

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

FLOW MOTION RESEARCH AND
DEVELOPMENT LTD,

Plaintiff,

v.

PELOTON INTERACTIVE, INC.,

Defendant.

No. 2:26-cv-610

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Flow Motion Research and Development Ltd. (“Flow Motion”) brings this action against Defendant Peloton Interactive, Inc. (“Peloton” or “Defendant”) for infringement of Flow Motion’s United States Patent Nos. 9,987,520 (“the ’520 Patent”), 11,745,055 (“the ’055 Patent”), and 12,157,035 (“the ’035 Patent”) (collectively, the “Asserted Patents”), and hereby alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement. These claims arise under the patent laws of the United States, 35 U.S.C. § 1 *et seq.*, as a result of Defendant’s infringement of the Asserted Patents.

2. Flow Motion owns the entire right, title, and interest in and to each of the Asserted Patents, and possesses all rights to sue for infringement of the Asserted Patents and recover past damages and/or royalties prior to the expiration of the Asserted Patents.

3. Without authorization from Flow Motion, Defendant makes, uses, sells, offers for sale, and/or imports into the United States equipment and systems for and methods for performance

of exercise routines, including the Peloton Row device and the later versions of the Peloton Row device and one or more remote computing systems operated and/or controlled by Peloton (the “Accused Products”).

PARTIES

4. Flow Motion is a foreign entity organized under the laws of Israel with an address of 49 Af-Al-Pi Chen Street, ZiKron Ya’Acov Israel.

5. Flow Motion’s technologies monitor and provide feedback to users performing exercises, including on exercise equipment using sensors, including motion and position sensors, and using the appearance of the exercise device and using skeletal models generated from information captured by the sensors.

6. Flow Motion’s innovative technology was conceived by Mr. Arie Shavit¹ in 2010 while attending Pilates classes.

7. Based on his observations of the class instruction, Mr. Shavit recognized the need for individuals performing exercise routines on exercise devices to receive real-time feedback regarding their physical form to perform the routines correctly and reduce the risk of injury. He further observed the difficulty the instructor faced in determining, for each segment of a class, the appropriate resistance level for each trainee, as well as the challenge of mentally tracking each participant’s performance and progress and recalling that information for subsequent classes. Drawing on his background as a multidisciplinary engineer, Mr. Shavit sought to address these challenges by improving the methods and systems for providing accurate, real-time feedback during exercise routines, and in doing so conceived the solutions embodied in the Flow Motion

¹ Mr. Shavit is also known as “Arik” Shavit.

inventions. Mr. Shavit, along with his co-inventors, subsequently developed those inventions into the systems and methods reflected in the Asserted Patents.

8. On information and belief, Defendant Peloton is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 441 Ninth Avenue, Sixth Floor, New York, New York 10001. Peloton is a global fitness and technology company that designs, develops, manufactures, markets, sells, and supports connected fitness hardware, software platforms, and subscription-based digital fitness services.

9. Peloton offers interactive exercise equipment, including connected stationary bicycles, treadmills, rowers, and related devices, together with proprietary software and content that provide real-time instruction, performance metrics, and feedback to users. Peloton distributes its products and services throughout the United States, including within this District, through retail showrooms, online sales, subscriptions, and related support services.

10. At all relevant times, Peloton has conducted substantial business operations in Texas, including maintaining corporate offices and retail locations staffed by Peloton employees, and has purposefully availed itself of the privileges of conducting business in this District.

JURISDICTION AND VENUE

11. This Court has subject matter jurisdiction over this action for patent infringement pursuant to 28 U.S.C. §§ 1331 and 1338(a).

12. This Court has personal jurisdiction over the Defendant in this action pursuant to due process and/or the Texas Long Arm Statute. Defendant has committed acts within this District giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Defendant would not offend traditional notions of fair play and substantial justice. Defendant has purposely availed itself of the laws and protections of the United

States and the State of Texas by knowingly making, using, selling, offering for sale, distributing and/or advertising the Accused Products in Texas and this District. Defendant maintains continuous and systematic contacts within this District by selling and offering for sale products and services to customers in this District and by offering for sale products and services that are used in this District. Defendant, directly or through subsidiaries or intermediaries, has regularly and systematically conducted and conducts substantial business in this District, including but not limited to: (i) making, using, offering for sale and/or selling infringing products or services in this District; (ii) engaging in at least part of the infringing acts alleged herein; (iii) purposefully and voluntarily placing one or more infringing products or services into the stream of commerce with the expectation that those products or services will be purchased and/or used by consumers in this District; and/or (iv) regularly doing or soliciting business, engaging in other persistent courses of conduct or deriving substantial revenue from goods and services provided to individuals in Texas and in this District. Defendant has targeted the State of Texas and this District by conducting regular business therein, and has placed and continues to place infringing products into the stream of commerce through an established distribution channel with the expectation and/or knowledge that they will be purchased by consumers in the State of Texas and this District.

13. Flow Motion's claims for patent infringement arise directly from and/or relate to the above-referenced activity.

14. On information and belief, Peloton is registered to do business in Texas, maintains places of business in Texas, and conducts business in Texas. Peloton has at least two places of business in this District, including a corporate campus at 6500 Chase Oaks Boulevard, Plano,

Texas 75023,² and a retail store at Legacy West, 7500 Windrose Ave., Plano, TX 75024.³ On information and belief, Peloton's Plano office houses core corporate and operational functions, including but not limited to customer operations, business operations, finance, human resources, and technology-related roles. These functions are central to Peloton's business and to the development, operation, support, and commercialization of Peloton's accused products and services.

Plano HQ

Nestled in the lively Legacy West district, the Peloton office in Plano, Texas, is where work meets play. This spot seamlessly blends Texan warmth with a cutting-edge workspace, creating a hub for collaboration and innovation in the heart of a thriving business community.

Getting to the office

The Plano Office at 6500 Chase Oaks Boulevard is located off the Spring Creek Parkway exit 31, between Maroon Lane and Superior Ave. Peloton occupies Suite 120, whose main entrance is on the south side of the building.

Source: <https://careers.onepeloton.com/en/locations/plano>

15. Peloton has publicly identified the Plano office as a major corporate hub, and Peloton's Plano location has been treated as a material employment and operations center in public workforce disclosures and reporting.⁴

16. On information and belief, Peloton has committed acts of infringement in this District, including by offering for sale, selling, demonstrating, supporting, and commercializing

² See <https://careers.onepeloton.com/en/locations/plano> (discussing "Plano HQ")

³ See <https://stores.onepeloton.com/location/peloton-plano> (listing Peloton Plano store; identifying products including the "Cross Training Row+" under Products Available).

⁴ See <https://www.prnewswire.com/news-releases/peloton-grows-plano-campus-by-more-than-100-000-square-feet-301188935.html>

the Accused Products and related services through its Plano office, Plano retail location, employees, and/or agents.

17. On information and belief, Peloton's Plano retail location offers, displays, demonstrates, sells, and/or supports the Accused Products, including Peloton Row and/or Cross Training Row+ products and related subscription services. On information and belief, Peloton employees at the Plano retail location demonstrate Form Assist and related rowing functionality to prospective customers and assist customers in purchasing and using the Accused Products.

18. Peloton has a permanent and continuous presence in Texas and a regular and established place of business in the Eastern District of Texas. Peloton may be served with process in Texas through its registered agent for service of process, Corporation Service Company d/b/a CSC – Lawyers Incorporating Service Company, located at 211 East 7th Street, Suite 620, Austin, Texas 78701, as reflected in the official records of the Texas Secretary of State.

19. Venue is proper in this District under 28 U.S.C. § 1400(b) for the reasons set forth above, including because Peloton has committed acts of infringement in this District and maintains regular and established places of business in this District.

FACTUAL ALLEGATIONS

20. This lawsuit relates to systems and methods for monitoring performance of an exercise on an exercise device using motion and position sensors and providing feedback to the user, as further described in the Asserted Patents.

A. The Asserted Patents

21. The '520 Patent is entitled "Method and System for Monitoring and Feed-Backing on Execution of Physical Exercise Routines" and issued on June 5, 2018. The named inventors on the '520 Patent are Arie Shavit, Idit Perl Shavit, and Alon Shavit. Flow Motion owns by

assignment the entire right, title, and interest in and to the '520 Patent. A true and correct copy of the '520 Patent is attached hereto as Exhibit 1.

22. The '055 Patent is entitled “Method and System for Monitoring and Feed-Backing on Execution of Physical Exercise Routines” and issued on September 5, 2023. The named inventors on the '055 Patent are Arie Shavit, Idit Perl Shavit, and Alon Shavit. Flow Motion owns by assignment the entire right, title, and interest in and to the '055 Patent. A true and correct copy of the '055 Patent is attached hereto as Exhibit 2.

23. The '035 Patent is entitled “Method and System for Monitoring and Feed-Backing on Execution of Physical Exercise Routines” and issued on December 3, 2024. The named inventors on the '035 Patent are Arie Shavit, Idit Perl Shavit, and Alon Shavit. Flow Motion owns by assignment the entire right, title, and interest in and to the '035 Patent. A true and correct copy of the '035 Patent is attached hereto as Exhibit 3.

B. The Accused Products

24. Defendant has, without Flow Motion’s authority, made, used, offered to sell, sold, and/or imported into the United States, and/or instructed others regarding the making, use, sale, offer for sale, or importation of interactive exercise equipment, including connected rowers, and related devices, together with proprietary software and content that provide real-time instruction, performance metrics, and feedback to users, that directly infringe (literally or under the doctrine of equivalents), and/or induce the infringement of, one or more claims of each of the Asserted Patents.

25. Peloton publicly describes Form Assist as using sensors to detect the position of the user’s body, calibrate the user’s stroke, analyze the resulting data, and provide real-time feedback on rowing form. Peloton further identifies sensors in the handlebar and seat that are

personally calibrated to the user's body. Form Assist displays a machine representation of the user in relation to a rower, including the seat, handle, and rowing geometry, and provides form warnings based on the user's movement through rowing stroke phases. On information and belief, to perform these functions, the Accused Products use the appearance, geometry, feature information, and/or machine representation of the rower, including at least the seat and handle, to calibrate or adjust sensor information and/or assist in generating the user representation used for Form Assist feedback.

26. The Accused Products include, without limitation, the legacy Peloton Row; the Cross Training Row+—also referred to by Peloton in certain purchasing materials as “Row+”; the Peloton Row+ Pro; and successor Peloton rowing products that implement Form Assist or materially similar accused functionality, together with the associated software, firmware, subscription services, calibration and profile data, and Peloton-controlled computing resources.

27. Defendant, directly or indirectly through its affiliates, subsidiaries, agents, customers, or other representatives, makes, uses, sells and/or offers for sale the Accused Products in the United States in this District, and/or imports the Accused Products into the United States. For example, Peloton directly uses the Accused Products when it tests, demonstrates, services, performs quality-control testing on, or otherwise operates the complete Accused Product systems; customers directly use the complete Accused Product systems when they calibrate Form Assist and initiate a Row class or other session, thereby causing the local and any remote components to operate together and obtaining the resulting feedback; and Peloton induces that customer use through specific setup instructions, calibration instructions, user manuals, on-screen prompts, support pages, and product demonstrations.

28. Defendant has had knowledge of the Asserted Patents at least since the filing and service of this Complaint.

29. The allegations set forth herein are exemplary and without prejudice to infringement contentions provided pursuant to the Court's orders and local rules. By setting forth these allegations, Flow Motion does not convey or imply any particular claim construction or the precise scope of the claims. These infringement allegations are based on currently available information and a reasonable investigation of the Accused Products. Flow Motion reserves all rights, including the right to modify this description based on information obtained during discovery.

