

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

AOB PRODUCTS COMPANY,

Plaintiff,

vs.

THE ALLEN COMPANY, INC.,

Serve:

**George Cavanaugh,
609 S. 104th Street
Louisville, CO 80027**

Defendant.

Case No:

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff AOB Products Company ("AOB" or "Plaintiff") makes this Complaint against Defendant The Allen Company, Inc. ("Allen" or "Defendant"), demands a jury trial, and alleges as follows:

NATURE OF THE ACTION

1. This case is about Allen's repeated copying of AOB's patented products. Fundamentally, Allen has chosen to build its business on AOB's innovation. AOB's efforts to stop Allen's repeat infringements have been like whack-a-mole. Allen began by copying AOB's shooting targets. After AOB notified Allen that Allen's targets infringed AOB's patent, Allen changed its target design, but then AOB found that Allen copied AOB's patented target stands. After AOB notified Allen that Allen's target stands infringe AOB's patent, Allen seemed to wind down its sales of the target stands. However, Allen's infringement has only changed direction, and grown loftier, with Allen most recently embarking on infringement of AOB's shooting rests, one of AOB's most lucrative product lines. AOB brings this action to put an end to this unlawful game and Allen's willful infringement.

THE PARTIES

2. AOB is a Missouri corporation with its principal place of business at 1800 N. Route Z, Suite A, Columbia, MO 65202.

3. Upon information and belief, Allen is a Colorado corporation with its principal place of business at 609 South 104th Street, Louisville, CO 80027.

JURISDICTION AND VENUE

4. This action arises under the United States patent laws, 35 U.S.C. § 101 *et seq.*, including 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. § 1331 and § 1338(a).

5. This Court has personal jurisdiction over Allen because, upon information and belief, Allen resides in the State of Colorado as it is incorporated and organized under the laws of this State.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b) because, upon information and belief, Allen resides in this District and has its headquarters at 609 South 104th Street, Louisville, CO 80027.

AOB'S USE AND OWNERSHIP OF THE ASSERTED PATENTS

7. AOB is an industry leading provider of outdoor products and accessories encompassing hunting, fishing, camping, shooting, and personal security and defense products for rugged outdoor enthusiasts.

8. AOB produces innovative, top quality products under its brands BOG®; BUBBA®; Caldwell®; Crimson Trace®; Frankford Arsenal®; Grilla Grills®; Hooyman®; Imperial®; LaserLyte®; Lockdown®; MEAT!®; Old Timer®; Schrade®; Tipton®; Uncle Henry®; ust®; and Wheeler®.

9. AOB conceives, designs, produces and/or sources, and sells products and accessories, including shooting supplies, rests, vaults, targets, and other related accessories; lifestyle products such as premium sportsman knives and tools for fishing and hunting; land management tools for hunting preparedness; harvesting products for post-hunt or post-fishing activities; electro-optical devices, including hunting optics, firearm aiming devices, flashlights, and laser grips; reloading, gunsmithing, and firearm cleaning supplies; and survival, camping, and emergency preparedness products.

10. One of AOB's most established products is its LEAD SLED® branded shooting rests.

11. AOB understands and values intellectual property rights and owns in excess of 300 patents and pending patent applications, including the patent rights referred to in this Complaint, which AOB acquired from Battenfeld Technologies, Inc. ("Battenfeld").

12. AOB has 34 employees dedicated to research and development activities.

13. In fiscal years 2019, 2020, and 2021, AOB's gross spending on research and development activities relating to the development of new products was \$4.9 million, \$5.0 million, and \$5.4 million, respectively.

14. In or about 2003, Dennis Cauley, Tim Morrow and their co-inventors invented the LEAD SLED® shooting rests. The innovative LEAD SLED® shooting rests provide stability, precision and limit rearward movement of the firearm when it is fired to reduce recoil felt by the shooter.

15. Battenfeld obtained a family of patents directed to various innovative aspects of the LEAD SLED® shooting rests, as well as other shooting rest product lines, including U.S. Patent

Nos. 8,011,129 (the "'129 Patent"), 8,621,773 (the "'773 Patent"), 9,151,561 (the "'561 Patent"), 9,702,653 (the "'653 Patent"), and 10,859,336 (the "'336 Patent").

16. The '129 Patent, '773 Patent, '561 Patent, '653 Patent, and '336 Patent are also referred to as the "Shooting Rest Asserted Patents." A true and correct image of the LEAD SLED® 3 and LEAD SLED® DFT 2 shooting rests, which are commercial embodiments of the Shooting Rest Asserted Patents, appear below:



LEAD SLED® 3 shooting rest

LEAD SLED® DFT 2 shooting rest

17. In or about 2006, Robert Zara invented the Orange Peel® targets. The innovative Orange Peel® targets are designed for hits to be quickly and automatically marked in explosions of color so the shooter can quickly identify exactly where the bullet hit the target.

18. Battenfeld obtained U.S. Patent No. 7,631,877 (the "'877 Patent") directed to its Orange Peel® targets.

19. The '877 Patent is also referred to as the "Target Asserted Patent." A true and correct image of an Orange Peel® target, which is an embodiment covered by the Target Asserted Patent, appears below:



Orange Peel® Target

20. In or about 2011, Russell Potterfield, Robert Zara, and their co-inventors invented the Ultimate Target Stand. The innovative Ultimate Target Stand holds targets to be shot, is collapsible and designed to withstand wind.

21. Battenfeld obtained U.S. Patent No. 8,695,985 (the "'985 Patent") directed to features embodied in its Ultimate Target Stand.

22. The '985 Patent is also referred to as the "Target Stand Asserted Patent." A true and correct image of an Ultimate Target Stand, which is a commercial embodiment covered by the Target Stand Asserted Patent, appears below:



Ultimate Target Stand

23. The Shooting Rest, Target, and Target Stand Asserted Patents, are collectively referred to as the "Asserted Patents."

24. This patented technology and Battenfeld's rights in the Asserted Patents were a game-changer for Battenfeld, differentiating it from the competition, and an important factor in AOB's acquisition of Battenfeld's assets.

25. The exclusive position and innovation encompassed by the Asserted Patents, continues to be an important asset for AOB in its product lines of shooting rests, target stands, and targets.

26. AOB is the current owner of the Asserted Patents and all associated rights of exclusivity.

27. AOB's position is now threatened by Allen's injection of its infringing copycat products into the market.

28. Allen embarked on a coordinated campaign of infringing AOB's patented designs. Imitation is not innovation, and willful infringement of a competitor's intellectual property is not a legitimate business plan.

29. Accordingly, AOB brings this action for patent infringement to stop Allen from infringing its patent rights.

THE '129 PATENT

30. U.S. Patent Number 8,011,129 B2 (the "'129 Patent") is entitled "Recoil-Reducing Shooting Rest." The '129 Patent was filed on June 10, 2004, as U.S. Pat. App. No. 10/865,595. The '129 Patent was duly and legally issued on September 6, 2011, by the United States Patent and Trademark Office.

