

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

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

and

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

Plaintiffs.

v.

**Eye Candy Custom Firearms LLC, a
Florida limited liability company,**

and

Paul Zonghetti, an individual,

Defendants.

CASE NO. _____

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

This is an action for patent infringement in which ABC IP LLC (“ABC”), Rare Breed Triggers, Inc. (“Rare Breed”) (collectively, “Plaintiffs”) accuse Eye Candy Custom Firearms LLC and Paul Zonghetti (collectively, “Defendants”) 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, Eye Candy Custom Firearms LLC is a limited liability company organized under the laws of Florida with an address of 3210 Maple Run, Kissimmee, FL 34744.

4. Upon information and belief, Paul Zonghetti is an individual residing at 3210 Maple Run, Kissimmee, FL 34744, who is the owner or an owner of Eye Candy Custom Firearms LLC and directs its operations, including directing Eye Candy Custom Firearms LLC to sell products in violation of the Asserted Patents.

JURISDICTION AND VENUE

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

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

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

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

BACKGROUND

9. 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”).

10. 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.

11. 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.

12. 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.

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

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

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

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

17. 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.

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

THE INVENTIONS

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

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

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

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

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

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

THE INFRINGING DEVICES

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

I. The Super Safety

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

29. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the Super Safety, in multiple variants, including at least:

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

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

30. An exemplary image is shown below:



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

II. The Atrius Selector

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

33. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the Atrius Selector in multiple variants, including at least:

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

34. An exemplary image is shown below:



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

III. The Kabuto

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

37. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the Kabuto.

38. An exemplary image is shown below:



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

COUNT I — INFRINGEMENT OF THE '247 PATENT

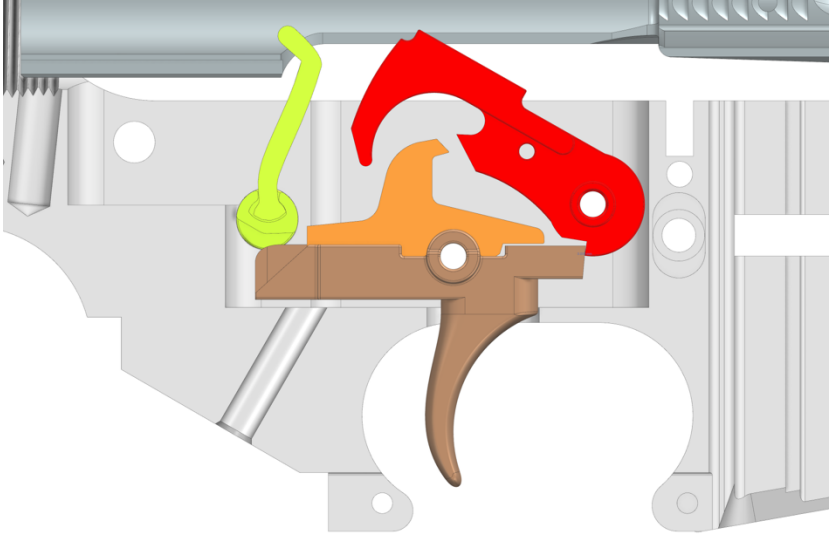
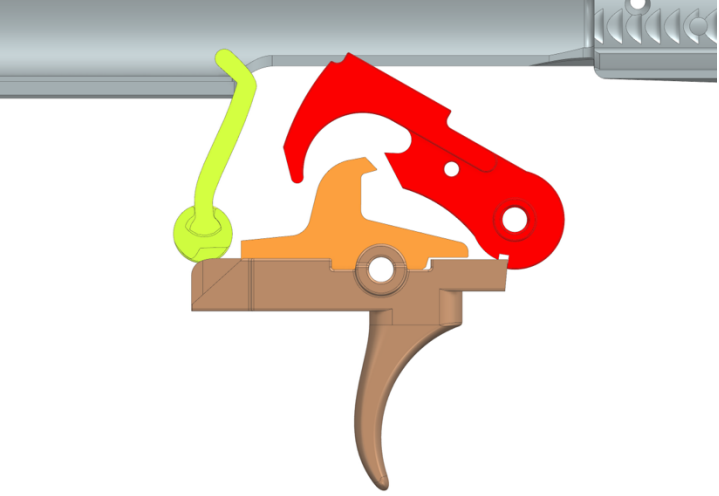
40. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

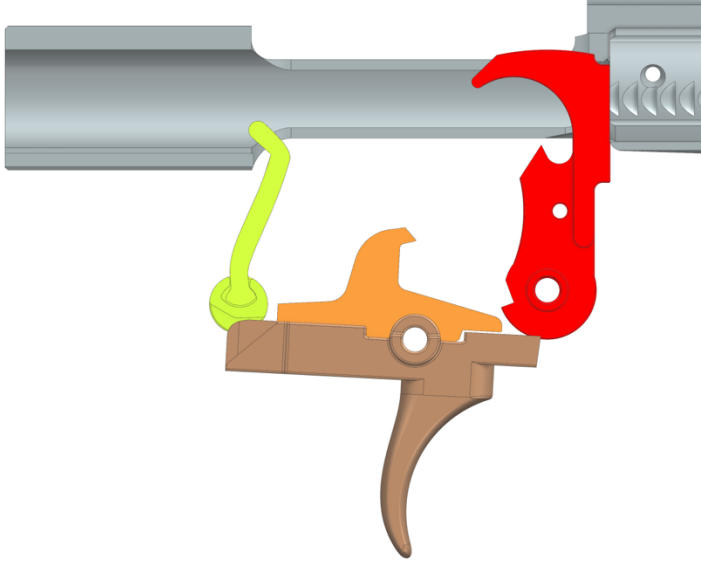
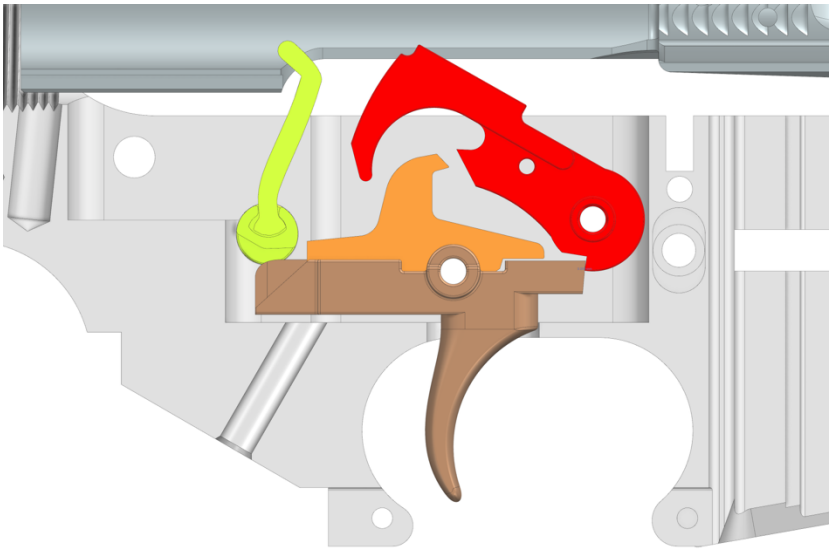
41. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents, by among other things, making, using,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

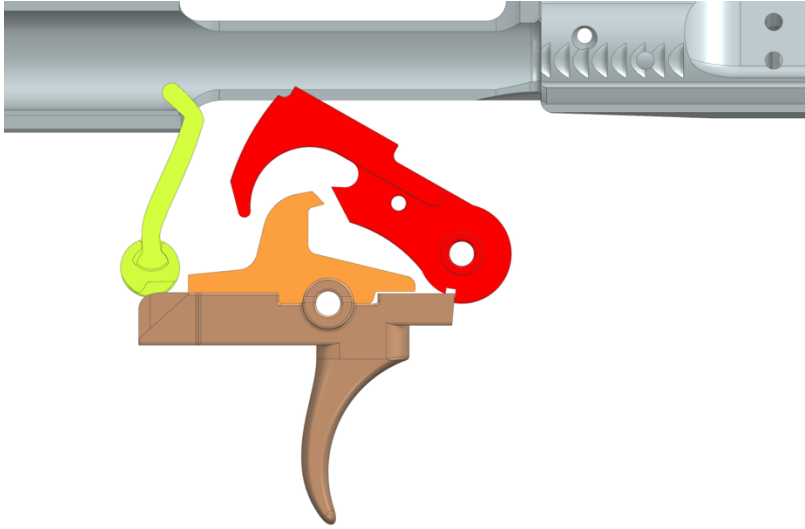
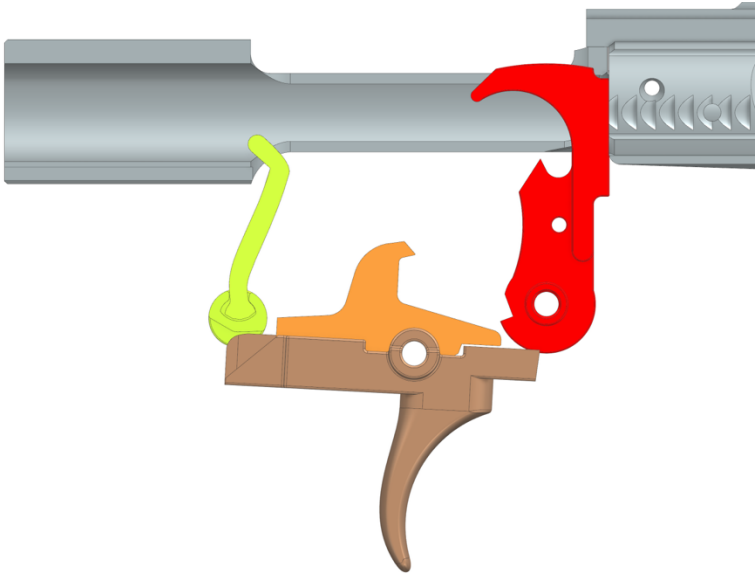
42. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '247 Patent, including but not limited to claim 15, literally and/or under the doctrine of equivalents.

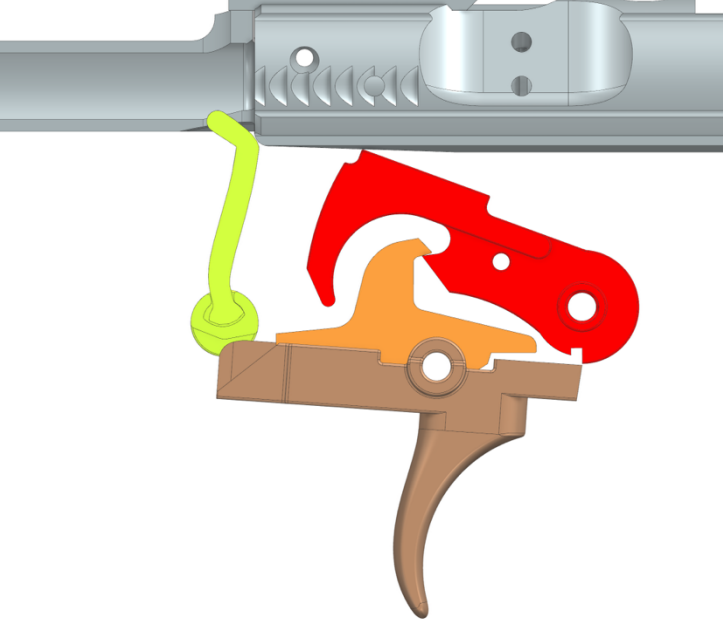
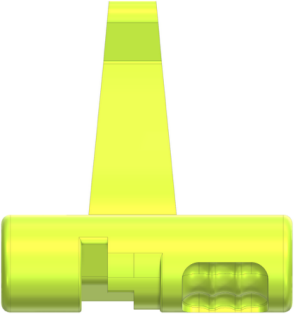
43. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

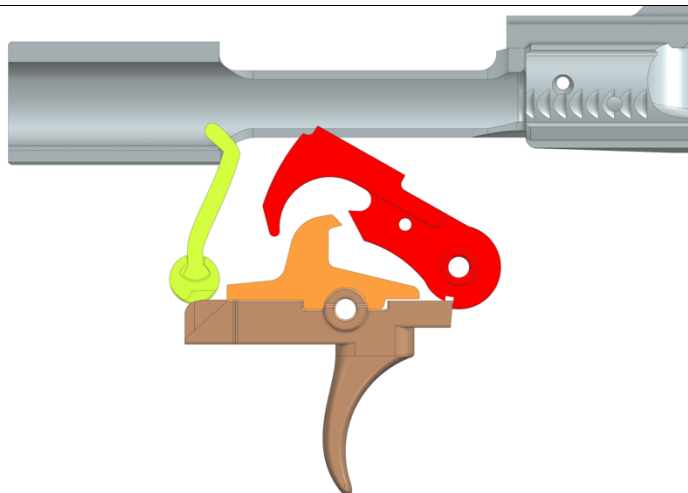
'247 Patent, Claim 15	The Super Safety
15. A firearm trigger mechanism comprising:	When installed and used as directed, the Super Safety is part of a trigger mechanism and functions as a cam that in at least one mode, both causes the reset of the trigger and locks the trigger during the cycle of operation. The Super Safety <i>See also, Ex. F, Super Safety 3D Printed Active Trigger System v4.4, ("Super Safety Guide") at 12.</i>
a hammer having a sear catch and a hook for engaging a disconnecter and adapted to be mounted in a fire control mechanism pocket of a receiver	The Super Safety (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear catch and a hook for engaging a disconnecter (orange).

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

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

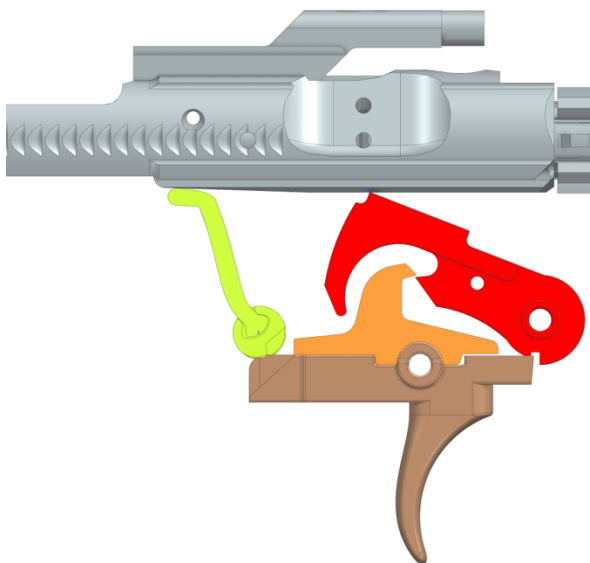
wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member	The sear of the trigger member (brown) and sear catch of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.  Trigger Member Set Position
and are out of engagement in said released positions of said hammer and trigger member,	The sear of the trigger member (brown) and sear catch of the hammer (red) are out of engagement in the released position.  Trigger Member Released Position
said disconnecter having a hook for engaging said hammer and adapted to be mounted in the fire control mechanism pocket to pivot	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).

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



Cam and Lobe First Position

In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.



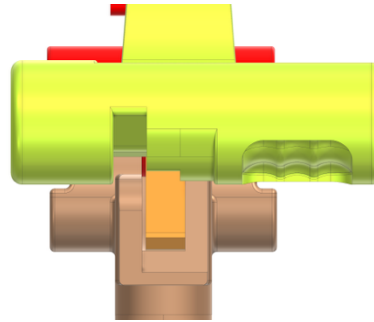
Cam and Lobe Second Position

whereupon in a standard semi-automatic mode,

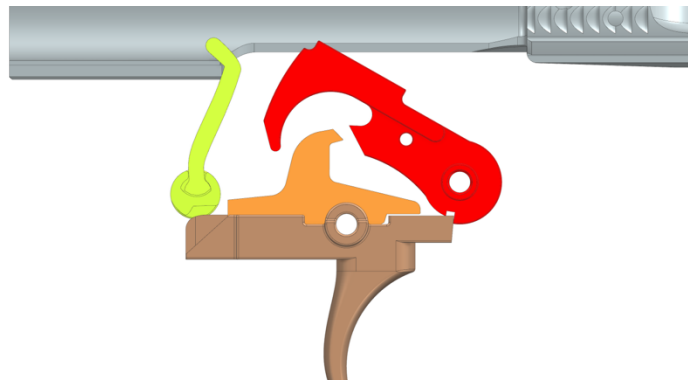
said cam is in said first position,

rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnecter hook catches said hammer hook,

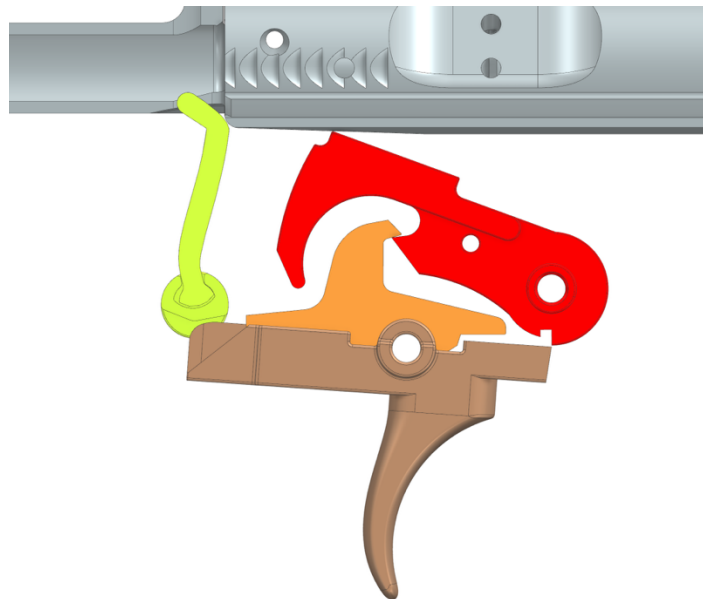
During at least part of the cycle in the standard semi-automatic mode,



. . . the cam is in the first position.

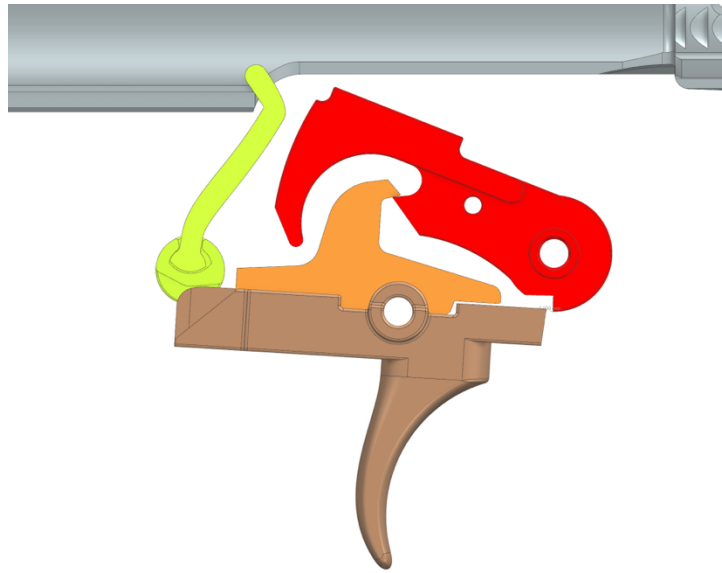


Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.



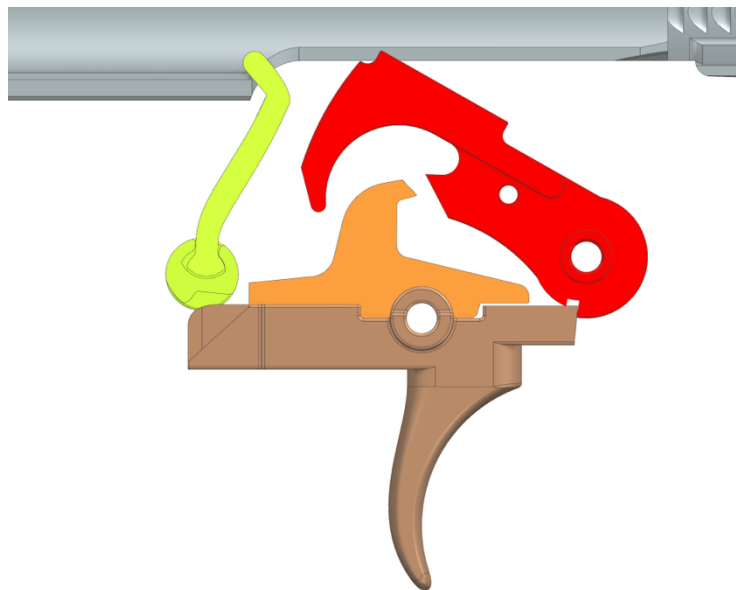
and thereafter the bolt carrier moves forward into battery,

Thereafter, the bolt carrier moves forward into battery,



at which time a user must manually release said trigger member to free said hammer from said disconnector to permit said hammer and trigger member to pivot to said set positions so that the user can pull said trigger member to fire the firearm, and

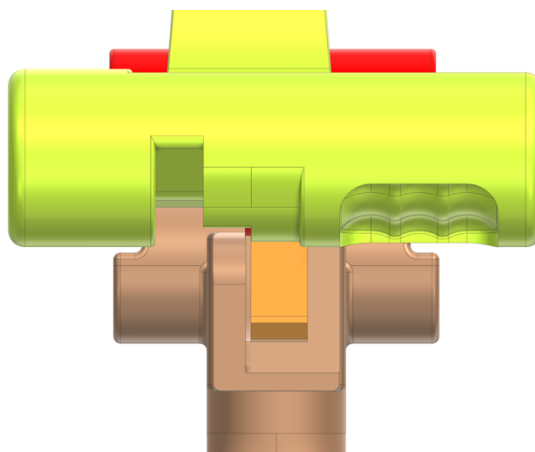
. . . at which time a user must manually release the trigger member (brown) to free said hammer (red) from the disconnector (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm.



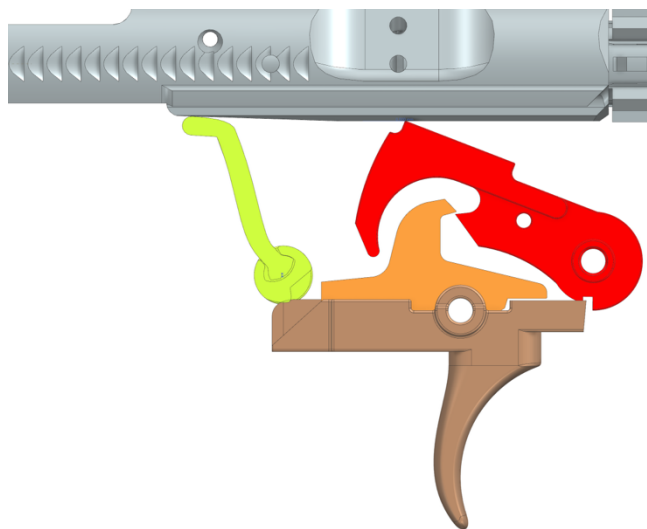
whereupon in a forced reset semi-automatic mode,

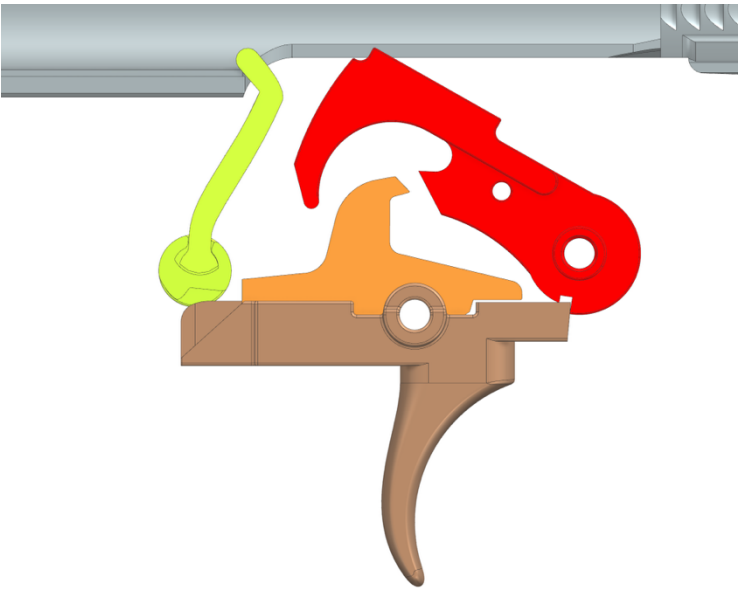
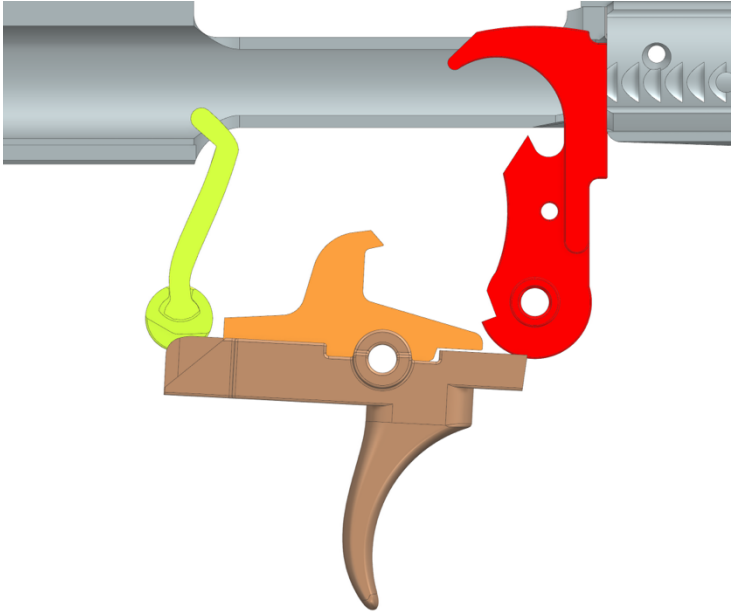
said cam is in said second position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnector hook is prevented from catching said hammer hook,

When in the “forced reset” semi-automatic mode,



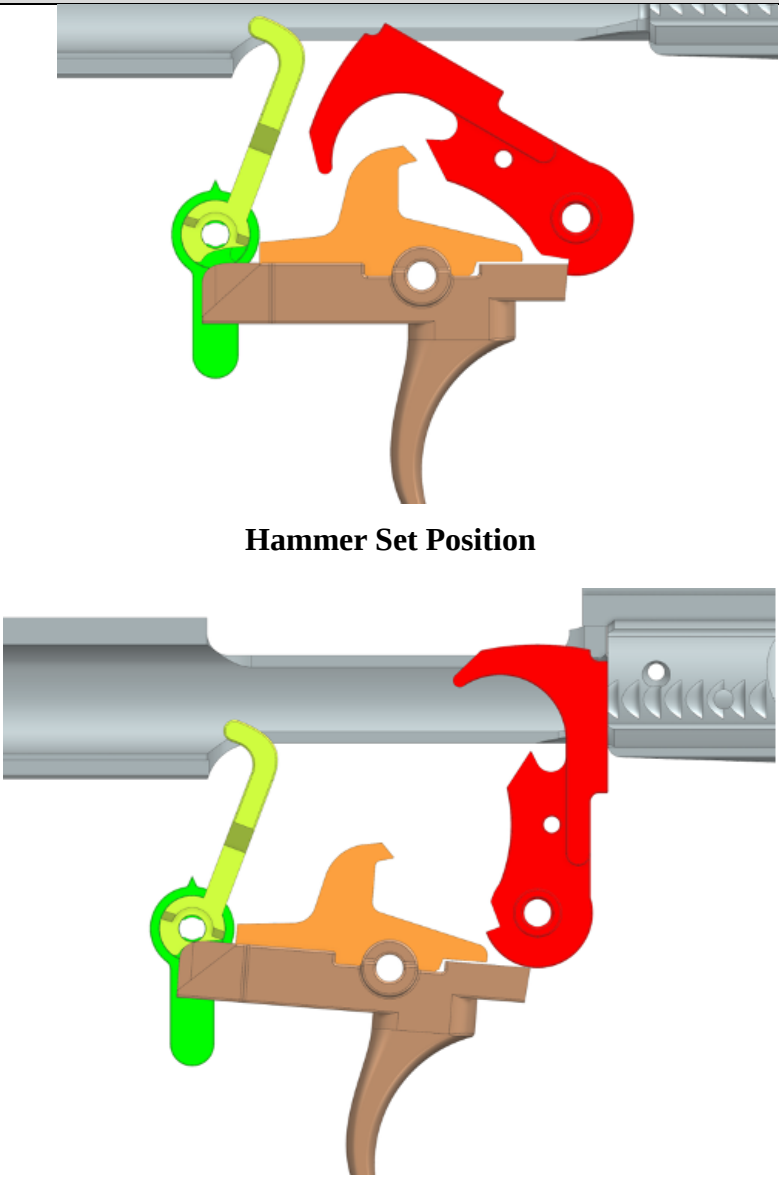
. . . the cam is in the second position during at least part of the cycle and mechanically moves the trigger member toward the set position. Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnector (orange) hook is prevented from catching the hammer hook.

