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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING  
CASPER DIVISION**

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

**and**

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

**Plaintiffs.**

**v.-**

**GREY MARKET RESEARCH &  
DEVELOPMENT, LLC, a Wyoming  
Limited Liability Company,**

**Defendant.**

CASE NO. XX

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

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This is an action for patent infringement in which ABC IP LLC (“ABC”) and Rare Breed Triggers, Inc. (“Rare Breed”) (collectively, “Plaintiffs”) accuse Grey Market Research & Development, LLC (“GMR” or “Defendant”), of infringing U.S. Patent Nos. 12,038,247; 12,031,784; 12,529,538; 12,578,159; and 12,636,403 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. Upon information and belief, GMR is a limited liability company organized under the laws of Wyoming with an address of 30 N. Gould Street, #43044, Sheridan, Wyoming 82801.

### **JURISDICTION AND VENUE**

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

5. 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.

6. Personal jurisdiction over Defendant is proper in this District because the Defendant resides in and has a regular and established place of business in this District.

7. Venue is proper in this district pursuant to 28 U.S.C. § 1400(b). Defendant resides in or has committed acts of infringement and has a regular and established place of business in this District.

### **BACKGROUND**

8. This lawsuit asserts direct, contributory, and induced infringement of U.S. Patent Nos. 12,038,247 (“the ’247 Patent”), 12,031,784 (“the ’784 Patent”), 12,529,538 (“the ’538

Patent”), 12,578,159 (“the ’159 Patent”), and 12,636,403 (“the ’403 Patent”) (together, “the Asserted Patents”).

9. 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.

10. 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.

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

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

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

14. 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”).

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

16. 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.

17. Upon information and belief, Defendant has 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.

18. On April 1, 2025, a cease and desist demand letter was delivered to GMR informing it of the '247 Patent and expressly accusing its Super Safety and other similar products of patent infringement.

### **THE INVENTIONS**

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

20. 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.

21. In contrast, in a forced reset trigger mechanism, cycling of the bolt carrier or bolt causes the trigger member to be forced to the reset position and hold the trigger member there until the bolt or bolt carrier is back in battery, when it is safe for the user to pull the trigger again, without the need for a disconnecter.

22. 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 force the trigger member to reset and prevent the trigger member from being pulled again until the action has returned to the in-battery position.

23. The '784 Patent provides a device that works in a forced reset 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.

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

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

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

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

### **THE INFRINGING DEVICES**

28. On information and belief, Defendant previously or is currently making, using, selling, and/or offering for sale products that embody the technology claimed in the Asserted Patents, including the following (collectively, the "Infringing Devices"):

## I. The Super Safety

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

30. On information and belief, Defendant is making, using, selling, and/or offering for sale the Super Safety via the website [www.greymarketresearch.net](http://www.greymarketresearch.net), in multiple variants:

- a. A partial kit, which includes at minimum the cam and cam lever components, and may further include one or more additional components—when these components are installed in combination with a standard AR-pattern hammer and disconnecter, with standard springs, the combination creates the invention of the ’247, ’784, ’538, ’159, and ’403 Patents—and/or;
- b. A complete kit, which includes at minimum the cam and cam lever components and additional components (e.g., a standard AR-pattern hammer, disconnecter, standard springs, and a modified trigger).

31. Exemplary photographs are shown below:



★★★★★  
GMR  
**Kit A -  
4140/Legacy/Curved**  
\$100.00



★★★★★  
GMR  
**M508 L/C Kit AR308  
complete kit with LEGACY  
cam and CURVED trigger**  
\$130.00



**Cassette trigger #1 -  
Curved**  
\$145.00

www.greymarketresearch.net

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

### **COUNT I – INFRINGEMENT OF THE '247 PATENT**

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

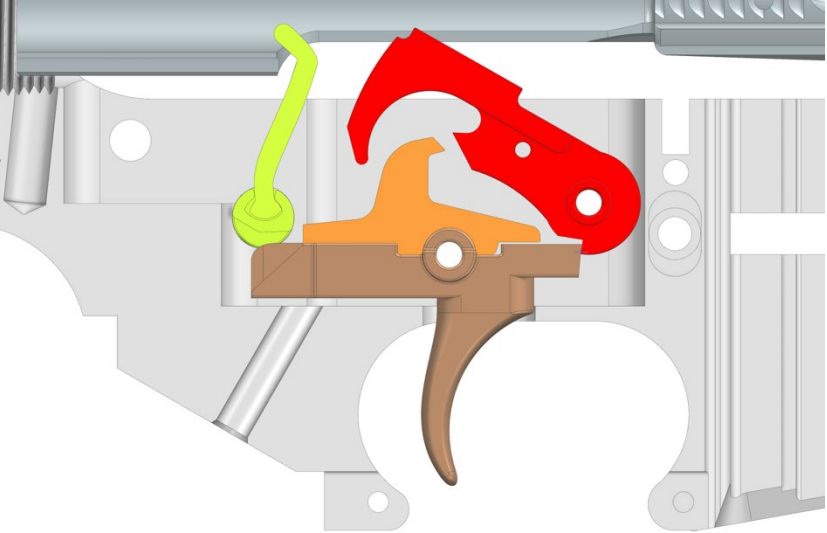
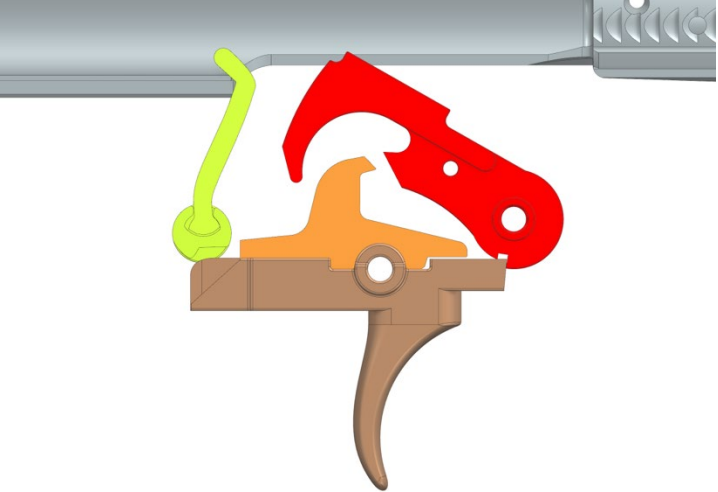
34. In violation of 35 U.S.C. § 271, Defendant has infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents, by among other things, making, using, offering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

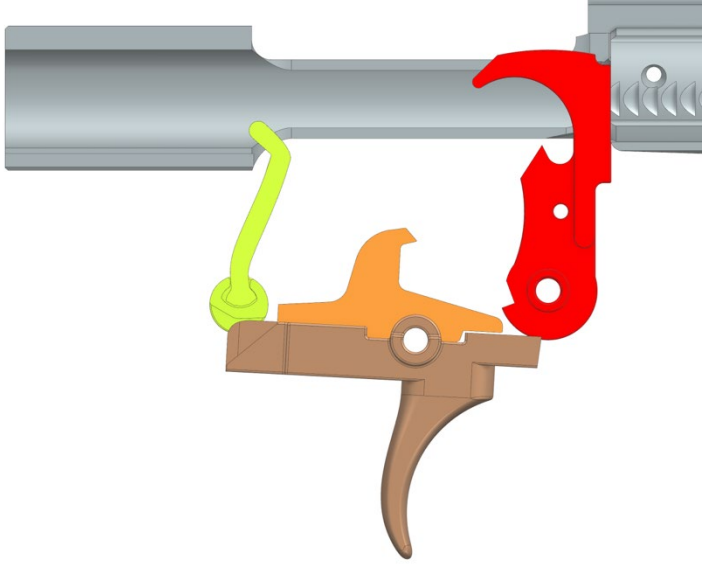
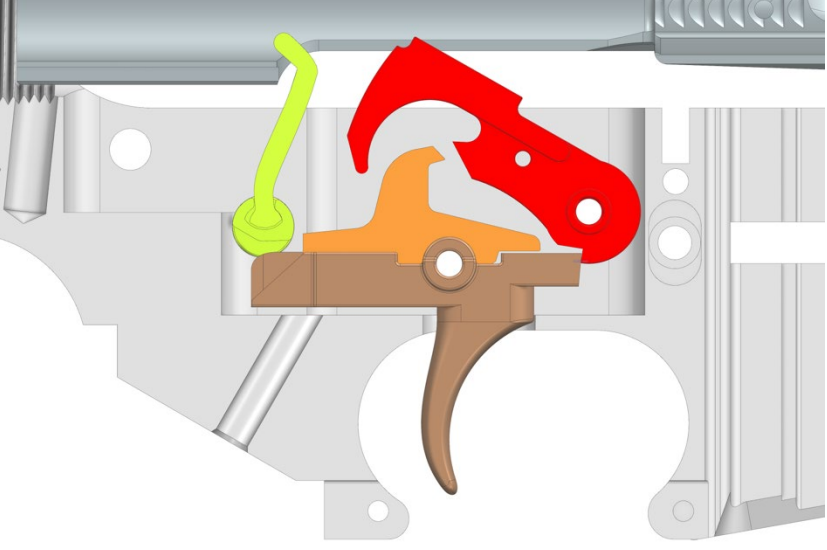
35. On information and belief, Defendant has and continues to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents.

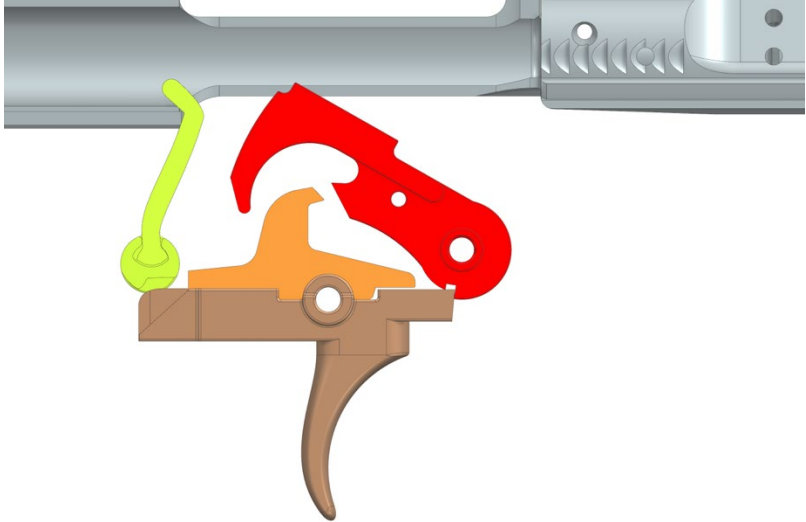
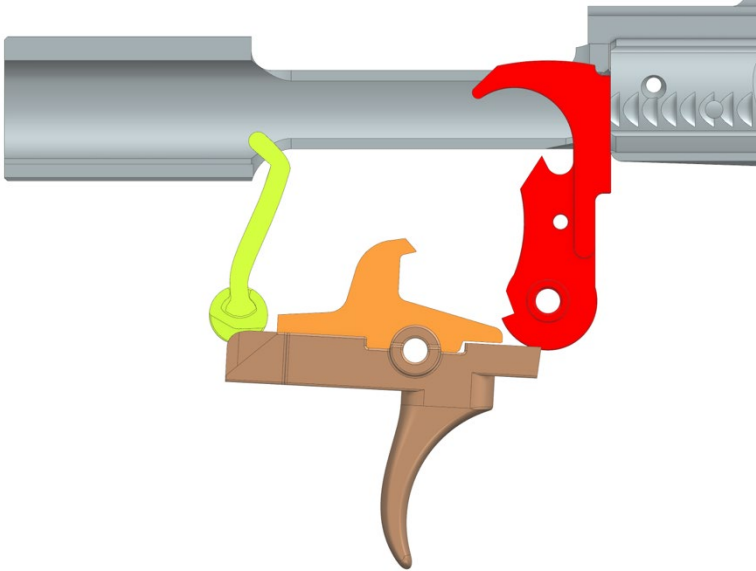
36. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

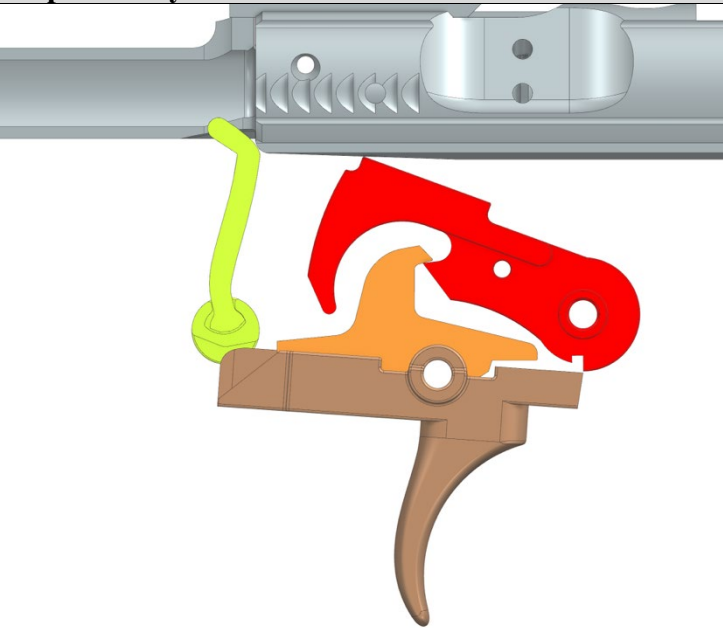
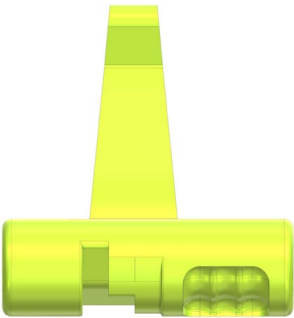
| '247 Patent Claim 15                        | The Super Safety                                                                                                                                                                                                                              |
|---------------------------------------------|-----------------------------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

