

**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

**PRELIMINARY INJUNCTION**

Before the Court is the motion of Plaintiffs, ABC IP, LLC (“ABC”) and Rare Breed Triggers, Inc. (“Rare Breed”), for a preliminary injunction against Defendants, Timothy Hoffman (“Hoffman”) and Hoffman Tactical LLC (“Hoffman Tactical”), in connection with Plaintiffs’ claims of patent infringement. (Doc. 14.) Defendants responded in opposition. (Doc. 26.) The Court held a hearing on Plaintiffs’ motion on January 27 through 29, 2026. (Docs. 31, 33, 34.) Plaintiffs and Defendants submitted their respective proposed findings of fact and conclusions of law on February 5, 2026. (Docs. 40, 41.) Based on the parties’ written submissions and the evidence and argument presented during the hearing, and for the reasons set out in the accompanying Memorandum, the Court **GRANTS** Plaintiffs’ motion for a preliminary injunction (Doc. 14).

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 the Super Safety device or any derivatives of it, whether for the purpose of use or offering such products for sale, and whether by retail, through distributors, or wholesale;
- b. If not already completed, remove the “Super Safety” Infringing Devices for free download on Odysee.com, as well as any other platform for downloads by consumers, and not re-post the same;
- 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 version of the Super Safety device 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, or promoting the Super Safety or derivative designs.

Plaintiffs’ \$20,000 injunction bond, as ordered upon the issuance of the Temporary Restraining Order (Doc. 20), shall continue.

**SO ORDERED.**

**ENTER:**

/s/  
**CURTIS L. COLLIER**  
**UNITED STATES DISTRICT JUDGE**