

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO

CentralSquare Technologies, LLC v. The National Board of Boiler
and Pressure Vessel Inspectors

CentralSquare Technologies · No. 2:25-CV-774 · Decided March 17, 2026

SUMMARY

The United States District Court for the Southern District of Ohio addresses a patent-infringement action involving CentralSquare Technologies’ ’304 patent and the National Board of Boiler and Pressure Vessel Inspectors’ Jurisdictional Reporting System. The court grants the defendant’s Rule 12(b)(6) motion, concluding that the asserted patent claims are directed to an abstract idea and lack an inventive concept under the Alice framework. The court dismisses the complaint without prejudice, denies leave to file a sur-reply, and grants an unopposed motion to amend infringement contentions.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio
WRITING FOR THE COURT	Algenon L. Marbley
JURISDICTION	United States District Court for the Southern District of Ohio
DECIDED	March 17, 2026
DOCKET	2:25-CV-774
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved to dismiss the patent-infringement complaint under Federal Rule of Civil Procedure 12(b)(6) on the ground that the asserted patent claims were patent-ineligible under 35 U.S.C. § 101. Plaintiff also moved for leave to file a sur-reply and moved unopposed to amend its infringement contentions.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court construes the pleading in the light most favorable to the nonmoving party, accepts well-pleaded factual allegations as true, and draws reasonable inferences in that party's favor, but need not accept legal conclusions or threadbare recitals. Patent eligibility is a question of law that may contain underlying factual questions and may be resolved at the pleading stage when the allegations do not prevent resolution as a matter of law.

PRECEDENTIAL VALUE	unpublished district court opinion; persuasive only
PARTIES	CentralSquare Technologies, LLC v. The National Board of Boiler and Pressure Vessel Inspectors

TOPICS

patent eligibility patent infringement motions to dismiss motion to amend civil procedure

PRACTICE AREAS

patent law patent eligibility civil procedure commercial litigation

QUESTIONS PRESENTED

1. Whether the court should permit CentralSquare to file a sur-reply.
2. Whether claim 1 was representative of the asserted patent claims for purposes of the § 101 analysis, including claims 22 and 38 discussed by CentralSquare.
3. Whether claim construction was required before resolving patent eligibility under § 101.
4. Whether the asserted claims were directed to the abstract idea of managing, transferring, storing, and reviewing inspection data among entities and jurisdictions using conventional computer components.
5. Whether the asserted claims contained an inventive concept sufficient to transform the abstract idea into patent-eligible subject matter.
6. Whether the complaint should be dismissed without prejudice and whether CentralSquare should be permitted to amend its complaint and infringement contentions.

HOLDINGS

1. Leave to file a sur-reply was properly denied because NBBI's reply did not raise new arguments and the additional filing was unnecessary.
2. Claim 1 was representative of the patent's claims for the § 101 analysis, while the court also considered claims 22 and 38 because CentralSquare expressly discussed them.
3. Claim construction was not required before resolving patent eligibility because CentralSquare did not identify a proposed construction or explain how a different construction would alter the eligibility analysis.
4. The asserted claims of Patent No. 7,181,304 were patent-ineligible because they were directed to the abstract idea of organizing and transferring inspection data among entities and jurisdictions using conventional computer components and lacked an inventive concept.
5. The complaint was dismissed without prejudice, and CentralSquare was permitted to file an amended complaint addressing the deficiencies identified in the opinion.

FACTUAL BACKGROUND

CentralSquare owns the Jurisdiction Online software platform for managing boiler, pressure-vessel, elevator, and other required inspections across jurisdictions and entities. The USPTO issued CentralSquare's predecessor Patent No. 7,181,304 in 2007. NBBI later launched the Jurisdictional Reporting System, an online platform for tracking similar inspection and regulatory information, and CentralSquare alleged that the system directly infringed at least claim 1 of the patent.

PROCEDURAL HISTORY

CentralSquare filed the patent-infringement complaint on July 11, 2025. NBBI moved to dismiss, CentralSquare opposed and sought leave to file a sur-reply, and CentralSquare later moved unopposed to amend its infringement contentions. The court denied leave to file the sur-reply, granted dismissal without prejudice, granted leave to amend the complaint subject to curing the identified deficiencies, and granted the unopposed motion to amend infringement contentions.