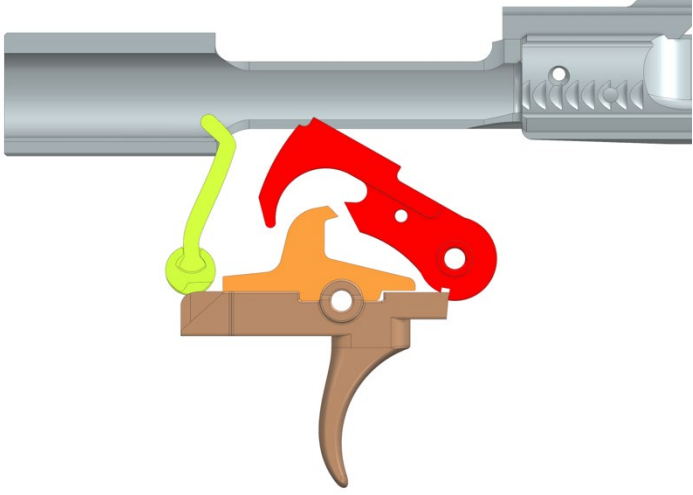
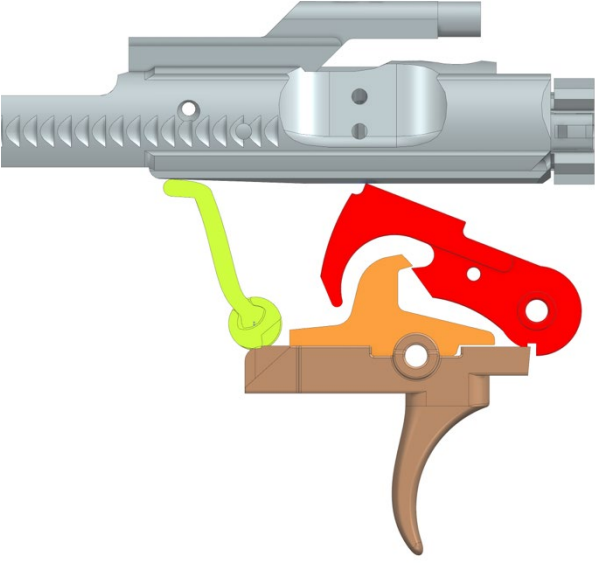
| '247 Patent Claim 15                                                                                                                           | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                |  <p data-bbox="889 737 1122 772"><b>The Super Safety</b></p> <p data-bbox="602 789 1409 863"><i>See also, Ex. J, Super Safety 3D Printed Active Trigger System v4.4, (“Super Safety Guide”) at 12</i></p>  <p data-bbox="948 1257 1068 1283">★★★★★</p> <p data-bbox="987 1304 1029 1325">GMR</p> <p data-bbox="898 1341 1118 1394"><b>Kit A -<br/>4140/Legacy/Curved</b></p> <p data-bbox="979 1409 1040 1430">\$100.00</p> <p data-bbox="643 1457 1370 1493"><a href="https://greymarketresearch.net/kit-a-4140-legacy-curved/">https://greymarketresearch.net/kit-a-4140-legacy-curved/</a></p> |
| a hammer having a sear catch and a hook for engaging a disconnecter and adapted to be mounted in a fire control mechanism pocket of a receiver | The Super Safety (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear catch and a hook for engaging a disconnecter (orange).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

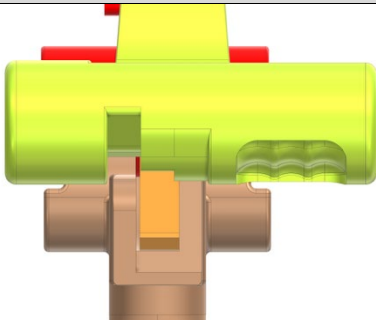
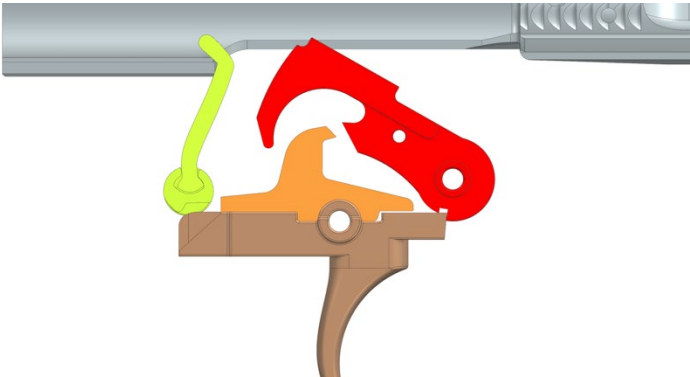
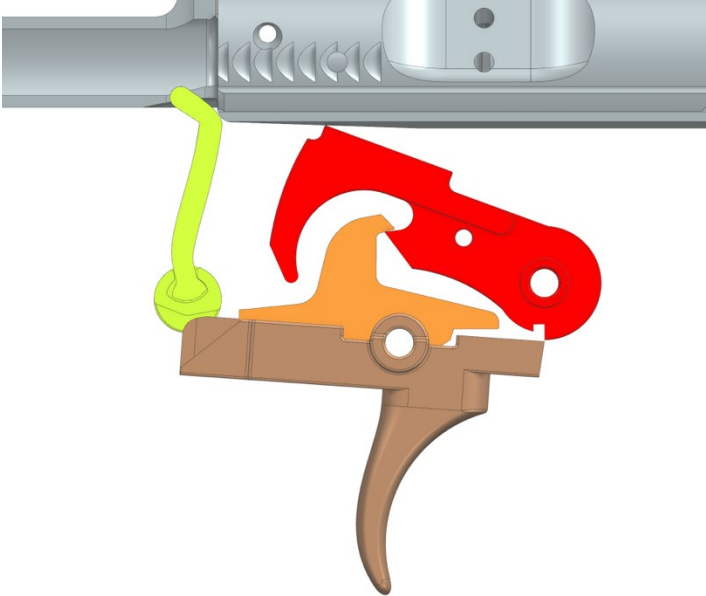
| '247 Patent Claim 15                                                                                                                                                                                  | The Super Safety                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                       |  <p data-bbox="625 804 1391 877">(Plaintiff-generated renderings of the Super Safety here and below)</p>                                                                                                                                                                                                    |
| <p data-bbox="203 900 570 1150">to pivot on a transverse hammer pivot axis between set and released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,</p> | <p data-bbox="597 900 1360 1037">The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt carrier.</p>  <p data-bbox="862 1587 1154 1619"><b>Hammer Set Position</b></p> |

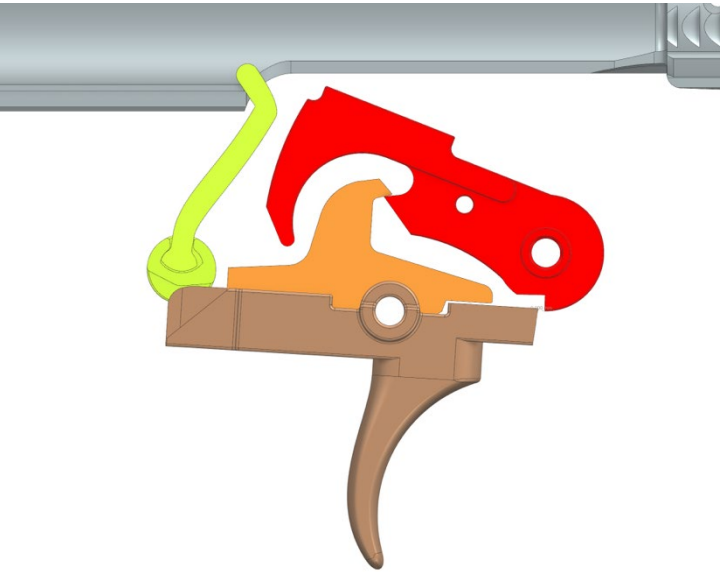
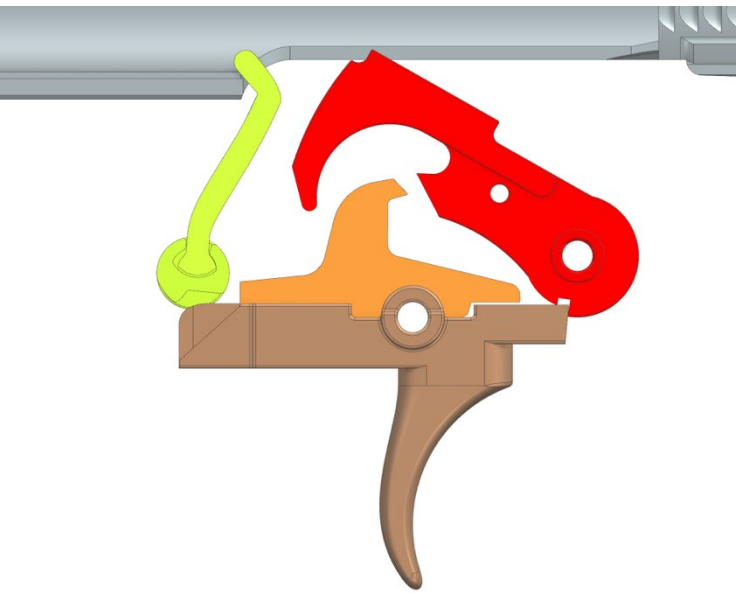
| '247 Patent Claim 15                                                                                                                                                                                                     | The Super Safety                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                          |  <p data-bbox="824 835 1198 867"><b>Hammer Released Position</b></p>                                                                                                                                                                                                                                 |
| <p data-bbox="199 894 565 1140">a trigger member having a sear and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and released positions,</p> | <p data-bbox="589 894 1419 1066">The Super Safety (yellow) is installed with a trigger member (brown) in the fire control mechanism pocket and the trigger member pivots on a transverse trigger member pivot axis between set and released positions. The trigger member (brown) has a sear.</p>  |
| <p data-bbox="199 1665 565 1839">wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member</p>                                                                          | <p data-bbox="589 1665 1409 1770">The sear of the trigger member (brown) and sear catch of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.</p>                                                                                                                                                                                       |

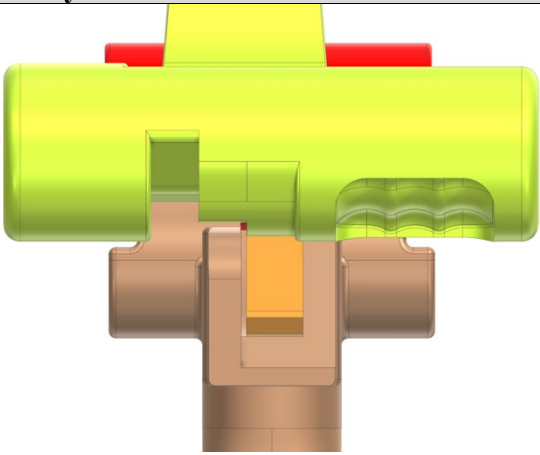
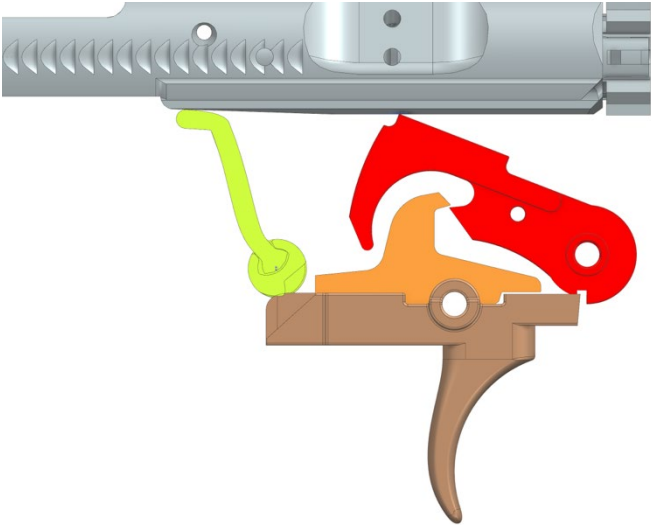
| '247 Patent Claim 15                                                                                                                                                      | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                           |  <p>The diagram shows a cross-sectional view of a firearm's trigger mechanism. A red hammer is in a cocked position, with its sear (a curved, hook-like part) engaged with the trigger member. The trigger member is brown and is in a set position, held back by the hammer's sear. An orange disconnect is positioned between the trigger member and the hammer. A green spring is visible on the left side of the trigger member. The trigger member has a curved, hook-like shape at its base.</p> <p><b>Trigger Member Set Position</b></p> |
| and are out of engagement in said released positions of said hammer and trigger member,                                                                                   |  <p>The diagram shows the same trigger mechanism as the previous one, but the hammer (red) is now in a released position, moving forward. The sear of the hammer is no longer engaged with the trigger member. The trigger member (brown) is now in a released position, moving forward. The orange disconnect is still positioned between the trigger member and the hammer. The green spring is still visible on the left side of the trigger member.</p> <p><b>Trigger Member Released Position</b></p>                                      |
| said disconnecter having a hook for engaging said hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis, | <p>The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).</p>                                                                                                                                                                                                                                                                                                                                                                                                                        |

