

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

JOHNSON HEALTH TECH CO., LTD., and
JOHNSON HEALTH TECH NORTH
AMERICA, INC.,

Case No. 3:22-cv-606

JURY TRIAL DEMANDED

Plaintiff,

v.

PELOTON INTERACTIVE, INC.,

Defendant.

COMPLAINT

Plaintiffs Johnson Health Tech Co., Ltd. and Johnson Health Tech North America, Inc. (collectively, “JHT” or “Plaintiffs”), by its counsel, Michael Best & Friedrich LLP, alleges as follows for its Complaint against Defendant Peloton Interactive, Inc. (“Peloton” or “Defendant”).

NATURE OF THE ACTION

1. This is an action for patent infringement under the patent laws of the United States, 35 U.S.C. § 100 *et seq.*, including 35 U.S.C. § 271, arising from Peloton making, using, selling, offering for sale and/or importing into the United States one or more products that infringe U.S. Patent Nos. 10,032,227 (“the ‘227 patent”); 10,796,375 (“the ‘375 patent”); 11,227,340 (“the ‘340 patent”) (collectively, “the JHT patents”), including the Peloton Tread and Tread+ (“Accused Products”).

THE PARTIES

2. Johnson Health Tech Co., Ltd., is a company organized under the laws of Taiwan R.O.C. with its principal place of business at No. 26, Ching Chuan Rd., Taya Hsiang, Taichung Hsien 428, Taiwan R.O.C. Johnson Health Tech is in the business of making and selling, among

other things, fitness and rehabilitation equipment, including treadmills and software related to that equipment.

3. Johnson Health Tech North America, Inc. is a corporation organized under the laws of the state of Wisconsin with its principal place of business at 1600 Landmark Drive, Cottage Grove, Wisconsin 53527, and is a wholly owned subsidiary of Johnson Health Tech Co., Ltd.

4. Upon information and belief, Peloton is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 125 West 25th Street, 11th Floor, New York, New York, 10001.

5. Peloton has a showroom located at 708 N. Midvale Blvd., Madison, Wisconsin 53705.

6. Peloton provides personalized demonstrations of, and sells and offers to sell, Accused Products at its Madison, Wisconsin showroom.

JURISDICTION AND VENUE

7. JHT's claim arises under the patent laws of the United States, Title 35 of the United States Code.

8. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

9. This Court has personal jurisdiction over Peloton.

10. Peloton has continuous and systematic contacts with the State of Wisconsin through, among other things, offering for sale and selling the Accused Products and other products to consumers, as well as, having a showroom and employees in the Western District of Wisconsin.

11. Peloton's offers for sale and sales of the Accused Products in the Western District of Wisconsin form a substantial part of the acts giving rise to JHT's claims.

12. Exercise of jurisdiction over Peloton in the Western District of Wisconsin is consistent with the United States Constitution and laws because it would comport with due process and would be reasonable and fair.

13. Venue is proper in this judicial district pursuant to at least 28 U.S.C. §§1391(b)(2) and 1400 because Peloton has committed acts of infringement and has a regular and established place of business in the Western District of Wisconsin, and because a substantial part of the events or omissions giving rise to the claim occurred in the Western District of Wisconsin.

JHT AND THE JHT PATENTS

14. JHT is the largest specialty fitness retailer in the United States and offers award winning fitness and wellness products from brands like Matrix Fitness, Vision Fitness, Horizon Fitness, Hoist, and Octane, as well as others.

15. JHT is an industry leader in developing fitness and wellness equipment, such as treadmills, bikes, ellipticals, and rowers, and a leading developer of software that controls and enhances fitness and wellness equipment.

16. The '227 patent, entitled "Exercise Apparatus with Exercise Use Verification Function and Verifying Method," was duly and legally issued by the United States Patent and Trademark Office on July 24, 2018. A true and correct copy of the '227 patent is attached to the Complaint as Exhibit A. The '227 patent is valid and enforceable.

17. The '375 patent, entitled "Exercise Apparatus with Exercise Use Verification Function and Verifying Method," was duly and legally issued by the United States Patent and

Trademark Office on October 6, 2020. A true and correct copy of the '375 patent is attached to the Complaint as Exhibit B. The '375 patent is valid and enforceable.

18. The '340 patent, entitled "Exercise Apparatus with Exercise Use Verification Function and Verifying Method," was duly and legally issued by the United States Patent and Trademark Office on January 18, 2022. A true and correct copy of the '340 patent is attached to the Complaint as Exhibit C. The '340 patent is valid and enforceable.

19. Johnson Health Tech. Co., LTD is the sole owner of the JHT patents.

20. Johnson Health Tech North America, Inc. is the exclusive licensee of the JHT patents.

21. As the owner and exclusive licensee of the JHT patents, JHT is authorized and has standing to bring legal action to enforce all rights arising from the JHT patents.

PELOTON'S ACCUSED PRODUCTS

22. On information and belief, Peloton has made, used, offered to sell, sold and/or imported into the United States, the Accused Products.

23. The following is a photograph of the Peloton Tread from Peloton's website, <https://www.onepeloton.com/tread/specs>:



24. The following is a photograph of the Peloton Tread+ from Peloton's website,
<https://www.onepeloton.com/tread-plus/sign-up>:



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