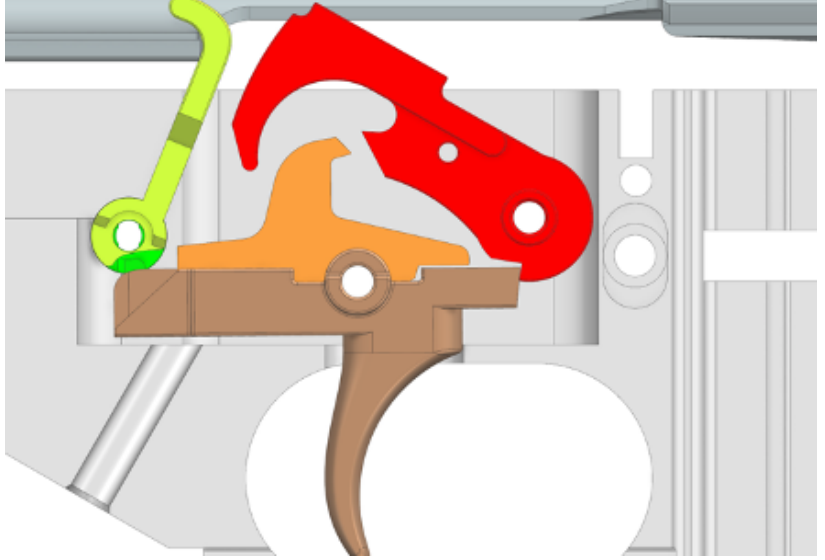
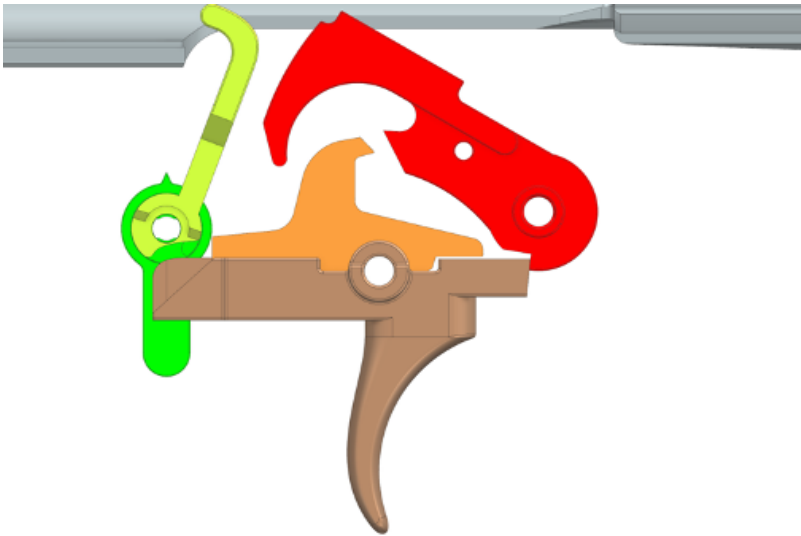


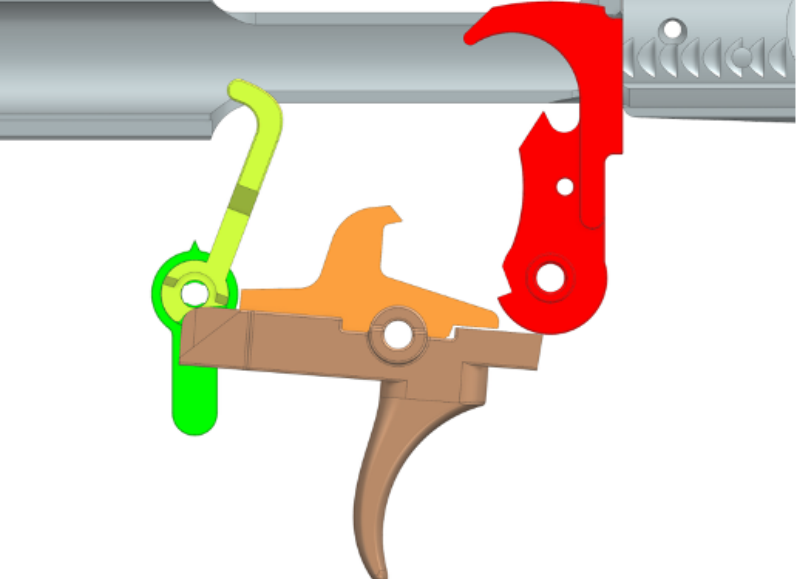
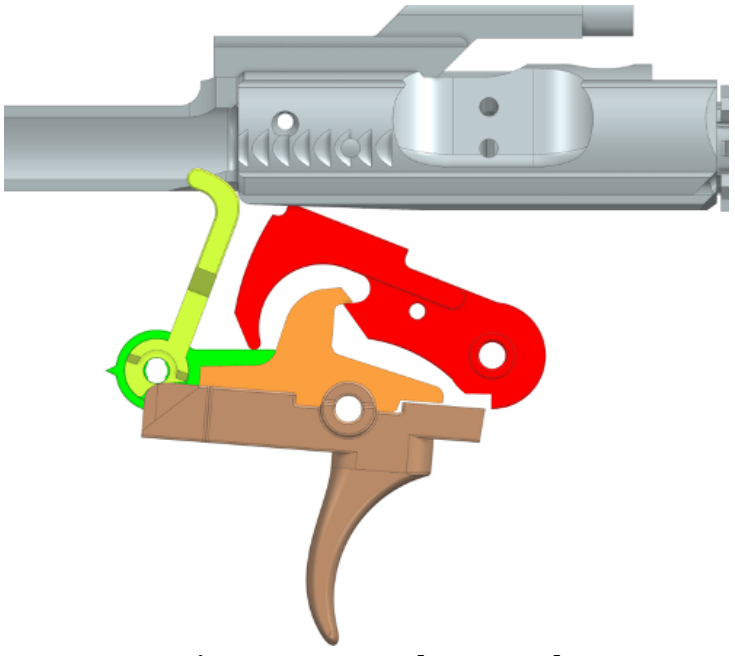
and thereafter the bolt carrier moves forward into battery,	Thereafter, the bolt carrier moves forward into battery, 
at which time the user can pull said trigger member to fire the firearm.	. . . at which time the user can pull the trigger member (brown) to fire the firearm. 

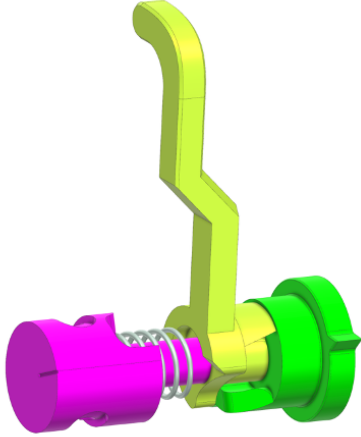
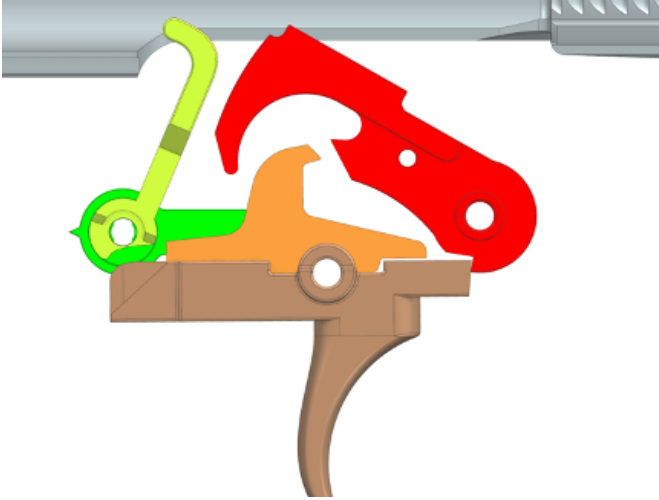
44. An exemplary comparison of the Atrius Selector, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

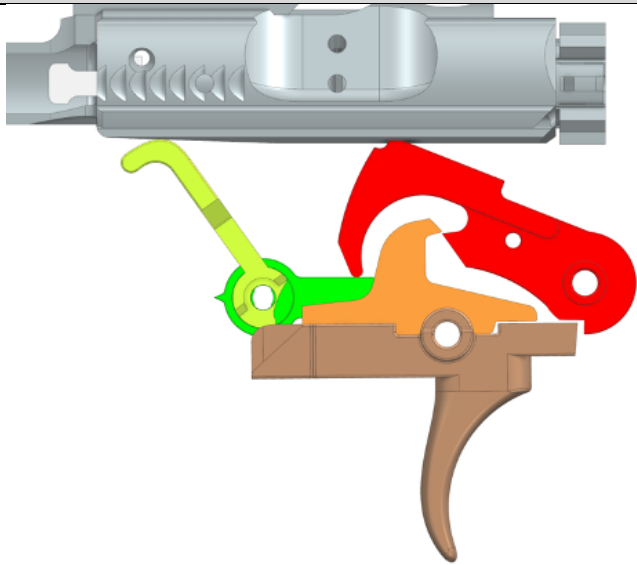
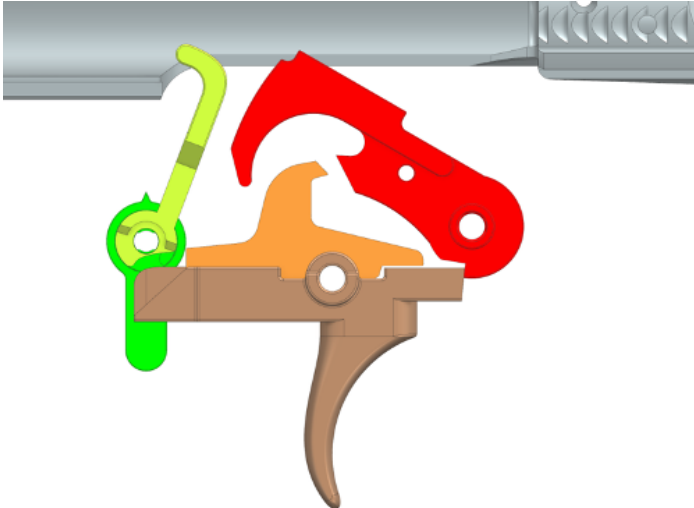
'247 Patent, Claim 15	The Atrius Selector
15. A firearm trigger mechanism comprising:	When installed and used as directed, the Atrius Selector is part of a trigger mechanism and functions as a cam that in at least one mode, both causes the reset of the trigger and locks the trigger during the cycle of operation. Atrius Selector
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 Atrius Selector (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear catch and a hook for engaging a disconnecter (orange). (Plaintiff-generated renderings of Atrius Selector here and below)
to pivot on a transverse hammer pivot axis between set and released positions, said hammer adapted to be pivoted rearward by	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt carrier.

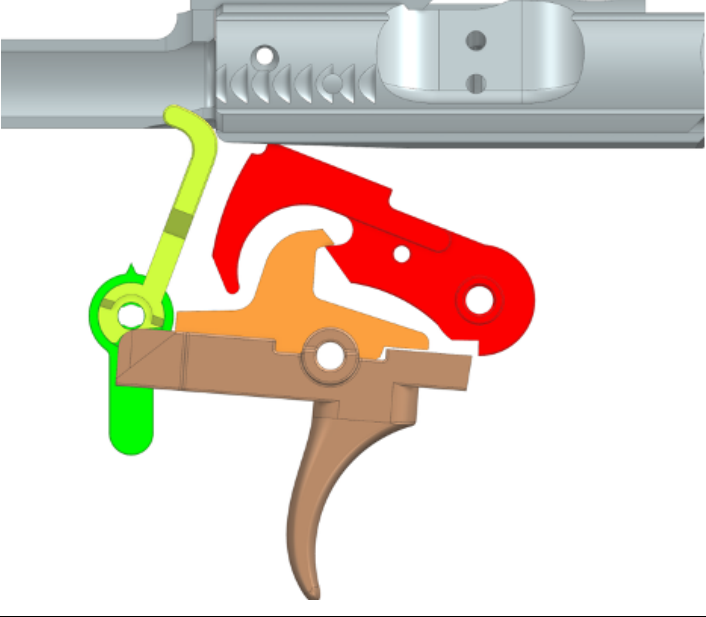
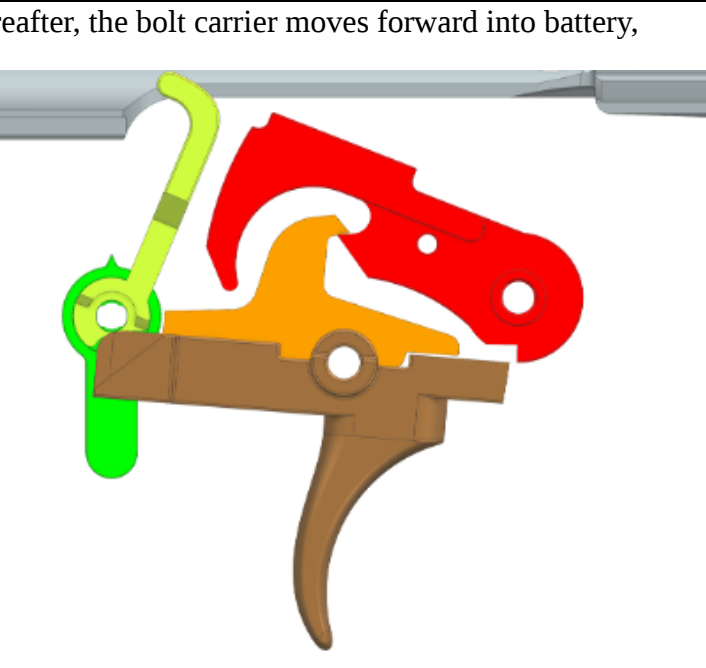
'247 Patent, Claim 15	The Atrius Selector
rearward movement of a bolt carrier,	 The top diagram, labeled "Hammer Set Position", shows a cross-section of the hammer mechanism. A yellow Atrius Selector is in the set position, with its hook engaged with the hammer (orange) and the trigger member (brown). A red component is also visible. The bottom diagram, labeled "Hammer Released Position", shows the same mechanism with the hammer released, and the yellow Atrius Selector and red component in a different position relative to the hammer and trigger member. Hammer Set Position Hammer Released Position
a trigger member having a sear and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and released positions,	The Atrius Selector (yellow) is installed with a trigger member (brown) in the fire control mechanism pocket that pivots on a transverse trigger member pivot axis between set and released positions and has a sear. The trigger member (brown) has a sear.

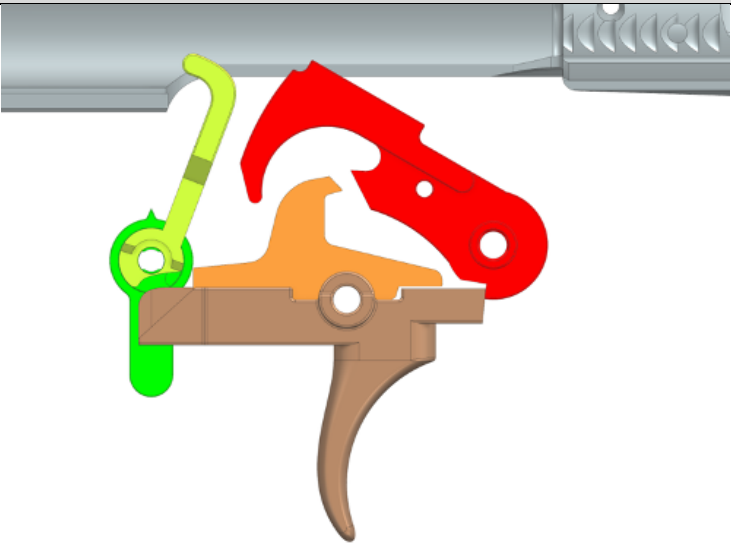
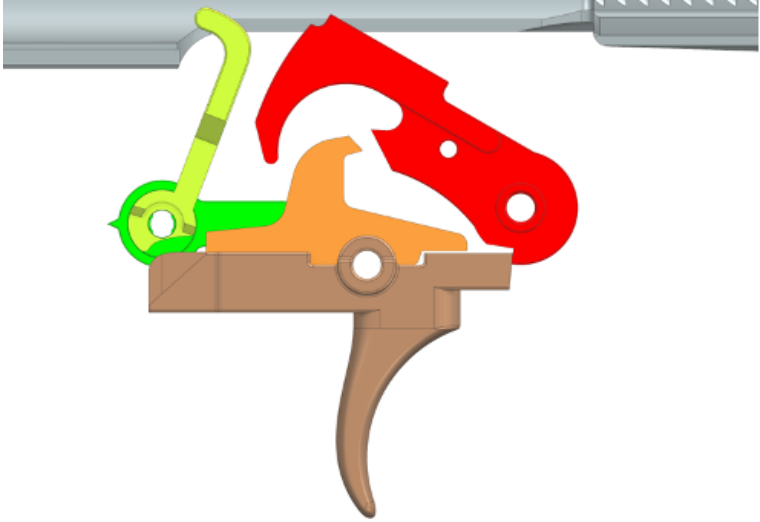
'247 Patent, Claim 15	The Atrius Selector
	
wherein said sear and sear catch are in engagement in said set positions of said hammer and trigger member	The sear of the trigger member (brown) and sear catch of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.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

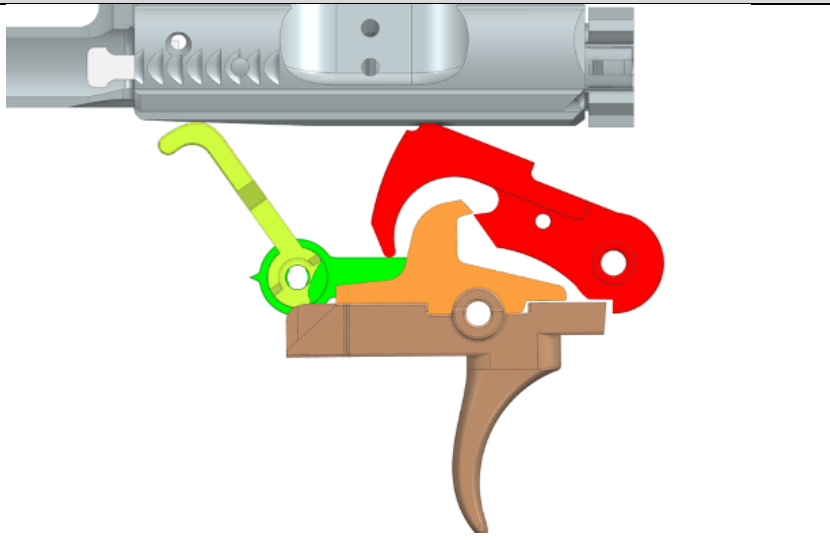
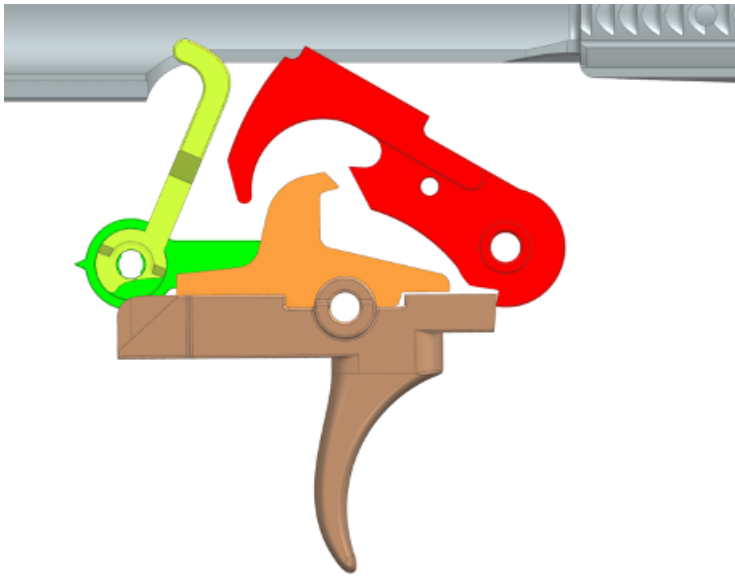
'247 Patent, Claim 15	The Atrius Selector
	 Trigger Member Released Position
said disconnecter having a hook for engaging said hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis,	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).  Disconnecter Hook Engaged
and a cam having a cam lobe and adapted to be movably mounted in the	The Atrius Selector has a cam and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting Atrius Selector, shown in yellow, in fire control mechanism pocket).

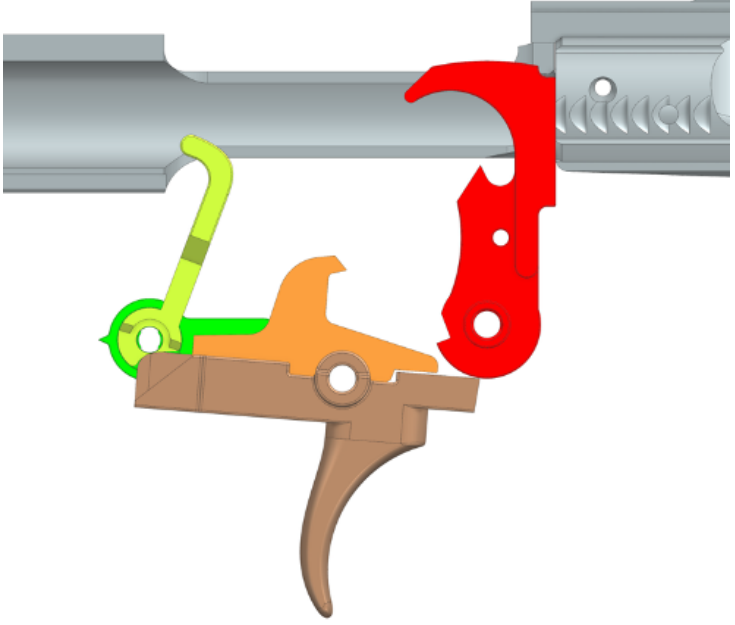
'247 Patent, Claim 15	The Atrius Selector
fire control mechanism pocket,	 Atrius Selector Cam with Lobe and Lever
said cam being movable between a first position and a second position, in said second position said cam lobe forces said trigger member towards said set position,	The cam is movable between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

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

'247 Patent, Claim 15	The Atrius Selector
	
and thereafter the bolt carrier moves forward into battery,	Thereafter, the bolt carrier moves forward into battery, 
at which time a user must manually release said trigger member to free said hammer from said disconnector to permit said hammer and trigger member to pivot to said set positions so that the user can pull said trigger	. . . at which time a user must manually release the trigger member (brown) to free said hammer (red) from the disconnector (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm

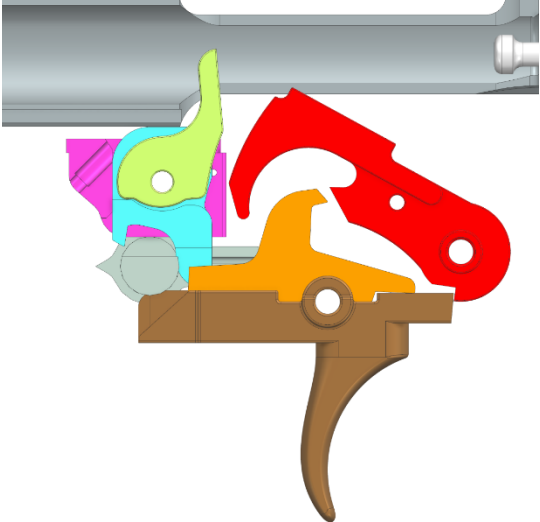
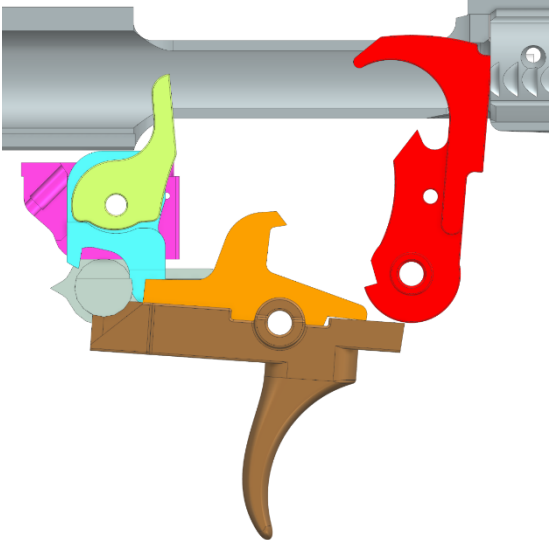
'247 Patent, Claim 15	The Atrius Selector
member to fire the firearm, and	
whereupon in a forced reset semi-automatic mode,	When in the “forced reset” semi-automatic mode, 
said cam is in said second position, rearward movement of the bolt carrier causes rearward pivoting of said hammer such that said disconnector hook is prevented from catching said hammer hook,	. . . the cam is in the second position during at least part of the cycle and mechanically moves the trigger member toward the set position. Rearward movement of the bolt carrier causes rearward pivoting of the hammer (red) such that the disconnector (orange) hook is prevented from catching the hammer hook.

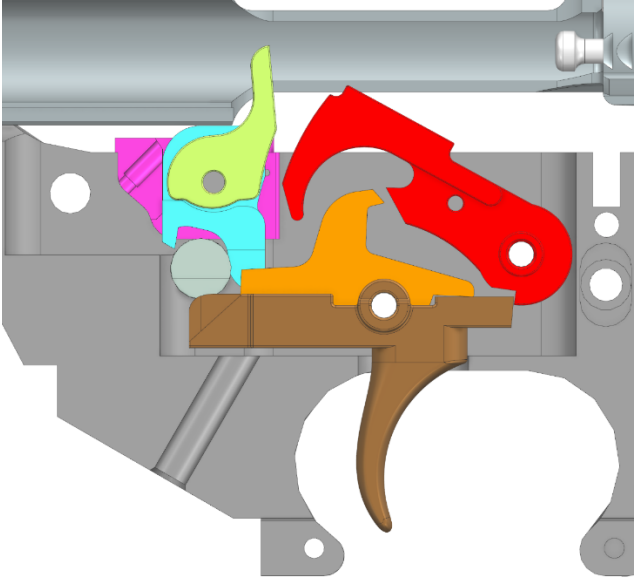
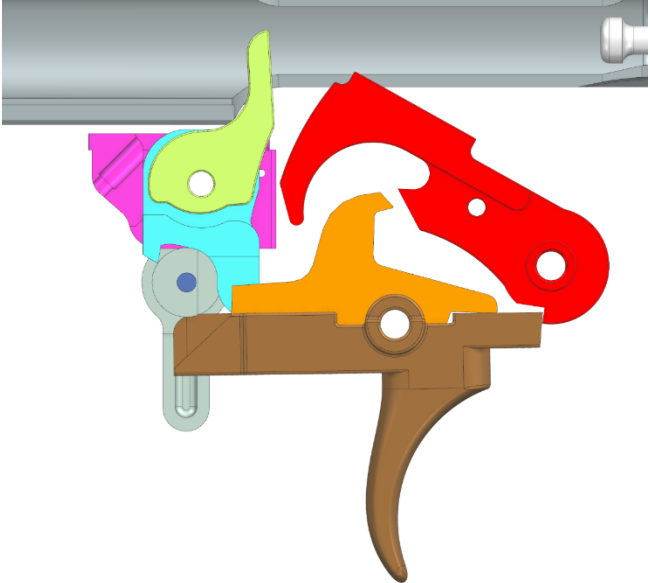
'247 Patent, Claim 15	The Atrius Selector
	 A side-view cross-sectional diagram of a firearm's bolt carrier assembly. The bolt carrier is shown in a retracted position, with its rear end facing right. The bolt is visible at the rear of the carrier. The carrier is connected to a trigger mechanism, which includes a red trigger, an orange trigger guard, and a green trigger spring. The bolt carrier is shown in a light blue color.
and thereafter the bolt carrier moves forward into battery,	Thereafter, the bolt carrier moves forward into battery,  A side-view cross-sectional diagram of the same firearm's bolt carrier assembly. The bolt carrier is shown in a forward position, having moved from its retracted position to its forward position. The bolt is now at the front of the carrier. The trigger mechanism remains in the same position. The bolt carrier is shown in a light blue color.

