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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RAVIN CROSSBOWS, LLC, Plaintiff, v. HUNTER'S MANUFACTURING COMPANY, INC. d/b/a TENPOINT CROSSBOW TECHNOLOGIES, Defendant.	Case No. 2:21-cv-02213 **COMPLAINT** **JURY DEMAND**

COMPLAINT WITH DEMAND FOR JURY TRIAL

Plaintiff Ravin Crossbows, LLC ("Ravin") by and for its Complaint for Patent Infringement against Defendant Hunter's Manufacturing Company, Inc., d/b/a TenPoint Crossbow Technologies ("TenPoint" or "Defendant"), alleges to the Court as follows:

PARTIES

1. Ravin is a Wisconsin limited liability company with its principal place of business in Superior, Wisconsin. Ravin is in the business of designing, developing, manufacturing, marketing, and selling crossbows and crossbow products for recreational, hunting, and archery-related activities. As of December 17, 2021, Ravin's sole member is Velocity Outdoor Inc., a Delaware corporation with its principal place of business in New York.

2. Ravin is informed and believes that TenPoint is a Nevada corporation with its principal place of business in Mogadore, Ohio. TenPoint is also in the business of manufacturing and selling crossbows and is Ravin's primary competitor for market share in the crossbow products space.

JURISDICTION AND VENUE

3. This is an action for patent infringement arising out of at least Defendant's unauthorized importing, manufacturing, offering for sale, and selling of compound bows and archery-related accessories in violation of Ravin's patent rights. Because this action arises under the patent laws of the United States, 35 U.S.C. § 271, *et seq.*, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over TenPoint because TenPoint is incorporated in this District. Furthermore, upon information and belief, TenPoint regularly transacts business in the State of Nevada and has committed acts of infringement in this District by offering for sale and selling infringing products within this District. Upon information and belief, TenPoint sells their products through no less than three retailers located within this District, including Bass Pro Shop in Las Vegas, Nevada; Scheels in Sparks, Nevada, and Cabela's in Verdi, Nevada (U.S. Dealers, TenPoint, https://www.tenpointcrossbows.com/dealers/ (last visited

December 12, 2021)).

5. Venue is proper in the District of Nevada pursuant to 28 U.S.C. §§ 1391 and 1400 because TenPoint is incorporated under the laws of Nevada in this District, and therefore resides in this District. Further, TenPoint has committed acts of infringement within this District.

PATENTS-IN-SUIT

6. On May 31, 2016, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,354,015 ("the '015 Patent"), titled "String Guide System for a Bow." A true and accurate copy of the '015 Patent is attached hereto as Exhibit 1. Ravin is the assignee of the '015 Patent.

7. On November 15, 2016, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,494,379 ("the '379 Patent"), titled "Crossbow." On November 8, 2018, and as amended on December 26, 2018, Ravin filled a Request for Certificate of Correction Pursuant to 37 C.F.R. § 1.323 with the U.S. Patent and Trademark Office to correct minor typographical and clerical errors. Ravin proposed, and the U.S. Patent and Trademark Office adopted, certain corrections, which are not subject to reasonable debate based on consideration of the claim language, the specification, and the prosecution history. These corrections neither constitute new matter nor require reexamination. The Certificate of Correction issued on January 1, 2019. Because this Certificate of Correction issued with a typographical error relating to the location of the corrections, on January 16, 2019, Ravin filed a Request for Superseding Certificate of Correction, which was issued on May 14, 2019. A true and accurate copy of the '379 Patent, including the original and superseding Certificates of Correction, is attached hereto as Exhibit 2. Ravin is the assignee of the '379 Patent.

8. On January 30, 2018, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 9,879,936 ("the '936 Patent"), titled "String Guide for a Bow." On November 8, 2018, Ravin filled a Request for Certificate of Correction Pursuant to 37 C.F.R. § 1.323 with the U.S. Patent and Trademark Office to correct minor typographical and clerical errors. Ravin proposed, and the U.S. Patent and Trademark Office adopted, certain corrections, which are not

subject to reasonable debate based on consideration of the claim language, the specification, and the prosecution history. These corrections neither constitute new matter nor require reexamination. The Certificate of Correction issued on December 11, 2018. Because this Certificate of Correction issued with a typographical error relating to the location of the corrections, on February 20, 2019, Ravin filed a Request for Superseding Certificate of Correction, which was issued on April 30, 2019. A true and accurate copy of the ’936 Patent, including the original and superseding Certificates of Correction, is attached hereto as Exhibit 3. Ravin is the assignee of the ’936 Patent.

9. On April 9, 2019, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 10,254,073 (“the ’073 Patent”), titled “Crossbow.” A true and accurate copy of the ’073 Patent is attached hereto as Exhibit 4. Ravin is the assignee of the ’073 Patent.

10. On July 14, 2020, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 10,712,118 (“the ’118 Patent”), titled “Crossbow.” A true and accurate copy of the ’118 Patent is attached hereto as Exhibit 5. Ravin is the assignee of the ’118 Patent.

11. On August 10, 2021, the U.S. Patent and Trademark Office duly and legally issued U.S. Patent No. 11,085,728 (“the ’728 Patent”), titled “Crossbow with Cabling System.” On October 4, 2021, Ravin filled a Request for Certificate of Correction Pursuant to 37 C.F.R. § 1.323 with the U.S. Patent and Trademark Office to correct minor typographical and clerical errors. Ravin proposed, and the U.S. Patent and Trademark Office adopted, certain corrections, which are not subject to reasonable debate based on consideration of the claim language, the specification, and the prosecution history. These corrections neither constitute new matter nor require reexamination. The Certificate of Correction issued on November 23, 2021. A true and accurate copy of the ’728 Patent, including the Certificate of Correction, is attached hereto as Exhibit 6. Ravin is the assignee of the ’728 Patent.

BACKGROUND

RAVIN'S PATENTED CROSSBOWS

12. Ravin entered the crossbow market in late 2016 as an innovative alternative to established manufacturers. Ravin's first crossbow—the R9™—was instantly recognized as revolutionary, in large part due to its patented HeliCoil® technology. Ravin followed up this success with the launch of the R15™ crossbow, which quickly received Outdoor Life's "Editor's Choice" award for the best new crossbow in 2017, based on its ease of use, speed, and accuracy. The R9™ and R15™ accumulated many other awards, including the 2018 National Rifle Association Golden Bullseye Award as the "Bow of the Year" and the Field and Stream Best of the Best Outdoor Gear 2017 Best Bow award, respectively. (Ex. 13, pp. 1-2 (Editorial, 2018 Bow of the Year: Ravin R9 Crossbow, NRA AM. HUNTER (Apr. 30, 2018), https://www.americanhunter.org/articles/2018/4/30/2018-bow-of-the-year-ravin-r9-crossbow/); Ex. 14, pp. 4-5 (Editorial, Best of the Best Outdoor Gear 2017, FIELD & STREAM (Nov. 14, 2017), https://www.fieldandstream.com/2017-best-of-the-best-outdoor-gear).)

13. Today, Ravin's crossbows continue to break barriers and redefine the industry using Ravin's patented HeliCoil® technology. For example, in 2020, Ravin's R29X crossbow became the first crossbow to be operable at 200 yards. (Ex. 15, pp. 1-5 (Editorial, First Ever 200 Yard Crossbow – Ravin Crossbows, KIIGNS (Aug. 31, 2020), https://kiigns.com/blogs/news/first-ever-200-yard-crossbow).) In 2021, Ravin's R500 series crossbow became the first crossbow to fire at a velocity of 500 feet per second (fps). (Ex. 16, p. 2 (Mark Demko, First to 500: New Ravin Lineup Sets Crossbow Speed Mark, BOWHUNTING MAGAZINE (Jan. 13, 2021), https://www.bowhuntingmag.com/editorial/first-to-500-new-ravin-lineup-sets-crossbow-speed-mark/387551).) Ravin's engineers have consistently innovated to establish new upper limits for crossbow speed and distance that are unmatched in the industry.

14. Ravin's increasing arrow speeds and longer operating distances are achieved using Ravin's patented HeliCoil™ technology, which has provided a significant improvement over traditional compound crossbows. Traditional compound crossbows, such as the one shown in

Figure 3 of the ’379 Patent reproduced below, operate by connecting the draw string (blue) to rotating cams (purple) that are positioned at the end of the crossbow’s limbs (not shown). Power cables (red) also attach to the rotating cams and are designed to wind in an opposite direction to the bow string. As the draw string is drawn to load the crossbow, the draw string unwinds from draw string journals on the rotating cams. The power cables simultaneously wrap around power cable journals on the cams and deflect the bow limbs, thereby storing energy as the draw string is pulled. When the crossbow is fired, the bow limbs and power cables force the cams to rotate in an opposite direction, which re-wraps the draw string into the draw string journals and adds additional force on the arrow. Potential interference between the portion of the power cables extending between the cams and the raised attachment points (green) that secure the power cables to the cams limit the rotation of the cams. Limits on cam rotation limit the length of the power stroke for the draw string, which reduces the amount of energy storage capacity and arrow speed that can be provided by the crossbow.