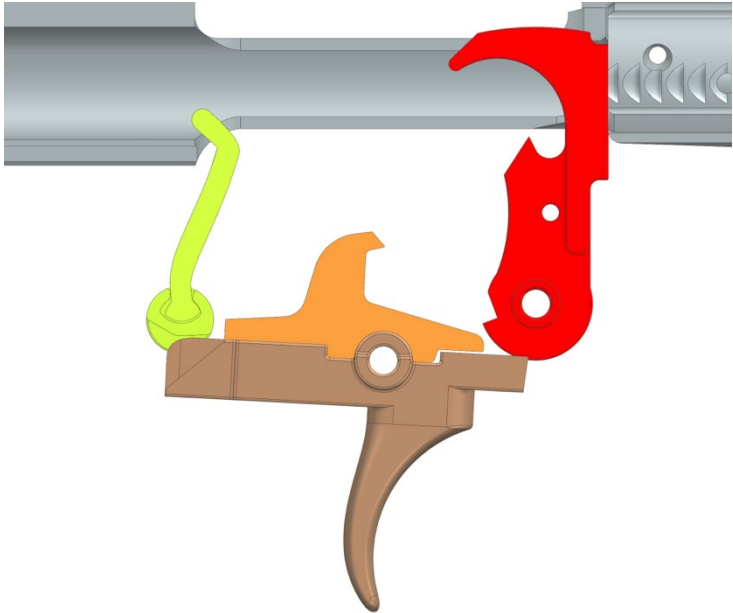
| '247 Patent Claim 15                                                                                                                                                                                    | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                         |  <p data-bbox="813 869 1198 905"><b>Disconnecter Hook Engaged</b></p>                                                                                                                                                                                                                                                                                         |
| <p data-bbox="203 926 521 1104">and a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,</p>                                                                 | <p data-bbox="592 926 1390 1066">The Super Safety has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (<i>See image above depicting Super Safety, shown in yellow, in fire control mechanism pocket</i>)</p>  <p data-bbox="737 1451 1276 1486"><b>Super Safety Cam with Lobe and Lever</b></p> |
| <p data-bbox="203 1503 561 1755">said cam being movable between a first position and a second position, in said second position said cam lobe forces said trigger member towards said set position,</p> | <p data-bbox="592 1503 1333 1570">The cam is movable between a first position and a second position.</p>                                                                                                                                                                                                                                                                                                                                        |

| '247 Patent Claim 15                         | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                              |  <p data-bbox="808 741 1203 772"><b>Cam and Lobe First Position</b></p> <p data-bbox="592 793 1393 898">In the second position, the cam lobe forces the trigger member (brown) toward the set position when the cam is in the forced reset semi-automatic mode.</p>  <p data-bbox="792 1518 1219 1549"><b>Cam and Lobe Second Position</b></p> |
| whereupon in a standard semi-automatic mode, | During at least part of the cycle in the standard semi-automatic mode,                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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

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

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

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

37. On information and belief, in addition to direct infringement, Defendant takes active steps to induce others, including its customers, to directly infringe the '247 patent. Defendant takes such active steps knowing that those steps will induce, encourage, and facilitate

direct infringement by others. Such active steps include, but are not limited to, installation of, encouraging, advertising, promoting, and instructing others to use and/or how to use the Super Safety.

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

39. On information and belief, Defendant also contributes to the infringement of the '247 Patent by others, including its customers. Acts by Defendant that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendant of the components of the Super Safety such as the cam or cam lever arm. The components are not suitable for substantial noninfringing use as they are specially designed and adapted to be used in a fire control unit to forcibly reset a trigger mechanism and infringe the '247 Patent.

40. Defendant has 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, Defendant has known or should have known that its actions constituted and continue to constitute infringement of the '247 Patent and that the '247 Patent is valid at least through the service of the April 1, 2025, letter. Defendant could not reasonably or subjectively believe that its actions do not constitute infringement of the '247 Patent, nor could it reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Defendant has continued its infringing activities. As such, Defendant willfully infringes the '247 Patent.

41. By its actions, Defendant has injured Plaintiffs and is liable to Plaintiffs for infringement of the '247 Patent pursuant to 35 U.S.C. § 271.

42. By its actions, Defendant's 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.

43. By its actions, Defendant's infringement of the '247 Patent has damaged and continues to damage Plaintiffs in an amount yet to be determined.

44. Defendant's 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.

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

46. Plaintiffs have been substantially harmed by Defendant's 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**

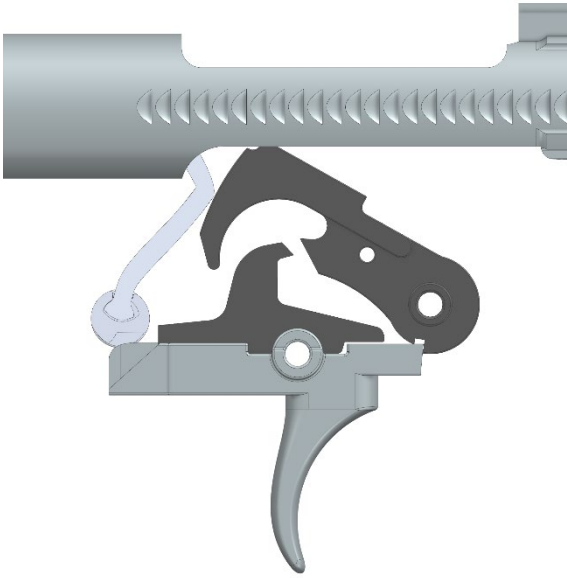
47. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

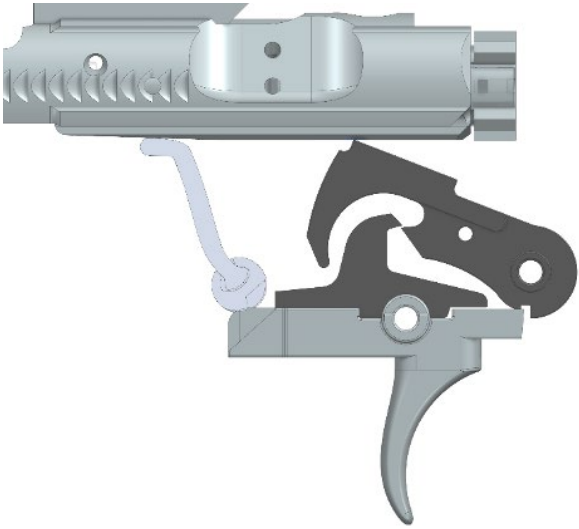
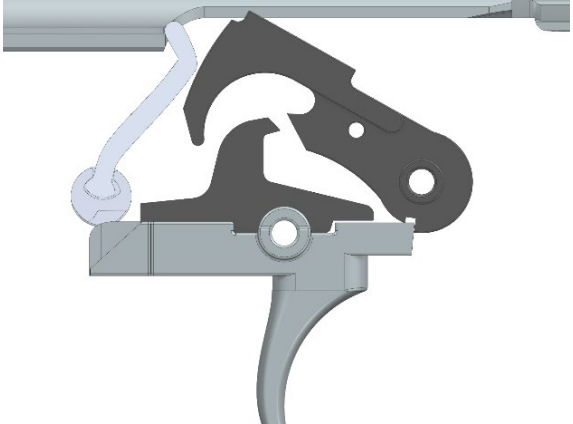
48. In violation of 35 U.S.C. § 271, Defendant has infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, offering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

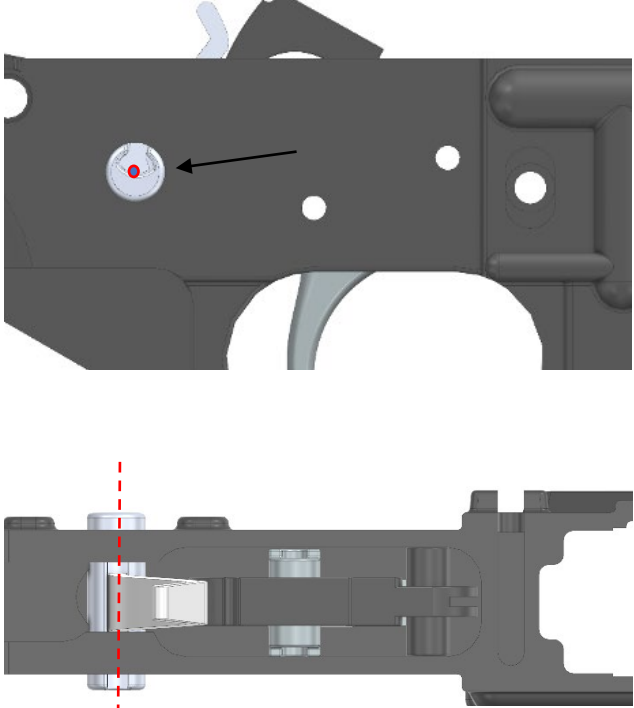
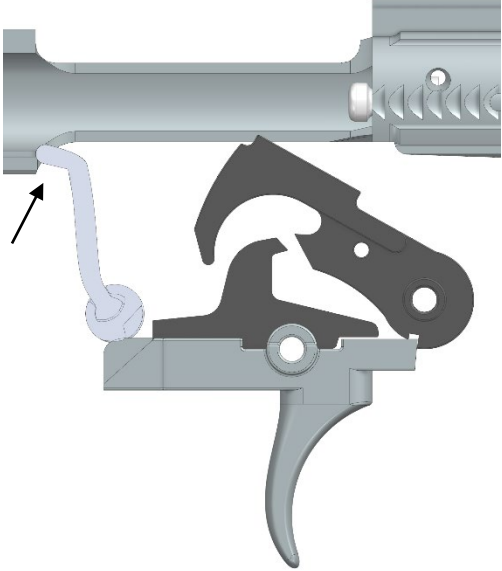
49. On information and belief, Defendant has and continues to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

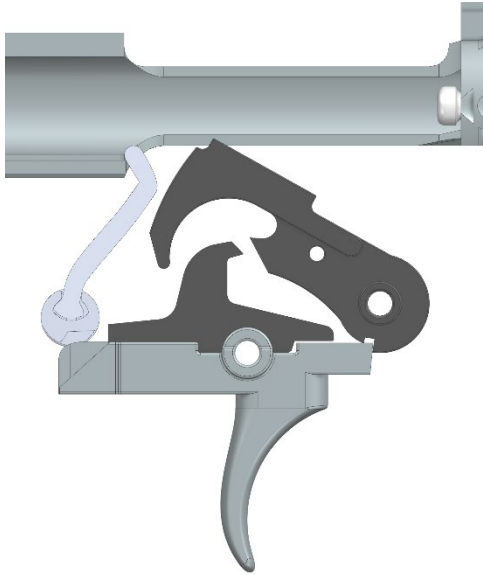
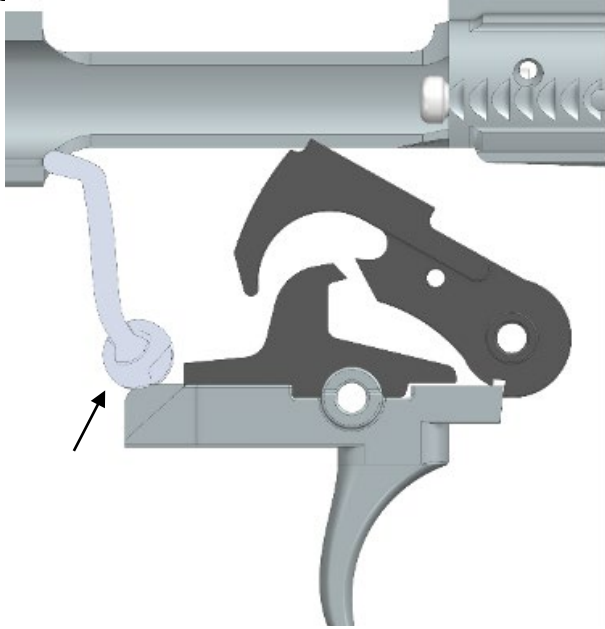
50. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

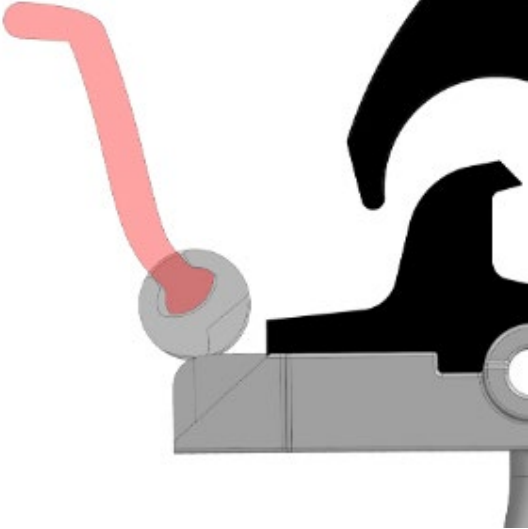
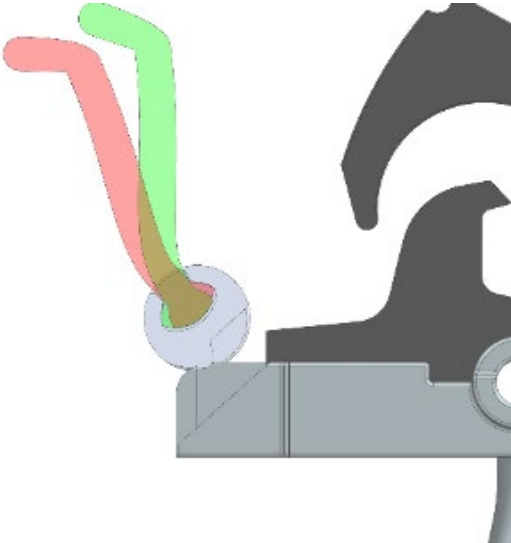
| Claim 1: Language                                                                                     | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1. In a forced reset trigger mechanism, an extended trigger member locking device, comprising:</p> | <p>When installed and used as directed, the Super Safety is part of a forced reset trigger mechanism and functions as an extended trigger member locking device.</p> <div data-bbox="824 810 1343 1335" data-label="Image"> </div> <div data-bbox="846 1367 1320 1839" data-label="Image"> </div> <p style="text-align: center;"><b>Super Safety</b></p> |

