

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION**

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

**Rare Breed Triggers, Inc., a Texas
corporation,**

Plaintiffs.

v.

**Geronimo Arms & Ammo LLC, a
Florida limited liability company,**

and

Michael Goldberg, 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 Geronimo Arms & Ammo LLC and Michael Goldberg (collectively, “Defendants”) of infringing U.S. Patent No. 10,514,223 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, Geronimo Arms & Ammo LLC is a limited liability company organized under the laws of Florida with an address of 15202 NW 147th Drive, Alachua, FL 32615.

4. Upon information and belief, Michael Goldberg is an individual residing at 17463 NW 236th Street, High Springs, FL 32643, who is an owner or the owner of Geronimo Arms & Ammo LLC and directs its operations, including directing Geronimo Arms & Ammo LLC to sell products in violation of the Asserted Patent.

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 No. 10,514,223 (“the ’223 Patent”) (“the Asserted Patent”).

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

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

12. Rare Breed is the exclusive licensee of the Asserted Patent.

13. Plaintiffs have complied with the requirements of 35 U.S.C. § 287 either because the Asserted Patent are not practiced by ABC or any licensee and/or because any licensee has been required to mark its product.

14. 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

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

pressure on the trigger member to allow the trigger spring to reset the trigger member, the disconnecter releases the hammer to engage the trigger sear.

16. 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.

17. 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.

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

19. The claims of the Asserted Patent define the scope of the patented inventions.

THE INFRINGING DEVICE

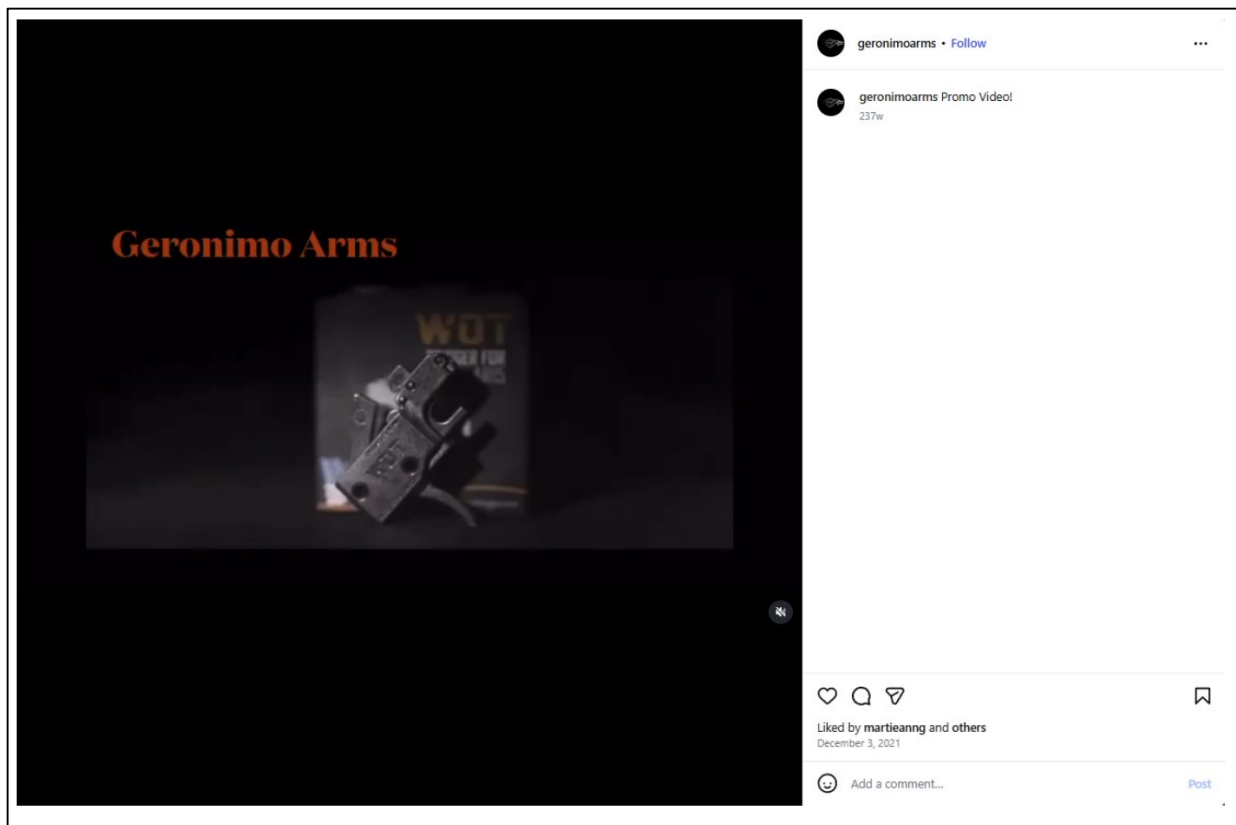
20. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale products that embody the technology claimed in the Asserted Patent, including the following (collectively, the “Infringing Device”):