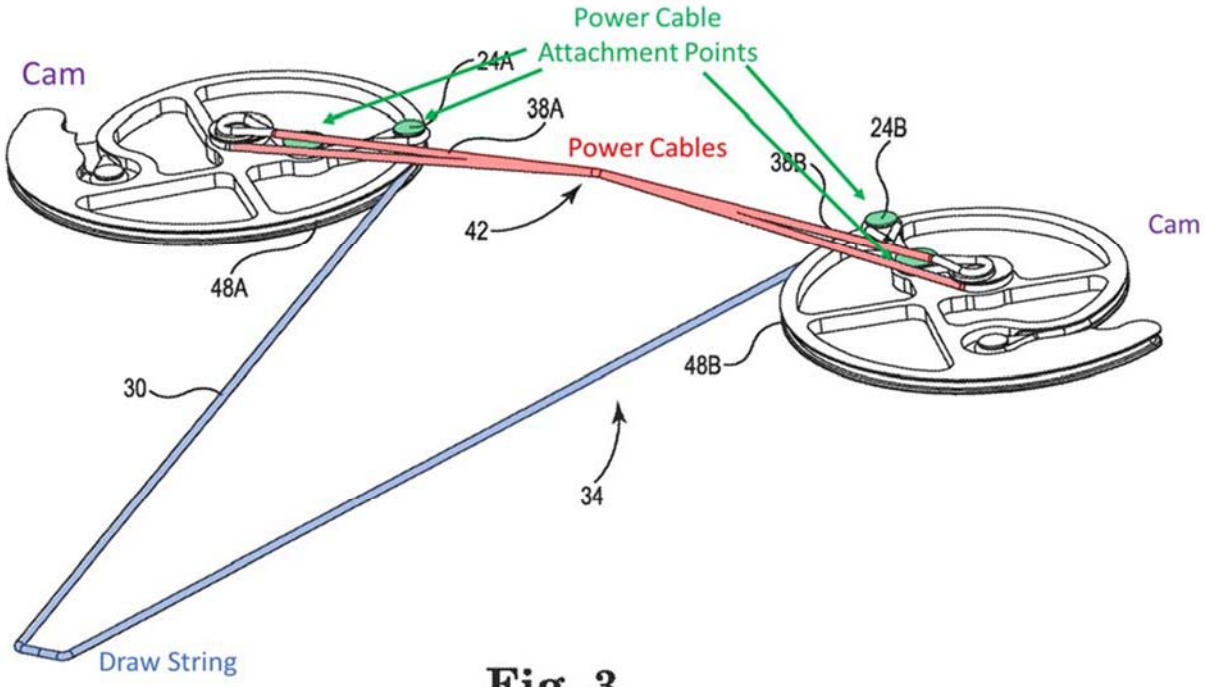


Fig. 3
PRIOR ART

(Ex. 2, p. 4 (’379 Patent at Fig. 3 (annotated)).)

15. The solutions in the ’015 Patent, the ’379 Patent, the ’936 Patent, the ’073 Patent, the ’118 Patent, and the ’728 Patent (collectively, the “Patents-in-Suit”) solve this problem in part using helical power cable journals, an example of which is shown in Figure 7 of the ’379 Patent reproduced below. As the draw string (blue) is drawn, the power cables (red) wrap helically upward, like a coiled spring, around the power cable journals (yellow). This configuration displaces a portion of the power cables vertically away from the cams and allows the raised attachment points (green) on the cams to pass under (for the upper power cable) or above (for the lower power cable, shown in Figure 24C of the ’379 Patent reproduced below) the power cables, which in turn allows the cams to rotate more than 270 degrees. This configuration allows for a longer power stroke and greater energy storage in the limbs, resulting in higher arrow speeds. The symmetrical orientation of the upper and lower power cables also dramatically reduces deflection of the cams (*i.e.*, “cam lean”) compared to traditional crossbows having only lower power cables, which greatly improves long-range accuracy relative to conventional crossbows.

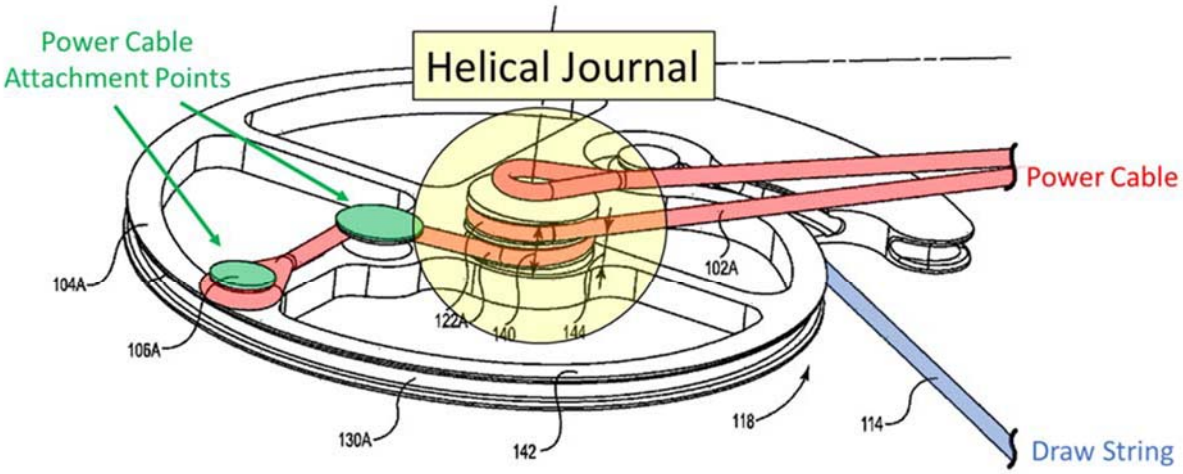


Fig. 7

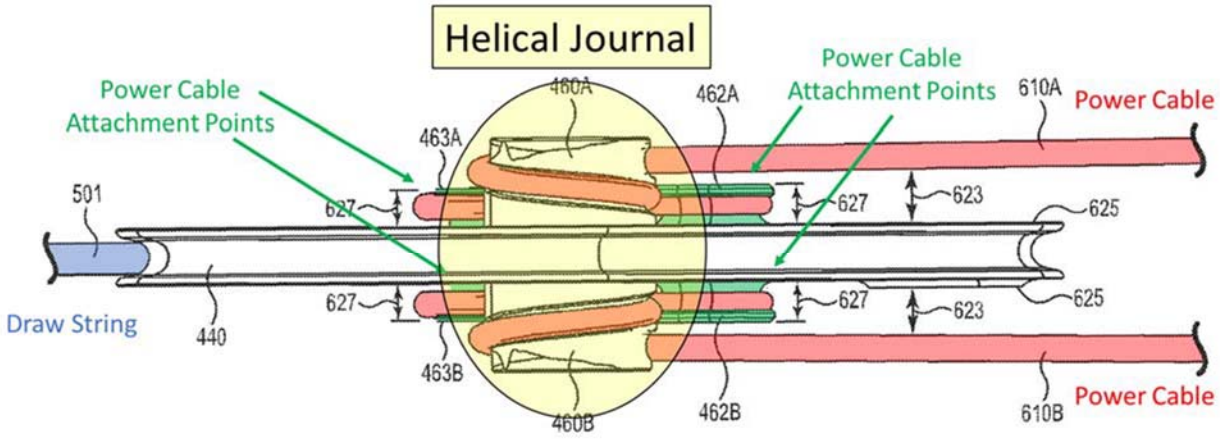
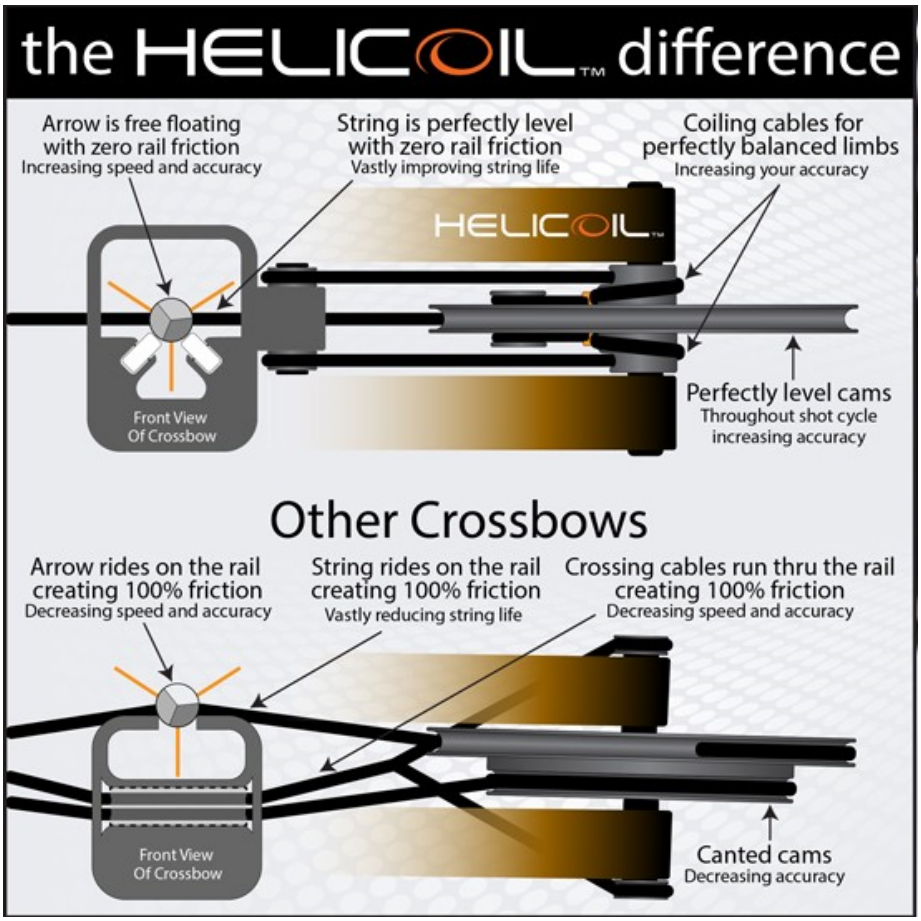


