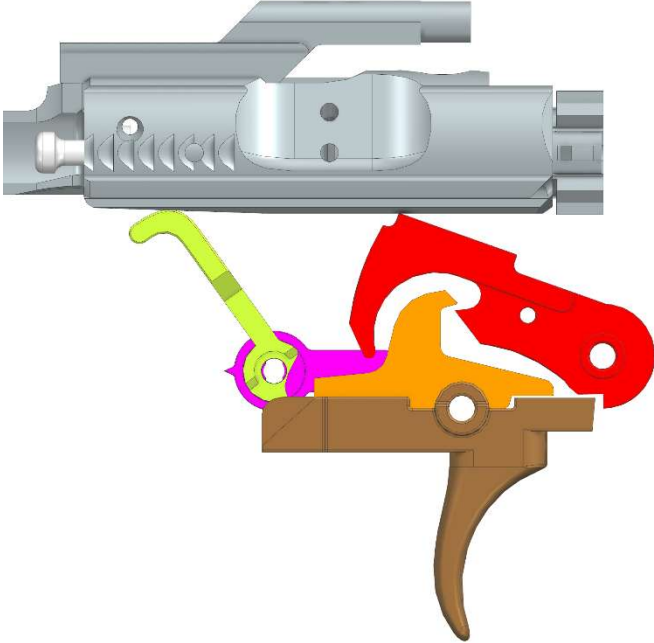
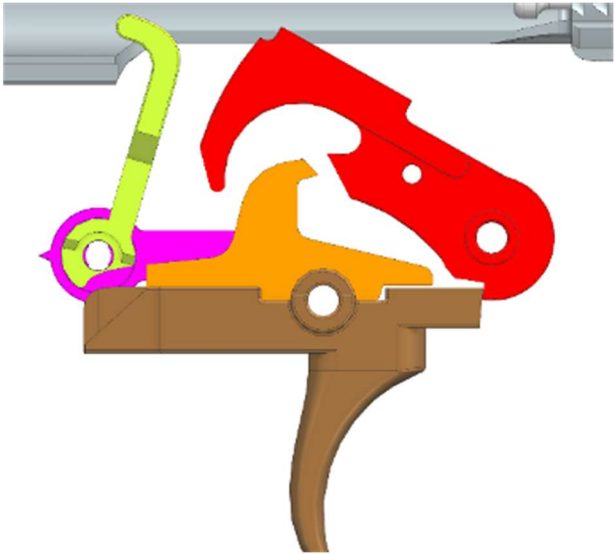
58. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using,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

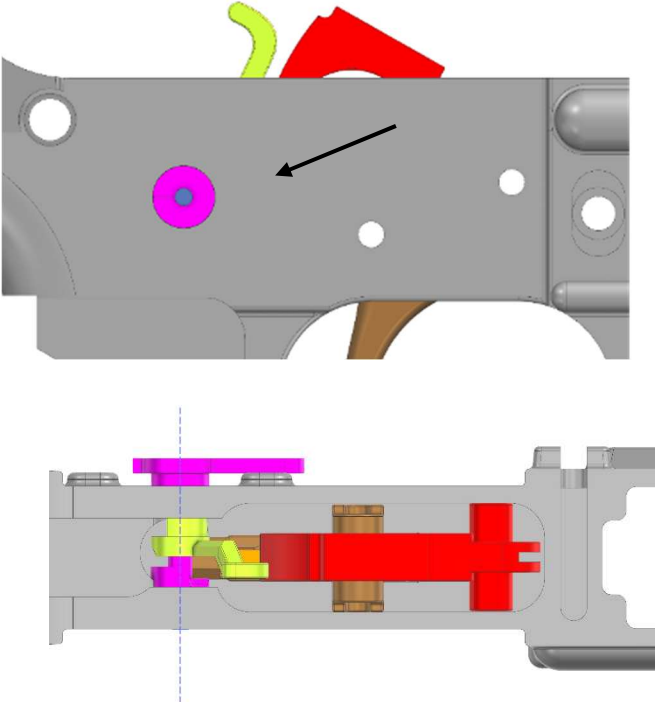
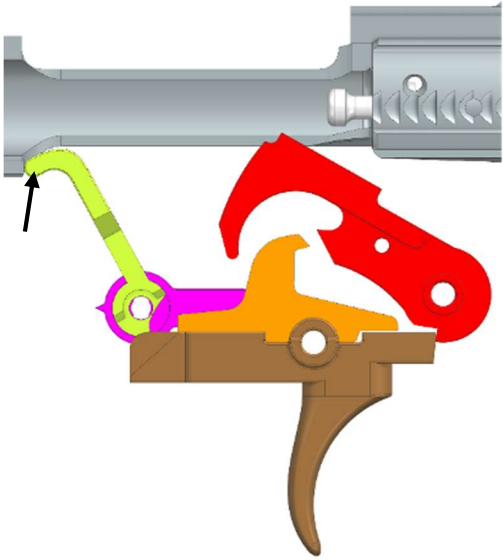
59. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

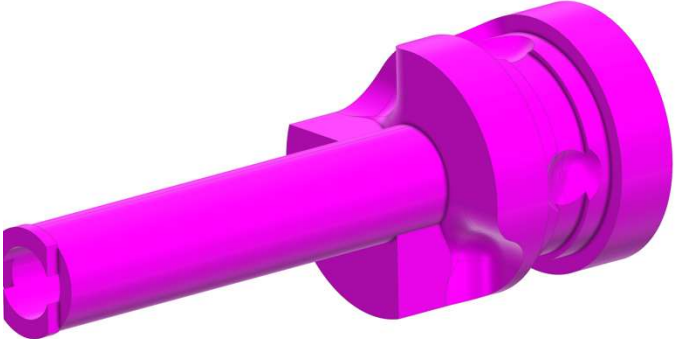
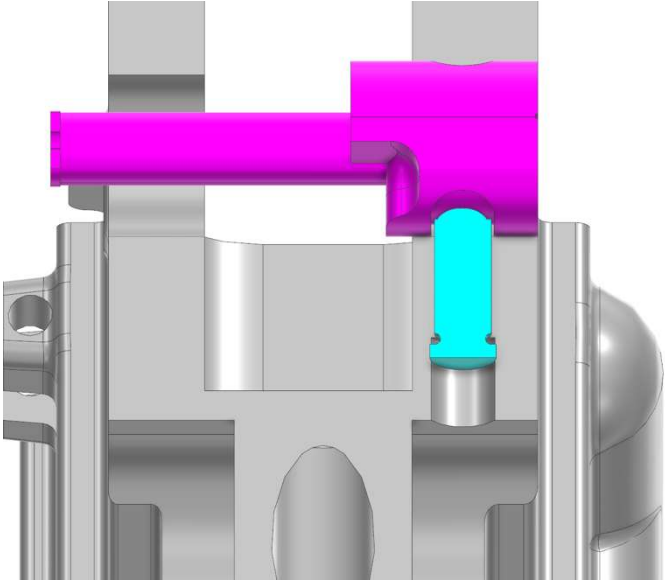
60. An exemplary comparison of the M.A.R.C., when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

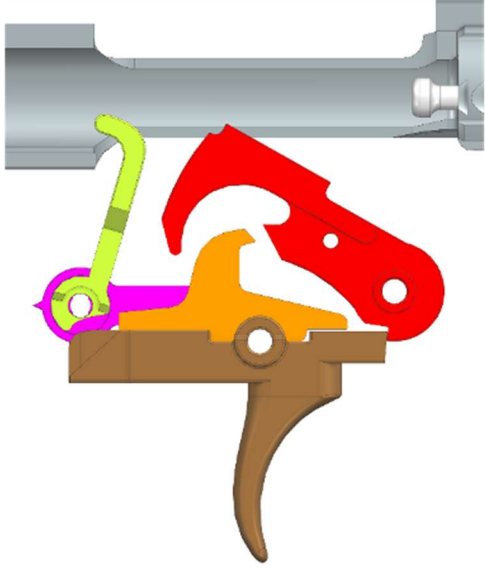
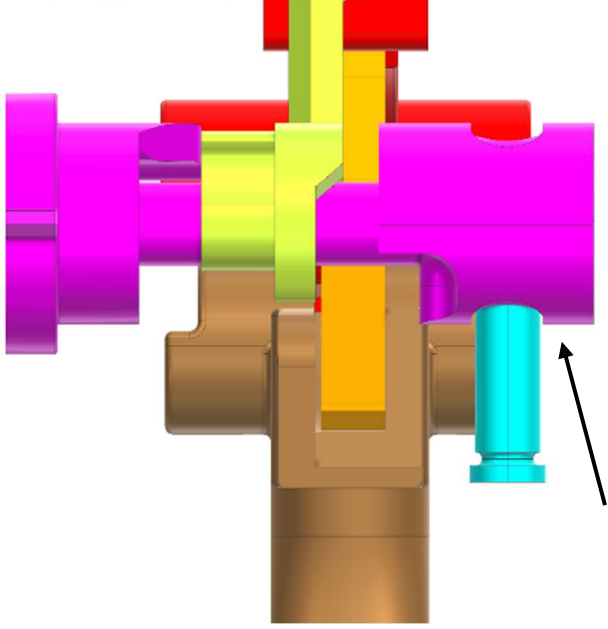
'784 Patent, Claim 1	The M.A.R.C.
1. In a forced reset trigger mechanism, an extended trigger member locking device, comprising:	When installed and used as directed, the M.A.R.C. is part of a trigger mechanism and functions as an extended trigger member locking device.

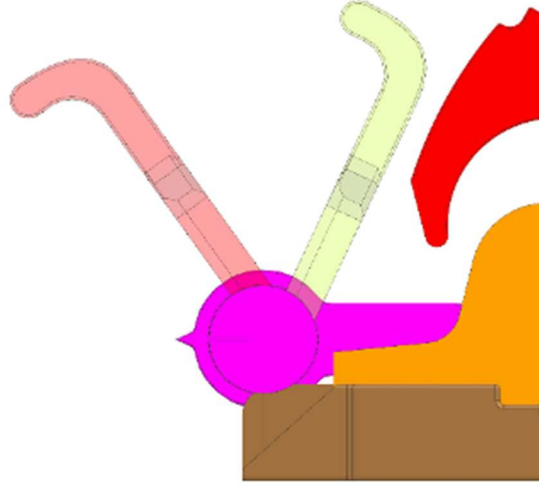
'784 Patent, Claim 1	The M.A.R.C.
	 M.A.R.C.  M.A.R.C. Installed (Plaintiff-generated renderings of M.A.R.C. here and below; Locking member and bolt carrier shown here and below in section view for clarity)
a locking member that is movable between a first position in which it locks a trigger against pulling movement	The M.A.R.C. 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 M.A.R.C.
	 Locked First Position
and a second position where it does not restrict movement of the trigger member,	The M.A.R.C. is moveable from the first position to a second position where it does not restrict movement of the trigger member.  Unlocked Second Position
the locking member configured to be movably supported by a frame	The M.A.R.C. is movably (pivotal) about the axis depicted below) supported by a frame (the lower receiver).

'784 Patent, Claim 1	The M.A.R.C.
	
and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,	The M.A.R.C. has an upward extending portion (yellow lever arm) configured to make actuating contact with a surface of the bolt carrier. 

'784 Patent, Claim 1	The M.A.R.C.
	 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)  Section View of Body Portion (purple), Lower Receiver (grey), and Detent (blue) Once installed, the body portion (purple) is movably supported by the lower receiver (grey) using the detent (blue).
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.

