



WOOD HERRON & EVANS LLP
intellectual property law



Clement H. Luken, Jr.
Thomas J. Burger
Gregory F. Ahrens
Wayne L. Jacobs
Kurt A. Summe
Keith R. Haupt
Theodore R. Remaklus
Thomas W. Humphrey
David H. Brinkman
Kathryn E. Smith
P. Andrew Blatt, Ph.D.

David E. Jefferies
J. Dwight Poffenberger, Jr.
John Paul Davis
Brett A. Schatz
Sarah Otte Graber
Randall S. Jackson, Jr.
Lori Krafte
Glenn D. Bellamy
Steven W. Benintendi, Ph.D.
Charles H. Brown III
Kevin E. Kuehn

David A. Fitzgerald II
Sean K. Owens
W. Scott Gaines
John H. Bieber
Charles D. Pfister
Michael E. Benson
Jorge L. Tameron
Louis H. Sitler
Julie F. Kappelman

Bruce Tittel*
David J. Josephic*
David S. Stallard*
Kenneth B. Germain*
Stephen E. Gillen*

* Counsel

GBELLAMY@WHE-LAW.COM
DIRECT: (513) 707-0243

February 9, 2022

Via FedEx

Mr. Tim Hoffman
Hoffman Tactical
211 Shoal Creek Road
Englewood, TN 37329

Re: Patent Infringement

Dear Mr. Hoffman,

This firm represents ABC IP, LLC ("ABC") and Rare Breed Triggers LLC ("Rare Breed") in intellectual property matters. ABC owns U.S. Patent No. 10,514,223 ("the '223 Patent") and Rare Breed exclusively sells the patented FRT-15™ trigger. A copy is enclosed for your convenience.

It has come to our attention that you, doing business as Hoffman Tactical, are offering and distributing a downloadable 3D-printable model for parts with instructions to convert a "standard" AR-pattern trigger into a forced reset type trigger. This device, when made and assembled as instructed, creates a forced reset trigger that clearly infringes claims of the '223 Patent. Specifically, the combination has a hammer and a trigger member with engaging sear surfaces, and the trigger member (with the installed adapter) has a surface positioned to be contacted by the hammer when the hammer is displaced by cycling of the bolt carrier. A spring-biased locking bar is supported by a frame and mechanically blocks the trigger from being moved from the set position until the bolt carrier returns to a substantially in-battery position.

Federal patent law provides that any person who actively induces infringement of a patent is fully liable as an infringer. *See* 35 U.S.C. § 271(b). Liability attaches when a person actively enables and encourages infringement, knowing that the acts they induce constitute

Atrius v ABC
IPR2025-01473
Atrius Ex. 1027--1

Mr. Tim Hoffman
Hoffman Tactical
February 9, 2022
Page 2

patent infringement, and their acts resulted in direct patent infringement. In this case, the person who prints and assembles the device according to your model and instructions is a direct infringer. Your actions are actively encouraging and enabling infringement, and you now know that those acts constitute patent infringement. It does not matter whether you are making money from your actions. Damages liability is determined by the harm caused to the patent owner.

Accordingly, we must demand that you **immediately** cease and desist from any further distribution or dissemination of any models to make an infringing forced reset trigger. Continuing to do so may be found to be willful infringement, which can incur a judgment of treble damages and/or payment of ABC and/or Rare Breed's attorneys' fees in litigation. *See* 35 U.S.C. § 284.

We further demand that, no later than February 23, 2022, you:

1. Confirm in writing that you (or any affiliated company) have ceased any further distribution or dissemination of the "3D Printed 'FRT' Trigger" model or similar models;
2. Provide the date that distribution and/or dissemination of the 3D models began;
4. Provide records showing the total number of downloads to date; and
5. Provide records showing any revenue for related sales.

After receiving this confirmation and information, we can negotiate a resolution of this matter.

We urge you to seek the advice of a competent patent attorney in this very serious matter and look forward to your prompt response.

This letter is without prejudice to any claims or remedies available to Rare Breed Triggers LLC and ABC IP, LLC, including damages, injunctive relief, and/or attorneys' fees.

Very truly yours,



Glenn D. Bellamy

Enclosure

cc: Rare Breed Triggers LLC