



Plaintiffs ABC IP, LLC (“ABC”) and Rare Breed Triggers, Inc. (“RBT”) (collectively, “Plaintiffs”), through undersigned counsel, hereby move this Court pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1 for entry of a Temporary Restraining Order and Preliminary Injunction enjoining Defendants Peak Tactical, LLC (“Peak”) and Nicholas Norton and their officers, agents, servants, employees, and attorneys, and any other person(s) in concert or participation with any of the foregoing people or entities, from (A) making, using, offering to sell, selling, or importing the accused Partisan Disruptor product, or any substantially identical product, and (B) stating publicly in commercial advertising that (i) the accused Partisan Disruptor practices U.S. Patent No. 9,146,067, and/or that (ii) the accused Partisan Disruptor is an assisted reset trigger.

This Motion is based on the Complaint (Dkt. 1), the Memorandum in Support filed concurrently herewith, the declarations and exhibits attached thereto, any additional materials that Plaintiffs may file in support of this Motion before or at any hearing on the Motion, and any oral argument requested by this Court.

Dated: January 16, 2026

Respectfully submitted,

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*ABC IP, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 16, 2026, a copy of the foregoing was filed electronically using the CM/ECF system, which will send notification of such filing to counsel of record.

/s/ Travis W. Koch

Travis W. Koch