Fig. 24C

(*Id.* at pp. 7, 43 (annotated)).)



(Ex. 17, p. 4 (Ravin Crossbows, https://ravincrossbows.com/home-3/ (last visited August 13, 2021)).)

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16. HeliCoil® technology is implemented on nearly all of Ravin's crossbows. Ravin's HeliCoil® technology has allowed its crossbows to achieve superior performance compared with TenPoint's crossbows. For example, when Ravin's R15™ crossbow was released, it weighed less than 8 pounds and was rated for firing arrows with a speed of 434 fps. (Ex. 14, pp. 4-5 (Editorial, Best of the Best Outdoor Gear 2017, FIELD & STREAM (Nov. 14, 2017), https://www.fieldandstream.com/2017-best-of-the-best-outdoor-gear).) This was accomplished with an axle-to-axle width of only 6 inches when cocked. (*Id.*) In contrast, TenPoint's Carbon Nitro RDX™ crossbow – TenPoint's most expensive crossbow on the market when the R15™ was released – was rated only for 385 fps with an axle-to-axle width of 10 inches at a similar weight. (Ex. 18 (TenPoint Crossbow Comparison, TenPoint Crossbows, https://web.archive.org/web/20180408181422/https://www.tenpointcrossbows.com/compare-crossbows/ (last visited December 12, 2021)).) As a result, Ravin's ability to offer superior crossbow performance has allowed Ravin to gain significant market share from TenPoint since entering the market.

17. Ravin's innovations, including its HeliCoil® technology, have been recognized by the U.S. Patent and Trademark Office as evidenced by the Patents-in-Suit, in addition to several additional U.S. Patents not asserted in this action.

18. Ravin's website provides a list of issued patents and pending patent applications that are associated with Ravin's products. One or more of the Patents-in-Suit have been listed herein at least as early as August 22, 2017. (Ex. 19 (Patents and Patents Pending, Ravin Crossbows, https://ravincrossbows.com/patents/ (last visited December 16, 2021)).)

19. Ravin's success depends in part on its ability to continuously protect the inventions that it has developed and patented, including the innovations claimed in the Patents-in-Suit.

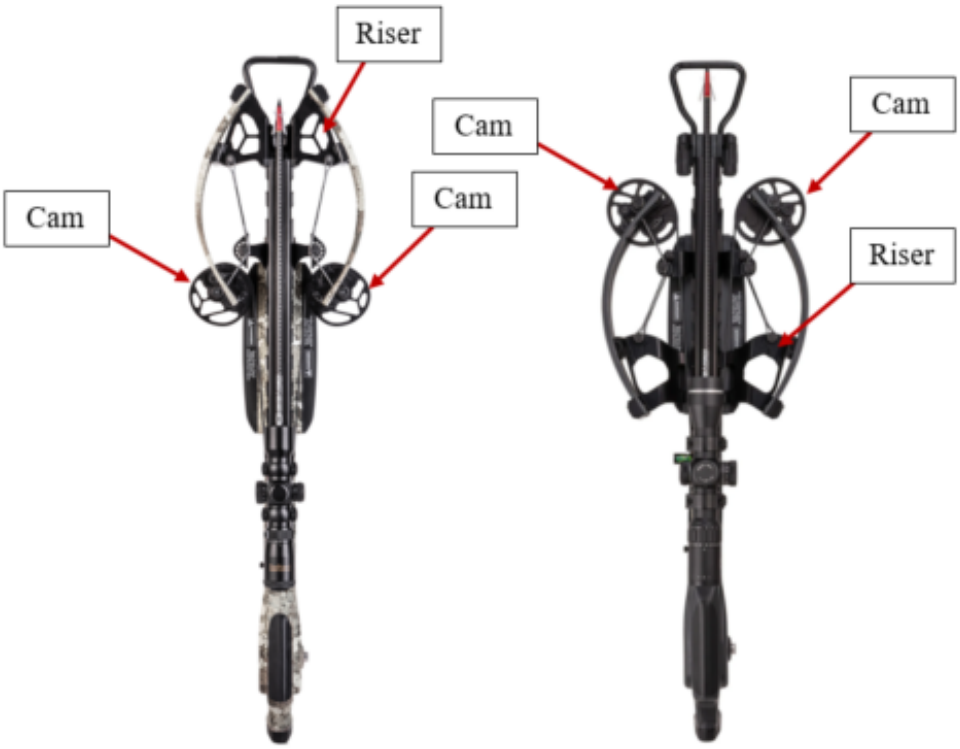
DEFENDANT TENPOINT'S INFRINGING PRODUCTS

20. TenPoint has used and continues to use Ravin's patented inventions in TenPoint products without the permission of Ravin. Without license, TenPoint has used Ravin's inventions to improve the performance of TenPoint's products and has relied on Ravin's inventions in its

promotional and marketing materials to sell its products.

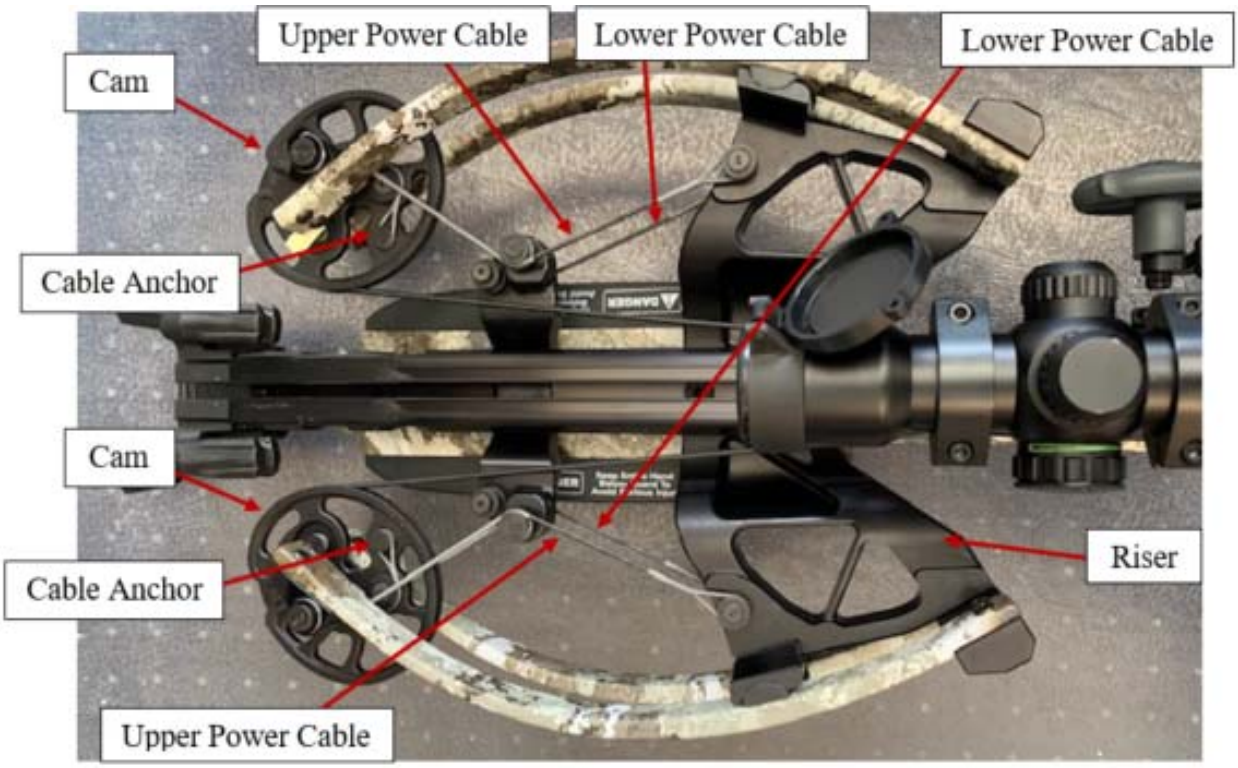
21. TenPoint imports, manufactures, sells, and offers for sale in the United States infringing crossbows including at least the Nitro 505 Xero, Nitro 505 Oracle X, Nitro 505, Vapor RS470 Xero, Vapor RS470, Havoc RS440 Xero, Havoc RS440, Vengent S440, Siege RS410, Viper S400 Oracle X, Viper S400, Wicked Ridge NXT 400, NXT 400, Turbo S1, Stealth NXT, Shadow NXT, Nitro XRT, Nitro X, and XR-410 (collectively, the "Infringing Crossbows"). TenPoint's development of the Infringing Crossbows was a direct response to the release of Ravin's revolutionary R9™ and R15™ crossbows. On information and belief, TenPoint does not offer a single crossbow model under its brands that can exceed 400 fps without the use of Ravin's patented HeliCoil® technology.