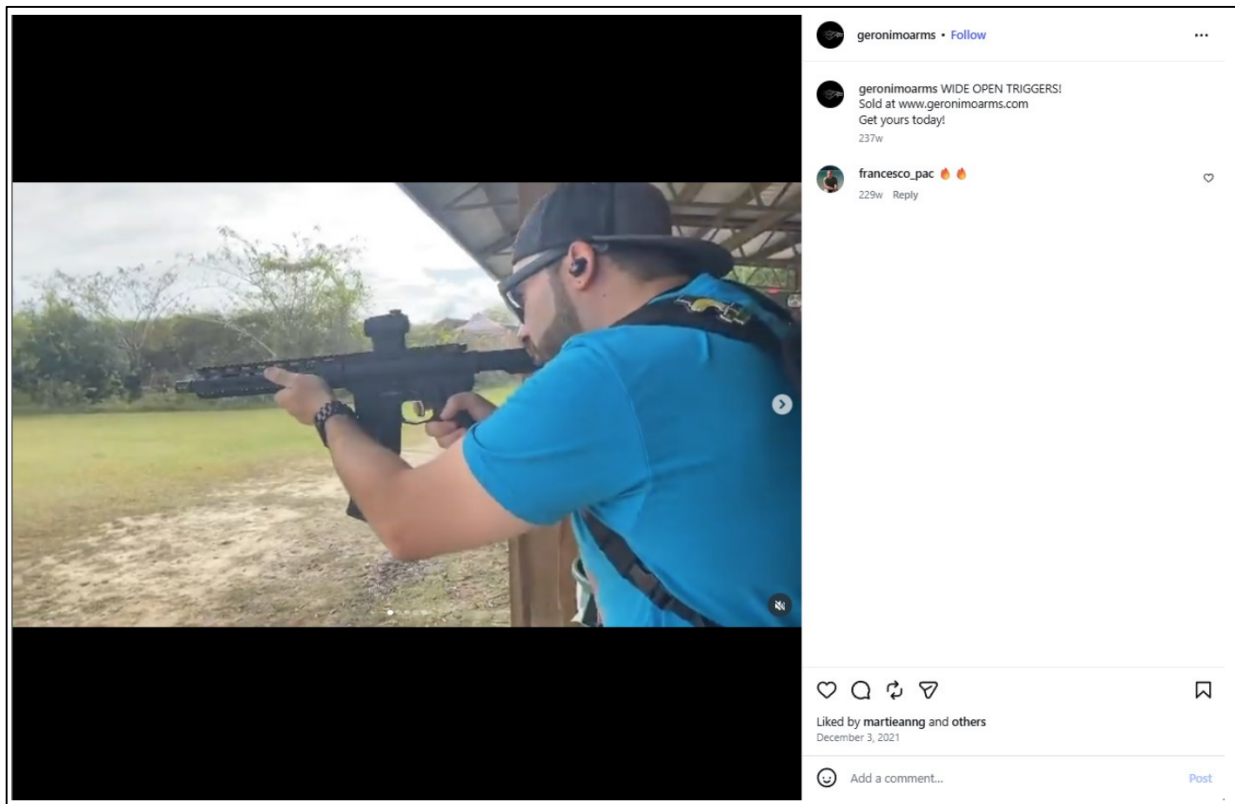
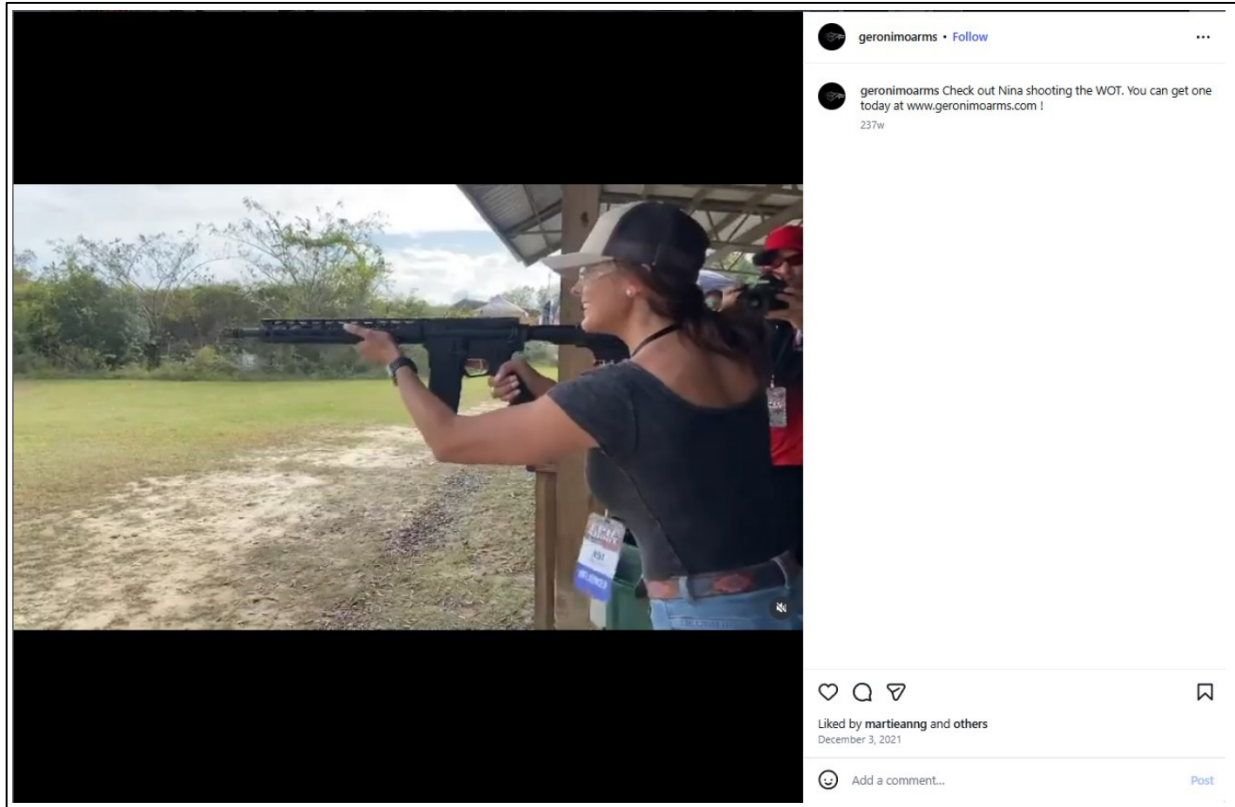
21. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale a (3-Position) Wide Open Trigger (“the WOT”), which embodies the technology claimed in at least the ’223 Patent.

