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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-GMN-EJY **PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS AND PRELIMINARY INFRINGEMENT CONTENTIONS**

EX2012
Ravin Crossbows, LLC
IPR2023-00407

Plaintiff Ravin Crossbows, LLC ("Ravin") provides the following Local Patent Rule 1-6 Disclosure of Asserted Claims and Infringement Contentions to Defendant Hunter's Manufacturing Company, Inc. d/b/a TenPoint Crossbow Technologies ("TenPoint").

I. PRELIMINARY STATEMENT

Ravin provides its Local Patent Rule 1-6 contentions, which contain the following information:

(a) an identification of each claim of U.S. Patent Nos. 9,354,015 ("the '015 Patent"), 9,494,379 ("the '379 Patent"), 9,879,936 ("the '936 Patent"), 10,254,073 ("the '073 Patent"), 10,712,118 ("the '118 Patent"), and 11,085,728 ("the '728 Patent") (collectively, "Asserted Patents") that is infringed by TenPoint under 35 U.S.C. § 271(a);

(b) for each asserted claim, the identity of each Accused Instrumentality of which Ravin is aware, and specifically for each product, device, and apparatus, the names or model numbers known by Ravin;

(c) charts identifying where each element of each asserted claim is found in at least one of the representative Accused Instrumentalities;

(d) an identification of any indirect infringement allegations;

(e) a statement identifying whether each element of each asserted claim is claimed to be literally present or present under the doctrine of equivalents;

(f) the priority date to which each asserted claim is entitled;

(g) identification of Ravin's own product(s) that incorporate(s) or reflect(s) each asserted claim; and

(h) the basis for Ravin's allegations that TenPoint willfully infringes the Asserted Patents.

In providing these contentions, Ravin has not yet received responses to the discovery requests served on TenPoint regarding its infringing products. Ravin has researched available information, including publicly available information published by TenPoint on the Accused Instrumentalities and publicly available statements and information published by others

EX2012
Ravin Crossbows, LLC
IPR2023-00407

describing TenPoint's Accused Instrumentalities. Where public information on the operation of TenPoint's products was not available, Ravin has relied on its good faith belief as to the likely operation based on its analysis of available information.

These preliminary contentions may be amended or supplemented without leave of court until the post-claim construction amendment of contentions per LPR 1-18a and are being provided without prejudice to Ravin's rights. Ravin expressly reserves the right to amend, expand, add, supplement, change, alter, or otherwise modify its contentions as Ravin learns new information, TenPoint introduces or releases new products, additional facts are ascertained as discovery progresses in this case, including written discovery, document production, and fact and expert depositions, analyses are made, in response to any of TenPoint's contentions, and claims are construed.

(a) Each claim of each patent in suit that is allegedly infringed by each opposing party, including for each claim the applicable statutory subsections of 35 U.S.C. § 271 asserted;

TenPoint infringes the following claims of the Asserted Patents:

Asserted Patent	Asserted Claims	Relevant Subsection(s) of 35 U.S.C. § 271
'015 Patent	1–9 and 11–16	35 U.S.C. § 271(a)
'379 Patent	1–7 and 9–19	35 U.S.C. § 271(a)
'936 Patent	1–7 and 9–19	35 U.S.C. § 271(a)
'073 Patent	1–6, 8–29, and 31–34	35 U.S.C. § 271(a)
'118 Patent	1–6, 8–15, and 19	35 U.S.C. § 271(a)
'728 Patent	10–13 and 15	35 U.S.C. § 271(a)

(b) Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality ("Accused Instrumentality") of each opposing party of which the party is aware. This identification must be as specific as possible. Each product, device, and apparatus must be identified by name or model number, if known. Each method or process must be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process;

EX2012
Ravin Crossbows, LLC
IPR2023-00407

The Accused Instrumentalities include TenPoint's forward draw crossbows ("the Forward Draw Products") and reverse draw crossbows ("the Reverse Draw Products").

Forward Draw Products

The Forward Draw Products include at least:

- Vengent S440
- Viper S400
- Viper S400 Oracle X
- Stealth NXT
- Shadow NXT
- Turbo S1
- Wicked Ridge NXT 400

At least one of the Forward Draw Products include cams that rotate greater than about 360 degrees (the "Forward Draw 360 Degree Rotation Products"). The Forward Draw 360 Degree Rotation Products includes at least the Vengent S440.