COUNT I

DEFENDANT'S INFRINGEMENT OF U.S. PATENT NO. 9,987,520

30. Flow Motion realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

31. The claims of the '520 Patent cover, inter alia, systems and methods for monitoring performance of an exercise routine, comprising a computing device, a plurality of motion and position sensors configured to generate sensory information related to movement of a user performing the exercise routine, a database containing routine information representing at least one frame of the exercise routine, and a training module configured to track movement of the user on an exercise device, generate a skeletal model of the user from the sensory information, and compare the skeletal model to the routine information to detect dissimilarities indicating incorrect execution of the exercise routine, wherein feedback is provided to the user based on the detected dissimilarities and, in certain embodiments, the feedback is used to automatically adjust characteristics of the exercise device including difficulty level, resistance, or tension.

32. The claims of the '520 Patent present specific, non-abstract improvements to motion tracking and exercise monitoring technology. Independent Claim 1 recites a concrete system that uses motion and position sensors, skeletal model generation from sensory information, and comparison of the skeletal model to stored routine information representing optimal execution to detect dissimilarities indicating incorrect performance of an exercise routine. The claim further incorporates use of the appearance or representation of an exercise device to assist in processing sensor data. These claimed approaches therefore present specific, non-abstract improvements to the technological operation of sensor-based motion analysis.

33. The claims of the '520 Patent are valid and enforceable, and each enjoys a statutory presumption of validity under 35 U.S.C. § 282.

34. Defendant's infringing activities violate 35 U.S.C. § 271.

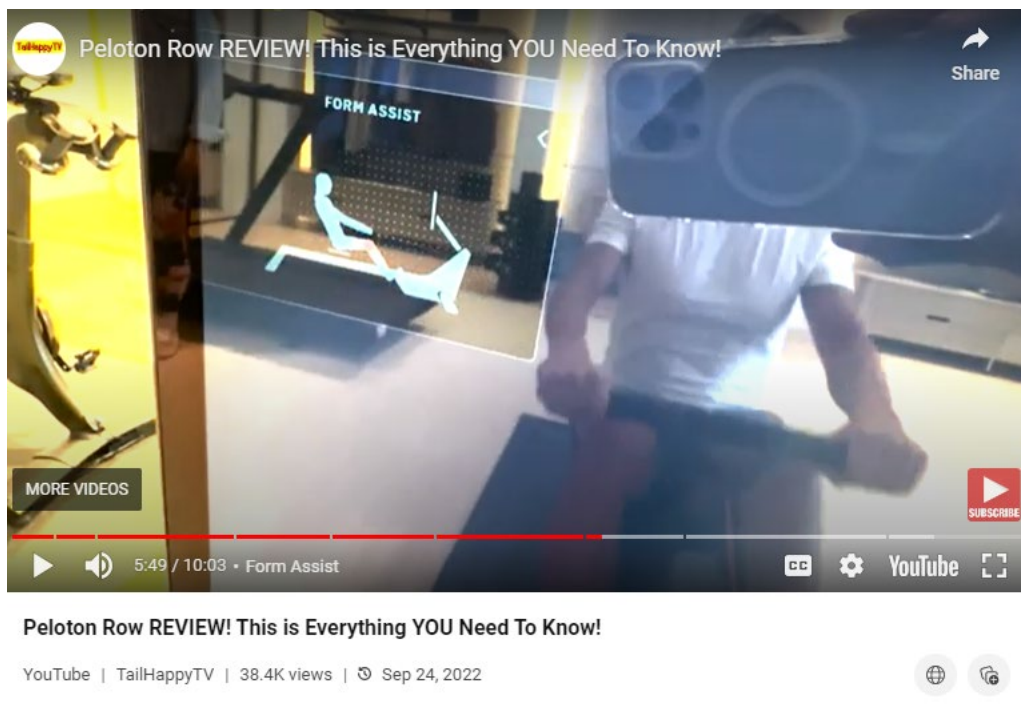
35. Defendant infringes one or more of the claims of the '520 Patent and infringes at least Claim 1 of the '520 Patent.

36. For example, Claim 1 of the '520 Patent recites:

1. A system for monitoring performance of an exercise routine, comprising:
 - a computing device;
 - a plurality of motion and position sensors configured to generate sensory information related to at least one movement of a user performing the exercise routine;
 - a database containing routine information representing at least one frame of exercise routine;
 - a training module configured to: track at least one movement of a user performing the exercise routine on an exercise device;
 - use at least one of: appearance of the exercise device, appearance of a feature of it, or machine representation model of thereof;
 - for at least one of: separate from the sensory information at least appearance of the exercise device or a feature of it, calibration and/or adjustment of the said generated sensory information, assistance in the generation of skeletal model of the user from the sensory information;
 - generate at least a skeletal model of the user from the sensory information;
 - compare the generated skeletal model generated from the sensory information to routine information stored in a database to detect at least dissimilarities between the skeletal model generated from the sensory information and the routine information,

wherein the dissimilarities indicate incorrect execution of the exercise routine, wherein the routine information represents at least an optimal execution of the exercise routine.

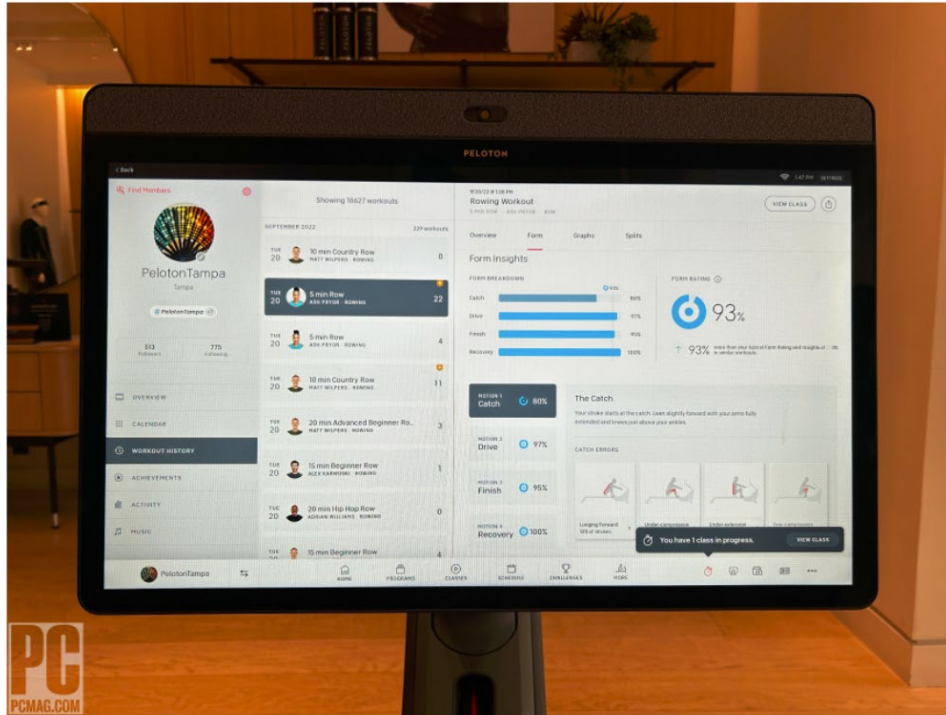
37. The Accused Products comprise a system for monitoring performance of an exercise routine, comprising: a computing device;



Source:

<https://www.bing.com/videos/riverview/relatedvideo?q=peloton+rower+youtube+video&mid=0451C99AE255DD74C6530451C99AE255DD74C653&FORM=VIRE>⁵

⁵ See also [Peloton Row+ | Pro Premium rower](#) ^[1] ^[2] ^[3] ^[4] ^[5] ^[6] ^[7] ^[8] ^[9] ^[10] ^[11] ^[12] ^[13] ^[14] ^[15] ^[16] ^[17] ^[18] ^[19] ^[20] ^[21] ^[22] ^[23] ^[24] ^[25] ^[26] ^[27] ^[28] ^[29] ^[30] ^[31] ^[32] ^[33] ^[34] ^[35] ^[36] ^[37] ^[38] ^[39] ^[40] ^[41] ^[42] ^[43] ^[44] ^[45] ^[46] ^[47] ^[48] ^[49] ^[50] ^[51] ^[52] ^[53] ^[54] ^[55] ^[56] ^[57] ^[58] ^[59] ^[60] ^[61] ^[62] ^[63] ^[64] ^[65] ^[66] ^[67] ^[68] ^[69] ^[70] ^[71] ^[72] ^[73] ^[74] ^[75] ^[76] ^[77] ^[78] ^[79] ^[80] ^[81] ^[82] ^[83] ^[84] ^[85] ^[86] ^[87] ^[88] ^[89] ^[90] ^[91] ^[92] ^[93] ^[94] ^[95] ^[96] ^[97] ^[98] ^[99] ^[100] ^[101] ^[102] ^[103] ^[104] ^[105] ^[106] ^[107] ^[108] ^[109] ^[110] ^[111] ^[112] ^[113] ^[114] ^[115] ^[116] ^[117] ^[118] ^[119] ^[120] ^[121] ^[122] ^[123] ^[124] ^[125] ^[126] ^[127] ^[128] ^[129] ^[130] ^[131] ^[132] ^[133] ^[134] ^[135] ^[136] ^[137] ^[138] ^[139] ^[140] ^[141] ^[142] ^[143] ^[144] ^[145] ^[146] ^[147] ^[148] ^[149] ^[150] ^[151] 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(Credit: Angela Moscaritolo)

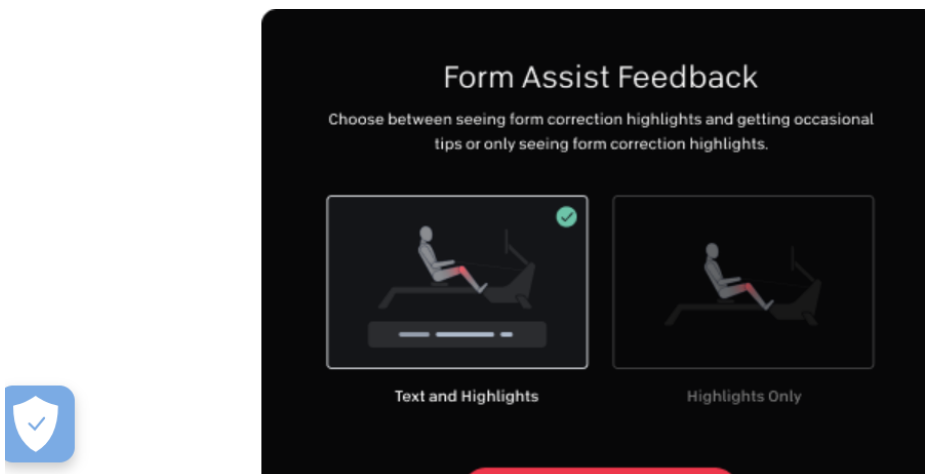
Source: <https://www.pcmag.com/news/peloton-row-hands-on-form-assist-is-a-game-changer-for-indoor-rowing>

Peloton Row Form Assist Overview

The Peloton Row uses sensors to detect the position of your body that allows the Form Assist software to analyze the data to help you row safely and powerfully by giving you feedback on your form.

How does Form Assist know my form and track my movements? Form Assist uses sensors to calibrate your stroke. It does not use camera technology.

When starting a Row class, you will have the option to choose how you receive feedback: **Highlights** only and **Text and Highlights**.



Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

38. The Accused Products include a plurality of motion and position sensors configured to generate sensory information related to at least one movement of a user performing the exercise routine;

1. Form Assist

Proper form is key in any workout, but especially so with rowing. With your most efficient form, you'll maximize your output and hit 86 percent of your muscles in each stroke. If you're new to rowing, it can take a little time to find your groove—and that's where Form Assist comes in. Using sensors in the handlebars and seat that are personally calibrated to your body, Form Assist highlights areas of your stroke that need attention to help you continuously strengthen and improve your form in class.

Source: <https://www.onepeloton.com/blog/peloton-row-features-explained/>

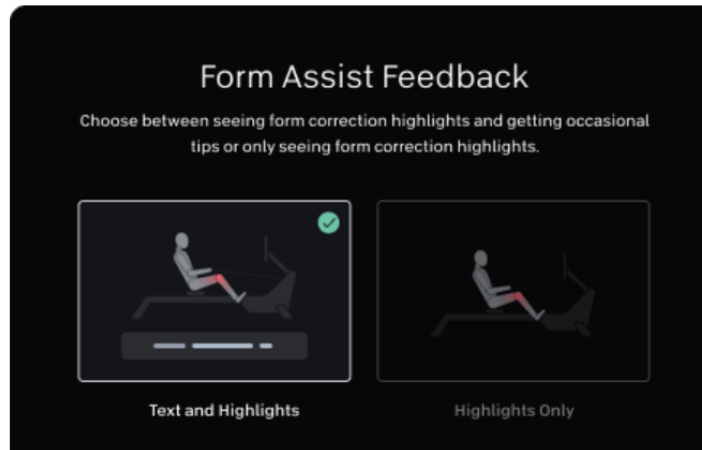
39. The Accused Products include a database containing routine information representing at least one frame of exercise routine;

Peloton Row Form Assist Overview

The Peloton Row uses sensors to detect the position of your body that allows the Form Assist software to analyze the data to help you row safely and powerfully by giving you feedback on your form.

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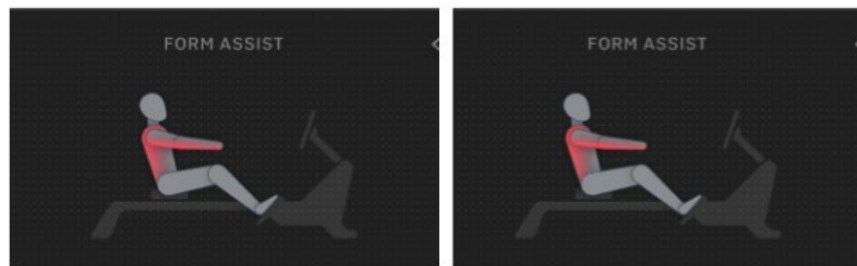


Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

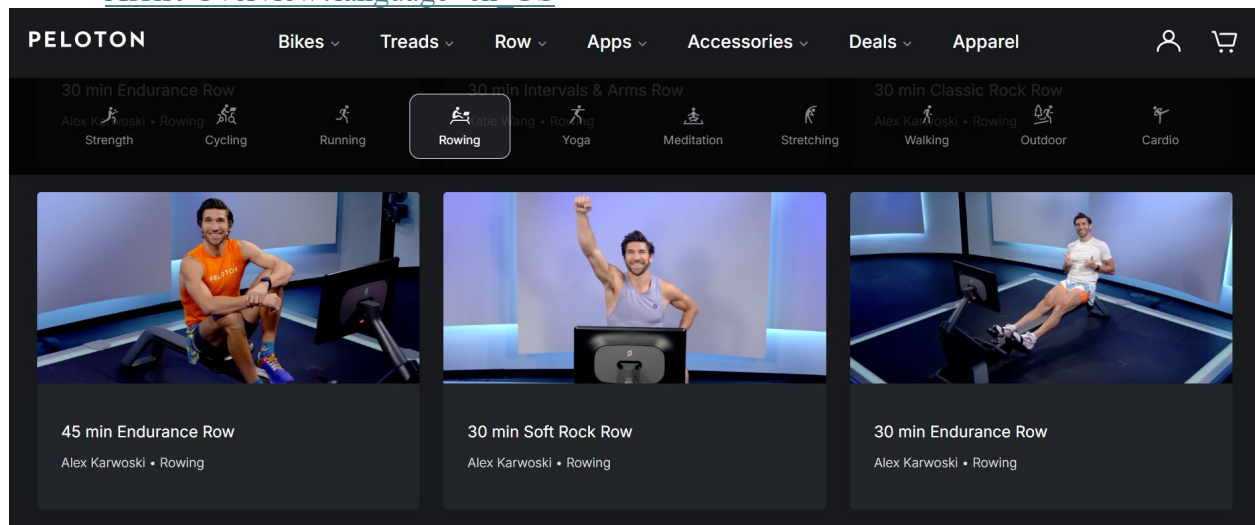
Form Assist will look like this when indicating there is no error in form:



If you choose to display Highlights, Form Assist will look like this when indicating an error in form:



Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US



Source: <https://www.onepeloton.com/classes/rowing/30-45mins>

40. The Accused Products include a training module configured to: track at least one movement of a user performing the exercise routine on an exercise device

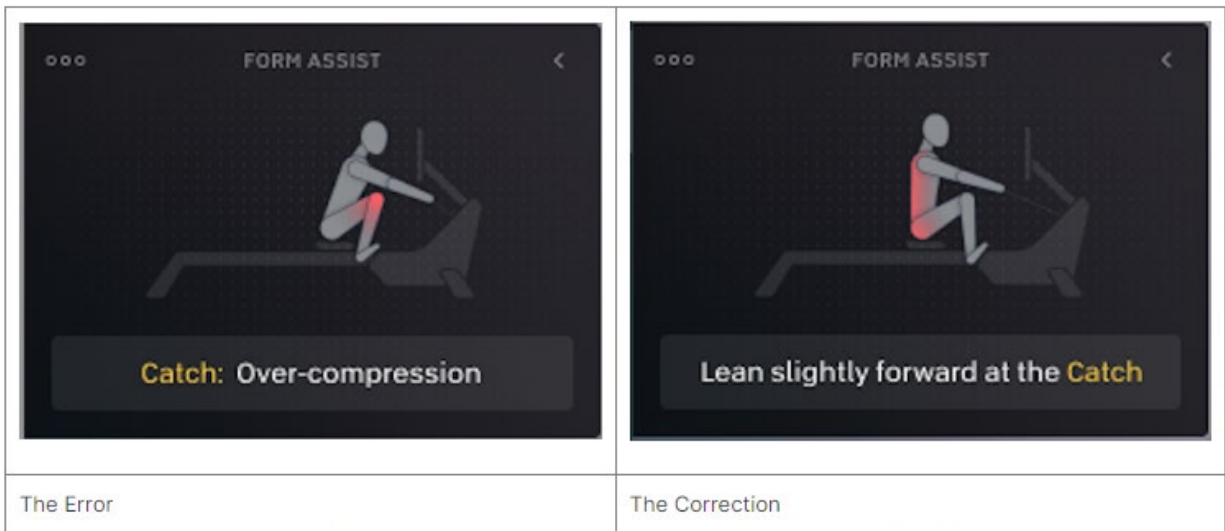
Peloton Row Form Assist Overview

The Peloton Row uses sensors to detect the position of your body that allows the Form Assist software to analyze the data to help you row safely and powerfully by giving you feedback on your form.

How does Form Assist know my form and track my movements? Form Assist uses sensors to calibrate your stroke. It does not use camera technology.

When starting a Row class, you will have the option to choose how you receive feedback: **Highlights** only and **Text and Highlights**.

If you choose to display Text and Highlights, Form Assist will look like this when indicating an error in form and will offer tips for correction:



For more information about how Form Assist detects errors in rowing form, check out [this article](https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US).

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

Additionally, the Accused Products use a training module to perform device setup:

Calibrating Form Assist

Everyone's body is different, so Form Assist is designed to give you feedback that's unique to you. To do that, it needs to get to know you, so the Form Assist feature will ask you to calibrate it the first time you log in to your Row.

The software will give you a couple of short, simple movement instructions to take some measurements, and then save the calibration to your profile. This will activate the Form Assist features on your Peloton Row.

You might find that your body changes after rowing for a while. You might become stronger and more flexible. If you do, the Form Assist will need to be recalibrated to continue giving you the best feedback. If the Form Assist figure seems to be out of sync with your movements, it may need to be recalibrated. You can also use this process if it seems like your Form Assist is incorrectly calibrated. You can do this by tapping into your profile and selecting "Calibrate."

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

41. The Accused Products use at least one of: appearance of the exercise device (rower), appearance of a feature of it (seat), or machine representation model of thereof.

If you choose to display Highlights, Form Assist will look like this when indicating an error in form:



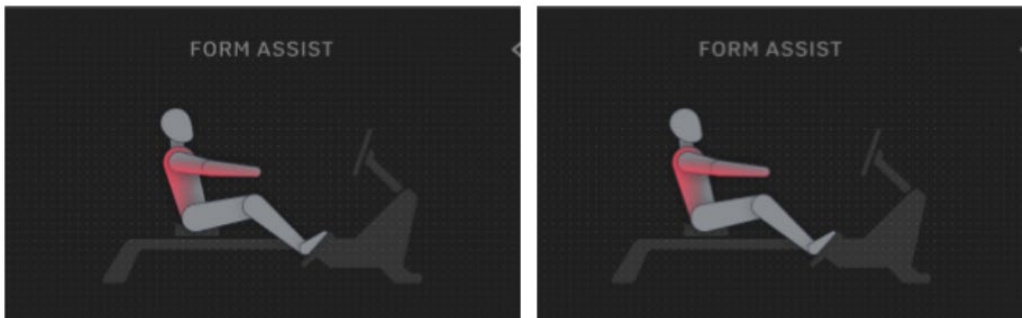
If you choose to display Text and Highlights, Form Assist will look like this when indicating an error in form and will offer tips for correction:

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

42. On information and belief, the Accused Products meet the limitation: for at least one of: separate from the sensory information at least appearance of the exercise device or feature of it, calibration and/or adjustment of the said generated sensory information, assistance in the generation of skeletal model of the user from the sensory information. Specifically, the training

module of the Accused Products will use the device appearance, feature of the device's appearance, or machine represented model of the device in order to do at least one of three things: (1) separate out the sensory information related to a movement of the user from the device appearance/feature appearance, (2) calibrate/adjust the sensory information related to a movement of the user; or (3) assist in the generation of skeletal model of the user.