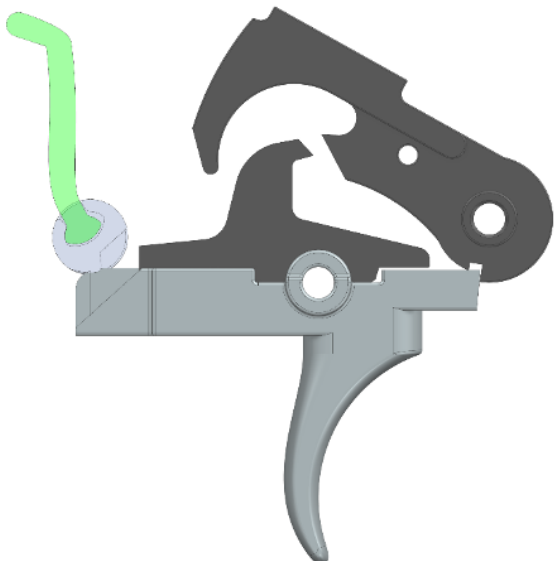
| Claim 1: Language | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   | <p data-bbox="824 237 1344 268"><i>See also, Ex. J, Super Safety Guide at 12</i></p>  <p data-bbox="1036 625 1136 646">★★★★★</p> <p data-bbox="1068 659 1104 680">GMR</p> <p data-bbox="992 688 1180 762"><b>Kit A -<br/>4140/Legacy/Curved</b><br/>\$100.00</p> <p data-bbox="768 791 1401 856"><a href="https://greymarketresearch.net/kit-a-4140-legacy-curved/">https://greymarketresearch.net/kit-a-4140-legacy-curved/</a></p>  <p data-bbox="932 1522 1235 1554"><b>Super Safety Installed</b></p> <p data-bbox="768 1560 1401 1665">(Plaintiff-generated renderings of Super Safety here and below; Locking member and bolt carrier shown here and below in section view for clarity)</p> <p data-bbox="735 1707 1425 1843">“The Super Safety is a mechanism that actively resets the trigger of a firearm to allow the operator to fire again, quickly, and efficiently. The Super Safety has been designed to operate with AR-15 pattern firearms</p> |

| Claim 1: Language                                                                                              | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                | that use a mil-spec bolt carrier and fire control group.” Super Safety Guide at 1.                                                                                                                                                                                                                                                             |
| a locking member that is movable between a first position in which it locks a trigger against pulling movement | <p data-bbox="735 348 1437 453">The Super Safety operates as a locking member and has a first position in which the Super Safety locks the trigger member against pulling movement.</p>  <p data-bbox="938 1016 1230 1052"><b>Locked First Position</b></p> |
| and a second position where it does not restrict movement of the trigger member,                               | <p data-bbox="735 1094 1437 1199">The Super Safety is moveable from the first position to a second position where it does not restrict movement of the trigger member.</p>  <p data-bbox="906 1625 1263 1661"><b>Unlocked Second Position</b></p>          |
| the locking member configured to be movably supported by a frame                                               | The Super Safety is movably (pivotal) about the axis depicted below) supported by a frame (the lower receiver).                                                                                                                                                                                                                                |

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

| Claim 1: Language                                                                                                                                                       | Infringing Device (Super Safety)                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                         |  <p data-bbox="906 856 1260 888"><b>Unlocked Second Position</b></p>                                                                                                                                         |
| <p data-bbox="203 932 651 1003">the locking member having a body portion that is movably supported</p>                                                                  | <p data-bbox="732 932 1409 1003">The Super Safety has a body portion that is movably supported by the lower receiver.</p>                                                                                   |
| <p data-bbox="203 1661 708 1808">and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position</p> | <p data-bbox="732 1661 1430 1837">The Super Safety has an upwardly extending deflectable portion (lever arm). The dovetail connection is designed to allow separate movement of the lever arm relative to the body portion between one position (depicted in red) where it is extended and</p> |

| Claim 1: Language | Infringing Device (Super Safety)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                   | <p data-bbox="735 237 1369 306">another position where it is deflected (depicted in green).</p>  <p data-bbox="735 982 1430 1125">Below illustrates the upward extending deflectable portion's (lever arm) total separate travel with an overlay of the lever in both positions without the body portion moving.</p>  <p data-bbox="735 1703 1419 1877">“The dovetail joint does not immediately transfer torque from the lever to the cam. The lever pivots in the cam until the void is filled. Once the void is filled the hammer can transfer torque to the cam via the upper and lower contact surfaces and. Note that the</p> |

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

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

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

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

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

54. Defendant has 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, Defendant knows or should have known that its actions constituted and continue to constitute infringement of the '784 Patent and that the '784 Patent is valid at least through the service of Defendant could not reasonably or subjectively believe that its actions do not constitute infringement of the '784 Patent, nor could it reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Defendant has continued its infringing activities. As such, Defendant willfully infringes the '784 Patent.

55. By its actions, Defendant has injured Plaintiffs and is liable to Plaintiffs for infringement of the '784 Patent pursuant to 35 U.S.C. § 271.

56. By its actions, Defendant's 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.

57. By its actions, Defendant's infringement of the '784 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

58. Defendant's 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.

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

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

### **COUNT III — INFRINGEMENT OF THE '538 PATENT**

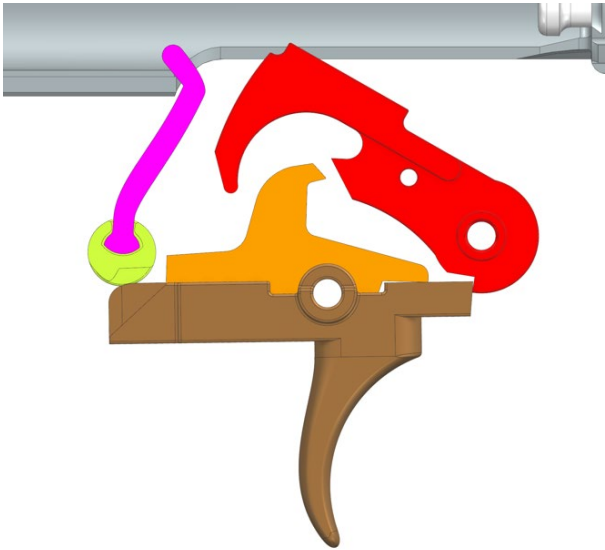
61. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

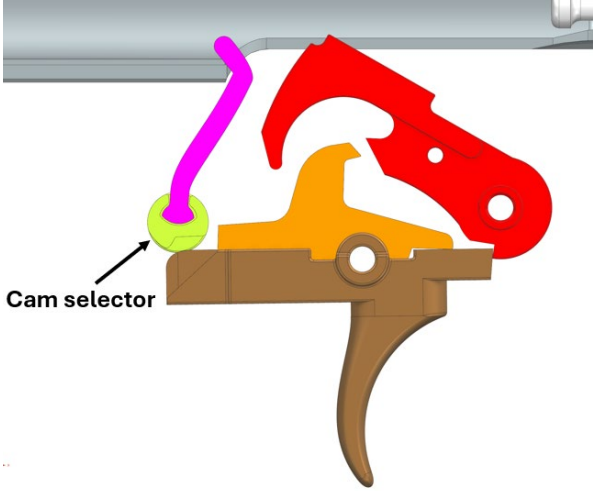
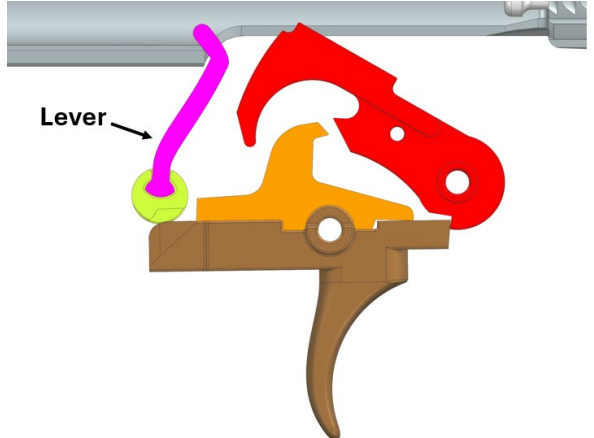
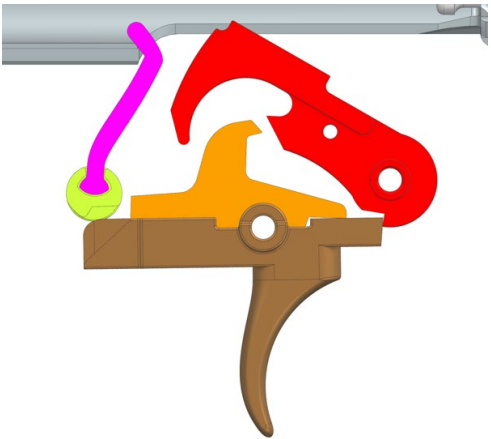
62. In violation of 35 U.S.C. § 271, Defendant has infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '538 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, offering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

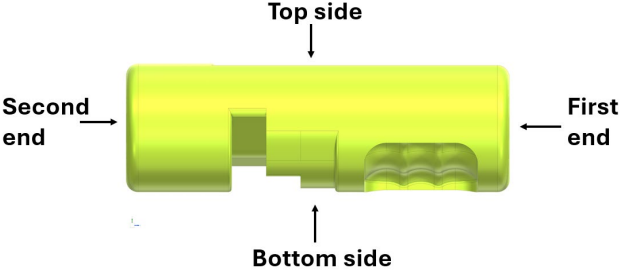
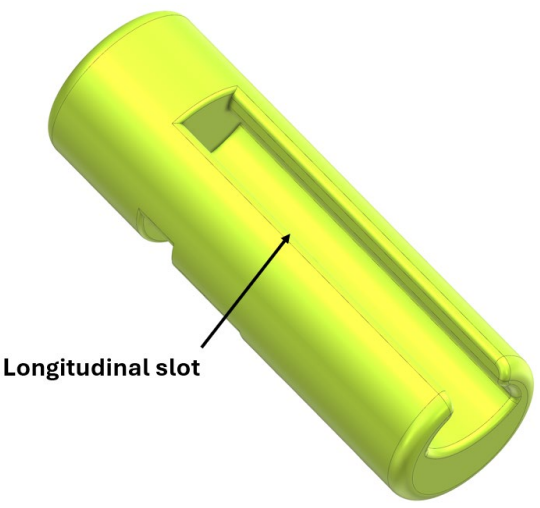
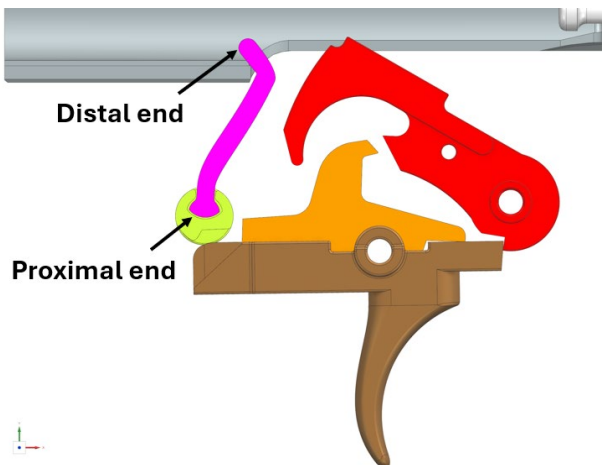
63. On information and belief, Defendant has and continues to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '538 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

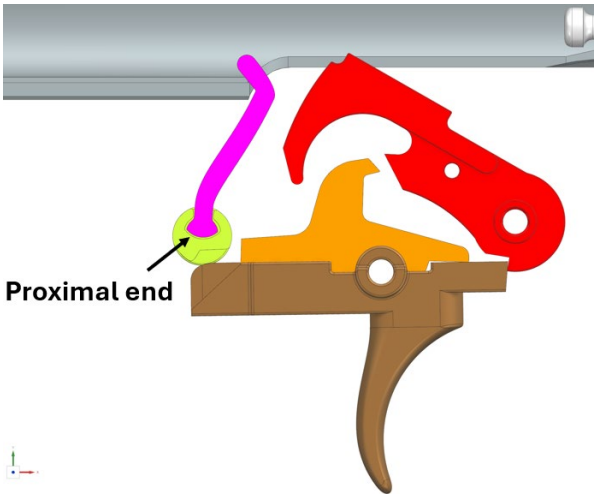
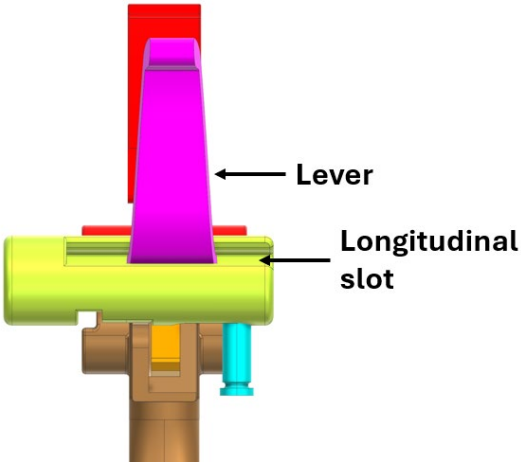
64. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '538 Patent is illustrated in the chart below:

