

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ICON HEALTH & FITNESS, INC.,)	
)	
Plaintiff,)	
)	C.A. No. _____
v.)	JURY TRIAL DEMANDED
)	
PELOTON INTERACTIVE, INC.)	
)	
Defendant.)	

**ICON HEALTH & FITNESS, INC.’S COMPLAINT FOR
PATENT INFRINGEMENT**

Plaintiff ICON Health & Fitness, Inc. (“ICON”) hereby complains against defendant Peloton Interactive, Inc. (“Peloton”) as follows:

PARTIES

1. ICON is a corporation organized and existing under the laws of Delaware with its principal place of business located at 1500 South 1000 West, Logan, Utah 84321.
2. Peloton is a corporation organized and existing under the laws of Delaware with its principle place of business located at 158 West 27th Street, New York, New York 10001.

JURISDICTION AND VENUE

3. This is an action for patent infringement pursuant to 35 U.S.C. § 271 *et seq.*
4. This Court has subject matter jurisdiction over the patent claims pursuant to 28 U.S.C. §§ 1331 and 1338.
5. Peloton is incorporated in this District, and Peloton has purposefully availed itself of the benefits and protections of the laws of the State of Delaware.
6. Peloton intends to and does promote, use, offer for sale, and sell the infringing products and services described herein to customers in this District.

7. Peloton advertises, markets, sells, and offers its products and services through its websites, which advertising, marketing, selling, and offerings are available to the purchasing public across the United States, including in this District.

8. This Court's exercise of personal jurisdiction over Peloton is consistent with the Constitutions of the United States and the State of Delaware.

9. Venue is proper in this District pursuant to 28 U.S.C. § 1400 because Peloton resides within this District and has committed, and continues to commit, acts of patent infringement within this District.

INTRODUCTION

ICON'S HISTORY OF INNOVATION

10. ICON began building its business in 1977 upon creativity, investment, and hard work. This led to a stable, inventive, and diversified fitness company built upon hundreds of industry-leading patents and the most well-known brands in the industry, including NordicTrack®, ProForm®, and iFIT®.

11. ICON was the first to develop and commercialize interactive connected technology that allowed in-home, live, and on-demand instructor led classes with competition and leaderboards (i.e., iFIT) at least 12 years before Peloton was founded.

12. ICON demonstrated its first iteration of iFIT in the late 1990s at a well-known fitness sporting goods, team sport, and fitness tradeshow called the Atlanta Super Show at the Georgia World Congress Center. For that show, ICON created a remote studio-based treadmill class that was led by an instructor located at ICON's headquarters in Utah and presented remotely to class participants in Atlanta. The instructor led the remote users through a treadmill class, and the speed and incline of the users' treadmills was remotely controlled by the instructor

in Utah. Nothing like this had been seen in the fitness industry. ICON was awarded many industry-leading patents covering this technology.

13. Many of those industry-leading patents allowed ICON to be the sole provider of treadmills, exercise bikes, rowers, ellipticals, and cabled strength machines with a remote-control feature for nearly 20 years. ICON invested a tremendous amount of time and resources to develop its remote-control technology nearly 20 years ago, and it has continued to invest in further generations of this technology. ICON must protect that investment and the patent rights it has been granted—and expects to still be granted in the future—against infringers like Peloton.

14. ICON's United States Patent No. 10,864,407 ("407 Patent") is an example of further generations of ICON's iFit technology. The '407 Patent generally discloses and claims technology to automatically control an exercise device in conjunction with an interactive integrated weight system. This system allows a user to obtain the benefit of automatic control and programming customized for their fitness goals, and seamlessly integrates both aerobic (cardio) and anaerobic (weight/resistance training) into a single exercise using a single device.

15. ICON's '407 Patent teaches a system that allows users to save space and time, and still obtain the benefit of a customized, automatically controlled, combined cardio and strength training workout.

PELTON'S HISTORY OF INFRINGEMENT AND LACK OF INNOVATION

16. Since its inception, Peloton has proved itself an infringer and demonstrated a pattern of copying ICON's innovations:

- In 2016, ICON was forced to sue Peloton for patent infringement based on its first and then only product, the Peloton Bike. That case was resolved.