DISPOSITION

dismissed

CASES CITED

- Liberty Legal Found. v. Nat'l Democratic Party of the USA, Inc., 875 F. Supp. 2d 791, 797 (W.D. Tenn. 2012)
- Key v. Shelby Cnty., 551 F. App'x 262, 265 (6th Cir. 2014)
- Seay v. Tenn. Valley Auth., 339 F.3d 454, 481 (6th Cir. 2003)
- Nat'l City Bank v. Aronson, 474 F. Supp. 2d 925, 930 (S.D. Ohio 2007)
- Directv, Inc. v. Treesh, 487 F.3d 471, 476 (6th Cir. 2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Weiner v. Klais & Co., 108 F.3d 86, 89 (6th Cir. 1997)
- Bassett v. NCAA, 528 F.3d 426, 430 (6th Cir. 2008)
- Berkheimer v. HP Inc., 881 F.3d 1360, 1365, 1368 (Fed. Cir. 2018)
- Aatrix Software, Inc. v. Green Shades Software, Inc., 882 F.3d 1121, 1125 (Fed. Cir. 2018)
- Kit Check, Inc. v. Health Care Logistics, Inc., 2019 WL 1200738, at *3-*4 (S.D. Ohio Mar. 14, 2019)
- Zimmers v. Eaton Corp., 2016 WL 4094870, at *5 (S.D. Ohio Aug. 2, 2016)
- Horizon Glob. Americas Inc. v. Continental Automotive Systems, Inc., 2021 WL 795569, at *982, *985 (E.D. Mich. Mar. 2, 2021)
- Biotec Biologische Naturverpackungen GmbH v. Biocorp, Inc., 249 F.3d 1341, 1353 (Fed. Cir. 2001)
- Content Extraction & Transm. LLC v. Wells Fargo Bank, Nat. Ass'n, 2013 WL 3964909, at *5 (D.N.J. July 31, 2013), *aff'd*, 776 F.3d 1343 (Fed. Cir. 2014)
- Truveris, Inc. v. Skysail Concepts, LLC, 2022 WL 4537071, at *27-*28 (N.D. Ohio Sept. 28, 2022)
- Bancorp Servs., LLC v. Sun Life Assur. Co. of Canada (U.S.), 687 F.3d 1266, 1273 (Fed. Cir. 2012)

- Cybergenetics Corp. v. Institute of Environmental Science & Research, 490 F. Supp. 3d 1237, 1242 (N.D. Ohio 2020), *aff'd*, 856 F. App'x 312 (Fed. Cir. 2021)
- Burnett v. Panasonic Corp., 741 F. App'x 777, 783 (Fed. Cir. 2018)
- Alice Corp. Pty. v. CLS Bank International, 573 U.S. 208, 217-18, 221, 223 (2014)
- Diamond v. Chakrabarty, 447 U.S. 303, 309 (1980)
- Gottschalk v. Benson, 409 U.S. 63, 67 (1972)
- Mayo Collaborative Servs. v. Prometheus Labs., Inc., 566 U.S. 66, 72, 78-79 (2012)
- Chamberlain Grp., Inc. v. Techtronic Indus. Co., 935 F.3d 1341, 1346 (Fed. Cir. 2019)
- Enfish LLC v. Microsoft Corp., 822 F.3d 1327, 1338 (Fed. Cir. 2016)
- Bilski v. Kappos, 561 U.S. 593, 611 (2010)
- McRO, Inc. v. Bandai Namco Games America Inc., 837 F.3d 1299, 1314 (Fed. Cir. 2016)
- FairWarning IP, LLC v. Iatric Systems, Inc., 839 F.3d 1089, 1094 (Fed. Cir. 2016)
- Credit Acceptance Corp. v. Westlake Services, 859 F.3d 1044, 1055, 1057 (Fed. Cir. 2017)
- BASCOM Global Internet Services, Inc. v. AT & T Mobility LLC, 827 F.3d 1341, 1350-51 (Fed. Cir. 2016)
- Intellectual Ventures I LLC v. Capital One Financial Corp., 850 F.3d 1332, 1342 (Fed. Cir. 2017)
- Cellspin Soft, Inc. v. Fitbit, Inc., 927 F.3d 1306, 1316-17 (Fed. Cir. 2019)
- Cardiacsense LTD v. Garmin Internatl., Inc., 776 F. Supp. 3d 644, 653 (E.D. Mich. 2025)
- PR Diamonds, Inc. v. Chandler, 364 F.3d 671, 698 (6th Cir. 2004)
- 3rd Eye Surveillance, LLC v. United States, 140 Fed. Cl. 39, 52 (Fed. Cl. 2018)
- Spitzer Autoworld Akron, LLC v. FCA US LLC, 2023 WL 4842669, at *1 (N.D. Ohio Feb. 8, 2023)