If you choose to display Highlights, Form Assist will look like this when indicating an error in form:



If you choose to display Text and Highlights, Form Assist will look like this when indicating an error in form and will offer tips for correction:

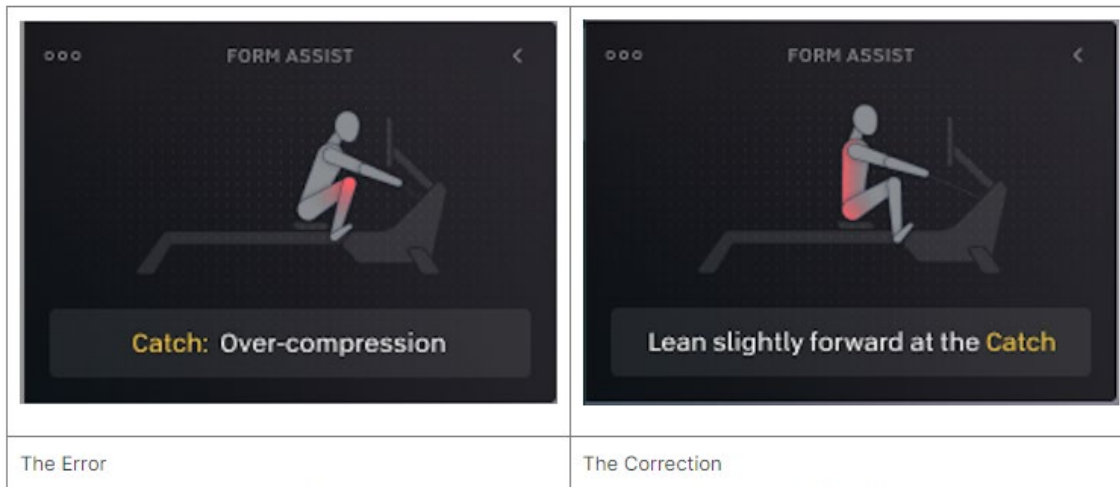
Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

43. The Accused Products generate at least a skeletal model of the user from the sensory information.

Proper form is key in any workout, but especially so with rowing. With your most efficient form, you'll maximize your output and hit 86 percent of your muscles in each stroke. If you're new to rowing, it can take a little time to find your groove—and that's where Form Assist comes in. Using sensors in the handlebars and seat that are personally calibrated to your body, Form Assist highlights areas of your stroke that need attention to help you continuously strengthen and improve your form in class.

Source: <https://www.onepeloton.com/blog/peloton-row-features-explained>

If you choose to display Text and Highlights, Form Assist will look like this when indicating an error in form and will offer tips for correction:



For more information about how Form Assist detects errors in rowing form, check out [this article](#).

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

Form Assist may highlight:

Bending Knees Early - you may see this if you're bending your knees before extending your arms or leaning forward.

What this looks like on Form Assist:



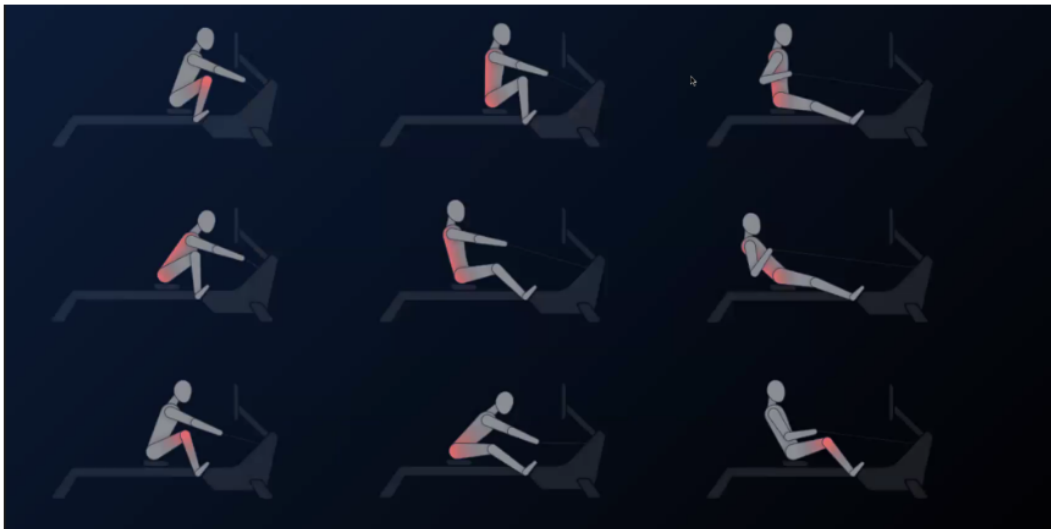
How to fix this: During your recovery, avoid bending your knees before extending your arms and leaning forward. Once your handle has cleared your knees, bend your legs and return to the catch.

Source: <https://preview.shorthand.com/9SJFYIwNWoYEOngb>

44. The Accused Products compare the generated skeletal model generated from the sensory information to routine information stored in a database to detect at least dissimilarities between the skeletal model generated from the sensory information and the routine information, wherein the dissimilarities indicate incorrect execution of the exercise routine, wherein the routine information represents at least an optimal execution of the exercise routine.

Monitoring Your Form

Following the initial calibration, a Form Assist visualization on the Peloton Row class screen will highlight areas for improvement in real time. If you do something wrong or out of order—like bend your knees too early, lean back too far, or slump forward—the corresponding body part will light up in red, so you can adjust your technique accordingly. Here's the Form Assist warnings you might see on the screen:



Peloton Row form warnings (Credit: Peloton)

Source: <https://www.pcmag.com/news/peloton-row-hands-on-form-assist-is-a-game-changer-for-indoor-rowing>

Features That Help You Level Up

Peloton Row will be your partner in progress, especially if you're new to rowing. With features like Form Assist, you'll get real-time correction on your stroke to help you spot points of improvement and strengthen your stroke during a class or Just Row session. Post-class, you'll get a Form Rating and Insights dashboard that will provide a breakdown of your performance and progress and give you tips for the next time you row.

Source: <https://www.onepeloton.com/blog/meet-peloton-row>

Here's another thing that's cool: Peloton also gives you a score out of 100% for each phase of the rowing stroke, so you can see which part(s) you need to work on. For the five-minute demo class, I scored lowest (80%) for the catch. For this phase of the stroke, it tracks the following potential errors: lunging forward, under-compression, under-extension, and over-compression, offering an explanation of each problem and tips on how to correct it. During my demo row, the machine said I was lunging forward on 12% of strokes, under-compressed on 9% of strokes, under-extended on 4% of strokes, and over-compressed on 0% of strokes. You can tap into the other phases of the stroke for a similarly detailed breakdown of errors and tips to improve. This is all very helpful information that some enthusiasts are going to love to nerd out on.

Source: [Peloton Row Hands On: Form Assist Is a Game Changer for Indoor Rowing | PCMag](#)

Form Assist may highlight:

Over Compression - This is when your knees are passing beyond 90-degrees above your ankles

What this looks like on Form Assist:



How to fix it: Try to keep your shins vertical, with your knees just above or behind the ankles. Going past the ankles can create undue stress on your knees.

Source: <https://preview.shorthand.com/9SJFYIwNW0YEOngb>

45. The Accused Products satisfy all claim limitations of one or more claims of the '520 Patent. Defendant has infringed and continues to directly infringe one or more claims of the '520 Patent by making, using, selling, and/or offering for sale in the United States and/or importing into the United States the Accused Products. To the extent that any element is not literally present, each such element is present under the doctrine of equivalents because it performs substantially the same function in substantially the same way to achieve substantially the same result, and any differences between the Accused Products and the claim element are insubstantial.

46. Defendant also knowingly and intentionally induces infringement of at least Claim 1 of the '520 Patent in violation of 35 U.S.C. § 271(b). Through at least the filing and service of this Complaint, Defendant has had knowledge of the '520 Patent and the infringing nature of the Accused Products. Despite this knowledge of the '520 Patent and its infringement, Defendant continues to actively encourage and instruct its customers and end users (for example, through user manuals and online Q&A, product information and instruction materials on its website and various service and customer support) to use the Accused Products in ways that directly infringe the '520 Patent. Defendant does so knowing and intending that its customers and end users will commit these infringing acts. Defendant also continues to make, use, offer for sale, sell, and/or import the Accused Products, despite its knowledge of the '520 Patent, thereby specifically intending for and inducing its customers to infringe the '520 Patent through the customers' normal and customary use of the Accused Products.

47. To the extent discovery confirms that particular components or functionality of the Accused Products constitute a material part of the inventions claimed in the '520 Patent, are especially made or adapted for infringing use, and are not staple articles or commodities of commerce suitable for substantial non-infringing use, Defendant has contributorily infringed and continues to contributorily infringe the '520 Patent under 35 U.S.C. § 271(c).

48. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Defendant has injured Plaintiff and is liable for infringement of the '520 Patent pursuant to 35 U.S.C. § 271.

49. As a result of Defendant's infringement of the '520 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Defendant's infringement, but in no

event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

50. Defendant also has knowledge of the '520 Patent at least due to the filing and service of this Complaint, and based on that knowledge, Defendant willfully infringes the '520 Patent.

COUNT II

DEFENDANT'S INFRINGEMENT OF U.S. PATENT NO. 11,745,055

51. Flow Motion realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

52. The claims of the '055 Patent relate to systems for monitoring performance of an exercise routine comprising a computing device, a plurality of motion and position sensors configured to generate sensory information related to movement of a user performing the exercise routine, a database containing routine information representing at least one frame of the exercise routine, and a training module configured to track movement of the user on an exercise device, use the appearance of the exercise device, a feature of the exercise device, or a machine representation model of the device, and use that information to separate the exercise device from the sensory information, calibrate or adjust the sensory information, or assist in generating a machine representation model of the user from the sensory information.

53. The claims of the '055 Patent present specific, non-abstract improvements to motion tracking and exercise monitoring technology. Independent Claim 1 recites a concrete system that uses a computing device, a plurality of motion and position sensors generating sensory information related to movements of a user performing an exercise routine, and a database storing routine information representing frames of the exercise routine. The claim further recites a training

module configured to track the user's movement on an exercise device and to use the appearance of the exercise device, a feature of the device, or a machine representation model of the device to process the sensory information, including separating the appearance of the exercise device from the sensory information, calibrating or adjusting the sensory information, or assisting in generating a machine representation model of the user. These claimed approaches therefore present specific, non-abstract improvements to the technological operation of sensor-based motion analysis and exercise monitoring systems.

54. The claims of the '055 Patent are valid and enforceable, and each enjoys a statutory presumption of validity under 35 U.S.C. § 282.

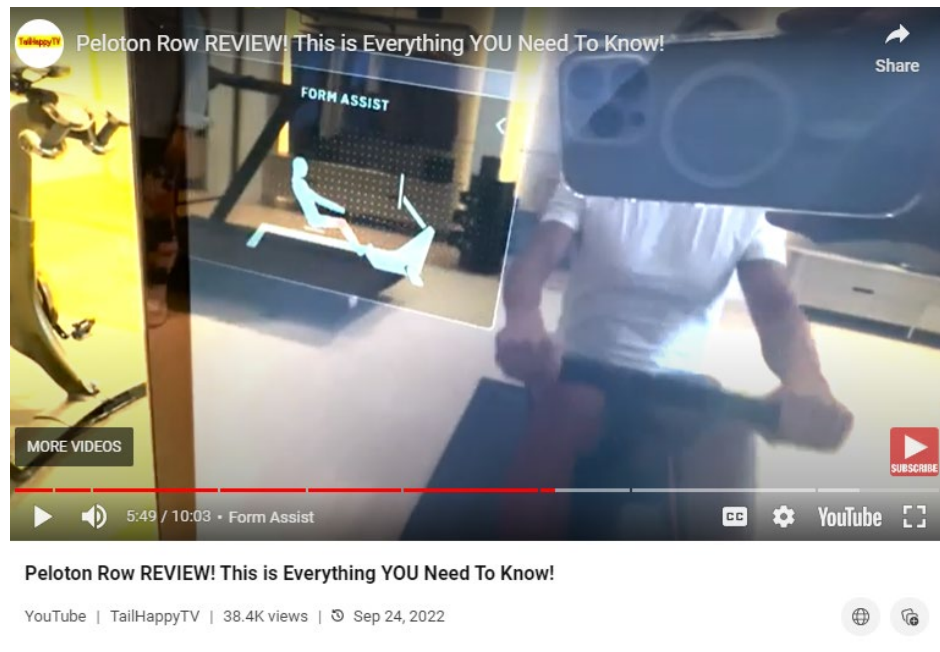
55. Defendant's infringing activities violate 35 U.S.C. § 271.