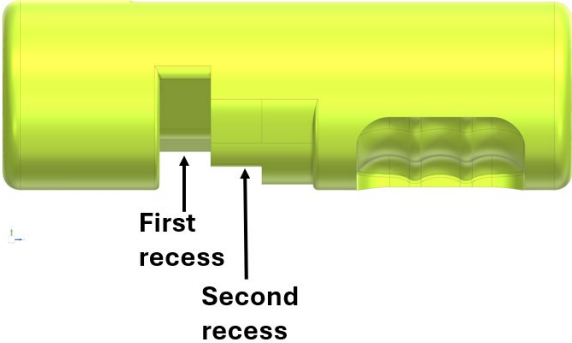
| '538 Patent Claim 1                             | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. A safety mechanism for a firearm comprising: | <p data-bbox="605 604 1377 667">The Super Safety is part of a forced reset trigger mechanism installed into a firearm receiver in place of a standard safety.</p> <div data-bbox="799 705 1235 1142">  </div> <p data-bbox="930 1150 1104 1182" style="text-align: center;"><b>Super Safety</b></p> <p data-bbox="613 1224 1425 1287" style="text-align: center;">Ex. J, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) ("Super Safety Guide") at 12.</p> <div data-bbox="886 1293 1148 1650">  </div> <div data-bbox="959 1671 1081 1692" style="text-align: center;">★★★★★</div> <p data-bbox="1000 1717 1040 1738" style="text-align: center;">GMR</p> <p data-bbox="911 1755 1130 1808" style="text-align: center;"><b>Kit A -<br/>4140/Legacy/Curved</b></p> <p data-bbox="992 1818 1049 1839" style="text-align: center;">\$100.00</p> <p data-bbox="654 1871 1382 1902" style="text-align: center;"><a href="https://greymarketresearch.net/kit-a-4140-legacy-curved/">https://greymarketresearch.net/kit-a-4140-legacy-curved/</a></p> |

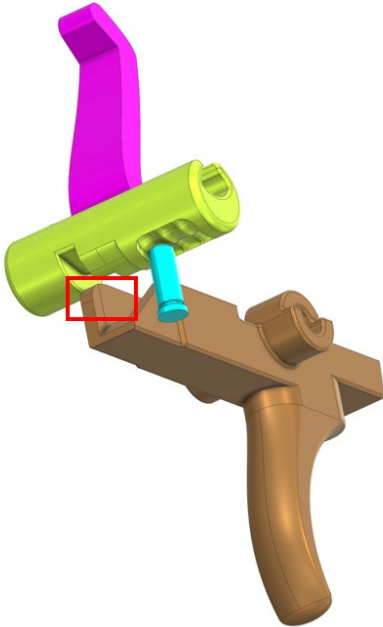
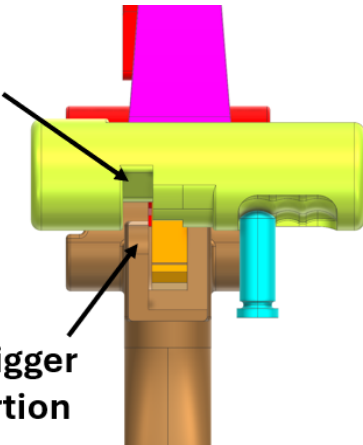
| '538 Patent Claim 1 | The Super Safety                                                                                                                                                                                                                                                                                                                                               |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |  <p data-bbox="865 821 1170 856"><b>Super Safety Installed</b></p> <p data-bbox="683 894 1354 999">(Plaintiff-generated renderings of Super Safety here and below; cam selector and bolt carrier shown in section view for clarity)</p>                                      |
| a cam selector;     | <p data-bbox="602 1005 1421 1077">The Super Safety includes a dual mode cam selector that allows for selection of safe, active reset, and passive reset modes.</p>  <p data-bbox="824 1478 1208 1549"><b>Dual Mode Cam Selector</b><br/>Ex. J, Super Safety Guide at 1</p> |

| '538 Patent Claim 1 | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |  <p>A side-view diagram of a firearm's trigger assembly. A brown trigger is at the bottom. Above it is a yellow trigger guard. A red hammer is positioned above the trigger guard. A pink lever is attached to a green circular cam selector, which is mounted on the trigger guard. An arrow points from the text 'Cam selector' to the green circle.</p> |
| a lever;            | <p>The Super Safety has a lever (pink) extending upward from the cam selector.</p>  <p>A side-view diagram of the same trigger assembly. The pink lever is now extended further upward from the green cam selector. An arrow points from the text 'Lever' to the pink lever.</p>                                                                          |
| a trigger;          | <p>The cam selector operates on a trigger. (brown)</p>  <p>A side-view diagram of the same trigger assembly. The brown trigger is shown in a depressed position, pressing against the yellow trigger guard, which in turn moves the green cam selector and the pink lever.</p>                                                                           |

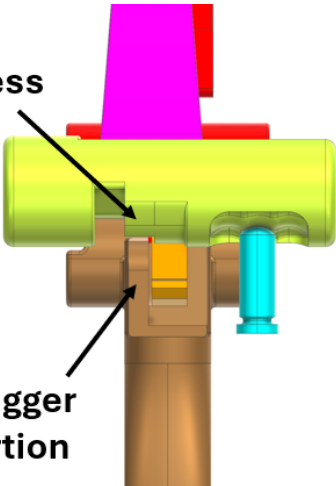
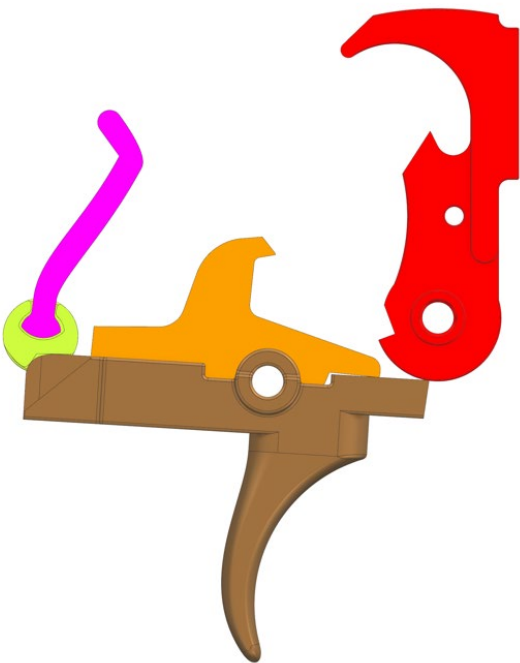
| '538 Patent Claim 1                                                                             | The Super Safety                                                                                                                                                                                        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

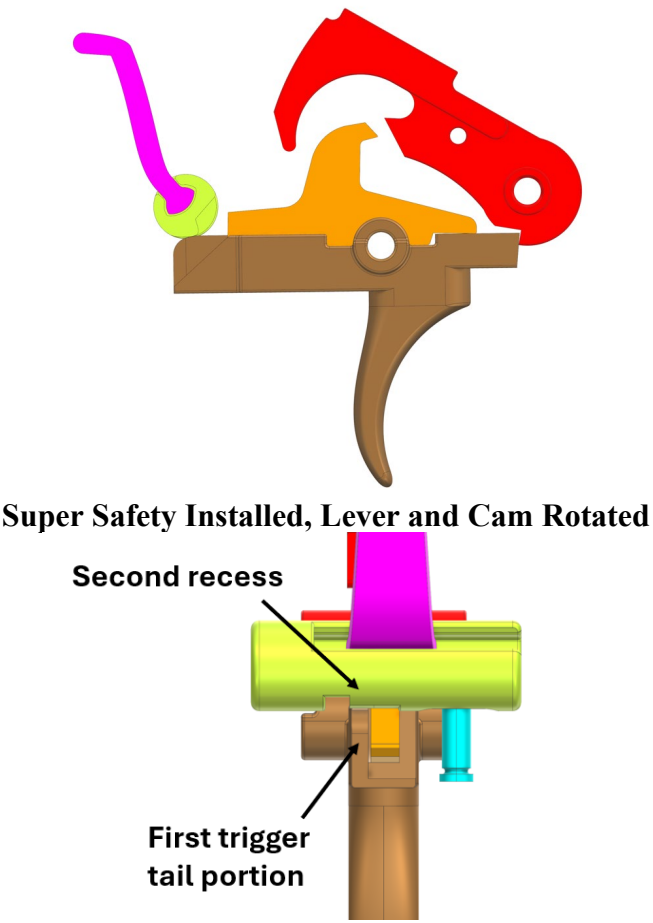
| '538 Patent Claim 1                                                                     | The Super Safety                                                                                                                                                                                                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

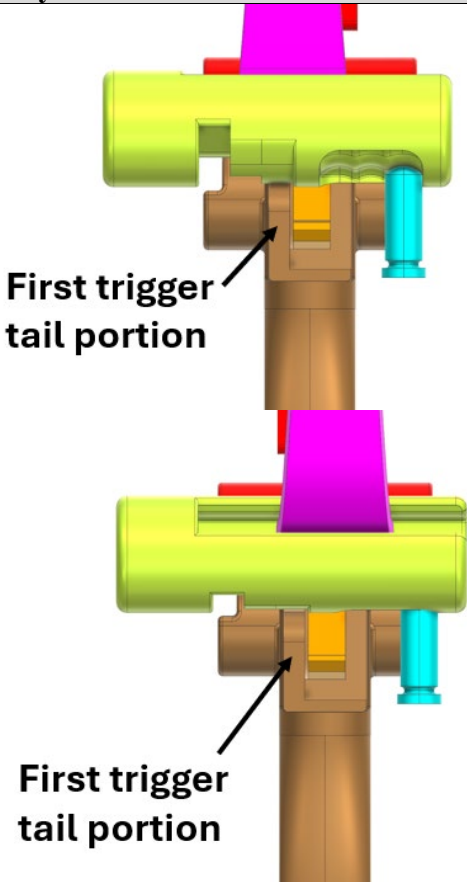
| '538 Patent Claim 1                                                                                                   | The Super Safety                                                                                                                                                                  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

| '538 Patent Claim 1                                                                                                                            | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>the cam selector being configured to operate between a first mode, a second mode, and a third mode;</p>                                     | <p>The Super Safety dual mode cam is operable in three modes: (1) passive reset (standard semi-automatic) (2) active reset, and (3) safe. Super Safety Guide at 1.</p>                                                                                                                                                                                                                                                                                                                                                                                |
| <p>wherein the first mode of the cam selector is configured to allow the first trigger tail portion to be movable within the first recess,</p> | <p>The Super Safety dual mode cam selector is operable in standard semi-automatic mode, in which the first trigger tail aligns with the first recess of the cam.</p> <div data-bbox="714 1218 1282 1701">  <p><b>First recess</b></p> <p><b>First trigger tail portion</b></p> <p><b>Standard Semi-Automatic Mode</b></p> </div> <p>When the cam selector is in the first mode, the first trigger tail portion is movable within the first recess of the cam.</p> |

| '538 Patent Claim 1 | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |  <p data-bbox="860 735 1169 777"><b>Super Safety Installed</b></p> <p data-bbox="714 1407 925 1449"><b>First recess</b></p> <p data-bbox="795 1701 1006 1785"><b>First trigger tail portion</b></p> <p data-bbox="633 1806 1396 1890"><b>Super Safety Installed, Trigger Pulled, Lever and Cam Rotated</b></p> |

| '538 Patent Claim 1                                                                                                                                                                                                                                                                         | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p data-bbox="203 268 578 447">wherein the second mode of the cam selector is configured to allow the first trigger tail portion to engage the second recess</p> <p data-bbox="203 934 578 1077">and be moved down by a cam portion of the second recess when the cam selector rotates,</p> | <p data-bbox="600 268 1414 373">The Super Safety dual mode cam selector is operable in active reset mode, in which the first trigger tail aligns with the second recess of the cam.</p> <div data-bbox="711 373 1258 892"><p data-bbox="711 436 967 468"><b>Second recess</b></p><p data-bbox="800 751 1000 835"><b>First trigger tail portion</b></p><p data-bbox="889 863 1146 892"><b>Active Reset Mode</b></p></div> <p data-bbox="600 934 1414 1039">In the second mode, when the cam is rotated by the lever, the cam selector portion of the second recess moves the first trigger tail portion down.</p> <div data-bbox="768 1108 1284 1766"></div> <p data-bbox="760 1822 1276 1854"><b>Super Safety Installed, Trigger Pulled</b></p> |

| '538 Patent Claim 1                                                                                           | The Super Safety                                                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                               |  <p style="text-align: center;"><b>Super Safety Installed, Lever and Cam Rotated</b></p> <p style="text-align: center;"><b>Second recess</b></p> <p style="text-align: center;"><b>First trigger tail portion</b></p> |
| <p>and wherein the third mode of the cam selector is configured to prevent the trigger from being pulled.</p> | <p>The Super Safety dual mode cam is operable in safe mode, in which the first trigger tail portion does not align with a recess in the cam. The trigger is not movable within a recess of the cam, and the cam therefore prevents the trigger from being pulled.</p>                                    |

| '538 Patent Claim 1 | The Super Safety                                                                                                                                                                                                                |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                     |  <p data-bbox="787 493 998 577"><b>First trigger tail portion</b></p> <p data-bbox="803 976 1015 1060"><b>First trigger tail portion</b></p> |

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

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

67. On information and belief, Defendant also contributes to the infringement of the '538 Patent by others, including its customers. Acts by Defendant that contribute to the

infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendant of the components of the Super Safety, such as the cam or cam lever arm. The components are not suitable for substantial noninfringing use as they are specially designed and adapted to be used in a fire control unit to forcibly reset a trigger mechanism and infringe the '538 Patent.

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

69. By its actions, Defendant has injured Plaintiffs and are liable to Plaintiffs for infringement of the '538 Patent pursuant to 35 U.S.C. § 271.

