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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 14, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 10514223 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10514223 (the "10514223 Patent"). After preliminary review, we have substantial concerns about the validity, enforceability, and scope of the asserted claims, summarized below. We reserve all rights and defenses.

1. Subject Patent — Summary

Patent Analysis: U.S. Patent No. 10,514,223

Date of Analysis: May 1, 2026

Patent Number: 10,514,223

Summary

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| Title | Firearm trigger mechanism |

| Assignee | ABC IP LLC (as of May 2, 2025) |

| Inventor | Jeffrey Cooper Rounds |

| Filing Date | September 27, 2018 |

| Issue Date | December 24, 2019 |

| Abstract | A trigger mechanism for use in a firearm having a receiver with a fire control mechanism pocket, transversely aligned pairs of hammer and trigger pin openings in the side walls of the pocket, and a bolt carrier that reciprocates and pivotally displaces a hammer when cycled. The trigger mechanism includes a hammer, a trigger member, and a locking bar....

2. Validity Concerns under 35 U.S.C. § 102 — Prior Art

We have identified prior-art references that, in our preliminary view, anticipate one or more asserted claims of the 10514223 Patent:

Analysis of Prior Art Cited in U.S. Patent No. 10,514,223

This analysis details the most relevant prior art cited during the examination of U.S. Patent 10,514,223. Each cited reference is examined for its potential to anticipate the claims of the '223 patent under 35 U.S.C. § 102. The core innovation of the '223 patent is a trigger mechanism featuring a forced-reset function, accomplished by the hammer directly resetting the trigger, combined with a locking bar that is actuated by the bolt carrier to prevent out-of-battery firing.

Key Prior Art and Potential Anticipation

The following patents and patent applications were cited by the examiner during the prosecution of the '223 patent.

1. U.S. Patent Application Publication No. US 2017/0219307 A1 (Fostech Mfg Llc)

- Full Citation: US 2017/0219307 A1, "Trigger-Locking Apparatus, System, and Method for Semiautomatic Firearms"
- Publication Date: August 3, 2017
- Filing Date: January 28, 2016
- Brief Description: This application describes a trigger-locking mechanism for a semi-automatic firearm. It features a locking member...

4. Litigation History of the Patent

Public records reflect that the 10514223 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Rare Breed Triggers Inc et al. v. Gaven L Poczekaj, Sr et al. — 4:26-cv-00374 · Texas Eastern District Court · filed 2026-04-14 · Open
- Rare Breed Triggers Inc et al. v. Tyler Harrison et al. — 4:26-cv-00379 · Texas Eastern District Court · filed 2026-04-14 · Open
- Rare Breed Triggers Inc et al. v. Nicholas Norton et al. — 26-1527 · Court of Appeals for the Federal Circuit · filed 2026-03-17 · Open
- Rare Breed Triggers Inc et al. v. Canuck Tactical LLC — 2:26-cv-00576 · Louisiana Eastern District Court · filed 2026-03-17 · Open
- Rare Breed Triggers Inc et al. v. TRG Ventures, LP, A Texas Limited Partnership et al. — 2:26-cv-00201 · Texas Eastern District Court · filed 2026-03-13 · Open
- Rare Breed Triggers Inc et al. v. Optic Planet Inc — 1:26-cv-01072 · Illinois Northern District Court · filed 2026-01-29 · Open
- Untitled case — 1:21-cv-00149 · Florida Northern District Court

4. Request

In light of the foregoing, we request that your client (i) provide a detailed claim chart identifying each accused product or service and mapping every limitation of each asserted claim, (ii)

identify any prior art known to your client, including any references cited during prosecution or reexamination, and (iii) substantiate the basis for any damages or licensing demand. We are prepared to discuss the matter further once we have received and reviewed the foregoing.

Sincerely,

[Your Name]

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