

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

COLT'S MANUFACTURING IP  
HOLDING COMPANY, LLC AND  
COLT'S MANUFACTURING  
COMPANY LLC,

Plaintiffs,

v.

AJAX GRIPS LLC,

Defendant.

Civil Action No.

**JURY TRIAL DEMANDED**

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**COMPLAINT**

Plaintiffs, Colt's Manufacturing IP Holding Company, LLC and Colt's Manufacturing Company LLC, do hereby, through their attorneys, allege as follows:

**THE PARTIES**

1. Plaintiff Colt's Manufacturing IP Holding Company, LLC (hereinafter "CMIP"), is a limited liability company organized and existing under the laws of Delaware, having a principal place of business at 545 New Park Ave., West Hartford, CT 06110.

2. Plaintiff Colt's Manufacturing Company LLC (hereinafter "CMC") is a limited liability company organized and existing under the laws of Delaware with a principal place of business at 545 New Park Ave., West Hartford, CT 06110 (CMC and CMIP hereafter collectively referred to as "Colt" or "Plaintiffs.")

3. Upon information and belief, Defendant Ajax Grips LLC, (hereinafter "Ajax"), is a limited liability company organized and existing under the laws of Texas, having a principal place of business at 1325 Whitlock Lane, Suite 314, Carrollton, Texas 75006-3177.

**JURISDICTION AND VENUE**

4. This is a civil action for trademark infringement and unfair competition under Sections 32 and 43 of the Lanham Act, 15 U.S.C. §§ 1114 and 1125, trademark infringement under Connecticut common law, and for unfair and deceptive trade practices in violation of the Connecticut Unfair Trade Practices Act (Conn. Gen. Stat. §§ 42-110(a) *et seq.*). Jurisdiction is conferred upon this Court pursuant to 15 U.S.C. §§ 1121 and 28 U.S.C. §§ 1331, 1332, and 1338.

5. This Court has personal jurisdiction over Ajax in that it transacts business in this judicial district and/or has committed acts within this judicial district giving rise to this action.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c).

**BACKGROUND FACTS**

7. Colt has been manufacturing firearms for over 170 years and is one of the world's leading gun manufacturers, producing firearms for the United States military, law enforcement, commercial, and international markets.

8. Colt is dedicated to delivering the world's finest, innovative firearms to the military, law enforcement, and civilian customers, through a deep commitment to quality and safety.

9. CMIP is the owner by assignment of numerous famous trademarks including, but not limited to the following (collectively, the "COLT Marks"):

- a. U.S. Trademark Registration No. 0052904 for the mark,



filed on August 1, 1905 and registered on May 22, 1906

covering "Pistols" in Class 13;

b. U.S. Trademark Registration No. 0736237 for COLT, filed on October 27, 1961 and registered on August 21, 1962, covering “Revolvers, Pistols, Shotguns, and Rifles” in Class 13;

c. U.S. Trademark Registration No. 1599500 for the mark,



filed on July 26, 1989 and registered on June 5, 1990,

covering “Pistols, Revolvers, and Rifles” in class 13;

d. U.S. Trademark Registration No. 3380438 for the mark,



filed on February 19, 2007 and registered on February 12, 2008,

covering “Firearms; Pistols; Pistols and parts thereof; Revolvers and parts thereof” in Class 13; and

e. U.S. Trademark Registration No. 3377544 for the mark



filed on April 27, 2007 and registered on February 5, 2008

covering “Pistols” in Class 13.

10. CMIP owns both common law and federally registered rights to its well-known COLT Marks used on and in connection with firearms. True and correct copies of the COLT registrations are attached hereto as Exhibit A.

11. CMC is a licensee of the COLT Marks with the right, amongst other things, to manufacture and sell goods bearing the COLT Marks.

12. Colt began using one or more of the COLT Marks in commerce at least as early as 1865.

13. Colt has made a substantial investment in creating, promoting, and protecting the COLT Marks, and, as a result, the COLT Marks have developed a high degree of recognition and substantial goodwill among the industry, the trade, the media, and consumers.

14. Upon information and belief, Ajax markets and sells, among other things, handgun grips.

15. Upon information and belief and without authorization or permission from Colt, Ajax makes, uses, sells, and/or offers for sale imitation pearl grips inlaid with steel Colt medallions bearing the COLT Marks, in commerce throughout the United States, including in this judicial district, at least through its online store <http://www.ajaxgripsllc.com/index.html>, examples of which are below. See also Exhibit B, attached hereto.



16. Upon information and belief, Ajax is also advertising that the imitation medallions are installed on all Colt grip models, which include Colt's 1911 and single actions

army models.

17. Ajax is also advertising these products on its Facebook page at <https://www.facebook.com/AjaxGrips/>. See Exhibit C, attached hereto.

18. On April 24, 2017, Colt sent Ajax a letter demanding that it immediately stop using the COLT Marks. A true and accurate copy of the April 24, 2017 letter is attached hereto as Exhibit D.

19. Ajax has not complied with Colt's demands.

20. Ajax's actions as alleged herein have been undertaken willfully and in bad faith.

21. Ajax has infringed and continues to infringe Colt's COLT Marks by various acts as alleged herein including, but not limited to, advertising, marketing, offering for sale, and selling imitation pearl grips inlaid with steel Colt medallions bearing the COLT Marks throughout the United States, targeting similar consumers as Colt, and in the same channels of trade as Colt's goods, and will continue to do so unless enjoined therefrom by this Court.