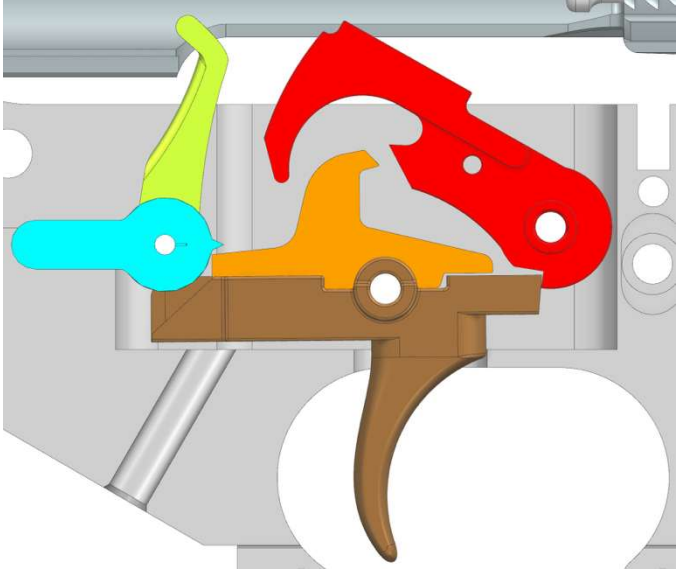
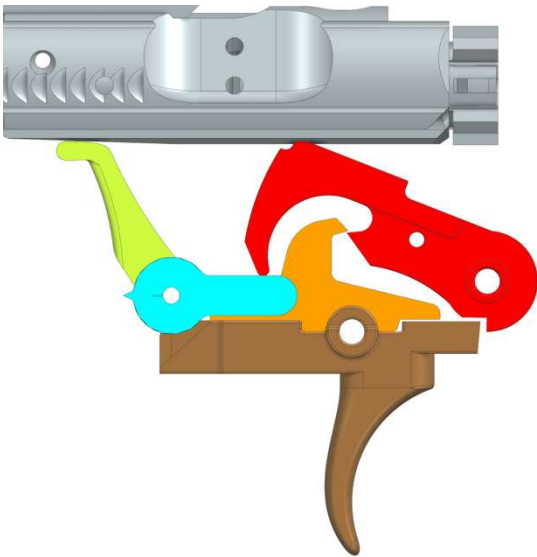
'784 Patent, Claim 1	The M.A.R.C.
	 Unlocked Second Position
the locking member having a body portion that is movably supported	The M.A.R.C. has a body portion (purple) that is movably supported by the lower receiver. 
and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position	The M.A.R.C. 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).

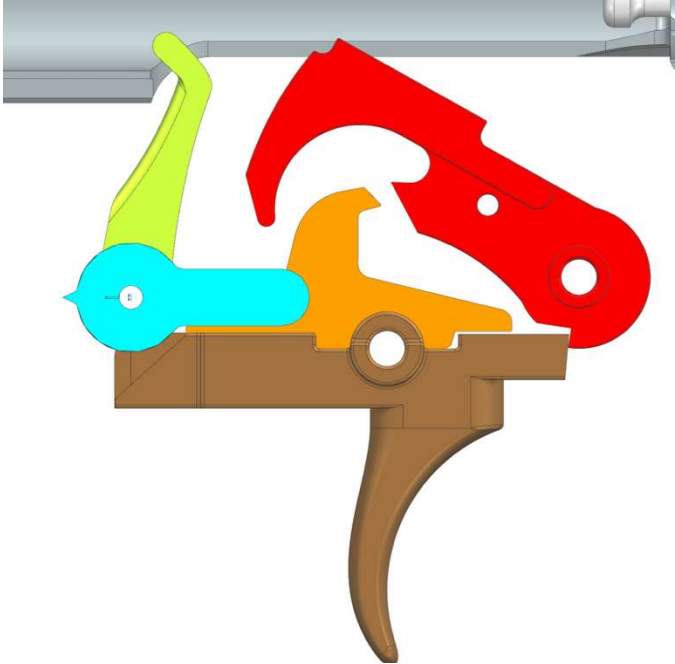
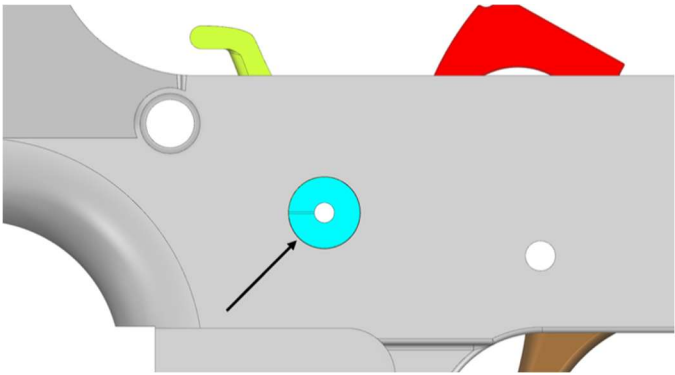
'784 Patent, Claim 1	The M.A.R.C.
	 Below illustrates the upward extending deflectable portion's (lever arm) total separate travel with an overlay of the lever in both positions without the body portion moving. 

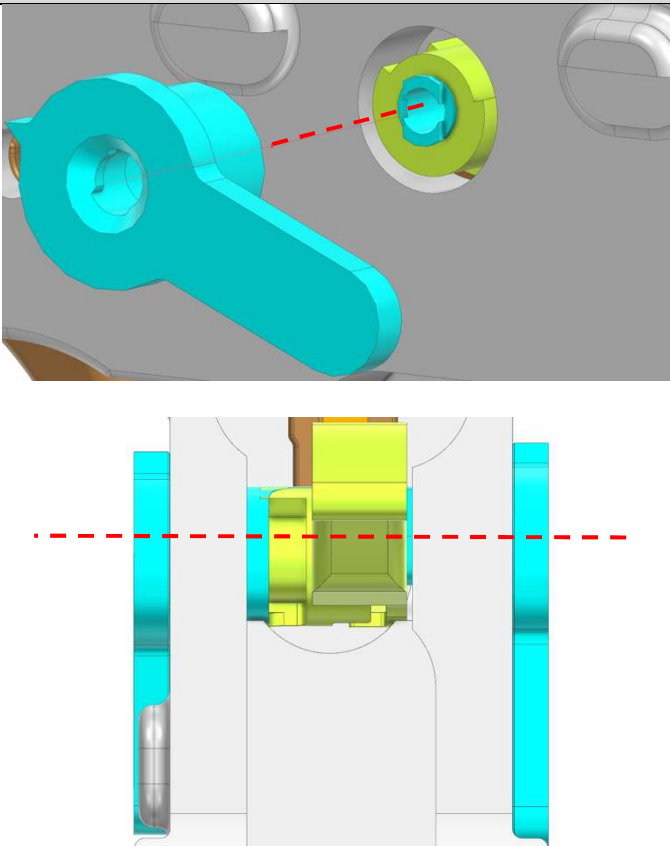
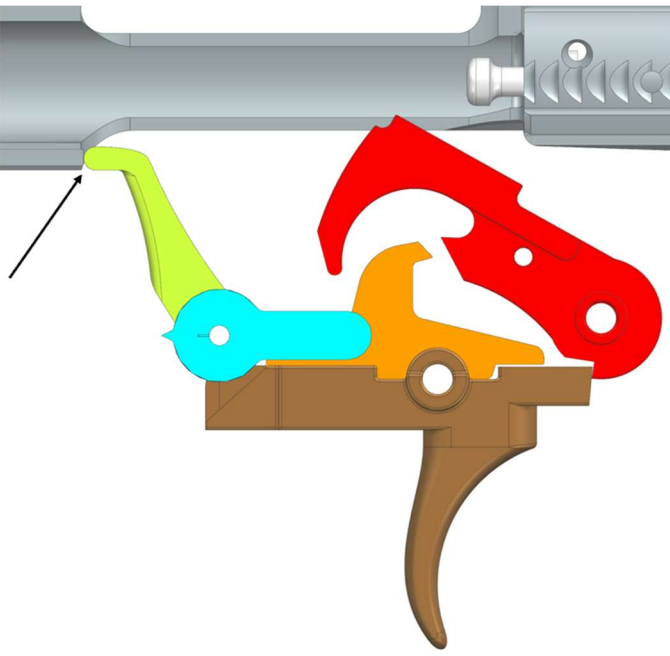
'784 Patent, Claim 1	The M.A.R.C.
and a deflected position.	The lever is now shown deflected independent of the body. 

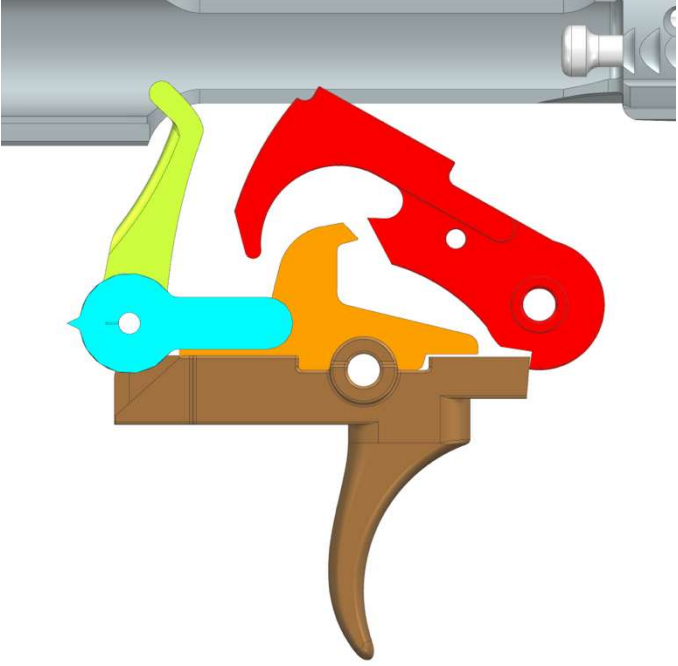
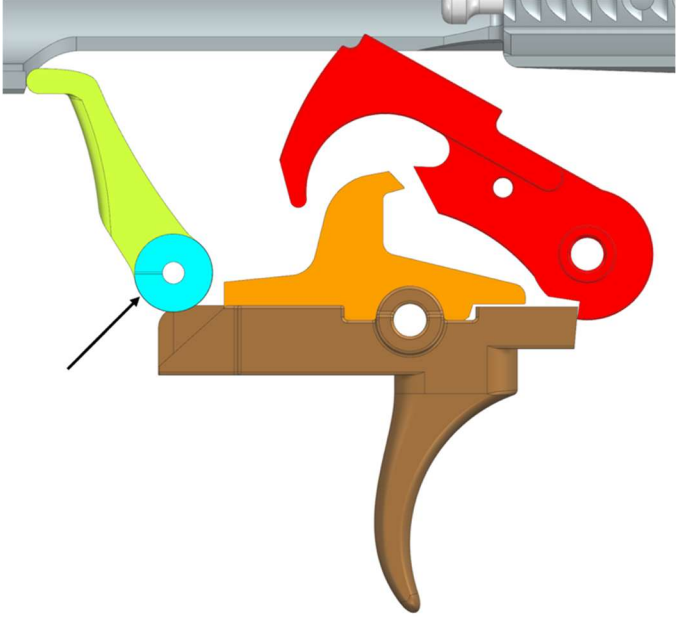
61. An exemplary comparison of the ARC-Fire, when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

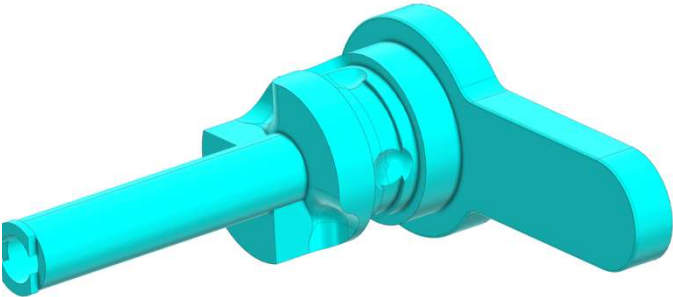
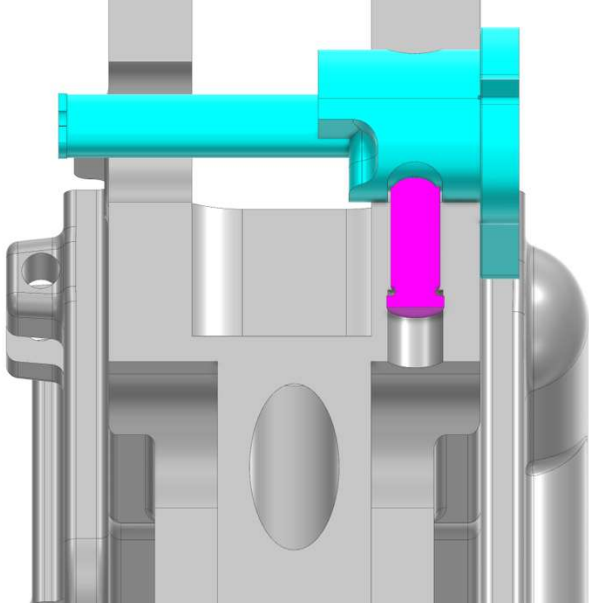
'784 Patent, Claim 1	The ARC-Fire
1. In a forced reset trigger mechanism, an extended trigger member locking device, comprising:	When installed and used as directed, the ARC-Fire is part of a trigger mechanism and functions as an extended trigger member locking device.  ARC-Fire