31. A true and correct copy of the '129 Patent is attached to this Complaint as Exhibit A.

32. AOB is the owner and assignee of the '129 Patent and possesses all rights of recovery under the '129 Patent.

33. The '129 Patent has not expired and is in full force and effect.

34. The '129 Patent claims are valid and enforceable.

35. The Abstract of the '129 Patent states: "A shooting rest supports a firearm and reduces recoil energy of the firearm. The shooting rest has a rear support and a front support for supporting the firearm and a frame connecting the rear support and the front support. The frame supports at least one weight to reduce the amount of recoil energy felt by a shooter."

36. A Certificate of Correction for the '129 Patent issued on March 24, 2015 making substantial corrections to the claims.

THE '877 PATENT

37. U.S. Patent Number 7,631,877 B2 (the "'877 Patent") is entitled "Firearm Targets and Methods." The '877 Patent was filed on January 26, 2006, as U.S. Pat. App. No. 11/339,863. The '877 Patent was duly and legally issued on December 15, 2009, by the United States Patent and Trademark Office.

38. A true and correct copy of the '877 Patent is attached to this Complaint as Exhibit B.

39. AOB is the owner and assignee of the '877 Patent and possesses all rights of recovery under the '877 Patent.

40. The '877 Patent has not expired and is in full force and effect.

41. The '877 Patent claims are valid and enforceable.

42. The Abstract of the '877 Patent states: "Firearm targets and methods for manufacturing firearm targets are disclosed herein. In one embodiment, a target includes a substrate, a release layer on the substrate, and an ink layer on the release layer such that the release layer is positioned between the ink layer and the substrate. The ink layer at least partially defines a target image. The ink layer has a first section with a first color and a second section with a second color different than the first color."

THE '773 PATENT

43. U.S. Patent Number 8,621,773 B2 (the "'773 Patent") is entitled "Shooting Rests for Supporting Firearms." The '773 Patent was filed on May 10, 2006, as U.S. Pat. App. No. 11/431,956. The '773 Patent was duly and legally issued on January 7, 2014, by the United States Patent and Trademark Office.

44. A true and correct copy of the '773 Patent is attached to this Complaint as Exhibit C.

45. AOB is the owner and assignee of the '773 Patent and possesses all rights of recovery under the '773 Patent.

46. The '773 Patent has not expired and is in full force and effect.

47. The '773 Patent claims are valid and enforceable.

48. The Abstract of the '773 Patent states: "One aspect of the invention is directed to shooting rests for supporting a firearm having a first portion and a second portion rearward of the first portion. In one embodiment, a shooting rest includes a frame, a front support for supporting the first portion of the firearm, a support member for carrying one or more weights, and a stop for inhibiting rearward movement of the firearm relative to the shooting rest. The front support is coupled to the frame, and the support member is positioned at least proximate to the frame. The stop includes a flexible portion and is also coupled to the frame."

THE '985 PATENT

49. U.S. Patent Number 8,695,985 B2 (the "'985 Patent") is entitled "Stowable Shooting Target Assemblies." The '985 Patent was filed on January 7, 2011, as U.S. Pat. App. No. 12/986,959. The '985 Patent was duly and legally issued on April 15, 2014, by the United States Patent and Trademark Office.

50. A true and correct copy of the '985 Patent is attached to this Complaint as Exhibit D.

51. AOB is the owner and assignee of the '985 Patent and possesses all rights of recovery under the '985 Patent.

52. The '985 Patent has not expired and is in full force and effect.

53. The '985 Patent claims are valid and enforceable.

54. The Abstract of the '985 Patent states: "The present disclosure describes various embodiments of shooting target assemblies and associated systems and methods of use and manufacture. One aspect of the disclosure is directed to shooting target assemblies configurable in an assembled arrangement and a stowed arrangement. Another aspect of the disclosure is directed to shooting target assemblies having a stabilizer for improving target stability during operation."

THE '561 PATENT

55. U.S. Patent Number 9,151,561 B2 (the "'561 Patent") is entitled "Shooting Rests for Supporting Firearms." The '561 Patent was filed on January 3, 2014, as U.S. Pat. App. No. 14/146,960. The '561 Patent was duly and legally issued on October 6, 2015, by the United States Patent and Trademark Office.

56. A true and correct copy of the '561 Patent is attached to this Complaint as Exhibit E.

57. AOB is the owner and assignee of the '561 Patent and possesses all rights of recovery under the '561 Patent.

58. The '561 Patent has not expired and is in full force and effect.

59. The '561 Patent claims are valid and enforceable.

60. The Abstract of the '561 Patent states: "One aspect of the invention is directed to shooting rests for supporting a firearm having a first portion and a second portion rearward of the first portion. In one embodiment, a shooting rest includes a frame, a front support for supporting the first portion of the firearm, a support member for carrying one or more weights, and a stop for inhibiting rearward movement of the firearm relative to the shooting rest. The front support is

coupled to the frame, and the support member is positioned at least proximate to the frame. The stop includes a flexible portion and is also coupled to the frame."

THE '653 PATENT

61. U.S. Patent Number 9,702,653 B2 (the "'653 Patent") is entitled "Firearm Shooting Rest." The '653 Patent was filed on October 9, 2015, as U.S. Pat. App. No. 14/879,706. The '653 Patent was duly and legally issued on July 11, 2017, by the United States Patent and Trademark Office.

62. A true and correct copy of the '653 Patent is attached to this Complaint as Exhibit F.

63. AOB is the owner and assignee of the '653 Patent and possesses all rights of recovery under the '653 Patent.

64. The '653 Patent has not expired and is in full force and effect.

65. The '653 Patent claims are valid and enforceable.

66. The Abstract of the '653 Patent states: "Shooting rests and associated methods of manufacture and use. A rear support of a shooting rest includes a stop configured to inhibit rearward movement of a firearm when the firearm is supported on the rest and fired. The stop supports a recoil pad for cushioning recoil of the firearm."

THE '336 PATENT

67. U.S. Patent Number 10,859,336 B2 (the "'336 Patent") is entitled "Shooting Rests for Supporting Firearms." The '336 Patent was filed on June 10, 2019, as U.S. Pat. App. No. 16/435,671. The '336 Patent was duly and legally issued on December 8, 2020, by the United States Patent and Trademark Office.

68. A true and correct copy of the '336 Patent is attached to this Complaint as Exhibit G.

69. AOB is the owner and assignee of the '336 Patent and possesses all rights of recovery under the '336 Patent.

70. The '336 Patent has not expired and is in full force and effect.

71. The '336 Patent claims are valid and enforceable.

72. The Abstract of the '336 Patent states: "One aspect of the invention is directed to shooting rests for supporting a firearm having a first portion and a second portion rearward of the first portion. In one embodiment, a shooting rest includes a frame, a front support for supporting the first portion of the firearm, a support member for carrying one or more weights, and stop for inhibiting rearward movement of the firearm relative to the shooting rest. The front support is coupled to the frame, and the support member is positioned at least proximate to the frame."