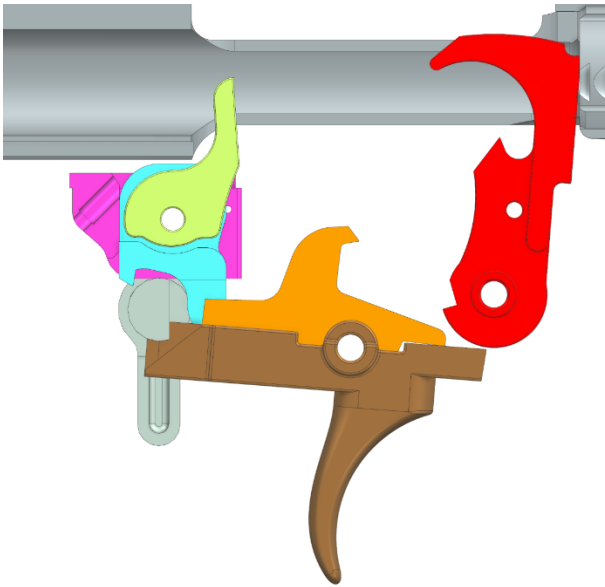
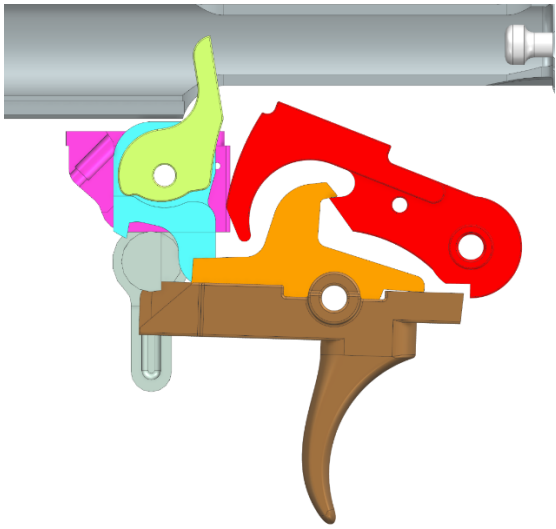
at which time the user can pull said trigger member to fire the firearm.	. . . at which time the user can pull said trigger member (brown) to fire the firearm. 
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45. An exemplary comparison of the Kabuto, when assembled and used as intended, with claim 15 of the '247 Patent, is illustrated in the chart below:

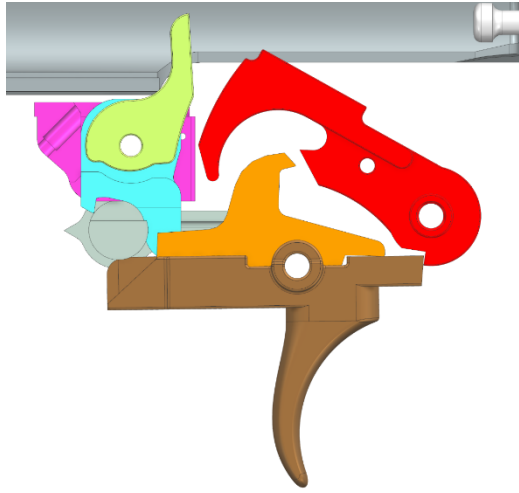
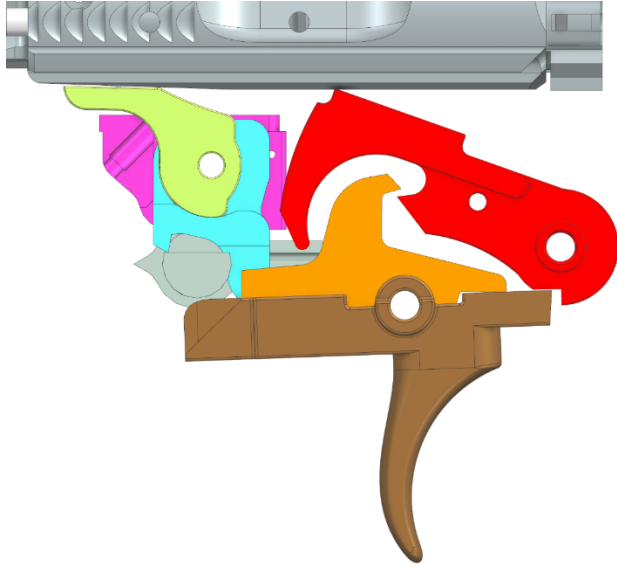
'247 Patent, Claim 15	The Kabuto
15. A firearm trigger mechanism comprising:	When installed and used as directed, the Kabuto is part of a reset trigger mechanism and functions as a cam that in at least one mode, both causes the reset of the trigger and locks the trigger during the cycle of operation. Kabuto
a hammer having a sear catch and a hook for engaging a disconnector and adapted to be mounted in a fire control mechanism pocket of a receiver	The Kabuto (green, blue, and purple) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear catch and a hook for engaging a disconnector (orange). (Plaintiff-generated renderings of Kabuto here and below)

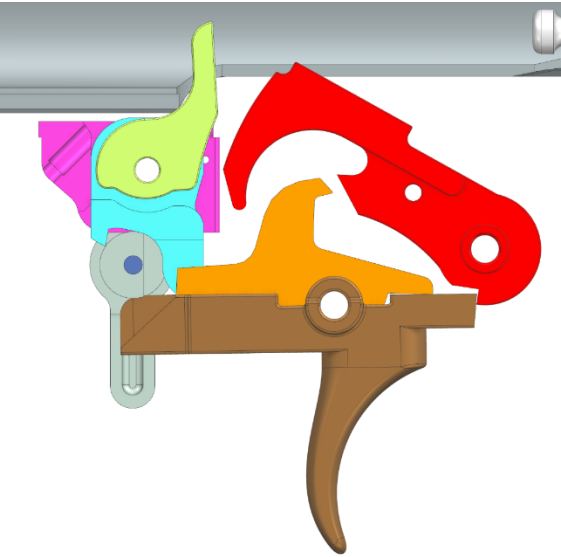
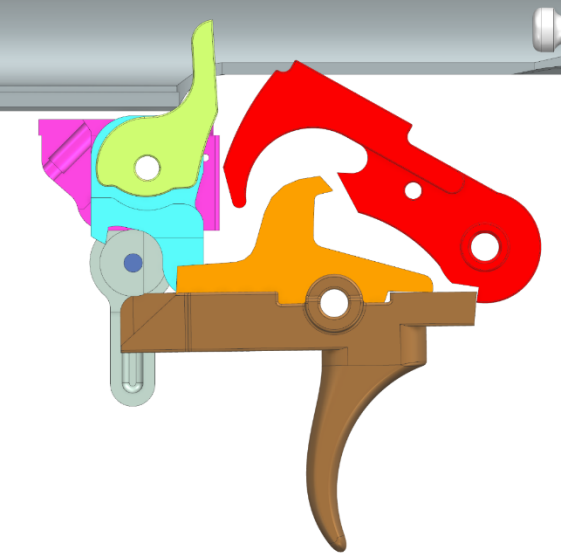
'247 Patent, Claim 15	The Kabuto
to pivot on a transverse hammer pivot axis between set and released positions, said hammer adapted to be pivoted rearward by rearward movement of a bolt carrier,	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below.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

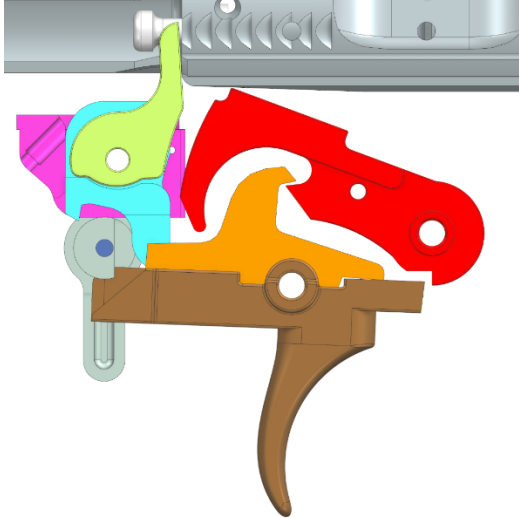
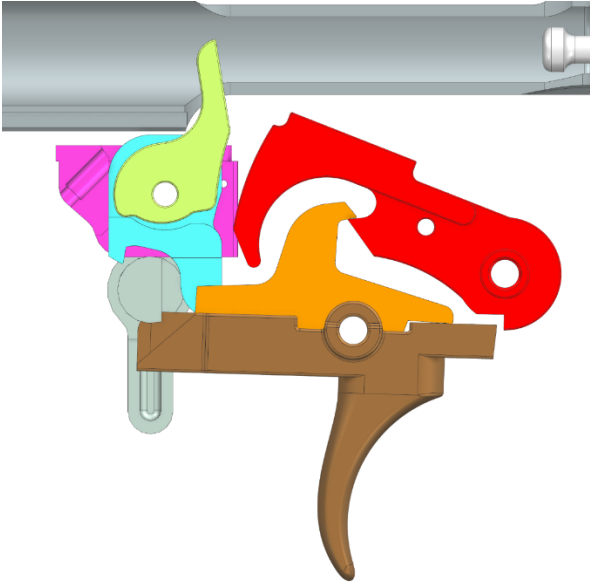
'247 Patent, Claim 15	The Kabuto
a trigger member having a sear and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and released positions,	The Kabuto (green, blue, and purple) is installed with a trigger member (brown) in the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

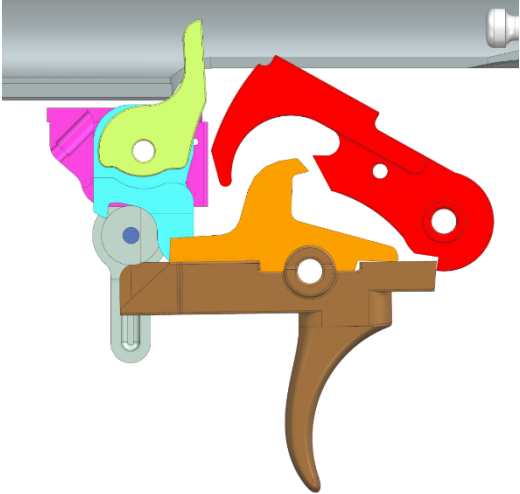
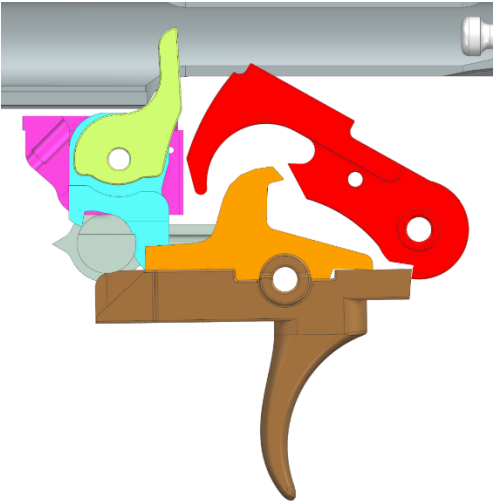
'247 Patent, Claim 15	The Kabuto
and are out of engagement in said released positions of said hammer and trigger member,	The sear of the trigger member (brown) and sear catch of the hammer (red) are out of engagement in the released position.  The diagram shows a cross-sectional view of a firearm's trigger mechanism. A brown trigger member is in a released position, with its sear disengaged from the hammer. The hammer is red and is in a cocked position. Other components are shown in various colors: a green sear, a blue trigger guard, a pink trigger housing, and a grey trigger spring. The trigger member has a curved, hook-like shape at its base. Trigger Member Released Position
said disconnecter having a hook for engaging said hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis,	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).  The diagram shows a cross-sectional view of the same trigger mechanism, but with an orange disconnecter engaged. The disconnecter is mounted on a transverse pivot axis and has a hook that is engaged with the hammer. The hammer is red and is in a cocked position. The trigger member is brown and is in a released position. The disconnecter is shown in a position that allows it to pivot and engage the hammer. Disconnecter Hook Engaged

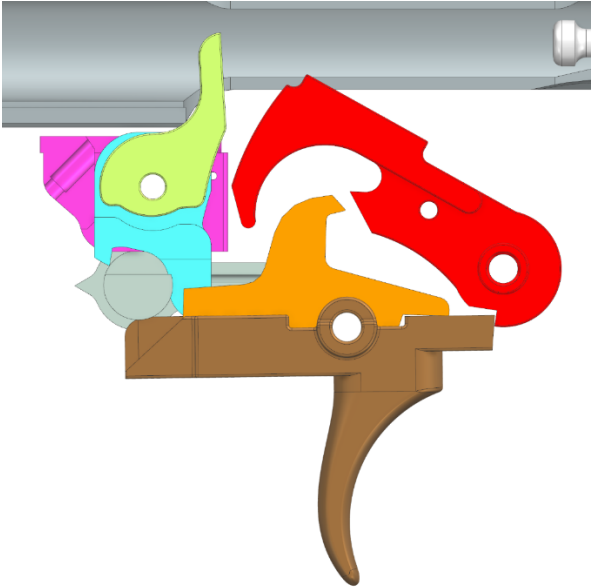
'247 Patent, Claim 15	The Kabuto
and a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,	The Kabuto has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See Image above depicting Kabuto, shown in green, blue, and purple, in fire control mechanism pocket) The diagram shows a cross-sectional view of a mechanical assembly. A green lever is pivoted to a blue cam. The cam is mounted on a purple base. A label 'Cam' points to the blue cam body, and a label 'Cam lobe' points to a specific curved feature on the cam. A label 'Lever' points to the green lever arm. The entire assembly is shown within a pocket of a larger mechanism. Kabuto Cam with Lobe and Lever

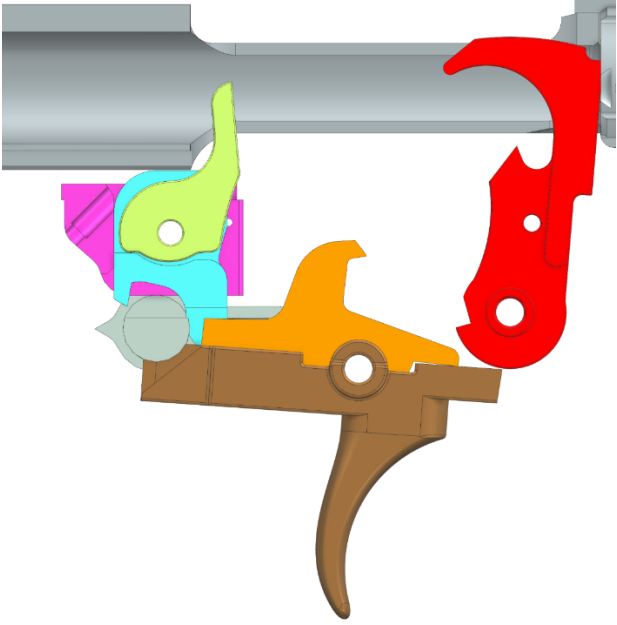
'247 Patent, Claim 15	The Kabuto
said cam being movable between a first position and a second position, in said second position said cam lobe forces said trigger member towards said set position,	The cam is movable between a first position and a second position.  Cam and Lobe First Position In the second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

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

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

'247 Patent, Claim 15	The Kabuto
at which time a user must manually release said trigger member to free said hammer from said disconnecter to permit said hammer and trigger member to pivot to said set positions so that the user can pull said trigger member to fire the firearm, and	. . . at which time a user must manually release the trigger member (brown) to free said hammer (red) from the disconnecter (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm. 
whereupon in a forced reset semi-automatic mode,	When in the “forced reset” semi-automatic mode, 

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

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

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

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

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

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

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

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

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

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

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

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

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

COUNT II — INFRINGEMENT OF THE '784 PATENT

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

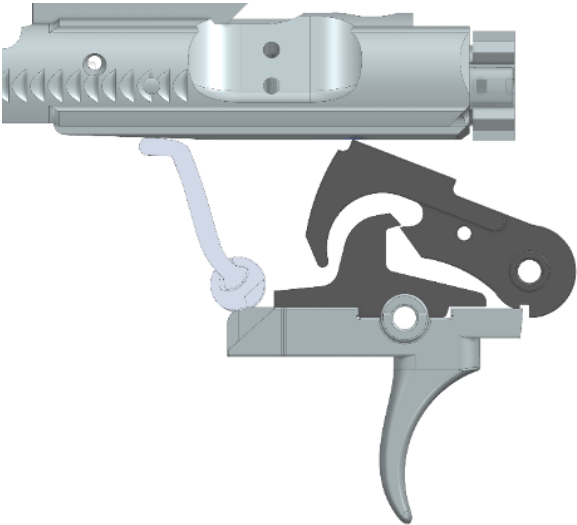
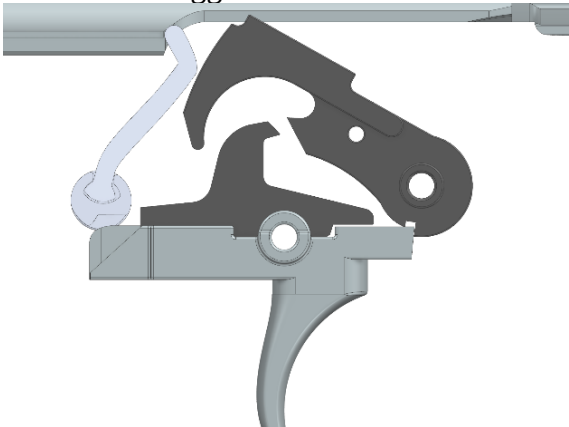
57. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using,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

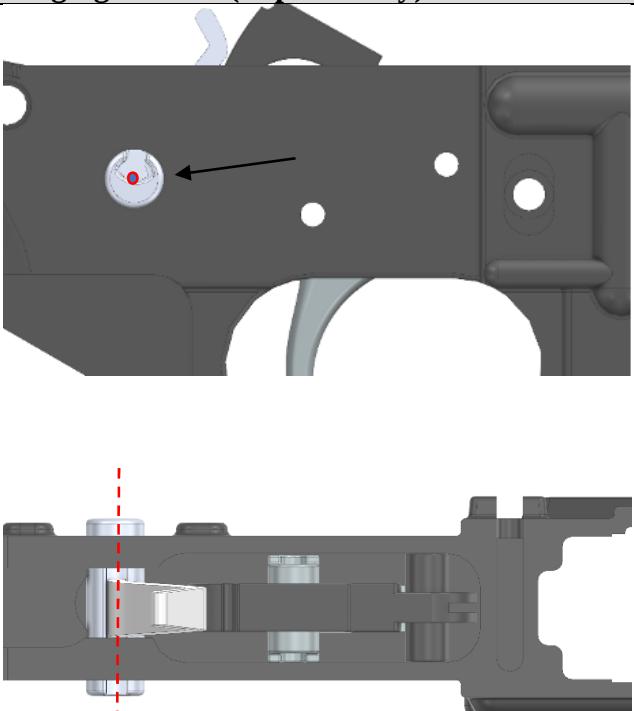
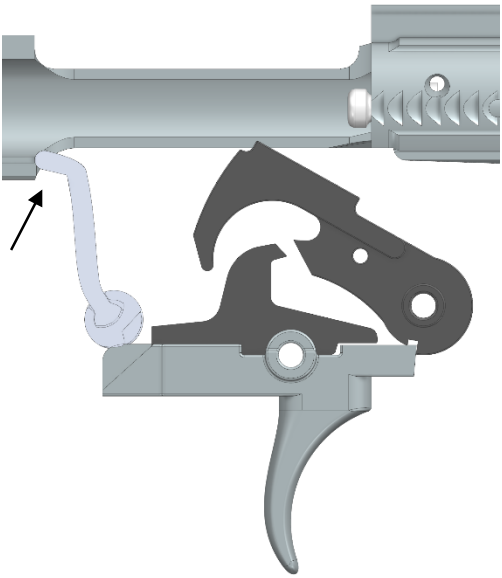
58. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '784 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

59. 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:

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

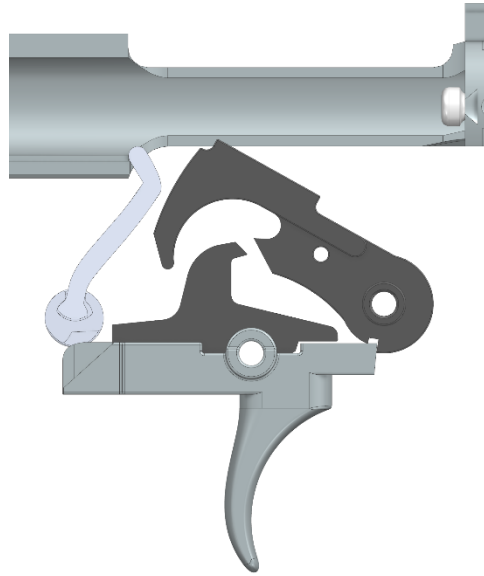
'784 Patent, Claim 1	Infringing Devices (Super Safety)
	Super Safety Ex. F, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12. Super Safety Installed (Plaintiff-generated renderings of Super Safety here and below; Locking member and bolt carrier shown here and below in section view for clarity) “The Super Safety is a mechanism that actively resets the trigger of a firearm to allow the operator to fire again, quickly, and efficiently. The Super Safety has been designed to operate with AR-15 pattern firearms that use a mil-spec bolt carrier and fire control group.” Ex. F, Super Safety Guide at 1.

'784 Patent, Claim 1	Infringing Devices (Super Safety)
a locking member that is movable between a first position in which it locks a trigger against pulling movement	The Super Safety operates as a locking member and has a first position in which the Super Safety locks the trigger member against pulling movement.  Locked First Position
and a second position where it does not restrict movement of the trigger member,	The Super Safety is moveable from the first position to a second position where it does not restrict movement of the trigger member.  Unlocked Second Position
the locking member configured to be movably supported by a frame	The Super Safety is movably (pivotally about the axis depicted below) supported by a frame (the lower receiver).

'784 Patent, Claim 1	Infringing Devices (Super Safety)
	
and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,	The Super Safety has an upward extending portion (lever arm) configured to make actuating contact with a surface of the bolt carrier. 

such actuating contact causing the locking member to move from the first position to the second position,

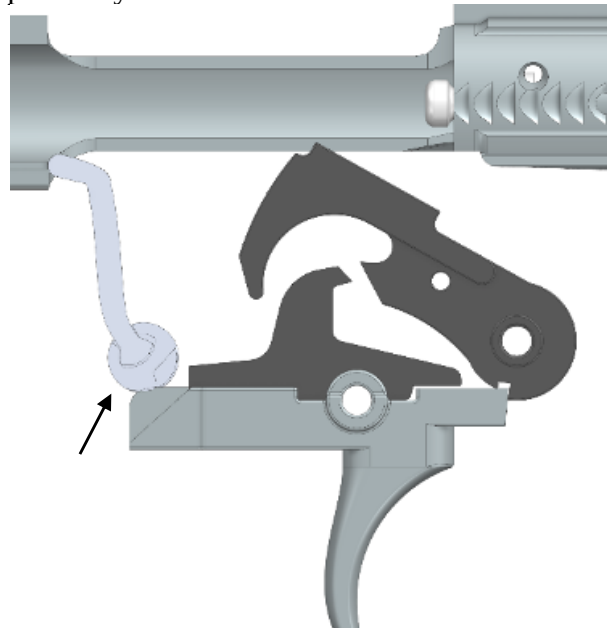
The actuating contact causes the locking member to move from the first position to the second position.



Unlocked Second Position

the locking member having a body portion that is movably supported

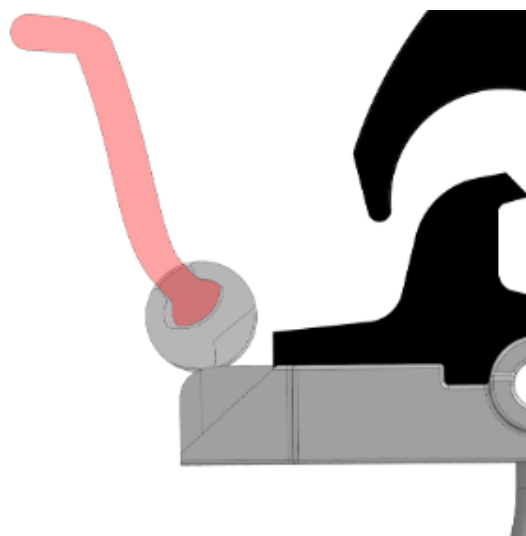
The Super Safety has a body portion that is movably supported by the lower receiver.



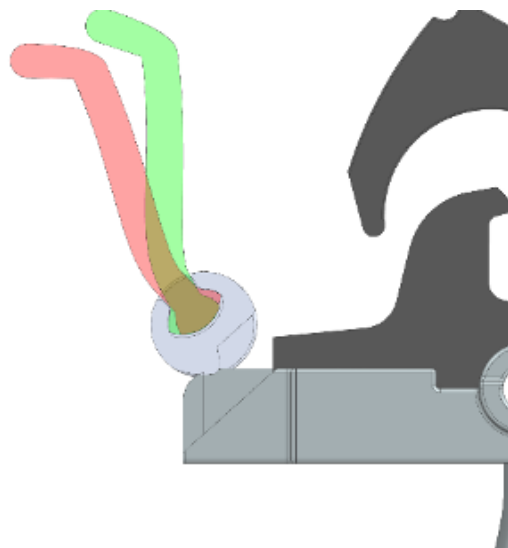
and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position

The Super Safety has an upwardly extending deflectable portion (lever arm). The dovetail connection is designed to allow separate movement of the lever arm relative to the body portion between one

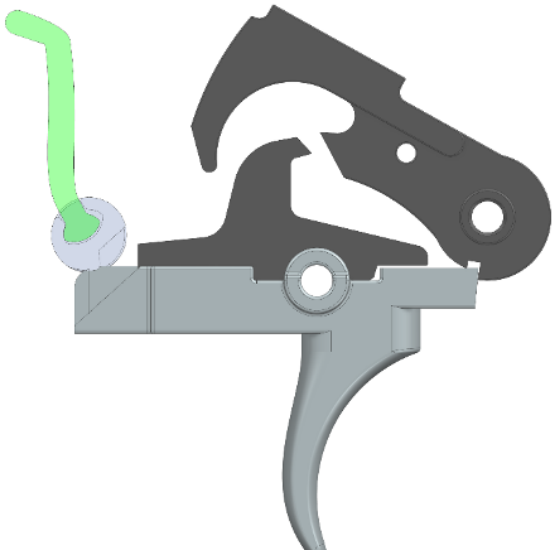
position (depicted in red) where it is extended and another position where it is deflected (depicted in green).



Below illustrates the upward extending deflectable portion's (lever arm) total separate travel with an overlay of the lever in both positions without the body portion moving.

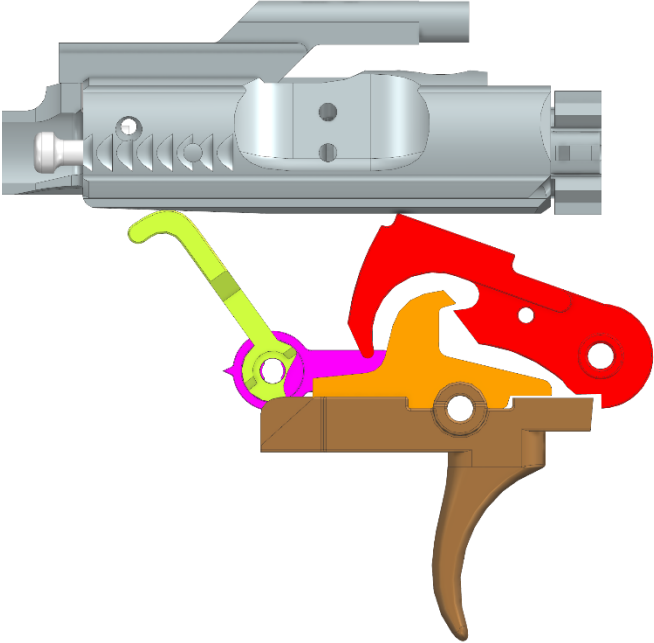
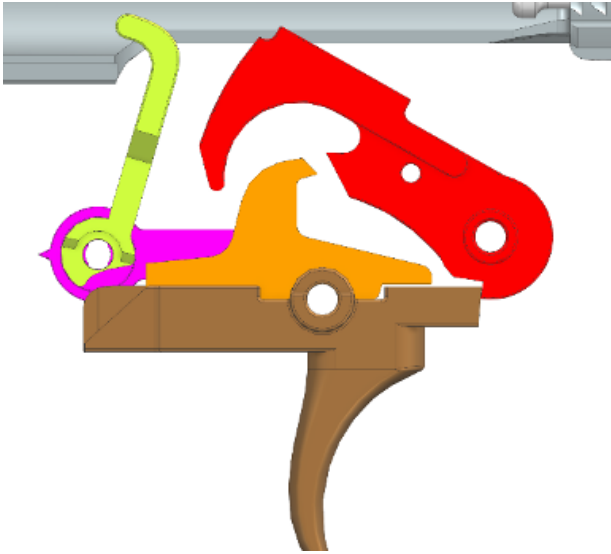


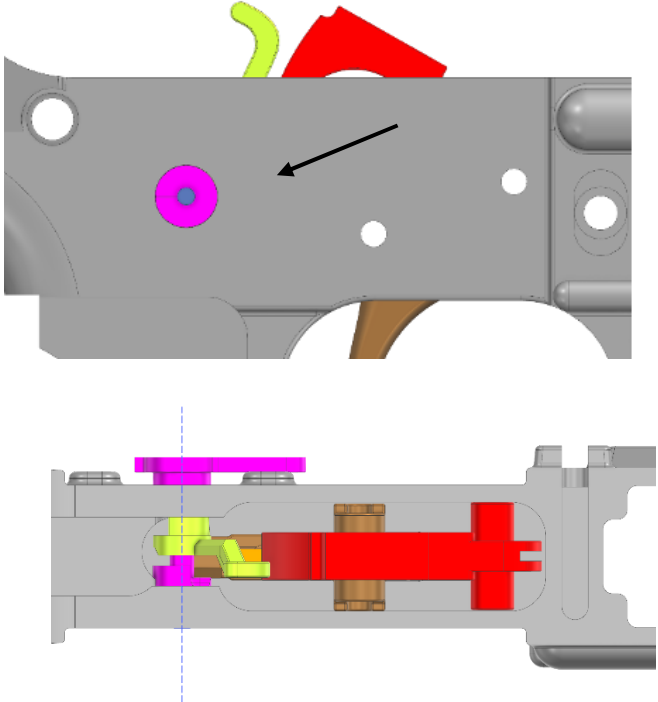
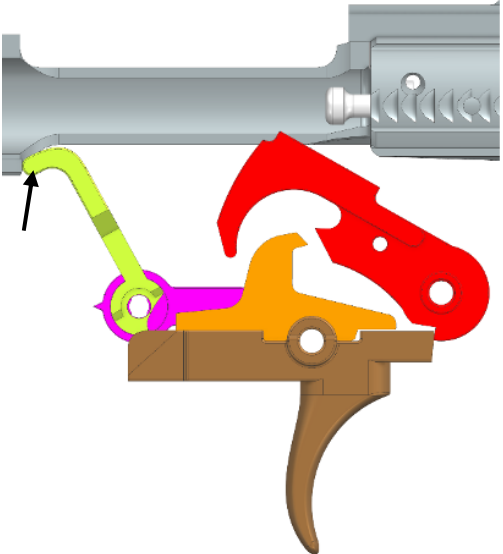
“The dovetail joint does not immediately transfer torque from the lever to the cam. The lever pivots in the cam until the void is filled. Once the void is filled the hammer can transfer torque to the cam via the upper and lower contact surfaces and. Note that the void, the lower contact surface, and the upper contact surface, are shown on arbitrary sides of the dovetail,

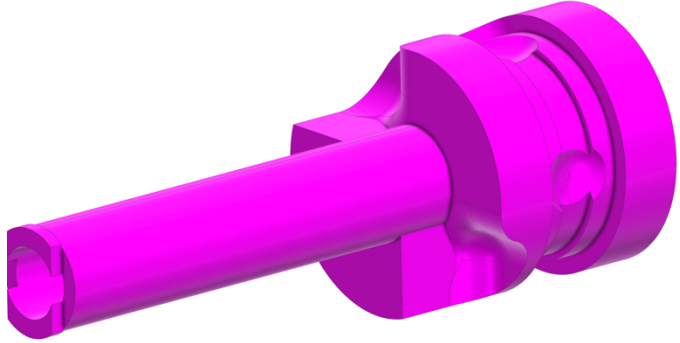
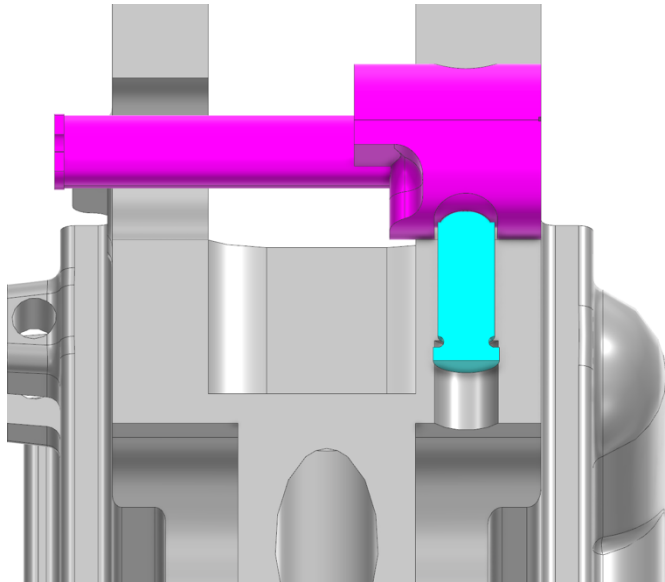
	these features may be on either side of the dovetail depending on which direction the lever is moving. The amount that the lever rotates in the dovetail before transferring torque to the cam is such that as the bolt carrier completes its forward movement, the cam rotates the neutral surface away from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

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

'784 Patent, Claim 1	The Atrius Selector
1. In a forced reset trigger mechanism, an extended trigger member locking device, comprising:	When installed and used as directed, the Atrius Selector is part of a trigger mechanism and functions as an extended trigger member locking device. Atrius Selector Atrius Selector Installed (Plaintiff-generated renderings of Atrius Selector here and below; Locking member and bolt carrier shown here and below in section view for clarity)
a locking member that is movable between a first position in which it locks a trigger against pulling movement	The Atrius Selector operates as a locking member and has a first position in which it locks the trigger member against pulling movement.