22. More specifically, the Infringing Crossbows each include flexible limbs that are secured to a riser that extends away from a barrel. The flexible limbs are arranged into two pairs, and each pair of flexible limbs supports a cam. Each cam is secured between a pair of flexible limbs using an axle that extends between the two flexible limbs. The cams rotate about the axle when the draw string, which is secured to each of the cams, is drawn. (Ex. 20 (Crossbows, TenPoint, https://www.tenpointcrossbows.com/product-category/crossbows/ (last visited December 12, 2021)).)

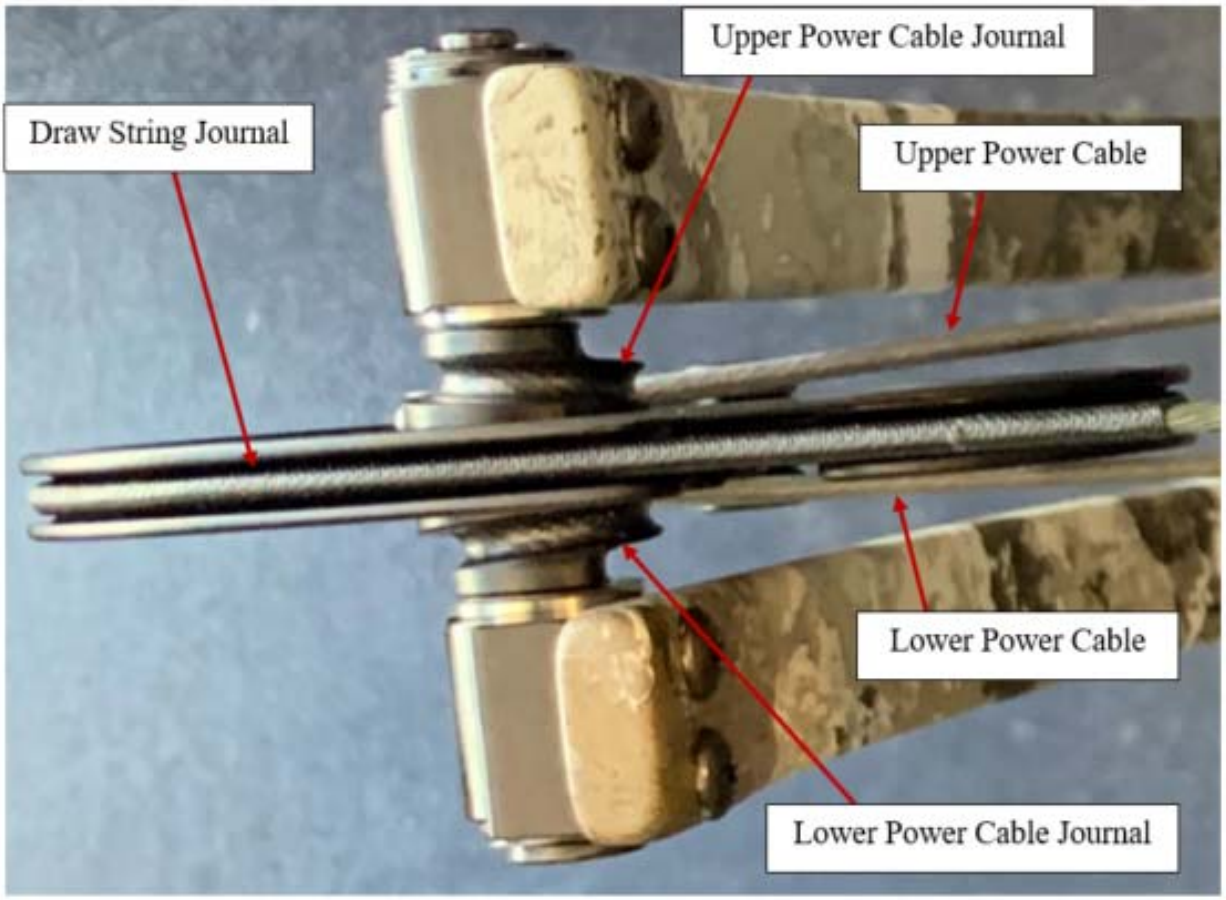


The Infringing Crossbows include both forward draw crossbows and reverse draw crossbows. Forward draw crossbows, such as the TenPoint Vengent S440 crossbow (shown left), have cams that are mounted to the flexible limbs behind the riser. Reverse draw crossbows, such as the Vapor RS470 crossbow (shown right) include cams that are mounted to the flexible limbs in front of the riser. (Ex. 21 (Vengent S440, TenPoint, https://www.tenpointcrossbows.com /product/vengent-s440/ (last visited December 12, 2021) (annotated)), Ex. 22 (Vapor RS470, TenPoint, https://www.tenpointcrossbows.com/product/vapor-rs470/ (last visited December 12, 2021) (annotated)).)

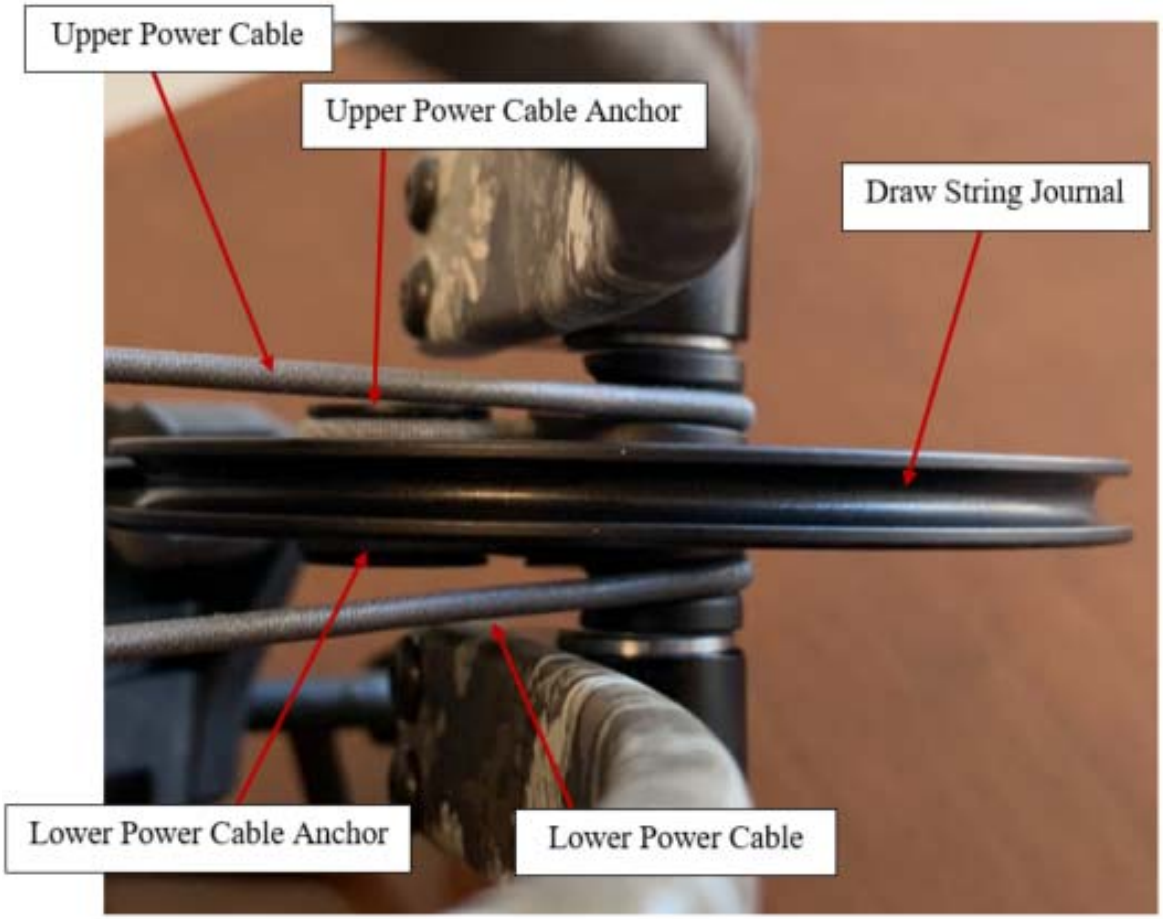
23. Each of the Infringing Crossbows include TenPoint's "Vector Quad Cable Technology," which utilizes Ravin's patented HeliCoil® system. For example, as depicted below in TenPoint's Siege RS410 Crossbow, TenPoint's "Vector Quad Cable Technology" includes four power cables. One end of each power cable is attached to a static terminal on the riser. The other end of each power cable is anchored to either the top or bottom of one of the cams.