ALLEN'S WILLFUL INFRINGEMENT OF THE ASSERTED PATENTS

73. Allen is infringing and/or has infringed the Asserted Patents with at least its Shottrax and Shot-Rock shooting rests, EZ Aim targets, and Precision Target Stand (the "Accused Products").

74. The Shottrax and Shot-Rock shooting rests are also referred to as the "Accused Shooting Rests." True and accurate images of two embodiments of the Accused Shooting Rests appear below:

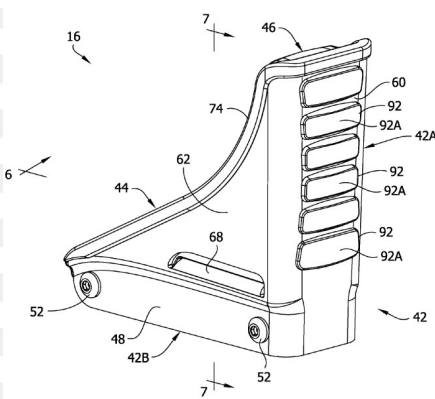


Shottrax Recoil Reducing Rest



Shot-Rock Recoil Reducing Rest

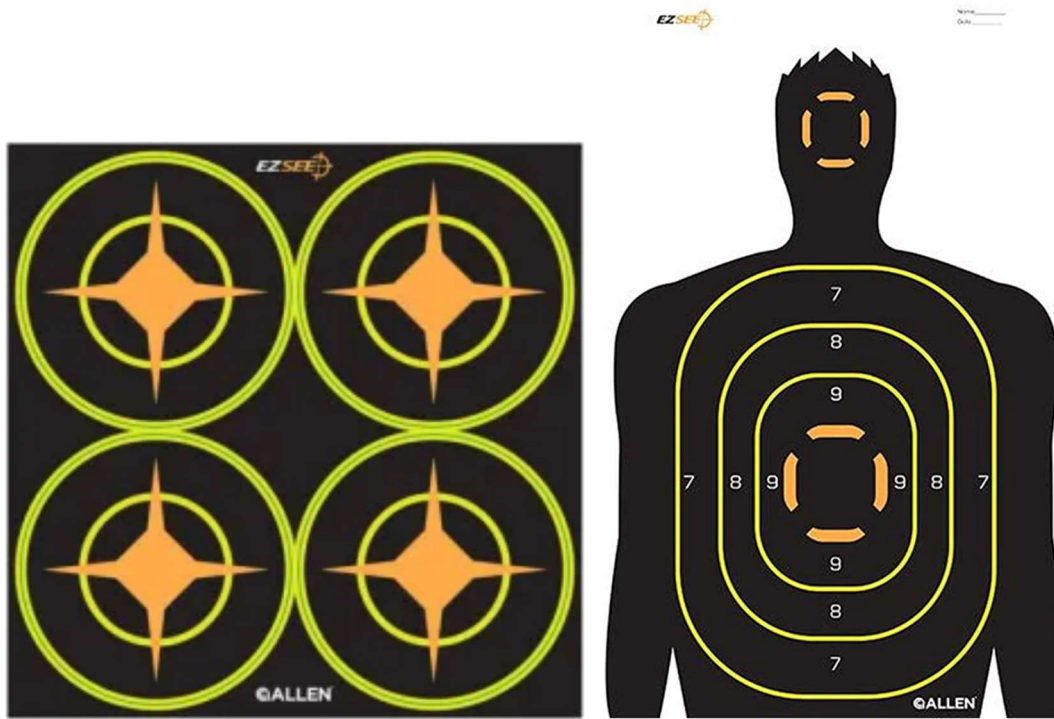
75. As an example of Allen's blatant copying of features of AOB's Shooting Rest Products covered by AOB's Shooting Rest Asserted Patents, reproduced below is a true and accurate image of a back of AOB's rear firearm support showing six recoil pad connecting protrusions exposed on the back of the firearm stop, alongside FIG. 3 of the '653 Patent illustrating same, and alongside a true and accurate image of a back of Allen's Shottrax rear firearm support including two recoil pad connecting protrusions exposed on the back of the firearm stop. The connecting protrusions are subject matter recited in at least claims 1, 19, and 23 of the '653 Patent.



76. The EZ Aim targets are also referred to as the "Accused Targets." The Accused Targets include, but are not limited to, the EZ Aim Splash Adhesive Aiming Dots 3" (SKU #15253), EZ Aim Splash Adhesive Bullseye Target 12" (SKU #15222), EZ Aim Splash Adhesive

Grid Target 12" (SKU #15224), and EZ Aim Splash Silhouette Target 12x18" (SKU #15229).

True and accurate images of two examples of the Accused Targets appear below:



EZ Aim Splash Adhesive Aiming Dots 3"

EZ Aim Splash Silhouette Target 12x18"

77. The Precision Target Stand is also referred to as the "Accused Target Stand." A true and correct image of the Accused Target Stand appears below:



Precision Target Stand

78. Allen manufactures, distributes, and sells its infringing Accused Products without the permission or authorization of AOB.

79. Upon information and belief, Defendant's Accused Products were designed to compete in the market with AOB's LEAD SLED® shooting rests, Orange Peel® and other AOB patented targets, and Ultimate Target Stand.

80. Upon information and belief, Defendant's efforts are directly targeted to take market share from AOB.

81. Allen is promoting or has promoted its Accused Products to the same retailers, distributors, and consumers served by AOB, including marketing the Accused Products at multiple industry trade shows attended by AOB.

82. Defendant's Accused Products are aimed at displacing AOB's products in the market in light of the few market participants and niche nature of the market.

83. Any sale by Defendant of the Accused Products likely displaces a sale of AOB's patented products.

84. Allen apparently hopes to capitalize on the goodwill and reputation of AOB by misappropriating AOB's valuable intellectual property, including the Asserted Patents granted for innovative products.

85. Upon information and belief, AOB has lost and is losing customers and has experienced incalculable erosion to its goodwill and reputation. If Allen is allowed to continue marketing and promoting its Accused Products, then AOB will continue to suffer irreparable harm, including loss of sales, market share, profit and goodwill. In short, AOB's innovative LEAD SLED® shooting rests, Orange Peel® targets, and Ultimate Target Stand product lines, market success and accompanying patent rights are threatened.

86. AOB complies with the marking requirements of 35 U.S.C. § 287 related to its products under the Asserted Patents including by way of its virtual patent marking website at <https://www.aob.com/patents/>.

87. AOB is a well-known competitive manufacturer of branded outdoor products and equipment.

88. Upon information and belief, Allen is well aware of AOB's patent rights in the Asserted Patents.

89. Upon information and belief, at least as early as 2018, Allen was advertising one or more of the Accused Targets for sale.