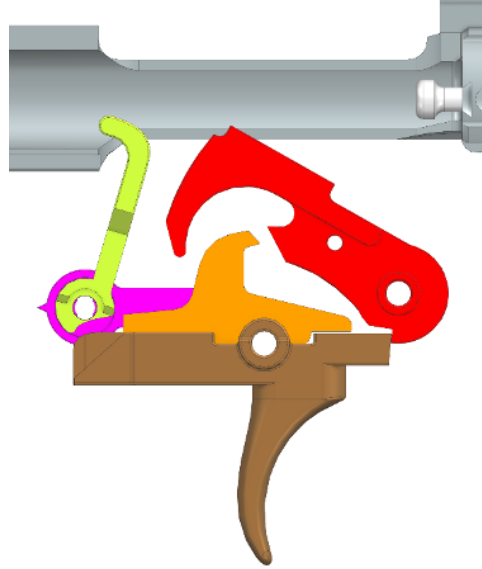
'784 Patent, Claim 1	The Atrius Selector
	 Locked First Position
and a second position where it does not restrict movement of the trigger member,	The Atrius Selector is moveable from the first position to a second position where it does not restrict movement of the trigger member.  Unlocked Second Position
the locking member configured to be movably supported by a frame	The Atrius Selector is movably (pivotaly about the axis depicted below) supported by a frame (the lower receiver).

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

'784 Patent, Claim 1	The Atrius Selector
	 The body portion (purple) has a track with holes that are lined up to correspond to the selectable modes (Fire/ Standard Semi-Automatic, "Forced Reset" Semi-Automatic) which are positively stopped by a detent (blue).  Section View of Body Portion (purple), Lower Receiver (grey), and Detent (blue) Once installed, the body portion (purple) is movably supported by the lower receiver (grey) using the detent (blue).

such actuating contact causing the locking member to move from the first position to the second position,

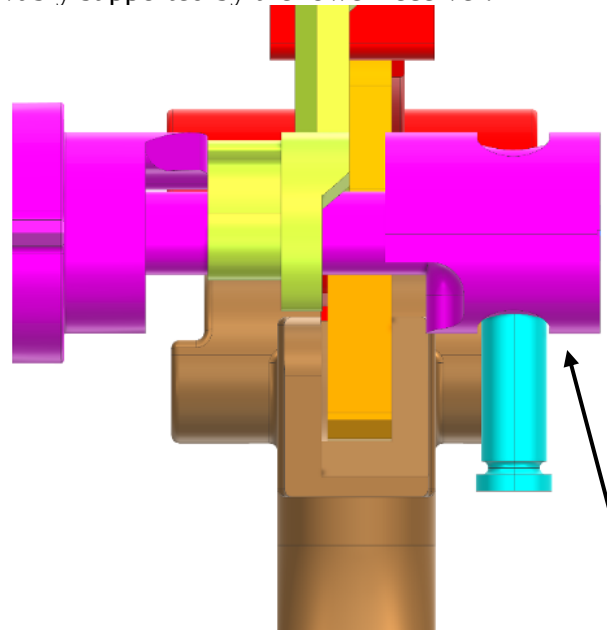
The actuation causes the locking member to move from the first position to the second position.



Unlocked Second Position

the locking member having a body portion that is movably supported

The Atrius Selector has a body portion (purple) that is movably supported by the lower receiver.



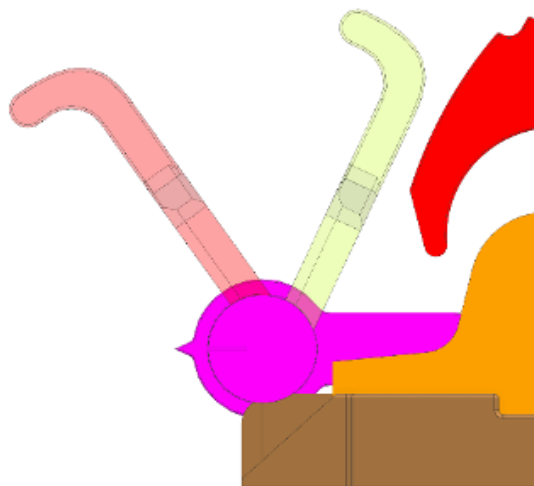
and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position

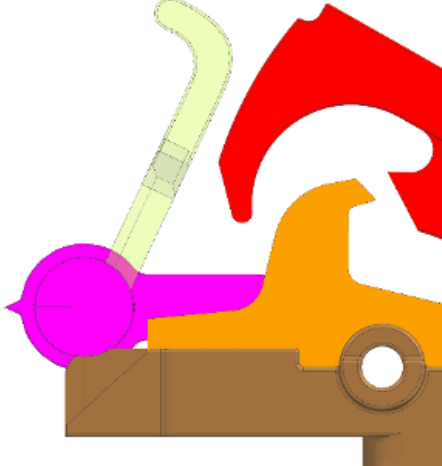
The Atrius Selector has an upwardly extending deflectable portion (lever arm). The connection is designed to allow separate movement of the lever arm relative to the body portion between one position

(depicted in red) where it is extended and another position where it is deflected (depicted in yellow).



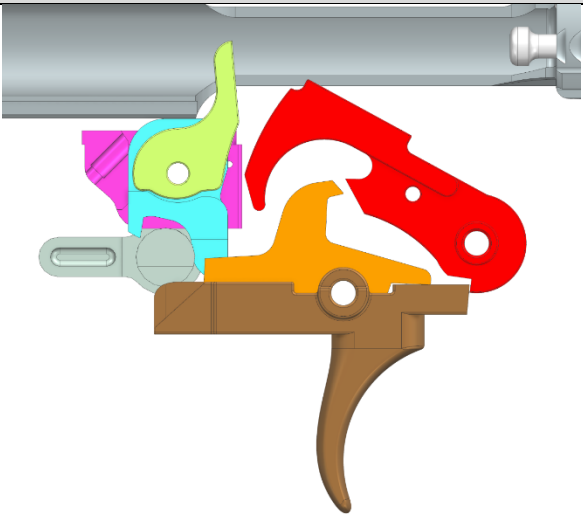
Below illustrates the upward extending deflectable portion's (lever arm) total separate travel with an overlay of the lever in both positions without the body portion moving.



and a deflected position.	The lever is now shown deflected independent of the body. 
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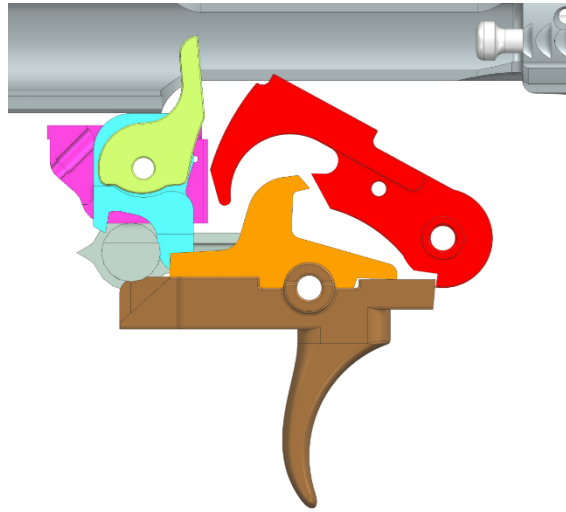
61. An exemplary comparison of the Kabuto, when assembled and used as intended, with claim 1 of the '784 Patent is illustrated in the chart below:

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

'784 Patent, Claim 1	The Kabuto
	 Kabuto Installed (Plaintiff-generated renderings of Kabuto here and below)
a locking member that is movable between a first position in which it locks a trigger against pulling movement	The Kabuto (yellow, blue, and purple) operates as a locking member and has a first position in which the Kabuto locks the trigger member against pulling movement.  Locked First Position

and a second position where it does not restrict movement of the trigger member,

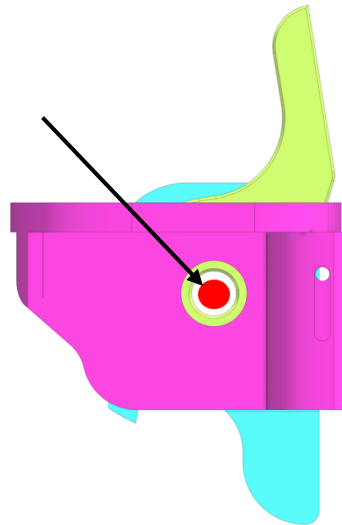
The Kabuto (yellow, blue, and purple) is moveable from the first position to a second position where it does not restrict movement of the trigger member.

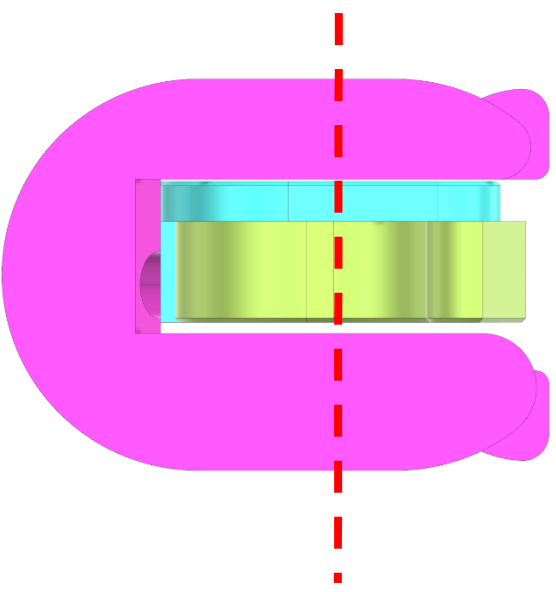
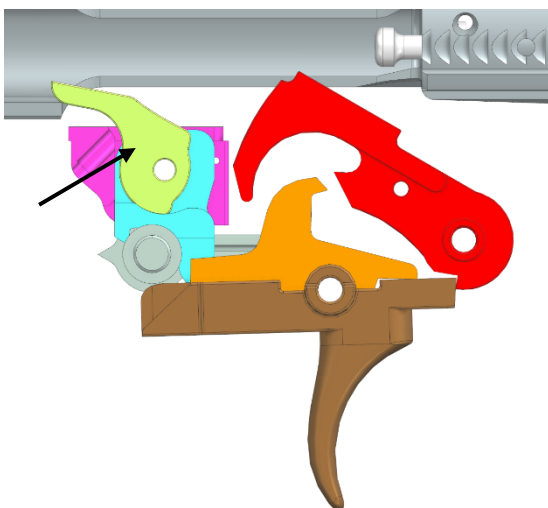


Unlocked Second Position

the locking member is configured to be movably supported by a frame

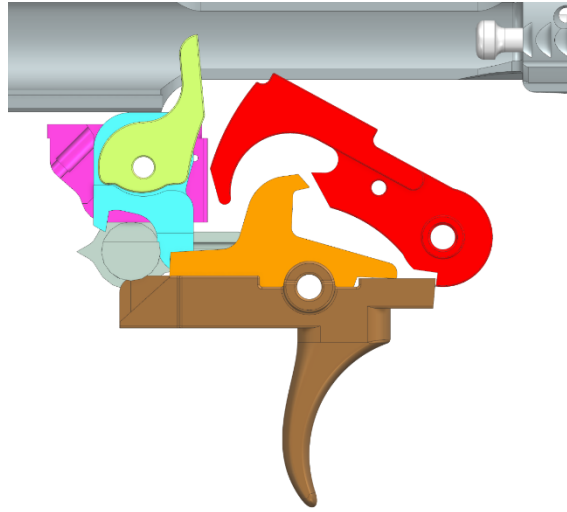
The Kabuto (yellow, blue, and purple) is movably (pivotally about the axis depicted below) supported by a frame (purple).



	
and including a generally upward extension portion configured to make actuating contact with a surface of the bolt carrier,	The Kabuto (yellow, blue, and purple) has an upward extending portion (the “lever arm,” yellow) configured to make actuating contact with a surface of the bolt carrier. 

such actuating contact causing the locking member to move from the first position to the second position,

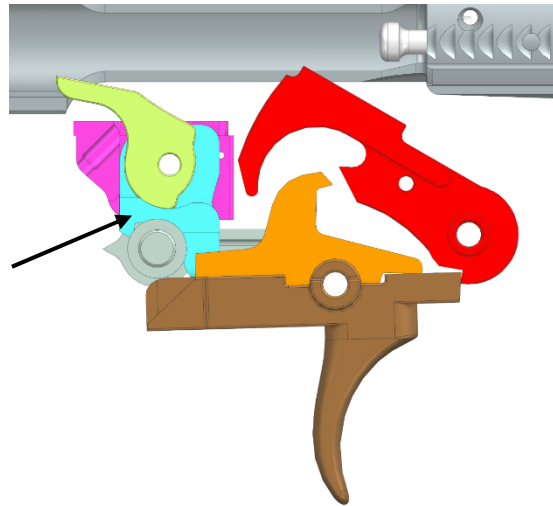
The actuating contact causes the locking member to move from the first position to the second position.



Unlocked Second Position

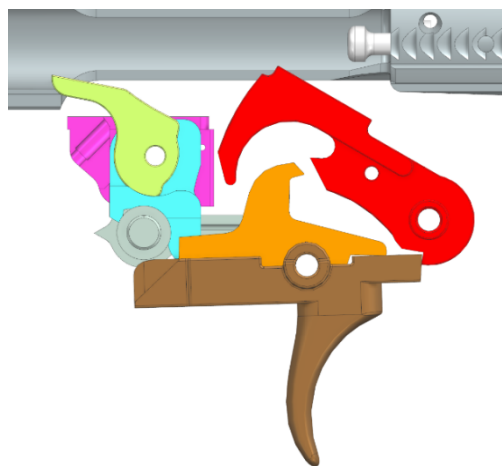
the locking member having a body portion that is movably supported

The Kabuto (yellow, blue, and purple) has a body portion (blue) that is movably supported by a housing (purple).

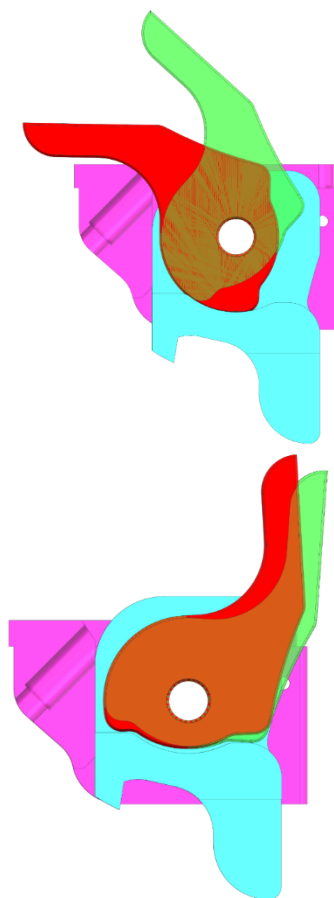


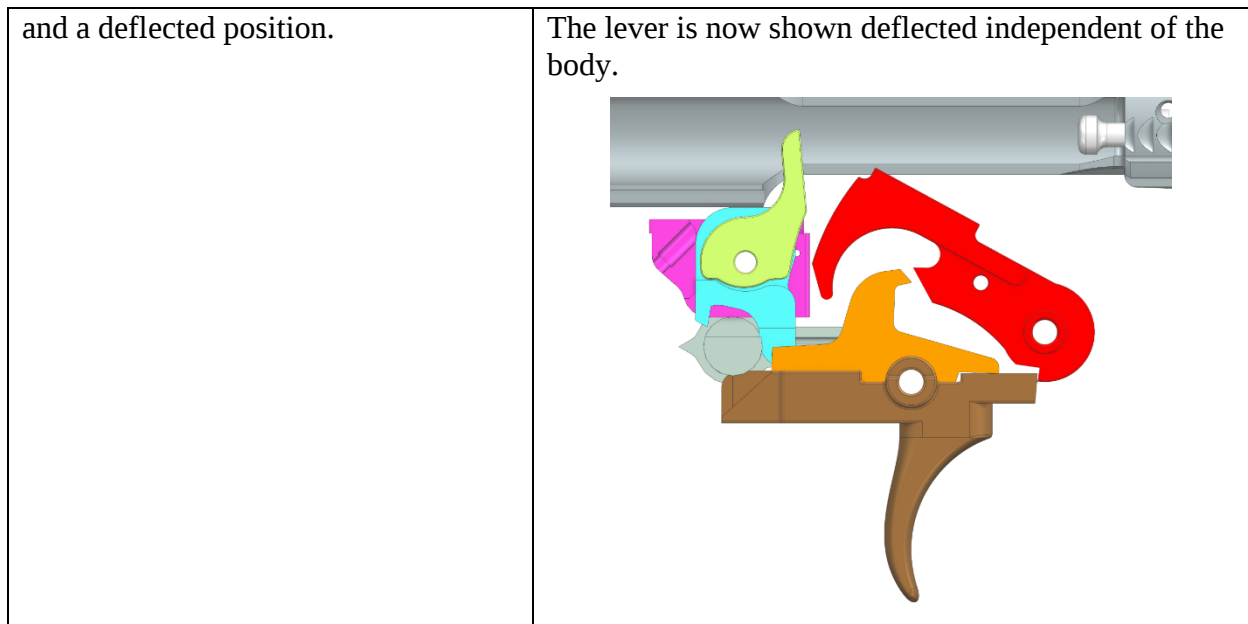
and an upwardly extending deflectable portion that is separately movable relative to the body portion between an extended position

The Kabuto (yellow, blue, and purple) has an upwardly extending deflectable portion (lever arm).



The below illustrates the lever arm's (upward extending deflectable portion) total separate travel with an overlay of the lever in both positions without the body portion moving.





62. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '784 patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, installation of, encouraging, advertising, promoting, and instructing others to use and/or how to use the Super Safety, Atrius, and Kabuto while selling products.

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

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

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

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

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

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

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

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

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

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

COUNT III — INFRINGEMENT OF THE '538 PATENT

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

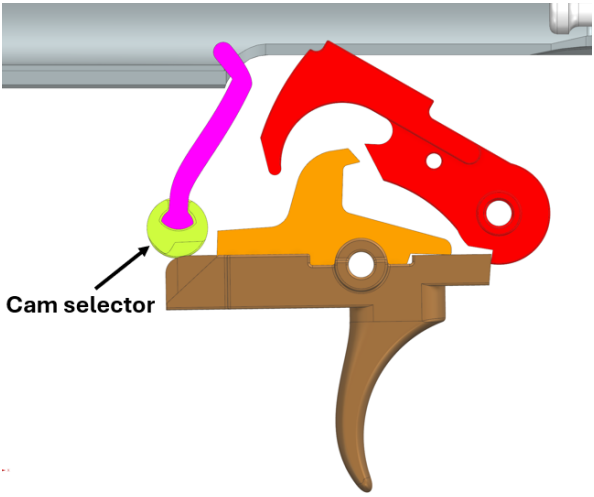
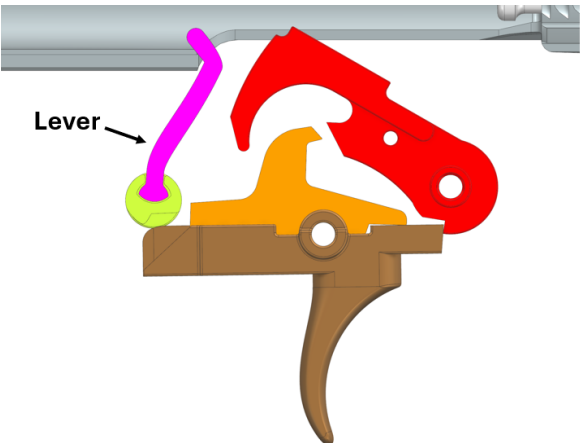
73. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '538 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using,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

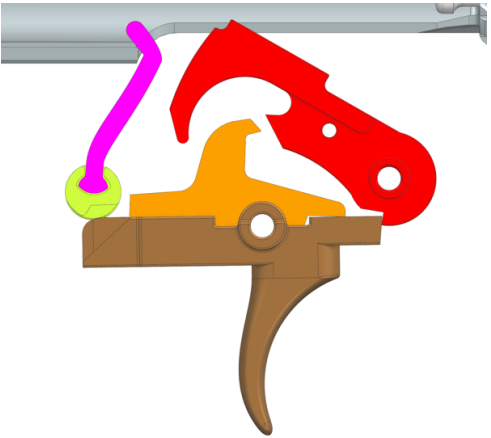
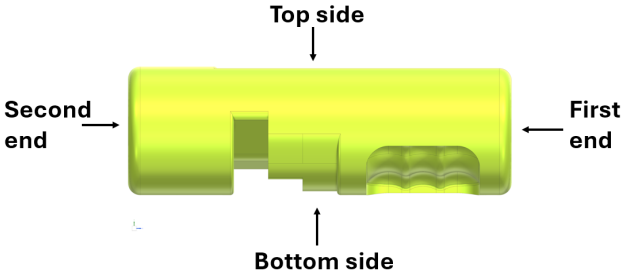
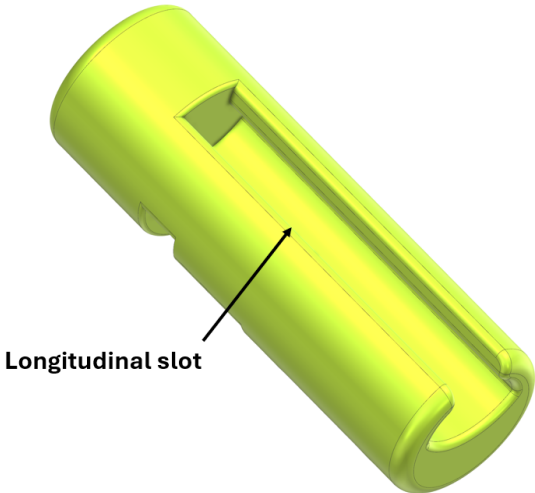
74. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '538 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

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

'538 Patent, Claim 1	The Super Safety
1. A safety mechanism for a firearm comprising:	The Super Safety is part of a trigger mechanism installed into a firearm receiver in place of a standard safety.

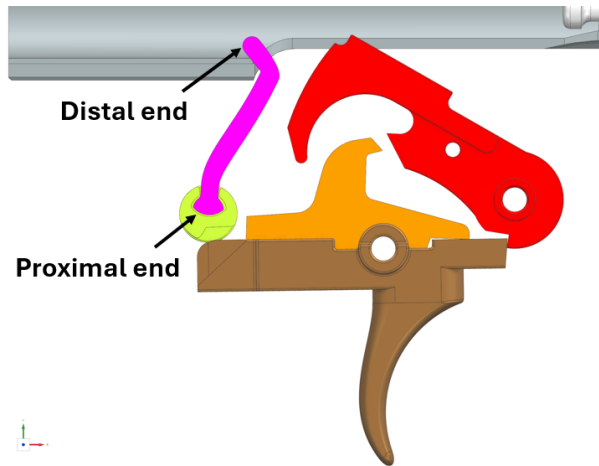
'538 Patent, Claim 1	The Super Safety
	Super Safety Ex. F, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12. Super Safety Installed (Plaintiff-generated renderings of Super Safety here and below; cam selector and bolt carrier shown in section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

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

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

the lever comprising a proximal end and a distal end;

The Super Safety lever (pink) has a proximal end and a distal end, as illustrated below.

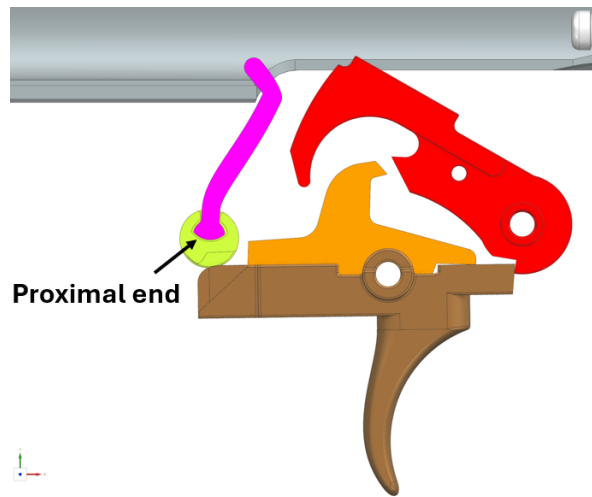


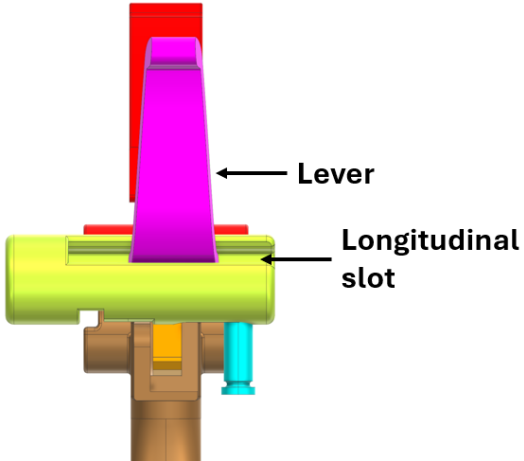
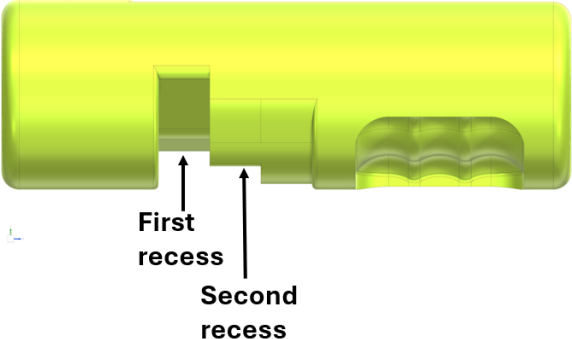
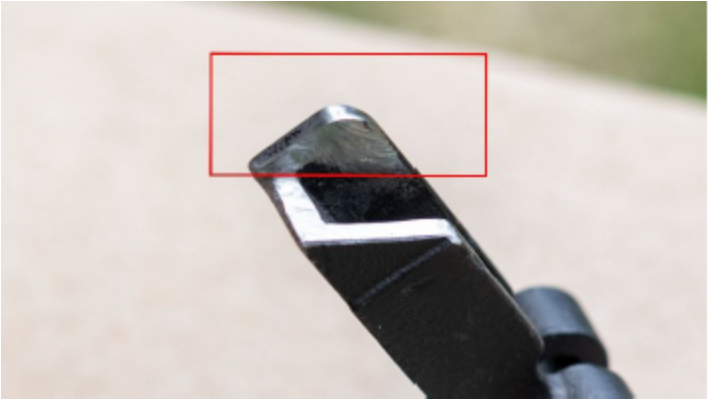
the longitudinal slot being configured to receive the proximal end of the lever;

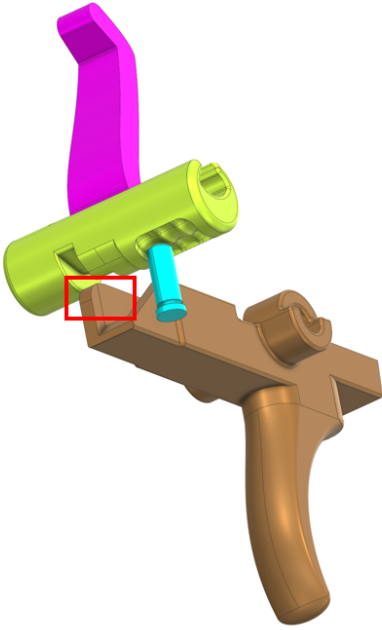
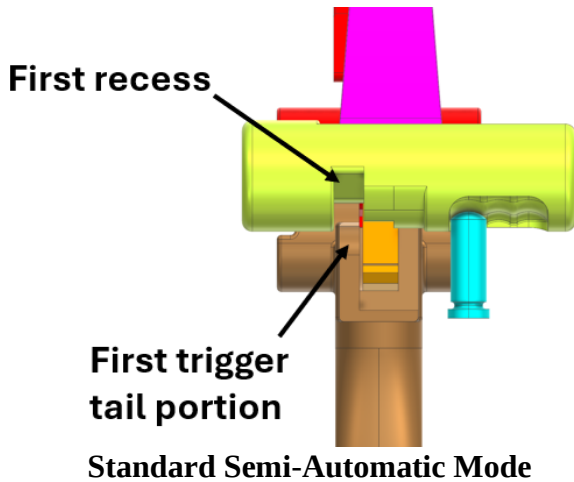
The longitudinal slot on the top side of the cam selector (yellow) is configured to receive the proximal end of the lever (pink).