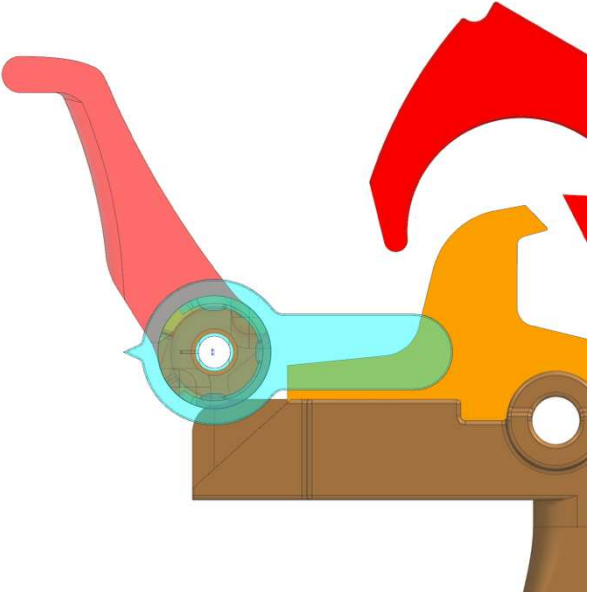
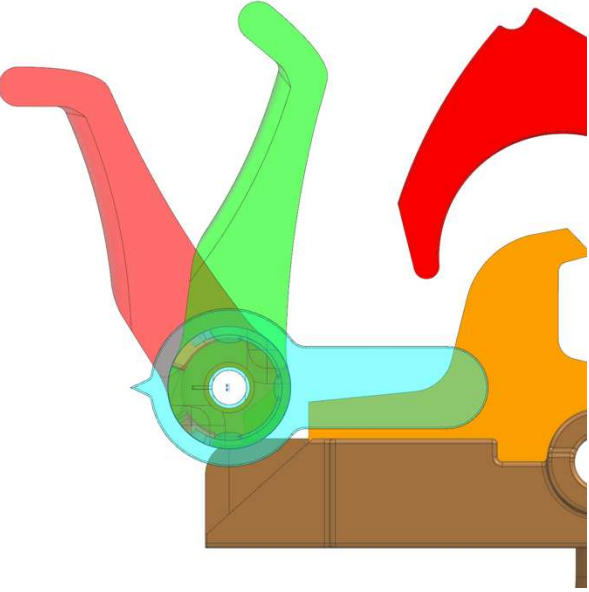
'784 Patent, Claim 1	The ARC-Fire
	 ARC-Fire Installed (Plaintiff-generated renderings of ARC-Fire here and below)
a locking member that is movable between a first position in which it locks a trigger against pulling movement	The ARC-Fire (yellow/blue) operates as a locking member and has a first position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

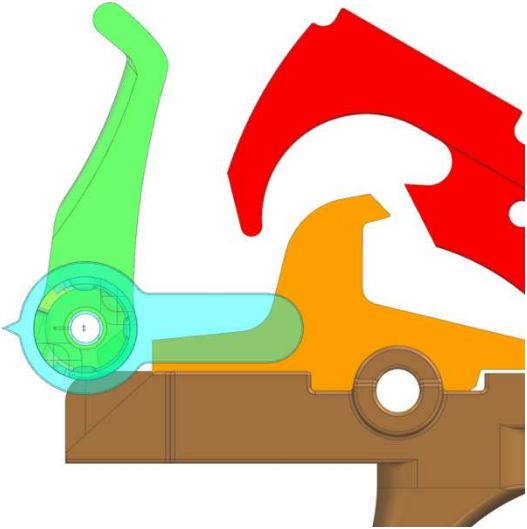
'784 Patent, Claim 1	The ARC-Fire
	 Unlocked Second Position
the locking member configured to be movably supported by a frame	The ARC-Fire (yellow/blue) is movably (pivotally about the axis depicted below) supported by a frame (the lower receiver).  Section View of Body Portion for Clarity

'784 Patent, Claim 1	The ARC-Fire
	
and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,	The ARC-Fire (yellow/blue) has an upward extending portion (yellow) configured to make actuating contact with a surface of the bolt carrier. 

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

'784 Patent, Claim 1	The ARC-Fire
	 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)  Once installed, the body portion (blue) is movably supported by the lower receiver (grey) using the detent (purple).
and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position	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).

'784 Patent, Claim 1	The ARC-Fire
	 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. 

'784 Patent, Claim 1	The ARC-Fire
and a deflected position.	The lever is now shown deflected independent of the body. 

62. 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 M.A.R.C. and ARC-Fire while selling products.

63. 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.

64. 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 M.A.R.C. 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.

65. 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.

66. 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.

67. 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.

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

69. 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.

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

71. 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 '159 PATENT

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

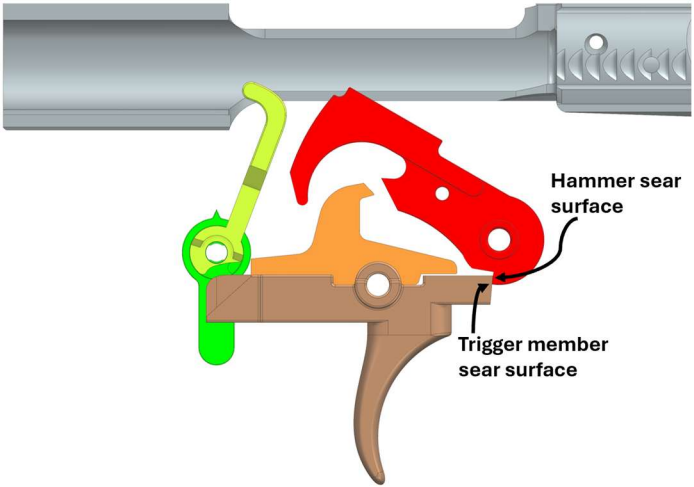
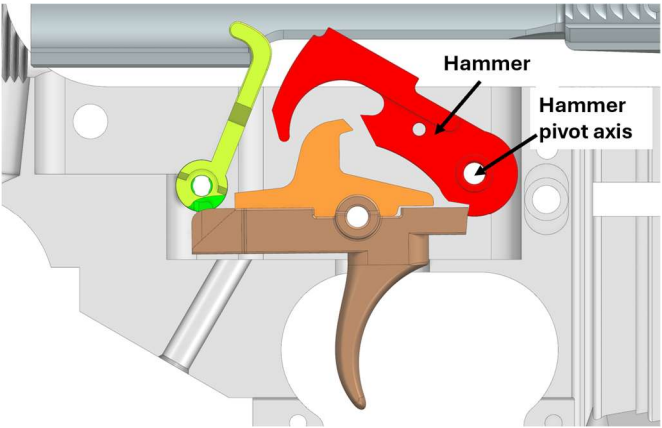
73. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, 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 M.A.R.C. and ARC-Fire.

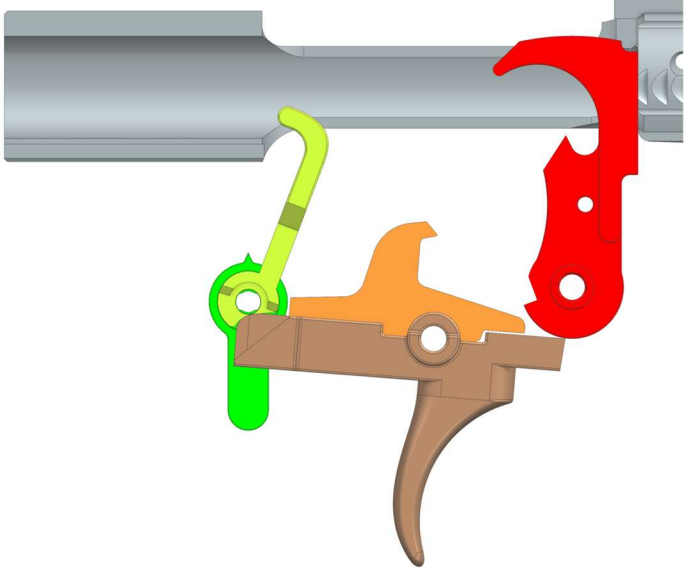
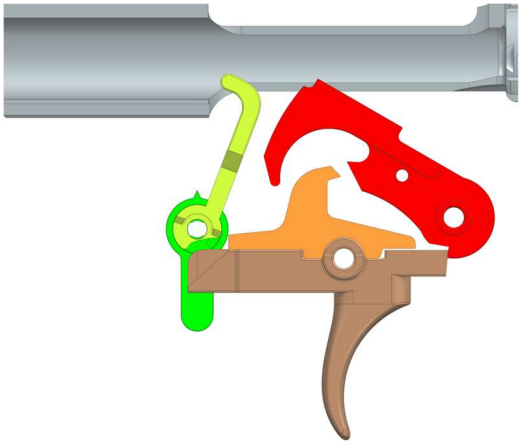
74. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

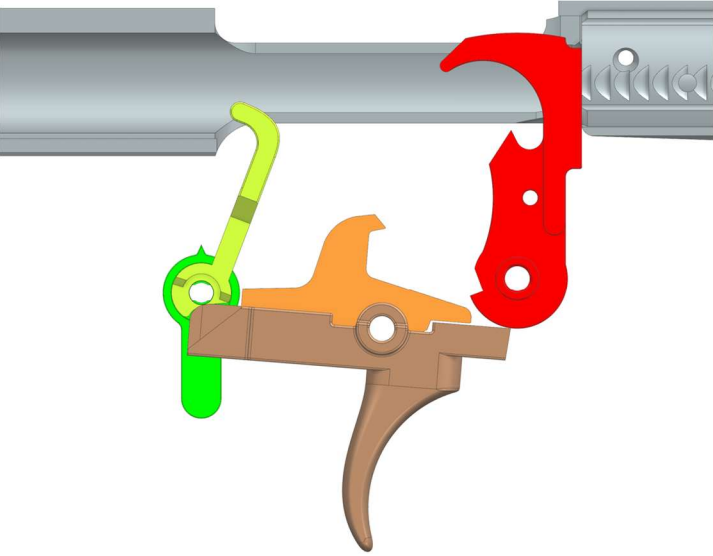
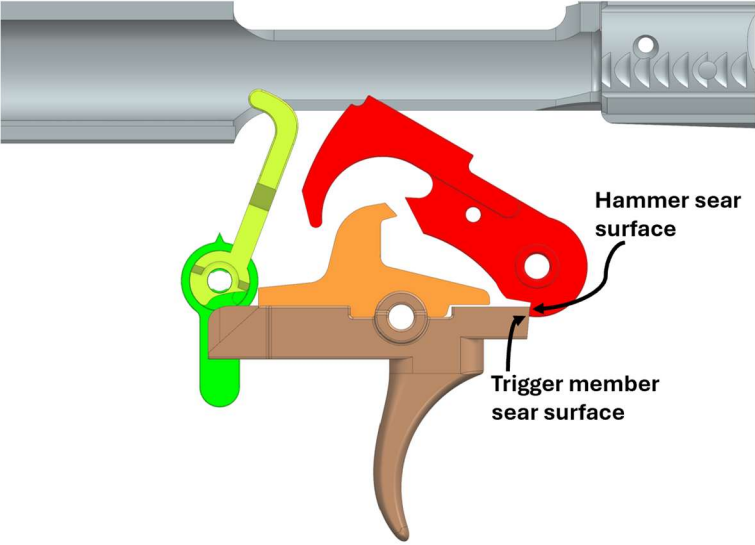
75. An exemplary comparison of the M.A.R.C., when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