90. Upon information and belief, at least as early as 2019, Allen was advertising the Accused Target Stand for sale.

91. Upon information and belief, at least as early as 2020, Allen was advertising one or more of the Accused Shooting Rests for sale.

92. In July 2018, AOB informed Allen by letter that its Accused Targets were infringing the '877 Patent. The letter demanded that Allen cease and desist from any further manufacture, use, import, sale, or offer for sale of the targets infringing AOB's patent rights. Allen failed to respond to this letter. After AOB followed up with Allen in 2019, Allen and AOB exchanged correspondence pertaining to Allen's infringement of the '877 Patent.

93. Without resolution, Allen stopped responding to AOB despite AOB's several additional attempts to contact Allen extending into 2020.

94. In June 2019, AOB informed Allen by letter that its Accused Target Stand was infringing the '985 Patent. The letter demanded that Allen cease and desist from any further manufacture, use, import, sale, or offer for sale of the targets infringing AOB's patent rights. Allen failed to respond to this letter despite several attempts by AOB to follow up with Allen extending into 2020. Allen seemingly stopped selling the Accused Target Stand after selling off its inventory.

95. On information and belief, Allen has inspected the Accused Shooting Rests and is fully aware its actions infringe the Asserted Patents given its past history of AOB warning Allen about its patent rights, Allen's monitoring of AOB's product lines, and given that AOB complies with the patent marking requirements, such that Allen's monitoring and inspection of AOB's product line would have made Allen aware of AOB's patent rights in its shooting rest products.

96. This action seeks damages and permanent injunctive relief for Defendant Allen's acts of making, using, selling, offering for sale and/or importing its Accused Products that infringe the Asserted Patents.

COUNT 1

INFRINGEMENT OF U.S. PATENT NO. 7,631,877 B2

97. AOB realleges and incorporates by reference the foregoing paragraphs of this Complaint as though fully set forth herein.

98. Defendant, without license or authorization to do so, has infringed one or more claims of the '877 Patent, and continues to infringe, literally or under the doctrine of equivalents, one or more claims the '877 Patent by making, using, selling, offering for sale, and/or importing the Accused Targets within the United States, in violation of 35 U.S.C. § 271(a).

99. Allen by making, using, selling, offering for sale, and/or importing the Accused Targets directly infringes the '877 Patent. For example, Allen's making, using, importing, and sale of the Accused Targets infringes at least claims 1, 12, and 13 of the '877 Patent.

100. Allen was objectively aware of, and had knowledge of, the '877 Patent at least as early as July 2018, when AOB sent a letter notifying Allen of the same.

101. Allen has committed and continues to commit acts of infringement under 35 U.S.C. § 271 by making using, importing, offering to sell, and/or selling its Accused Targets. In committing these acts of infringement, Allen acted despite having knowledge of the '877 Patent and knowledge that its actions constituted infringement of at least one valid and enforceable claim of the '877 Patent.

102. Allen acted with knowledge of the '877 Patent and despite an objectively high likelihood that its actions constituted infringement of at least one valid and enforceable claim of the '877 Patent, and Allen knew or should have known that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable claim of the '877 Patent.

103. Allen's infringement of the '877 Patent has been knowing and willful.

104. Allen's infringement and behavior was egregious in light of the notice provided by AOB.

105. As a direct and proximate result of Allen's acts of infringement, AOB has suffered and continues to suffer damages and irreparable harm.

106. AOB has no adequate remedy at law for Allen's acts of infringement and unless Allen's acts of infringement are enjoined, AOB will continue to be damaged and irreparably harmed.

COUNT 2
INFRINGEMENT OF U.S. PATENT NO. 8,011,129 B2

107. AOB realleges and incorporates by reference the foregoing paragraphs of this Complaint as though fully set forth herein.

108. Defendant, without license or authorization to do so, has directly infringed, induced infringement of and contributorily infringed one or more claims of the '129 Patent, and continues to infringe, literally or under the doctrine of equivalents, one or more claims the '129 Patent by making, using, selling, offering for sale, and/or importing the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(a).

109. Allen by assembling the Accused Shooting Rests directly infringes the '129 Patent. For example, Allen's assembly of the Accused Shooting Rests infringes at least claim 1, 12, 17, 22, and 27 of the '129 Patent.

110. Allen's website and other advertising and marketing materials show the Accused Shooting Rest Products fully assembled, and thus show direct infringement. On information and belief, it is reasonable to infer that Allen also fully assembles these products for use in its design processes, testing, quality assurance, sales training, trade show presentations, and other industry standard activities.

111. Allen, without license or authorization to do so, has also indirectly infringed the '129 Patent. Allen has actively induced infringement of one or more claims of the '129 Patent, and

continues to actively induce infringement of one or more claims the '129 Patent, by inducing third parties (e.g., customers or end users) to assemble the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(b).

112. The third parties' assembly of the Accused Shooting Rests also directly infringes the '129 Patent. For example, the third parties' assembly of the Accused Shooting Rests infringes at least claims 1, 12, 17, 22, and 27 of the '129 Patent.

113. Allen has induced and is continuing to induce third parties to infringe the '129 Patent, including by selling components of the Accused Shooting Rests to third parties and facilitating, training, supporting, teaching, directing, or instructing the third parties to assemble the Accused Shooting Rests knowing that such assembly of the Accused Shooting Rests infringes at least claims 1, 12, 17, 22, and 27 of the '129 Patent. Allen sells components of the Accused Shooting Rests together with instruction materials specifically instructing third parties to assemble the Accused Shooting Rests in a way that directly infringes the '129 Patent.

114. Allen has induced and is inducing third parties to directly infringe the '129 Patent by assembling the Accused Shooting Rests with specific intent to cause the third parties to assemble the Accused Shooting Rests in a manner that infringes at least claim 1, 12, 17, 22, and 27 of the '129 Patent.

115. Upon information and belief, Allen possessed specific intent to induce direct infringement of at least claims 1, 12, 17, 22, and 27 of the '129 Patent by its customers and/or end users that assemble the Accused Shooting Rests.

116. Such steps by Allen include, among other things, advising, supporting, and directing customers and end users to assemble the Accused Shooting Rests in an infringing

manner, and/or distributing and providing instructions, terms of use, training, or advertising, that guide others to assemble the Accused Shooting Rests in an infringing manner.

117. Allen was objectively aware of, and had knowledge of, the '129 Patent due to AOB's past warnings about patent infringement, the public nature of AOB's Asserted Shooting Rest Patents, AOB's well known LEAD SLED products and market share, AOB's compliance with the marking statute identifying the Asserted Shooting Rest Patents, and Allen's demonstrated continuous monitoring of AOB's product line or was willfully blind to the fact that AOB owned the Asserted Shooting Rest Patents and that the Accused Shooting Rest Products infringed AOB's patent rights.

