

Wood Herron & Evans LLP

intellectual
property law

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April 1, 2025

Via USPS Priority Mail Express

Grey Market Research & Development, LLC
Attn: Legal Department
30 N. Gould Street, #43044
Sheridan, WY 82801

Grey Market Research & Development, LLC
c/o Registered Agents, Inc.
30 N Gould Street, Suite R.
Sheridan, WY 82801

Re: **Infringement of U.S. Patent No. 12,038,247**

Dear Sir/Ma'am,

This firm represents ABC IP, LLC ("ABC") in intellectual property matters. ABC is the owner of U.S. Patent No. 12,038,247 ("the '247 Patent") and others. Additional related patents are pending. A copy of the '247 Patent is enclosed for your reference. ABC holds numerous patents, including U.S. Patent No. 10,514,223, which has been exclusively licensed to Rare Breed Triggers LLC ("Rare Breed"), and successfully enforced against multiple infringers.

The '247 Patent covers a forced reset trigger with a cam movable between first and second positions to force the trigger to reset. It is an infringement to make, use, sell, offer to sell, or import any product covered by any claim of this patent in the United States, and all infringers in the chain of commerce are liable for full damages adequate to compensate for the infringement. 35 U.S.C. §§ 271 and 284. Additionally, anyone who actively induces or contributes to infringement is liable as an infringer. 35 U.S.C. §§ 271 and 284.

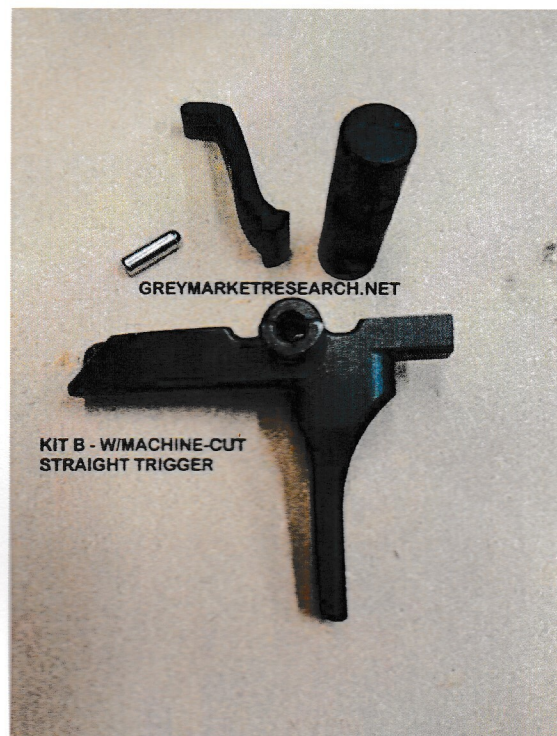
It has come to our attention that Grey Market Research & Development, LLC, d/b/a Grey Market Research, is selling or offering to sell what has come to be known as a "Super Safety" (3 Position) as shown below, via the Grey Market Research website (<https://greymarketresearch.net>), the Grey Market Research Facebook page (<https://www.facebook.com/profile.php?id=61561029839593>) and numerous private Facebook groups. When installed as instructed, the "Super Safety" (3 Position), regardless of its material



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Edmund P. Wood: 1923-1968 | Truman A. Herron: 1935-1976 | Edward B. Evans: 1936-1971