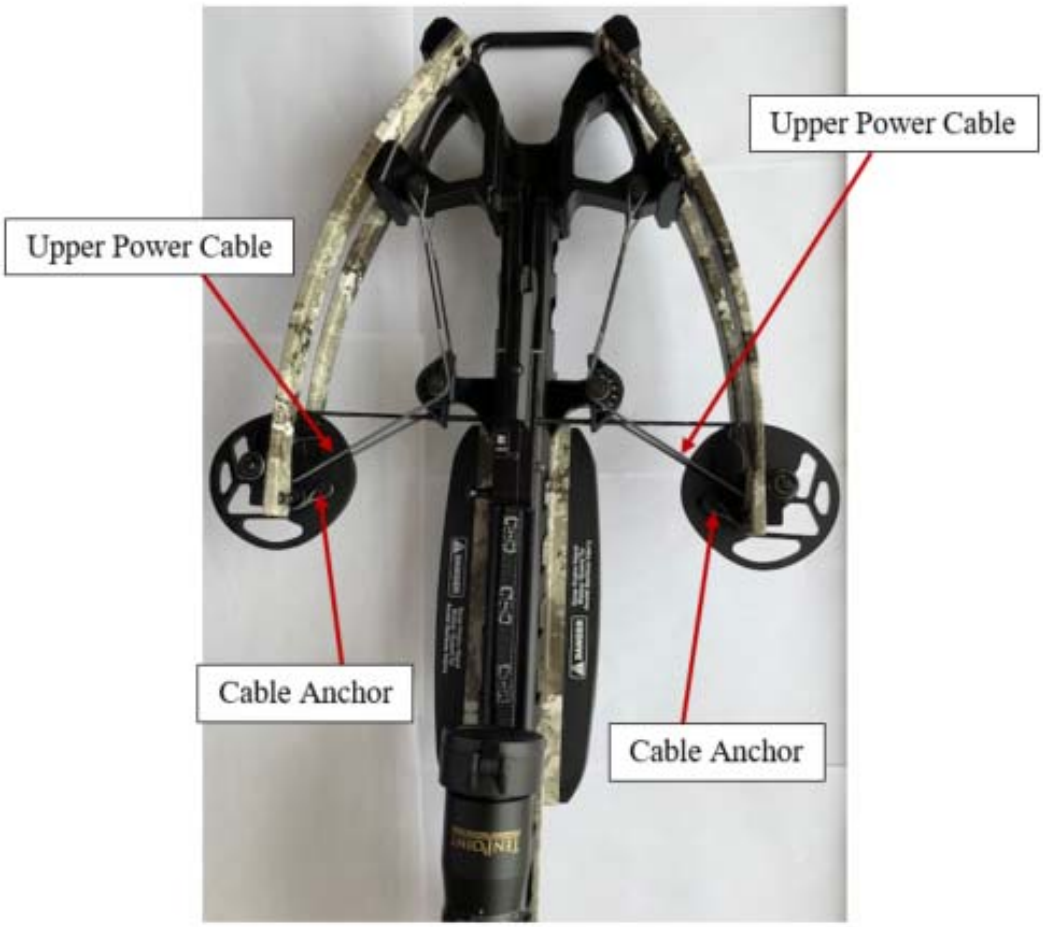
24. Each of the cams on the Infringing Crossbows are arranged so that when the draw string is drawn, each of the power cables are wound into helical power cable journals that are formed within each cam. The helical power cable journals wrap around the top and bottom of each cam and extend vertically away from the draw string journal. As depicted below in the TenPoint Siege RS410 Crossbow, each cam includes a helical power cable journal that displaces the power cables away from the draw string journal as power cable is wound into the respective helical power cable journals.



25. As the power cables wrap into the power cable journals, the power cables are displaced vertically away from the draw string journal. The vertical displacement of the power cables away from the draw string journal creates space between the power cables and the upper and lower surfaces of the cam. The spacing between the power cables and the upper and lower surfaces of the cam allows the power cable anchors to pass above (or beneath) the power cable, which allows each of the cams to rotate in excess of 270 degrees between the drawn and released positions.



26. For example, the TenPoint Vengent S440 crossbow is a forward draw crossbow. Upon information and belief, the Vengent is one of TenPoint's fastest-rated forward draw bows, advertising arrow speeds of up to 440 fps. The Vengent includes "Vector Quad Cable Technology," which enables an advertised cam rotation of 360 degrees. (Ex. 23, p. 2 (NEW TenPoint Vengent S440 Crossbow, YouTube, https://youtu.be/v0ncvTb_PdM (last visited December 12, 2021)).) The crossbow cocking process for the Vengent is depicted below.



(Vengent, released configuration.)

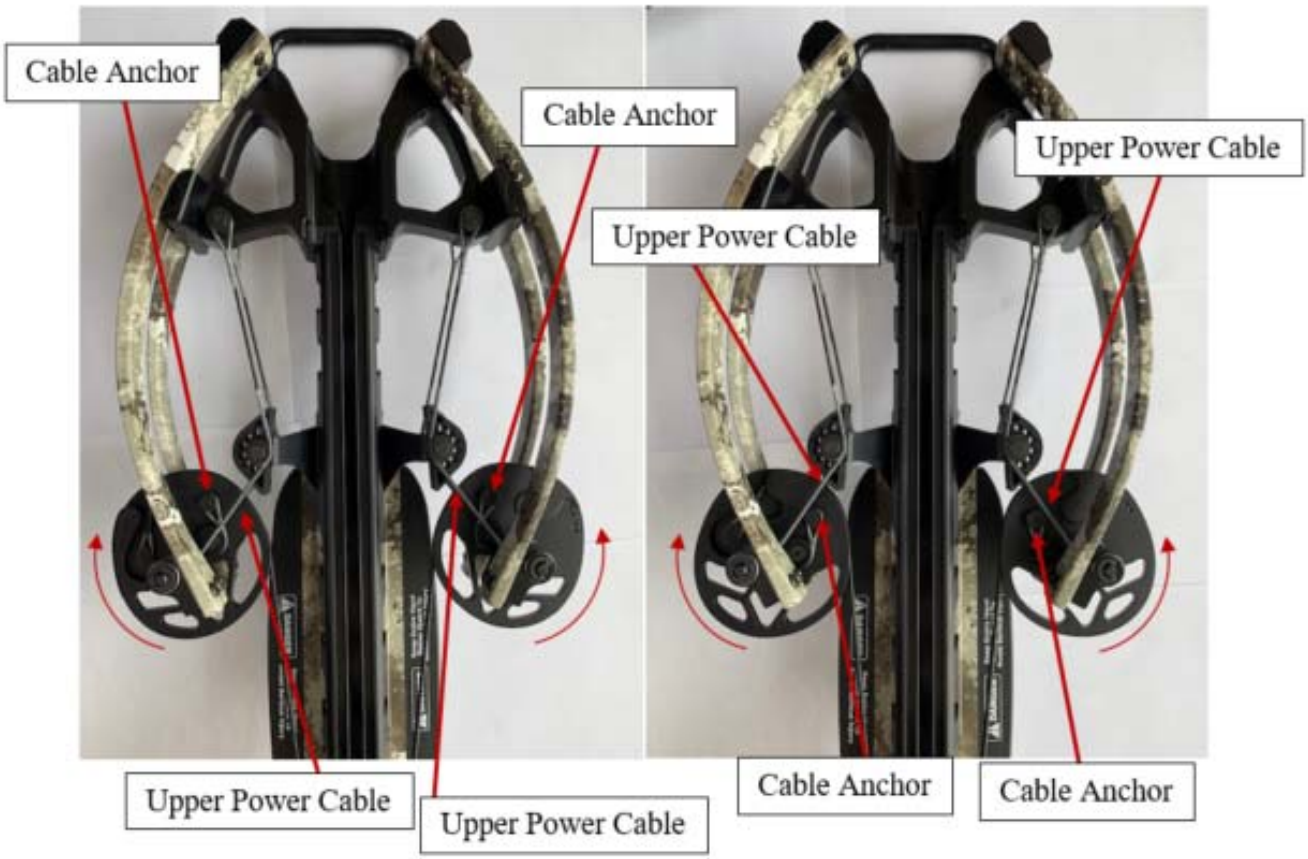
27. When the Vengent is in the released configuration (shown above), each of the power cable anchors are positioned behind the upper power cables. The upper power cables are not received within the helical power cable journals when the Vengent is in the released configuration.