Ex. F, Super Safety Guide at 12

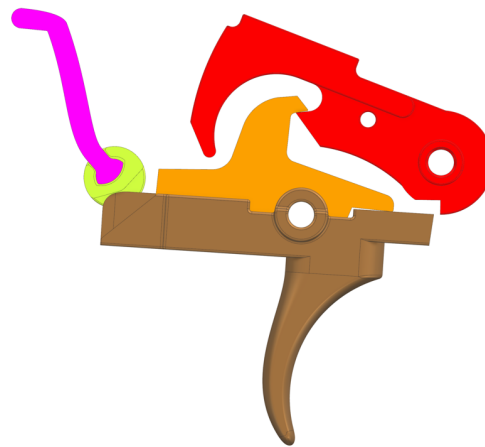


	 Super Safety Installed
the cam selector further comprising a first recess and a second recess on the bottom side of the cam selector;	The Super Safety dual mode cam selector has a first recess and a second recess on the bottom side of the cam. 
the trigger comprising a first trigger tail portion;	The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

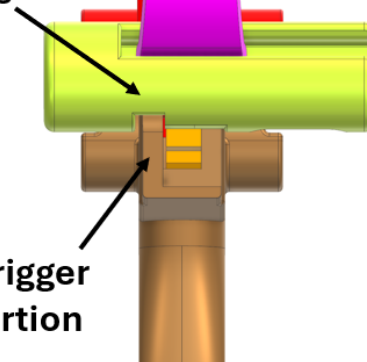
	
the cam selector being configured to operate between a first mode, a second mode, and a third mode;	The Super Safety dual mode cam is operable in three modes: (1) passive reset (standard semi-automatic) (2) active reset, and (3) safe. Ex. F, Super Safety Guide at 1.
wherein the first mode of the cam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



Super Safety Installed



First recess

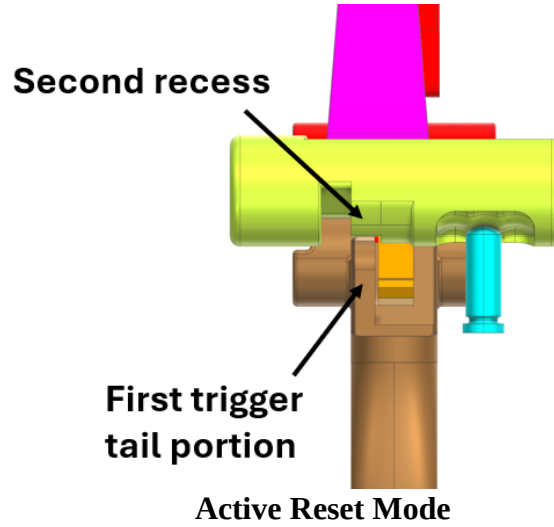


**First trigger
tail portion**

**Super Safety Installed, Trigger Pulled, Lever and Cam
Rotated**

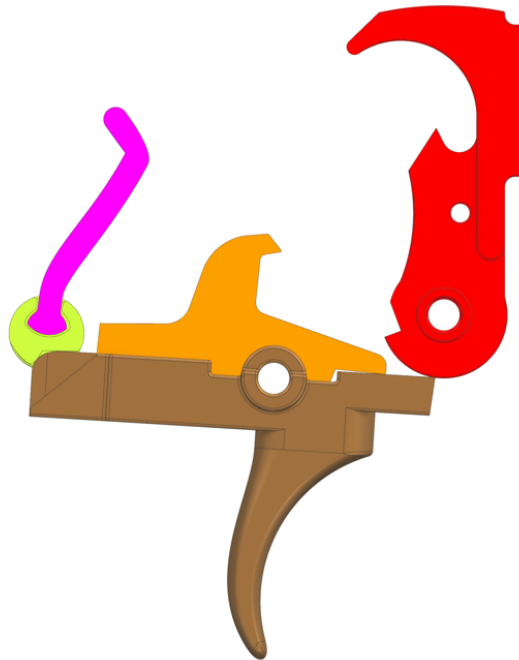
wherein the second mode of the cam selector is configured to allow the first trigger tail portion to engage the second recess

The Super Safety dual mode cam selector is operable in active reset mode, in which the first trigger tail aligns with the second recess of the cam.



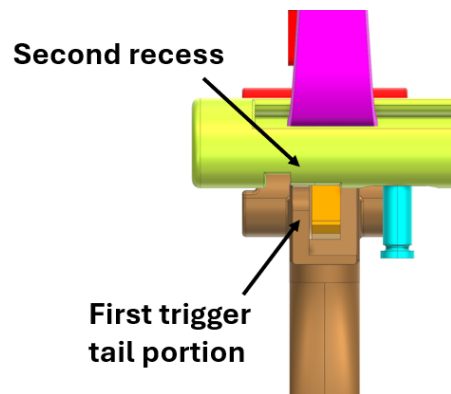
and be moved down by a cam portion of the second recess when the cam selector rotates,

In the second mode, when the cam is rotated by the lever, the cam selector portion of the second recess moves the first trigger tail portion down.



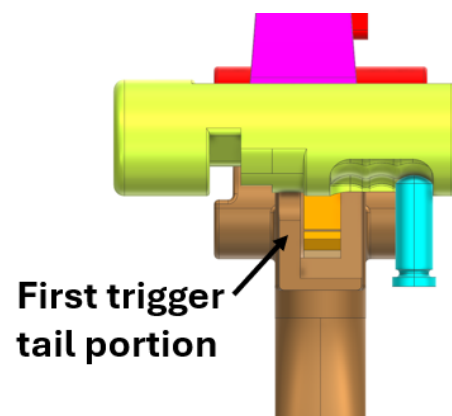


Super Safety Installed, Lever and Cam Rotated

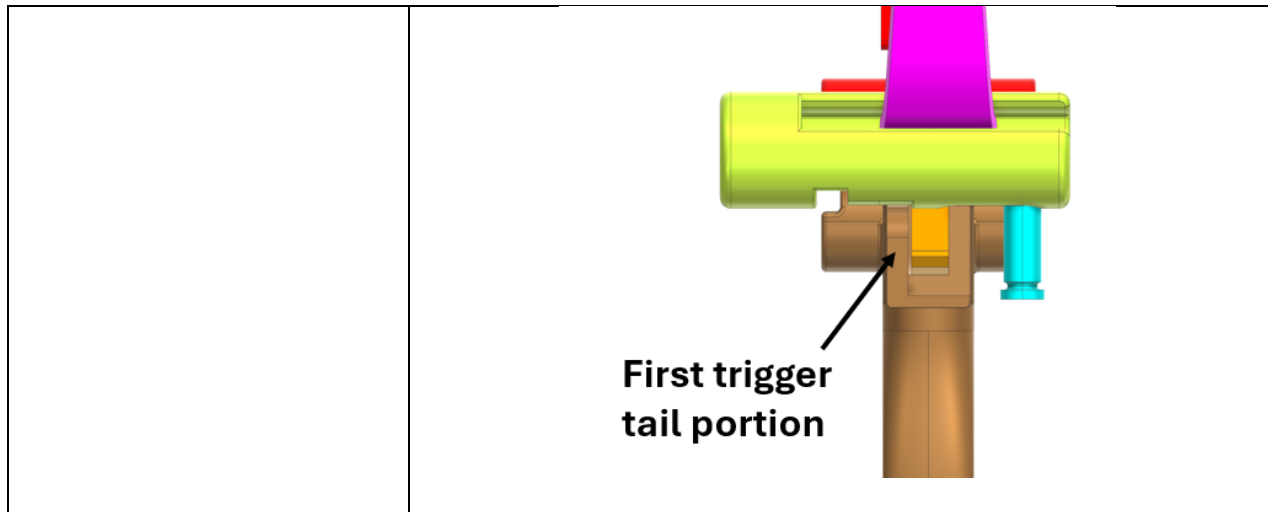


and wherein the third mode of the cam selector is configured to prevent the trigger from being pulled.

The Super Safety dual mode cam is operable in safe mode, in which the first trigger tail portion does not align with a recess in the cam. The trigger is not movable within a recess of the cam, and the cam therefore prevents the trigger from being pulled.



First trigger tail portion



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

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

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

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

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

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

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

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

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

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

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

COUNT IV — INFRINGEMENT OF THE '159 PATENT

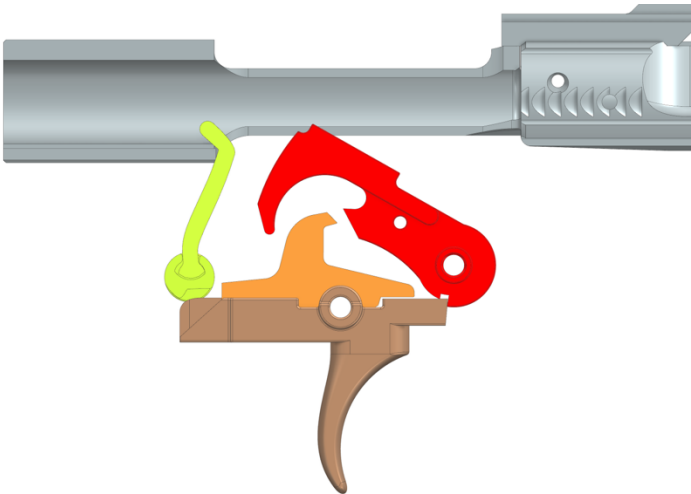
86. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

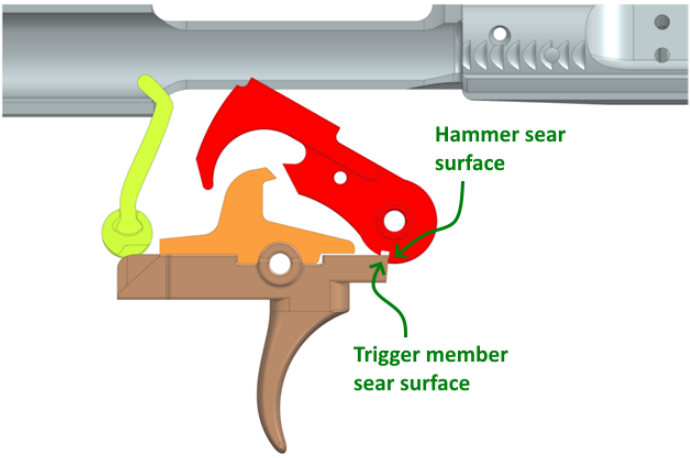
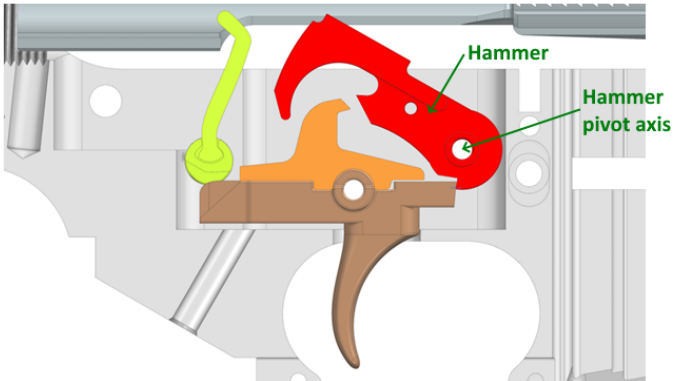
87. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents, by among other things, making, using,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

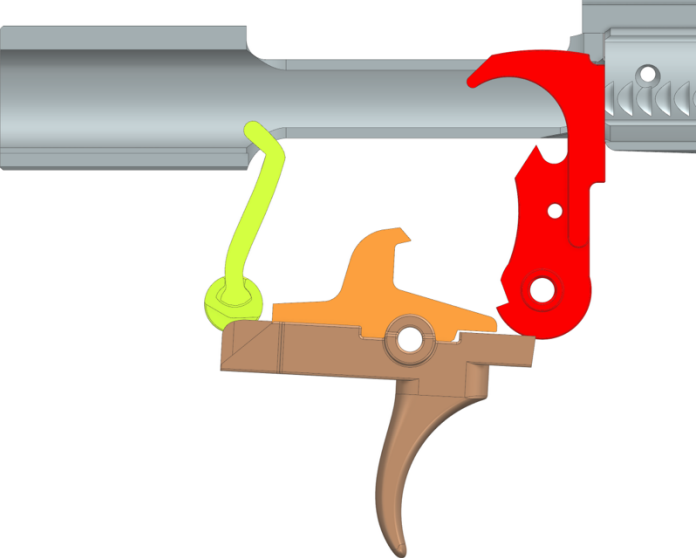
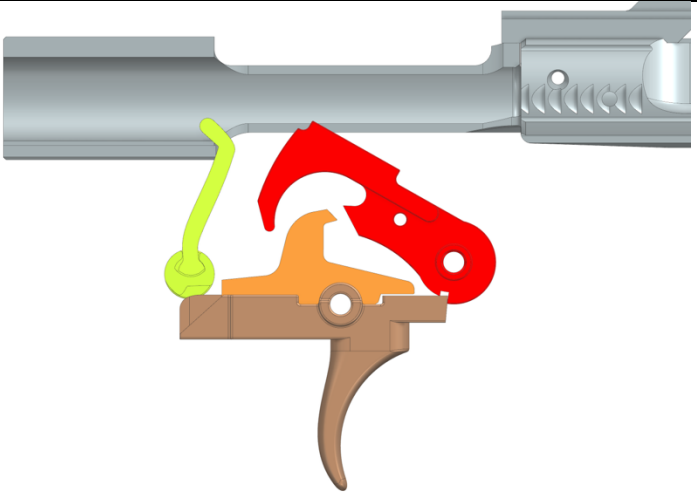
88. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '159 patent, including but not limited to claim 1, literally and/or under the doctrine of equivalents.

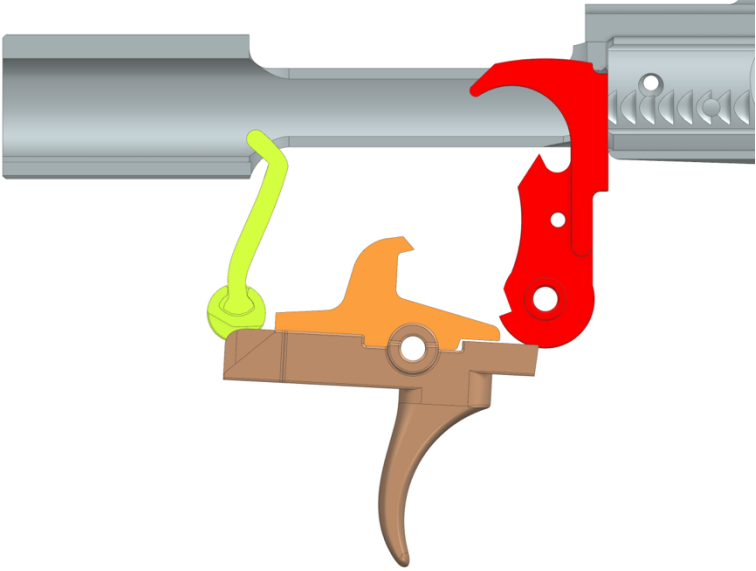
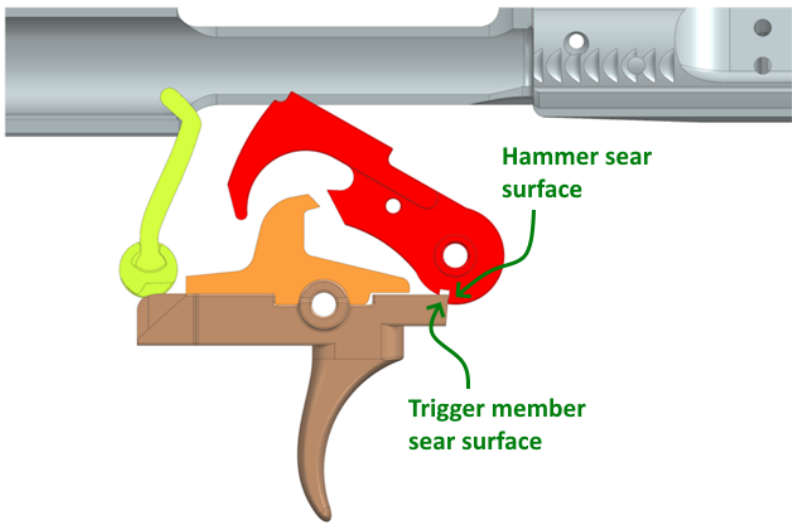
89. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

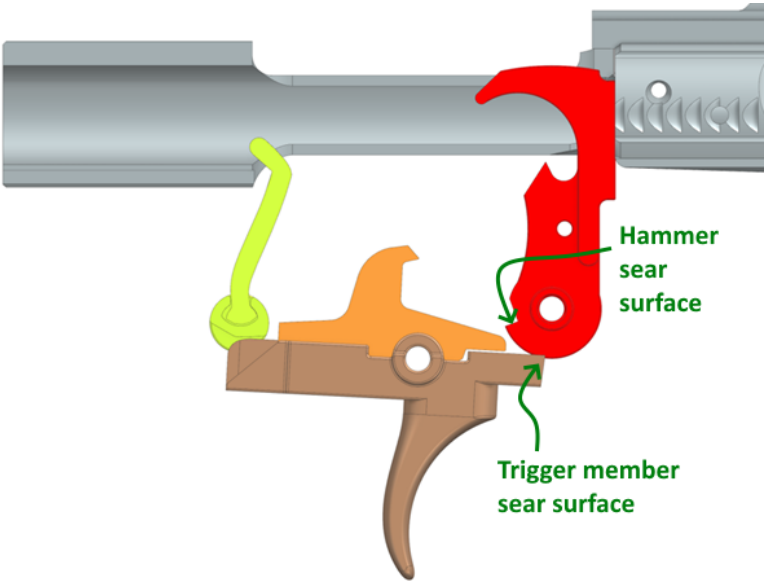
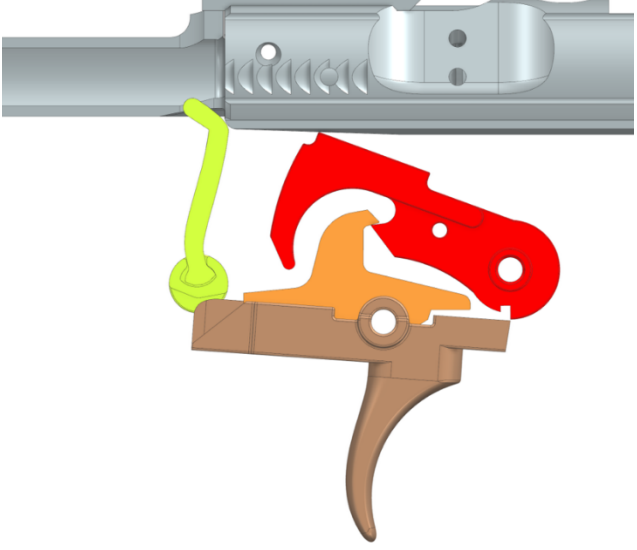
'159 Patent, Claim 1	The Super Safety
1. A firearm trigger mechanism for a firearm having a fire control mechanism pocket and a reciprocating bolt means, the trigger mechanism operable in a first, standard semi-automatic mode and in a second, forced reset semi-automatic mode, the mechanism comprising: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

'159 Patent, Claim 1	The Super Safety
	 Super Safety Ex. F, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12.  Super Safety (Installed) (Plaintiff-generated renderings of the Super Safety here and below)
a hammer having a sear surface and a hook for engaging a disconnecter and adapted to be mounted in a fire control mechanism pocket of a receiver	The Super Safety (yellow) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear surface and a hook for engaging a disconnecter (orange).

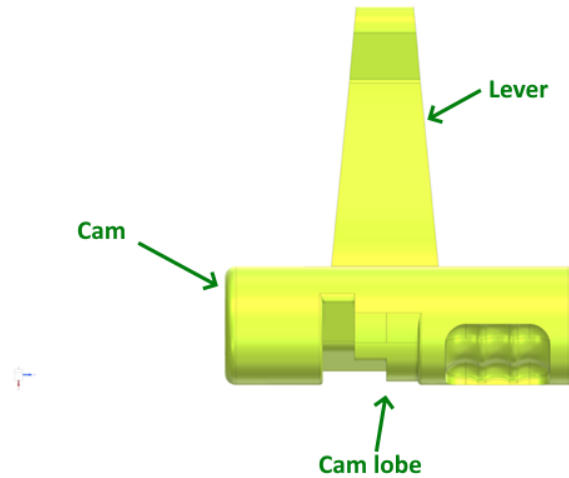
'159 Patent, Claim 1	The Super Safety
	 Hammer sear surface Trigger member sear surface Super Safety (Installed)
to pivot on a transverse hammer pivot axis between set and released positions, the hammer adapted to be pivoted rearward by rearward movement of a bolt means,	The hammer (red) pivots on a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

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

'159 Patent, Claim 1	The Super Safety
released positions,	 The diagram shows a cross-sectional view of a firearm's trigger assembly. A hammer (red) is positioned above a trigger member (brown). A green spring is visible on the left. The trigger member is in a released position, and the hammer is not yet engaged with it. Trigger Member Released Position
wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member	The sear surface of the trigger member (brown) and sear surface of the hammer (red) are in engagement when the hammer and trigger member are in their set positions.  The diagram shows the same trigger assembly as above, but the hammer (red) is now engaged with the trigger member (brown). The hammer's sear surface is in contact with the trigger member's sear surface. Labels with green arrows point to the 'Hammer sear surface' and the 'Trigger member sear surface'. Trigger Member and Hammer Member Set Position

and are out of engagement in the released positions of the hammer and trigger member,	The sear surface of the trigger member (brown) and sear catch surface of the hammer (red) are out of engagement in the released position.  Trigger Member and Hammer Member Released Positions
the disconnecter having a hook for engaging the hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis, and	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).  Hook Engaged Disconnecter
a cam having a cam lobe and adapted to be movably mounted in the	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)

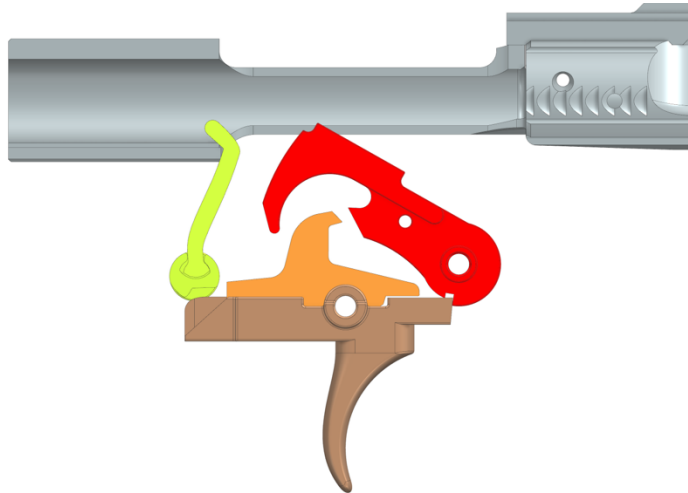
fire control mechanism pocket,



Super Safety Cam with Lobe and Lever

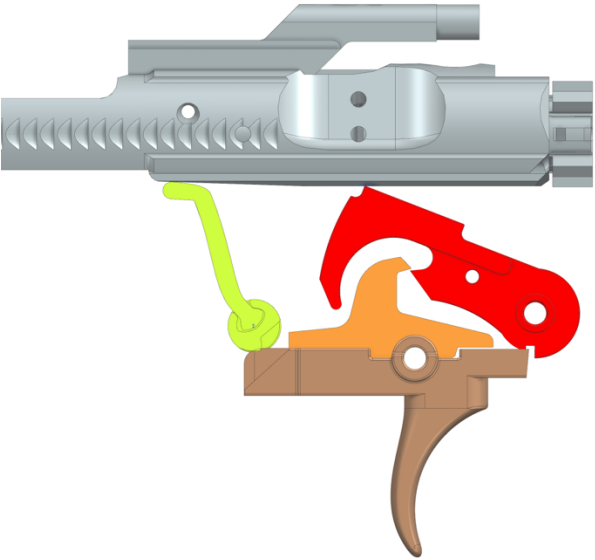
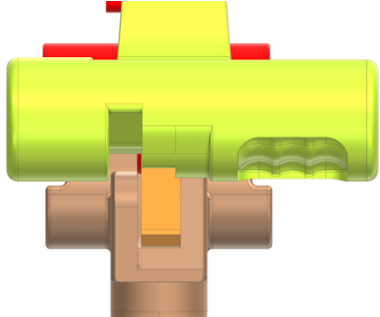
the cam being movable between a first position and a second position, in the second position the cam lobe forces the trigger member toward the set position,

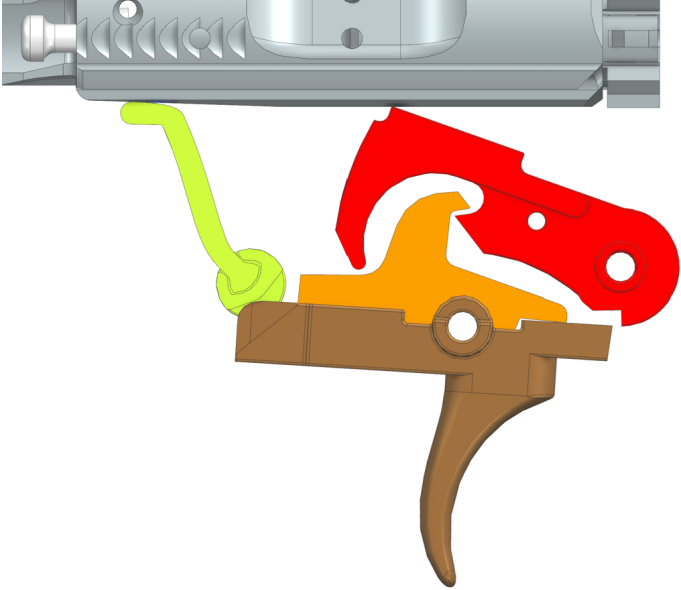
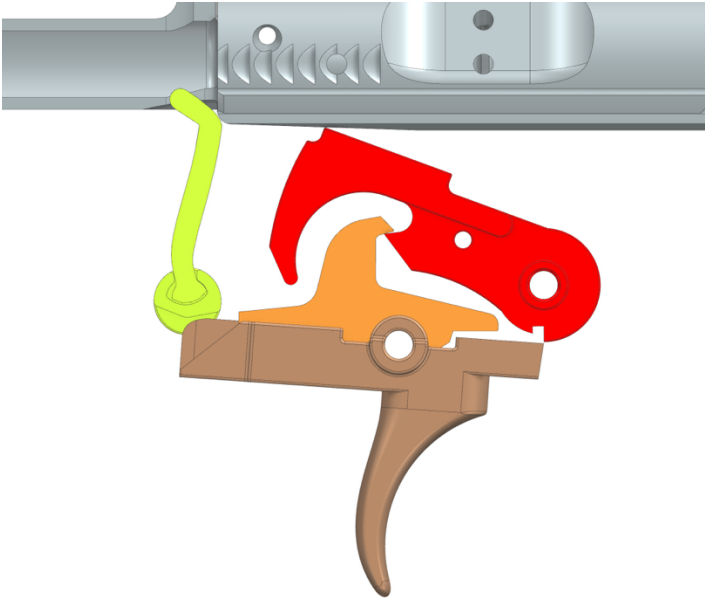
The cam is movable between a first position and a second position.

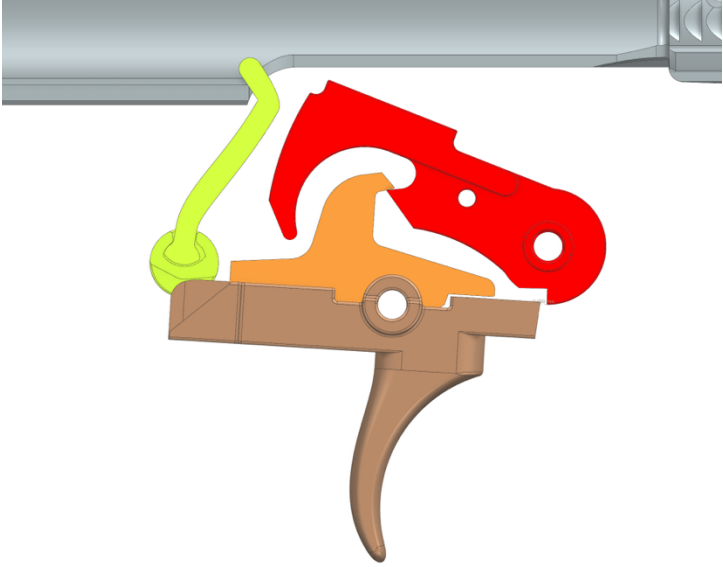
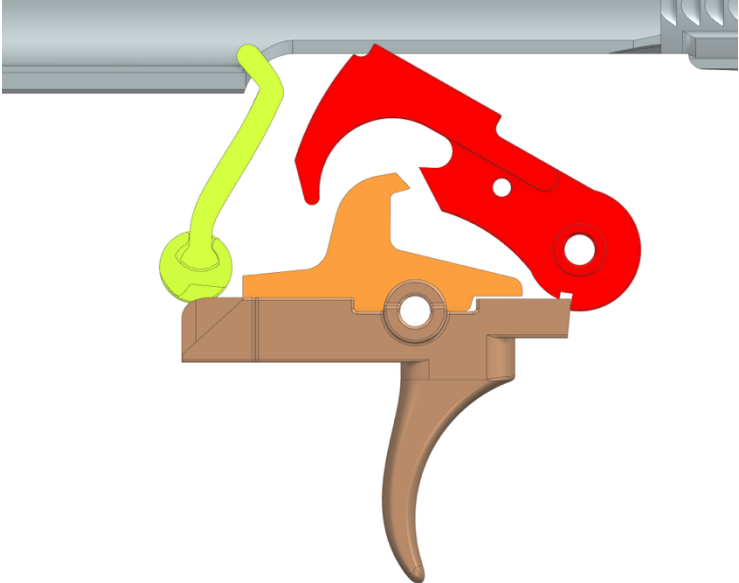


Cam and Lobe First Position

In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.