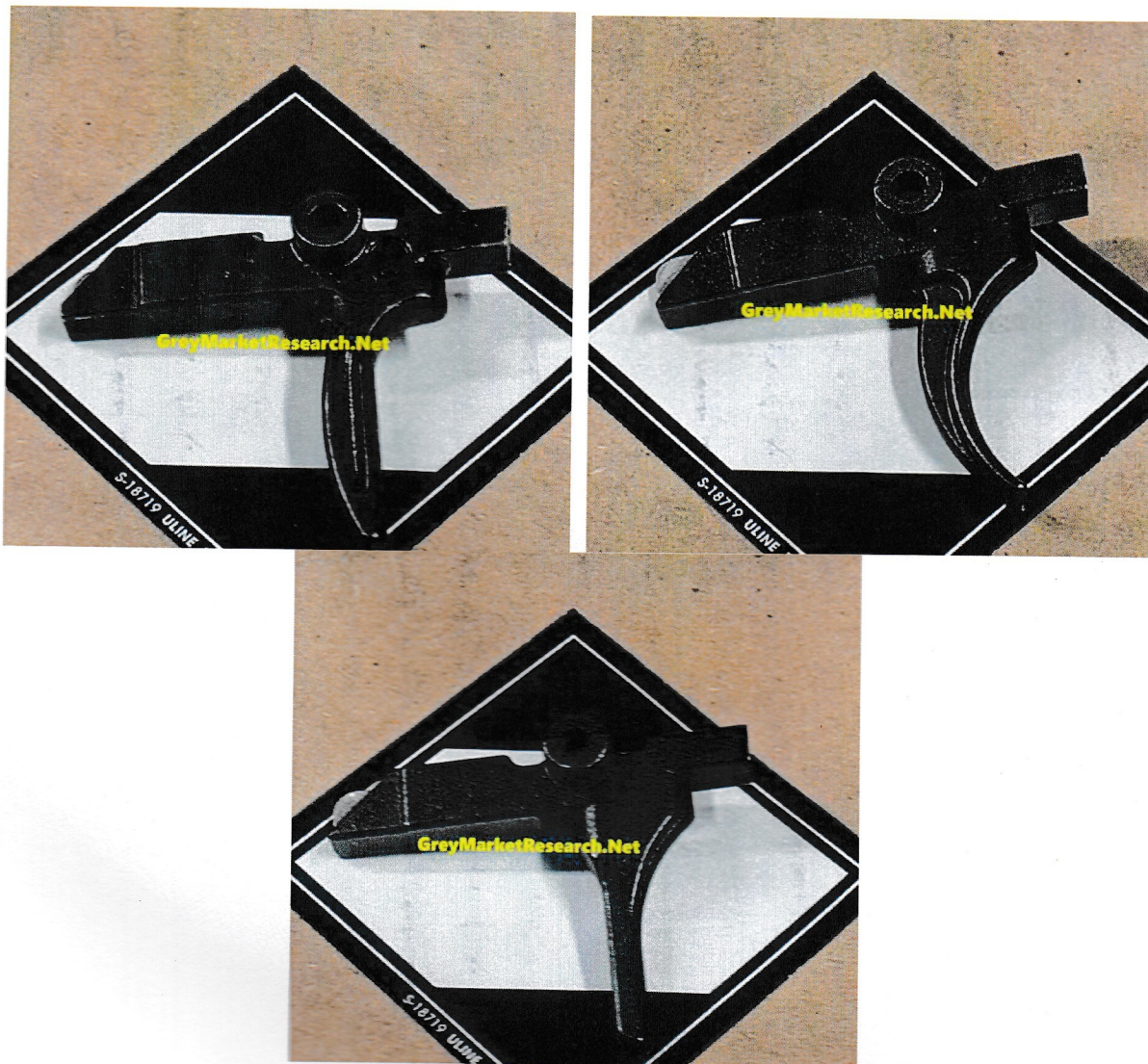
specs, color, or intended platform, is covered by at least claims 15 and 20 of the '247 Patent. Thus, use, manufacture, or sale constitutes an infringement of the '247 Patent.



We also see that you are selling or offering to sell precut triggers, which are specially designed **triggers for use with a "Super Safety" (3 Position)**. These precut triggers are not standard **components intended for use with a traditional fire control group**. Rather, they are specially designed and manufactured for use exclusively with the "Super Safety" (3 Position) device. You are offering these precut triggers not only for use with devices you have sold directly, but also for use with "Super Safety" products made or sold by others. As such, these components constitute a **material part of the invention claimed in the '247 Patent**, are not staple articles or commodities of commerce suitable for substantial noninfringing use, and are intended to be assembled into infringing devices. Your manufacture, sale, and offer for sale of these



precut triggers therefore constitutes contributory infringement under 35 U.S.C. § 271(c), and your conduct in facilitating their use with third-party “Super Safety” devices constitutes active inducement of infringement under 35 U.S.C. § 271(b). As such, you are fully liable for all resulting damages caused to the patent owner.