(Vengent, partially drawn.)

28. As the draw string is drawn, the unwinding of the draw string from the draw string journals rotates each of the cams. Rotation of the cams, as depicted above, rotates the cable anchors that are formed on the cams. Rotation of the cams also wraps the upper and lower power cables into their respective helical power cable journals formed within the cams.

29. As the cams rotate and the upper power cables are wrapped into their respective helical power cable journals, the upper power cables are displaced away from the upper surface of the cam. The vertical spacing created between the upper surface of the cam and the upper power cables can then allow the cable anchors to pass or cross beneath the upper power cables, which allows additional rotation of the cams. Likewise, the lower power cables are displaced away from

the lower surface of the cam, such that cable anchors can pass or cross above the lower power cables.



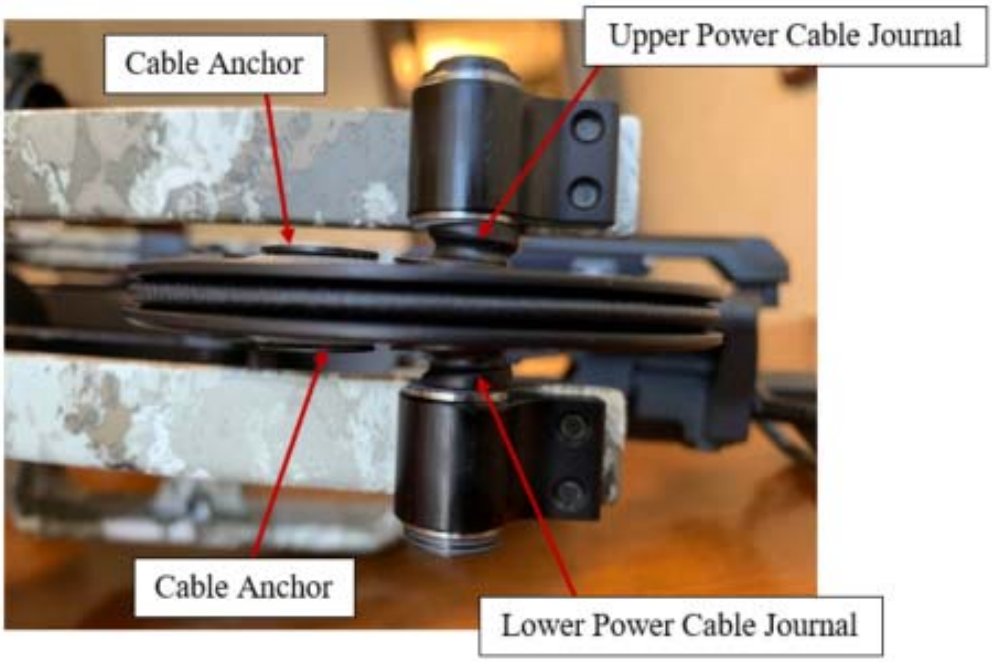
(Vengent, partially drawn (left) and Vengent, fully drawn (right).)

30. As the draw string of the Vengent transitions to the fully cocked and drawn position, the upper cable anchors pass beneath the upper power cables to complete a full 360 degree rotation. Similarly, the lower cable anchors pass above the lower power cables. The helical power cable journals enable the cable anchors to pass beneath the upper power cables and above the lower power cables, respectively. Without raising the upper power cables away from the upper surface of the cam and lowering the lower power cables away from the lower surface of the cam, which is accomplished using the helical power cable journals, the upper power cables and lower power cables would interfere with the cable anchors formed on the cams. This interference would limit

the rotation of the cam, which would in turn limit the length of the power stroke that can be used on the crossbow, which would in turn limit the amount of energy that can be stored within the crossbow. Reducing the amount of energy storage within the crossbow would reduce performance, including rated arrow speeds.

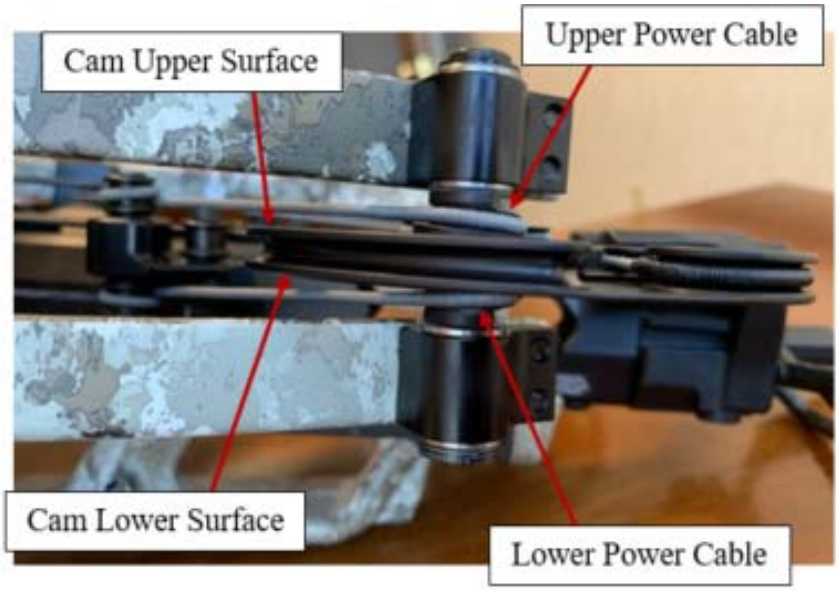
31. TenPoint's reverse draw crossbows also use "Vector Quad Cable Technology." The TenPoint Siege S410 crossbow is an exemplary reverse draw crossbow. The Siege has a listed maximum arrow speed of 410 fps. The Siege includes "Vector Quad Cable Technology," which "utilizes four independent cables to keep the cams perfectly level, leading to straight nock travel and precision down range accuracy." (Ex. 24, pp. 10-13 (TenPoint NEW Siege RS410 Crossbow Review, YouTube, https://youtu.be/_NDmU3AFEcU (last visited December 12, 2021)).)

32. As depicted below, each of the cams on the Siege include helical power cable journals that direct the power cables away from the upper and lower surfaces of the cam as the draw string is drawn. The helical power cable journal extends vertically away from one of the upper or lower surface of the cam to a height above or below the power cable anchors.



(Siege, in the fully-released position.)

33. When the draw string of the Siege is drawn, the upper and lower power cables are wound up into the upper and lower helical power cable journals, which displaces the upper and lower power cables away from the upper and lower surfaces of the cam.



(Siege, in the fully-drawn position.)

34. As the draw string of the Siege transitions to the fully cocked and drawn position, the power cables are displaced away from the upper and lower surfaces of the cam. The displacement of the power cables away from the upper and lower surfaces of the cam permits the cable anchors to pass beneath and above the upper and lower power cables, allowing additional rotation of the cams and additional energy storage as compared to conventional crossbows. Reverse draw crossbows, like the Siege, are configured to have a longer power stroke than forward draw crossbows, such that cam rotations greater than 270 degrees are advantageous. Different reverse draw crossbows within the Infringing Crossbows advertise cam rotations of as high as 404 degrees, which are only made possible using Ravin's patented HeliCoil® technology. (Ex. 25, p. 7 (NEW TenPoint Vapor RS470 Crossbow with 100-yard EVO-X Marksman Elite Scope, YouTube, https://youtu.be/SyZYhOvoBHg (last visited December 12, 2021)).)

35. On information and belief, TenPoint was aware of Ravin's patented HeliCoil® technology and one or more of the Patents-in-Suit when developing the Infringing Crossbows, at least due to its position as a licensing partner with Ravin on unrelated technology, its communications with Ravin's representatives, its access to information regarding Ravin's crossbows at trade shows and online, and Ravin's constructive notice and virtual patent marking of its crossbows.

36. On July 15, 2017, Ravin's representative sent an email to TenPoint's representative that included, as an attachment, a listing of patents that protected Ravin's crossbows, including, among others, at least two of the Patents-in-Suit. Additionally, on November 27, 2017, TenPoint's representative contacted Ravin's representative seeking a potential license to Ravin's helical cam patents, which correspond to Ravin's HeliCoil® technology.