22. Ajax's conduct as alleged herein has confused and/or is likely to confuse consumers as to the source, sponsorship, endorsement, and or origination of Ajax's products.

23. Colt has been irreparably harmed by Ajax's infringement to an extent not yet determined, and will continue to be irreparably harmed in the future unless Ajax is enjoined from its activities by this Court.

**COUNT I**  
**(Federal Trademark Infringement)**

24. Colt repeats and realleges paragraphs 1 - 23, above, as though fully set forth herein.

25. This is a claim for federal trademark infringement under the Lanham Act, 15 U.S.C. § 1114.

26. Ajax has infringed each of Colt's federally-registered COLT Marks by using the confusingly similar steel Colt medallions bearing the COLT Marks on its handgun grips, in commerce in association with products and services that are the same as and/or substantially similar to Colt's goods offered under the COLT Marks, by creating a likelihood of confusion and mistake among customers and the public, and by deceiving them.

27. Ajax's unauthorized use of the COLT Marks in connection with the sale, offering for sale, distribution, and advertising of Ajax's handgun grips are intended to trade upon the goodwill and substantial recognition associated with Colt's COLT Marks used on or in connection with firearms.

28. Ajax's unauthorized use of CMC's COLT Marks in association with Ajax's products and services is intended to cause confusion, mistake or deception.

29. Upon information and belief, at the time of committing certain acts alleged herein, Ajax had actual knowledge of Colt's ownership and prior use of its COLT Marks in connection with firearms manufactured and sold by Colt.

30. By virtue of these acts, Ajax has further created a likelihood of injury to Colt's business, caused a strong likelihood of customer confusion as to the source of Ajax's products and services, and has otherwise competed unfairly with Colt.

31. By these acts, Ajax has willfully infringed Colt's federally-registered COLT Marks in violation of 15 U.S.C. § 1114.

32. Ajax's aforesaid acts of infringement have injured and violated the rights of Colt in an amount to be determined at trial. Ajax's acts complained of herein have caused damage to Colt and have irreparably injured the public recognition and goodwill associated with Colt's COLT Marks.

33. Further, by these acts, Ajax has irreparably injured Colt and such injury will continue unless enjoined by this Court.

**COUNT II**  
**(Federal Unfair Competition and False Designation of Origin)**

34. Colt repeats and realleges paragraphs 1 - 33, above, as though fully set forth herein.

35. This is a claim for unfair competition and false designation of origin under the Lanham Act, 15 U.S.C. § 1125(a).

36. In violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), Ajax has created and will continue to create a false designation of origin by selling and using in commerce, without permission of, or license from Colt, the imitation pearl grips inlaid with steel Colt medallions bearing the COLT Marks, which will confuse and/or likely confuse potential customers into believing that Ajax's products and services are associated with, sponsored by, or approved by Colt.

37. Upon information and belief, at the time of committing certain acts alleged herein, Ajax had actual knowledge of Colt's ownership and prior use of its COLT Marks for use in connection with Colt firearms.

38. Ajax's aforesaid unauthorized acts have been willful and have injured and violated the rights of Colt in an amount to be determined at trial.

39. Further, by its actions, Ajax has irreparably injured Colt, and such irreparable injury will continue unless this Court enjoins Ajax.

**COUNT III**  
**(Connecticut Common Law Trademark Infringement)**

40. Colt repeats and realleges paragraphs 1 - 39, above, as though fully set forth herein.

41. This is an action for common law trademark infringement arising under common law of the state of Connecticut.

42. By virtue of the aforesaid acts, Ajax has attempted to and has created confusion as to the source of its products and services.

43. Such acts have the natural and probable tendency to deceive the public so as to essentially pass off Ajax's products as those of Colt's products.

44. As a result of Ajax's aforesaid acts, ordinary buyers making purchases under ordinary conditions have and will be confused and deceived.

45. As a result of Ajax's aforesaid acts, Colt has suffered and will continue to suffer damages in an amount to determined at trial.

46. Further, by its actions, Ajax has irreparably injured Colt, and such irreparable injury will continue unless this Court enjoins Ajax.

**COUNT IV**

**(Unfair Competition – Connecticut Unfair Trade Practices Act)**

47. Colt repeats and realleges paragraphs 1 - 46, above, as though fully set forth herein.

48. This is a claim for unfair and deceptive trade practices under the Connecticut Unfair and Deceptive Trade Practices Act ("CUTPA"), Conn. Gen. Stat. § 42-110(a), *et seq.*

49. The actions of Ajax described herein constitute unfair and deceptive acts or practices, which have deceived and will continue to deceive Colt's customers and potential customers and which have injured and will continue to injure the goodwill, reputation, and business of Colt.

50. The actions of Ajax described herein are in and affecting commerce and are unfair and/or deceptive acts or practices in violation of CUTPA.



51. As a direct and proximate result of Ajax's unfair and deceptive conduct, Colt has suffered and will continue to suffer damages in an amount to be determined at trial.

52. Further, by its actions, Ajax has irreparably injured Samkwang, and such irreparable injury will continue unless this Court enjoins Ajax.