Reverse Draw Products

The Reverse Draw Products include:

- Vapor RS470
- Vapor RS470 Xero
- Havoc RS440
- Havoc RS440 Xero
- Siege RS410
- Nitro X
- Nitro XRT
- XR-410
- Nitro 505
- Nitro 505 Oracle X
- Nitro 505 Xero

Several of the Reverse Draw Products include cams that rotate greater than about 360 degrees (collectively "the Reverse Draw 360 Degree Rotation Products"). The Reverse Draw 360 Degree Rotation Products include at least:

- Vapor RS470
- Vapor RS470 Xero
- Nitro XRT
- Nitro 505
- Nitro 505 Oracle X
- Nitro 505 Xero

The following tables identify which claims of the Asserted Patents the Accused Instrumentalities infringe.

1. ’015 Patent

Claim	Accused Instrumentality
1–8 and 11–16	Reverse Draw Products
9	Reverse Draw 360 Degree Rotation Products

2. ’379 Patent

Claim	Accused Instrumentality
1–5, 7, 9–16, and 18–19	Forward Draw Products; Reverse Draw Products
6 and 17	Forward Draw 360 Degree Rotation Products; Reverse Draw 360 Degree Rotation Products

3. ’936 Patent

Claim	Accused Instrumentality
1–5, 7, 9–16, and 18–19	Forward Draw Products; Reverse Draw Products
6 and 17	Forward Draw 360 Degree Rotation Products; Reverse Draw 360 Degree Rotation Products

4. ’073 Patent

Claim	Accused Instrumentality
1–6, 8–29, and 31–34	Reverse Draw Products

5. ’118 Patent

Claim	Accused Instrumentality
1–6, 8–15, and 19	Reverse Draw Products

EX2012
Ravin Crossbows, LLC
IPR2023-00407

6. '728 Patent

Claim	Accused Instrumentality
10–13 and 15	Forward Draw Products; Reverse Draw Products

(c) A chart identifying specifically where each limitation of each asserted claim is found within each Accused Instrumentality, including for each limitation that such party contends is governed by 35 U.S.C. § 112(6) (pre-AIA) or 35 U.S.C. § 112(f) (post-AIA), the identity of the structure(s), act(s), or material(s) in the Accused Instrumentality that performs the claimed function;

Discovery in this matter has not yet begun. Consequently, these preliminary contentions are based in large part upon information that Ravin has been able to discern from publicly availably sources and inspections of an exemplary forward draw crossbow, the Vengent RS440 (Serial No. C027016), and an exemplary reverse draw crossbow, the Siege RS410 (Serial No. S013990). Ravin reserves its rights to amend these contentions upon completion of its inspection of the Accused Instrumentalities as set forth in its Notice of Inspection served on TenPoint on May 9, 2022.

Upon information and belief, the Vengent RS440 and Siege RS410 are not materially different from the other accused Forward Draw and Reverse Draw Products, respectively, for the purposes of any infringement analysis in this matter.[1] Exhibit 1 illustrates the material similarities between the exemplary forward draw crossbow, the Vengent RS440, and the accused Forward Draw Products. Exhibit 2 illustrates the material similarities between the exemplary reverse draw crossbow, the Siege RS410, and the accused Reverse Draw Products. Notably, TenPoint's "Vector Quad Cable Technology," a structure and functionality that implicates infringement, is readily observed in TenPoint's marketing material as being present in all of the Accused Instrumentalities. In addition, TenPoint offers a single owner's manual that applies to all of the Accused Instrumentalities, which further emphasizes the lack of any material

[1] The only apparent differences appear to be relative sizes and scope configurations, which do not impact the infringement analysis.

EX2012
Ravin Crossbows, LLC
IPR2023-00407

differences between the exemplary crossbows and the accused Forward and Reverse Draw Products.