37. Ravin did not grant and TenPoint did not receive nor does it have a license to any of Ravin's HeliCoil® technology, including the Patents-in-Suit.

38. On information and belief, TenPoint's "Vector Quad Cable Technology" willfully copied Ravin's patented HeliCoil® technology. TenPoint released the Infringing Crossbows with the "Vector Quad Cable Technology" only after Ravin's R9™ and R15™ were introduced and

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threatened TenPoint's market position and profitability. The striking similarities between the Infringing Crossbows and Ravin's groundbreaking HeliCoil® technology highlight that TenPoint designed the Infringing Crossbows – including the "Vector Quad Cable Technology" –specifically to incorporate Ravin's patented HeliCoil® technology, as claimed in the Patents-in-Suit. On information and belief, TenPoint's development of the Infringing Crossbows was deliberately calculated to undermine the commercial success of Ravin's R9™ and R15™ crossbows as well as Ravin's subsequent product offerings, which implement Ravin's patented HeliCoil™ technology.

39. On information and belief, TenPoint has never offered for sale or sold a crossbow that has been capable of producing speeds of greater than 400 fps without using "Vector Quad Cable Technology."

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 9,354,015

40. Ravin incorporates by reference paragraphs 1 – 39 as if fully set forth herein.

41. The '015 Patent is valid and enforceable.

42. TenPoint, directly or through the actions of its employees, divisions, and/or subsidiaries, has infringed and continues to infringe, either literally or under the doctrine of equivalents, at least one of the claims of the '015 Patent, including but not limited to claim 1, under 35 U.S.C. § 271(a) by, among other things, making, importing, using, offering for sale, and selling in the United States at least the following products: Nitro 505 Xero, Nitro 505 Oracle X, Nitro 505, Vapor RS470 Xero, Vapor RS470, Havoc RS440 Xero, Havoc RS440, Siege RS410, Nitro XRT, Nitro X, and XR-410.

43. Specifically, Exhibit 7 provides a representative example of how the TenPoint Siege and all other similarly configured bows meet each and every claim limitation of claim 1 of the '015 Patent. Upon information and belief, the infringing functionality of the Siege crossbow is representative of and substantially the same as the infringing functionality of each reverse draw crossbow within the Infringing Crossbows. This demonstration of infringement is offered by way of example only and without limitation to Ravin's ability to demonstrate Defendant's infringement

of additional claims of the ’015 Patent, including by making, importing, using, offering for sale, and selling additional products in the United States.

44. Ravin has been and continues to be damaged by Defendant’s infringement of the ’015 Patent. Ravin is entitled to recovery of monetary damages for such injuries pursuant to 35 U.S.C. § 284, in an amount to be determined at trial.

45. Defendant has committed the foregoing infringing activities without license from Ravin and, upon information and belief, with knowledge of the ’015 Patent.

46. Upon information and belief, Defendant knew of the ’015 Patent while committing the foregoing infringing acts, thereby willfully, wantonly, and deliberately infringing the ’015 Patent. Ravin’s damages should be trebled pursuant to 35 U.S.C. § 284 because of Defendant’s willful infringement of the ’015 Patent.

47. Upon information and belief, the acts of infringement by Defendant have been performed with the knowledge of the ’015 Patent and are willful, wanton, and deliberate, thus rendering this action “exceptional” within the meaning of 35 U.S.C. § 285 and entitling Ravin to its reasonable attorneys’ fees and litigation expenses.

48. If Defendant’s marketing and sales of the Infringing Crossbows are not enjoined, Ravin will suffer substantial and irreparable harm for which there is no remedy at law.

COUNT II

INFRINGEMENT OF U.S. PATENT NO. 9,494,379

49. Ravin incorporates by reference paragraphs 1 – 39 as if fully set forth herein.

50. The ’379 Patent is valid and enforceable.

51. TenPoint, directly or through the actions of its employees, divisions, and/or subsidiaries, has infringed and continues to infringe, either literally or under the doctrine of equivalents, at least one of the claims of the ’379 Patent, including but not limited to claim 1, under 35 U.S.C. § 271(a) by, among other things, making, importing, using, offering for sale, and selling in the United States the following products: Nitro 505 Xero, Nitro 505 Oracle X, Nitro 505, Vapor RS470 Xero, Vapor RS470, Havoc RS440 Xero, Havoc RS440, Vengent S440, Siege RS410,

Viper S400 Oracle X, Viper S400, Wicked Ridge NXT 400, NXT 400, Turbo S1, Stealth NXT, Shadow NXT, Nitro XRT, Nitro X, and XR-410.

52. Specifically, Exhibit 8 provides a representative example of how the TenPoint Vengent and all other similarly configured bows meet each and every claim limitation of claim 1 of the ’379 Patent. Upon information and belief, the infringing functionality of the Vengent crossbow is representative of and substantially the same as the infringing functionality of each forward draw and reverse draw crossbow within the Infringing Crossbows. This demonstration of infringement is offered by way of example only and without limitation to Ravin’s ability to demonstrate Defendant’s infringement of additional claims of the ’379 Patent, including by making, importing, using, offering for sale, and selling additional products in the United States.

53. Ravin has been and continues to be damaged by Defendant’s infringement of the ’379 Patent. Ravin is entitled to recovery of monetary damages for such injuries pursuant to 35 U.S.C. § 284, in an amount to be determined at trial.

54. Defendant has committed the foregoing infringing activities without license from Ravin and, upon information and belief, with knowledge of the ’379 Patent.

55. Upon information and belief, Defendant knew of the ’379 Patent while committing the foregoing infringing acts, thereby willfully, wantonly, and deliberately infringing the ’379 Patent. Ravin’s damages should be trebled pursuant to 35 U.S.C. § 284 because of Defendant’s willful infringement of the ’379 Patent.

56. Upon information and belief, the acts of infringement by Defendant have been performed with the knowledge of the ’379 Patent and are willful, wanton, and deliberate, thus rendering this action “exceptional” within the meaning of 35 U.S.C. § 285 and entitling Ravin to its reasonable attorneys’ fees and litigation expenses.

57. If Defendant’s marketing and sales of the Infringing Crossbows are not enjoined, Ravin will suffer substantial and irreparable harm for which there is no remedy at law.

COUNT III

INFRINGEMENT OF U.S. PATENT NO. 9,879,936

58. Ravin incorporates by reference paragraphs 1 – 39 as if fully set forth herein.

59. The ’936 Patent is valid and enforceable.

60. TenPoint, directly or through the actions of its employees, divisions, and/or subsidiaries, has infringed and continues to infringe, either literally or under the doctrine of equivalents, at least one of the claims of the ’936 Patent, including but not limited to claim 1, under 35 U.S.C. § 271(a) by, among other things, making, importing, using, offering for sale, and selling in the United States the following products: Nitro 505 Xero, Nitro 505 Oracle X, Nitro 505, Vapor RS470 Xero, Vapor RS470, Havoc RS440 Xero, Havoc RS440, Vengent S440, Siege RS410, Viper S400 Oracle X, Viper S400, Wicked Ridge NXT 400, NXT 400, Turbo S1, Stealth NXT, Shadow NXT, Nitro XRT, Nitro X, and XR-410.

61. Specifically, Exhibit 9 provides a representative example of how the TenPoint Vengent and all other similarly configured bows meet each and every claim limitation of claim 1 of the ’936 Patent. Upon information and belief, the infringing functionality of the Vengent crossbow is representative of and substantially the same as the infringing functionality of each forward draw and reverse draw crossbow within the Infringing Crossbows. This demonstration of infringement is offered by way of example only and without limitation to Ravin’s ability to demonstrate Defendant’s infringement of additional claims of the ’936 Patent, including by making, importing, using, offering for sale, and selling additional products in the United States.

62. Ravin has been and continues to be damaged by Defendant’s infringement of the ’936 Patent. Ravin is entitled to recovery of monetary damages for such injuries pursuant to 35 U.S.C. § 284, in an amount to be determined at trial.

63. Defendant has committed the foregoing infringing activities without license from Ravin and, upon information and belief, with knowledge of the ’936 Patent.

64. Upon information and belief, Defendant knew of the ’936 Patent while committing the foregoing infringing acts, thereby willfully, wantonly, and deliberately infringing the ’936 Patent. Ravin’s damages should be trebled pursuant to 35 U.S.C. § 284 because of Defendant’s willful infringement of the ’936 Patent.

65. Upon information and belief, the acts of infringement by Defendant have been performed with the knowledge of the ’936 Patent and are willful, wanton, and deliberate, thus rendering this action “exceptional” within the meaning of 35 U.S.C. § 285 and entitling Ravin to its reasonable attorneys’ fees and litigation expenses.

66. If Defendant’s marketing and sales of the Infringing Crossbows are not enjoined, Ravin will suffer substantial and irreparable harm for which there is no remedy at law.