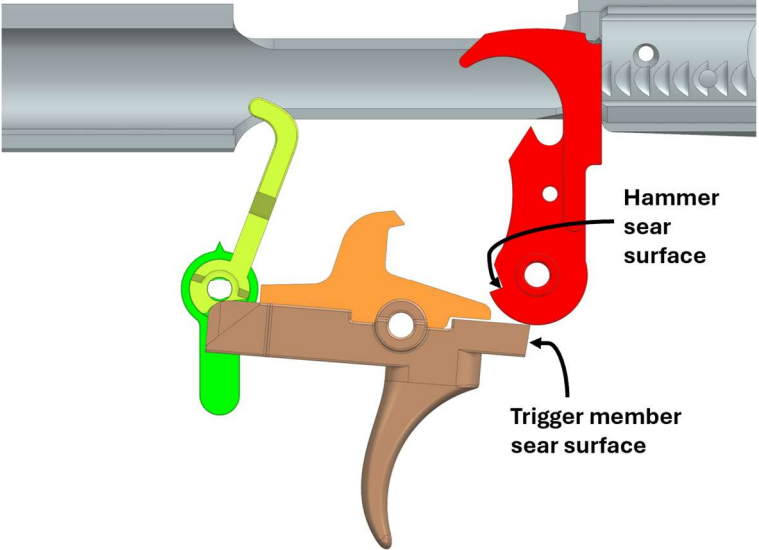
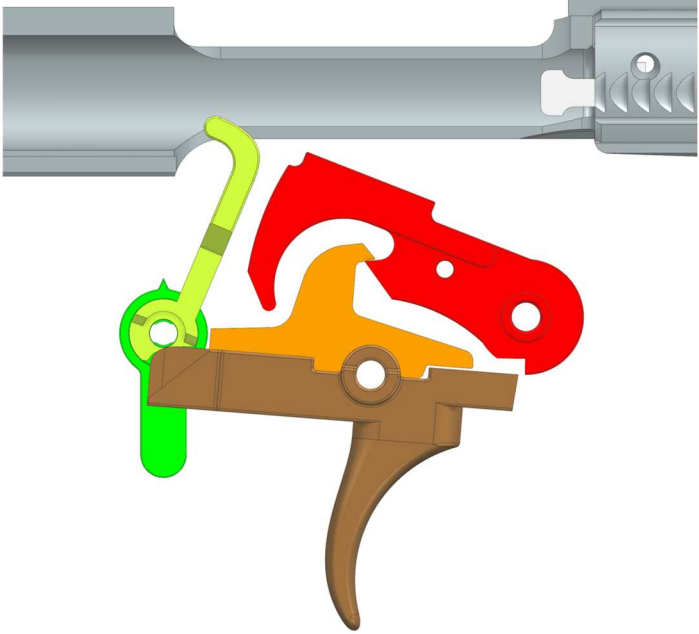
'159 Patent, Claim 1	The M.A.R.C.
1. A firearm trigger mechanism for a firearm having a fire control mechanism pocket and a reciprocating bolt means, the trigger mechanism operable in a first, standard semi-automatic mode and in a	When installed and used as directed, the M.A.R.C. is part of a firearm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

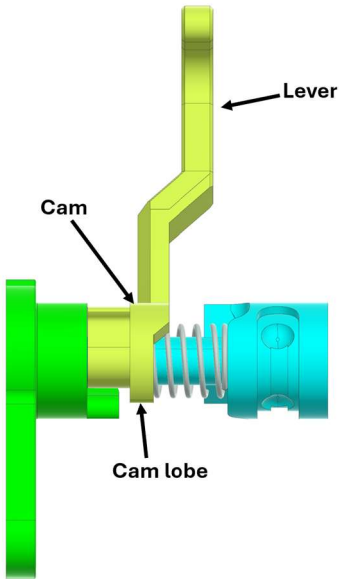
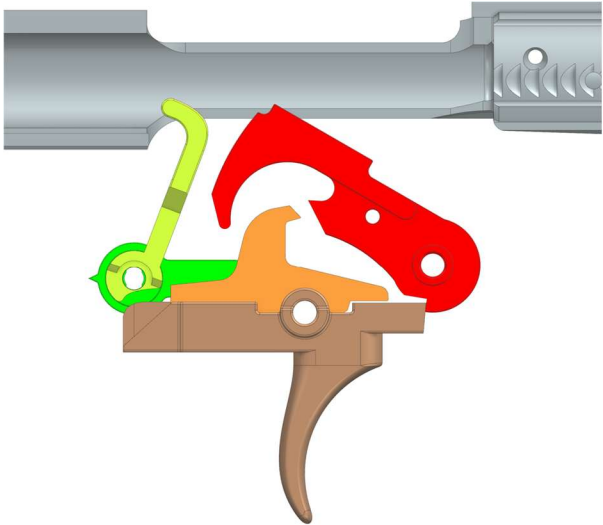
'159 Patent, Claim 1	The M.A.R.C.
second, forced reset semi-automatic mode, the mechanism comprising:	M.A.R.C. M.A.R.C. (Installed) (Plaintiff-generated renderings of the M.A.R.C. here and below)
a hammer having a sear surface and a hook for engaging a disconnector and adapted to be mounted in a fire control	The M.A.R.C. (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).

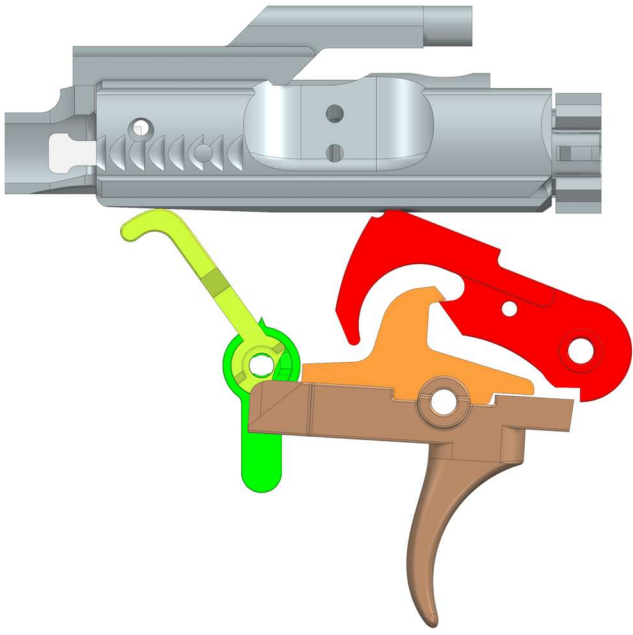
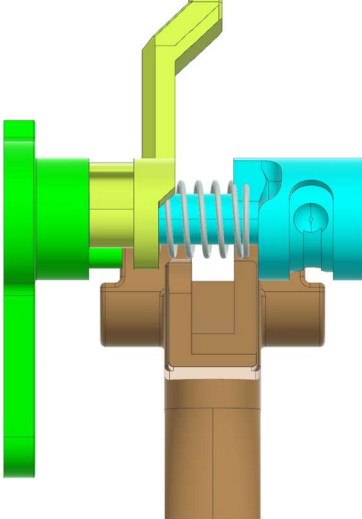
'159 Patent, Claim 1	The M.A.R.C.
mechanism pocket of a receiver	 Hammer sear surface Trigger member sear surface M.A.R.C. (Installed)
to pivot on a transverse hammer pivot axis between set and released positions, the hammer adapted to be pivoted rearward by rearward movement of a bolt means,	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt means.  Hammer Hammer pivot axis Hammer Set Position

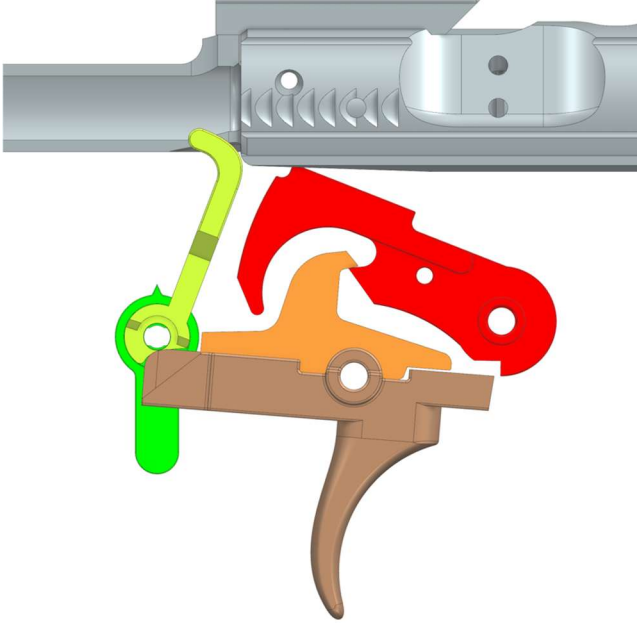
'159 Patent, Claim 1	The M.A.R.C.
	 Hammer Released Position
a trigger member having a trigger sear surface and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and	The M.A.R.C. (yellow) is installed with a trigger member (brown) 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.  Trigger Member Set Position

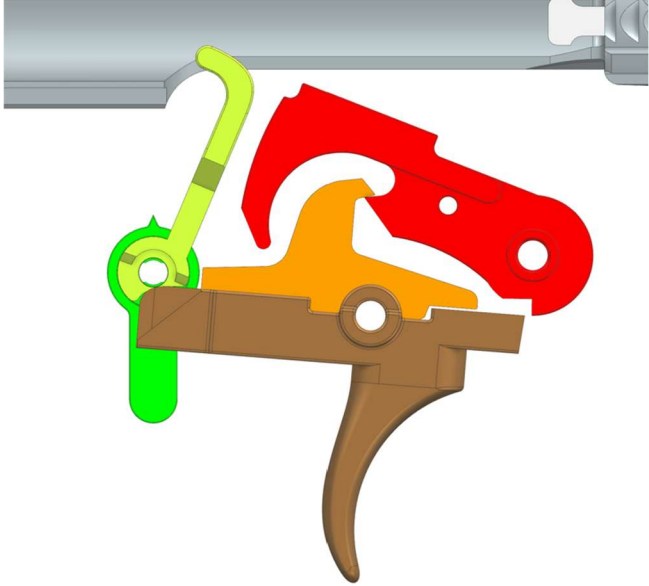
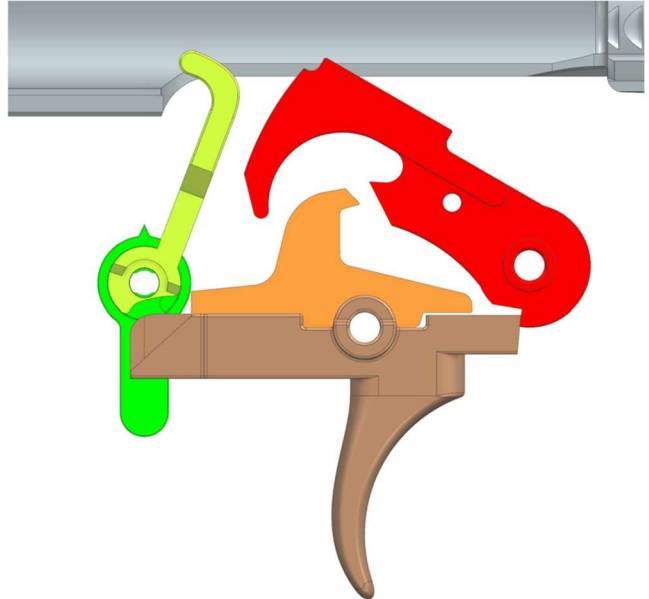
'159 Patent, Claim 1	The M.A.R.C.
released positions,	 Trigger Member Released Position
wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member	The sear surface of the trigger member (brown) and sear surface of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.  Trigger Member and Hammer Member Set Position
and are out of engagement in the released positions of the hammer and trigger member,	The sear surface of the trigger member (brown) and sear catch surface of the hammer (red) are out of engagement in the released position.