In addition, we see that you are selling or offering to sell modified AR-15 fire control groups, which have been modified for use with a “Super Safety” (3 Position)”. These modified AR-15 fire control groups are not standard components intended for use with a traditional safety selector. Rather, they are specially designed and manufactured for use exclusively with the “Super Safety” (3 Position) device. You are offering these modified AR-15 fire control groups not only for use with devices you have sold directly, but also for use with “Super Safety” products made or sold by others. As such, these components constitute a material part of the invention claimed in the ’247 Patent, are not staple articles or commodities of commerce suitable



for substantial noninfringing use, and are intended to be assembled into infringing devices. Your manufacture, sale, and offer for sale of these modified AR-15 fire control groups therefore constitutes contributory infringement under 35 U.S.C. § 271(c), and your conduct in facilitating their use with third-party “Super Safety” devices constitutes active inducement of infringement under 35 U.S.C. § 271(b). As such, you are fully liable for all resulting damages caused to the patent owner.



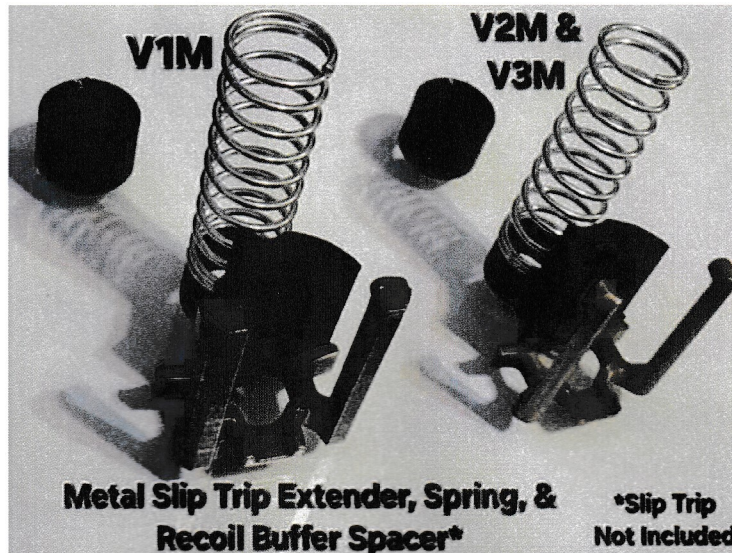
Further, you are also **selling or offering to sell two products** labeled “AR22LR Kit” and “AR22LR – Trip,” Stating: “This is a 3.5 lb drop-in cassette **CURVED** trigger that has been modified to be compatible with our standard push button.” Because your “AR22LR Kit” and “AR22LR – Trip” have been specifically manufactured so it can operate in conjunction with the **infringing “Super Safety” (3 Position) trigger device**. The addition of either of these components **is not incidental or optional** as it transforms the underlying product into an infringing assembly **that enables and facilitates unauthorized use of the “Super Safety” (3 Position) trigger device**. **The resulting combination is not a staple article or commodity of commerce suitable for substantial noninfringing use and is intended for integration with an infringing device**. Your manufacture, modification, sale, and offer for sale of these altered products therefore constitutes contributory infringement under 35 U.S.C. § 271(c), and your conduct in facilitating their use with “Super Safety” components constitutes active inducement of infringement under 35 U.S.C. § 271(b). You are fully liable for all resulting damages caused to the patent owner.