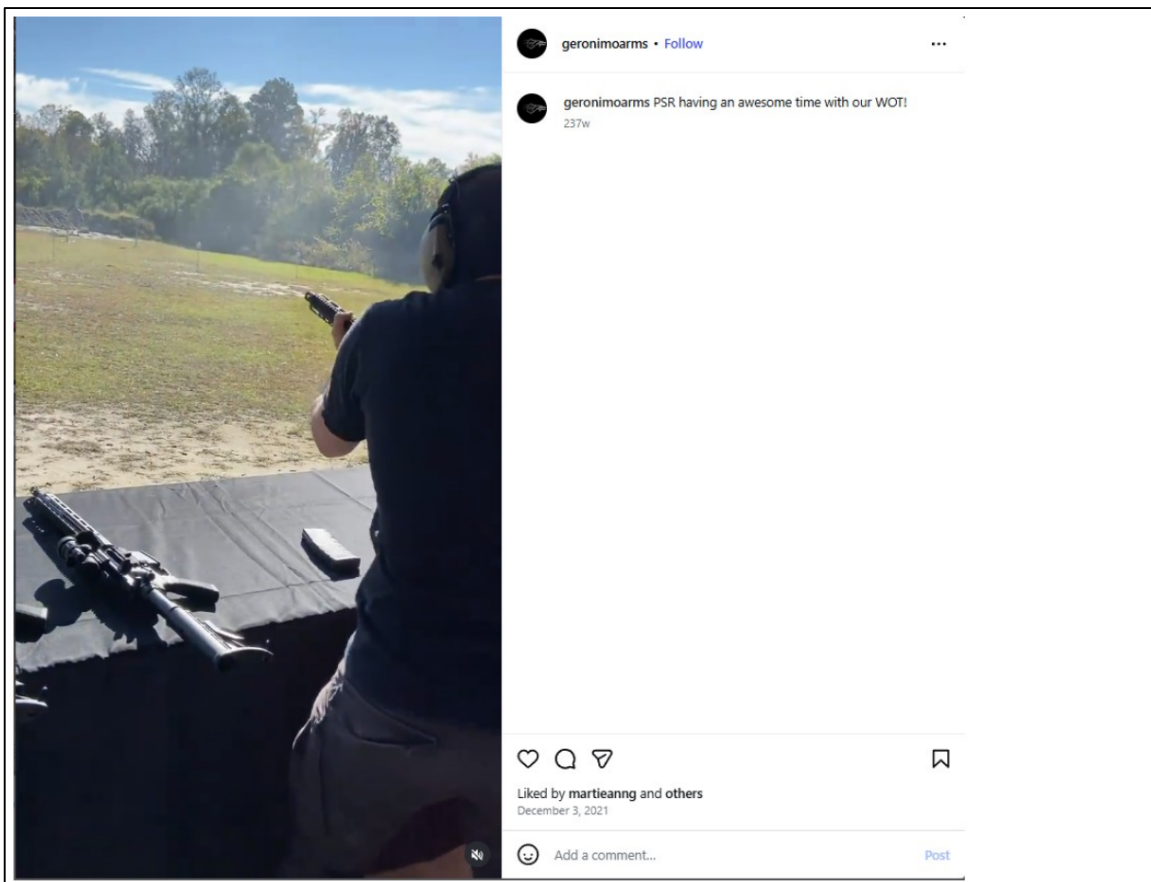
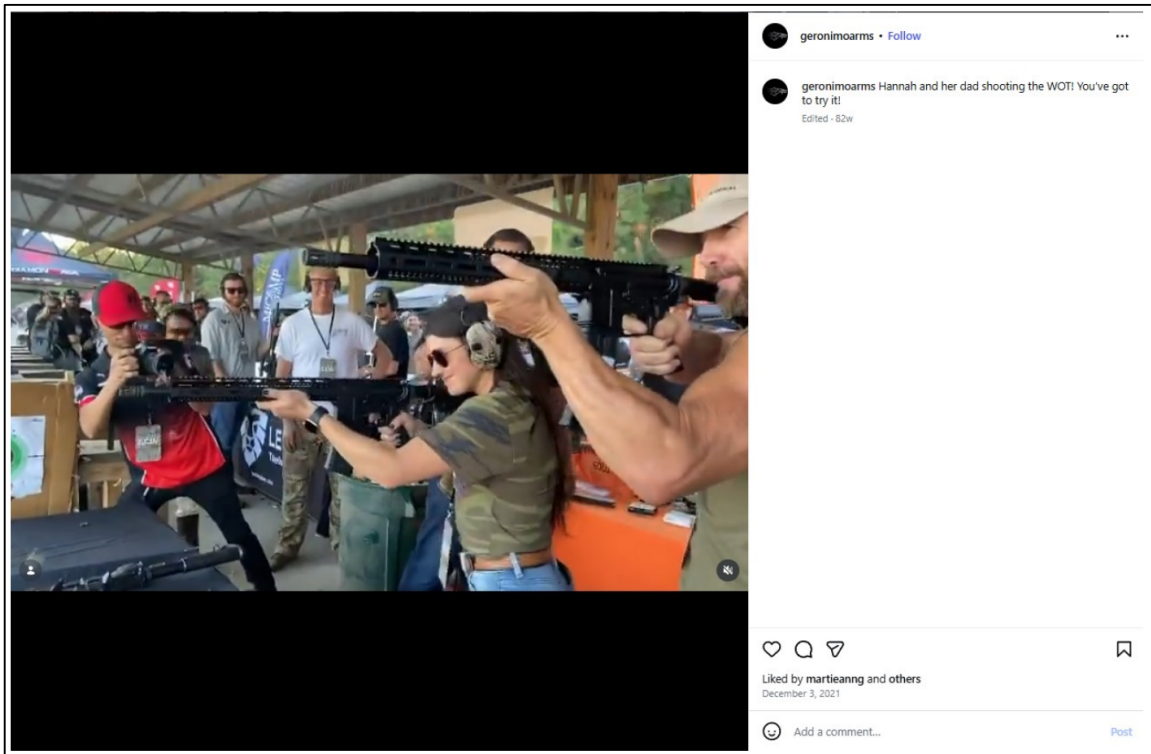
22. On information and belief, Defendants previously or are currently making, using, selling, and/or offering for sale the WOT via the website <https://www.geronimoarms.com/>, in multiple variants, including at least:

