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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. 12031784 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12031784 (the "12031784 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 Analyst Summary: U.S. Patent No. 12,031,784

Date of Analysis: April 26, 2026

A review of U.S. Patent No. 12,031,784, titled "Adapted forced reset trigger," has been conducted based on information from the USPTO database. Additionally, a search of CAFC 2026 dockets for this patent number was performed.

Patent Details:

- Title: Adapted forced reset trigger
- Assignee: ABC IP, LLC
- Inventor: Lawrence DeMonico
- Filing Date: November 4, 2022
- Issue Date: July 9, 2024
- Abstract: In a forced reset trigger mechanism, an extended trigger member locking device is provided. This device has a locking member that can move between a first position, where it prevents the trigger member from...

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 12031784 Patent:

Analysis of Prior Art Cited in U.S. Patent No. 12,031,784

As a technical patent analyst, I have reviewed the prior art citations for U.S. Patent No. 12,031,784, titled "Adapted forced reset trigger." The '784 patent, assigned to ABC IP, LLC, describes a locking member for a forced reset trigger with a deflectable upper portion. This feature is intended to allow the trigger to function in firearms with different internal dimensions, such as the AR-10 platform, where a standard locking bar would be too short to be actuated or would interfere with the bolt carrier's movement.

The analysis below details the most relevant prior art cited during the patent's prosecution and its potential impact on the claims of the '784 patent under 35 U.S.C. § 102.

Key Cited References

The primary inventive concept of the '784 patent revolves around a two-piece, hinged, or otherwise deflectable locking member that interacts with the bolt carrier. The most relevant prior art teaches the fundamental concepts of forced reset triggers and various safety and locking mechanisms.

1. U.S. Patent No....

3. Obviousness under 35 U.S.C. § 103

Independent of § 102, we believe the asserted claims are obvious in view of combinations of prior art that a person having ordinary skill in the art would have been motivated to combine:

Analysis of Obviousness for U.S. Patent No. 12,031,784 under 35 U.S.C. § 103

As a technical patent analyst, I have reviewed U.S. Patent No. 12,031,784 ('784 patent) and its cited prior art to assess the patentability of its claims under the obviousness standard of 35 U.S.C. § 103. The analysis focuses on whether a person having ordinary skill in the art (POSITA) would have been motivated to combine the teachings of existing prior art references to arrive at the claimed invention with a reasonable expectation of success.

The central innovation claimed in the '784 patent is a trigger locking member for a forced reset trigger mechanism that includes a main body and a separately movable, "upwardly extending deflectable portion." (Claim 1). This design solves a specific problem articulated in the patent's background section: adapting a forced reset trigger with a locking bar, like the one in U.S. Patent No. 10,514,223 ('223 patent), to firearm platforms with different internal geometries, such as the AR-10. In such platforms, a simple, rigid locking bar would be too short to be...

4. Litigation History of the Patent

Public records reflect that the 12031784 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. Hoffman Tactical LLC et al. — 4:26-cv-00378 · Texas Eastern District Court · filed 2026-04-14 · Open
- Rare Breed Triggers Inc et al. v. 80mills LLC et al. — 4:26-cv-00380 · Texas Eastern District Court · filed 2026-04-14 · Open
- Rare Breed Triggers Inc et al. v. AS Designs LLC et al. — 4:26-cv-00370 · Texas Eastern District Court · filed 2026-04-13 · Open
- Rare Breed Triggers Inc et al. v. Z3 Productions LLC — 4:26-cv-00367 · Texas Eastern District

Court · filed 2026-04-13 · Open

- Rare Breed Triggers Inc et al. v. Damion Terrell Bennett et al. — 4:26-cv-00369 · Texas Eastern District Court · filed 2026-04-13 · Open
- Rare Breed Triggers Inc et al. v. HK Parts Inc — 2:26-cv-00090 · Utah District Court · filed 2026-02-04 · Open
- Rare Breed Triggers Inc et al. v. Orion Arms Corp — 4:26-cv-00032 · Indiana Southern District Court · filed 2026-02-04 · Open
- Rare Breed Triggers Inc et al. v. Optic Planet Inc — 1:26-cv-01072 · Illinois Northern District Court · filed 2026-01-29 · Open
- *...and 5 additional case(s)*

5. 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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