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

71. By its actions, Defendant's infringement of the '538 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

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

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

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

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

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

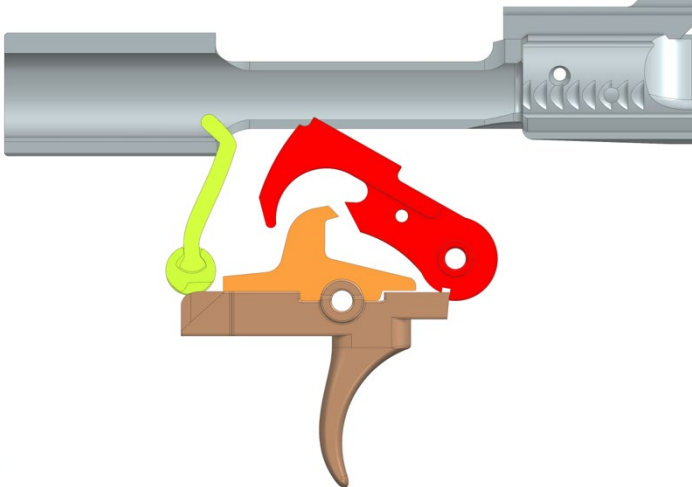
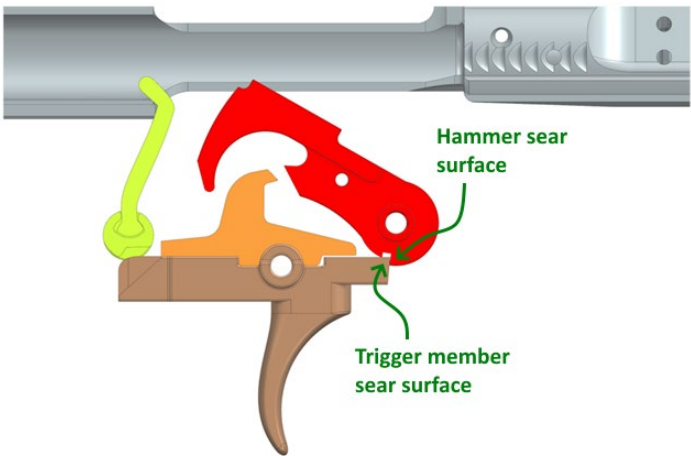
76. In violation of 35 U.S.C. § 271, Defendant has infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using, offering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

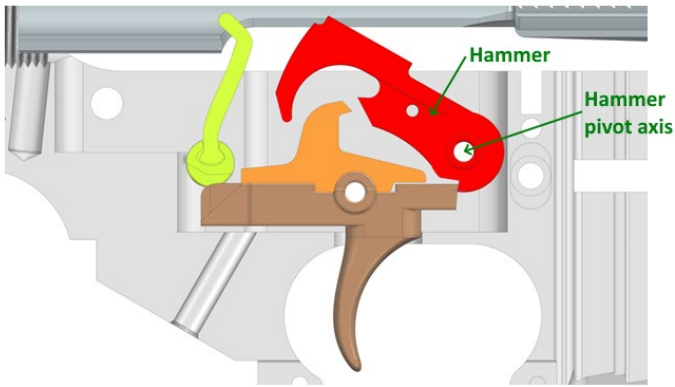
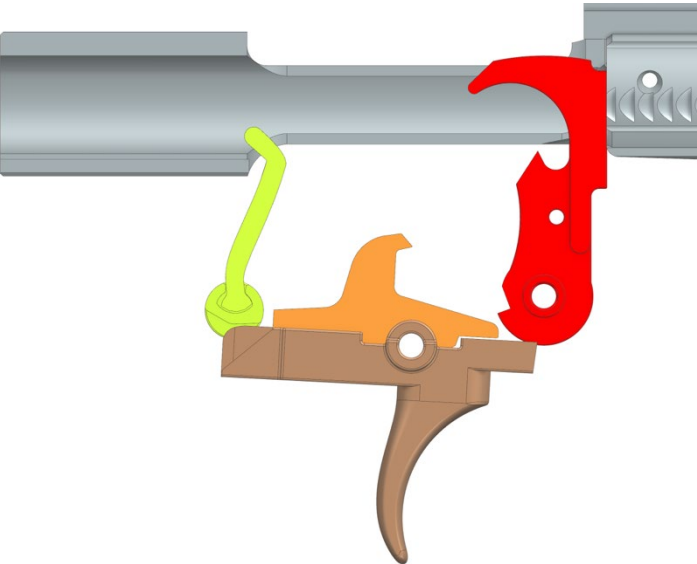
77. On information and belief, Defendant has and continues to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

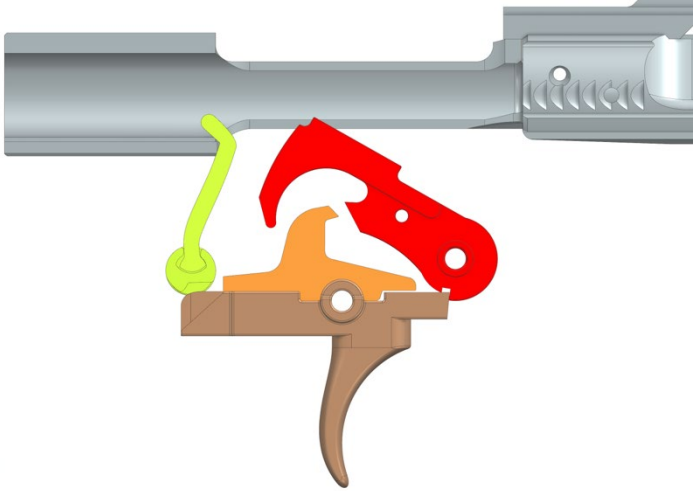
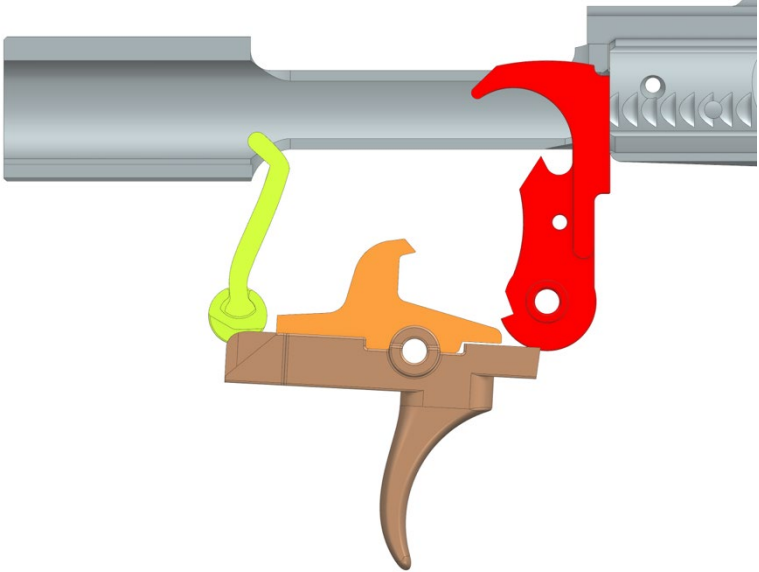
78. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

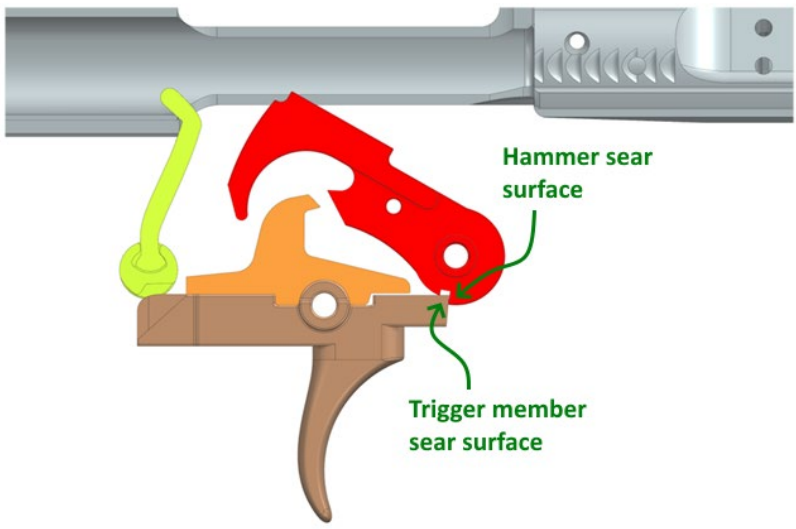
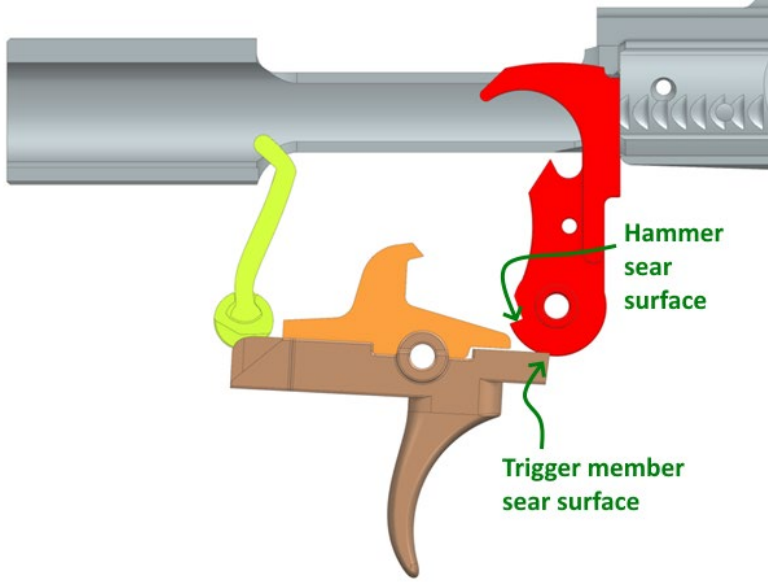
| '159 Patent Claim 1                                                                                          | The Super Safety                                                                                                                                                                           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

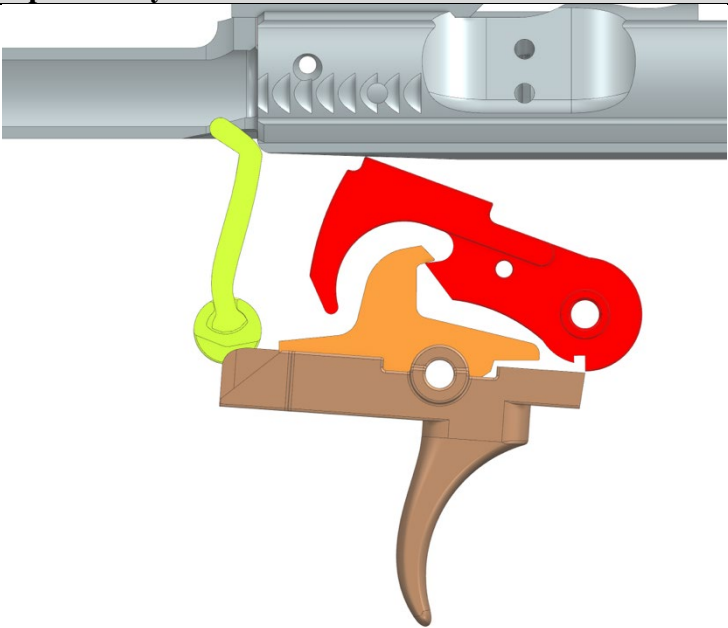
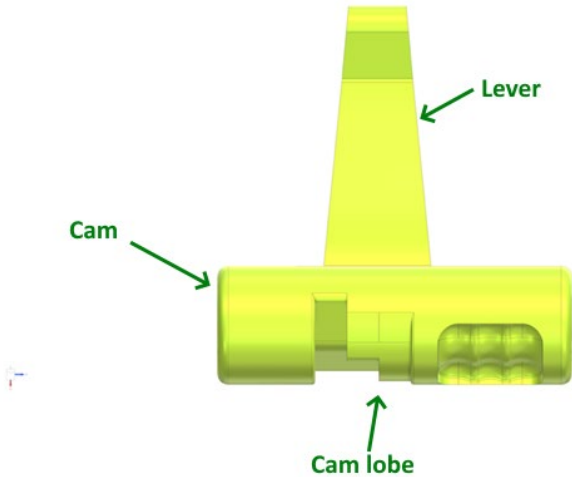
| '159 Patent Claim 1                                                                                                                                                | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>means, the trigger mechanism operable in a first, standard semi-automatic mode and in a second, forced reset semi-automatic mode, the mechanism comprising:</p> | <div data-bbox="745 228 1218 701"></div> <div data-bbox="888 718 1075 758"><b>Super Safety</b></div> <div data-bbox="574 768 1393 846"><p>Super Safety 3D Printed Active Trigger System v4.4,<br/>Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12</p></div> <div data-bbox="849 858 1109 1220"></div> <div data-bbox="919 1239 1049 1266"><p>★★★★★</p></div> <div data-bbox="954 1281 1015 1308"><p>GMR</p></div> <div data-bbox="867 1318 1101 1379"><p><b>Kit A -<br/>4140/Legacy/Curved</b></p></div> <div data-bbox="945 1383 1023 1409"><p>\$100.00</p></div> <div data-bbox="612 1436 1357 1474"><p><a href="https://greymarketresearch.net/kit-a-4140-legacy-curved/">https://greymarketresearch.net/kit-a-4140-legacy-curved/</a></p></div> |