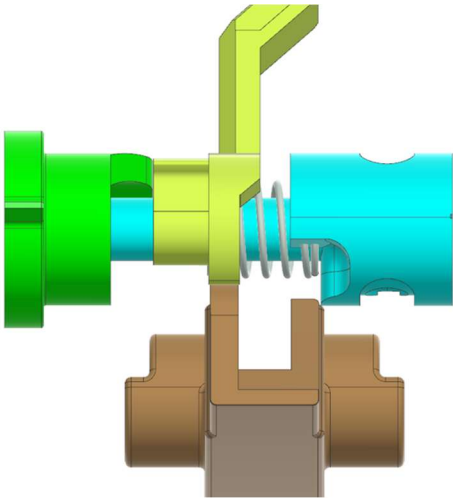
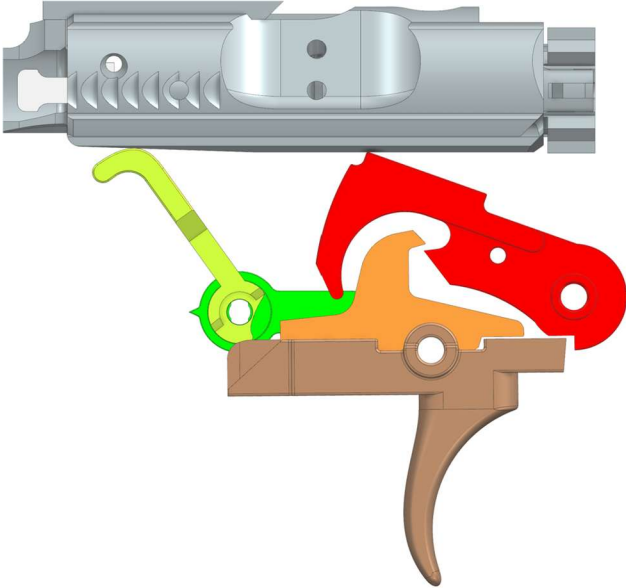
'159 Patent, Claim 1	The M.A.R.C.
	 Hammer sear surface Trigger member sear surface Trigger Member and Hammer Member Released Positions
the disconnecter having a hook for engaging the hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis, and	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).  Disconnecter Hook Engaged
a cam having a cam lobe and adapted to be	The M.A.R.C. has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (<i>See</i>

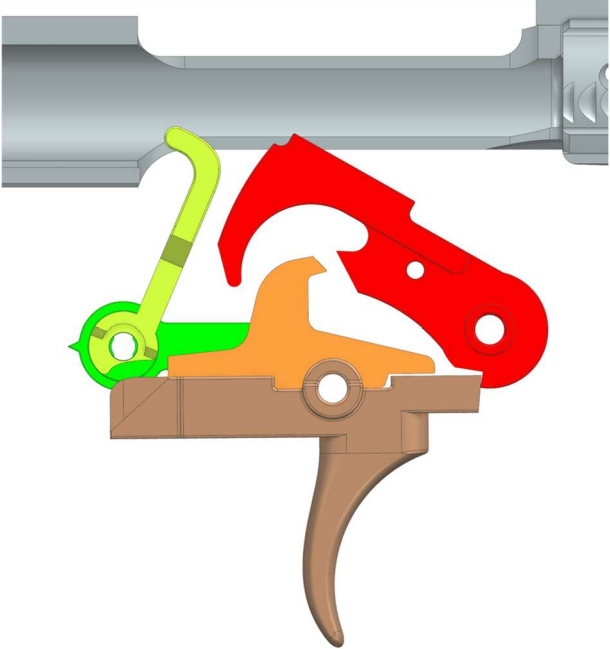
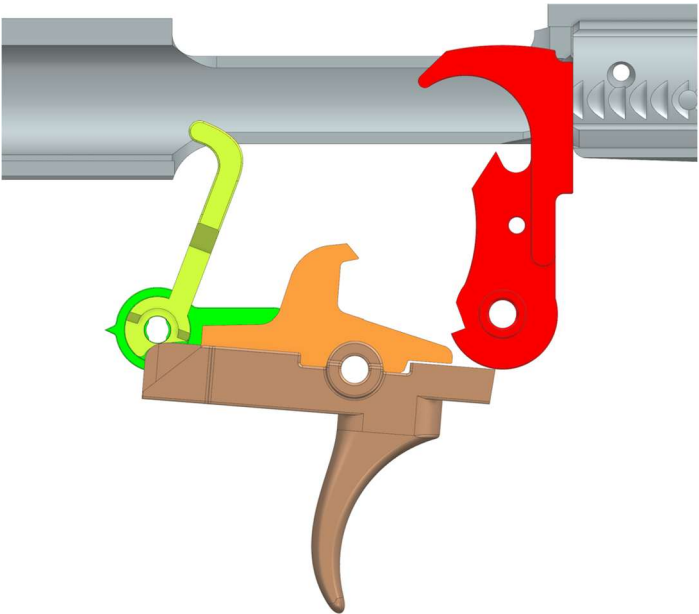
'159 Patent, Claim 1	The M.A.R.C.
movably mounted in the fire control mechanism pocket,	image above depicting M.A.R.C., shown in yellow, in fire control mechanism pocket)  M.A.R.C. Cam with Lobe and Lever
the cam being movable between a first position and a second position, in the second position the cam lobe forces the trigger member toward the set position,	The cam is movable between a first position and a second position.  Cam and Lobe First Position In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.

'159 Patent, Claim 1	The M.A.R.C.
	 Cam and Lobe Second Position
whereupon in the first mode, rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook,	While in the first (standard semi-automatic) mode,  Cam in the First (Semi-Automatic) Mode Rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.

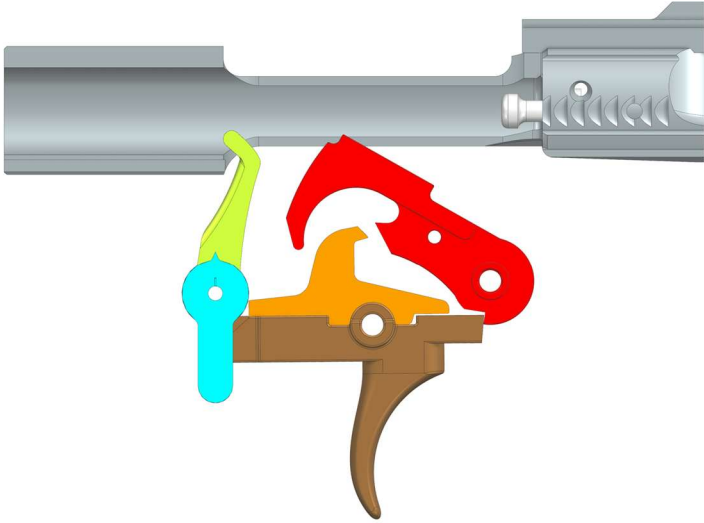
'159 Patent, Claim 1	The M.A.R.C.
	 Disconnector Hook Catches the Hammer
and thereafter the bolt means moves forward into battery,	Thereafter, the bolt means moves forward into battery, 

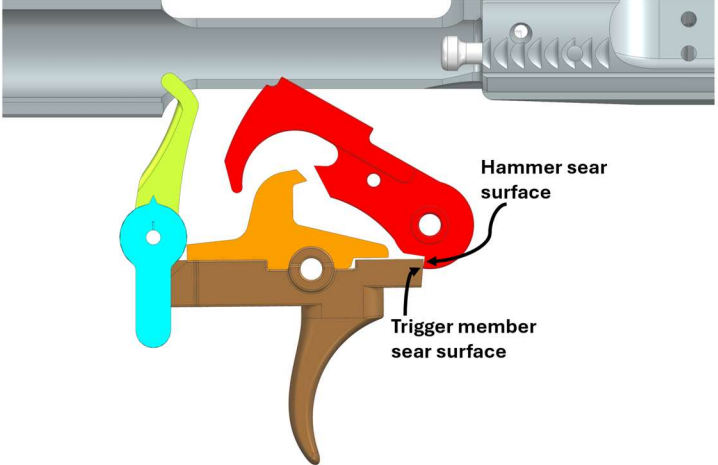
'159 Patent, Claim 1	The M.A.R.C.
	 Pressure on Trigger Member Prevents Reset
at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnecter to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm, and	... 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.  Reduced Pressure on Trigger Member Allows Reset)

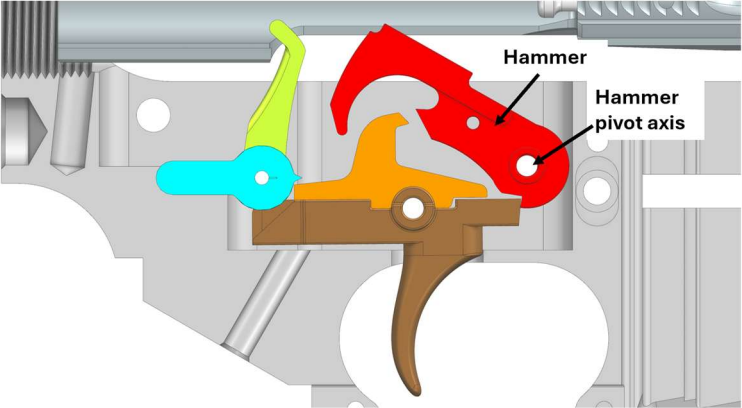
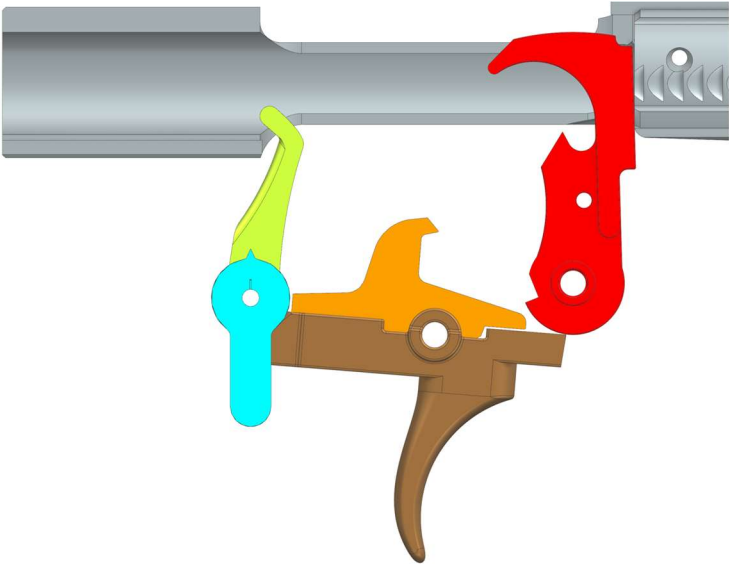
'159 Patent, Claim 1	The M.A.R.C.
whereupon in a second mode,	When in the second (“forced reset” semi-automatic) mode,  Cam in the Second (“Forced Reset” Semi-Automatic) Mode
rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook is prevented from holding the hammer,	Rearward movement of the bolt means causes rearward pivoting of the hammer (red) and the cam to move the trigger member toward the reset position such that the disconnecter (orange) hook is prevented from holding the hammer hook. 
and thereafter the bolt means moves forward into battery,	Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position,

'159 Patent, Claim 1	The M.A.R.C.
	
at which time the user can pull the trigger member to fire the firearm.	... 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. 