	 Cam and Lobe Second Position
whereupon in the first mode,	While in the first (standard semi-automatic) mode, 
rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook,	Rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.

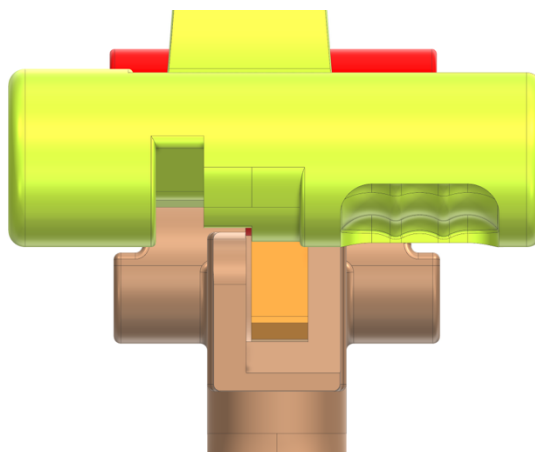
	 Disconnecter Hook Catches the Hammer
and thereafter the bolt means moves forward into battery,	Thereafter, the bolt means moves forward into battery, 

	 Pressure on Trigger Member Prevents Reset
at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnecter to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm, and	... at which time a user must manually reduce pressure on the trigger member (brown) to free the hammer (red) from the disconnecter (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm.  Reduced Pressure on Trigger Member Allows Reset

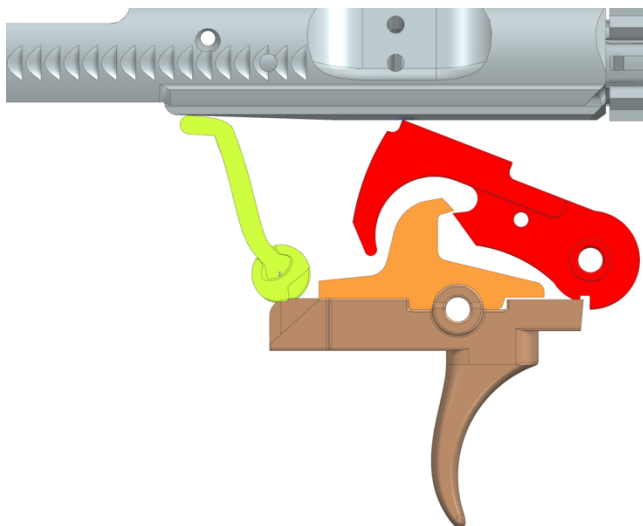
whereupon in a second mode,

rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook is prevented from holding the hammer,

When in the second (“forced reset” semi-automatic) mode,

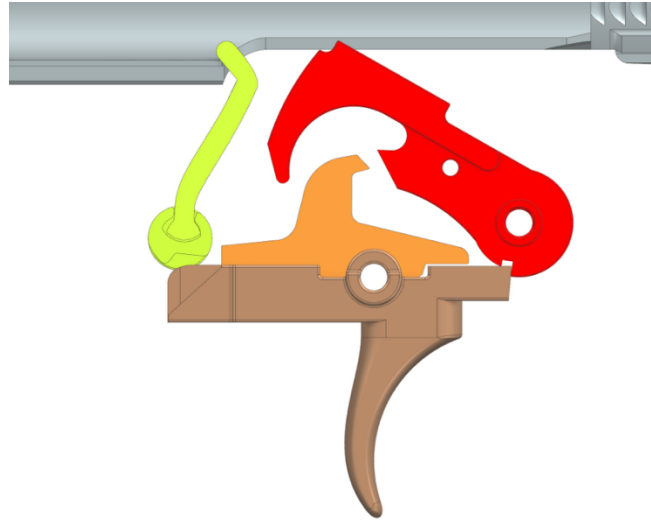


...rearward movement of the bolt means causes rearward pivoting of the hammer (red) and the cam to mechanically move the trigger member toward the reset position such that the disconnecter (orange) hook is prevented from holding the hammer hook.



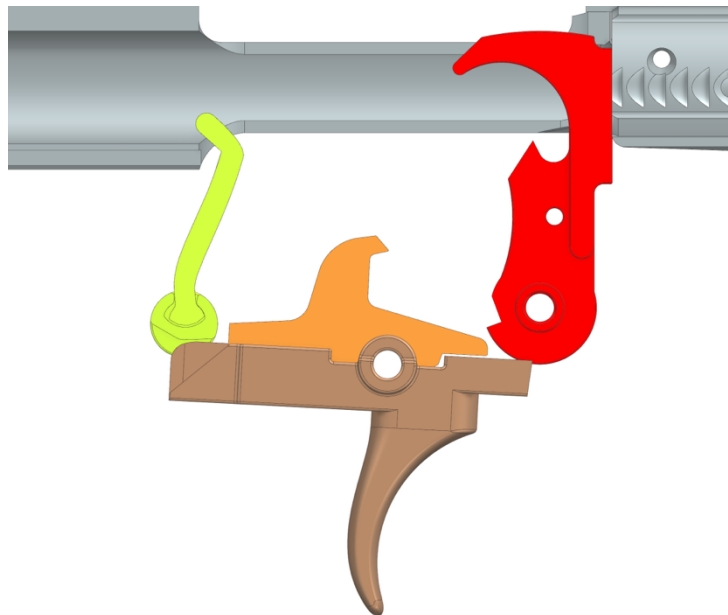
and thereafter the bolt means moves forward into battery,

Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position,

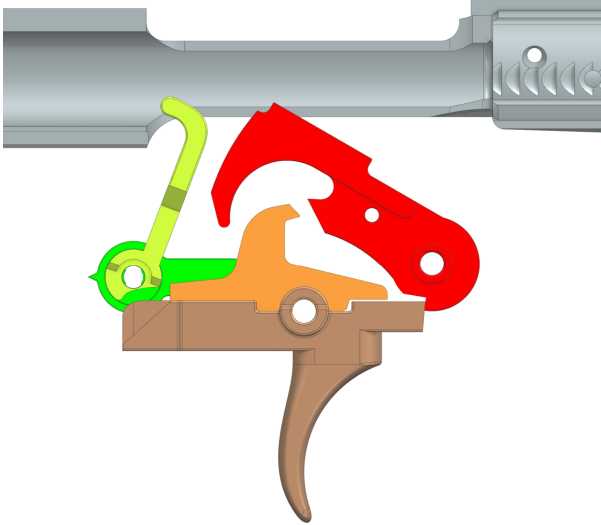


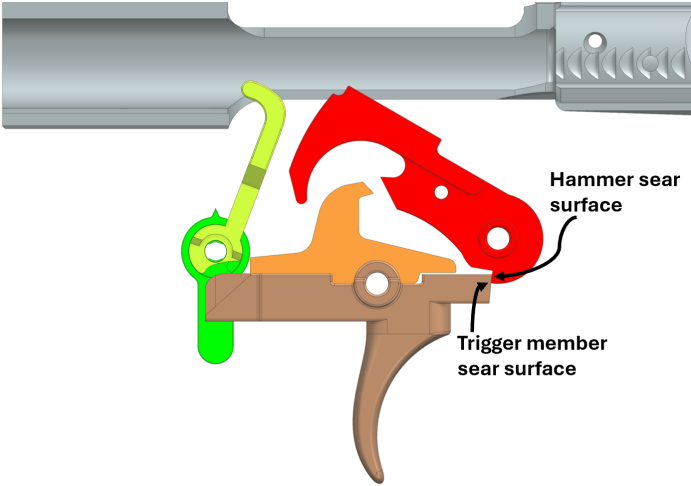
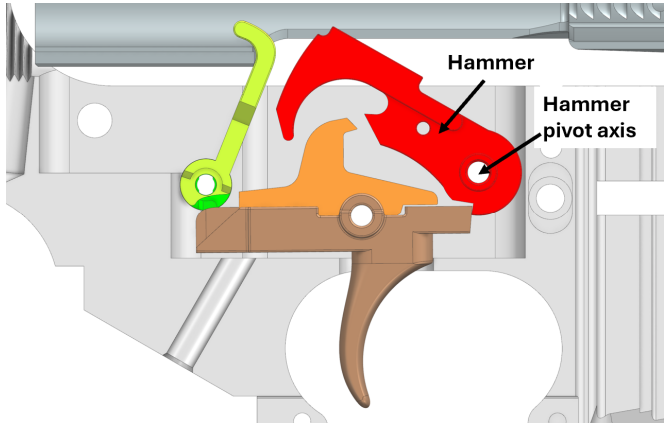
at which time the user can pull the trigger member to fire the firearm.

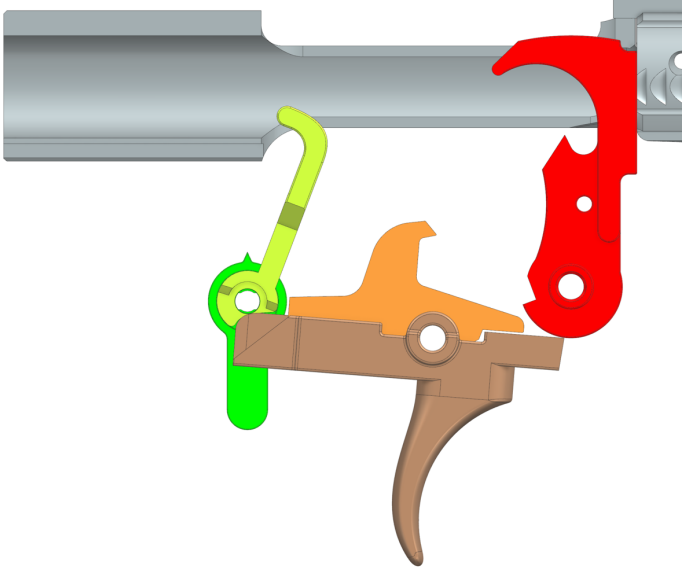
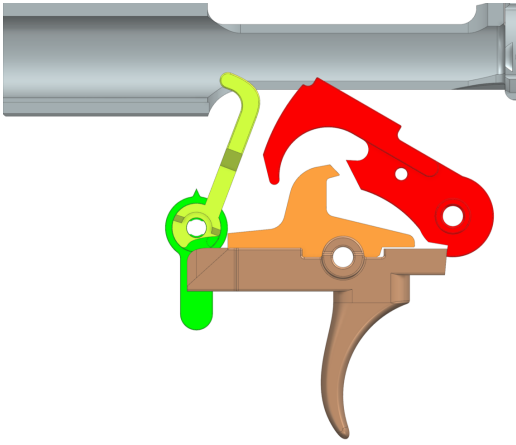
... at which time the user can pull the trigger member (brown) to fire the firearm without having to first release pressure on the trigger member.

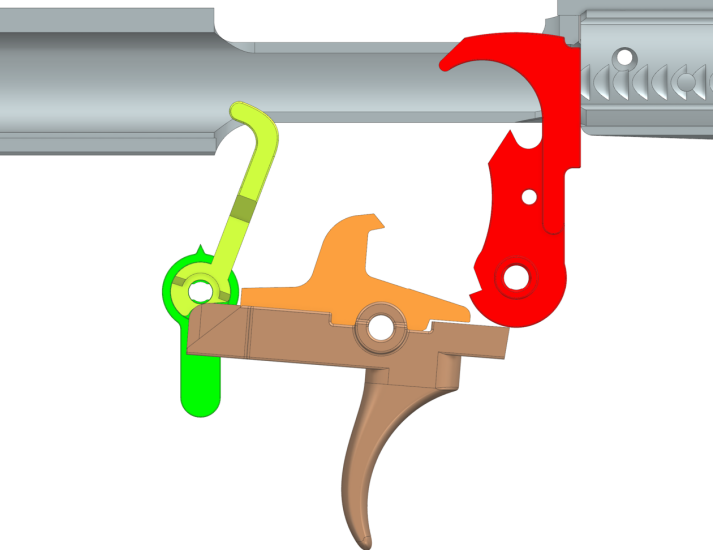
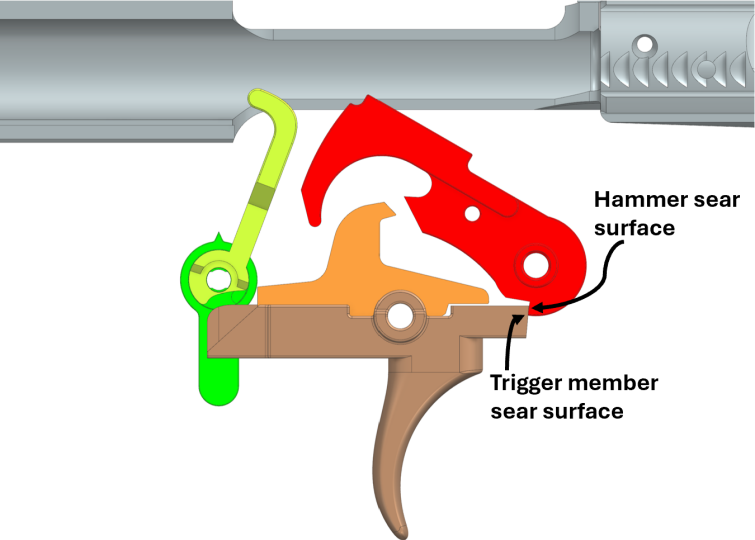


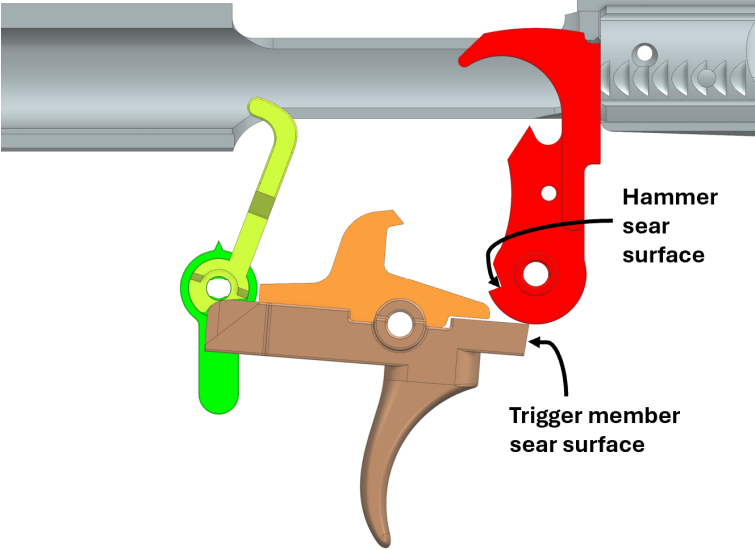
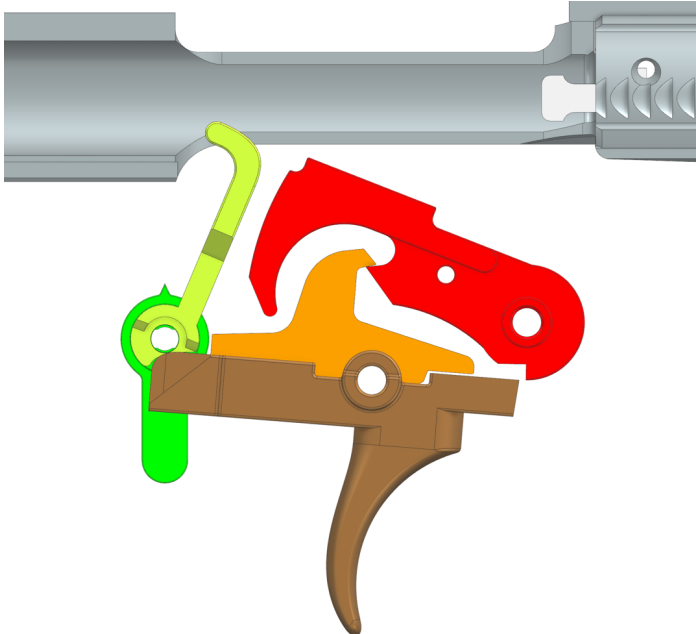
90. An exemplary comparison of the Atrius Selector, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

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

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

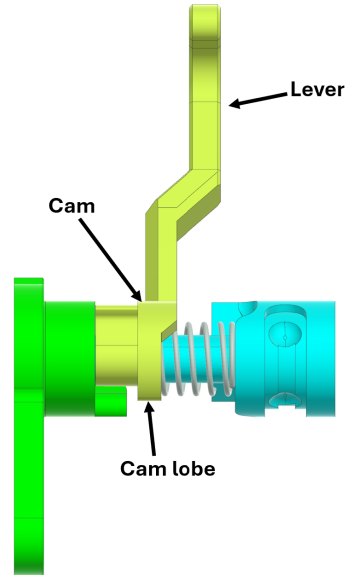
'159 Patent, Claim 1	The Atrius Selector
	 Hammer Released Position
a trigger member having a trigger sear surface and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot axis between set and	The Atrius Selector (yellow) is installed with a trigger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

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

'159 Patent, Claim 1	The Atrius Selector
	 Hammer sear surface Trigger member sear surface Trigger Member and Hammer Member Released Positions
the disconnecter having a hook for engaging the hammer and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis, and	The disconnecter (orange) is adapted to be mounted in the fire control mechanism pocket to pivot on a transverse disconnecter pivot axis. The disconnecter has a hook for engaging the hammer (red).  Disconnecter Hook Engaged

a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,

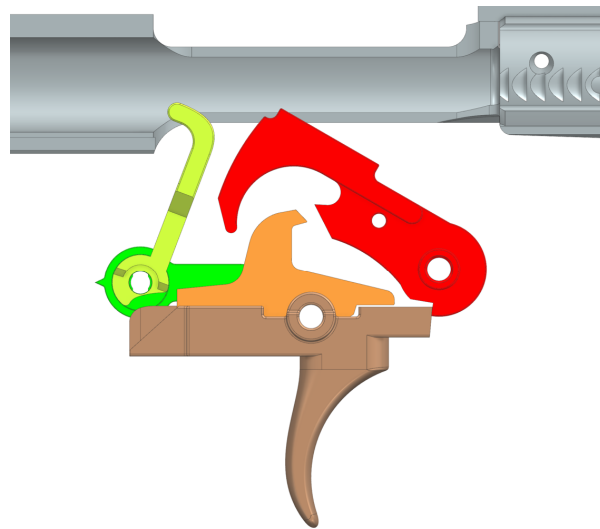
The Atrius Selector has a cam with a cam lobe and lever that is adapted to be movably mounted in the fire control mechanism pocket. (See image above depicting Atrius Selector, shown in yellow, in fire control mechanism pocket)



Atrius Selector Cam with Lobe and Lever

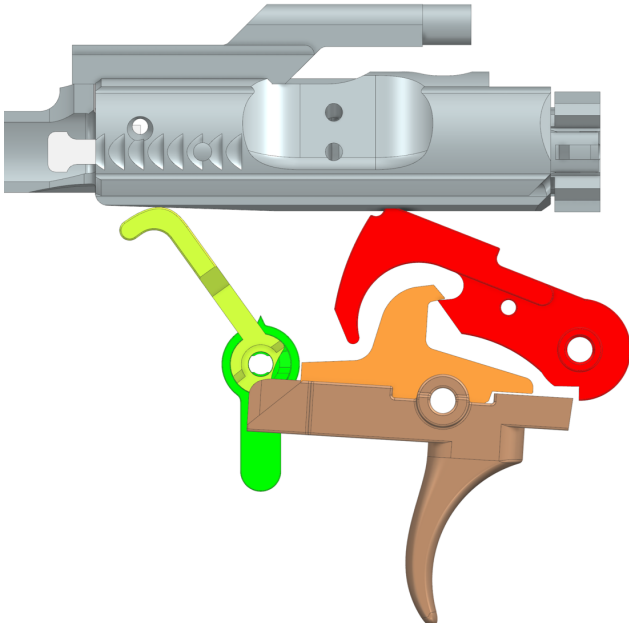
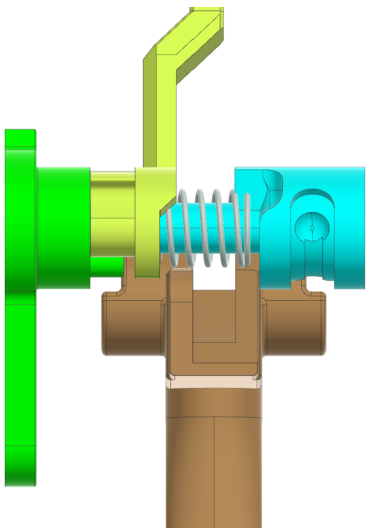
the cam being movable between a first position and a second position, in the second position the cam lobe forces the trigger member toward the set position,

The cam is movable between a first position and a second position.



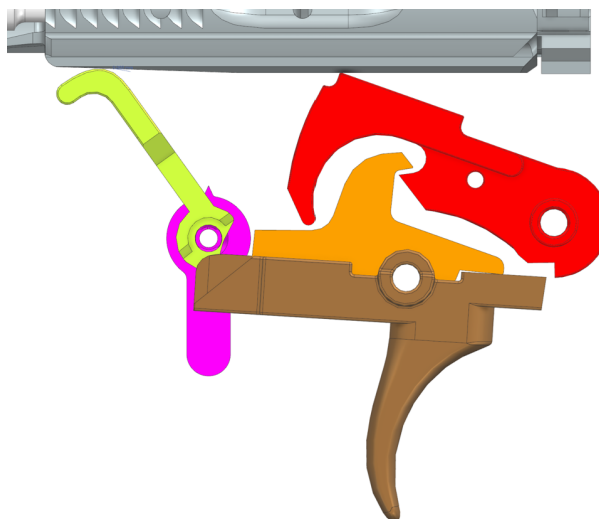
Cam and Lobe First Position

In the second position, the cam lobe mechanically moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.

	 Cam and Lobe Second Position
whereupon in the first mode,	While in the first (standard semi-automatic) mode,  Cam in the First (Semi-Automatic) Mode

rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook,

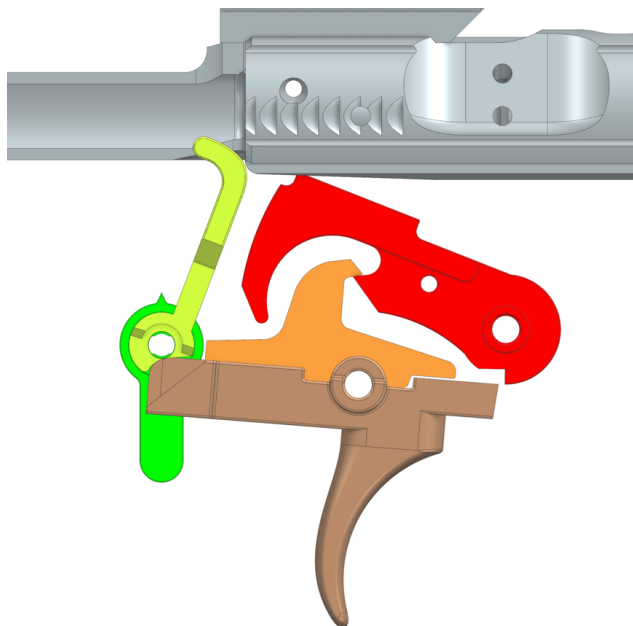
... rearward movement of the bolt means causes rearward pivoting of the hammer (red) such that the disconnecter (orange) hook catches the hammer hook.

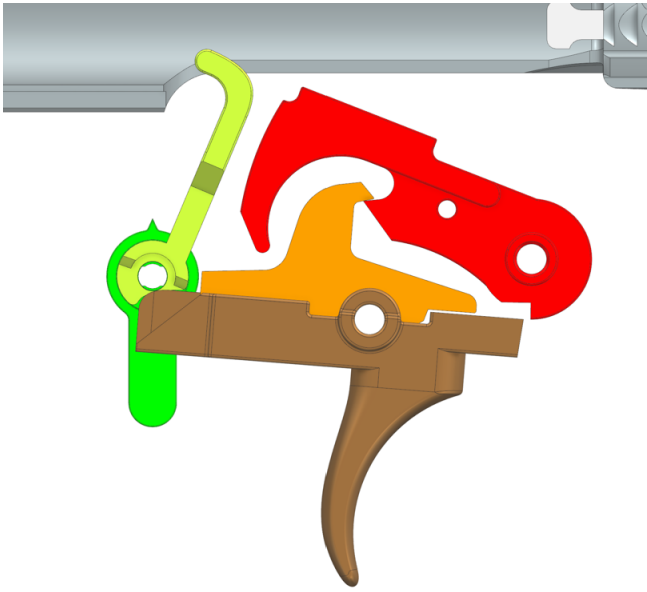
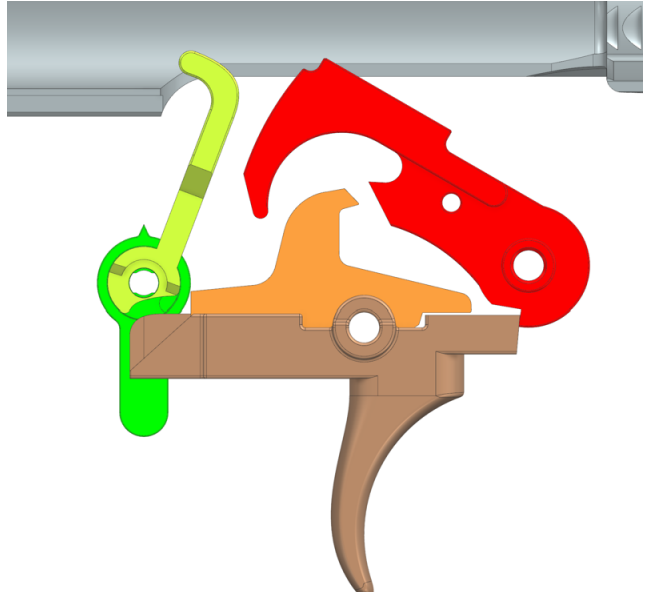


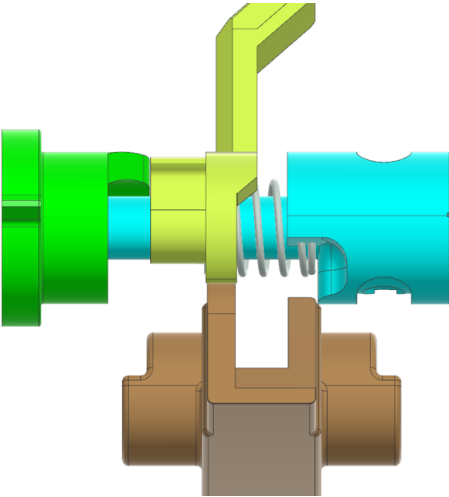
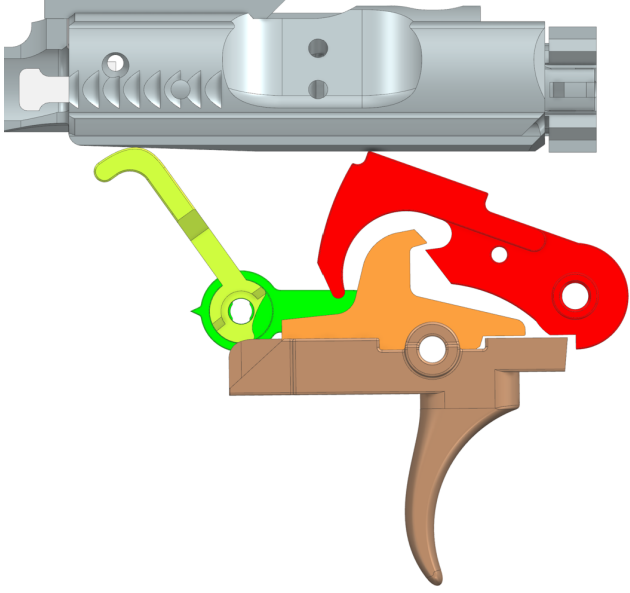
Disconnecter Hook Catches the Hammer

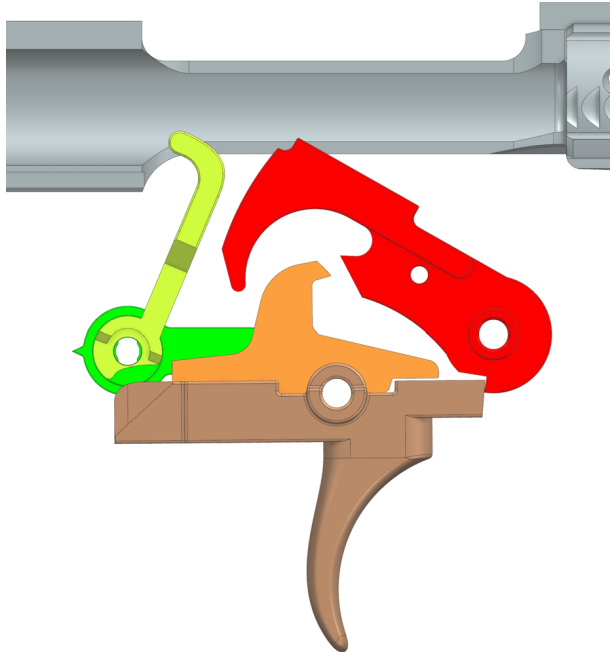
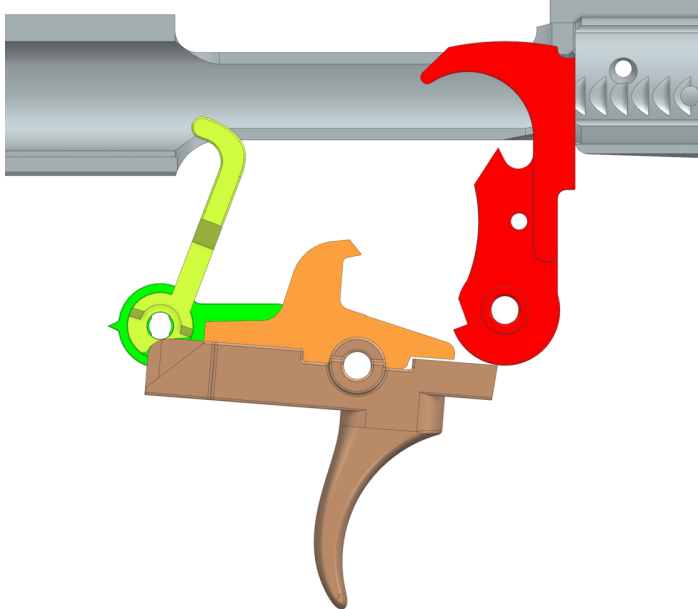
and thereafter the bolt means moves forward into battery,