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

23. Exemplary images are shown below:







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

25. When the WOT operates in the “forced reset” mode, the cycling of the action causes hammer contact with the trigger member to mechanically reset the hammer and trigger member. A locking bar/member prevents the trigger member from being pulled again by the user until the bolt carrier has returned to the in-battery position.

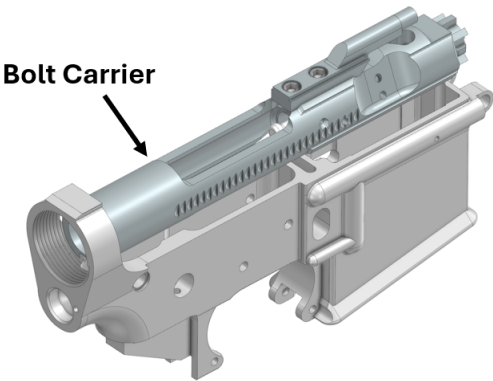
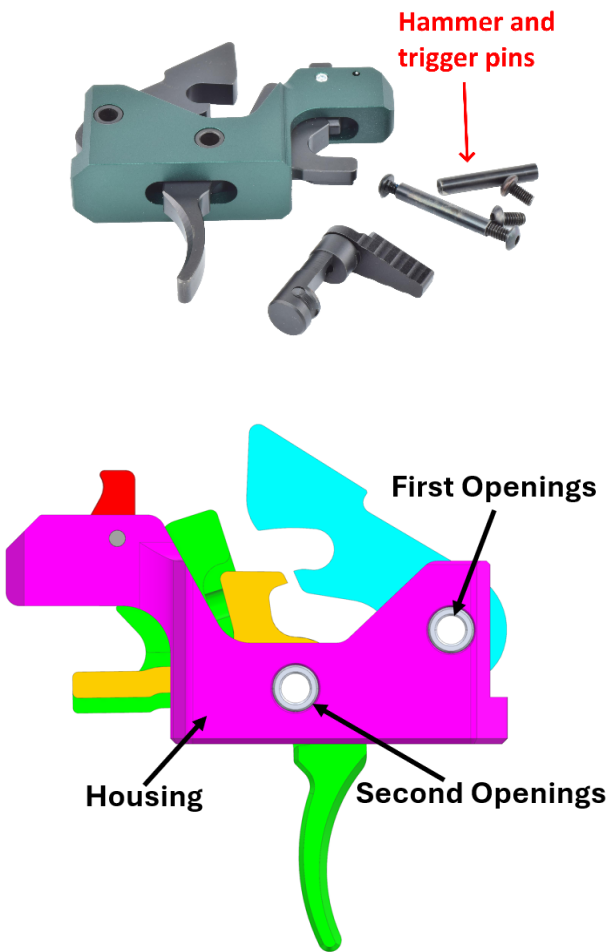
26. When in the standard semi-automatic mode, rearward movement of the bolt carrier causes rearward pivoting of the hammer such that the disconnecter hook catches the hammer hook, at which time a user must manually reduce pressure on the trigger member to free the hammer from the disconnecter to permit the hammer and trigger member to pivot to the set positions so that the user can pull the trigger member to fire the firearm again.