**PRAYER FOR RELIEF**

WHEREFORE, Colt respectfully asks this Court to enter judgment against Ajax, and against respective subsidiaries, successors, parents, affiliates, officers, directors, agents, servants and employees, and all persons in active concert or participation with Ajax, as follows:

- A. Declare that Ajax has infringed Colt's federally registered trademarks in violation of the Lanham Act, 15 U.S.C. § 1114 and/or Connecticut common law;
- B. Declare that Ajax's unauthorized sale and use in commerce of the imitation pearl grips inlaid with steel Colt medallions bearing the COLT Marks is confusingly similar to Colt's COLT Marks in violation of the Lanham Act, 15 U.S.C. § 1125(a), as a false designation of origin, false description or representation;
- C. Declare that Ajax's acts and practices as set forth herein constitute unfair competition in violation of the Connecticut Unfair Trade Practices Act, and award Colt damages resulting therefrom, including but not necessarily limited to compensatory damages, lost profits, and/or a disgorgement of Ajax's profits as permitted by law;
- D. Preliminarily and permanently enjoin Ajax from further infringement of Colt's COLT Marks;
- E. Declare that Ajax's acts as complained of herein shall be deemed willful, and/or that this be deemed an exceptional case pursuant to 15 U.S.C. § 1117(a) and/or

CUTPA and further declaring that Colt is entitled to treble damages;

- F. Award Colt statutory damages in connection with Count I for Ajax's intentional and willful violation of 15 U.S.C. § 1114(1)(a) pursuant to 15 U.S.C. § 1117;
- G. Award Colt statutory damages in connection with Count II for Ajax's intentional and willful violation of 15 U.S.C. § 1125(a) pursuant to 15 U.S.C. § 1117;
- H. Award Colt statutory damages in connection with Count IV pursuant to CUTPA;
- I. Award Colt its costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1117;
- J. Award any such other relief to which Colt is entitled under law, and any other and further relief that this Court or a jury may deem just and proper.

**DEMAND FOR JURY TRIAL**

Colt demands a trial by jury on all issues so triable.

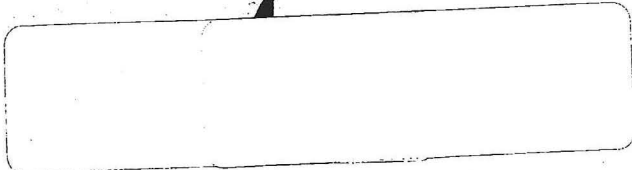
Date: June 30, 2017

Respectfully submitted,

/s/ Steven M. Coyle  
Steven M. Coyle, Esq. (ct21039)  
[scoyle@cantorcolburn.com](mailto:scoyle@cantorcolburn.com)  
Tasia E. Hansen, Esq. (ct29498)  
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CANTOR COLBURN LLP  
20 Church Street, 22<sup>nd</sup> Floor  
Hartford, CT 06103  
Tel. (860) 286-2929  
Fax. (860) 286-0115

*Attorneys for Plaintiffs*

# **EXHIBIT A**



## UNITED STATES PATENT OFFICE.

COLT'S PATENT FIRE ARMS MANUFACTURING COMPANY, OF HARTFORD,  
CONNECTICUT.

### TRADE-MARK FOR PISTOLS.

No. 52,904.

Statement and Declaration.

Registered May 22, 1906.

Application filed August 1, 1905. Serial No. 11,092.

#### STATEMENT.

*To all whom it may concern:*

Be it known that the COLT'S PATENT FIRE ARMS MANUFACTURING COMPANY, a corporation duly organized under special act of the legislature of the State of Connecticut, and located in the city of Hartford, county of Hartford, in said State, and doing business at No. 17 Van Dyke street, in said city of Hartford, has adopted for its use a trade-mark, of which the following is a description.

The trade-mark consists in the word "COLT" above the representation of a colt rampant carrying parts of a spear in its mouth and parts of a spear between its fore legs, the whole inclosed in a circular panel.

This trade-mark has been continuously used by the said company since about May, 1893.

The class of merchandise to which this trade-mark is appropriated is firearms, and the particular description of goods comprised in said class upon which said trade-mark is used by said company is pistols.

The trade-mark is usually affixed to the firearms by stamping or pressing the same thereon at some exposed point. It is also used by printing, stenciling, or otherwise displayed upon the packages containing one or more of the articles mentioned.

COLT'S PATENT FIRE ARMS  
MANUFACTURING COMPANY,  
By LEWIS C. GROVER,  
*President.*

#### DECLARATION.

State of Connecticut, county of Hartford, ss:

LEWIS C. GROVER, being duly sworn, deposes and says that he is the president of the corporation, the applicant named in the foregoing statement; that he believes the foregoing statement is true; that he believes said corporation is the owner of the trade-mark sought to be registered and that no other person, firm, corporation, or association, to the best of his knowledge and belief, has the right to use said trade-mark, either in the identical form or in any such near resemblance thereto as might be calculated to deceive; that said trade-mark is used by said corporation in commerce among the several

States of the United States, and particularly between Connecticut, New York and Missouri; and between the United States and foreign nations or Indian tribes, and particularly with Great Britain; and that the description, drawing and specimens presented truly represent the trade-mark sought to be registered.

LEWIS C. GLOVER.

Subscribed and sworn to before me, a notary public, this twentieth day of October, 1905.

[L. s.]