You are also selling or offering to sell two products called the “MP5 Slip Trip” and the “MP5 Slip Trip Extender”, which are not a standard component intended for use with a traditional MP5 fire control group. Rather, these two items are specially designed and manufactured for use exclusively with the “Super Safety” (3 Position) device in the MP5 platform. You are offering the “MP5 Slip Trip” and the “MP5 Slip Trip Extender” not only for use with devices you have sold directly, but also for use with “Super Safety” products made or sold by others. As such, the “MP5 Slip Trip” and the “MP5 Slip Trip Extender” constitute a material part of the invention claimed in the '247 Patent, are not staple articles or commodities of commerce suitable for substantial noninfringing use, and are intended to be assembled into an infringing device. Your manufacture, sale, and offer for sale of the “MP5 Slip Trip” and the “MP5 Slip Trip Extender” therefore constitute contributory infringement under 35 U.S.C. § 271(c), and your conduct in facilitating their use with third-party “Super Safety” devices constitute active inducement of infringement under 35 U.S.C. § 271(b). As such, you are fully liable for all resulting damages caused to the patent owner.





You are also selling or offering to sell “Stop Blocks/Centering Blocks”, which are specially designed parts exclusively used in conjunction with the cam lever of a “Super Safety” (3 Position). These “Stop Blocks/Centering Blocks” are not standard components intended for use with a traditional fire control group. Rather, they are specially designed and manufactured for use exclusively with the “Super Safety” (3 Position) device. You are offering these “Stop Blocks/Centering Blocks” not only for use with devices you have sold directly, but also for use with “Super Safety” products made or sold by others. As such, these “Stop Blocks/Centering Blocks” constitute a material part of the invention claimed in the '247 Patent, are not staple articles or commodities of commerce suitable for substantial noninfringing use, and are intended to be assembled into infringing devices. Your manufacture, sale, and offer for sale of these “Stop Blocks/Centering Blocks” therefore constitutes contributory infringement under 35 U.S.C. § 271(c), and your conduct in facilitating their use with third-party “Super Safety” devices constitutes active inducement of infringement under 35 U.S.C. § 271(b). As such, you are fully liable for all resulting damages caused to the patent owner.



And last, we see that you are also selling or offering to sell a product referred to as the “Trigger Cutting Jig.” These items are not standard tools or components intended for general use. Rather, they are specially designed and manufactured solely to assist others in modifying existing parts so they can be used in connection with the “Super Safety” (3 Position) device, resulting in an infringing assembly. The “Trigger Cutting Jig” serves no substantial noninfringing use and exists only to facilitate the creation of infringing devices. As such, these products constitute material parts of the invention claimed in the '247 Patent and are not staple articles or commodities of commerce. Your manufacture, sale, and offer for sale of the “Trigger Cutting Jig” therefore constitutes active inducement of infringement under 35 U.S.C. § 271(b). You are fully liable for all resulting damages caused to the patent owner.



Accordingly, we must demand that you immediately cease and desist from any further sale or offer to sell the “Super Safety” (3 Position), the precut triggers, the modified AR-15 fire control groups, the AR22LR Kit, the AR22LR – Trip, the MP5 Slip Trip, the “MP5 Slip Trip Extender, the Stop Blocks/Centering Blocks, the trigger cutting jig, or any other component part(s) or product(s) covered by or inducing infringement of the '247 Patent.

In order to negotiate a legal resolution without litigation, provide the following information:

- The number of units made or sold since July 16, 2024,
- The total revenue from the sale of each of these products,



- Identity and contact information for any wholesale purchasers, dealers, or resellers to whom you have sold these products, and
- If Grey Market Research did not manufacture all of these products or all of their components, identify the manufacturer from whom they were obtained and/or the vendor who supplied the components.

Knowing infringement or continuing to infringe after notice indicates willful infringement, which can incur a judgment of treble damages and/or payment of attorneys' fees in litigation. **Please confirm that you are immediately complying no later than April 16, 2025.**

Having been notified of this claim, you have a legal obligation to preserve all documents and records relating to your manufacture, sale, and offer for sale of these items. Spoliation of evidence can result in sanctions and/or legal inferences that the destroyed evidence was inculpatory.

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

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

Very truly yours,


Glenn D. Bellamy

Enclosure

cc: ABC IP, LLC