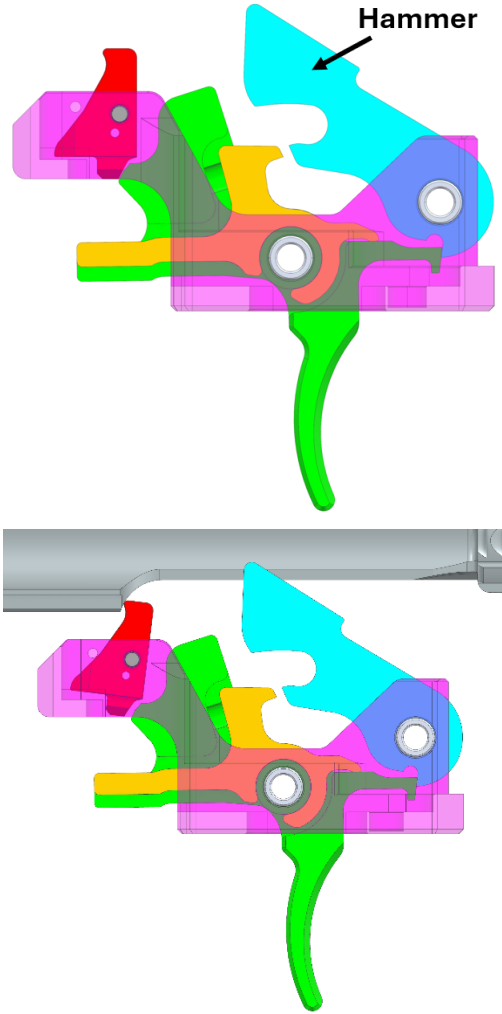
27. When in the “forced reset” semi-automatic mode, rearward movement of the bolt carrier causes rearward pivoting of the hammer causing the trigger member to be mechanically moved to the set position, the safety selector preventing the disconnecter hook from catching the hammer hook, and thereafter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

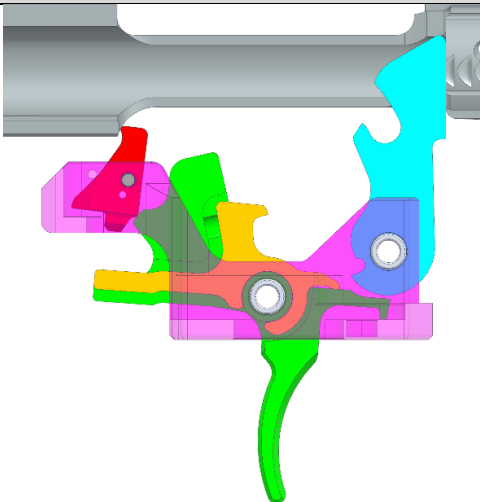
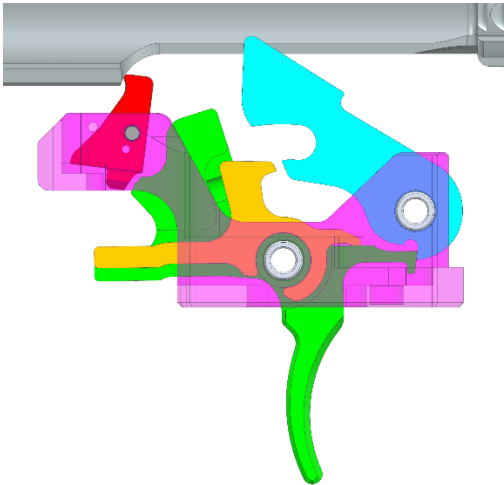
COUNT I — INFRINGEMENT OF THE '223 PATENT

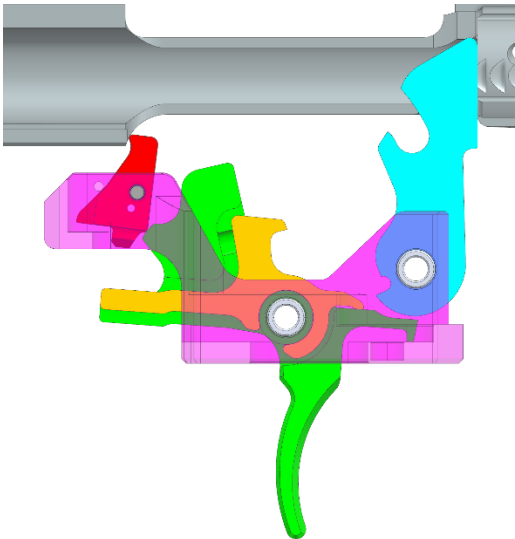
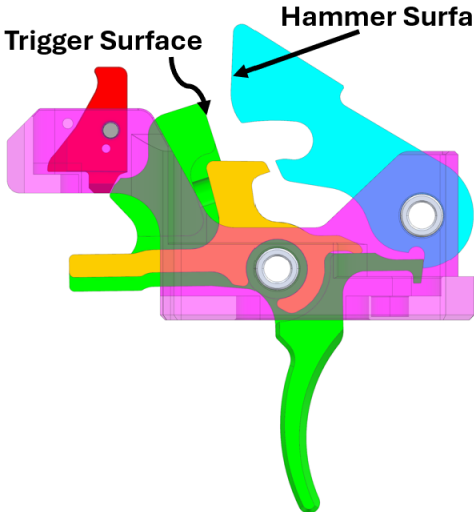
28. Plaintiffs re-allege and incorporate the allegations of the preceding paragraphs as if fully set forth herein.