56. Defendant infringes one or more of the claims of the '055 Patent and Defendant infringes at least Claim 1 of the '055 Patent.

57. For example, Claim 1 of the '055 Patent recites:

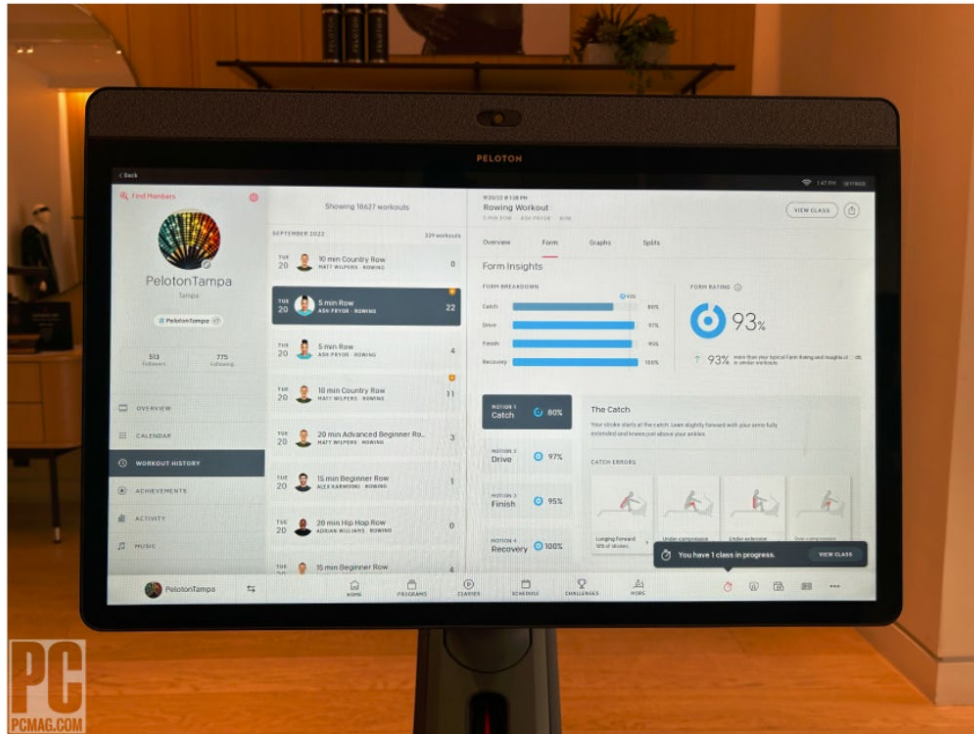
1. A system for monitoring performance of an exercise routine, comprising:
 - a computing device;
 - a plurality of motion and position sensors configured to generate sensory information related to at least one movement of a user performing the exercise routine;
 - a database containing routine information representing at least one frame of exercise routine;
 - a training module configured to: track at least one movement of a user performing the exercise routine on an exercise device;
 - use at least one of: appearance of the exercise device, appearance of a feature of the said exercise device, or machine representation model of thereof;
 - for at least one of: separate from the sensory information at least appearance of the exercise device or a feature of it, calibration and/or adjustment of the said generated sensory information, assistance in the generation of machine representation of the user from the sensory information;
 - generate at least a machine representation model of the user from the sensory information.

58. The Accused Products comprise a system for monitoring performance of an exercise routine, comprising: a computing device;



Source:

<https://www.bing.com/videos/riverview/relatedvideo?q=peloton+rower+youtube+video&mid=0451C99AE255DD74C6530451C99AE255DD74C653&FORM=VIRE>



(Credit: Angela Moscaritolo)

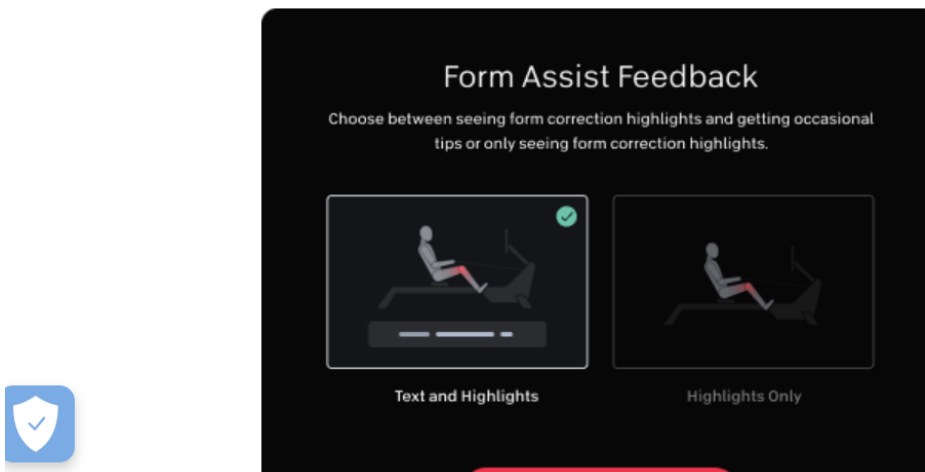
Source: <https://www.pcmag.com/news/peloton-row-hands-on-form-assist-is-a-game-changer-for-indoor-rowing>

Peloton Row Form Assist Overview

The Peloton Row uses sensors to detect the position of your body that allows the Form Assist software to analyze the data to help you row safely and powerfully by giving you feedback on your form.

How does Form Assist know my form and track my movements? Form Assist uses sensors to calibrate your stroke. It does not use camera technology.

When starting a Row class, you will have the option to choose how you receive feedback: **Highlights** only and **Text and Highlights**.



Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

59. The Accused Products include a plurality of motion and position sensors configured to generate sensory information related to at least one movement of a user performing the exercise routine;

1. Form Assist

Proper form is key in any workout, but especially so with rowing. With your most efficient form, you'll maximize your output and hit 86 percent of your muscles in each stroke. If you're new to rowing, it can take a little time to find your groove—and that's where Form Assist comes in. Using sensors in the handlebars and seat that are personally calibrated to your body, Form Assist highlights areas of your stroke that need attention to help you continuously strengthen and improve your form in class.

Source: <https://www.onepeloton.com/blog/peloton-row-features-explained/>

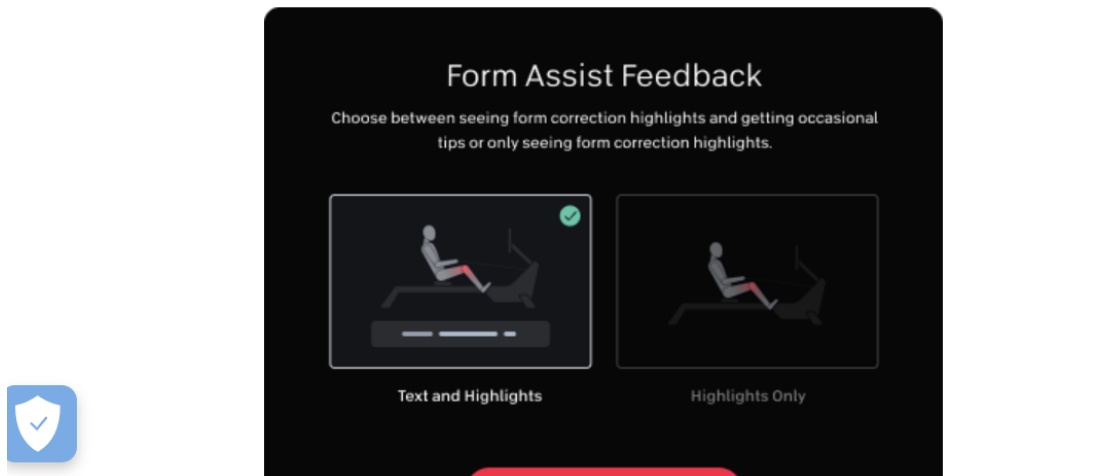
60. The Accused Products include a database containing routine information representing at least one frame of exercise routine;

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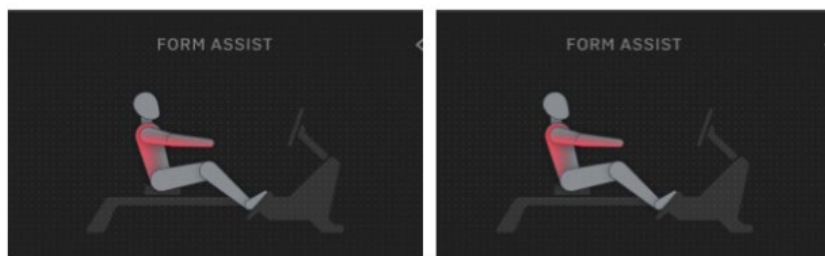
When starting a Row class, you will have the option to choose how you receive feedback: **Highlights** only and **Text and Highlights**.



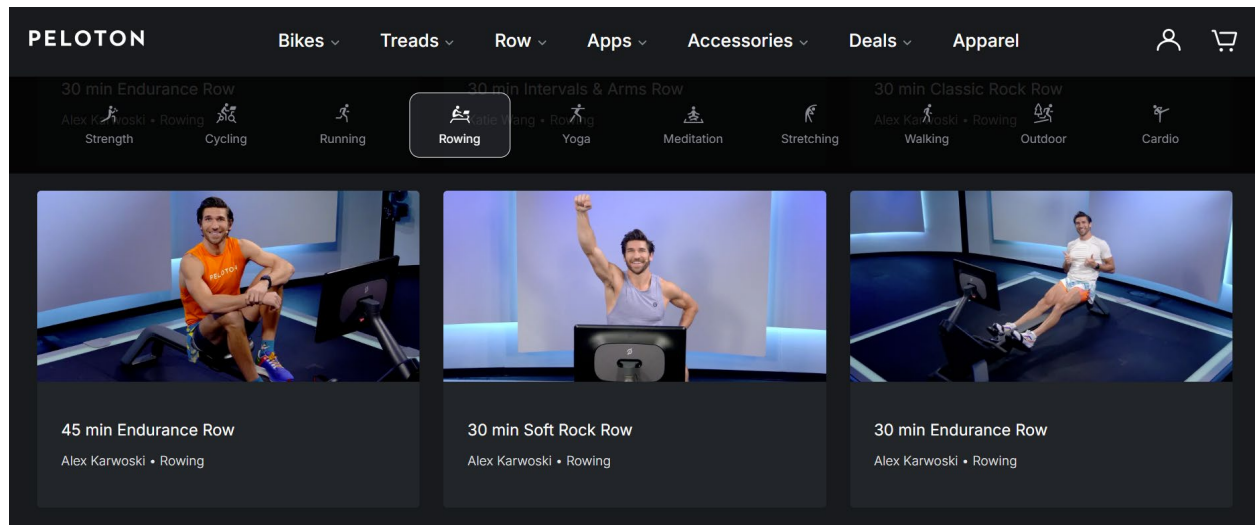
Form Assist will look like this when indicating there is no error in form:



If you choose to display Highlights, Form Assist will look like this when indicating an error in form:



Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US



Source: <https://www.onepeloton.com/classes/rowing/30-45mins>

61. The Accused Products include a training module configured to: track at least one movement of a user performing the exercise routine on an exercise device

