

1 DICKINSON WRIGHT PLLC  
JOHN L. KRIEGER, ESQ.  
2 Nevada Bar No. 6023  
Email: JKrieger@dickinsonwright.com  
3 3883 Howard Hughes Parkway, Suite 800  
Las Vegas, Nevada 89169-0965  
4 Tel: 702-550-4400  
Fax: 844-670-6009

5 RYDER, MAZZEO & KONIECZNY LLC  
6 JOSEPH M. KONIECZNY, SR.  
(Pro Hac Vice to be submitted)  
7 Email: jkonieczny@ryderlu.com  
P.O. Box 670  
8 Plymouth Meeting, PA 19462  
Tel: 610-940-1962  
9 Fax: 610-940-1963

10 *Attorneys for Plaintiff*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 CAA INDUSTRIES, LTD.,

15 Plaintiff,

16 v.

17 RECOVER INNOVATIONS, INC.  
d/b/a RECOVER TACTICAL,

18 Defendant.  
19

Case No.: \_\_\_\_\_

**JURY TRIAL DEMANDED**

20  
21 **VERIFIED COMPLAINT**

22 CAA Industries Ltd., a corporation organized under the laws of Israel, by way of  
23 Complaint against Recover Innovations, Inc. d/b/a Recover Tactical, alleges as follows:

24 **NATURE OF THE ACTION**

25 1. This is a civil action for patent infringement under 35 U.S.C. § 271 and 281.

26 **JURISDICTION**

27 2. Subject matter jurisdiction over this action is proper in this Court under 28 U.S.C.

28 §§ 1331, 1332, and 1338 for the reasons set forth below.



1 3. Upon information and belief, this Court may exercise personal jurisdiction over  
2 Defendant Recover Innovations, Inc. d/b/a Recover Tactical because it is incorporated in the  
3 state of Nevada and has a regular and established place of business in the state of Nevada.

4 **VENUE**

5 4. Venue is proper in this district under 28 U.S.C. section 1391 and 1400 for the  
6 reasons set forth below.

7 **PARTIES**

8 5. Plaintiff CAA Industries Ltd., (“CAA Industries”) is a corporation organized  
9 under the laws of Israel in 2004, having a place of business at 1 Ha-Bonim St., P.O. Box 861,  
10 Qiryat-Gat, Israel 8258201.

11 6. Defendant Recover Innovations, Inc. is a Nevada corporation doing business as  
12 Recover Tactical (“Recover Tactical”). Recover Tactical’s registered place of business is at  
13 2620 Regatta Dr., Suite 102, Las Vegas, NV 89128. Recover Tactical’s registered agent for  
14 service of process is Sherman Law PLLC at 2620 Regatta Drive, Suite 102, Las Vegas, NV  
15 89128.

16 **STATEMENT OF FACTS COMMON TO ALL COUNTS**

17 7. Since its founding in 2004, Plaintiff CAA Industries has designed, developed, and  
18 manufactured firearms accessories.

19 8. CAA Industries has pushed innovation in the firearms industry, has invented a  
20 number of firearm tactical accessories that have become widely used and popular, and has  
21 defined industry standards. All of CAA Industries products were designed by, and some  
22 patented by, Moshe Oz.

23 9. CAA Industries ensures that its products meet the highest possible quality and  
24 safety requirements and standards.

25 10. CAA Industries markets and sells its products to law enforcement, armed  
26 services, and firearm hobbyists and enthusiasts around the world.  
27  
28



1 11. CAA Industries’ most popular and well-known products are pistol carbine  
2 conversion kits or stabilizers, such as sold under the marks RONI and MICRO RONI, and their  
3 accessory and related products.

4 12. A pistol carbine conversion kit (also known as a “stabilizer kit” or simply  
5 “stabilizer”) is a firearms accessory/stabilizer that enables a user to convert a pistol into a mini  
6 carbine (longer firearm) to offer better grip, stability, range, and accuracy. Several pistol carbine  
7 conversion kits are shown in exhibits 4 and 5. All exhibits identified herein refer to the exhibits  
8 filed in support of CAA Industries’ motion for preliminary injunction, filed contemporaneously  
9 herewith, which are incorporated herein by reference.