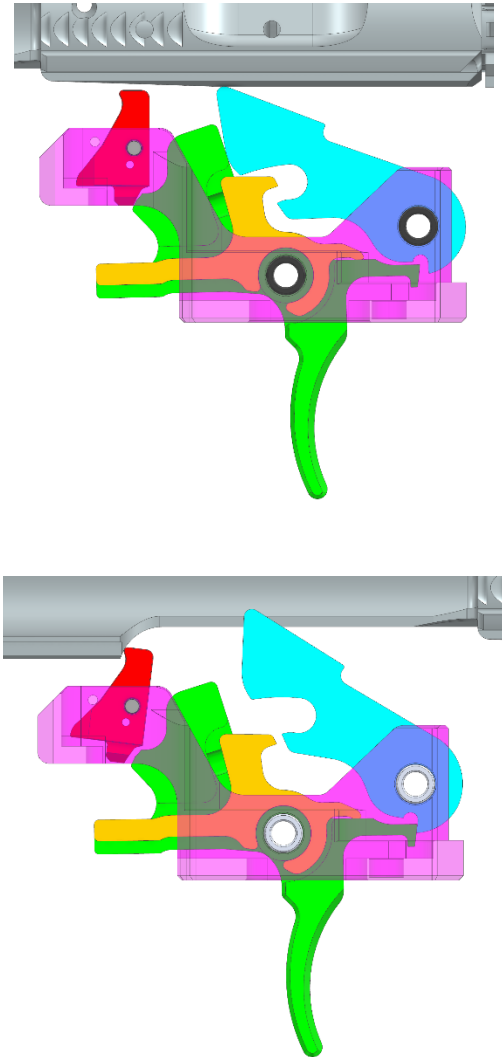
29. In violation of 35 U.S.C. § 271, Defendants have infringed, induced others to infringe, and/or contributed to the infringement of one or more claims of the '223 Patent, including but not limited to claim 4, literally and/or under the doctrine of equivalents, by among other things,

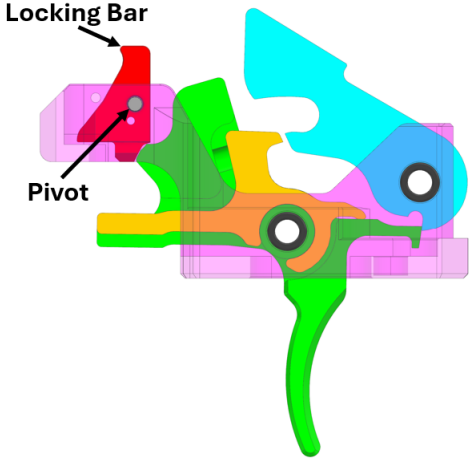
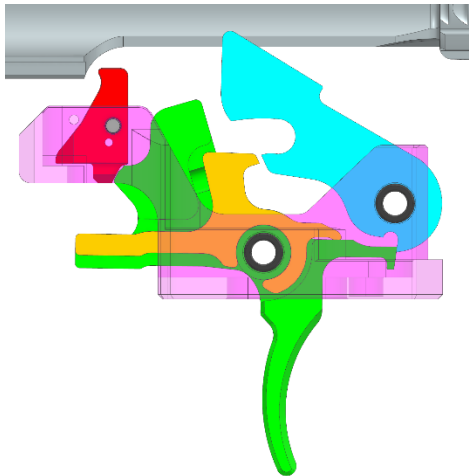
'223 Patent, Claim 4	The WOT
	
a housing having transversely aligned pairs of openings for receiving hammer and trigger assembly pins;	The WOT includes a housing with transversely aligned pairs of openings for receiving hammer and trigger assembly pins.  (Plaintiff-generated renderings of the WOT here and below)