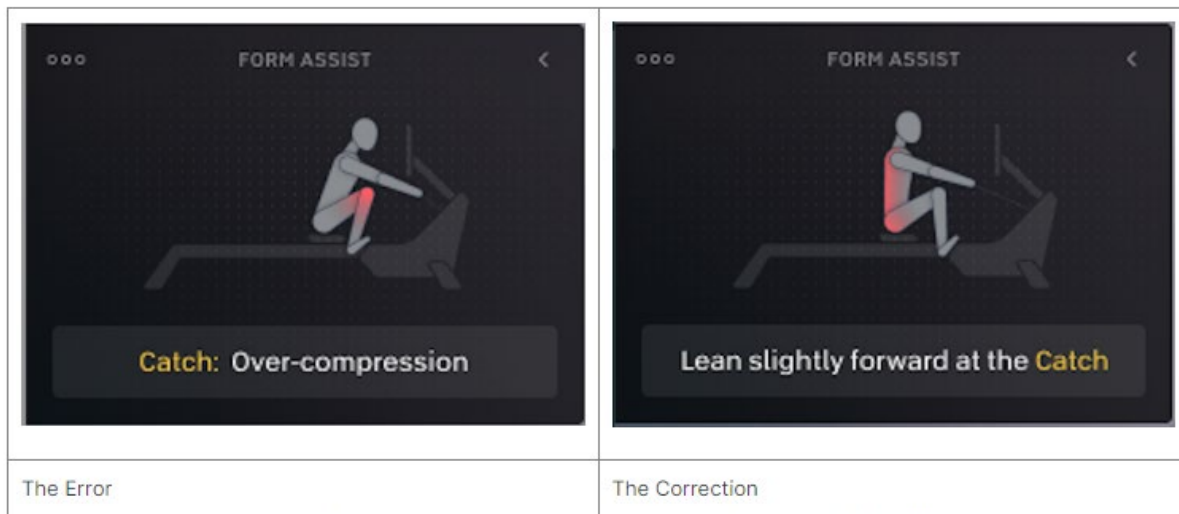
Peloton Row Form Assist Overview

The Peloton Row uses sensors to detect the position of your body that allows the Form Assist software to analyze the data to help you row safely and powerfully by giving you feedback on your form.

How does Form Assist know my form and track my movements? Form Assist uses sensors to calibrate your stroke. It does not use camera technology.

When starting a Row class, you will have the option to choose how you receive feedback: **Highlights** only and **Text and Highlights**.

If you choose to display Text and Highlights, Form Assist will look like this when indicating an error in form and will offer tips for correction:



For more information about how Form Assist detects errors in rowing form, check out [this article](https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US).

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

Additionally, the Accused Products use a training module to perform device setup:

Calibrating Form Assist

Everyone's body is different, so Form Assist is designed to give you feedback that's unique to you. To do that, it needs to get to know you, so the Form Assist feature will ask you to calibrate it the first time you log in to your Row.

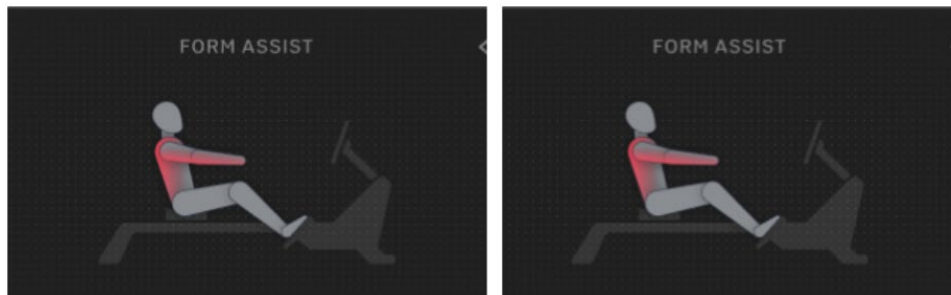
The software will give you a couple of short, simple movement instructions to take some measurements, and then save the calibration to your profile. This will activate the Form Assist features on your Peloton Row.

You might find that your body changes after rowing for a while. You might become stronger and more flexible. If you do, the Form Assist will need to be recalibrated to continue giving you the best feedback. If the Form Assist figure seems to be out of sync with your movements, it may need to be recalibrated. You can also use this process if it seems like your Form Assist is incorrectly calibrated. You can do this by tapping into your profile and selecting "Calibrate."

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

62. The Accused Products use at least one of: appearance of the exercise device (rower), appearance of a feature of the said exercise device (seat), or machine representation model of thereof.

If you choose to display Highlights, Form Assist will look like this when indicating an error in form:

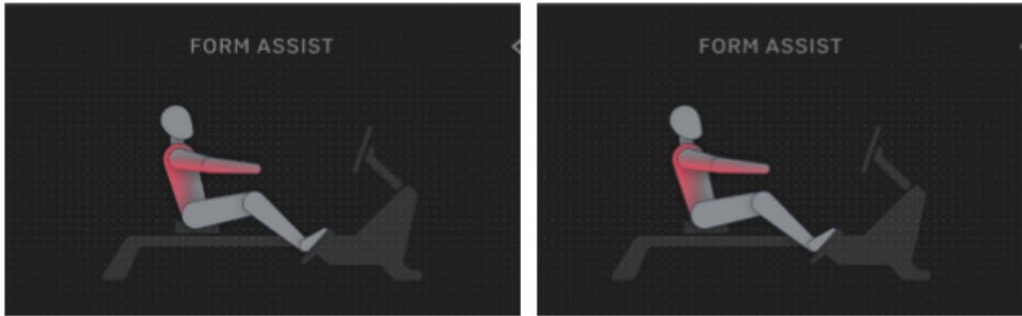


If you choose to display Text and Highlights, Form Assist will look like this when indicating an error in form and will offer tips for correction:

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

63. On information and belief, the Accused Products meet the limitation: for at least one of: separate from the sensory information at least appearance of the exercise device or feature of it, calibration and/or adjustment of the said generated sensory information, assistance in the generation of machine representation of the user from the sensory information. Specifically, the training module of the Accused Products will use the device appearance, feature of the device's appearance, or machine represented model of the device in order to do at least one of three things: (1) separate out the sensory information related to a movement of the user from the device appearance/feature appearance, (2) calibrate/adjust the sensory information related to a movement of the user; or (3) assist in the generation of a machine representation of the user.

If you choose to display Highlights, Form Assist will look like this when indicating an error in form:



If you choose to display Text and Highlights, Form Assist will look like this when indicating an error in form and will offer tips for correction:

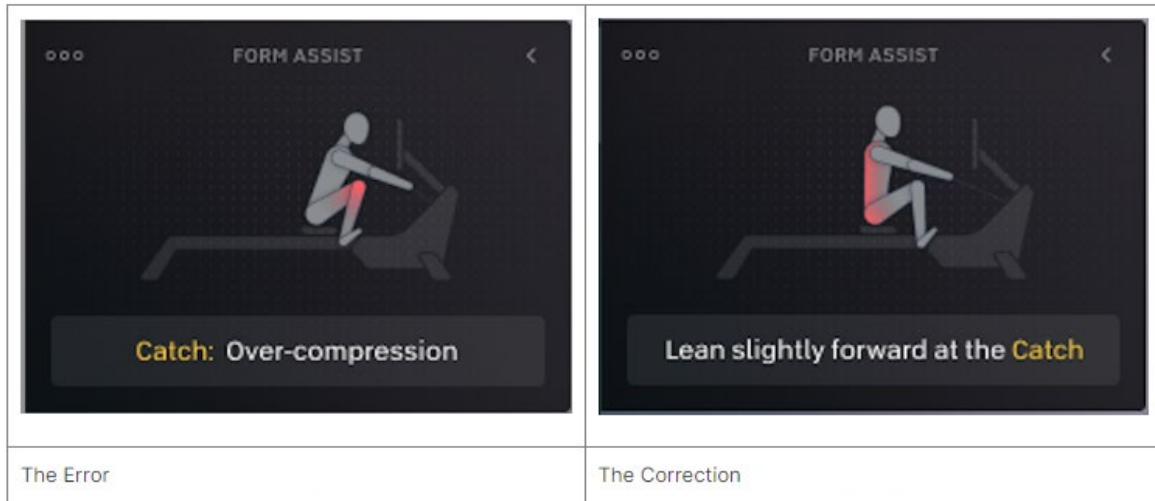
Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

64. The Accused Products generate at least a machine representation model of the user from the sensory information.

Proper form is key in any workout, but especially so with rowing. With your most efficient form, you'll maximize your output and hit 86 percent of your muscles in each stroke. If you're new to rowing, it can take a little time to find your groove—and that's where Form Assist comes in. Using sensors in the handlebars and seat that are personally calibrated to your body, Form Assist highlights areas of your stroke that need attention to help you continuously strengthen and improve your form in class.

Source: <https://www.onepeloton.com/blog/peloton-row-features-explained>

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For more information about how Form Assist detects errors in rowing form, check out [this article](#).

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

Form Assist may highlight:

Bending Knees Early - you may see this if you're bending your knees before extending your arms or leaning forward.

What this looks like on Form Assist:



How to fix this: During your recovery, avoid bending your knees before extending your arms and leaning forward. Once your handle has cleared your knees, bend your legs and return to the catch.

Source: <https://preview.shorthand.com/9SJFYIwNW0YEOngb>

65. The Accused Products satisfy all claim limitations of one or more claims of the '055 Patent. Defendant has infringed and continues to directly infringe one or more claims of the '055 Patent by making, using, selling, and/or offering for sale in the United States and/or importing into the United States the Accused Products. To the extent that any element is not literally present, each such element is present under the doctrine of equivalents because it performs substantially the same function in substantially the same way to achieve substantially the same result, and any differences between the Accused Products and the claim element are insubstantial.

66. Defendant also knowingly and intentionally induces infringement of at least Claim 1 of the '055 Patent in violation of 35 U.S.C. § 271(b). Through at least the filing and service of this Complaint, Defendant has had knowledge of the '055 Patent and the infringing nature of the Accused Products. Despite this knowledge of the '055 Patent and its infringement, Defendant continues to actively encourage and instruct its customers and end users (for example, through user manuals and online Q&A, product information and instruction materials on its website and various service and customer support) to use the Accused Products in ways that directly infringe the '055 Patent. Defendant does so knowing and intending that its customers and end users will commit these infringing acts. Defendant also continues to make, use, offer for sale, sell, and/or import the Accused Products, despite its knowledge of the '055 Patent, thereby specifically intending for and inducing its customers to infringe the '055 Patent through the customers' normal and customary use of the Accused Products.

67. To the extent discovery confirms that particular components or functionality of the Accused Products constitute a material part of the inventions claimed in the '055 Patent, are especially made or adapted for infringing use, and are not staple articles or commodities of

commerce suitable for substantial non-infringing use, Defendant has contributorily infringed and continues to contributorily infringe the '055 Patent under 35 U.S.C. § 271(c).

68. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Defendant has injured Plaintiff and is liable for infringement of the '055 Patent pursuant to 35 U.S.C. § 271.

69. As a result of Defendant's infringement of the '055 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

70. Defendant also has knowledge of the '055 Patent at least due to the filing and service of this Complaint, and based on that knowledge, Defendant willfully infringes the '055 Patent.

COUNT III

DEFENDANT'S INFRINGEMENT OF U.S. PATENT NO. 12,157,035

71. Flow Motion realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

72. The claims of the '035 Patent relate to systems for monitoring performance of an exercise routine comprising a computing device, at least one motion sensor and/or position sensor configured to generate sensory information related to movement of a user performing the exercise routine, a database containing routine information representing at least one frame of the exercise routine, and a training module configured to track movement of the user on an exercise device, use the appearance of the exercise device, a feature of the exercise device, or a machine representation model of the device, and use that information to separate the exercise device from the sensory

information, calibrate or adjust the sensory information, or assist in generating a machine representation of the user from the sensory information.