10 13. The original RONI conversion kit was invented by Moshe Oz prior to 2010 and is  
11 protected by two U.S. patents: U.S. Patent No. 8,887,432 and U.S. Patent No. 8,312,803 (“the  
12 ‘803 Patent”) entitled Semi-Automatic Pistol Slide Pull. Ex. 7.

13 14. CAA Industries spent thousands of hours and hundreds of thousands of dollars  
14 designing, developing and perfecting the RONI conversion kit.

15 15. The MICRO RONI Conversion Kit was also invented by Moshe Oz prior to 2016  
16 and is also protected by the ‘803 Patent. CAA Industries spent thousands of hours and hundreds  
17 of thousands of dollars designing, developing and perfecting the MICRO RONI conversion kit.

18 16. CAA Industries is the owner by assignment of the inventor, Moshe Oz, of the  
19 ‘803 Patent. The ‘803 Patent relates to a “charging handle” or “slide pull” for aiding in pulling a  
20 slide on a semi-automatic pistol, especially when installed in a pistol carbine conversion kit. A  
21 charging handle is an important and often necessary component of many conversion kits such as  
22 the RONI and MICRO RONI conversion kits.

23 17. The ‘803 Patent was duly and legally issued by the United States Patent and  
24 Trademark Office.

25 18. The ‘803 Patent is in force.

26 19. The ‘803 Patent is valid and enforceable.

27 **DEFENDANT’S INFRINGING ACTIVITIES**

28 20. Recover Tactical is a manufacturer and distributor of firearms accessories.



1 21. Recover Tactical directly competes with CAA Industries in the firearms  
2 accessories industry.

3 22. Among other products, Recover Tactical manufactures and sells charging handles  
4 for pistols that directly infringe the '803 Patent, including model numbers GCH, GCH42,  
5 GCH43, GCH43 Upgrade Pack, MCH, PCH17, SCH9/40, UCH17, UCH21, and UCH44.  
6 (Defendant's "Infringing Charging Handles").

7 23. Recover Tactical manufactures and distributes pistol carbine conversion kits that  
8 include one or more of Defendant's Infringing Charging Handles, including model nos.: P-IX-B;  
9 P-IX-MG; 20/20NB; 20/20NS; 20/20NH; 20/20NMG; 20/21B; 20/21S; 20/21H; 20/21MG;;  
10 20/22B; 20/22S; 20/22H; and 20/22UR (Defendant's "Infringing Conversion Kits").

11 24. Defendant's Infringing Charging Handles and Infringing Conversion Kits are  
12 collectively referred to as the "Infringing Products".

13 25. The Infringing Products directly infringe one or more claims of the '803 Patent.

14 26. On information and belief, Recover Tactical was aware of the '803 Patent when it  
15 designed the Infringing Products.

16 27. On information and belief, Recover Tactical was aware of the '803 Patent when it  
17 sold the Infringing Products.

18 28. On information and belief, Recover Tactical is knowingly and intentionally  
19 infringing the '803 Patent.

20 29. On information and belief, Defendant had actual knowledge of the '803 Patent  
21 prior to committing the unlawful acts alleged herein.

22 30. Plaintiff has suffered lost profits and other economic damages in excess of  
23 \$75,000 as a result of Defendant's unlawful acts.

24 **COUNT I - PATENT INFRINGEMENT**

25 31. Plaintiff incorporates and re-alleges all preceding paragraphs as if set forth fully  
26 hereinafter.

27 32. Defendant's acts constitute patent infringement under 35 U.S.C. section 271.  
28



1 33. Defendant has directly infringed and continues to directly infringe, literally or  
2 under the doctrine of equivalents, the '803 Patent in violation of 35 U.S.C. § 271 by making,  
3 using, selling, and/or offering to sell in the U.S., and/or importing into the U.S., the Infringing  
4 Products directly and through intermediaries.

5 34. Defendant will continue to directly and/or indirectly infringe the '803 Patent  
6 unless and until it is enjoined by this Court.

7 35. Defendant has profited by infringing the '803 Patent.

8 36. Defendant has no license from Plaintiff to engage in the promotion or sale of the  
9 Infringing Products.

10 37. Defendant's infringement has been deliberate and willful, or at least amounts to  
11 willful blindness of the existence of the '803 Patent.