118. On information and belief, these facts create a reasonable inference that Allen had actual knowledge it was infringing AOB's Asserted Shooting Rest Patents or subjectively believed this to be the case and willfully chose to remain ignorant of the underlying facts behind AOB's patent rights and Allen's infringement of those rights.

119. Allen has also contributed to the infringement of the '129 Patent under 35 U.S.C. § 271(c) by importing, offering to sell, selling, and/or inducing the assembly of the Accused Shooting Rests within the United States knowing that the components of the Accused Shooting Rests were especially made or adapted for assembly in a manner that infringes at least claim 1, 12, 17, 22, and 27 of the '129 Patent.

120. The components of the Accused Shooting Rests sold by Allen are material to practicing the claimed apparatus and are not staple articles or commodities of commerce suitable for substantial non-infringing use.

121. Allen has committed and continues to commit acts of infringement under 35 U.S.C. § 271 by making using, importing, offering to sell, and/or selling its Accused Shooting Rests and

teaching, instructing, training, guiding, and directing its customers and end users on the assembly of the Accused Shooting Rests. In committing these acts of infringement, Allen acted despite having knowledge or willful blindness of the '129 Patent and knowledge or willful blindness that its actions constituted infringement of at least one valid and enforceable claim of the '129 Patent.

122. Allen acted with knowledge or willful blindness of the '129 Patent and despite an objectively and subjectively high likelihood that its actions constituted infringement of at least one valid and enforceable claim of the '129 Patent or willful blindness of same, and Allen knew or should have known or was willfully blind that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable claim of the '129 Patent.

123. As a direct and proximate result of Allen's acts of infringement, AOB has suffered and continues to suffer damages and irreparable harm.

124. AOB has no adequate remedy at law for Allen's acts of infringement and unless Allen's acts of infringement are enjoined, AOB will continue to be damaged and irreparably harmed.

COUNT 3
INFRINGEMENT OF U.S. PATENT NO. 8,621,773 B2

125. AOB realleges and incorporates by reference the foregoing paragraphs of this Complaint as though fully set forth herein.

126. Defendant, without license or authorization to do so, has directly infringed, induced infringement of and contributorily infringed one or more claims of the '773 Patent, and continues to infringe, literally or under the doctrine of equivalents, one or more claims the '773 Patent by making, using, selling, offering for sale, and/or importing the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(a).

127. Allen by assembling the Accused Shooting Rests directly infringes the '773 Patent. For example, Allen's assembly of the Accused Shooting Rests infringes at least claim 1 of the '773 Patent.

128. Allen's website and other advertising and marketing materials show the Accused Shooting Rest Products fully assembled, and thus show direct infringement. On information and belief, it is reasonable to infer that Allen also fully assembles these products for use in its design processes, testing, quality assurance, sales training, trade show presentations, and other industry standard activities.

129. Allen, without license or authorization to do so, has also indirectly infringed the '773 Patent. Allen has actively induced infringement of one or more claims of the '773 Patent, and continues to actively induce infringement of one or more claims the '773 Patent, by inducing third parties (e.g., customers or end users) to assemble the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(b).

130. The third parties' assembly of the Accused Shooting Rests also directly infringes the '773 Patent. For example, the third parties' assembly of the Accused Shooting Rests infringes at least claim 1 of the '773 Patent.

131. Allen has induced and is continuing to induce third parties to infringe the '773 Patent, including by selling components of the Accused Shooting Rests to third parties and facilitating, training, supporting, teaching, directing, or instructing the third parties to assemble the Accused Shooting Rests knowing that such assembly of the Accused Shooting Rests infringes at least claim 1 of the '773 Patent. Allen sells components of the Accused Shooting Rests together with instruction materials specifically instructing third parties to assemble the Accused Shooting Rests in a way that directly infringes the '773 Patent.

132. Allen has induced and is inducing third parties to directly infringe the '773 Patent by assembling the Accused Shooting Rests with specific intent to cause the third parties to assemble the Accused Shooting Rests in a manner that infringes at least claim 1 of the '773 Patent.

133. Upon information and belief, Allen possessed specific intent to induce direct infringement of at least claim 1 of the '773 Patent by its customers and/or end users that assemble the Accused Shooting Rests.

134. Such steps by Allen include, among other things, advising, supporting, and directing customers and end users to assemble the Accused Shooting Rests in an infringing manner, and/or distributing and providing instructions, terms of use, training, or advertising, that guide others to assemble the Accused Shooting Rests in an infringing manner.

135. Allen was objectively aware of, and had knowledge of, the '773 Patent due to AOB's past warnings about patent infringement, the public nature of AOB's Asserted Shooting Rest Patents, AOB's well known LEAD SLED products and market share, AOB's compliance with the marking statute identifying the Asserted Shooting Rest Patents, and Allen's demonstrated continuous monitoring of AOB's product line or was willfully blind to the fact the AOB owned the Asserted Shooting Rest Patents and that the Accused Shooting Rest Products infringed AOB's patent rights.

136. On information and belief, these facts create a reasonable inference that Allen had actual knowledge it was infringing AOB's Asserted Shooting Rest Patents or subjectively believed this to be the case and willfully chose to remain ignorant of the underlying facts behind AOB's patent rights and Allen's infringement of those rights.

137. Allen has also contributed to the infringement of the '773 Patent under 35 U.S.C. § 271(c) by importing, offering to sell, selling, and/or inducing the assembly of the Accused

Shooting Rests within the United States knowing that the components of the Accused Shooting Rests were especially made or adapted for assembly in a manner that infringes at least claim 1 of the '773 Patent.

138. The components of the Accused Shooting Rests sold by Allen are material to practicing the claimed apparatus and are not staple articles or commodities of commerce suitable for substantial non-infringing use.

139. Allen has committed and continues to commit acts of infringement under 35 U.S.C. § 271 by making using, importing, offering to sell, and/or selling its Accused Shooting Rests and teaching, instructing, training, guiding, and directing its customers and end users on the assembly of the Accused Shooting Rests. In committing these acts of infringement, Allen acted despite having knowledge or willful blindness of the '773 Patent and knowledge or willful blindness that its actions constituted infringement of at least one valid and enforceable claim of the '773 Patent.

140. Allen acted with knowledge or willful blindness of the '773 Patent and despite an objectively and subjectively high likelihood that its actions constituted infringement of at least one valid and enforceable claim of the '773 Patent or willful blindness of same, and Allen knew or should have known or was willfully blind that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable claim of the '773 Patent.

141. As a direct and proximate result of Allen's acts of infringement, AOB has suffered and continues to suffer damages and irreparable harm.

142. AOB has no adequate remedy at law for Allen's acts of infringement and unless Allen's acts of infringement are enjoined, AOB will continue to be damaged and irreparably harmed.

COUNT 4
INFRINGEMENT OF U.S. PATENT NO. 8,695,985 B2

143. AOB realleges and incorporates by reference the foregoing paragraphs of this Complaint as though fully set forth herein.