- In 2020, ICON was also forced to sue Peloton for patent infringement by Peloton’s Tread product. That case is currently pending in this Court, *Peloton Interactive, Inc. v. ICON Health & Fitness, Inc.*, CA No. 20-662-RGA.
- Also in 2020, Peloton’s pattern of infringement required ICON to bring another patent infringement case based upon Peloton’s release of its Bike+. That case is currently pending in this Court, *ICON Health & Fitness, Inc. v. Peloton Interactive, Inc.*, CA No. 20-1386-RGA.
- ICON has now been forced to file the current action—the fourth patent infringement case against Peloton.

PELOTON’S CURRENT INFRINGEMENT

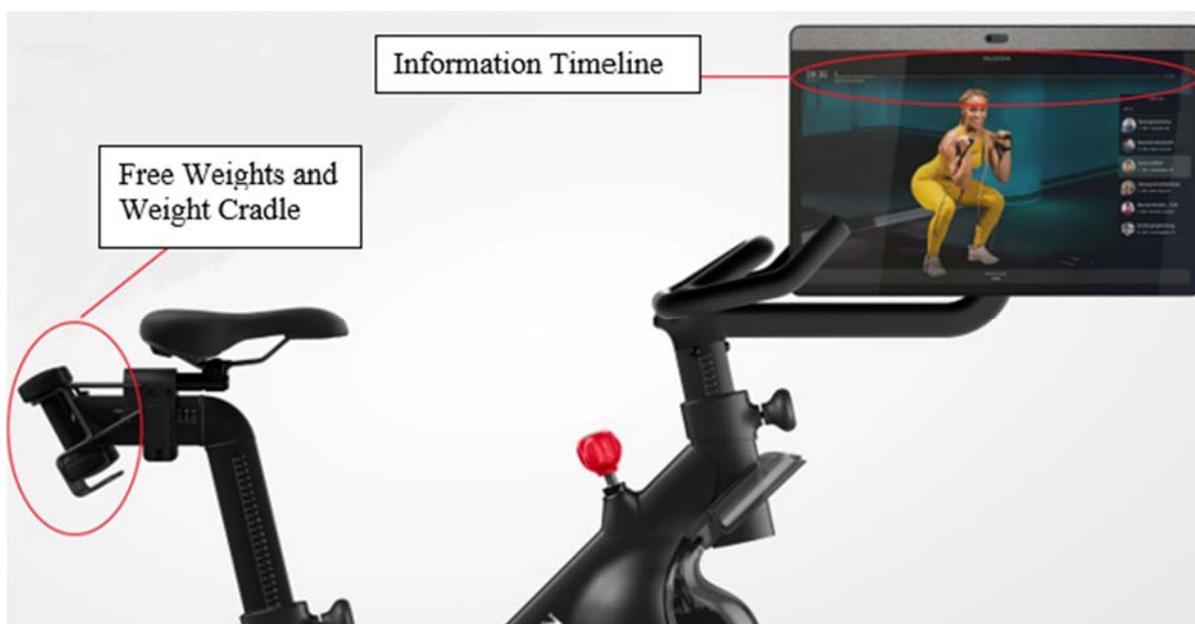
BIKE+ IS THE MOST RECENT EXAMPLE OF PELOTON’S PATTERN OF COPYING ICON’S TECHNOLOGY

17. Peloton’s most recent infringement relates to its Bike+ product.
18. Peloton began offering the Bike+ and associated app on September 9, 2020, which incorporates ICON’s patented automatic control and interactive integrated weight system as a key new feature. Peloton calls the automatic control “Auto Follow.” Auto Follow automatically adjusts the bike’s resistance to match an instructor’s callout:



19. Peloton advertises the Auto Follow feature as key to its new premium Bike+ product. Bike+ consumers and media outlets praise Peloton's Auto Follow feature—apparently unaware that Peloton, rather than innovating, is actually infringing ICON's longstanding intellectual property rights.

20. Auto-Follow is paired with a weight cradle on the Bike+ and other features that tell a user when to alternate between using the free weights and using the Bike+ (e.g., the information timeline). Below is a high-level depiction of this arrangement:



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.