

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ATRIUS DEVELOPMENT GROUP CORP.

Petitioner,

v.

ABC IP LLC

Patent Owner.

IPR2025-01473

U.S. Patent No. 12,038,247

**Petitioner's First Amended
Exhibit List**

Pursuant to 37 C.F.R. § 42.63 (e), Petitioner hereby submits a current listing of its exhibits to counsel for Patent Owner Exhibits 1024 through 1032 were filed on P-TACTS and served via email to Patent Owner’s counsel of record.

Petitioner’s First Amended Exhibit List¹

<i>Exhibit</i>	<i>Description</i>
1001	U.S.P.N. 12,038,247 (“Blakely ’247”)
1002	Prosecution History of Blakely ’247 (“FWH Blakely ’247”)
1003	Provisional 63/374,941 relied upon by Blakely ’247 (“Blakely Prov”)
1004	Declaration of Malcolm Brown (“Brown Decl”)
1005	Bingly, Radian Mod for Tommy Trigger upgrade kit, YouTube video June 5, 2022 (available at https://www.youtube.com/watch?v=Kj2S8gfTWew) (“Bingly_1”)
1006	Bingly, Tommy Trigger's Alamo 15 and Rare Breed FRT/E3 Safety Selector Guide, YouTube video June 29, 2022 (available at https://www.youtube.com/watch?v=00mQ2mfjqfU) (“Bingly_2”)
1007	Bingly, Tommy Trigger 3 Selector Install for Alamo 15, YouTube video August 1, 2022 (available at https://www.youtube.com/watch?v=PSvjkaUGJ3Q) (“Bingly_3”)
1008	<i>Rare Breed, et al. v. Strbac, et al.</i> , 1:22-cv-00280 (N.D. Ohio) Complaint (“Tommy”)
1009	U.S.P.N. 7,398,723 (“Blakely ’723”)
1010	U.S.P.N. 2,056,975 (“Michal ’975”)
1011	U.S.P.N. 4,023,465 (“Inskip ’465”)
1012	U.S.P.N. 3,045,555 (“Stoner ’555”)
1013	U.S.P.N. 9,952,012 (“Fellows ’012”)

¹ All citations to issued patents are to column:line, and all citations to videos are to minute:second.

1014	Applicant appeal brief from prosecution history of Blakley '723
1015	U.S.P.N. 10,514,223 ("Rounds '223")
1016	Red line comparison of Blakley '247 specification to Blakely provisional application 63/374,941
1017	45Snipers, How an AR-15 Rifle Works, YouTube video March 15, 2017 available at https://www.youtube.com/watch?v=ASLjfuDsrzo ("AR-15 Video")
1018	Declaration of Todd Price (Page Vault) authenticating YouTube videos ("Price Decl.")
1019	Page Vault explanation of files and data obtained
1020 Corrected	Page Vault capture summary of files and data obtained
1021	Page Vault capture of Ex.1005 downloaded to Wayback Machine on August 13, 2022
1022	Page Vault capture of Ex.1006 downloaded to Wayback Machine on July 5, 2022.
1023	Page Vault capture of Ex.1007 downloaded to Wayback Machine on May 10, 2023
1024	Liberty 1776, FRT-15 E3, YouTube video January 15, 2022 (available at https://www.youtube.com/watch?v=ZJ0lWi2kfC0) ("DeMonico FRT-15-3E video")
1025	Excerpts from Hoffman Tactical, Introducing the Orca, YouTube video January 26, 2023 (available at https://www.youtube.com/watch?v=uB3ciHT5qwY) ("Super Safety video") at 0:22–0:35; 1:05–1:53
1026	Excerpts from PSR, Orca Go Brrr, YouTube video May 7, 2023 (available at https://www.youtube.com/watch?v=auAqg-FiHv4) ("Super Safety more detailed video") at 15:03–15:20; 16:19–16:23
1027	PO cease-and-desist letter to Hoffman dated February 9, 2022

1028–1 1028–2	Excerpts from Fitty%, Semiautomatic Super Safety How It Works, YouTube video May 18, 2024 (available at https://www.youtube.com/watch?v=KIXsnh2fFTo) (“Super Safety inner working video) at 0:00–0:05; 5:43–7:14; 10:05–10:15
1029	<i>ABC IP, et al. v. Hanes</i> Complaint re Super Safety
1030	Excerpt from James Reeves, Exclusive: Inside the FRT Settlement with Rare Breed, YouTube video June 1, 2025 (available at https://www.youtube.com/watch?v=5qtoLBHTNpI) (“PO alleged monopoly video”) at 25:12–26:05
1031	Prosecution history of U.S.P.N. 11,724,003 (“FWH Strbac ’003”)
1032	PO cease-and-desist letter to Tommy Triggers dated January 17, 2022

Certification of Service

Pursuant to 37 C.F.R. § 42.6, the undersigned certifies that a copy of the foregoing was served by email on the following:

AWieker@McGuireWoods.com

GDavis@McGuireWoods.com

KSmith@McGuirewoods.com

ABC_IPRs@mcguirewoods.com)

on the date below.

Respectfully submitted,
FLOYD IP
BY: /Adam V. Floyd/
Adam V. Floyd
USPTO Reg. No. 39,192
Floyd IP
3203 Bluffs Lane
Parker, TX 75002
512.497.7500
AFloyd@FloydIP.com

Counsel for Petitioner

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