144. Defendant, without license or authorization to do so, has infringed one or more claims of the '985 Patent, and continues to infringe, literally or under the doctrine of equivalents, one or more claims the '985 Patent by making, using, selling, offering for sale, and/or importing the Accused Target Stand within the United States, in violation of 35 U.S.C. § 271(a).

145. Allen by assembling the Accused Target Stand directly infringes the '985 Patent. For example, Allen's assembly of the Accused Target Stand infringes at least claim 1 of the '985 Patent.

146. Allen, without license or authorization to do so, has also indirectly infringed the '985 Patent. Allen has actively induced infringement of one or more claims of the '985 Patent, and continues to actively induce infringement of one or more claims the '985 Patent, by inducing third parties (e.g., customers or end users) to assemble the Accused Target Stand within the United States, in violation of 35 U.S.C. § 271(b).

147. The third parties' assembly of the Accused Target Stand infringes the '985 Patent. For example, the third parties' assembly of the Accused Target Stand infringes at least claim 1 of the '985 Patent.

148. Allen has induced and is continuing to induce third parties to infringe the '985 Patent, including by selling components of the Accused Target Stand to third parties and facilitating, training, supporting, teaching, directing, or instructing the third parties to assemble the Accused Target Stand knowing that such assembly of the Accused Target Stand infringes at least claim 1 of the '985 Patent. Allen sells components of the Accused Target Stand together with

instruction materials instructing third parties to assemble the Accused Target Stand in a way that infringes the '985 Patent.

149. Allen has induced and is inducing third parties to directly infringe the '985 Patent by assembling the Accused Target Stand with specific intent to cause the third parties to assemble the Accused Target Stand in a manner that infringes at least claim 1 of the '985 Patent.

150. Upon information and belief, Allen possessed specific intent to induce direct infringement of at least claim 1 of the '985 Patent by its customers and/or end users that assemble the Accused Target Stand.

151. Such steps by Allen include, among other things, advising, supporting, and directing customers and end users to assemble the Accused Target Stand in an infringing manner, and/or distributing and providing instructions, terms of use, training, or advertising, that guide others to assemble the Accused Target Stand in an infringing manner.

152. Allen was objectively aware of, and had knowledge of, the '985 Patent at least as early as June 2019, when AOB sent a letter notifying Allen of the same.

153. Allen has also contributed to the infringement of the '985 Patent under 35 U.S.C. § 271(c) by importing, offering to sell, selling, and/or inducing the assembly of the Accused Target Stand within the United States knowing that the components of the Accused Target Stand were especially made or adapted for assembly in a manner that infringes at least claim 1 of the '985 Patent.

154. The components of the Accused Target Stand sold by Allen are material to practicing the claimed method and are not staple articles or commodities of commerce suitable for substantial non-infringing use.

155. Allen has committed and continues to commit acts of infringement under 35 U.S.C. § 271 by making using, importing, offering to sell, and/or selling its Accused Target Stand and teaching, instructing, training, guiding, and directing its customers and end users on the assembly of the Accused Target Stand. In committing these acts of infringement, Allen acted despite having knowledge of the '985 Patent and knowledge that its actions constituted infringement of at least one valid and enforceable claim of the '985 Patent.

156. Allen acted with knowledge of the '985 Patent and despite an objectively high likelihood that its actions constituted infringement of at least one valid and enforceable claim of the '985 Patent, and Allen knew or should have known that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable claim of the '985 Patent.

157. Allen's infringement of the '985 Patent has been knowing and willful.

158. Allen's infringement and behavior was egregious in light of the notice provided by AOB.

159. As a direct and proximate result of Allen's acts of infringement, AOB has suffered and continues to suffer damages and irreparable harm.

160. AOB has no adequate remedy at law for Allen's acts of infringement and unless Allen's acts of infringement are enjoined, AOB will continue to be damaged and irreparably harmed.

COUNT 5
INFRINGEMENT OF U.S. PATENT NO. 9,151,561 B2

161. AOB realleges and incorporates by reference the foregoing paragraphs of this Complaint as though fully set forth herein.

162. Defendant, without license or authorization to do so, has directly infringed, induced infringement of and contributorily infringed one or more claims of the '561 Patent, and continues

to infringe, literally or under the doctrine of equivalents, one or more claims the '561 Patent by making, using, selling, offering for sale, and/or importing the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(a).

163. Allen by assembling the Accused Shooting Rests directly infringes the '561 Patent. For example, Allen's assembly of the Accused Shooting Rests infringes at least claim 1 of the '561 Patent.

164. Allen's website and other advertising and marketing materials show the Accused Shooting Rest Products fully assembled, and thus show direct infringement. On information and belief, it is reasonable to infer that Allen also fully assembles these products for use in its design processes, testing, quality assurance, sales training and other industry standard activities.

165. Allen, without license or authorization to do so, has also indirectly infringed the '561 Patent. Allen has actively induced infringement of one or more claims of the '561 Patent, and continues to actively induce infringement of one or more claims the '561 Patent, by inducing third parties (e.g., customers or end users) to assemble the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(b).

166. The third parties' assembly of the Accused Shooting Rests also directly infringes the '561 Patent. For example, the third parties' assembly of the Accused Shooting Rests infringes at least claim 1 of the '561 Patent.

167. Allen has induced and is continuing to induce third parties to infringe the '561 Patent, including by selling components of the Accused Shooting Rests to third parties and facilitating, training, supporting, teaching, directing, or instructing the third parties to assemble the Accused Shooting Rests knowing that such assembly of the Accused Shooting Rests infringes at least claim 1 of the '561 Patent. Allen sells components of the Accused Shooting Rests together

with instruction materials specifically instructing third parties to assemble the Accused Shooting Rests in a way that directly infringes the '561 Patent.

168. Allen has induced and is inducing third parties to directly infringe the '561 Patent by assembling the Accused Shooting Rests with specific intent to cause the third parties to assemble the Accused Shooting Rests in a manner that infringes at least claim 1 of the '561 Patent.

169. Upon information and belief, Allen possessed specific intent to induce direct infringement of at least claim 1 of the '561 Patent by its customers and/or end users that assemble the Accused Shooting Rests.

170. Such steps by Allen include, among other things, advising, supporting, and directing customers and end users to assemble the Accused Shooting Rests in an infringing manner, and/or distributing and providing instructions, terms of use, training, or advertising, that guide others to assemble the Accused Shooting Rests in an infringing manner.

171. Allen was objectively aware of, and had knowledge of, the '561 Patent due to AOB's past warnings about patent infringement, the public nature of AOB's Asserted Shooting Rest Patents, AOB's well known LEAD SLED products and market share, AOB's compliance with the marking statute identifying the Asserted Shooting Rest Patents, and Allen's demonstrated continuous monitoring of AOB's product line or was willfully blind to the fact the AOB owned the Asserted Shooting Rest Patents and that the Accused Shooting Rest Products infringed AOB's patent rights.