Attached are claim charts identifying specifically where each limitation of each asserted claim in each asserted patent is found in the Accused Instrumentalities:

Chart	Accused Instrumentalities	Patent
A-1	Exemplary Forward Draw Crossbow Vengent RS440	’379 Patent
A-2	Exemplary Forward Draw Crossbow Vengent RS440	’936 Patent
A-3	Exemplary Forward Draw Crossbow Vengent RS440	’728 Patent
B-1	Exemplary Reverse Draw Crossbow Siege RS410	’015 Patent
B-2	Exemplary Reverse Draw Crossbow Siege RS410	’379 Patent
B-3	Exemplary Reverse Draw Crossbow Siege RS410	’936 Patent
B-4	Exemplary Reverse Draw Crossbow Siege RS410	’073 Patent
B-5	Exemplary Reverse Draw Crossbow Siege RS410	’118 Patent
B-6	Exemplary Reverse Draw Crossbow Siege RS410	’728 Patent

(d) For each claim that is alleged to have been indirectly infringed, an identification of any direct infringement and a description of the acts of the alleged indirect infringer that contribute to or are inducing that direct infringement. If alleged direct infringement is based on joint acts of multiple parties, the role of each party in the direct infringement must be described;

For the purposes of this litigation, none of the Asserted Claims are alleged to be indirectly infringed; each of the Asserted Claims are infringed directly under 35 U.S.C. § 271(a).

(e) Whether each limitation of each asserted claim is alleged to be literally present or present under the doctrine of equivalents in the Accused Instrumentality;

Each limitation of the Asserted Claims is literally present in the Accused Instrumentalities. Ravin reserves the right to allege infringement under the doctrine of equivalents after receiving additional discovery from TenPoint, TenPoint's claim construction positions, and/or the Court's claim construction decision(s).

(f) For any patent that claims priority to an earlier application, the priority date to which each asserted claim allegedly is entitled;

Each Asserted Claim is entitled to at least the priority dates summarized in the following tables:

1. '015 Patent

Claim(s)	Priority Date
1–9 and 11-16	December 16, 2013

2. '379 Patent

Claim(s)	Priority Date
1–7 and 9–19	December 16, 2013

EX2012
Ravin Crossbows, LLC
IPR2023-00407

3. '936 Patent

Claim(s)	Priority Date
1–7, 10–17, and 19	December 16, 2013
9 and 18	April 14, 2016

4. '073 Patent

Claim(s)	Priority Date
1–6, 8, 10–29, and 31–34	December 16, 2013
9	December 30, 2016

5. '118 Patent

Claim(s)	Priority Date
1–6, 8–15, and 19	December 16, 2013

6. '728 Patent

Claim(s)	Priority Date
10–13 and 15	December 16, 2013

(g) If a party claiming patent infringement wishes to preserve the right to rely, for any purpose, on the assertion that its own apparatus, product, device, process, method, act, or other instrumentality practices the claimed invention, the party must identify, separately for each asserted claim, each such apparatus, product, device, process, method, act, or other instrumentality that incorporates or reflects that particular claim;

EX2012
Ravin Crossbows, LLC
IPR2023-00407

1. ’379 Patent

Claim(s)	Ravin’s Embodying Products
1–5, 7, 9–16, and 18–19	R26X Crossbow; R5X Crossbow; R10X Crossbow; R500E Crossbow; R500E Sniper Package; R500 Crossbow; R500 Sniper Package; R29X Crossbow; R29X Sniper Package; R10 Crossbow; R29 Crossbow; R26 Crossbow; R20 Sniper Package; R20 Crossbow; R9 Crossbow; R15 Crossbow
6 and 17	R500E Crossbow; R500E Sniper Package; R500 Crossbow

2. ’936 Patent

Claim(s)	Ravin’s Embodying Products
1–5, 7, 9–16, and 18–19	R26X Crossbow; R5X Crossbow; R10X Crossbow; R500E Crossbow; R500E Sniper Package; R500 Crossbow; R500 Sniper Package; R29X Crossbow; R29X Sniper Package; R10 Crossbow; R29 Crossbow; R26 Crossbow; R20 Sniper Package; R20 Crossbow; R9 Crossbow; R15 Crossbow
6 and 17	R500E Crossbow; R500E Sniper Package; R500 Crossbow

EX2012
Ravin Crossbows, LLC
IPR2023-00407

3. ’728 Patent

Claim(s)	Ravin’s Embodying Products
10–13 and 15	R26X Crossbow; R5X Crossbow; R10X Crossbow; R500E Crossbow; R500E Sniper Package; R500 Crossbow; R500 Sniper Package; R29X Crossbow; R29X Sniper Package; R10 Crossbow; R29 Crossbow; R26 Crossbow; R20 Sniper Package; 20 Crossbow; R9 Crossbow; R15 Crossbow

(h) If a party claiming patent infringement alleges willful infringement, the basis for the allegation.