Thereafter, the bolt means moves forward into battery,



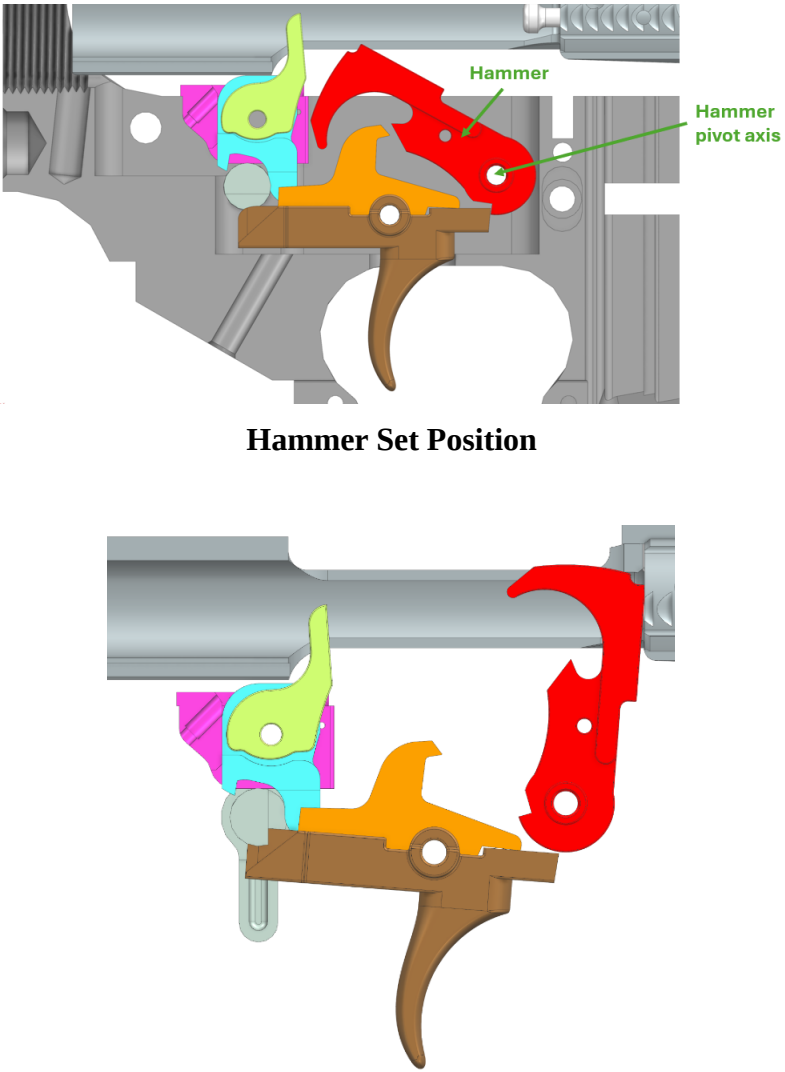
	 Pressure on Trigger Member Prevents Reset
at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnecter to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm, and	... at which time a user must manually reduce pressure on the trigger member (brown) to free the hammer (red) from the disconnecter (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm.  Reduced Pressure on Trigger Member Allows Reset)

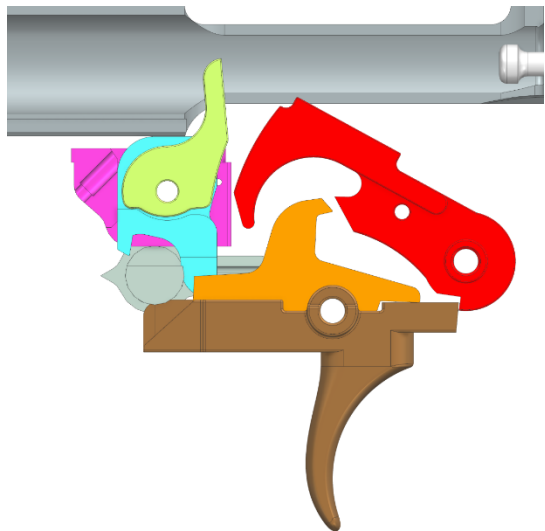
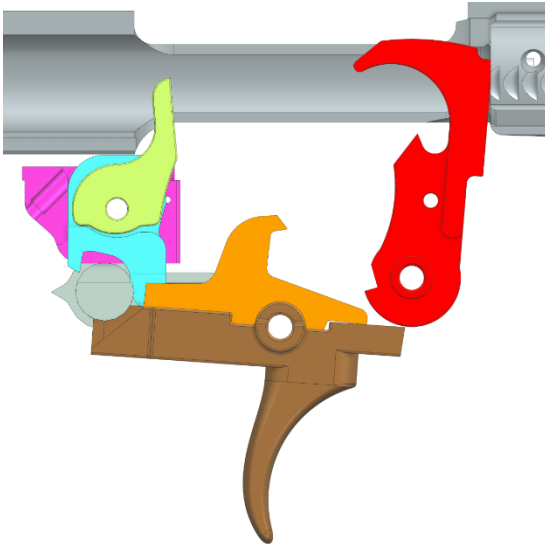
whereupon in a second mode,	When in the second (“forced reset” semi-automatic) mode,  Cam in the Second (“Forced Reset” Semi-Automatic) Mode
rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook is prevented from holding the hammer,	. . . rearward movement of the bolt means causes rearward pivoting of the hammer (red) and the cam to move the trigger member toward the reset position such that the disconnecter (orange) hook is prevented from holding the hammer hook. 

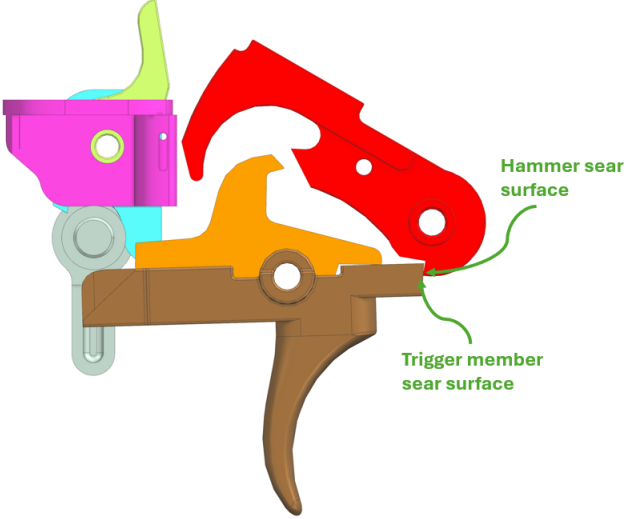
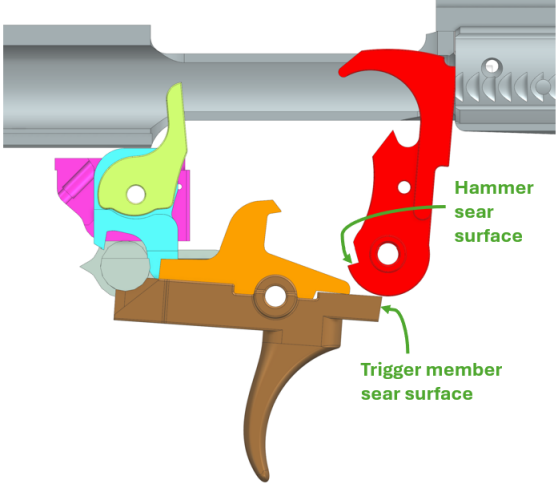
and thereafter the bolt means moves forward into battery,	Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position, 
at which time the user can pull the trigger member to fire the firearm.	... at which time the user can pull the trigger member (brown) to fire the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

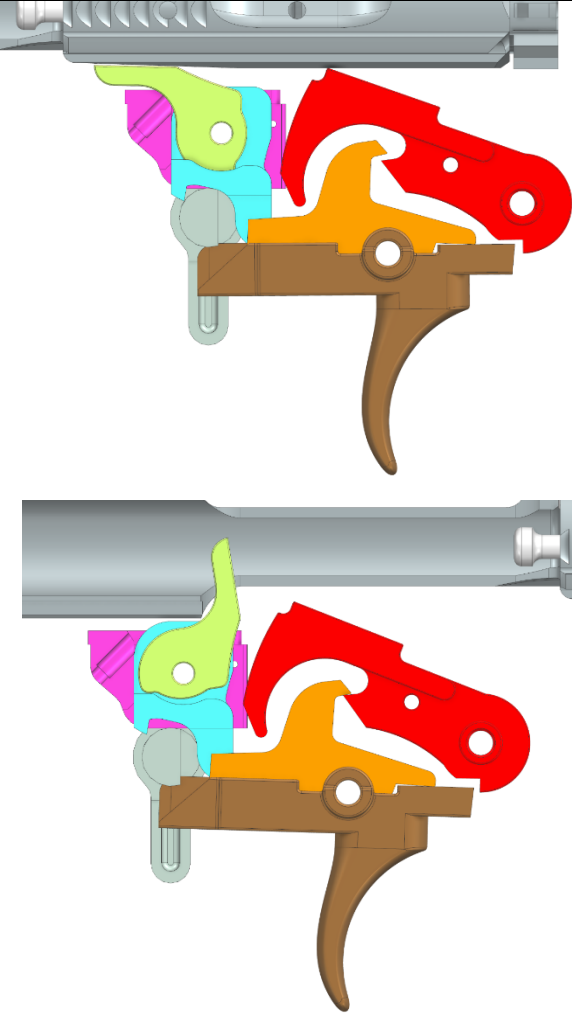
91. An exemplary comparison of the Kabuto, when assembled and used as intended, with claim 1 of the '159 Patent is illustrated in the chart below:

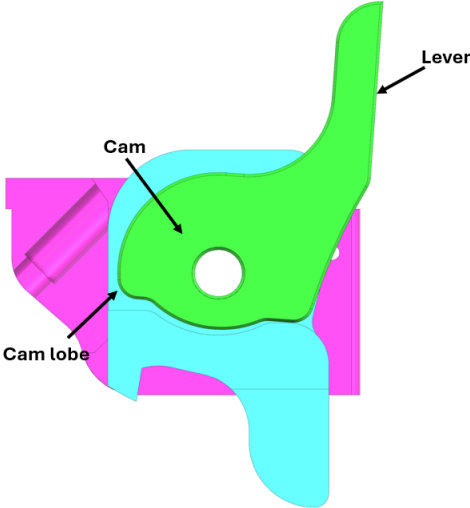
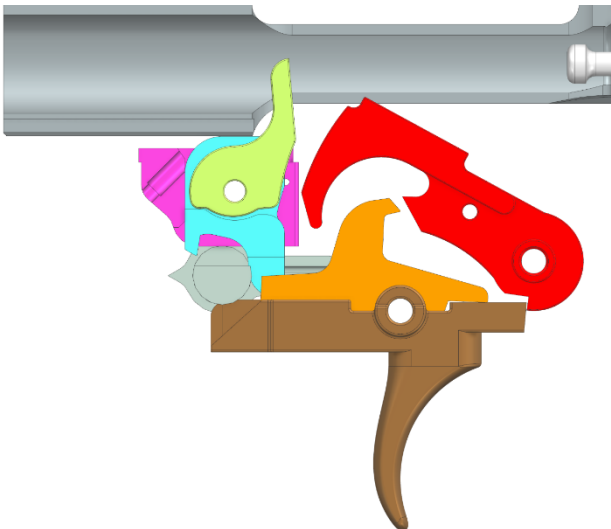
'159 Patent, Claim 1	The Kabuto
1. A firearm trigger mechanism for a firearm having a fire control mechanism pocket and a reciprocating bolt means, the trigger mechanism operable in a first, standard semi-automatic mode and in a second, forced reset semi-automatic mode, the mechanism comprising:	When installed and used as directed, the Kabuto is part of a trigger mechanism that uses a bolt means, for example, a bolt carrier assembly or a blow-back bolt. With the Kabuto installed, the trigger mechanism operates in a standard semi-automatic mode and a “forced reset” semi-automatic mode Kabuto
a hammer having a sear surface and a hook for engaging a disconnector and adapted to be mounted in a fire control mechanism pocket of a receiver	The Kabuto (yellow, blue, and purple) is installed in a fire control mechanism pocket of a receiver along with a hammer (red) that has a sear surface and a hook for engaging a disconnector (orange). (Plaintiff-generated renderings of Kabuto here and below)
to pivot on a transverse hammer pivot axis between set and released positions, the hammer	The hammer (red) pivots on a transverse hammer pivot axis between set and released positions, depicted below. The hammer is adapted to be pivoted rearward by rearward movement of a bolt means.

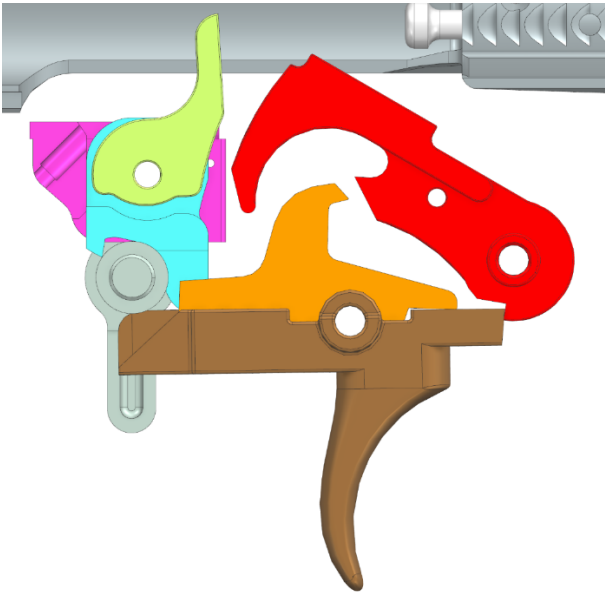
'159 Patent, Claim 1	The Kabuto
adapted to be pivoted rearward by rearward movement of a bolt means,	 Hammer Set Position Hammer Released Position
a trigger member having a trigger sear surface and adapted to be mounted in the fire control mechanism pocket to pivot on a transverse trigger member pivot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

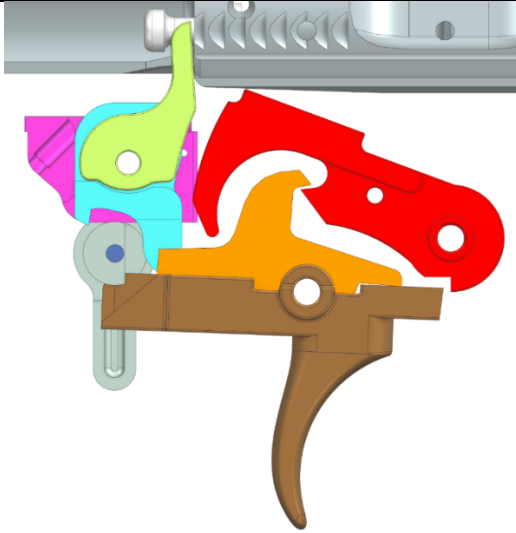
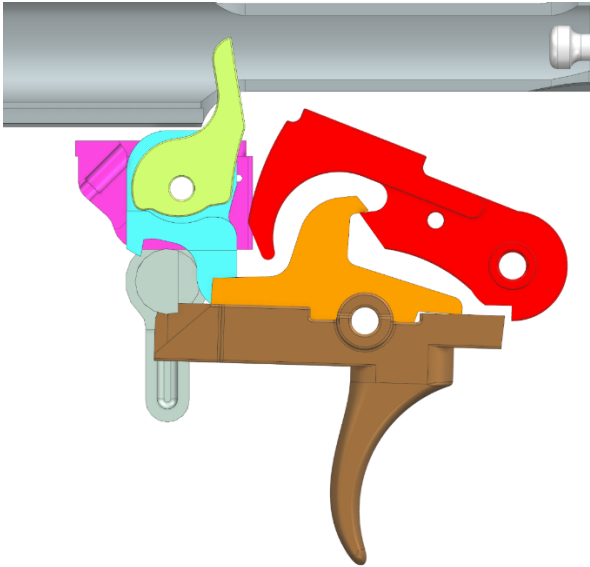
between set and	 Trigger Member Set Position
released positions,	 Trigger Member Released Position
wherein the trigger member sear surface and hammer sear surface are in engagement in the set positions of the hammer and trigger member	The sear surface of the trigger member (brown) and sear surface of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

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

	 Disconnector Hook Engaged
a cam having a cam lobe and adapted to be movably mounted in the fire control mechanism pocket,	The Kabuto 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 Kabuto, shown in green, blue, and purple, in fire control mechanism pocket)

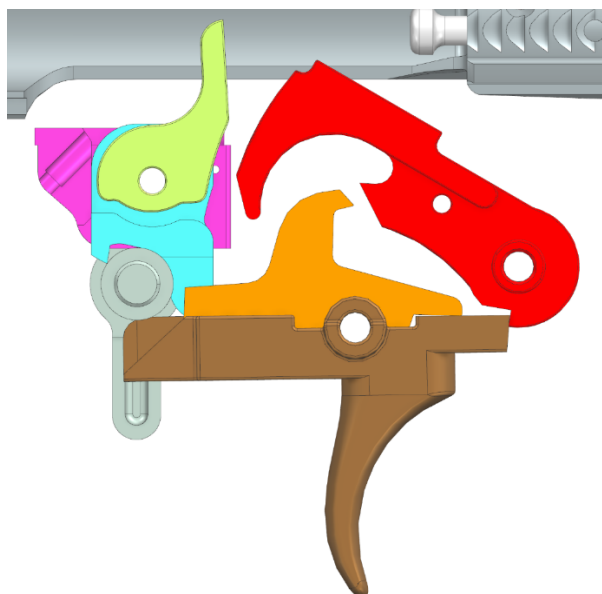
	 Kabuto Cam with Lobe and Lever
the cam being movable between a first position and a second position, in the second position the cam lobe forces the trigger member toward the set position,	The cam is movable between a first position and a second position.  Cam and Lobe First Position In the second position, the cam lobe moves the trigger member (brown) toward the set position when the cam is in the “forced reset” semi-automatic mode.

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

	 Disconnecter Hook Catches the Hammer
and thereafter the bolt means moves forward into battery,	Thereafter, the bolt means moves forward into battery,  Pressure on Trigger Member Prevents Reset

at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnector to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm, and

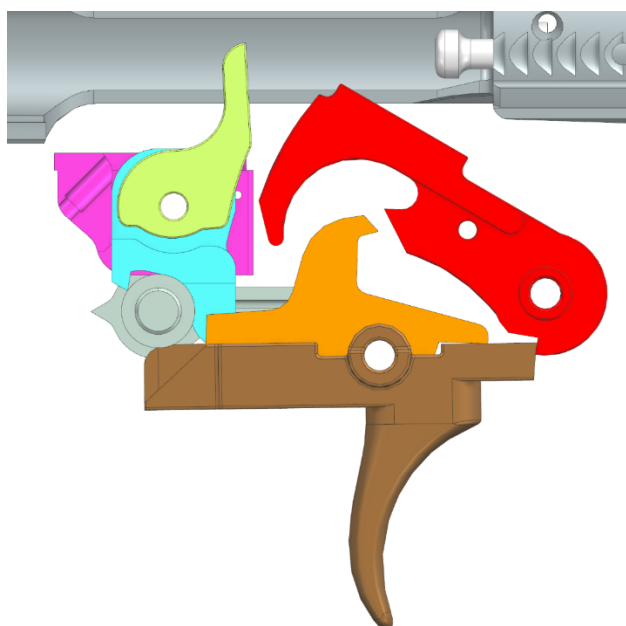
... at which time a user must manually reduce pressure on the trigger member (brown) to free the hammer (red) from the disconnector (orange) to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm.



Reduced Pressure on Trigger Member Allows Reset

whereupon in a second mode,

When in the second ("forced reset" semi-automatic) mode,



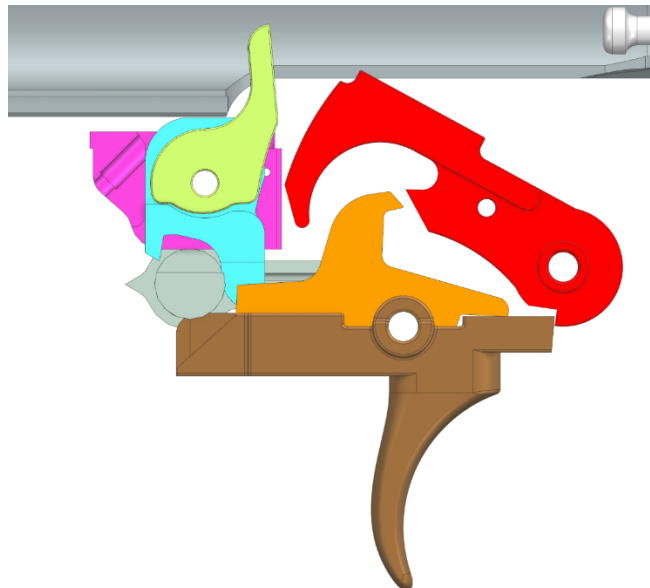
rearward movement of the bolt means causes rearward pivoting of the hammer such that the disconnecter hook is prevented from holding the hammer,

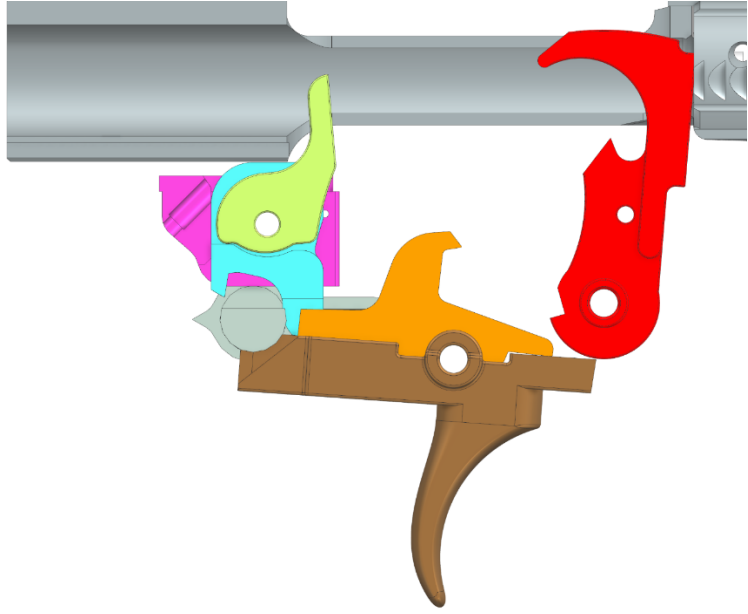
. . . rearward movement of the bolt means causes rearward pivoting of the hammer (red) and the cam (yellow) acting on the link (blue) to move the trigger member toward the reset position such that the disconnecter (orange) hook is prevented from holding the hammer hook.



and thereafter the bolt means moves forward into battery,

Thereafter, the bolt means moves forward into battery and the hammer moves to its reset position,



at which time the user can pull the trigger member to fire the firearm.	... at which time the user can pull the trigger member (brown) to fire the firearm without having to first release pressure on the trigger member. 
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92. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '159 patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, installation of, encouraging, advertising, promoting, and instructing others to use and/or how to use the Super Safety, Atrius, and Kabuto while selling products.

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

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

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

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

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

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

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

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

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

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

COUNT V — INFRINGEMENT OF THE '403 PATENT

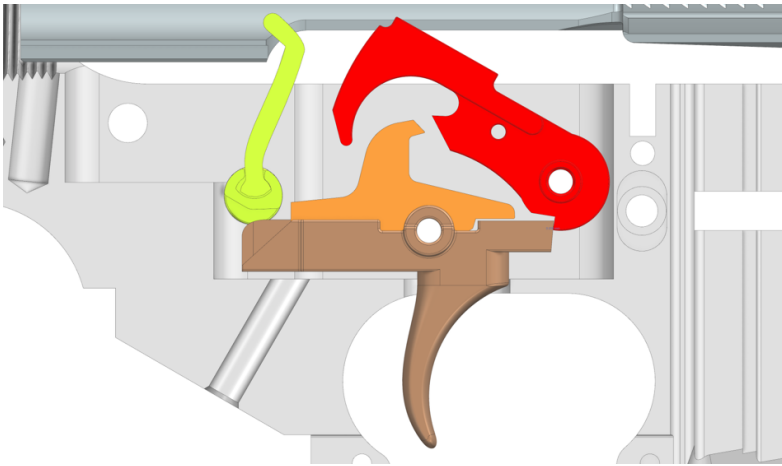
102. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

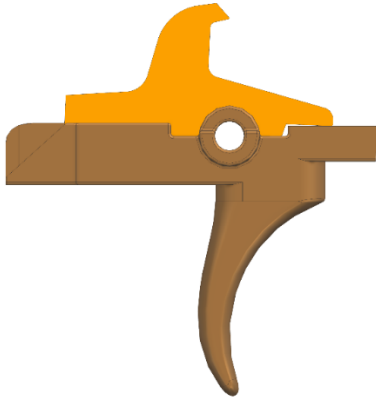
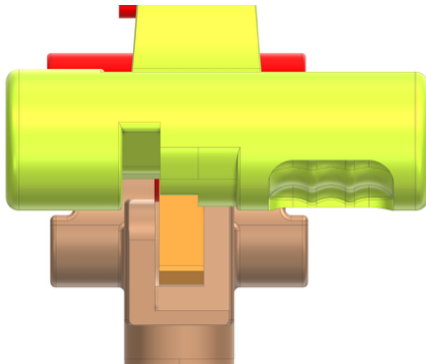
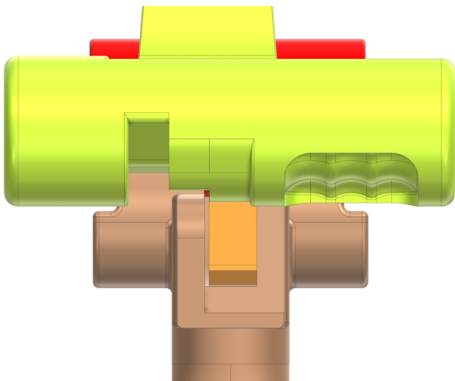
103. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '403 patent, including but not limited to claims 38 and 54, literally and/or under the doctrine of equivalents, by among other things, making,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

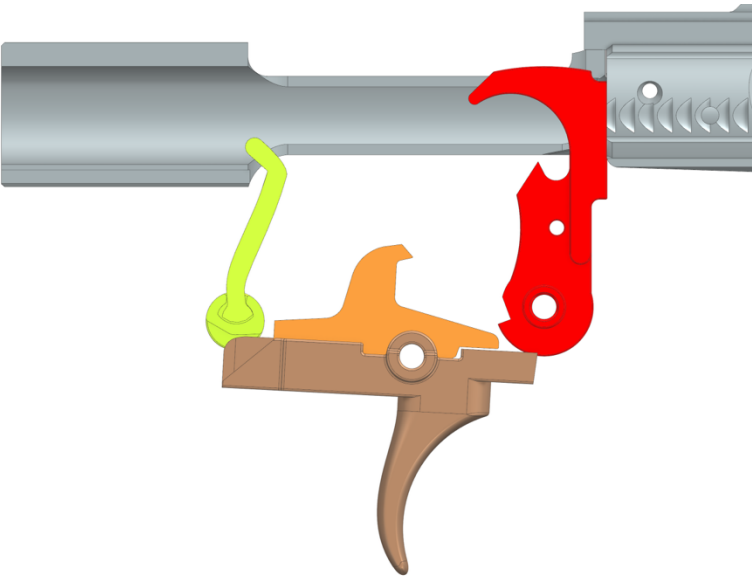
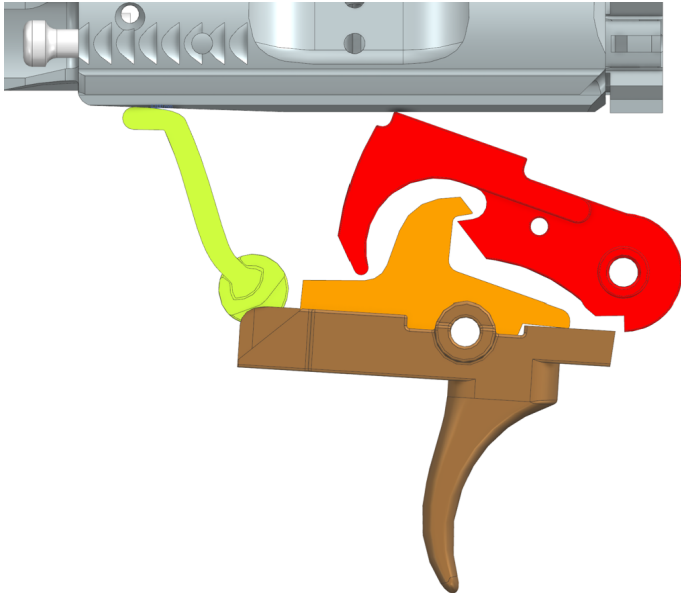
104. On information and belief, Defendants have and continue to willfully infringe, induce others to infringe, and/or contribute to the infringement of one or more claims of the '403 patent, including but not limited to claims 38 and 54, literally and/or under the doctrine of equivalents.