CARL J. EHBETS,  
*Notary Public.*

3 - S - 17

**TRADE-MARK.**

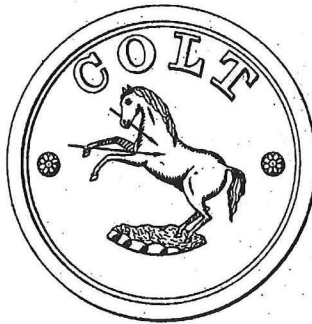
No. 52,904.

REGISTERED MAY 22, 1906.

COLT'S PATENT FIRE ARMS MANUFACTURING COMPANY.

PISTOLS.

APPLICATION FILED AUG. 1, 1906.



**PROPRIETOR.**

*Colt's Patent Firearms Manufacturing Company,*

*by C. J. Ebbets.*

**ATTORNEY.**

# United States Patent Office

736,237  
Registered Aug. 21, 1962

## PRINCIPAL REGISTER Trademark

Ser. No. 130,762, filed Oct. 27, 1961

### COLT

Colt's Patent Fire Arms Manufacturing Company, Inc.  
(Arizona corporation)  
150 Huyshope Ave.  
Hartford 15, Conn.

For: REVOLVERS, PISTOLS, SHOTGUNS, AND  
RIFLES, in CLASS 9.  
First use 1889 on pistols; in commerce 1889.  
Owner of Reg. No. 49,430.

**Int. Cl.: 13**

**Prior U.S. Cl.: 9**

**United States Patent and Trademark Office** **Reg. No. 1,599,500**  
**Registered June 5, 1990**

**TRADEMARK  
PRINCIPAL REGISTER**



**COLT INDUSTRIES INC (PENNSYLVANIA  
CORPORATION)  
430 PARK AVENUE  
NEW YORK, NY 10022**

**FIRST USE 0-0-1930; IN COMMERCE  
0-0-1930.  
OWNER OF U.S. REG. NOS. 49,430, 58,249,  
AND 736,237.**

**FOR: PISTOLS, REVOLVERS, AND RIFLES,  
IN CLASS 13 (U.S. CL. 9).**

**SER. NO. 73-814,946, FILED 7-26-1989.  
DAVID A. JONES, EXAMINING ATTORNEY**



Int. Cl.: 13

Prior U.S. Cls.: 2 and 9

**United States Patent and Trademark Office**

**Reg. No. 3,380,438**

Registered Feb. 12, 2008

**TRADEMARK  
PRINCIPAL REGISTER**



NEW COLT HOLDING CORPORATION (DELA-  
WARE CORPORATION)  
545 NEW PARK AVENUE  
WEST HARTFORD, CT 061101332

OWNER OF U.S. REG. NOS. 1,599,500, 2,128,213  
AND OTHERS.

FOR: FIREARMS; PISTOLS; PISTOLS AND PARTS  
THEREOF; REVOLVERS AND PARTS THEREOF,  
IN CLASS 13 (U.S. CLS. 2 AND 9).

SER. NO. 77-110,476, FILED 2-19-2007.

FIRST USE 1-10-1987; IN COMMERCE 1-10-1987.

JENNIFER HETU, EXAMINING ATTORNEY



Int. Cl.: 13

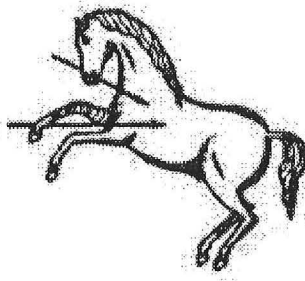
Prior U.S. Cls.: 2 and 9

Reg. No. 3,377,544

United States Patent and Trademark Office

Registered Feb. 5, 2008

TRADEMARK  
PRINCIPAL REGISTER



NEW COLT HOLDING CORPORATION (DELA-  
WARE CORPORATION)  
545 NEW PARK AVENUE  
WEST HARTFORD, CT 061101332

FOR: PISTOLS, IN CLASS 13 (U.S. CLS. 2 AND 9).

FIRST USE 1-1-1865; IN COMMERCE 1-1-1865.

OWNER OF U.S. REG. NO. 52,903.

THE MARK CONSISTS OF THE REPRESENTA-  
TION OF A COLT RAMPANT CARRYING PARTS  
OF A SPEAR IN ITS MOUTH AND PARTS OF A  
SPEAR BETWEEN ITS FORELEGS.

SER. NO. 77-167,777, FILED 4-27-2007.

JENNIFER HETU, EXAMINING ATTORNEY

# **EXHIBIT B**



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Smith & Wesson J Round Grip White Pearlite   Sig Sauer P238 White Pearlite   Smith & Wesson Full Size White Pearlite

\$40.00

\$40.00

\$40.00

White Pearlite



1911 Full Size Colt Pearlite Gold Coin \$60.00  
 1911 Full Size White Pearlite Gold Coin \$60.00  
 1911 Compact White Pearlite USMC Coin \$60.00



1911 Compact White Pearlite Gold Coin \$60.00  
 Smith & Wesson Frame BB White Pearlite Medallion \$55.00  
 Smith & Wesson 9-92FS-96FS White Pearl Coin \$80.00



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### 1911 Full Sized White Pearl Colt Coin Blue

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SKU 019111002

In stock

**\$60.00**

Qty

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Fits all full sized 1911 Semi Autos Pistols.  
Including Combat Commanders, Government Models, Colt, Kimber, Springfield Armory, .38 Super, 9mm, 10mm, .22LR. THEY DO NOT FIT ANY COMPACT VERSIONS. DO NOT FIT LLAMA OR BALLISTA MOLINA PISTOLS.