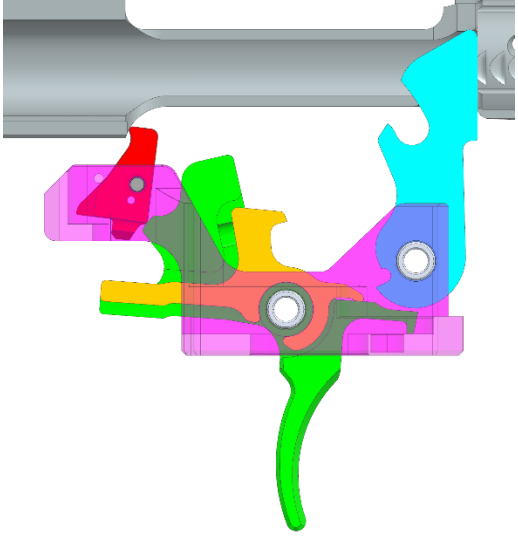
'223 Patent, Claim 4	The WOT
a hammer having a sear notch and mounted in the housing to pivot on a transverse axis between set and	The WOT includes a hammer (blue) with a sear notch and is mounted in the housing to pivot on a transverse axis.  Hammer Set Position

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

'223 Patent, Claim 4	The WOT
and released positions,	 Released Position
the trigger member having a surface positioned to be contacted by the hammer when the hammer is displaced by the bolt carrier when cycled,	The trigger member (green) has a surface positioned to be contacted by a surface of the hammer (blue)  Trigger Surface Hammer Surface
the contact causing the trigger member to be forced to the set position;	The hammer (blue) pivots rearward causing the trigger (green) to be mechanically moved to the set position.

'223 Patent, Claim 4	The WOT
	
a locking bar pivotally mounted in the housing	The WOT includes a locking bar (functionally represented here in red) that is pivotally mounted in the housing.

'223 Patent, Claim 4	The WOT
	
and spring biased toward a first position in which the locking bar mechanically blocks the trigger member from moving to the released position, and movable against the spring bias to a second position when contacted by the bolt carrier reaching a substantially in-battery position in which the trigger member can be moved by an external force to the released position.	The locking bar is spring biased toward a first position in which the locking bar mechanically blocks the trigger member from moving to the released position.  First position Mechanically Blocked The locking bar is movable against the spring bias to a second position when contacted by the bolt carrier reaching a substantially in-battery position. In this position, the trigger member can be moved by an external force (pull by the trigger finger) to the released position.

'223 Patent, Claim 4	The WOT
	

32. On information and belief, in addition to direct infringement, Defendants take active steps to induce others, including their customers, to directly infringe the '223 Patent. Defendants take such active steps knowing that those steps will induce, encourage, and facilitate direct infringement by others. Such active steps include, but are not limited to, encouraging, advertising, promoting, and instructing others to use and/or how to use the WOT while selling products.

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

34. On information and belief, Defendants also contribute to the infringement of the '223 Patent by others, including their customers. Acts by Defendants that contribute to the infringement of others include, but are not limited to, the sale, offer for sale, and/or importation by Defendants of the components of the WOT, such as the trigger assembly. The components are not suitable for substantial noninfringing use as they are specially designed and adapted to be used in a fire control unit to mechanically reset a trigger mechanism and infringe the '223 Patent.

35. Defendants have engaged in egregious infringement behavior with knowledge of the '223 Patent, which has been duly issued by the USPTO, and is presumed valid. On information and belief, Defendants have known or should have known that their actions constituted and continue to constitute infringement of the '223 Patent and that the '223 Patent is valid at least through the service of this complaint. Defendants could not reasonably or subjectively believe that their actions do not constitute infringement of the '223 Patent, nor could they reasonably or subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants have continued their infringing activities. As such, Defendants willfully infringe the '223 Patent.

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

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

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

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

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

41. 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 Patent has been and continues to be infringed by Defendants;
- b. Defendants' infringement of each of the Asserted Patent has been, and continues to be, willful;
- c. Each of the Asserted Patent 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 Patent 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 Patent; 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 Patent 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/ Glenn D. Bellamy

Glenn D. Bellamy

WOOD HERRON & EVANS LLP

600 Vine Street, Suite 2800

Cincinnati OH 45202

E-mail: gbellamy@whe-law.com

Tel: (513) 707-0243

Fax: (513) 241-6234

Matthew A. Colvin (Pro Hac Vice forthcoming)

Texas Bar No. 24087331

FISH & RICHARDSON P.C.

1717 Main Street, Suite 5000

Dallas, TX 75201

E-mail: colvin@fr.com

Tel: (214) 747-5070

Fax: (214) 747-2091

Attorneys for Plaintiffs

ABC IP, LLC and Rare Breed Triggers, Inc