

**BEFORE THE UNITED STATES JUDICIAL PANEL ON  
MULTIDISTRICT LITIGATION**

In re: Disruptor Patent Litigations

MDL No. \_\_\_\_\_

**MOTION OF DEFENDANTS FOR TRANSFER OF ACTIONS TO THE DISTRICT OF  
WYOMING PURSUANT TO 28 U.S.C. § 1407 FOR COORDINATED OR  
CONSOLIDATED PRETRIAL PROCEEDINGS**

Pursuant to 28 U.S.C. § 1407(c)(ii) and J.P.M.L. Rules 6.1(b) and 6.2, Defendants Peak Tactical, LLC; Nick Norton; SGC, LLC; Terence Schmidt; Ronald Kennedy; WebCorp, Inc.; TJ Kirgin; Hawkphin Sales, LLC; Adam Gerleman; Cloak Industries, Inc.; William King, Jr.; Firearm Systems, LLC, Brandon Donatto; Michael Stakes; AR-TT LLC; Clausen Inc.; Jonathan Clausen; Jodi Clausen; and Canuck Tactical LLC (altogether, “Movants”) respectfully move the Judicial Panel on Multidistrict Litigation for an order transferring for coordinated or consolidated proceedings ten patent infringement cases in nine different federal district courts (the “Disruptor Actions”) filed by ABC IP, LLC and Rare Breed Triggers, Inc. (together, “Rare Breed”) against the makers and sellers of the Disruptor trigger mechanism (the “Disruptor Defendants”). *See Exhibit 12* (Schedule of Actions).

1. As set forth in detail in the attached brief (**Exhibit 1**), the Panel should centralize the Disruptor Actions because they implicate the same product that, in all ten cases, Rare Breed accuses of patent infringement under the same four patents.

2. As a result, document discovery, fact witnesses, expert evidence, and legal determinations will overlap substantially, if not entirely, among the Disruptor Actions.

3. Centralization therefore will serve the convenience of witnesses and the parties, and it will contribute to a just and efficient resolution of these matters.

4. Centralization should be ordered only as to the Disruptor Actions because other cases that Rare Breed proposes for consolidation lack factual commonality with the Disruptor Actions.

5. Centralization of the Disruptor Actions should be in Wyoming, which is the center of gravity for the Disruptor Actions, with a federal district court and chief judge optimally positioned to administer centralized proceedings.

WHEREFORE, Movants respectfully request that the Panel enter an order transferring the Disruptor Actions listed in the Schedule of Actions in Exhibit 12, and all tag-along actions against Disruptor sellers, to the United States District Court for the District of Wyoming for coordinated or consolidated pretrial proceedings before the Honorable Kelly H. Rankin.

Dated: March 19, 2026

HOLLAND & HART LLP

*s/ Paul D. Swanson*

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