COUNT IV

INFRINGEMENT OF U.S. PATENT NO. 10,254,073

67. Ravin incorporates by reference paragraphs 1 – 39 as if fully set forth herein.

68. The ’073 Patent is valid and enforceable.

69. TenPoint, directly or through the actions of its employees, divisions, and/or subsidiaries, has infringed and continues to infringe, either literally or under the doctrine of equivalents, at least one of the claims of the ’073 Patent, including but not limited to claim 1, under 35 U.S.C. § 271(a) by, among other things, making, importing, using, offering for sale, and selling in the United States the following products: Nitro 505 Xero, Nitro 505 Oracle X, Nitro 505, Vapor RS470 Xero, Vapor RS470, Havoc RS440 Xero, Havoc RS440, Siege RS410, Nitro XRT, Nitro X, and XR-410.

70. Specifically, Exhibit 10 provides a representative example of how the TenPoint Siege and all other similarly configured bows meet each and every claim limitation of claim 1 of the ’073 Patent. Upon information and belief, the infringing functionality of the Siege crossbow is representative of and substantially the same as the infringing functionality of each reverse draw crossbow within the Infringing Crossbows. This demonstration of infringement is offered by way of example only and without limitation to Ravin’s ability to demonstrate Defendant’s infringement

of additional claims of the ’073 Patent, including by making, importing, using, offering for sale, and selling additional products in the United States.

71. Ravin has been and continues to be damaged by Defendant’s infringement of the ’073 Patent. Ravin is entitled to recovery of monetary damages for such injuries pursuant to 35 U.S.C. § 284, in an amount to be determined at trial.

72. Defendant has committed the foregoing infringing activities without license from Ravin and, upon information and belief, with knowledge of the ’073 Patent.

73. Upon information and belief, Defendant knew of the ’073 Patent while committing the foregoing infringing acts, thereby willfully, wantonly, and deliberately infringing the ’073 Patent. Ravin’s damages should be trebled pursuant to 35 U.S.C. § 284 because of Defendant’s willful infringement of the ’073 Patent.

74. Upon information and belief, the acts of infringement by Defendant have been performed with the knowledge of the ’073 Patent and are willful, wanton, and deliberate, thus rendering this action “exceptional” within the meaning of 35 U.S.C. § 285 and entitling Ravin to its reasonable attorneys’ fees and litigation expenses.

75. If Defendant’s marketing and sales of the Infringing Crossbows are not enjoined, Ravin will suffer substantial and irreparable harm for which there is no remedy at law.

COUNT V

INFRINGEMENT OF U.S. PATENT NO. 10,712,118

76. Ravin incorporates by reference paragraphs 1 – 39 as if fully set forth herein.

77. The ’118 Patent is valid and enforceable.

78. TenPoint, directly or through the actions of its employees, divisions, and/or subsidiaries, has infringed and continues to infringe, either literally or under the doctrine of equivalents, at least one of the claims of the ’118 Patent, including but not limited to claim 1, under 35 U.S.C. § 271(a) by, among other things, making, importing, using, offering for sale, and selling in the United States the following products: Nitro 505 Xero, Nitro 505 Oracle X, Nitro 505, Vapor

RS470 Xero, Vapor RS470, Havoc RS440 Xero, Havoc RS440, Siege RS410, Nitro XRT, Nitro X, and XR-410.

79. Specifically, Exhibit 11 provides a representative example of how the TenPoint Siege and all other similarly configured bows meet each and every claim limitation of claim 1 of the ’118 Patent. Upon information and belief, the infringing functionality of the Siege crossbow is representative of and substantially the same as the infringing functionality of each reverse draw crossbow within the Infringing Crossbows. This demonstration of infringement is offered by way of example only and without limitation to Ravin’s ability to demonstrate Defendant’s infringement of additional claims of the ’118 Patent, including by making, importing, using, offering for sale, and selling additional products in the United States.

80. Ravin has been and continues to be damaged by Defendant’s infringement of the ’118 Patent. Ravin is entitled to recovery of monetary damages for such injuries pursuant to 35 U.S.C. § 284, in an amount to be determined at trial.

81. Defendant has committed the foregoing infringing activities without license from Ravin and, upon information and belief, with knowledge of the ’118 Patent.

82. Upon information and belief, Defendant knew of the ’118 Patent while committing the foregoing infringing acts, thereby willfully, wantonly, and deliberately infringing the ’118 Patent. Ravin’s damages should be trebled pursuant to 35 U.S.C. § 284 because of Defendant’s willful infringement of the ’118 Patent.

83. Upon information and belief, the acts of infringement by Defendant have been performed with the knowledge of the ’118 Patent and are willful, wanton, and deliberate, thus rendering this action “exceptional” within the meaning of 35 U.S.C. § 285 and entitling Ravin to its reasonable attorneys’ fees and litigation expenses.

84. If Defendant’s marketing and sales of the Infringing Crossbows are not enjoined, Ravin will suffer substantial and irreparable harm for which there is no remedy at law.

COUNT VI

INFRINGEMENT OF U.S. PATENT NO. 11,085,728

85. Ravin incorporates by reference paragraphs 1 – 39 as if fully set forth herein.

86. The ’728 Patent is valid and enforceable.

87. TenPoint, directly or through the actions of its employees, divisions, and/or subsidiaries, has infringed and continues to infringe, either literally or under the doctrine of equivalents, at least one of the claims of the ’728 Patent, including but not limited to claim 10, under 35 U.S.C. § 271(a) by, among other things, making, importing, using, offering for sale, and selling in the United States the following products: Nitro 505 Xero, Nitro 505 Oracle X, Nitro 505, Vapor RS470 Xero, Vapor RS470, Havoc RS440 Xero, Havoc RS440, Vengent S440, Siege RS410, Viper S40 Oracle X, Viper S400, Wicked Ridge NXT 400, NXT 400, Turbo S1, Stealth NXT, Shadow NXT, Nitro XRT, Nitro X, and XR-410.

88. Specifically, Exhibit 12 provides a representative example of how the TenPoint Vengent and all other similarly configured bows meet each and every claim limitation of claim 10 of the ’728 Patent. Upon information and belief, the infringing functionality of the Vengent crossbow is representative of and substantially the same as the infringing functionality of each forward draw and reverse draw crossbow within the Infringing Crossbows. This demonstration of infringement is offered by way of example only and without limitation to Ravin’s ability to demonstrate Defendant’s infringement of additional claims of the ’728 Patent, including by making, importing, using, offering for sale, and selling additional products in the United States.

89. Ravin has been and continues to be damaged by Defendant’s infringement of the ’728 Patent. Ravin is entitled to recovery of monetary damages for such injuries pursuant to 35 U.S.C. § 284, in an amount to be determined at trial.

90. Defendant has committed the foregoing infringing activities without license from Ravin and, upon information and belief, with knowledge of the ’728 Patent.

91. Upon information and belief, Defendant knew of the ’728 Patent while committing the foregoing infringing acts, thereby willfully, wantonly, and deliberately infringing the ’728

Patent. Ravin's damages should be trebled pursuant to 35 U.S.C. § 284 because of Defendant's willful infringement of the '728 Patent.

92. Upon information and belief, the acts of infringement by Defendant have been performed with the knowledge of the '728 Patent and are willful, wanton, and deliberate, thus rendering this action "exceptional" within the meaning of 35 U.S.C. § 285 and entitling Ravin to its reasonable attorneys' fees and litigation expenses.

93. If Defendant's marketing and sales of the Infringing Crossbows are not enjoined, Ravin will suffer substantial and irreparable harm for which there is no remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Ravin prays that this Court grant the following relief:

a) A judgment that the claims of the Patents-in-Suit are infringed, either literally and/or under the doctrine of equivalents, by Defendant's making, importing, using, offering to sell, and selling the Infringing Crossbows in the United States;

b) An Order permanently enjoining Defendant, its affiliates and subsidiaries, and any of their officers, agents, servants, employees, and those acting in privity or concert with them, from making, having made, using, offering to sell, selling, marketing, distributing, and/or importing the Infringing Crossbows or any other product that infringes the Patents-in-Suit;

c) An award of compensatory damages and/or other monetary relief, including lost profits, adequate to compensate Ravin for Defendant's infringement of the Patents-in-Suit, but in no event less than a reasonable royalty for the use of the inventions in the Patents-in-Suit by Defendant, together with interest and costs as fixed by the Court and trebled for willful infringement as provided by 35 U.S.C. § 284;

d) A declaration that this case is exceptional, thereby entitling Ravin to an award of its costs and reasonable attorneys' fees in accordance with 35 U.S.C. § 285; and

e) All such other relief as this Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Ravin hereby demands trial by jury in this action of all claims so triable.

Dated: December 17, 2021.

Respectfully submitted,

SANTORO WHITMIRE

/s/ Nicholas J. Santoro

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