73. The claims of the '035 Patent present specific, non-abstract improvements to motion tracking and exercise monitoring technology. Independent Claim 1 recites a concrete system that uses a computing device, at least one motion sensor or position sensor configured to generate sensory information related to movements of a user performing an exercise routine, and a database storing routine information representing frames of the exercise routine. The claim further recites a training module configured to track the user's movement on an exercise device and to use the appearance of the exercise device, a feature of the device, or a machine representation model of the device to process the sensory information, including separating the appearance of the exercise device from the sensory information, calibrating or adjusting the sensory information, or assisting in generating a machine representation of the user. These claimed approaches therefore present specific, non-abstract improvements to the technological operation of sensor-based motion analysis and exercise monitoring systems.

74. The claims of the '035 Patent are valid and enforceable, and each enjoys a statutory presumption of validity under 35 U.S.C. § 282.

75. Defendant's infringing activities violate 35 U.S.C. § 271.

76. Defendant infringes one or more of the claims of the '035 Patent and Defendant infringes at least Claim 1 of the '035 Patent.

77. For example, Claim 1 of the '035 Patent recites:

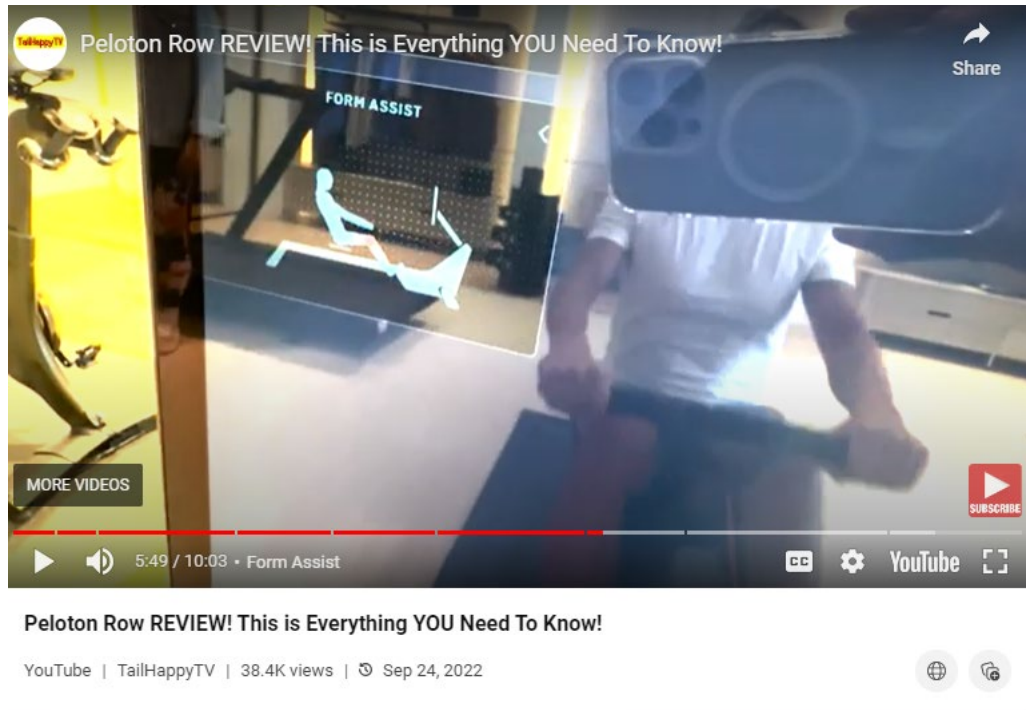
1. A system for monitoring performance of an exercise routine, comprising:
a computing device;
at least one of motion sensor and/or at least one of position sensor, the position sensor/s and/or motion sensor/s configured to generate sensory information related to at least one movement of a user performing the exercise routine;

a database containing routine information representing at least one frame of exercise routine;

a training module configured to: track at least one movement of the user performing the exercise routine on an exercise device;

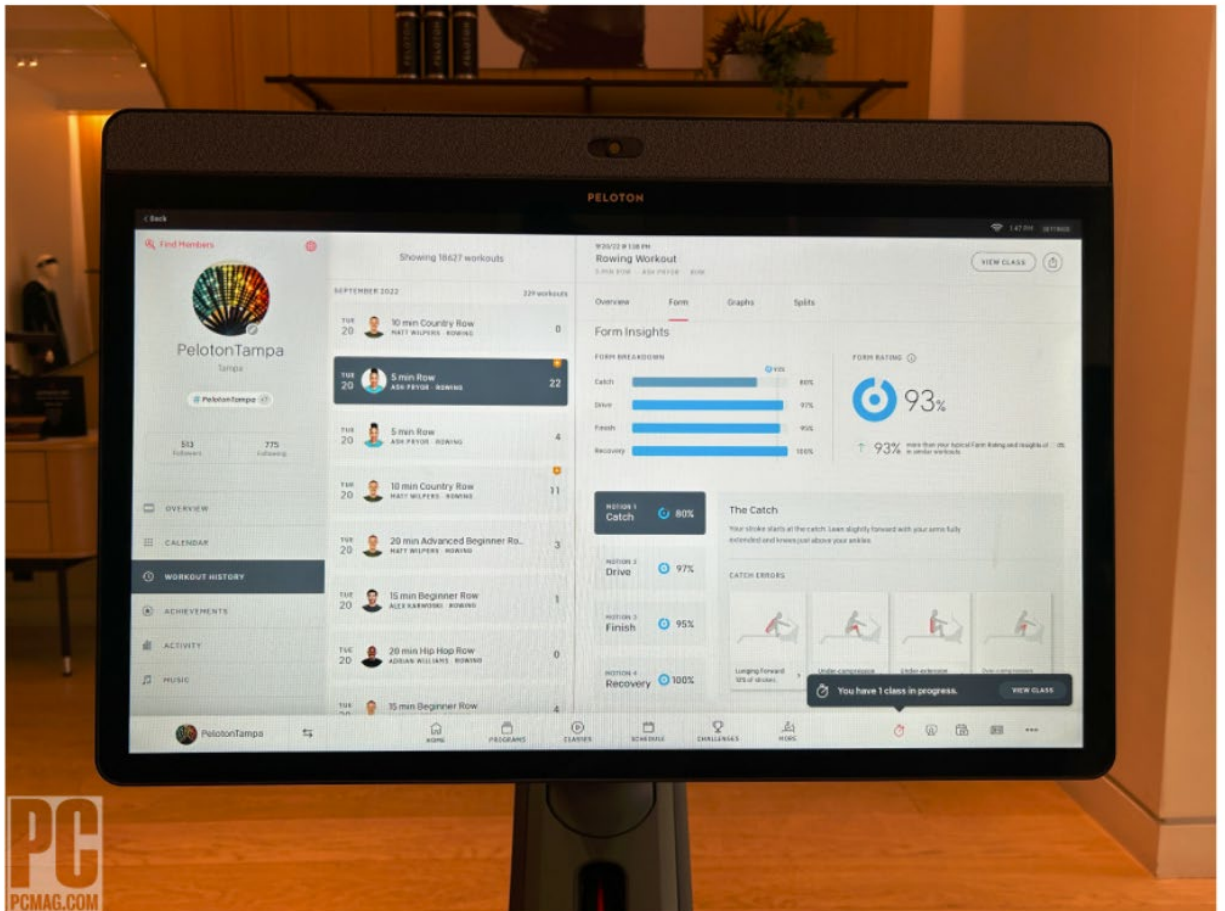
use at least one of: appearance of the exercise device, appearance of a feature of the exercise device, or a machine representation model of thereof; for at least one of: separate from the sensory information at least appearance of the exercise device or the feature of it, calibration and/or adjustment of the generated sensory information, assistance in the generation of the machine representation of the user from the sensory information.

78. The Accused Products comprise a system for monitoring performance of an exercise routine, comprising: a computing device;



Source:

<https://www.bing.com/videos/riverview/relatedvideo?q=peloton+rower+youtube+video&mid=0451C99AE255DD74C6530451C99AE255DD74C653&FORM=VIRE>



(Credit: Angela Moscaritolo)

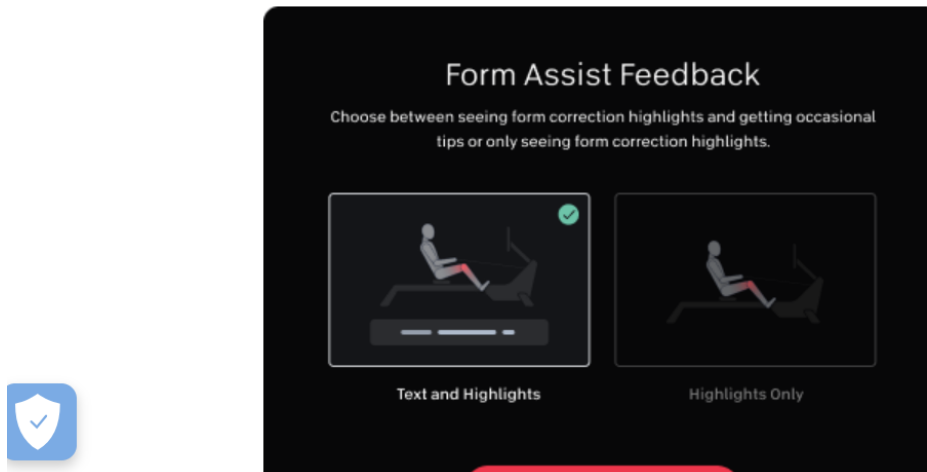
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When starting a Row class, you will have the option to choose how you receive feedback: **Highlights** only and **Text and Highlights**.



Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

79. The Accused Products include at least one of motion sensor and/or at least one of position sensor, the position sensor/s and/or motion sensor/s configured to generate sensory information related to at least one movement of a user performing the exercise routine;

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Proper form is key in any workout, but especially so with rowing. With your most efficient form, you'll maximize your output and hit 86 percent of your muscles in each stroke. If you're new to rowing, it can take a little time to find your groove—and that's where Form Assist comes in. Using sensors in the handlebars and seat that are personally calibrated to your body, Form Assist highlights areas of your stroke that need attention to help you continuously strengthen and improve your form in class.

