RIDGE CORP. v. KIRK NATIONALEASE CO., Appeal No. 2025-1254 (Fed. Cir. July 13, 2026). Before Dyk, Mayer, and Taranto. Appealed from S.D. Ohio (Judge Marbley).

Background:

Cold Chain, LLC owns a patent directed to "an insulated overhead door" to which Ridge Corporation became an exclusive licensee. Ridge Corporation and Cold Chain ("Plaintiffs") moved for a preliminary injunction, and the district court granted that preliminary injunction, enjoining Defendants from selling their accused roll-up door and any other door that infringes the patent. Defendants appealed.

Issue/Holding:

Did the district court err by granting Plaintiffs preliminary injunctive relief? Yes, reversed and remanded.

Discussion:

The Federal Circuit reviewed the district court's grant of preliminary injunction for abuse of discretion and noted that a preliminary injunction can only be granted when the following four factors weigh in favor of injunctive relief: where a plaintiff can (1) establish that he is likely to succeed on the merits, (2) that he is likely to suffer irreparable harm in the absence of preliminary relief, (3) that the balance of equities tips in his favor, and (4) that an injunction is in the public interest.

The Federal Circuit first reviewed whether Defendants raised a substantial question concerning infringement. In particular, the Federal Circuit considered three disputed claim limitations, for each of which the Federal Circuit agreed that Defendants raised a substantial question. For instance, the asserted claims require an "insulated overhead door." Defendants argued that, although their accused door had foam material, it was not intended as an insulated door. Defendants' expert further elaborated that there are both dry-freight and insulated roll-up doors within the industry. The Federal Circuit held that there was a substantial question about infringement given the expert's finding and the fact that "insulated" was a requirement of the "insulated overhead door."

The court then considered the district court's conclusion that Plaintiffs were likely to suffer irreparable injury absent injunctive relief. Plaintiffs argued that they had been forced to sell their doors at reduced prices due to Defendants' alleged infringement, but the Federal Circuit held that there was no causal nexus between the reduced prices and the alleged infringement. Plaintiffs had yet to sell any door prior to injunctive relief having been granted, and they thereafter had the field to themselves. Thus, the Federal Circuit held that Defendants could not have been eroding the price of Plaintiffs' doors at that time. Additionally, although Plaintiffs asserted that Defendants incorrectly stated that the accused door was subject to a pending patent application and allegedly interfered with Plaintiffs' business relationships (i.e. by sending letters threatening royalty damages), Plaintiffs failed to assert evidence that such conduct was likely to reoccur.

Plaintiffs having failed to meet the first two factors, the Federal Circuit held that the district court abused its discretion by granting injunctive relief to Plaintiffs.