#### You May Also Like



1911 Full Sized Black Pearlite Colt Gold



1911 Full Size Ivory Polymer with Silver

Medallion

\$60.00

Colt Medallion

\$45.00

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### AJAX® Premium Coin Series

Grips are available in most white or black Pearlite® models. AJAX® coin inlays are made of steel overlaid with colored enamels to match most gun manufacturers factory colors. They are gorgeous and add character and a factory look to most guns. The coins are inlaid by CNC precision cut holes and finished by hand to get a clear window overcoat to give them luster. Give 'em a look, you will love them. Call for availability as more models are coming throughout the year. Also, Colt factory medallions are available installed on all Colt grip models. These are available in gold or silver.





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AJAX® Premium Coin Series Grips are available in most white or black Pearlite® models. AJAX® coin inlays are made of steel overlaid with colored enamels to match most gun manufacturers factory colors. They are gorgeous and add character and a factory look to most guns. The coins are inlaid by CNC precision cut holes and finished by hand to get a clear window overcoat to give them luster. Give 'em a look, you will love them. Call for availability as more models are coming throughout the year. Also, Colt factory medallions are available installed on all Colt grip models. These are available in gold or silver.

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Baretta M9-92SF-96FS Blue Vapor M9-92SF-96FS White M9-92SF-96FS Black Pearlite Coin Coin

\$80.00

\$80.00

\$80.00



Colt SAA Ivory Polymer Grip Medallion  
 Colt New England J Frame 9RB White  
 Pearlite Medallion

\$50.00

\$55.00

\$60.00



1911 Full Sized White Pearlite Coin  
 Colt Small Black Pearlite Coin  
 White Colt Gold Colt Black Pearlite Coin  
 Medallion

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\$60.00

\$60.00

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### 1911 Full Sized White Pearl Colt Coin Blue

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SKU 019111002

In stock

**\$60.00**

Qty

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Fits all full sized 1911 Semi Autos Pistols.  
Including Combat Commanders, Government Models, Colt, Kimber, Springfield Armory, .38 Super, 9mm, 10mm, .22LR. THEY DO NOT FIT ANY COMPACT VERSIONS. DO NOT FIT LLAMA OR BALLISTA MOLINA PISTOLS.

#### You May Also Like



1911 Full Sized MarbleLite Red



1911 Full Sized Black Pearlite Colt Gold

Medallion

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\$60.00

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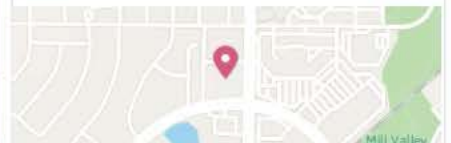
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2145 N. Josey Ln. Suite 116-123  
Carrollton, Texas, TX 75006

(214) 533-1911

[www.AjaxCustomGrips.Com](http://www.AjaxCustomGrips.Com)

Outdoor & Sporting Goods Company

People

623 likes

Reviews

4.2

5 Reviews

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or





Patricia D. Apperson

August 29, 2016

Awesome grips.. You'll always be satisfied with the grips you choose

See All



NRA's American Rifleman (Official)



NRA America's 1st Freedom

Places Carrollton, Texas Ajax Grips, LLC

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Ajax Grips, LLC

December 19, 2016 Carrollton, TX

New website just launched. Please come visit us at [www.AjaxGripsLLC.com](http://www.AjaxGripsLLC.com)



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Will C Harris, Joe Dawson Cheavens, Clint Thompson and 23 others like this. Top Comments

2 shares

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Ajax Grips, LLC updated their cover photo.

July 9, 2016



Like Comment

Francesca Dal Pozzo, Kurt Mellendorf, Kenneth Manuel and 3 others like this. Top Comments

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See All

Posts



**Ajax Grips, LLC** added 4 new photos.  
June 30, 2016

New Ajax MarbleLite Sig grips with Stainless SIG coin inlaid. Available soon...Probably early August, to fit both Sig P238 & P938



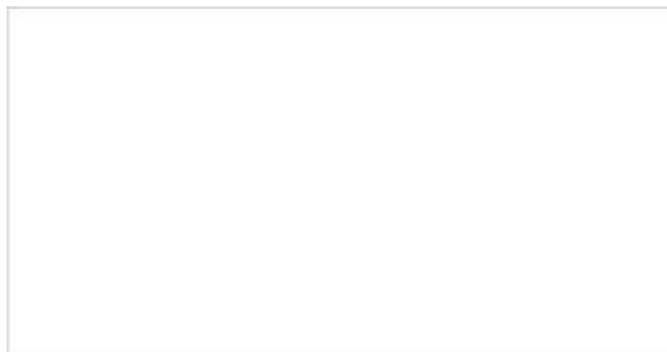
Like Comment

Kenneth Manuel, John Mayhugh and 2 others like this.



**Ajax Grips, LLC**  
December 1, 2014

Free Shipping on orders over \$100 at [www.ajaxgrips.com](http://www.ajaxgrips.com)! 12/01/2014 through 12/07/2014



Welcome To Ajax Custom Grips LLC!