TenPoint has had actual notice of the Asserted Patents since at least July 15, 2017. TenPoint was aware of Ravin’s patented HeliCoil® technology, which is protected by the Asserted Patents, when developing the Accused Instrumentalities, at least due to its position as a licensing partner with Ravin on unrelated technology, its communications with Ravin’s representatives, and its access to information regarding Ravin’s crossbows at trade shows and online.

More specifically, 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 Asserted Patents (the ’015 and ’379 Patents) and the patent application numbers for the applications that ultimately issued as the ’936 and ’073 Patents. Thereafter, on November 27, 2017, TenPoint’s representative contacted Ravin’s representative seeking a potential license to Ravin’s helical cam patents, including the Asserted Patents, which correspond to Ravin’s HeliCoil® technology. Ravin did not grant and TenPoint did not receive nor does TenPoint have a license to any of the Asserted Patents.

EX2012
Ravin Crossbows, LLC
IPR2023-00407

On information and belief, TenPoint's "Vector Quad Cable Technology" willfully copied Ravin's patented HeliCoil® technology. TenPoint released the Infringing Instrumentalities with the "Vector Quad Cable Technology" only after Ravin's R9 and R15 were introduced and threatened TenPoint's market position and profitability. For example, despite being aware of the Asserted Patents, TenPoint introduced the Shadow NXT, the Stealth NXT, and the Nitro in 2018[2] with knowledge that they contained a helical cam covered by one or more claims of the Asserted Patents.

The striking similarities between the Accused Instrumentalities and Ravin's groundbreaking HeliCoil® technology highlight that TenPoint designed the Accused Instrumentalities – including the "Vector Quad Cable Technology" – specifically to incorporate Ravin's patented HeliCoil® technology, as claimed in the Asserted Patents. On information and belief, TenPoint's development of the Accused Instrumentalities 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 and practice the Asserted Patents.

At a minimum, one or more of the Asserted Patents have been listed on Ravin's website since at least as early as August 22, 2017, providing the necessary constructive notice and virtual marking of Ravin's crossbows.

Notwithstanding its knowledge and infringement of the Asserted Patents, in a malicious, deliberate, and consciously wrongful manner, TenPoint continues to make, offer to sell, and sell the Accused Instrumentalities in bad faith.

II. DOCUMENT PRODUCTION PURSUANT TO LPR 1-7

Ravin is concurrently serving Ravin's document production, which includes, among other things, documents pursuant to LPR 1-7. The following lists the specific documents that correspond to each category of LPR 1-7:

[2] https://www.tenpointcrossbows.com/blog/the-nxt-crossbow-revolution/

LPR 1-7(a) Documents: Ravin is not aware of any non-privileged or non-work product documents that are responsive to this category;

LPR 1-7 (b) Documents: Ravin is not aware of any non-privileged or non-work product documents that are responsive to this category;

LPR 1-7(c) Documents: Documents responsive to this category are being produced with production numbers RAVIN-0000639 - RAVIN-0003341, RAVIN-0003558 - RAVIN-0003799;

LPR 1-7(d) Documents: Documents responsive to this category are being produced with production numbers RAVIN-0003342 - RAVIN-0003478; and

LPR 1-7(e) Documents: Documents responsive to this category are being produced with production numbers RAVIN-0000001 – RAVIN-0000250, RAVIN-0003479 - RAVIN-0003557.

Ravin has used its best efforts to identify all responsive LPR 1-7 documents and only those documents. However, despite these best efforts, some documents may have been inadvertently listed or inadvertently omitted. To the extent such deficiencies are identified, Ravin will supplement its production accordingly.

Dated: May 23, 2022

Respectfully submitted,

/s/ Kadie M. Jelenchick

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EX2012
Ravin Crossbows, LLC
IPR2023-00407

PROOF OF SERVICE

I hereby certify that on the 23rd day of May, 2022, a true and correct copy of the foregoing **PLAINTIFF'S DISCLOSURE OF ASSERTED CLAIMS AND PRELIMINARY INFRINGEMENT CONTENTIONS** was served on all counsel of record for Defendant via electronic mail.

