

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

ABC IP, LLC, a Delaware limited liability company, and RARE BREED TRIGGERS, INC., a Texas corporation,

Plaintiffs,

vs.

TIMOTHY HOFFMAN, an individual, and HOFFMAN TACTICAL LLC, a Tennessee limited liability company,

Defendants.

Case No. 1:25-cv-00389-CLC-CHS

**TEMPORARY RESTRAINING ORDER  
UNDER RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

This matter came before the Court on January 13, 2026, in connection with the Motion for Temporary Restraining Order with Incorporated Brief in Support (Dkt. 15) (“TRO Motion”), filed on January 9, 2026, by Plaintiffs, ABC IP, LLC and Rare Breed Triggers, Inc. (collectively, “Plaintiffs”). Based on the TRO Motion and documents submitted in support thereof, and following the January 13, 2026, hearing, at which counsel for both Plaintiffs and Timothy Hoffman and Hoffman Tactical, LLC (collectively, “Defendants”) appeared and presented arguments, the Court finds that the four factors to be considered in connection with a request for a TRO, *i.e.*, (1) the movant’s likelihood of success on the merits; (2) whether the movant will suffer irreparable injury without an injunction; (3) whether granting the injunction would cause substantial harm to others; and (4) whether the public interest would be served by granting the injunction, *see McNeilly v. Land*, 684 F.3d 611, 615 (6th Cir. 2012) are met in this case and **GRANTS** the TRO Motion.

For a period of fourteen (14) days from the date of entry of this Order, Defendants and

their principals, agents, attorneys, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith are **ORDERED** to refrain from infringement or contributing to the infringement of Patent No. 12,038,247 and Patent No. 12,031,784 during the term of this Order as follows:

- a. Refrain from making, using, selling, offering for sale, or importing any of the accused Infringing Devices, whether for the purpose of use or offering such products for sale, whether by retail, through distributors, or wholesale;
- b. Remove the “Super Safety” Infringing Devices for free download on Odysee.com, as well as any other platform for downloads by consumers.
- c. Refrain from posting any of the Infringing Designs in the form of 3D Print files, STEP files, or Developer’s Packs (DEV Pack) on any platform;
- d. Refrain from sending any of the Infringing Designs in the form of 3D Print files, STEP files or DEV Packs either physically or electronically to any third party; and
- e. Refrain from licensing or attempting to license any third party for the purpose of selling, offering for sale, importing, distributing, promoting the Infringing Devices and Infringing Designs.

The Court sets an injunction bond in the amount of \$20,000.00. Plaintiffs are **ORDERED** to remit payment to the Clerk of Court promptly.

The Court further **ORDERS** that a hearing on Defendants’ Motion for Preliminary Injunction with Incorporated Brief in Support (Dkt. 16) be set before the undersigned on **January 27, 2026, at 2:00 p.m. Eastern time.**

**SO ORDERED**, this 13th day of January, 2026.

/s/

Honorable Curtis L. Collier  
United States District Judge