[www.ajaxgrips.com](http://www.ajaxgrips.com)  
[WWW.AJAXGRIPS.COM](http://WWW.AJAXGRIPS.COM)

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Top Comments



**Ajax Grips, LLC** Thank you for the kind words. We're coming out with new and different items all this year, so keep your eyes open!  
May 6, 2016 at 12:49pm



**Ajax Grips, LLC** Thanks. Sorry nothing at all like this.

AjaxGrips  
May 5, 2016 at 10:20pm  
1 Reply

[View 2 more comments](#)



**Ajax Grips, LLC**  
November 29, 2014

<http://m.ebay.com/itm/121500126591?nav=SEARCH>



**1911 Grips -White Gen 3 Pearlite with Gold Colt Medallions -Ajax**

These are Ajax's newest innovation on our world famous Pearlite Product.  
[M.EBAY.COM](http://M.EBAY.COM)

[Like](#) [Comment](#) [Share](#)

Dan Young, Matthew Malec and 33 others like this.



**Ajax Grips, LLC**  
November 28, 2014

Don't forget Ajax Grips for Holiday Gifts ... For yourself or someone else - nothing dresses up a gun like a great pair of grips!



[Like](#) [Comment](#)



**Ajax Grips, LLC**  
November 8, 2014

Come See us at The Tulsa Gun Show –downstairs Row 13 North Side by the SnackBar! One of our best selections ever and you can't beat the prices.

Like Comment



**Ajax Grips, LLC** updated their profile picture.  
October 25, 2014



Like Comment

Miguel Omar Gutierrez and Ajax Grips, LLC like this.



**Ajax Grips, LLC**  
October 25, 2014

The latest Ajax offering....we've got Punishers!  
<http://pages.ebay.com/link/...>

pages.ebay.com

<http://pages.ebay.com/link/?nav=item.view&alt=web&id=201200662738>

PAGES EBAY.COM

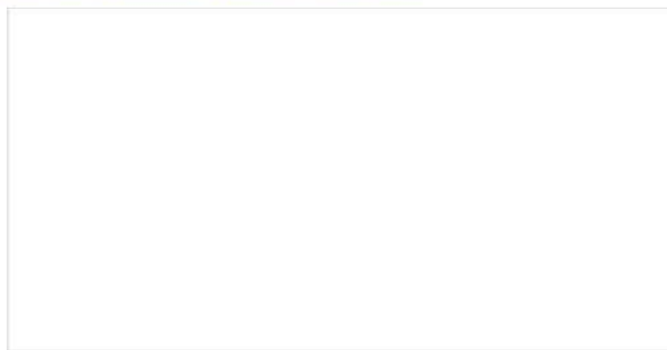
Like Comment Share



**Ajax Grips, LLC**  
August 3, 2014

Check out our top selling grips for the 1911 and browse the rest of our website for other great options!

<http://www.ajaxcustomgrips.com/1911Grips.html>



Welcome To Ajax Custom Grips brought to you by 2R L.L.C.

<http://www.ajaxcustomgrips.com/1911Grips.html>  
WWW.AJAXCUSTOMGRIPS.COM

Like Comment Share

Dv Vongvixay, James Colby Newsome, Corey Brackett and 66 others like this.

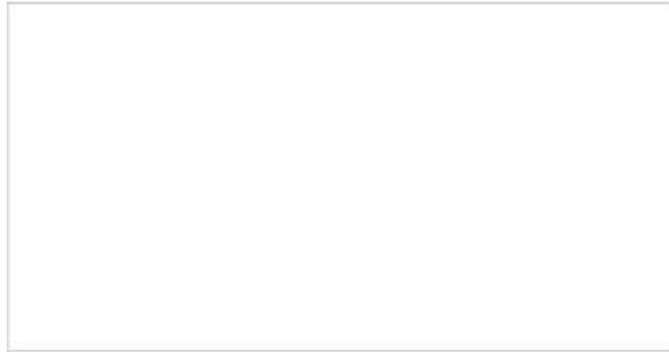
1 share



**Ajax Grips, LLC**  
May 28, 2014

Check out this weeks eBay special!

<http://www.ebay.com/itm/201098229206>



**Ruger Blackhawk, Vaquero or Single Six (Red) Grips - Ajax Ivory Polymer**

Ajax™ Ivory Polymer Grips for the Ruger Blackhawk, Vaquero, and Single Six (red) #31-ip Ajax. 50+ year history of the finest Handgun Grips available. We  
WWW.EBAY.COM

Like Comment Share

Sue Ellen Wayson Curtis, Dennis Landreth, John Pickelsimer and 28 others like this. [Top Comments](#)



**Ajax Grips, LLC** Remember we are always available at [www.ajaxgrips.com](http://www.ajaxgrips.com) !  
1 May 28, 2014 at 6:58pm



**Ajax Grips, LLC** More products at great prices keep coming—check out [www.ajaxgrips.com](http://www.ajaxgrips.com)  
June 17, 2014 at 9:09pm