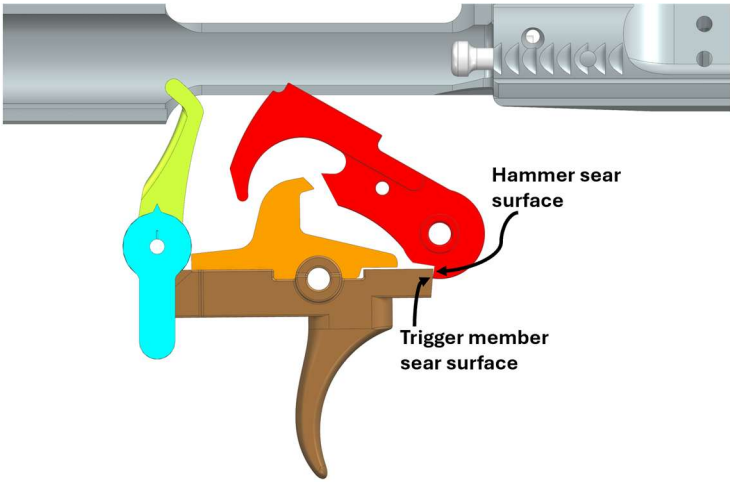
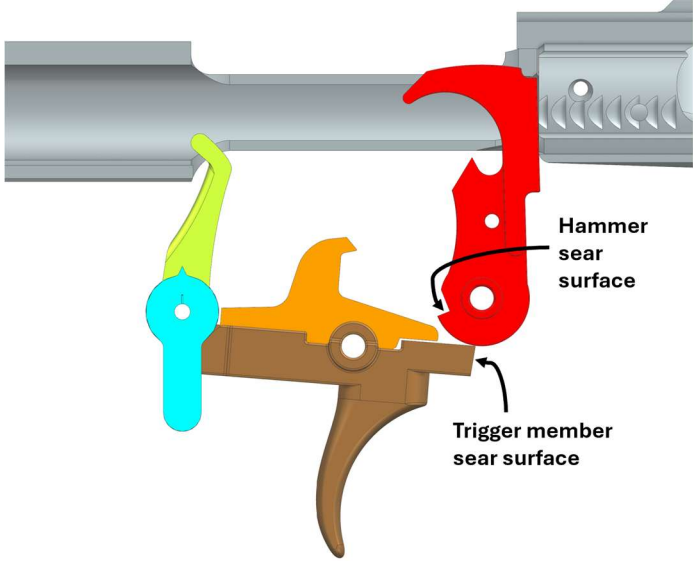
76. An exemplary comparison of the ARC-Fire, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

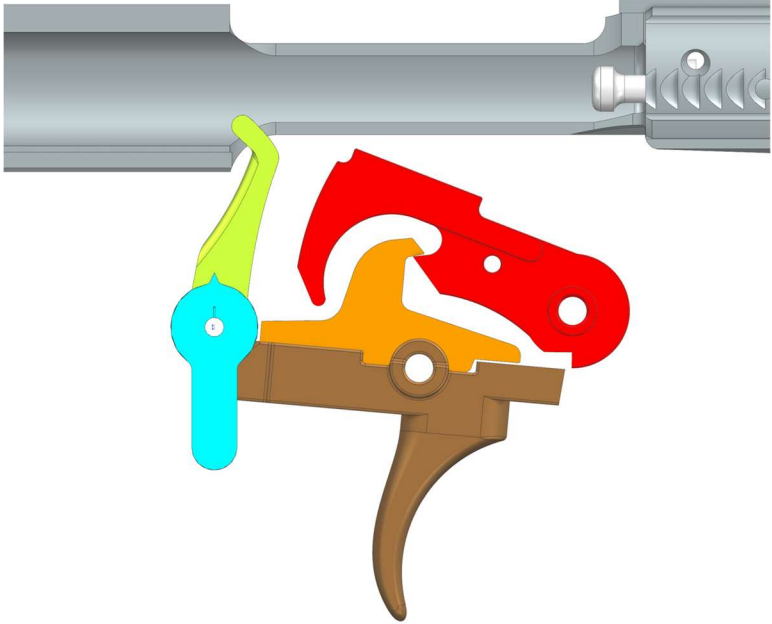
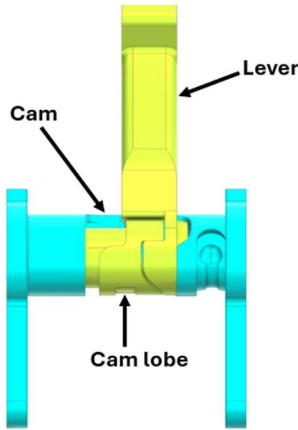
'159 Patent, Claim 1	The ARC-Fire
1. A firearm trigger mechanism for a firearm having a fire control mechanism pocket and a reciprocating bolt means, the trigger mechanism operable in a first, standard semi-automatic mode and in a second, forced reset semi-automatic mode, the mechanism comprising:	When installed and used as directed, the 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  ARC-Fire  ARC-Fire (Installed) (Plaintiff-generated renderings of ARC-Fire here and below)

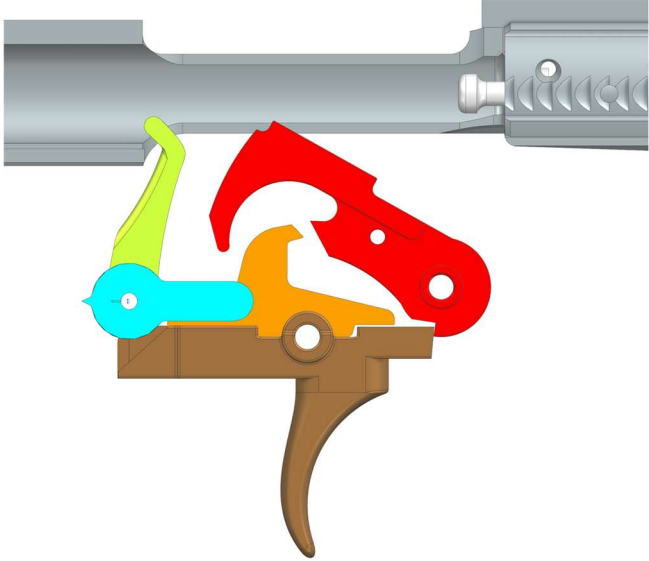
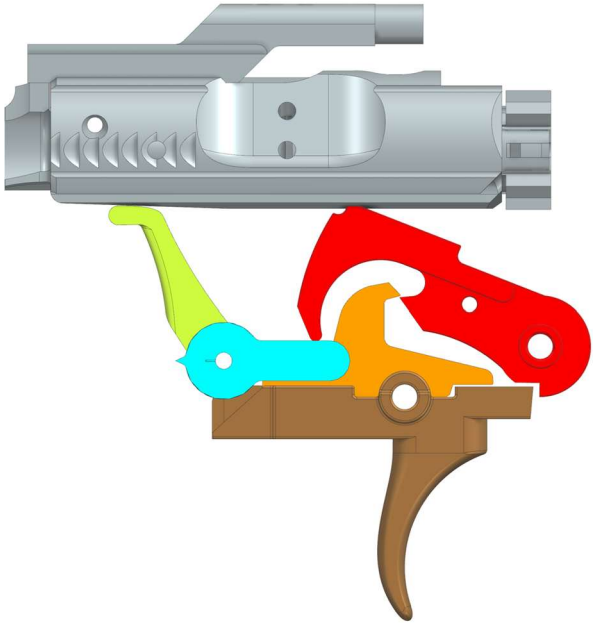
'159 Patent, Claim 1	The ARC-Fire
a hammer having a sear surface and a hook for engaging a disconnector and adapted to be mounted in a fire control mechanism pocket of a receiver	The ARC-Fire (yellow/blue) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear surface and a hook for engaging a disconnector (orange).  ARC-Fire (Installed)

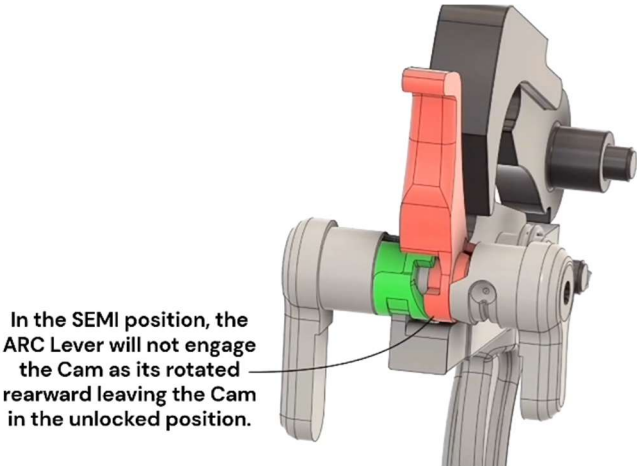
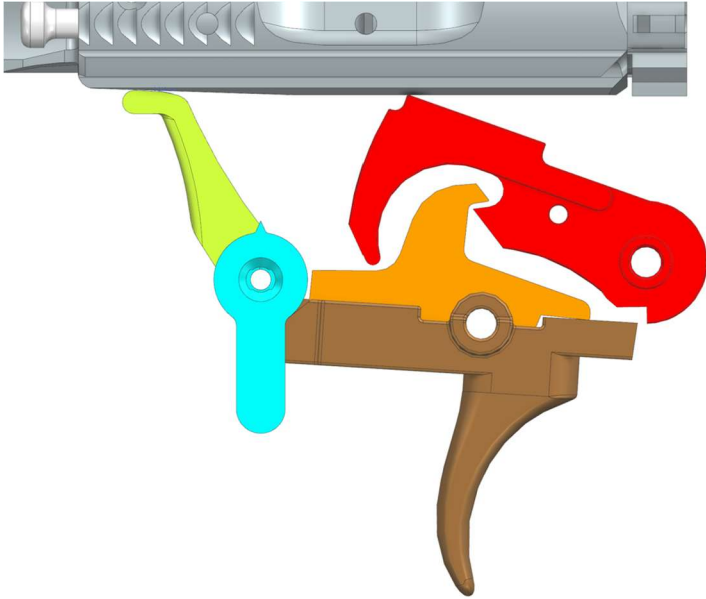
'159 Patent, Claim 1	The ARC-Fire
to pivot on a transverse hammer pivot axis between set and released positions, the hammer adapted to be pivoted rearward by rearward movement of a bolt means,	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt means.  The diagram shows a cross-section of a firearm's internal mechanism. A red hammer is in its set position, pivoted forward. It is connected to a yellow sear and a blue trigger. A brown bolt is visible to the right. Labels with arrows point to the 'Hammer' and the 'Hammer pivot axis'. Hammer Set Position  The diagram shows the same mechanism with the red hammer pivoted rearward, in its released position. The yellow sear and blue trigger are also shown in their respective positions. Hammer Released Position

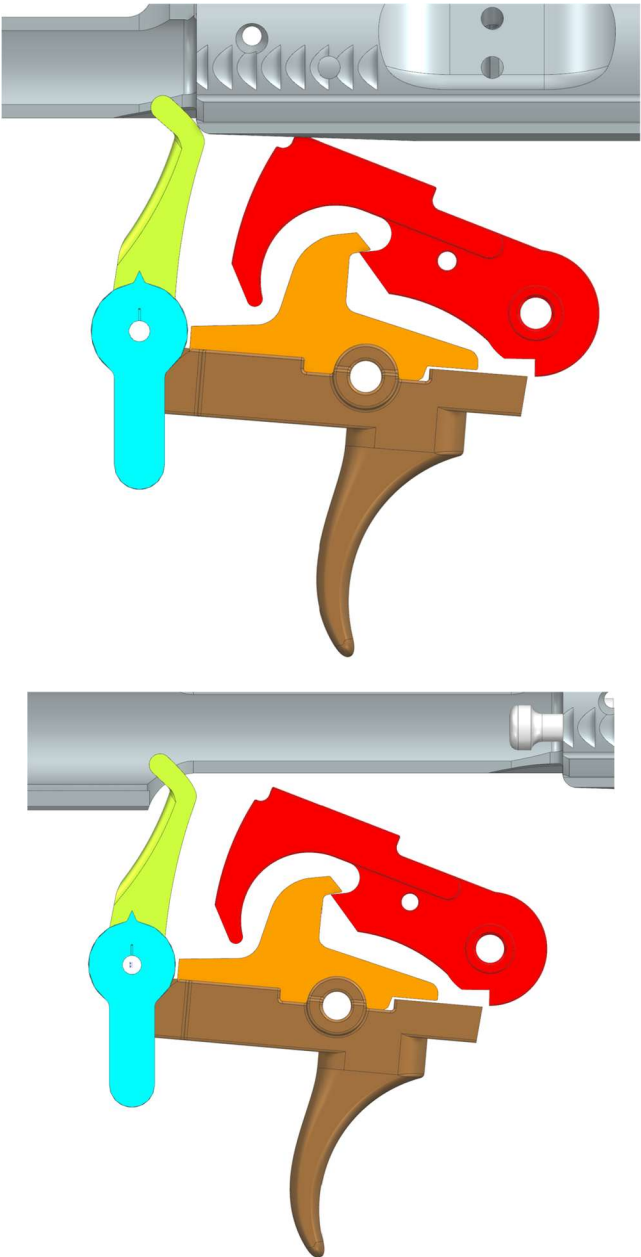
'159 Patent, Claim 1	The ARC-Fire
a trigger member having a trigger sear surface and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and released positions,	The ARC-Fire (yellow/blue) is installed with a trigger member (brown) 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. Trigger Member Set Position Trigger Member Released Position

