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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. US10514223 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. US10514223 (the "US10514223 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

A technical analysis of U.S. Patent 10,514,223 reveals a novel firearm trigger mechanism designed to be retrofitted into existing semi-automatic firearm platforms. The patent details a system that utilizes the force of the firearm's cycling action to mechanically reset the trigger, a design that has been the subject of significant legal and commercial attention.

Title: Firearm trigger mechanism

Assignee: The patent was originally assigned to Wolf Tactical LLC. Records indicate a subsequent assignment to ABC IP, LLC, with Rare Breed Triggers, LLC holding exclusive licensing rights.

Inventor: Jeffrey Cooper Rounds

Filing Date: September 27, 2018

Issue Date: December 24, 2019

Abstract:...

## 4. Litigation History of the Patent

Public records reflect that the US10514223 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- ABC IP, LLC et al. v. BIG DADDY ENTERPRISES, INC. — 1:21-cv-00149 · Florida Northern

District Court · Unknown

- RARE BREED TRIGGERS, LLC et al. v. WIDE OPEN ENTERPRISES LLC et al. — 1:22-cv-00280 · Ohio Northern District Court · Unknown
- ABC IP, LLC et al. v. LAWRENCE DEGARMO et al. — 4:22-cv-00107 · Oklahoma Northern District Court · Unknown
- RARE BREED TRIGGERS, LLC et al. v. LAWRENCE DEGARMO et al. — 4:23-cv-00021 · Oklahoma Eastern District Court · Unknown
- RARE BREED TRIGGERS, INC. et al. v. ORION TACTICAL LLC et al. — 2:25-cv-00852 · Wisconsin Eastern District Court · Unknown
- RARE BREED TRIGGERS, INC. et al. v. B&T USA LLC et al. — 2:25-cv-04938 · Arizona District Court · Unknown
- RARE BREED TRIGGERS, INC. et al. v. PEAK TACTICAL LLC — 1:25-cv-00124 · Wyoming District Court · Unknown
- RARE BREED TRIGGERS, INC. et al. v. BOISE BLACK RIFLE LLC — 4:25-cv-00299 · Idaho District Court · Unknown
- *...and 12 additional case(s)*

### 3. 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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