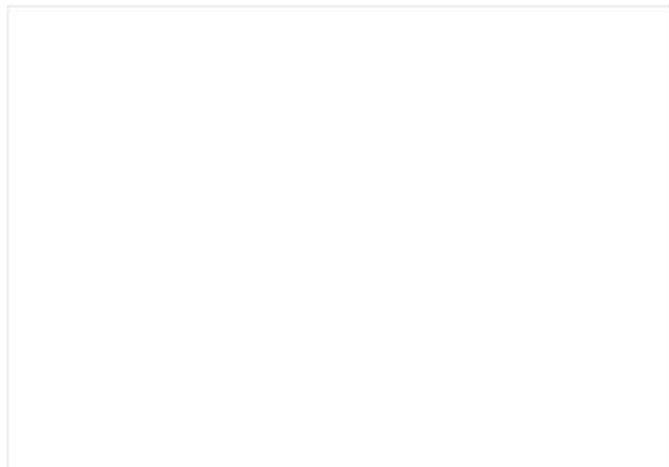
[View 3 more comments](#)



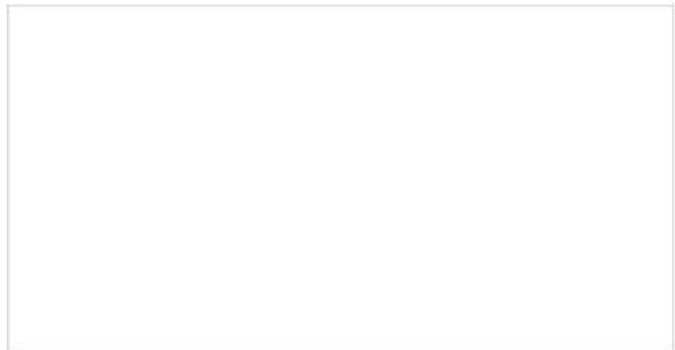
**Ajax Grips, LLC**  
May 25, 2014

<http://www.ebay.com/itm/201095793492>

For everyone asking for medallions we have them on eBay.







**1911 Grips - White Pearlite With Silver Plated Colt Medallions -Ajax**

Pearlite is a registered trademark of Ajax Custom Grips - if it's not Ajax it's not Pearlite. Ajax - White Pearlite Grips for full size 1911. Brand new in packaging  
WWW.EBAY.COM

Like Comment Share

Justin Callaway, Ajax Grips, LLC and Carolyn Darr Ritter like this.



**Ajax Grips, LLC**  
May 7, 2014

<http://www.ebay.com/itm/201084939455>

One of our new offerings!



**1911 Grips -Stabilized Spruce Cone (Turquoise) Ajax™**

US \$135.00 New in Sporting Goods, Hunting, Gun Parts

WWW.EBAY.COM

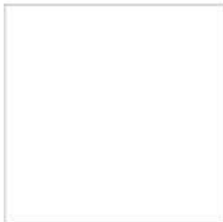
Like Comment Share

Ajax Grips, LLC likes this.



**Ajax Grips, LLC**  
May 6, 2014

Check out smoking deals on Ajax Grips! Free shipping and new low prices on 1911 Grips and others.



**1911 Grips -Ajax IVORY Polymer**

US \$38.50 New in Sporting Goods, Hunting, Gun Parts

WWW.EBAY.COM

Like Comment Share

Jeff Emory, Joseph Scalora and 24 others like this.

[Top Comments](#)



**Ajax Grips, LLC** Due to overwhelming success they are now at \$35.00  
May 15, 2014 at 4:07pm



**Ajax Grips, LLC** These are great!  
May 7, 2014 at 6:45am

[View 1 more comment](#)



**Ajax Grips, LLC**  
April 2, 2014

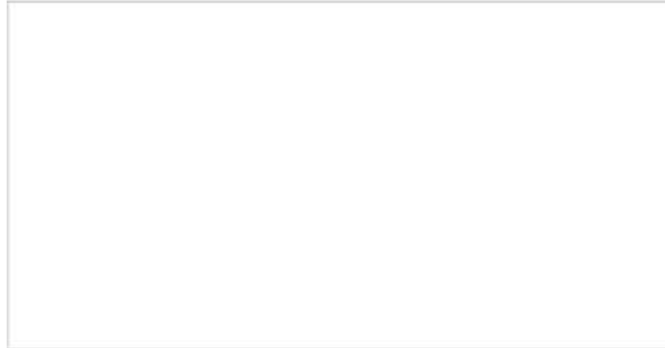
We will be at our normal location at this weekends Tulsa Arms Show.  
Downstairs on the North Side across from the Snack Bar.

Like Comment



**Ajax Grips, LLC**  
February 7, 2014

10% Off grips on our website [www.ajaxcustomgrips.com](http://www.ajaxcustomgrips.com)  
Use code thanksthr



Welcome To Ajax Custom Grips brought to you by 2R  
L.L.C.

[www.ajaxcustomgrips.com](http://www.ajaxcustomgrips.com)  
[WWW.AJAXCUSTOMGRIPS.COM](http://WWW.AJAXCUSTOMGRIPS.COM)

Like Comment Share

Steven Price likes this.