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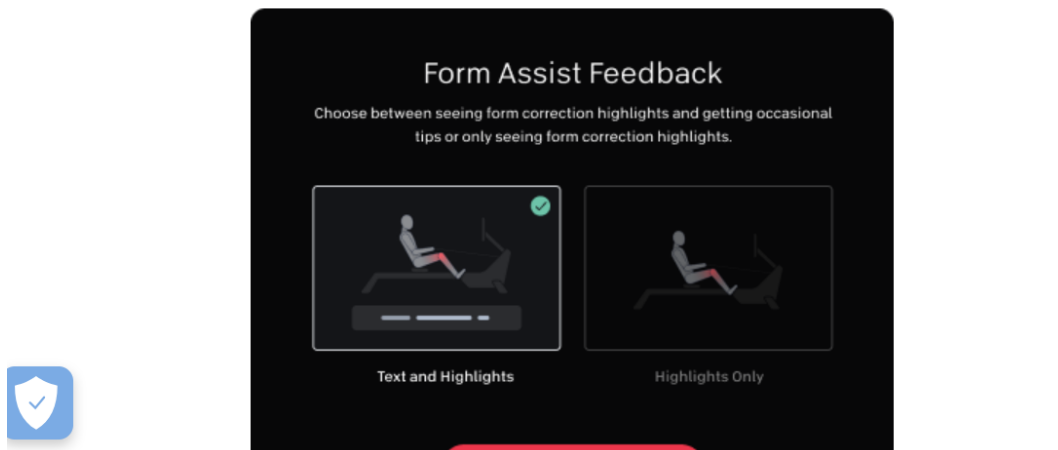
80. The Accused Products include a database containing routine information representing at least one frame of exercise routine;

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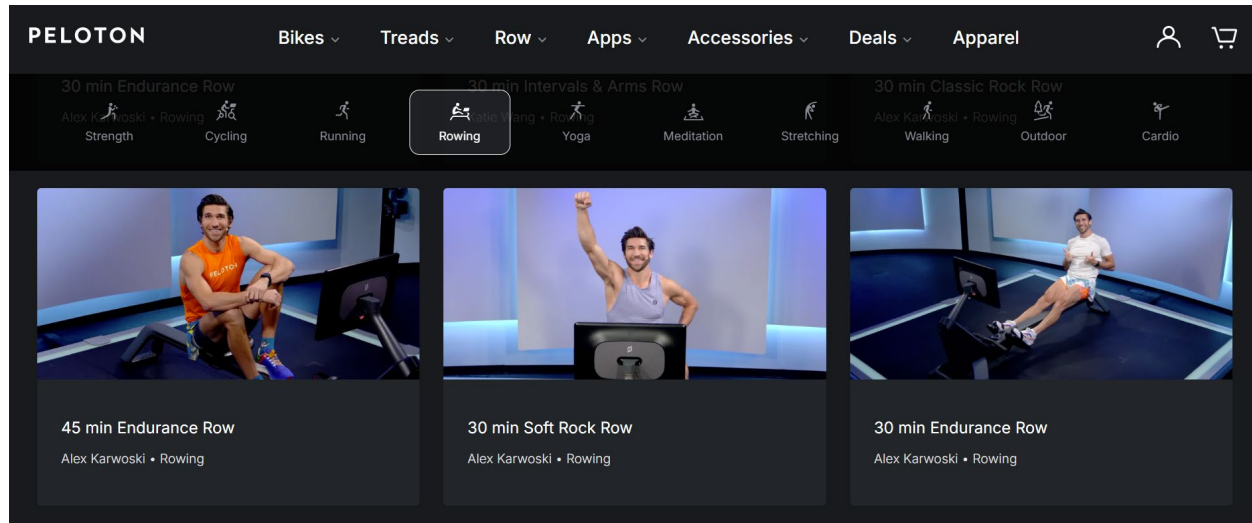
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Source: <https://www.onepeloton.com/classes/rowing/30-45mins>

81. The Accused Products include a training module configured to: track at least one movement of the user performing the exercise routine on an exercise device:

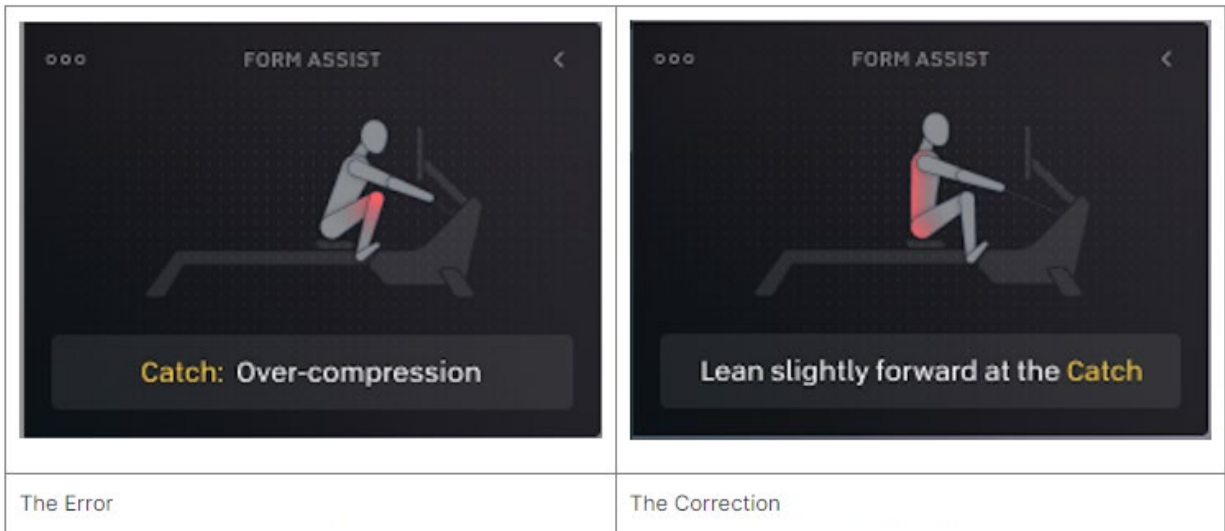
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Additionally, the Accused Products use a training module to perform device setup:

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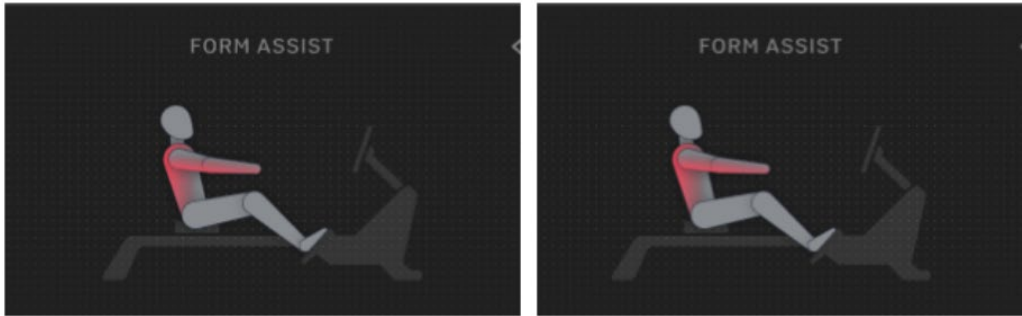
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Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

82. The Accused Products use at least one of: appearance of the exercise device (rower), appearance of a feature of the said exercise device (seat), or a machine representation model of thereof.

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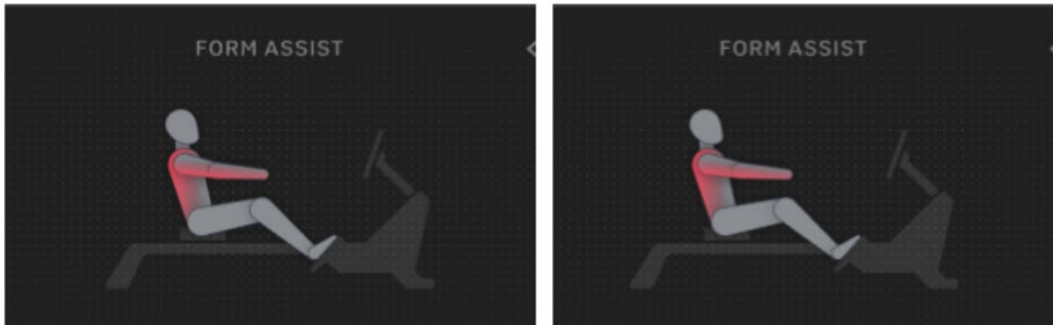


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83. On information and belief, the Accused Products meet the limitation: for at least one of: separate from the sensory information at least appearance of the exercise device or the feature of it, calibration and/or adjustment of the said generated sensory information, assistance in the generation of machine representation of the user from the sensory information. Specifically, the training module of the Accused Products will use the device appearance, feature of the device's appearance, or machine represented model of the device in order to do at least one of three things: (1) separate out the sensory information related to a movement of the user from the device appearance/feature appearance, (2) calibrate/adjust the sensory information related to a movement of the user; or (3) assist in the generation of a machine representation of the user.

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If you choose to display Text and Highlights, Form Assist will look like this when indicating an error in form and will offer tips for correction:

Source: https://support.onepeloton.com/s/article/9389589901716-Peloton-Row-Form-Assist-Overview?language=en_US

Form Assist may highlight:

Over Compression - This is when your knees are passing beyond 90-degrees above your ankles

What this looks like on Form Assist:



How to fix it: Try to keep your shins vertical, with your knees just above or behind the ankles. Going past the ankles can create undue stress on your knees.

Source: <https://preview.shorthand.com/9SJFYIwNWoyEoNgb>

84. The Accused Products satisfy all claim limitations of one or more claims of the '035 Patent. Defendant has infringed and continues to directly infringe one or more claims of the '035 Patent by making, using, selling, and/or offering for sale in the United States and/or importing into the United States the Accused Products. To the extent that any element is not literally present, each such element is present under the doctrine of equivalents because it performs substantially the same function in substantially the same way to achieve substantially the same result, and any differences between the Accused Products and the claim element are insubstantial.

85. Defendant also knowingly and intentionally induces infringement of at least Claim 1 of the '035 Patent in violation of 35 U.S.C. § 271(b). Through at least the filing and service of this Complaint, Defendant has had knowledge of the '035 Patent and the infringing nature of the Accused Products. Despite this knowledge of the '035 Patent and its infringement, Defendant continues to actively encourage and instruct its customers and end users (for example, through user manuals and online Q&AI, product information and instruction materials on its website and various service and customer support) to use the Accused Products in ways that directly infringe the '035 Patent. Defendant does so knowing and intending that its customers and end users will commit these infringing acts. Defendant also continues to make, use, offer for sale, sell, and/or import the Accused Products, despite its knowledge of the '035 Patent, thereby specifically intending for and inducing its customers to infringe the '035 Patent through the customers' normal and customary use of the Accused Products.

86. To the extent discovery confirms that particular components or functionality of the Accused Products constitute a material part of the inventions claimed in the '035 Patent, are especially made or adapted for infringing use, and are not staple articles or commodities of

commerce suitable for substantial non-infringing use, Defendant has contributorily infringed and continues to contributorily infringe the '035 Patent under 35 U.S.C. § 271(c).

87. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Defendant has injured Plaintiff and is liable for infringement of the '035 Patent pursuant to 35 U.S.C. § 271.

88. As a result of Defendant's infringement of the '035 Patent, Plaintiff is entitled to monetary damages in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of the invention by Defendant, together with interest and costs as fixed by the Court.

89. Defendant also has knowledge of the '035 Patent at least due to the filing and service of this Complaint, and based on that knowledge, Defendant willfully infringes the '035 Patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

(a) A judgment in favor of Plaintiff that Defendant has infringed the '520 Patent, the '055 Patent and the '035 Patent;

(b) A judgment and order requiring Defendant to pay Plaintiff its damages, costs, expenses, and pre-judgment and post-judgment interest for Defendant's infringement of the '520 Patent, the '055 Patent and the '035 Patent;

(c) A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Defendant;

(d) An award of enhanced damages to Plaintiff as a result of Defendant's willful infringement;

(e) An accounting and supplemental damages for all infringement not presented at trial through final judgment;

(f) Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Flow Motion hereby demands a trial by jury on all issues so triable by right.

Dated: July 24, 2026

Respectfully submitted,

/s/ Robert M. Harkins w/ permission

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William E. Davis, III

State Bar No. 24047416

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Thomas M. Dunham

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DC Bar No. 975433

Stephanie R. Wood
TX Bar No. 24057928
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DEVELOPMENT LTD**