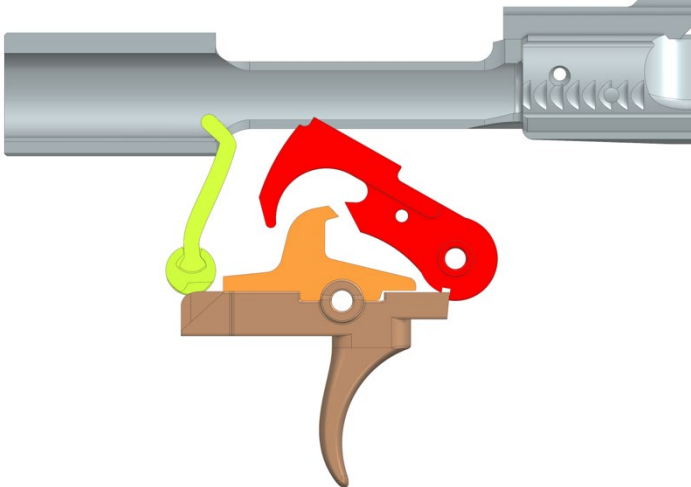
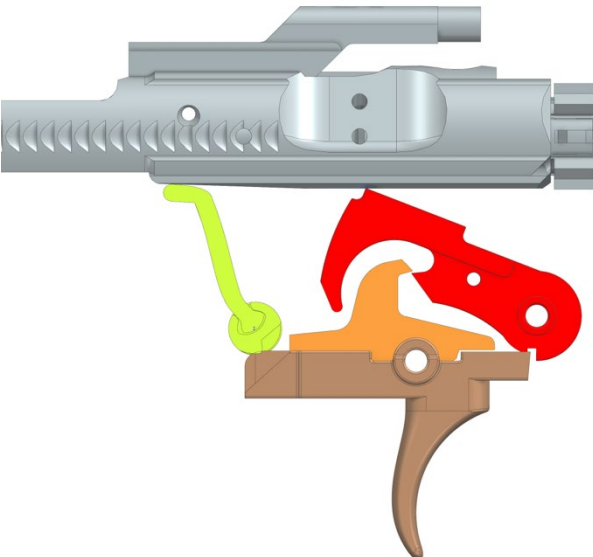
| '159 Patent Claim 1                                                                                                                                                   | The Super Safety                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                       |  <p style="text-align: center;"><b>Super Safety (Installed)</b><br/>(Plaintiff-generated renderings of the Super Safety here and below)</p>                                                                                                                             |
| <p>a hammer having a sear surface and a hook for engaging a disconnector and adapted to be mounted in a fire control mechanism pocket of a receiver</p>               | <p>The Super Safety (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear surface and a hook for engaging a disconnector (orange).</p>  <p style="text-align: center;"><b>Super Safety (Installed)</b></p> |
| <p>to pivot on a transverse hammer pivot axis between set and released positions, the hammer adapted to be pivoted rearward by rearward movement of a bolt means,</p> | <p>The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt means.</p>                                                                                                                                                   |

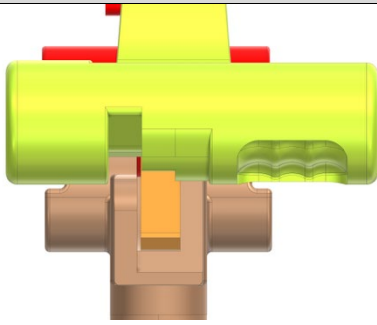
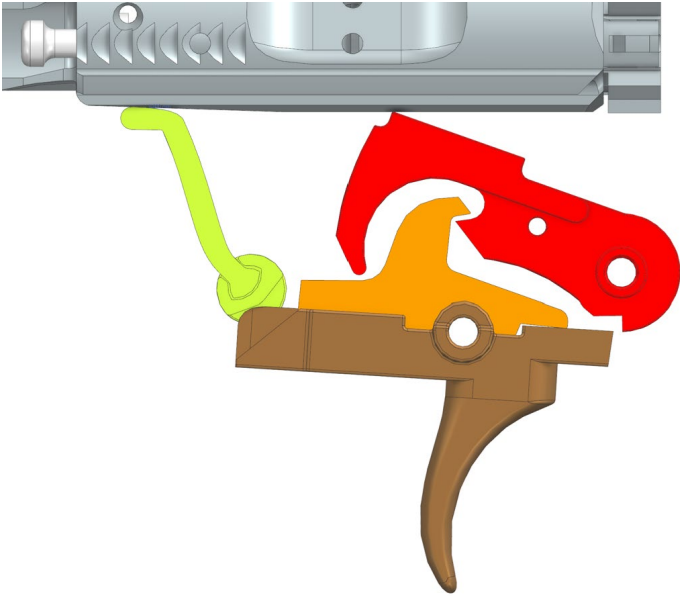
| '159 Patent Claim 1                                                                                                                                                     | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                         |  <p data-bbox="841 657 1130 688"><b>Hammer Set Position</b></p>  <p data-bbox="802 1362 1169 1394"><b>Hammer Released Position</b></p> <p>The top diagram, labeled 'Hammer Set Position', shows a cross-section of a firearm's internal mechanism. A red hammer is in a cocked position, held by a yellow Super Safety. An orange trigger member is positioned below the hammer. A green line points to the hammer, and another green line points to the pivot axis where the hammer meets the trigger member. The bottom diagram, labeled 'Hammer Released Position', shows the same mechanism with the hammer moved forward, ready to strike the firing pin.</p> |
| <p>a trigger member having a trigger sear surface and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis</p> | <p>The Super Safety (yellow) is installed with a trigger member (brown) in the fire control mechanism pocket and the trigger member pivots on a transverse trigger member pivot axis between set and released positions. The trigger member has a sear surface.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

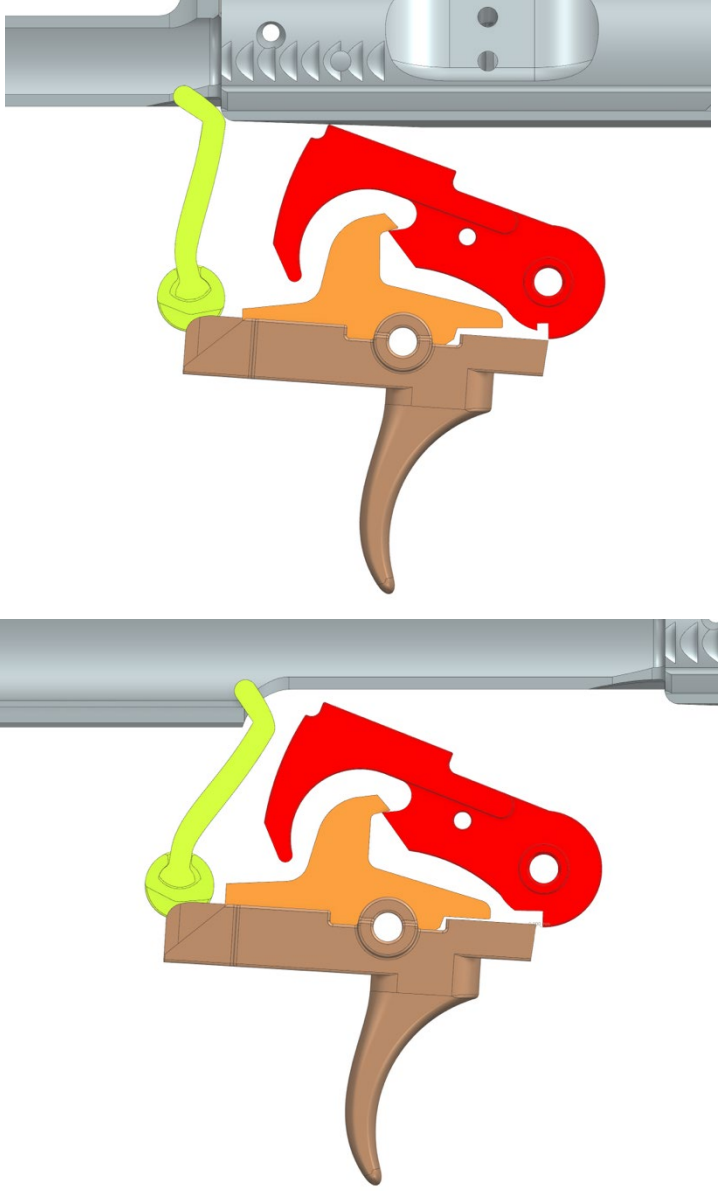
| '159 Patent Claim 1                                                                                                                            | The Super Safety                                                                                                                                         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

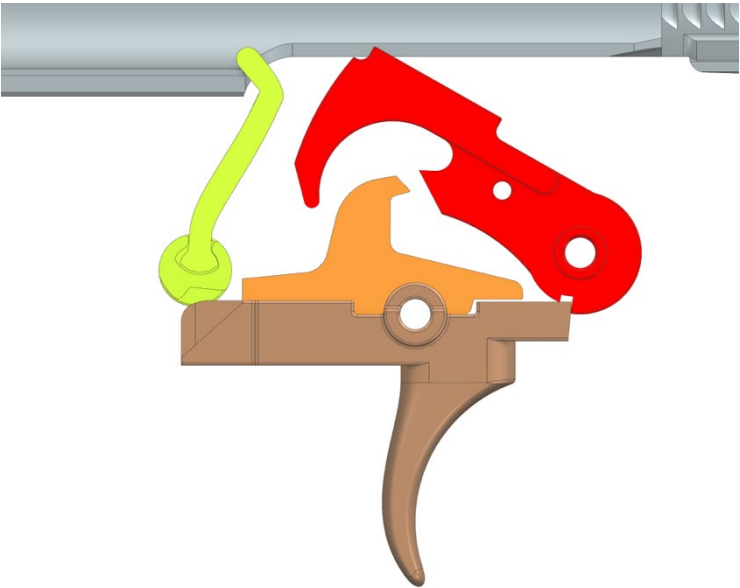
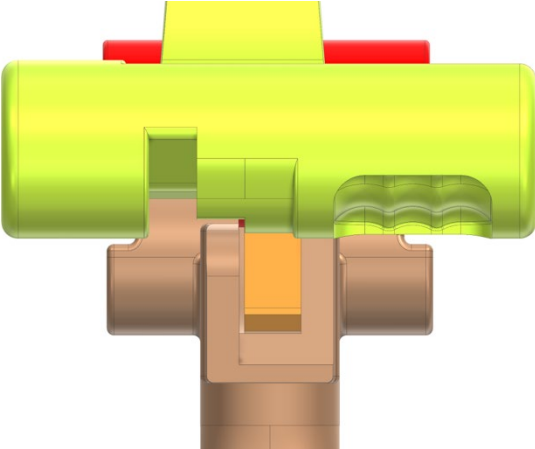
| '159 Patent Claim 1                                                                                                                        | The Super Safety                                                                                                                                             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

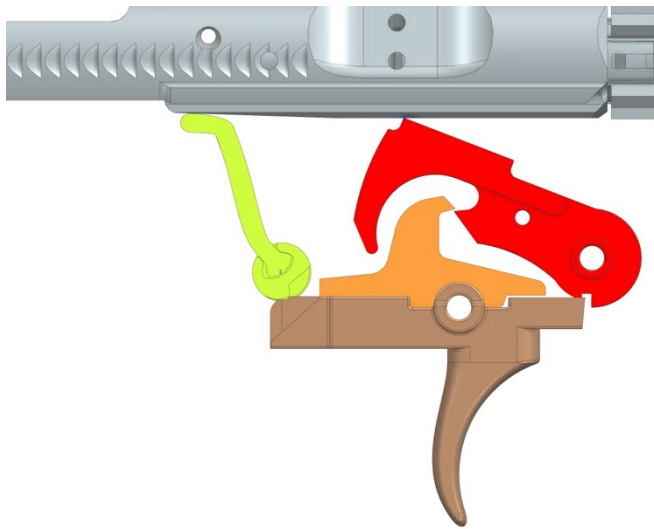
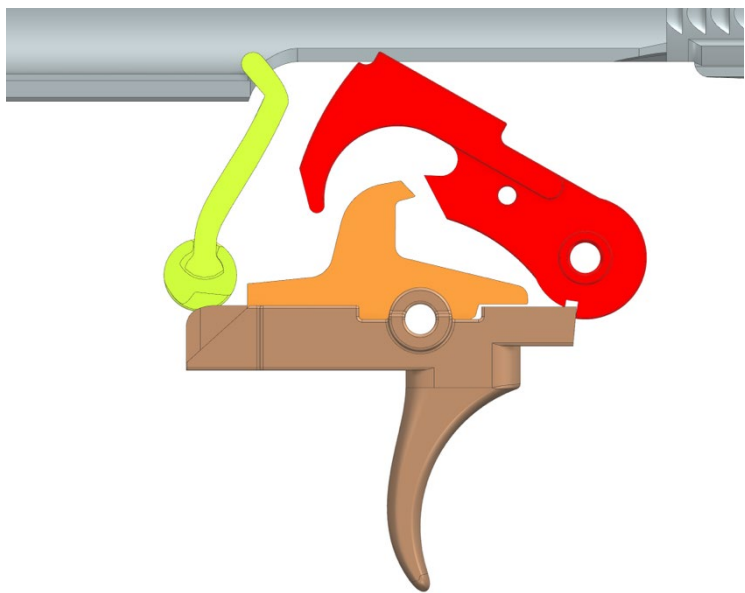
| '159 Patent Claim 1                                                                                                  | The Super Safety                                                                                                                                                                   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