[See More](#)

# **EXHIBIT D**





# Cantor Colburn LLP

Intellectual Property Attorneys

Steven M. Coyle  
scoyle@cantorcolburn.com  
Partner

HARTFORD  
20 Church Street  
22nd Floor  
Hartford, CT 06103  
phone: 860-286-2929  
fax: 860-286-0115

April 24, 2017

**VIA FIRST CLASS MAIL**

WASHINGTON, D.C.  
1800 Diagonal Road  
Suite 400  
Alexandria, VA 22314  
phone: 703-236-4500  
fax: 703-236-4501

Ajax Grips LLC  
P.O. Box 110338  
Carrollton, TX 75011-0338

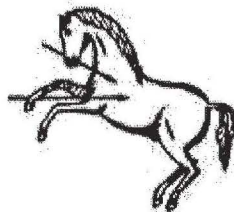
**RE: Violation of Colt's Manufacturing Company LLC's  
Intellectual Property Rights**

ATLANTA  
1180 Peachtree Street  
Suite 2050  
Atlanta, GA 30309  
phone: 404-607-9991  
fax: 404-607-9981

Dear Sir/Madam:

HOUSTON  
2603 Augusta Drive  
Suite 1270  
Houston, TX 77057  
phone: 713-266-1130  
fax: 713-266-8510

This law firm represents Colt Manufacturing IP Holding Company, LLC ("Colt") in various intellectual property matters. As you are likely aware, Colt is the owner of numerous famous trademarks, including but not limited to U.S. Trademark Registration No. 0049430 for COLT, Registration No. 3380438 for COLT (stylized) and Design, Registration No. 1599500 for COLT (stylized) and Design, Registration No. 3377544 for RAMPANT COLT design, and Registration No. 0052904 for COLT (stylized) and Design, (collectively, the "COLT Marks"), examples of which are shown as follows:

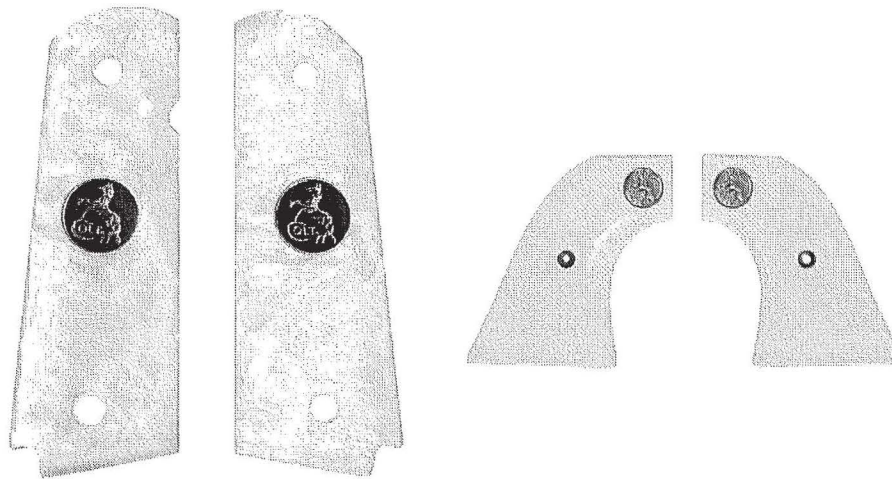


[www.cantorcolburn.com](http://www.cantorcolburn.com)

April 24, 2017

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It has come to our attention that Ajax Grips LLC (“Ajax”) has been infringing upon Colt’s trademark rights. In particular, Colt recently learned that Ajax is selling imitation pearl grips inlaid with steel Colt medallions bearing the COLT Marks on its website <http://www.ajaxgripsllc.com/index.html>, examples of which are below.



Colt has also learned that Ajax is advertising that the imitation medallions are installed on all Colt grip models, which include 1911 and single actions army models. Ajax is also advertising these products on its Facebook page at <https://www.facebook.com/AjaxGrips/>.

Ajax’s use of COLT Marks in connection with firearms and/or firearm parts as set forth above is likely to confuse, deceive, and/or mislead consumers into believing that your products originate from Colt and/or that Colt has endorsed, sponsored or otherwise approved of such use. Under these circumstances, Ajax’s conduct constitutes infringement of Colt’s federal trademark registrations in violation of § 32 of the Lanham Act, comprises acts of unfair competition in violation of § 43(a) of the Lanham Act and the Connecticut Unfair Trade Practices Act (“CUTPA”), and may violate other applicable state and federal statutory and/or common law applicable state statutory and common law. Ajax’s infringement entitles Colt to injunctive relief, damages, and potentially the recovery of attorney’s fees should Colt be forced to bring a suit to enforce its valuable trademark rights.

April 24, 2017

Page | 3

With the foregoing in mind, Colt hereby demands the following:

1. That Ajax cease and desist from any use of the COLT Marks on any rifles, pistols or other weapons, and/or in connection with parts or components thereof;
2. That Ajax immediately destroy any and all marketing or promotional materials, including any electronic versions thereof, that bear the COLT Marks;
3. That Ajax provide Colt with the identity and contact information of any distributors who have purchased any Ajax products bearing the COLT name or trademarks;
4. Provide Colt with an accounting of all sales of all products bearing the COLT Marks and/or any product bearing a component that bears the COLTS Marks, so that we may properly assess appropriate compensation to Colt for Ajax's acts of trademark infringement; and
5. That Ajax comply with these demands within fourteen (14) days of the date of this letter.

Please confirm within fourteen (14) days that Ajax has complied with the above demands. Failure to provide such information may result in legal action against you without further notice, including but not necessarily limited to a lawsuit seeking injunctive relief, damages, and/or attorney's fees as appropriate. This correspondence is without prejudice to Colt's rights and remedies, all of which are expressly reserved.

We look forward to hearing from you.

Sincerely,



Steven M. Coyle, Esq.

SMC/kcm