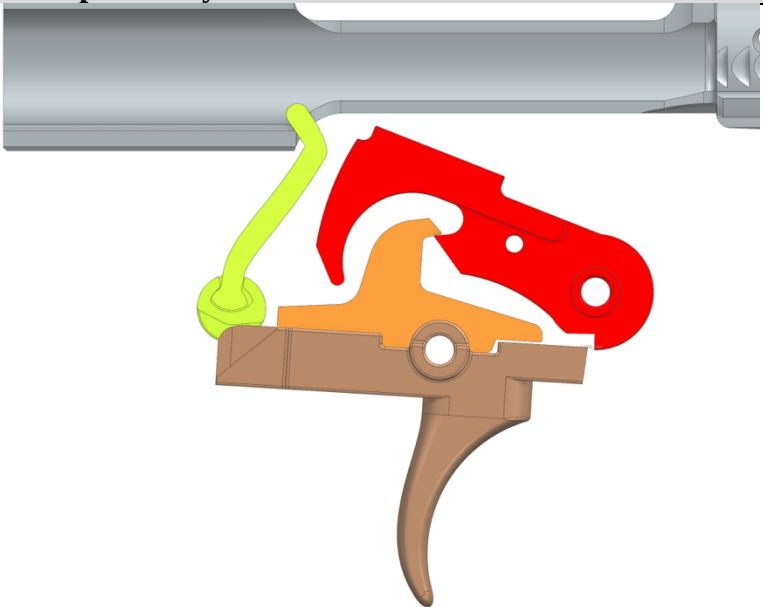
105. An exemplary comparison of the Super Safety, when assembled and used as intended, with claim 38 of the '403 patent is illustrated in the chart below:

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

'403 Patent, Claim 38	The Super Safety
	 Super Safety Ex. F, Super Safety 3D Printed Active Trigger System v4.4, Hoffman Tactical (July 19, 2023) (“Super Safety Guide”) at 12.
a hammer having a hammer hook and adapted to pivot on a transverse hammer pivot axis;	The Super Safety (yellow) is installed in a fire control mechanism pocket along with a hammer (red) that has a hammer hook and pivots on a transverse axis.  Super Safety (Installed) (Plaintiff-generated renderings of Super Safety here and below)
a disconnecter having a disconnecter hook and adapted to pivot on a transverse disconnecter pivot axis; a trigger member; and	The Super Safety is installed along with a disconnecter (orange) which has a disconnecter hook and pivots on a transverse disconnecter pivot axis, and a trigger member (brown)

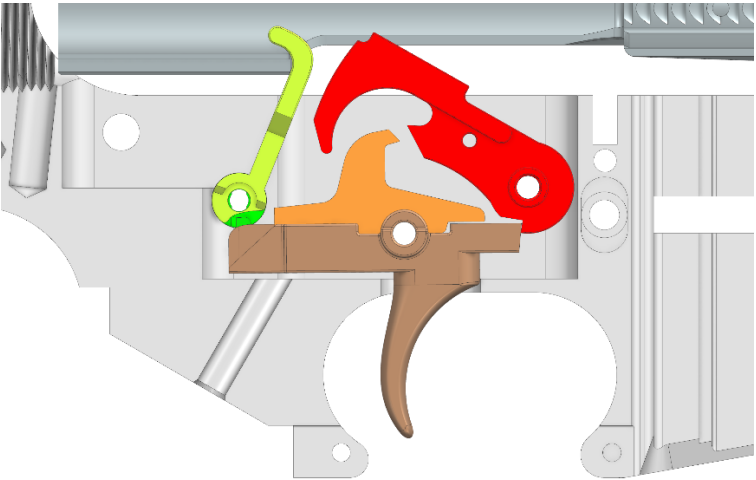
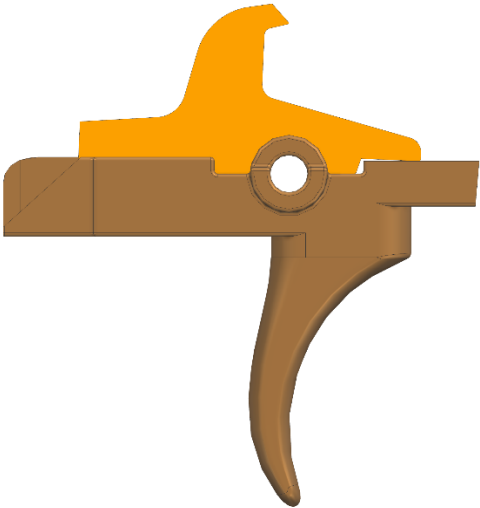
'403 Patent, Claim 38	The Super Safety
	 Disconnecter and Trigger Member
a safety selector adapted to be movable between a standard semi-automatic position and a forced reset semi-automatic position,	The Super Safety is a safety selector adapted to be movable between a standard semi-automatic position,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

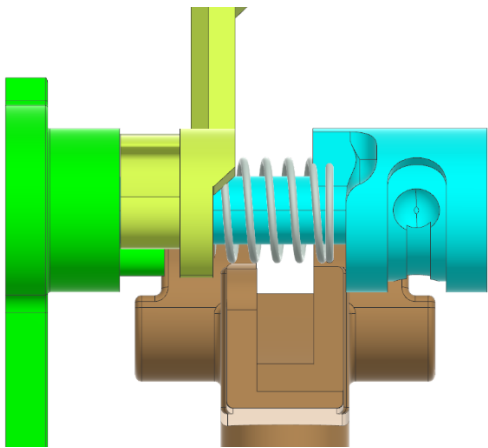
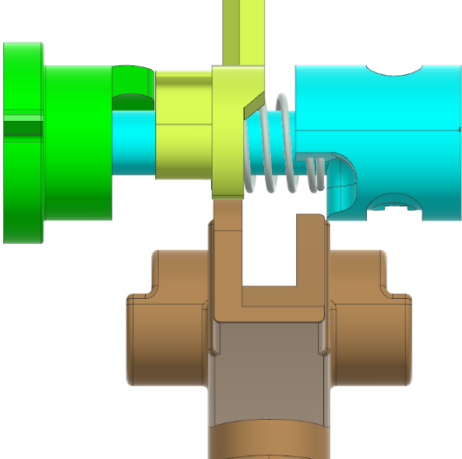
'403 Patent, Claim 38 wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated, and after the hammer pivots rearward to a position where the hammer hook is past the disconnecter hook, rearward pressure on the trigger member must be reduced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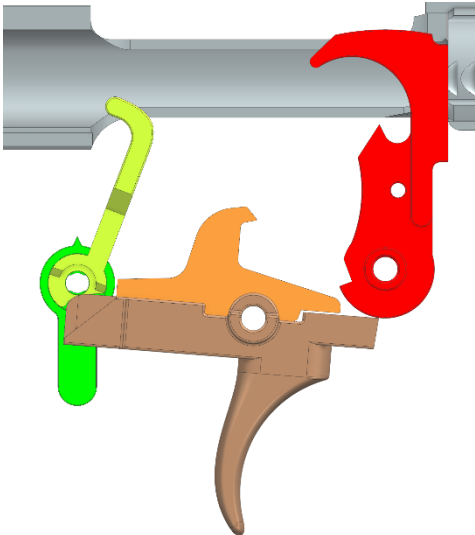
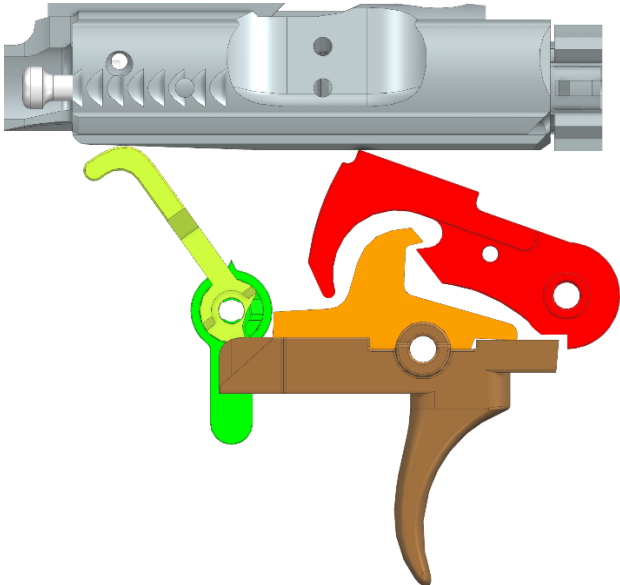
'403 Patent, Claim 38	The Super Safety
	 Pressure must be reduced

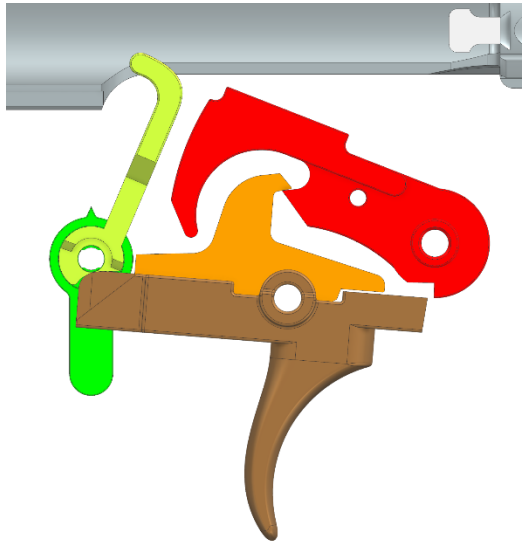
106. An exemplary comparison of the Atrius Selector, when assembled and used as intended, with claim 38 of the '403 Patent is illustrated in the chart below:

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

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

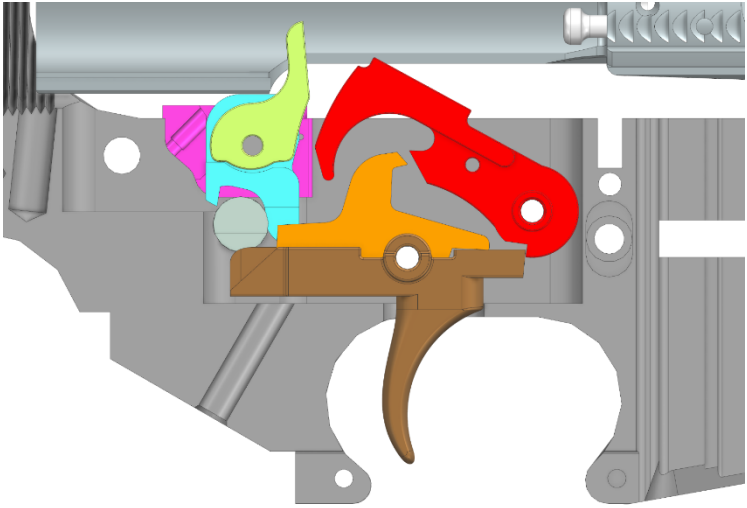
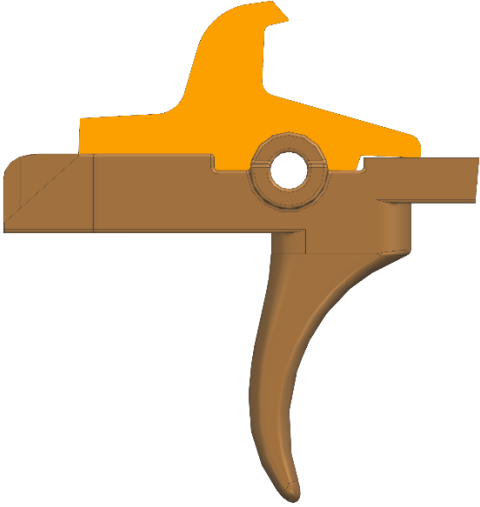
'403 Patent, Claim 38	The Atrius Selector
a safety selector adapted to be movable between a standard semi-automatic position	The Atrius Selector is a safety selector adapted to be movable between a standard semi-automatic position,  Atrius Selector (installed) in Standard Semi-Automatic Position
and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

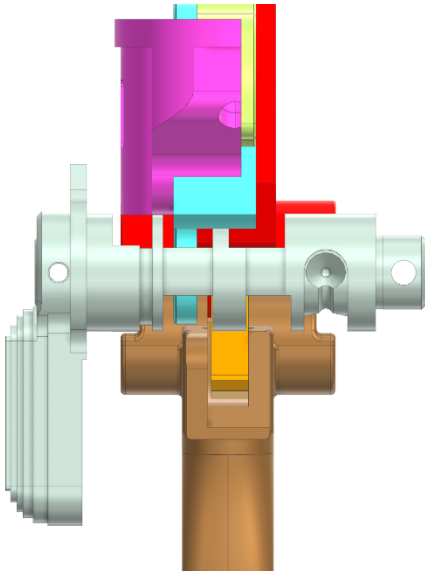
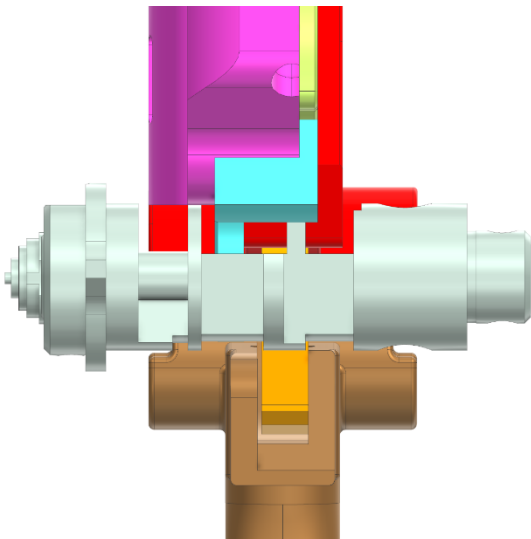
'403 Patent, Claim 38	The Atrius Selector
wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,	When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated. 
and after the hammer pivots rearward to a position where the hammer hook is past the disconnecter hook,	The hammer (red) pivots rearward to a position where the hammer hook is past the disconnecter hook (orange). 

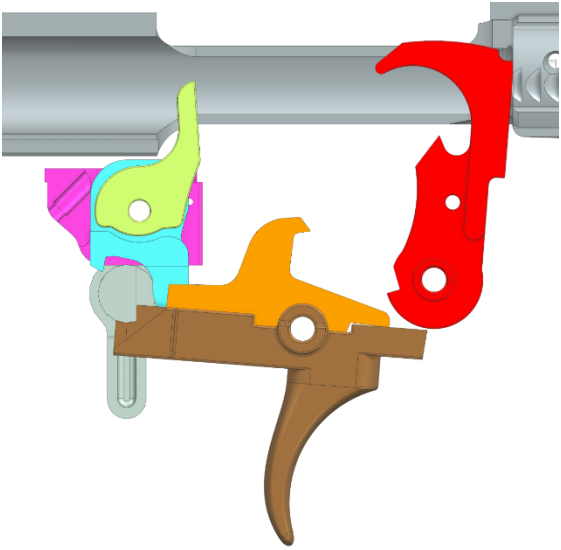
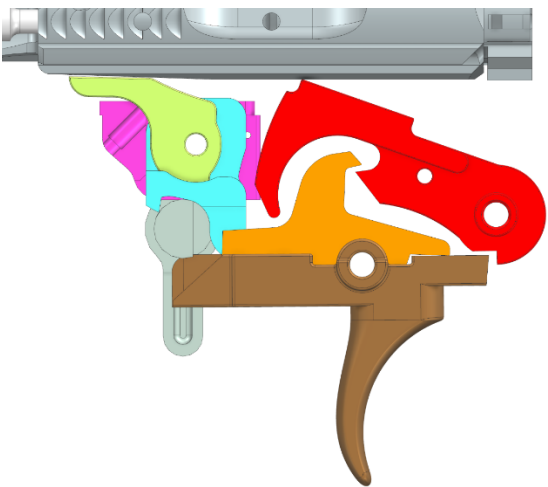
'403 Patent, Claim 38	The Atrius Selector
rearward pressure on the trigger member must be reduced to permit the trigger member to then be actuated to fire a firearm.	Rearward pressure on the trigger member (brown) must be reduced to permit the trigger member to then be actuated to fire a firearm. 

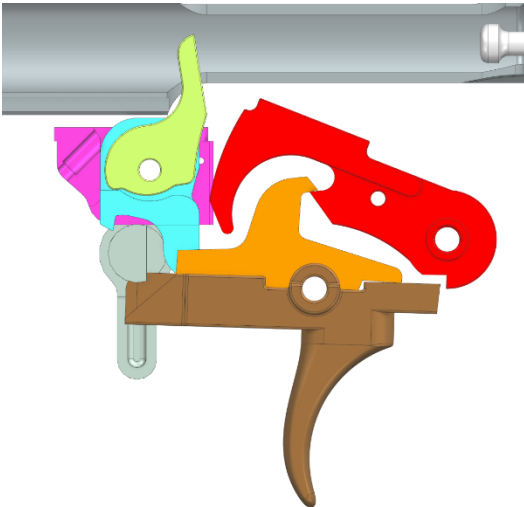
107. An exemplary comparison of the Kabuto, when assembled and used as intended, with claim 38 of the '403 patent is illustrated in the chart below:

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

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

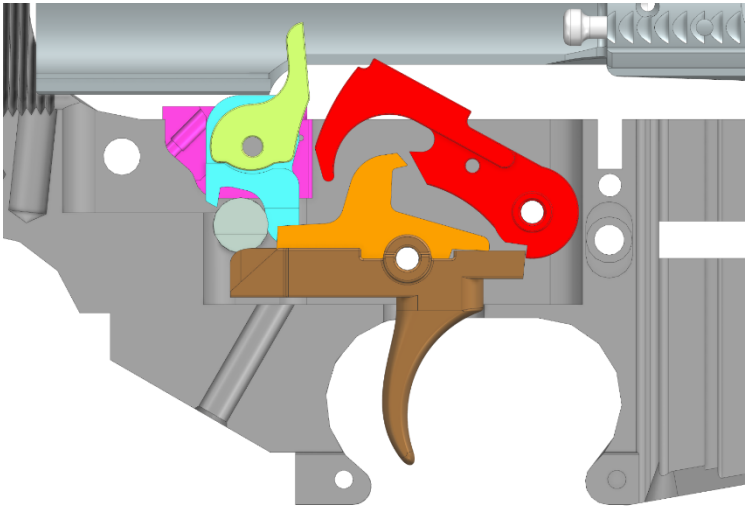
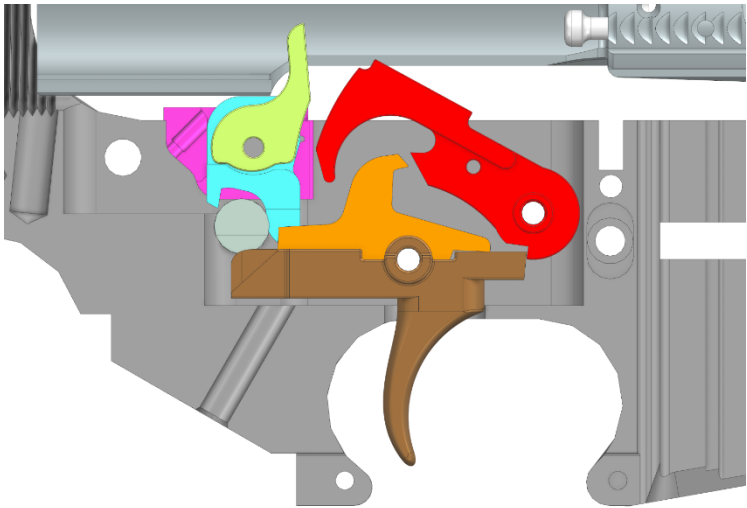
'403 Patent, Claim 38	The Kabuto
a safety selector adapted to be movable between a standard semi-automatic position	The Kabuto interacts with a safety selector adapted to be movable between a standard semi-automatic position,  Kabuto (installed) in Standard Semi-Automatic Position
and a forced reset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

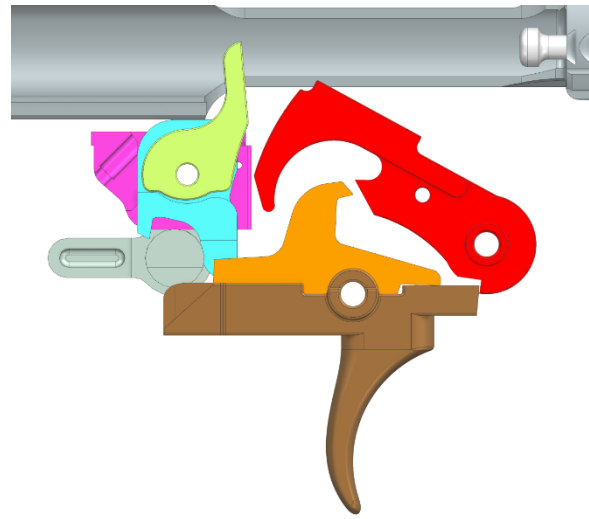
'403 Patent, Claim 38	The Kabuto
wherein when the safety selector is in the standard semi-automatic position and the trigger member is rearwardly actuated,	When safety selector is in the standard semi-automatic position the trigger member (brown) is rearwardly actuated. 
and after the hammer pivots rearward to a position where the hammer hook is past the disconnector hook,	The hammer (red) pivots rearward to a position where the hammer hook is past the disconnector hook (orange), 

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

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

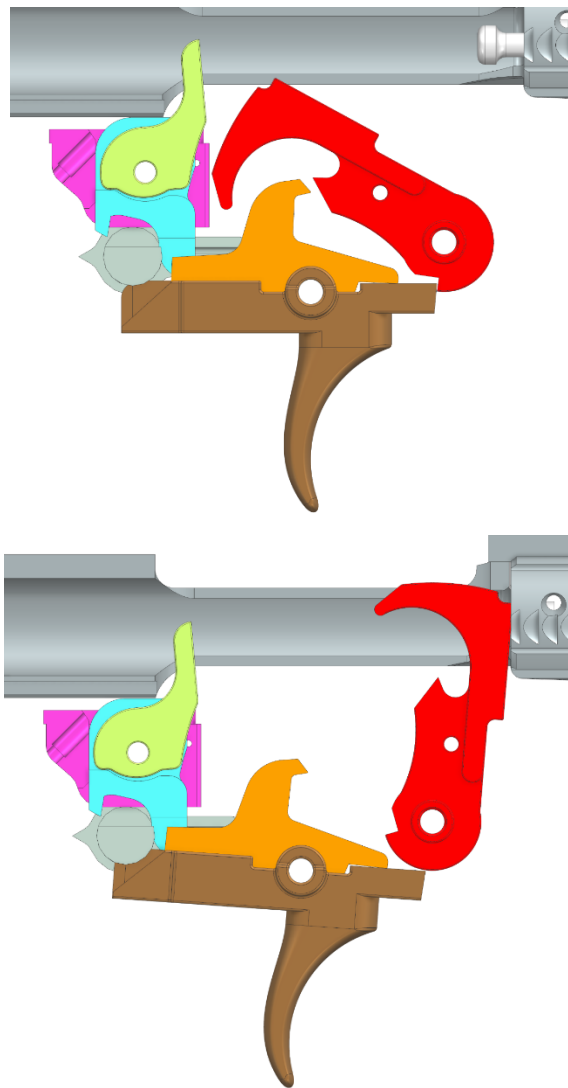
'403 Patent, Claim 54	Kabuto
54. A forced reset trigger mechanism, comprising:	When installed and used as directed, the Kabuto is part of a forced reset trigger mechanism.  Kabuto

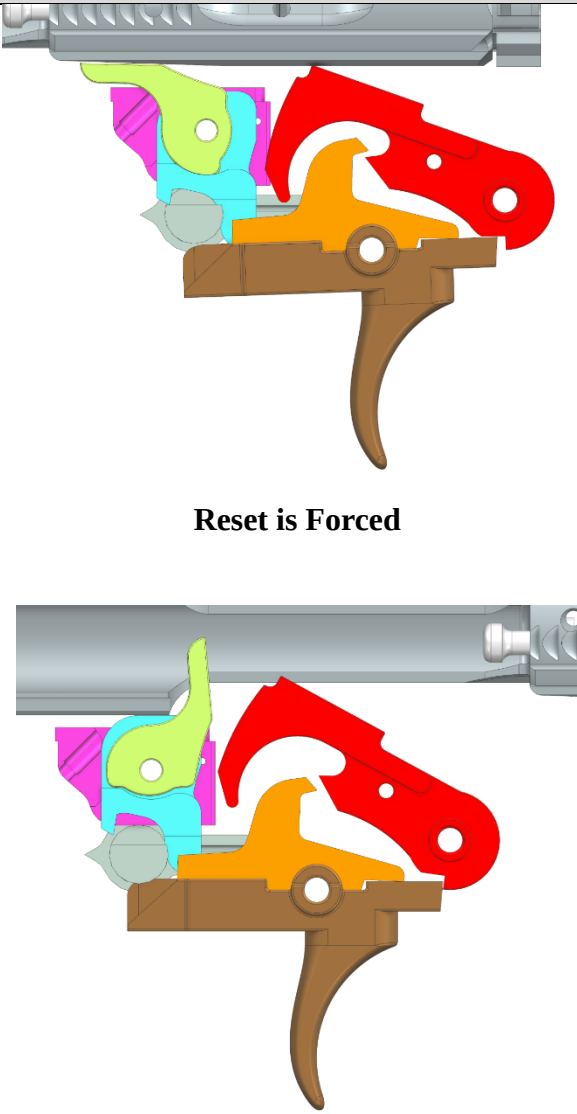
'403 Patent, Claim 54	Kabuto
a trigger member configured to pivot about a transverse axis;	The Kabuto is installed in a fire control mechanism pocket along with a trigger member that is configured to pivot about a transverse axis. 
a hammer	The Kabuto (Green, Blue, and Magenta) is installed in a fire control mechanism pocket along with a hammer (red).  Kabuto (Installed) (Plaintiff-generated renderings of Kabuto above and below)

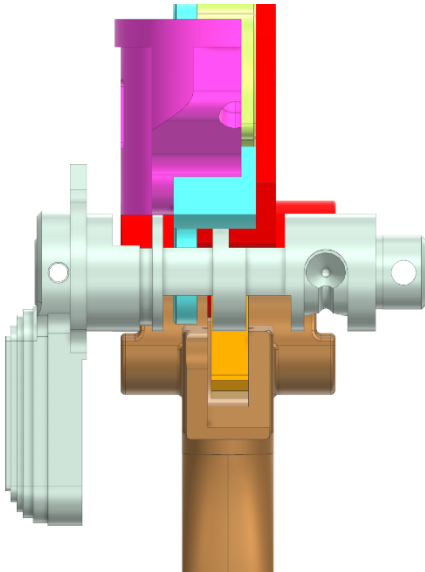
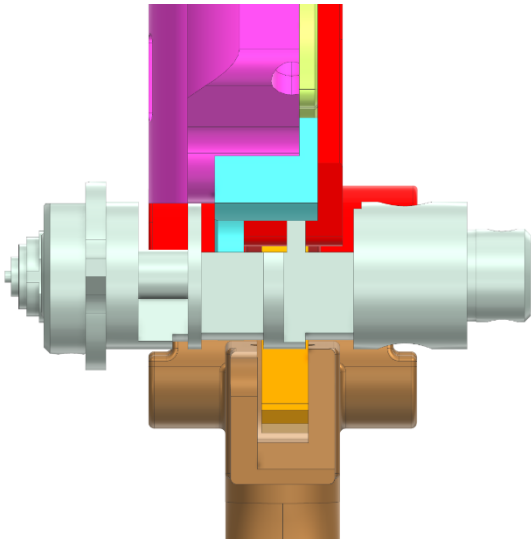
'403 Patent, Claim 54	Kabuto
a disconnecter operatively associated with the trigger member and the hammer;	The Kabuto is installed along with a disconnecter (orange) which is operatively associated with the hammer (Red) and trigger (Brown).  Disconnecter and Trigger Member
a locking member operatively associated with the trigger member;	The Kabuto uses the cam (Green) and link (Blue) in combination as a locking member and they are operatively associated with the trigger member. 

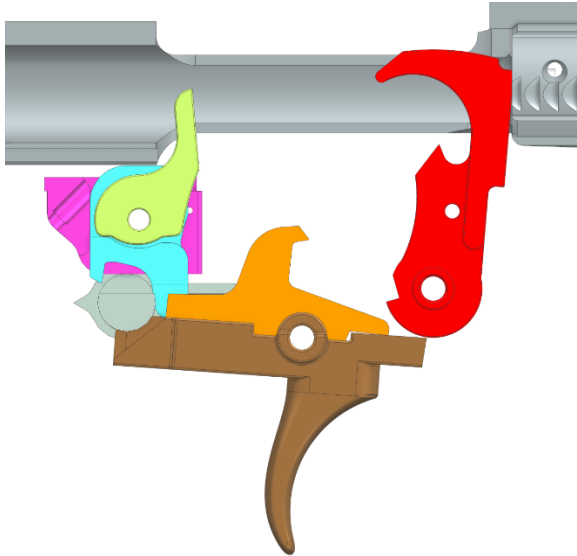
Wherein cycling of the action causes the trigger member to be forcibly returned to a set position in at least one operating mode; and

When using a Kabuto, the cycling of the action causes the trigger member to be forcibly returned to the set position in at least one operating mode.



'403 Patent, Claim 54	Kabuto
	 Reset is Forced

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

'403 Patent, Claim 54	Kabuto
Such that rotation of the selector to the forced reset position enables said forced reset operating mode.	When the safety selector is in the forced reset position the forced reset operating mode is enabled. 

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

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

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

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

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

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

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

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

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

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

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

PRAYER FOR RELIEF

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

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

- g. An award of all other damages permitted by 35 U.S.C. § 284, including increased damages up to three times the amount of compensatory damages found;
- h. An award of all profits received by Defendants from sales and revenues of any kind made as a result of their trademark infringement and unfair competition;
- i. An award of all damages sustained by Plaintiffs as a result of Defendants' infringement, including ascertainable damages, the costs incurred by Plaintiffs for the costs for this action, and Plaintiffs' reasonable attorneys' fees;
- j. 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
- k. Any and all other relief, at law or equity, to which Plaintiffs may show themselves to be entitled or which this Court deems just and proper.

DEMAND FOR JURY TRIAL

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

DATED: July 17, 2026

Respectfully submitted,

/s/ Kevin C. Maxwell

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