172. On information and belief, these facts create a reasonable inference that Allen had actual knowledge it was infringing AOB's Asserted Shooting Rest Patents or subjectively believed this to be the case and willfully chose to remain ignorant of the underlying facts behind AOB's patent rights and Allen's infringement of those rights.

173. Allen has also contributed to the infringement of the '561 Patent under 35 U.S.C. § 271(c) by importing, offering to sell, selling, and/or inducing the assembly of the Accused Shooting Rests within the United States knowing that the components of the Accused Shooting Rests were especially made or adapted for assembly in a manner that infringes at least claim 1 of the '561 Patent.

174. The components of the Accused Shooting Rests sold by Allen are material to practicing the claimed apparatus and are not staple articles or commodities of commerce suitable for substantial non-infringing use.

175. Allen has committed and continues to commit acts of infringement under 35 U.S.C. § 271 by making using, importing, offering to sell, and/or selling its Accused Shooting Rests and teaching, instructing, training, guiding, and directing its customers and end users on the assembly of the Accused Shooting Rests. In committing these acts of infringement, Allen acted despite having knowledge or willful blindness of the '561 Patent and knowledge or willful blindness that its actions constituted infringement of at least one valid and enforceable claim of the '561 Patent.

176. Allen acted with knowledge or willful blindness of the '561 Patent and despite an objectively and subjectively high likelihood that its actions constituted infringement of at least one valid and enforceable claim of the '561 Patent or willful blindness of same, and Allen knew or should have known or was willfully blind that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable claim of the '561 Patent.

177. As a direct and proximate result of Allen's acts of infringement, AOB has suffered and continues to suffer damages and irreparable harm.

178. AOB has no adequate remedy at law for Allen's acts of infringement and unless Allen's acts of infringement are enjoined, AOB will continue to be damaged and irreparably harmed.

COUNT 6
INFRINGEMENT OF U.S. PATENT NO. 9,702,653 B2

179. AOB realleges and incorporates by reference the foregoing paragraphs of this Complaint as though fully set forth herein.

180. Defendant, without license or authorization to do so, has directly infringed, induced infringement and contributorily infringed one or more claims of the '653 Patent, and continues to infringe, literally or under the doctrine of equivalents, one or more claims the '653 Patent by making, using, selling, offering for sale, and/or importing the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(a).

181. Allen by assembling the Accused Shooting Rests directly infringes the '653 Patent. For example, Allen's assembly of the Accused Shooting Rests infringes at least claims 1, 19, and 23 of the '653 Patent. Allen's website and other advertising and marketing materials show the Accused Shooting Rest Products fully assembled, and thus show direct infringement. On information and belief, it is reasonable to infer that Allen also fully assembles these products for use in its design processes, testing, quality assurance, sales training, trade show presentations, and other industry standard activities.

182. Allen, without license or authorization to do so, has also indirectly infringed the '653 Patent. Allen has actively induced infringement of one or more claims of the '653 Patent, and continues to actively induce infringement of one or more claims the '653 Patent, by inducing third parties (e.g., customers or end users) to assemble the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(b).

183. The third parties' assembly of the Accused Shooting Rests also directly infringes the '653 Patent. For example, the third parties' assembly of the Accused Shooting Rests infringes at least claims 1, 19, and 23 of the '653 Patent.

184. Allen has induced and is continuing to induce third parties to infringe the '653 Patent, including by selling components of the Accused Shooting Rests to third parties and facilitating, training, supporting, teaching, directing, or instructing the third parties to assemble the Accused Shooting Rests knowing that such assembly of the Accused Shooting Rests infringes at least claims 1, 19, and 23 of the '653 Patent. Allen sells components of the Accused Shooting Rests together with instruction materials specifically instructing third parties to assemble the Accused Shooting Rests in a way that directly infringes the '653 Patent.

185. Allen has induced and is inducing third parties to directly infringe the '653 Patent by assembling the Accused Shooting Rests with specific intent to cause the third parties to assemble the Accused Shooting Rests in a manner that infringes at least claims 1, 19, and 23 of the '653 Patent.

186. Upon information and belief, Allen possessed specific intent to induce direct infringement of at least claims 1, 19, and 23 of the '653 Patent by its customers and/or end users that assemble the Accused Shooting Rests.

187. Such steps by Allen include, among other things, advising, supporting, and directing customers and end users to assemble the Accused Shooting Rests in an infringing manner, and/or distributing and providing instructions, terms of use, training, or advertising, that guide others to assemble the Accused Shooting Rests in an infringing manner.

188. Allen was objectively aware of, and had knowledge of, the '653 Patent due to AOB's past warnings about patent infringement, the public nature of AOB's Asserted Shooting

Rest Patents, AOB's well known LEAD SLED products and market share, AOB's compliance with the marking statute identifying the Asserted Shooting Rest Patents, and Allen's demonstrated continuous monitoring of AOB's product line or was willfully blind to the fact the AOB owned the Asserted Shooting Rest Patents and that the Accused Shooting Rest Products infringed AOB's patent rights.

189. On information and belief, these facts create a reasonable inference that Allen had actual knowledge it was infringing AOB's Asserted Shooting Rest Patents or subjectively believed this to be the case and willfully chose to remain ignorant of the underlying facts behind AOB's patent rights and Allen's infringement of those rights.

190. Allen has also contributed to the infringement of the '653 Patent under 35 U.S.C. § 271(c) by importing, offering to sell, selling, and/or inducing the assembly of the Accused Shooting Rests within the United States knowing that the components of the Accused Shooting Rests were especially made or adapted for assembly in a manner that infringes at least claims 1, 19, and 23 of the '653 Patent.

191. The components of the Accused Shooting Rests sold by Allen are material to practicing the claimed apparatus and methods and are not staple articles or commodities of commerce suitable for substantial non-infringing use.

192. Allen has committed and continues to commit acts of infringement under 35 U.S.C. § 271 by making using, importing, offering to sell, and/or selling its Accused Shooting Rests and teaching, instructing, training, guiding, and directing its customers and end users on the assembly of the Accused Shooting Rests. In committing these acts of infringement, Allen acted despite having knowledge or willful blindness of the '653 Patent and knowledge or willful blindness that its actions constituted infringement of at least one valid and enforceable claim of the '653 Patent.

193. Allen acted with knowledge or willful blindness of the '653 Patent and despite an objectively and subjectively high likelihood that its actions constituted infringement of at least one valid and enforceable claim of the '653 Patent or willful blindness of same, and Allen knew or should have known or was willfully blind that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable claim of the '653 Patent.

194. As a direct and proximate result of Allen's acts of infringement, AOB has suffered and continues to suffer damages and irreparable harm.

195. AOB has no adequate remedy at law for Allen's acts of infringement and unless Allen's acts of infringement are enjoined, AOB will continue to be damaged and irreparably harmed.