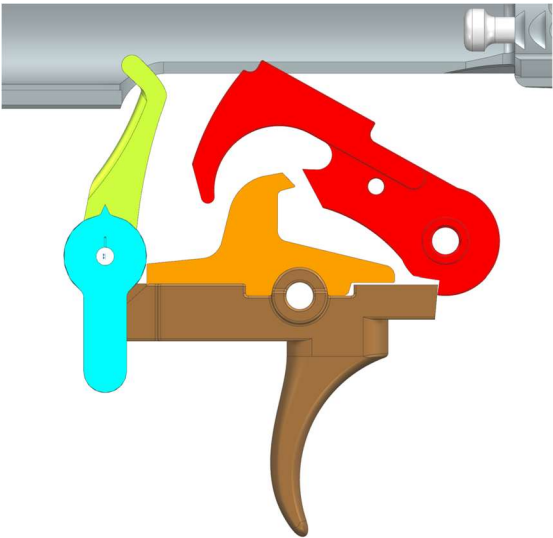
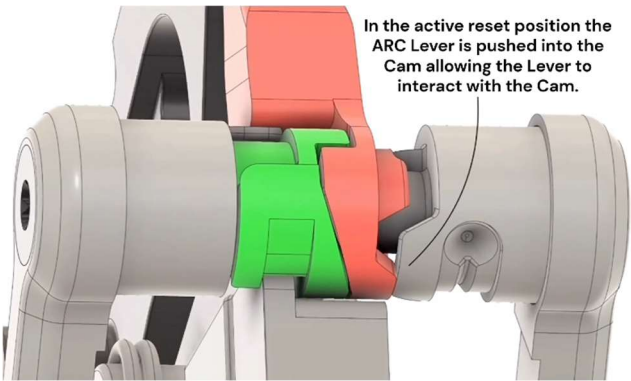
'159 Patent, Claim 1	The ARC-Fire
wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member	The sear surface of the trigger member (brown) and sear surface of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.  Trigger Member and Hammer Member Set Position
and are out of engagement in the released positions of the hammer and trigger member,	The sear surface of the trigger member (brown) and sear catch surface of the hammer (red) are out of engagement in the released position.  Trigger Member and Hammer Member Released Positions

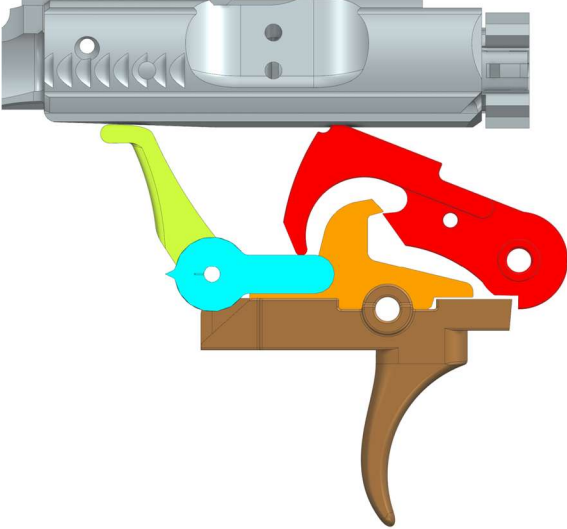
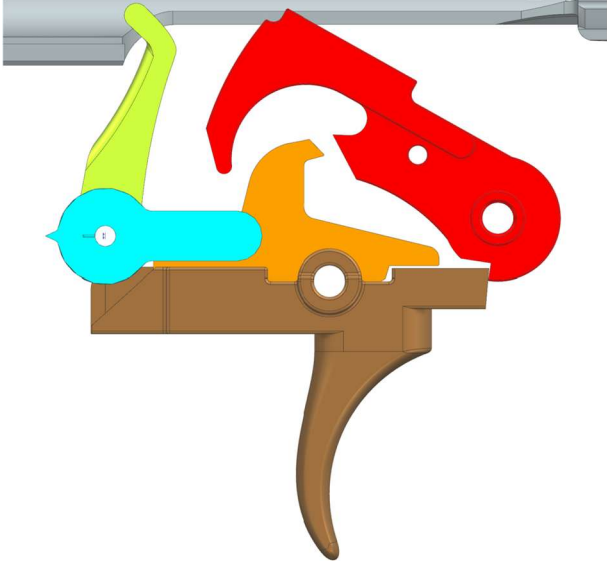
'159 Patent, Claim 1	The ARC-Fire
the disconnecter having a hook for engaging the hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis, and	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).  The diagram shows a cross-section of a firearm's fire control mechanism. A brown trigger is at the bottom. Above it is an orange disconnecter with a blue circular pivot point on its left. A red hammer is positioned above the orange disconnecter, with its hook engaged with the top of the orange disconnecter. A grey barrel is visible at the top. Disconnecter Hook Engaged
a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,	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. (<i>See image above depicting ARC-Fire, shown in yellow/blue, in fire control mechanism pocket</i>)  The diagram shows a cross-section of a cam mechanism. A yellow lever is mounted on a blue base. The lever has a curved top. Below the lever is a yellow cam with a lobe. Arrows point to the lever and the cam lobe. ARC-Fire Cam with Lobe and Lever

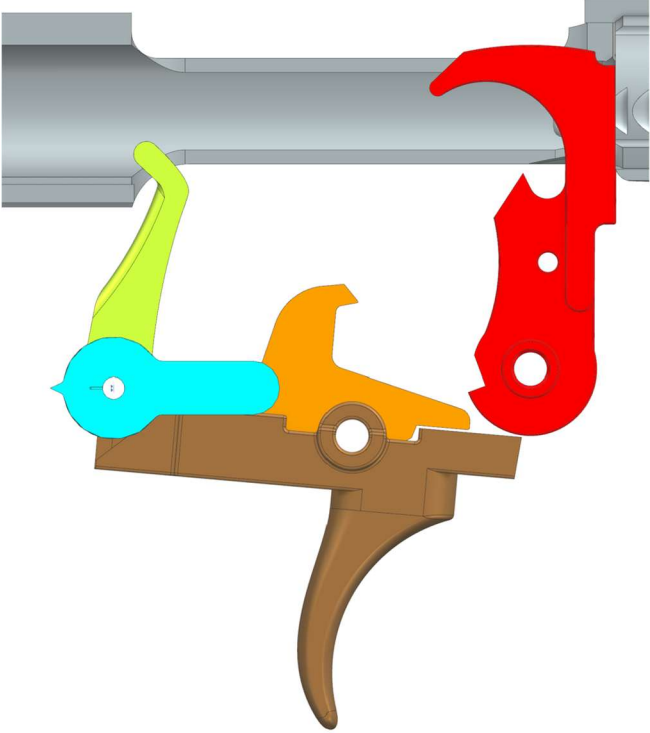
'159 Patent, Claim 1	The ARC-Fire
the cam being movable between a first position and a second position, in the second position the cam lobe forces the trigger member toward the set position,	The cam is movable between a first position and a second position.  Cam and Lobe First Position In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.  Cam and Lobe Second Position

'159 Patent, Claim 1	The ARC-Fire
whereupon in the first mode, rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook,	While in the first (standard semi-automatic) mode,  In the SEMI position, the ARC Lever will not engage the Cam as its rotated rearward leaving the Cam in the unlocked position. ... rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.  Disconnecter Hook Catches the Hammer

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

'159 Patent, Claim 1	The ARC-Fire
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 member to fire the firearm, and	. . . 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.  Reduced Pressure on Trigger Member Allows Reset
whereupon in a second mode,	When in the second (“forced reset” semi-automatic) mode, 

'159 Patent, Claim 1	The ARC-Fire
rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook is prevented from holding the hammer,	. . . rearward movement of the bolt means causes rearward pivoting of the hammer (red) and the cam to move the trigger member toward the reset position such that the disconnecter (orange) hook is prevented from holding the hammer hook. 
and thereafter the bolt means moves forward into battery,	Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position, 

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

77. 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 M.A.R.C. and ARC-Fire while selling products.

78. 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.

79. 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 M.A.R.C. 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.

80. 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.

81. 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.

82. 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.

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

84. 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.

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

86. 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 '403 PATENT

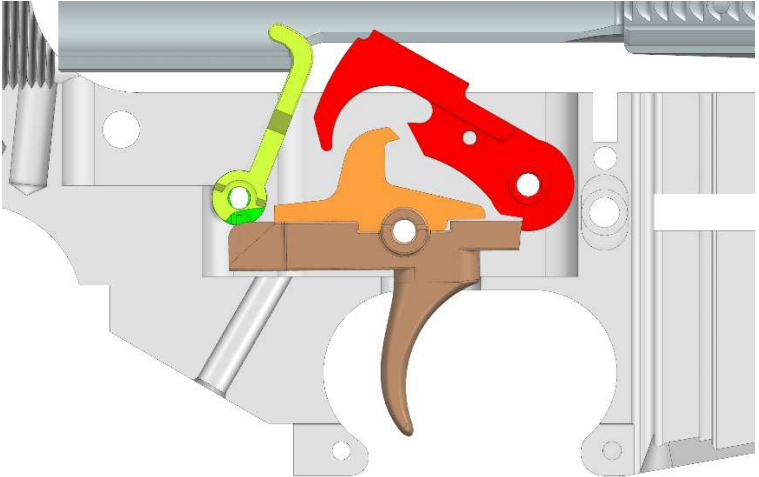
87. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

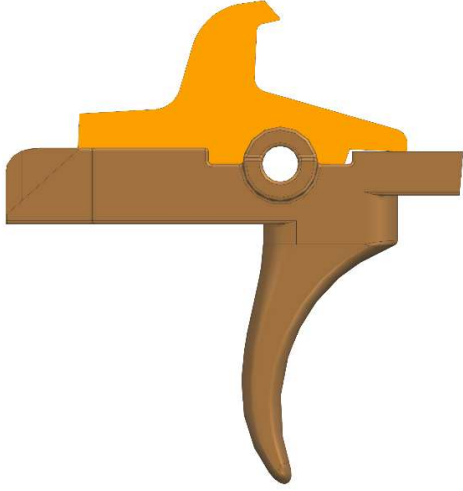
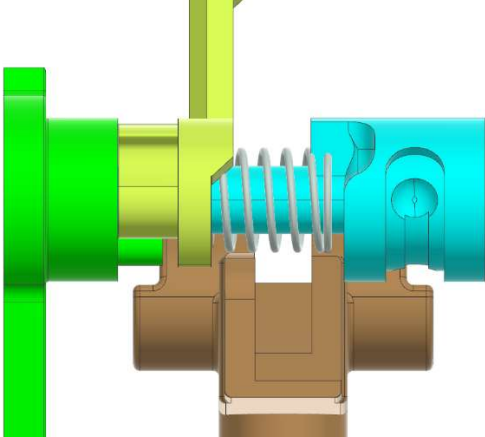
88. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '403 patent, including but not limited to claim 38, literally and/or under the doctrine of equivalents, by among other things, making, using,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

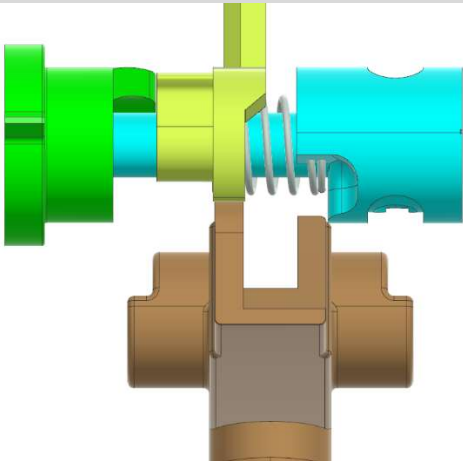
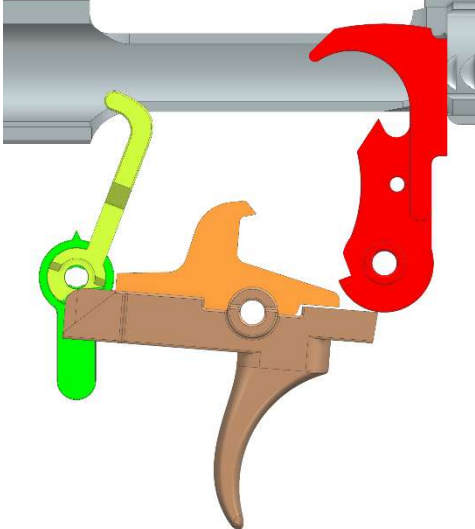
89. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '403 patent, including but not limited to claim 38, literally and/or under the doctrine of equivalents.