12 38. Plaintiff has suffered and continues to suffer damages and irreparable harm due to  
13 Defendant's direct and/or indirect infringement of the '803 Patent.

14 39. Plaintiff will suffer further irreparable injury, for which there is no adequate  
15 remedy at law, unless and until Defendant is enjoined from infringing the '803 Patent.

16 40. Plaintiff is entitled to an injunction to stop the irreparable injuries caused by the  
17 infringement complained of herein.

18 41. Plaintiff is entitled to an award of compensatory damages, lost profits, and such  
19 other relief as is available under the patent laws, and in no event less than an amount equivalent  
20 to a reasonable royalty.

21 42. Plaintiff is also entitled to enhanced damages and attorneys' fees.

22 **COUNT II - UNJUST ENRICHMENT**

23 43. Plaintiff incorporates and re-alleges all preceding paragraphs as if set forth fully  
24 hereinafter.

25 44. Defendant's acts constitute unjust enrichment.

26 45. Plaintiff has conferred a benefit on Defendant.

27 46. Defendant has appreciated and continues to appreciate such benefit.  
28



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

47. Defendant has knowledge of the benefit and has voluntarily accepted and retained the benefit without providing any compensation to Plaintiff for the same.

48. Under the circumstances alleged above, it would be inequitable for the Defendant to retain the benefit without compensating Plaintiff.

49. Plaintiff has no remedy at law.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs prays for and Order:

- a) Finding Defendant liable for infringing Plaintiff’s patent rights;
- b) Finding Defendant’s foregoing misconduct was willful;
- c) Issuing a preliminary and permanent injunction enjoining Defendant from making, using, selling, or offering for sale in the United States, or importing into the United States, the Infringing Products;
- d) Issuing a preliminary and permanent injunction ordering the transfer of any existing Infringing Products, and the molds associated with the Infringing Products, to Plaintiff;
- e) Awarding damages adequate to compensate Plaintiff for the patent infringements that have occurred pursuant to 35 U.S.C. § 284, which shall be trebled as a result of Defendant’s willful patent infringement, or an award of Defendant’s profits from its infringements pursuant to 35 U.S.C. § 289, whichever is greater, together with prejudgment interest and costs;
- f) Awarding costs and disbursements;
- g) Declaring this an exceptional case and awarding Plaintiff its reasonable attorneys’ fees;
- h) Awarding punitive damages due to Defendant’s willful, wanton, and malicious conduct; and
- i) Granting Plaintiff such other and further relief as the Court may deem just and proper.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**JURY TRIAL**

Plaintiff requests a trial by jury pursuant to Fed. R. Civ. P. 38(b) on all issues triable of right by a jury.

DATED: April 6, 2022

DICKINSON WRIGHT PLLC

*/s/ John L. Krieger*

---

John L. Krieger  
Email: JKrieger@dickinsonwright.com  
3883 Howard Hughes Parkway, Suite 800  
Las Vegas, Nevada 89169-0965  
Tel: 702-550-4400

Joseph M. Konieczny, Sr.  
*(Pro Hoc Vice to be submitted)*  
Email: jkonieczny@ryderlu.com  
P.O. Box 670  
Plymouth Meeting, PA 19462  
Tel: 610-940-1962

*Attorneys for Plaintiff*

-

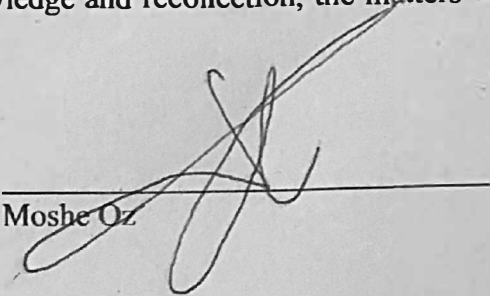


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**VERIFICATION**

I, Moshe Oz, am the President and part owner of CAA Industries, Ltd. I verify under penalty of perjury under the laws of the United States that I have read the above complaint and its contents and verify that, to the best of my knowledge and recollection, the matters stated in the complaint are true and correct.

Dated: April 5, 2022

  
\_\_\_\_\_  
Moshe Oz

D  
W