UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

Johnson Health Tech Co., Ltd., and Johnson Health Tech North America, Inc., Plaintiffs, vs. Peloton Interactive, Inc., Defendant.	Case No. 3:22-cv-606-jdp

Peloton's Response to Plaintiffs' Opening Exchange of Claim Terms and Proposed Constructions

Pursuant to Section 4 of the Court's Preliminary Pretrial Conference Order, Defendant Peloton Interactive, Inc. ("Peloton") hereby responds to Plaintiffs' Johnson Health Tech Co., Ltd., and Johnson Health Tech North America, Inc.'s ("JHT") Opening Exchange of Claim Terms and Proposed Constructions. Peloton reserves its right to amend and/or supplement this response, particularly in response to any amendment, supplementation, or clarification of Plaintiffs' infringement contentions and/or as the parties attempt to reach a stipulation on the meaning of claim terms.

Claim Terms	JHT's Proposed Construction	Peloton's Response
exercise use data	"an apparent amount of exercise based on movement of the operating member/unit"	"data that is generated in response to movement of the operating unit"
validated exercise use data	"exercise use data that has been determined to have occurred while the user is exercising"	"data that is generated during that portion of the time when the operating unit is moving and the sensor does detect engagement of the user with the operating unit"
non-validated exercise use data	"exercise use data that is not validated exercise use"	"data that is generated during that portion of the time when the operating unit is moving and the sensor does not detect engagement of the user with the operating unit"

DATED: September 8, 2023

s/ Michelle M. Kemp

Christopher G. Hanewicz
CHanewicz@perkinscoie.com
Michelle M. Kemp
MKemp@perkinscoie.com
Gabrielle E. Bina
GBina@perkinscoie.com
Kaitlin Dryden
KDryden@perkinscoie.com
PERKINS COIE LLP
33 E Main St, Ste 201
Madison, Wisconsin 53703-3095
Telephone: +1.608.663.7460
Facsimile: +1.608.663.7499

Ashlee E. Sherman (*pro hac vice*)
ASherman@perkinscoie.com
PERKINS COIE LLP
11452 El Camino Real, Ste 300
San Diego, California 92130-2080
Telephone: +1.858.720.5700
Facsimile: +1.858.720.5799

Attorneys for Defendant Peloton Interactive, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of September, 2023, I caused the foregoing to be served via electronic mail upon:

John C. Scheller
jcscheller@michaelbest.com
Shane A. Brunner
sabrunner@michaelbest.com
Fran M. Wiley
Fmwiley@michaelbest.com
Tanya M. Salman
tmsalman@michaelbest.com
J. Ryan Gray
JRGray@michaelbest.com
Michael Best and Friedrich LLP
One South Pickney Street, Suite 700
Madison, WI 53701-1806
Telephone: 608-257-3501

s/ Teresa Anders
Teresa Anders

163709988.1