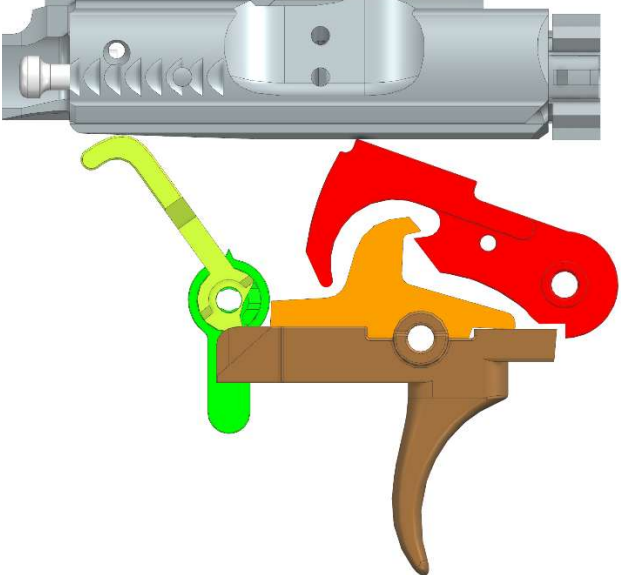
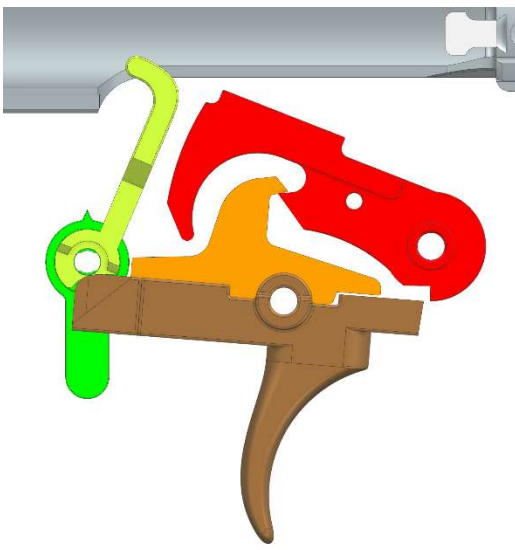
90. An exemplary comparison of the M.A.R.C., when assembled and used as intended, with claim 38 of the '403 Patent is illustrated in the chart below:

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

'403 Patent, Claim 38	The M.A.R.C.
	 M.A.R.C.
a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;	The M.A.R.C. (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.  M.A.R.C. (Installed) (Plaintiff-generated renderings of M.A.R.C. here and below)
a disconnecter having a disconnecter hook and adapted to pivot on a transverse disconnecter pivot axis; a trigger member; and	The M.A.R.C. 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).

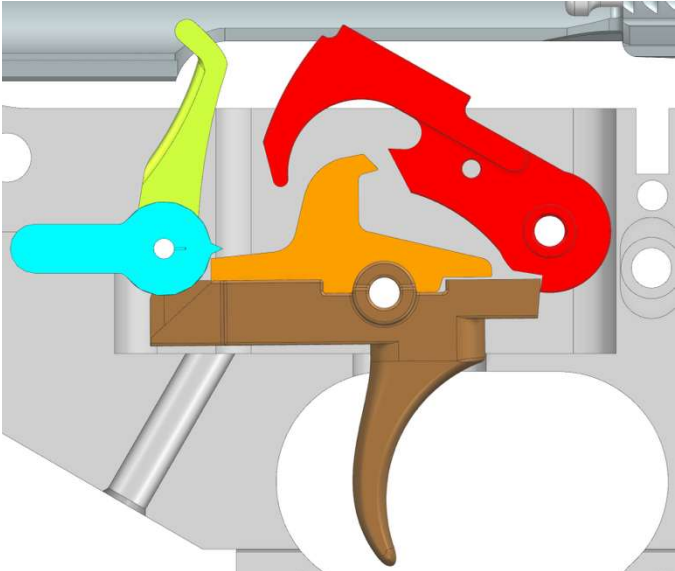
'403 Patent, Claim 38	The M.A.R.C.
	 Disconnecter and Trigger Member
a safety selector adapted to be movable between a standard semi-automatic position and a forced reset semi-automatic position,	The M.A.R.C. is a safety selector adapted to be movable between a standard semi-automatic position,  M.A.R.C. (installed) in Standard Semi-Automatic Position . . . and a “forced reset” semi-automatic position,

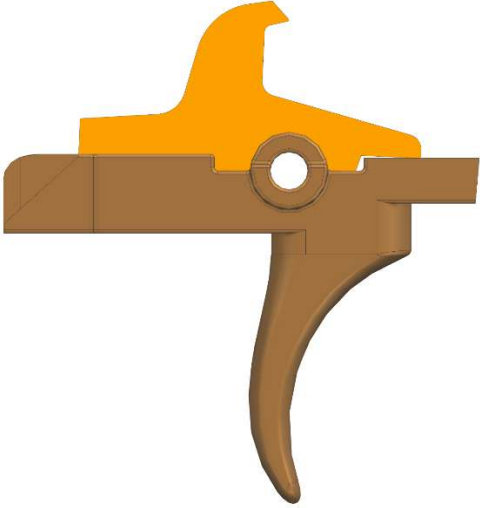
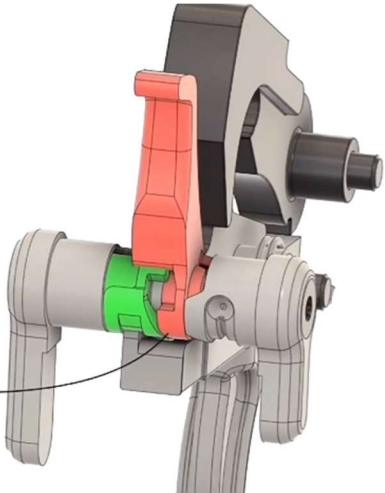
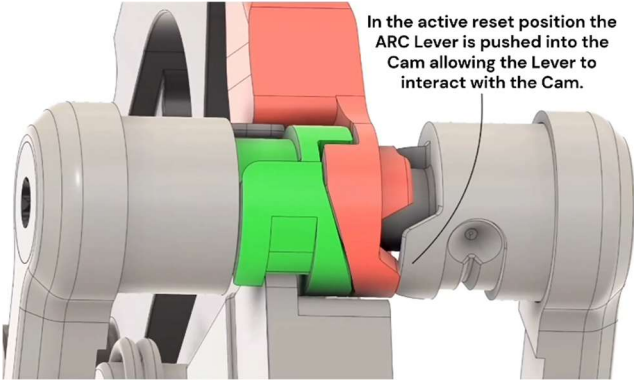
'403 Patent, Claim 38	The M.A.R.C.
	 M.A.R.C. (installed) in "Forced Reset" Semi-Automatic Position
wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,	When safety selector is in the standard semi-automatic position the trigger member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

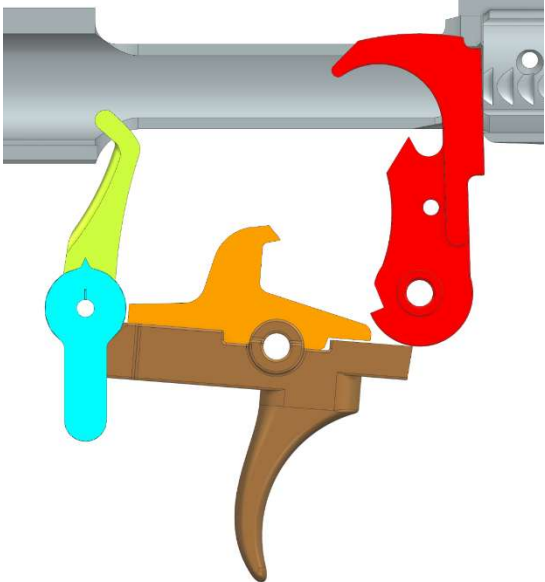
'403 Patent, Claim 38	The M.A.R.C.
	
rearward pressure on the trigger member must be reduced to permit the trigger member to then be actuated to fire a firearm.	Rearward pressure on the trigger member (brown) must be reduced to permit the trigger member to then be actuated to fire a firearm. 

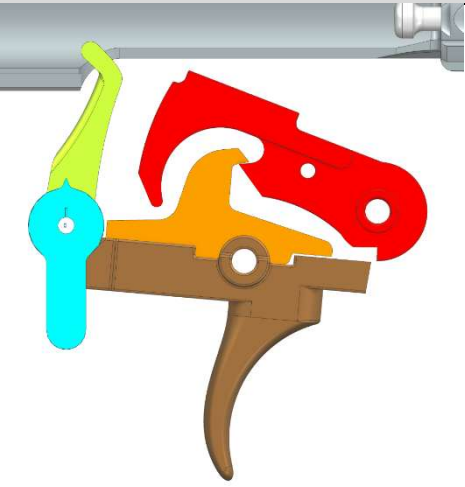
91. An exemplary comparison of the ARC-Fire, when assembled and used as intended, with claim 38 of the '403 patent is illustrated in the chart below:

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

'403 Patent, Claim 38	The ARC-Fire
	 ARC-Fire
a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;	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.  (Plaintiff-generated renderings of ARC Fire here and below)
a disconnecter having a disconnecter hook and adapted to pivot on a transverse disconnecter pivot axis; a trigger member; and	The ARC Fire is installed along with a disconnecter (orange) which has a disconnecter hook and pivots on a transverse disconnecter pivot axis. The ARC Fire is installed along with a trigger member (brown) Transverse pivot axis.

'403 Patent, Claim 38	The ARC-Fire
	
a safety selector adapted to be movable between a standard semi-automatic position and a forced reset semi-automatic position,	The ARC Fire is a safety selector adapted to be movable between a standard semi-automatic position,  In the SEMI position, the ARC Lever will not engage the Cam as its rotated rearward leaving the Cam in the unlocked position. ... and a “forced reset” semi-automatic position,  In the active reset position the ARC Lever is pushed into the Cam allowing the Lever to interact with the Cam. Image with text taken from AS Designs Facebook video

'403 Patent, Claim 38	The ARC-Fire
wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated, and after the hammer pivots rearward to a position where the hammer hook is past the disconnecter hook, rearward pressure on the trigger member must be reduced to permit the trigger member to then be actuated to fire a firearm.	When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated.  The hammer (red) pivots rearward to a position where the hammer hook is past the disconnecter hook (orange),  Rearward pressure on the trigger member (brown) must be reduced to permit the trigger member to then be actuated to fire a firearm.

'403 Patent, Claim 38	The ARC-Fire
	

92. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '403 patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, encouraging, advertising, promoting, and instructing others to use and/or how to use the Infringing Device while selling products.

93. 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.

94. 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.

95. 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.

96. 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.

97. 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.

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

99. 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.

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

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

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

103. 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.

104. 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.

105. 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.

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

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

108. 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.

109. 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).

110. 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.

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

112. 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 VI — FALSE DESIGNATION OF ORIGIN
15 U.S.C. § 1125(A)

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

114. 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.

115. 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.

116. 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.

117. 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).

118. 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.

119. 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.

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

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

COUNT VII — COMMON LAW TRADEMARK INFRINGEMENT AND UNFAIR COMPETITION

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

123. 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.

124. 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.

125. 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.

126. 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.

127. 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.

128. 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.

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

130. Upon information and belief, Defendants have realized unjust profits, gains, and advantages from their unlawful actions, including by making sales under the FRT 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: July 15, 2026

Respectfully submitted,

/s/ Decker A. Cammack

Decker A. Cammack

Texas Bar No. 24036311

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