/s/ Michelle A. Moran
Michelle A. Moran

EX2012
Ravin Crossbows, LLC
IPR2023-00407

EXHIBIT 1

EX2012
Ravin Crossbows, LLC
IPR2023-00407

EXHIBIT 1 – FORWARD DRAW PRODUCTS

<table>
<tr><th colspan="2">Exemplary Forward Draw Product -TenPoint Vengent S440</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

EXHIBIT 1 – FORWARD DRAW PRODUCTS

<table>
<tr><th colspan="2">TenPoint Viper S400</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

EXHIBIT 1 – FORWARD DRAW PRODUCTS

TenPoint Viper S400 Oracle X



Rear Perspective View



Front Perspective View



Side View



Top View



Detail View of Cam

EXHIBIT 1 – FORWARD DRAW PRODUCTS

<table>
<tr><th colspan="2">TenPoint Stealth NXT</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

EXHIBIT 1 – FORWARD DRAW PRODUCTS

<table>
<tr><th colspan="2">TenPoint Shadow NXT</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

EXHIBIT 1 – FORWARD DRAW PRODUCTS

TenPoint Turbo S1



Rear Perspective View



Front Perspective View



Side View



Top View



Detail View of Cam

EXHIBIT 1 – FORWARD DRAW PRODUCTS

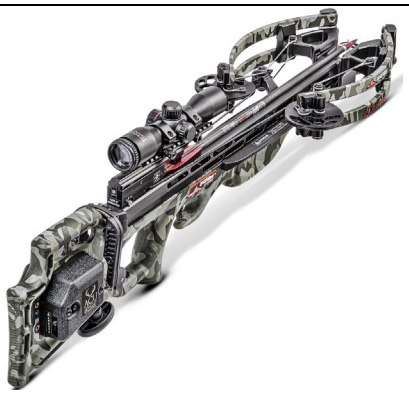
Wicked Ridge NXT 400	
 Rear Perspective View	 Front Perspective View
 Side View	
 Top View	 Detail View of Cam

EXHIBIT 2

EX2012
Ravin Crossbows, LLC
IPR2023-00407

EXHIBIT 2 – REVERSE DRAW PRODUCTS

Exemplary Reverse Draw Product - TenPoint Siege RS410



Rear Perspective View



Forward Perspective View



Side View



Top View



Detail View of Cam

EXHIBIT 2 – REVERSE DRAW PRODUCTS

<table>
<tr><th colspan="2">TenPoint Vapor RS470 Xero</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

EXHIBIT 2 – REVERSE DRAW PRODUCTS

<table>
<tr><th colspan="2">TenPoint Vapor RS470</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

EXHIBIT 2 – REVERSE DRAW PRODUCTS

<table>
<tr><th colspan="2">TenPoint Havoc RS440</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

EXHIBIT 2 – REVERSE DRAW PRODUCTS

TenPoint Havoc RS440 Xero



Rear Perspective View



Front Perspective View



Side View



Top View



Detail View of Cam

EXHIBIT 2 – REVERSE DRAW PRODUCTS

<table>
<tr><th colspan="2">TenPoint Nitro XRT</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

EXHIBIT 2 – REVERSE DRAW PRODUCTS

TenPoint Nitro X



Rear Perspective View



Front Perspective View



Side View



Top View



Detail View of Cam

EXHIBIT 2 – REVERSE DRAW PRODUCTS

<table>
<tr><th colspan="2">TenPoint XR-410</th></tr>
<tr><td>
Rear Perspective View</td><td>
Front Perspective View</td></tr>
<tr><td colspan="2">
Side View</td></tr>
<tr><td>
Top View</td><td>
Detail View of Cam</td></tr>
</table>

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EXHIBIT 2 – REVERSE DRAW PRODUCTS

TenPoint Nitro 505



Rear Perspective View



Front Perspective View



Side View



Top View



Detail View of Cam

EXHIBIT 2 – REVERSE DRAW PRODUCTS

TenPoint Nitro 505 Oracle X



Rear Perspective View



Front Perspective View



Side View



Top View



Detail View of Cam

EXHIBIT 2 – REVERSE DRAW PRODUCTS

TenPoint Nitro 505 Xero



Rear Perspective View



Front Perspective View



Side View



Top View



Detail View of Cam