

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Miller Manufacturing Company v. Tractor Supply Company

Miller · No. Civil No. 25-3099 (DWF/DLM) · Decided April 7, 2026

SUMMARY

The United States District Court for the District of Minnesota denied Miller Manufacturing Company’s renewed motion for a preliminary injunction against Tractor Supply Company as moot. The court concluded that TSC had removed the challenged webpages and Miller content, implemented safeguards against republication, and demonstrated that future reposting was unlikely, while leaving the merits of Miller’s underlying claims for later determination.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Donovan W. Frank
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	April 7, 2026
DOCKET	Civil No. 25-3099 (DWF/DLM)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff Miller Manufacturing Company moved for a preliminary injunction based on alleged trademark infringement, misleading advertising, patent infringement, deceptive trade practices, and unfair competition. The district court denied the motion as moot after finding that the challenged webpages and Miller content had been removed and that future reposting was not likely on the record presented.
STANDARD OF REVIEW	A preliminary injunction is an extraordinary remedy, and the movant bears the burden of establishing the need for relief. The court considers the Dataphase factors: threat of irreparable harm, balance of harms, likelihood of success on the merits, and the public interest.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- injunctions
- trademark infringement
- equitable relief
- intellectual property
- civil procedure

PRACTICE AREAS

intellectual property

trademark law

commercial litigation

civil procedure

equitable relief

QUESTIONS PRESENTED

1. Whether Miller's renewed motion for a preliminary injunction was moot because Tractor Supply had ceased the challenged use of Miller's content and implemented safeguards against future reposting.
2. Whether Miller demonstrated a sufficient threat of irreparable harm to support preliminary injunctive relief.

HOLDINGS

1. The motion for a preliminary injunction was moot because Tractor Supply had removed the challenged webpages and Miller content, represented that it would not reactivate the webpages without Miller's or the court's approval, and took safeguards making future reposting unlikely on the record presented.
2. Miller did not establish a sufficient threat of irreparable harm because the challenged conduct was not likely to continue and the record showed that Tractor Supply promptly corrected the reposting and implemented safeguards.

KEY QUOTATIONS

“At base, the question is whether the balance of equities so favors the movant that justice requires the court to intervene to preserve the status quo until the merits are determined.” (Discussion)

“For the reasons discussed above, the Court finds that Miller’s motion for a preliminary injunction is moot.” (Conclusion)

FACTUAL BACKGROUND

Miller manufactures and sells farm, ranch, and pet products and owns registered trademarks including TROUGH-O-MATIC®, LITTLE GIANT®, and PET LODGE®. Tractor Supply sold third-party products using Miller product images, trademarks, warranties, manuals, and a marketing video, including webpages for AgraTronix float valves. Although Tractor Supply reposted Miller content after earlier removal, it removed the content and webpages after discovering the problem, deactivated associated SKUs, disabled automated publishing functions, and required legal-department review before related content could be posted.

PROCEDURAL HISTORY

Miller filed the action on July 31, 2025, and sought preliminary injunctive relief. The parties later stipulated to stay the action pending mediation, with Tractor Supply agreeing to remove the webpages at issue and not repost them without Miller's or the court's approval. After mediation failed and the stay was lifted, Miller filed a renewed preliminary-injunction motion on March 18, 2026. The court denied the motion as moot.

DISPOSITION

other

CASES CITED

- Tumey v. Mycroft AI, Inc., 27 F.4th 657, 665 (8th Cir. 2022)
- Dataphase Sys., Inc. v. C L Sys., Inc., 640 F.2d 109, 113 (8th Cir. 1981)
- Watkins Inc. v. Lewis, 346 F.3d 841, 844 (8th Cir. 2003)
- Gen. Motors Corp. v. Harry Brown's, LLC, 563 F.3d 312, 319 (8th Cir. 2009)
- Med. Shoppe Int'l, Inc. v. S.B.S. Pill Dr., Inc., 336 F.3d 801, 805 (8th Cir. 2003)
- Snap Fitness, Inc. v. Scenic City Fitness, Inc., No. 24-cv-2803, 2024 WL 4528877, at *6, *8 (D. Minn. Oct. 18, 2024)
- Rainforest Cafe, Inc. v. Amazon, Inc., 86 F. Supp. 2d 866, 905 (D. Minn. 1999)
- Surdyk's Liquor, Inc. v. MGM Liquor Stores, Inc., 83 F. Supp. 2d 1016, 1020 (D. Minn. 2000)
- City of Mesquite v. Aladdin's Castle, Inc., 455 U.S. 283, 289 (1982)
- DF Inst., Inc. v. Marketshare Eds, No. 07-cv-1348, 2007 WL 1589525, at *8 (D. Minn. June 1, 2007)

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