COUNT 7
INFRINGEMENT OF U.S. PATENT NO. 10,859,336 B2

196. AOB realleges and incorporates by reference the foregoing paragraphs of this Complaint as though fully set forth herein.

197. Defendant, without license or authorization to do so, has directly infringed, induced infringement of and contributorily infringed one or more claims of the '336 Patent, and continues to infringe, literally or under the doctrine of equivalents, one or more claims the '336 Patent by making, using, selling, offering for sale, and/or importing the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(a).

198. Allen by assembling the Accused Shooting Rests directly infringes the '336 Patent. For example, Allen's assembly of the Accused Shooting Rests infringes at least claim 1 of the '336 Patent.

199. Allen's website and other advertising and marketing materials show the Accused Shooting Rest Products fully assembled, and thus show direct infringement. On information and

belief, it is reasonable to infer that Allen also fully assembles these products for use in its design processes, testing, quality assurance, sales training, trade show presentations, and other industry standard activities.

200. Allen, without license or authorization to do so, has also indirectly infringed the '336 Patent. Allen has actively induced infringement of one or more claims of the '336 Patent, and continues to actively induce infringement of one or more claims the '336 Patent, by inducing third parties (e.g., customers or end users) to assemble the Accused Shooting Rests within the United States, in violation of 35 U.S.C. § 271(b).

201. The third parties' assembly of the Accused Shooting Rests also directly infringes the '336 Patent. For example, the third parties' assembly of the Accused Shooting Rests infringes at least claim 1 of the '336 Patent.

202. Allen has induced and is continuing to induce third parties to infringe the '336 Patent, including by selling components of the Accused Shooting Rests to third parties and facilitating, training, supporting, teaching, directing, or instructing the third parties to assemble the Accused Shooting Rests knowing that such assembly of the Accused Shooting Rests infringes at least claim 1 of the '336 Patent. Allen sells components of the Accused Shooting Rests together with instruction materials specifically instructing third parties to assemble the Accused Shooting Rests in a way that directly infringes the '336 Patent.

203. Allen has induced and is inducing third parties to directly infringe the '336 Patent by assembling the Accused Shooting Rests with specific intent to cause the third parties to assemble the Accused Shooting Rests in a manner that infringes at least claim 1 of the '336 Patent.

204. Upon information and belief, Allen possessed specific intent to induce direct infringement of at least claim 1 of the '336 Patent by its customers and/or end users that assemble the Accused Shooting Rests.

205. Such steps by Allen include, among other things, advising, supporting, and directing customers and end users to assemble the Accused Shooting Rests in an infringing manner, and/or distributing and providing instructions, terms of use, training, or advertising, that guide others to assemble the Accused Shooting Rests in an infringing manner.

206. Allen was objectively aware of, and had knowledge of, the '336 Patent due to AOB's past warnings about patent infringement, the public nature of AOB's Asserted Shooting Rest Patents, AOB's well known LEAD SLED products and market share, AOB's compliance with the marking statute identifying the Asserted Shooting Rest Patents, and Allen's demonstrated continuous monitoring of AOB's product line or was willfully blind to the fact the AOB owned the Asserted Shooting Rest Patents and that the Accused Shooting Rest Products infringed AOB's patent rights.

207. On information and belief, these facts create a reasonable inference that Allen had actual knowledge it was infringing AOB's Asserted Shooting Rest Patents or subjectively believed this to be the case and willfully chose to remain ignorant of the underlying facts behind AOB's patent rights and Allen's infringement of those rights.

208. Allen has also contributed to the infringement of the '336 Patent under 35 U.S.C. § 271(c) by importing, offering to sell, selling, and/or inducing the assembly of the Accused Shooting Rests within the United States knowing that the components of the Accused Shooting Rests were especially made or adapted for assembly in a manner that infringes at least claim 1 of the '336 Patent.

209. The components of the Accused Shooting Rests sold by Allen are material to practicing the claimed apparatus and are not staple articles or commodities of commerce suitable for substantial non-infringing use.

210. Allen has committed and continues to commit acts of infringement under 35 U.S.C. § 271 by making using, importing, offering to sell, and/or selling its Accused Shooting Rests and teaching, instructing, training, guiding, and directing its customers and end users on the assembly of the Accused Shooting Rests. In committing these acts of infringement, Allen acted despite having knowledge or willful blindness of the '336 Patent and knowledge or willful blindness that its actions constituted infringement of at least one valid and enforceable claim of the '336 Patent.

211. Allen acted with knowledge or willful blindness of the '336 Patent and despite an objectively and subjectively high likelihood that its actions constituted infringement of at least one valid and enforceable claim of the '336 Patent or willful blindness of same, and Allen knew or should have known or was willfully blind that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable claim of the '336 Patent.

212. As a direct and proximate result of Allen's acts of infringement, AOB has suffered and continues to suffer damages and irreparable harm.

213. AOB has no adequate remedy at law for Allen's acts of infringement and unless Allen's acts of infringement are enjoined, AOB will continue to be damaged and irreparably harmed.

JURY DEMAND

214. AOB hereby requests a trial by jury on all issues properly heard by a jury pursuant to the Seventh Amendment of the United States Constitution.

PRAYER FOR RELIEF

WHEREFORE, AOB respectfully requests that the Court enter judgement against Defendant Allen and that the Court enter an order:

- A. Finding that Defendant infringed and is infringing one or more claims of each of the Asserted Patents;
- B. Finding that Defendant's infringement has been willful;
- C. Enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringing, inducing the infringement of, or contributing to the infringement of each of the Asserted Patents pursuant to 35 U.S.C. § 283;
- D. Awarding damages to AOB adequate to compensate AOB for the Defendant's acts of infringement together with pre-judgment and post-judgment interest pursuant to 35 U.S.C. § 284;
- E. Trebling the damage award under 35 U.S.C. § 284;
- F. Finding this to be an exceptional case under 35 U.S.C. § 285 and awarding Plaintiff its reasonable attorneys' fees and expenses in this action;
- G. Awarding Plaintiff its costs in this action; and
- H. Any further relief that the Court deems just and proper.

Date: January 26, 2023

Respectfully submitted,

STINSON LLP

By: /s/ Judith Araujo

David R. Barnard, #47127MO
1201 Walnut Street, Suite 2900
Kansas City, MO 64106-2150
Tel.: (816) 691-2608
Email: david.barnard@stinson.com

Judith Araujo, #54102CO
1144 Fifteenth Street, Suite 2400
Denver, CO 80202
Tel.: (303) 376-8400
Email: Judith.araujo@stinson.com

Adrianna M. Chavez, #035011AZ
1850 N. Central Ave., Suite 2200
Phoenix, AZ 85004
Tel.: (602) 212-8589
Email: adrianna.chavez@stinson.com

**ATTORNEYS FOR PLAINTIFF AOB
PRODUCTS COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on January 26th, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

By: /s/ Judith Araujo
Attorney for Plaintiff