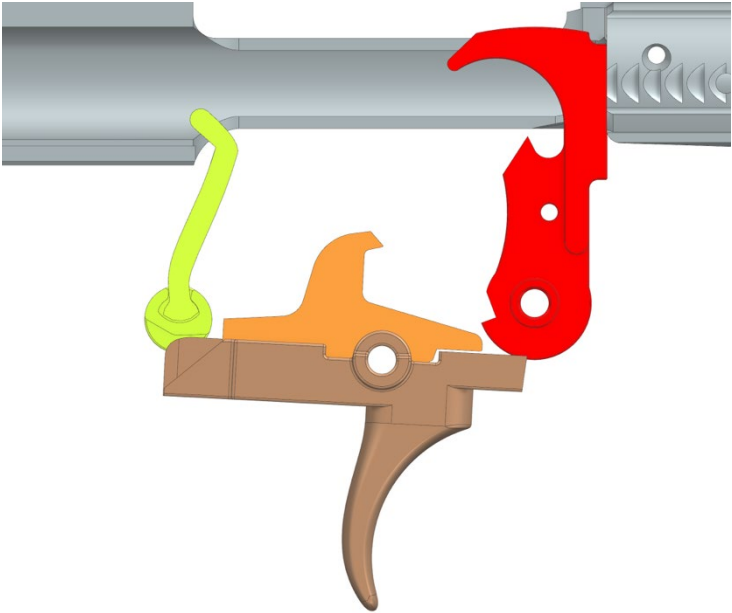
| '159 Patent Claim 1                            | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>trigger member toward the set position,</p> | <div data-bbox="646 233 1333 716">  </div> <p data-bbox="787 741 1182 772" style="text-align: center;"><b>Cam and Lobe First Position</b></p> <p data-bbox="553 793 1406 898">In the second position, the cam lobe forces the trigger member (brown) toward the set position when the cam is in the forced reset semi-automatic mode.</p> <div data-bbox="646 919 1235 1472">  </div> <p data-bbox="771 1497 1198 1528" style="text-align: center;"><b>Cam and Lobe Second Position</b></p> |
| <p>whereupon in the first mode,</p>            | <p>While in the first (standard semi-automatic) mode,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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

| '159 Patent Claim 1                                                                                                                                                                                                                  | The Super Safety                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                      |  <p data-bbox="683 1461 1289 1497"><b>Pressure on Trigger Member Prevents Reset</b></p>                                                                                                              |
| <p>at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnector to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger</p> | <p>at which time a user must manually reduce pressure on the trigger member (brown) to free the hammer (red) from the disconnector (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm.</p> |

| '159 Patent Claim 1                                                                                                                                                                                                                                  | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| member to fire the firearm, and                                                                                                                                                                                                                      |  <p data-bbox="634 852 1338 890"><b>Reduced Pressure on Trigger Member Allows Reset</b></p>                                                                                                                                                                                                                                                                               |
| <p data-bbox="201 911 527 978">whereupon in a second mode,</p> <p data-bbox="201 1423 527 1675">rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnector hook is prevented from holding the hammer,</p> | <p data-bbox="553 911 1273 940">When in the second (forced reset semi-automatic) mode,</p>  <p data-bbox="553 1423 1409 1566">Rearward movement of the bolt means causes rearward pivoting of the hammer (red) and the cam to force the trigger member toward the reset position such that the disconnector (orange) hook is prevented from holding the hammer hook.</p> |

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

| '159 Patent Claim 1 | The Super Safety                                                                   |
|---------------------|------------------------------------------------------------------------------------|
|                     |  |

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

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

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

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

82. Defendant has 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, Defendant has known or should have known that its 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. Defendant could not reasonably or subjectively believe that its actions do not constitute infringement of the '159 Patent, nor could it reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Defendant has continued its infringing activities. As such, Defendant willfully infringes the '159 Patent.

83. By its actions, Defendant has injured Plaintiffs and are liable to Plaintiffs for infringement of the '159 Patent pursuant to 35 U.S.C. § 271.

84. By its actions, Defendant's 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.

85. By its actions, Defendant's infringement of the '159 Patent has damaged and continues to damage, Plaintiffs in an amount yet to be determined.

86. Defendant's 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.

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

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

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

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

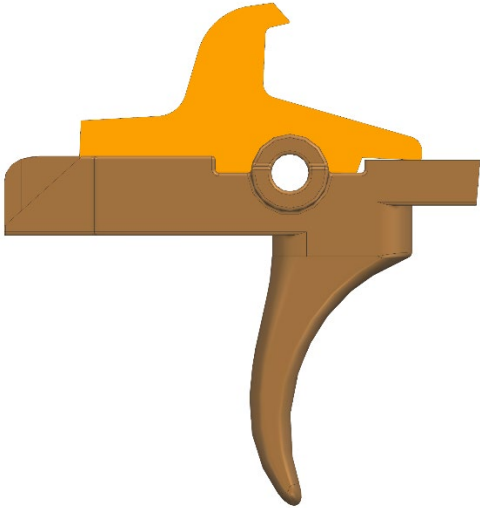
90. In violation of 35 U.S.C. § 271, Defendant has infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '403 patent, including but not limited to claim 38, literally and/or under the doctrine of equivalents, by among other things, making, using, offering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

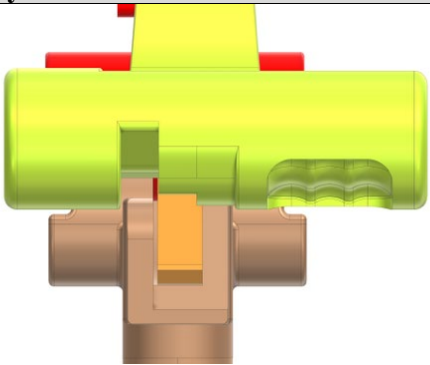
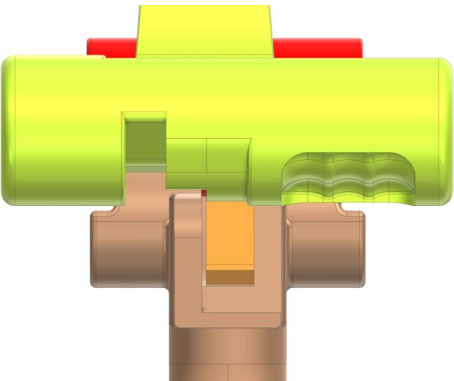
91. On information and belief, Defendant has and continues to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '403 patent, including but not limited to claim 38, literally and/or under the doctrine of equivalents.

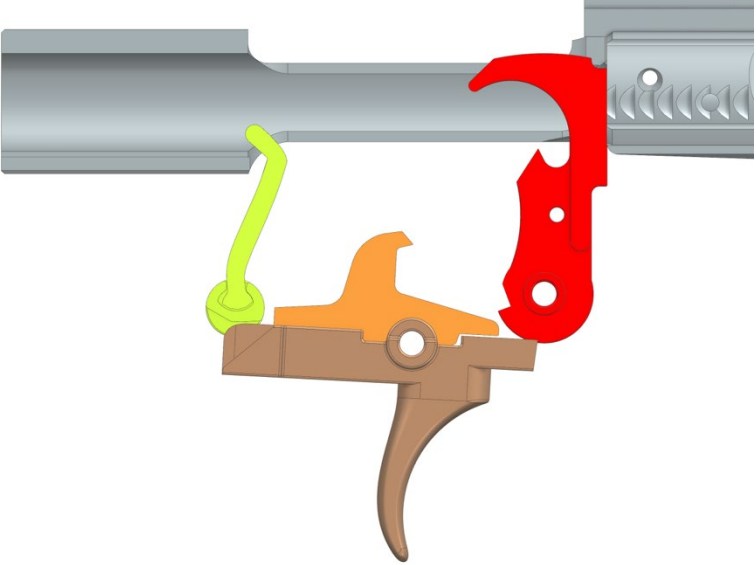
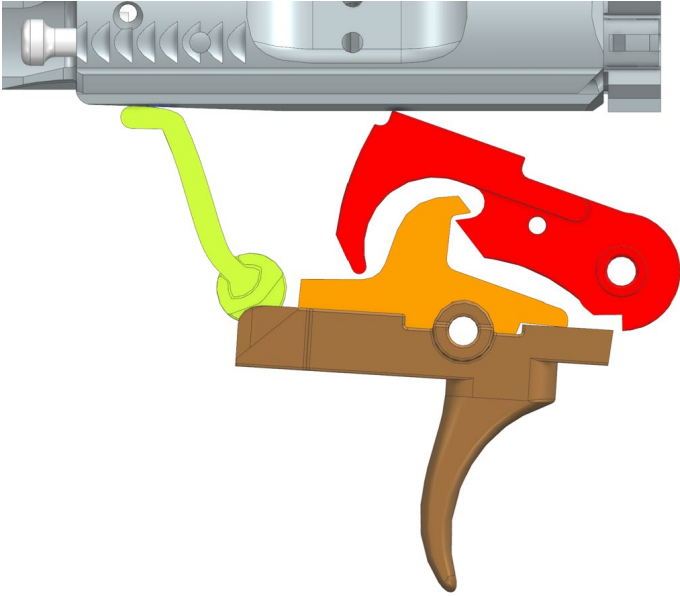
92. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 38 of the '403 patent is illustrated in the chart below:

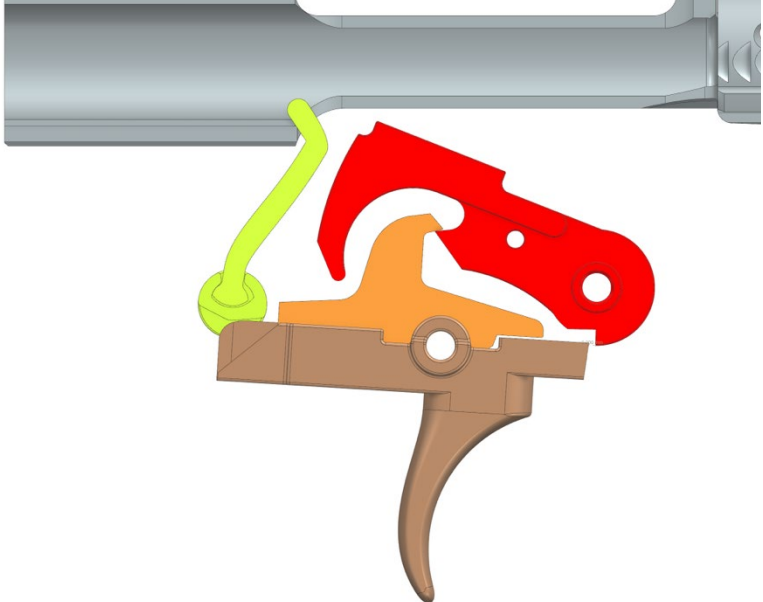
| '403 Patent Claim 38                              | The Super Safety                                                                                   |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------|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

| '403 Patent Claim 38                                                                  | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                       |  <p data-bbox="917 722 1091 758"><b>Super Safety</b></p> <p data-bbox="602 774 1406 846">Super Safety 3D Printed Active Trigger System v4.4,<br/>Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12</p>  <p data-bbox="954 1194 1057 1218">★★★★★</p> <p data-bbox="987 1234 1024 1251">GMR</p> <p data-bbox="911 1266 1101 1314"><b>Kit A -<br/>4140/Legacy/Curved</b></p> <p data-bbox="980 1323 1036 1339">\$100.00</p> <p data-bbox="641 1369 1370 1402"><a href="https://greymarketresearch.net/kit-a-4140-legacy-curved/">https://greymarketresearch.net/kit-a-4140-legacy-curved/</a></p> |
| a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis; | The Super Safety (yellow) is installed in a fire control mechanism pocket along with a hammer (red) that has a hammer hook and pivots on a transverse axis.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| '403 Patent Claim 38                                                                                                                                                                            | The Super Safety                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                 |  <p data-bbox="846 705 1167 741"><b>Super Safety (Installed)</b></p> <p data-bbox="594 758 1406 793">(Plaintiff-generated renderings of Super Safety here and below)</p>                                                                                                                   |
| <p data-bbox="204 814 509 993">a disconnect having a disconnect hook and adapted to pivot on a transverse disconnect pivot axis;</p> <p data-bbox="204 1010 488 1045">a trigger member; and</p> | <p data-bbox="594 814 1414 919">The Super Safety is installed along with a disconnect (orange) which has a disconnect hook and pivots on a transverse disconnect pivot axis, and a trigger member (brown)</p>  <p data-bbox="773 1465 1240 1501"><b>Disconnect and Trigger Member</b></p> |
| <p data-bbox="204 1522 553 1698">a safety selector adapted to be movable between a standard semi-automatic position and a forced reset semi-automatic position,</p>                             | <p data-bbox="594 1522 1354 1591">The Super Safety is a safety selector adapted to be movable between a standard semi-automatic position,</p>                                                                                                                                                                                                                                |

| '403 Patent Claim 38                                                                                                                                            | The Super Safety                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                 |  <p data-bbox="646 604 1367 676"><b>Super Safety (installed) in Standard Semi-Automatic Position</b></p> <p data-bbox="602 747 1198 783">. . . and a forced reset semi-automatic position,</p>  <p data-bbox="621 1188 1391 1260"><b>Super Safety (installed) in Forced Reset Semi-Automatic Position</b></p> |
| <p data-bbox="203 1283 537 1465">wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,</p> | <p data-bbox="594 1283 1404 1354">When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated.</p>                                                                                                                                                                                                                                                                                                                           |

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

| '403 Patent Claim 38 | The Super Safety                                                                                                                                       |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |  <p data-bbox="829 850 1179 882"><b>Pressure Must be reduced</b></p> |

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

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

95. On information and belief, Defendant also contributes to the infringement of the '403 Patent by others, including its customers. Acts by Defendant that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendant of the components of the Infringing Devices, such as the can and lever arm or the trigger assembly. The components are not suitable for substantial noninfringing use as they are specially

designed and adapted to be used in a fire control unit to forcibly reset a trigger mechanism and infringe the '403 Patent.

96. Defendant has 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, Defendant has known or should have known that its 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. Defendant could not reasonably or subjectively believe that its actions do not constitute infringement of the '403 Patent, nor could it reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that its actions constitute infringement, Defendant has continued its infringing activities. As such, Defendant willfully infringes the '403 Patent.

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

98. By its actions, Defendant's 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.

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

100. Defendant's 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.

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

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

**PRAYER FOR RELIEF**

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

- a. Each of the Asserted Patents has been and continues to be infringed by Defendant;
- b. Defendant's infringement of each of the Asserted Patents has been, and continues to be, willful;
- c. Each of the Asserted Patents is enforceable and not invalid;
- d. A preliminary injunction enjoining Defendant and its principals, agents, successors, assigns, attorneys, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement or contributing to the infringement of each of the Asserted Patents during the pendency of this case, or other such equitable relief as the Court determines is warranted;
- e. A permanent injunction enjoining Defendant and its principals, agents, successors, assigns, attorneys, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement or contributing to the infringement of each of the Asserted Patents, or other such equitable relief as the Court determines is warranted;
- f. An award of damages adequate to compensate Plaintiffs for the infringement of each of the Asserted Patents that has occurred, together with pre-judgment interests and costs, post-judgment interests and costs, and an accounting;

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

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

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

**DEMAND FOR JURY TRIAL**

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

DATED: June 17, 2026

Respectfully submitted,

/s/ Nathan Nicholas

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on June 17, 2026, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Nathan Nicholas  
Signee