



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.

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David A. Fitzgerald II
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W. Scott Gaines
John H. Bieber
Charles D. Pfister
Michael E. Benson
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

January 17, 2022

Via E-mail (mladen.strbac@yahoo.com)

Mr. Tom Strbac
Tommy Triggers
2589 Lakewood Boulevard
Euclid, Ohio 44132

Re: Patent Infringement

Dear Mr. Strbac:

This firm represents ABC IP, LLC ("ABC") and Rare Breed Triggers LLC ("Rare Breed") in intellectual property matters. As you are aware, 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 Tommy Triggers is making, offering, and/or selling an AR platform drop-in trigger that infringes on the '223 Patent. Specifically, it has a hammer and a trigger member with engaging sear surfaces, and the trigger member has a surface positioned to be contacted by the hammer when the hammer is displaced by cycling of the bolt carrier. A locking bar mechanically blocks the trigger from being moved from the set position until the bolt carrier returns to a substantially in-battery position. The presence of other, addition features (such as capability to switch between forced reset and disconnecter modes) does not avoid infringement.

Accordingly, we must demand that you immediately cease and desist from any further manufacture, offer, or sale of the infringing 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

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and/or Rare Breed's attorneys' fees in litigation.

I understand you have been in contact with Lawrence DeMonico, President of Rare Breed, to discuss resolution of this dispute. We are happy to continue that discussion.

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, including damages, injunctive relief, and/or attorneys' fees.

Very truly yours,



Glenn D. Bellamy

Enclosure

cc: Rare Breed Triggers, LLC
ABC IP, LLC

