

**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"

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s/ Michelle M. Kemp

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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:

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s/ Teresa Anders
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