UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LIFECORE FITNESS, LLC d/b/a
ASSAULT FITNESS,

Petitioner,

v.

WOODWAY USA, INC.

Patent Owner.

IPR2024-00083
U.S. Patent No. 11,465,005

PATENT OWNER'S UPDATED EXHIBIT LIST

EXHIBIT LIST

Exhibit No.	Exhibit
2001	*Reserved*
2002	Minute Entry for Claim Construction Hearing, *Woodway USA, Inc. v. LifeCORE Fitness, Inc.*, Case No. 3:22-cv-00492-JO-BLM, Dkt. 57 (S.D. Cal.)
2003	*Reserved*
2004	U.S. Patent No. 5,709,632 to Socwell
2005	Redline Comparison of Specifications for U.S. Patent Nos. 5,709,632 and 5,897,461
2006	U.S. Patent No. 8,986,169 to Bayerlein, *et al.*
2007	U.S. Patent No. 9,039,580 to Bayerlein, *et al.*
2008	Opening Expert Report of Dr. Robert Giachetti, *Chapco Inc. v. Woodway USA, Inc.*, C.A. No. 3:15-cv-01665 (JCH), Dkt. 216-1 (D. Conn.)
2009	Declaration of Robert Giachetti, *Chapco Inc. v. Woodway USA, Inc.*, C.A. No. 3:15-cv-01665, Dkt. 88-2 (JCH) (D. Conn.)
2010	*Reserved*
2011	U.S. Patent No. 7,115,073 to Nizamuddin
2012	*Reserved*
2013	*Reserved*
2014	*Reserved*

Exhibit No.	Exhibit
2015	Defendant's Second Amended Invalidity Contentions and Associated Claim Charts, *Woodway USA, Inc. v. LifeCORE Fitness, Inc.*, Case No. 3:22-cv-00492-JO-BLM (S.D. Cal.)
2016	Declaration of Kadie M. Jelenchick
2017	Declaration of Sarah E. Rieger
2018	Declaration of Dr. Kim Blair
2019	*Curriculum vitae* of Dr. Kim Blair
2020	Declaration of Eric A. Weber
2021	Additional Excerpts from Neil Sclater and Nicholas P. Chironis, Mechanisms & Mechanical Devices Sourcebook, Third Ed., (McGraw-Hill 2001) ("Sclater")
2022	January 10, 2024 Deposition Transcript of Robert Giachetti (IPR2023-00836, U.S. Patent No. 9,039,580)
2023	January 10, 2024 Deposition Transcript of Robert Giachetti (IPR2023-00849, U.S. Patent No. 10,799,745)
2024	January 9, 2024 Deposition Transcript of Robert Giachetti (IPR2023-00843, U.S. Patent No. 10,561,884)
2025	*Reserved*
2026	*Reserved*
2027	*Reserved*
2028	Woodway Non-Motorized Treadmills User Manual
2029	Altra Industrial Motion Product Brochure
2030	*Reserved*

Exhibit No.	Exhibit
2031	Press Release, Woodway USA, Inc., Woodway Debuts Speedboard at IHRSA Show (March 20, 2009) (on file with author)
2032	Woodway's Confidential Sales and Cost Data for CURVE Line of Treadmills From Woodway's Fiscal Years 2010 through 2024.
2033	Woodway's Confidential Sales and Placement Data for the CURVE Legacy Treadmill From Woodway's Fiscal Year 2009
2034	Woodway's Confidential Sales and Placement Data for the CURVE Legacy Treadmill from Woodway's Fiscal Year 2010
2035	Video: Woodway CURVE® Treadmill With Safety Device
2036	Video: Woodway CURVE® Treadmill Without Safety Device
2037	*Patents*, WOODWAY.COM, http://www.woodway/com/support/patents (last visited Jan. 29, 2024)
2038	Confidential List Price and Cost Information for the CURVE Line of Treadmills From Woodway's Fiscal Year 2008 through Dec. 31, 2023
2039	*Shop*, WOODWAY.COM, http://www.woodway/com/shop (last visited Jan. 23, 2024)
2040	*Treadmills*, ASSAULTFITNESS.COM, http://assaultfitness/com/collections/treadmills (last visited January 23, 2024)
2041	Search Results for Assault Air Runner for Sale Online, http://google.com (search "Assault Air Runner treadmill"; then follow "shopping" icon)

Exhibit No.	Exhibit
2042	*Chapco, Inc. and Samsara Fitness, LLC v. Woodway USA, Inc.*, Case No. 3:13-cv-1665 (JCH), Dkt. 144 (D. Conn. Sept. 26, 2017)
2043	Letter from Richard J. McKenna, Foley & Lardner LLP, to Christopher Kelly, Gym Store, Inc. (Oct. 21, 2014) (on file with author)
2044	March 2, 2017 Expert Report of Kim B. Blair, Ph.D., *Chapco, Inc. and Samsara Fitness, LLC v. Woodway USA, Inc.*, Case No. 3:15-cv-1665 (JCH) (D. Conn.)
2045	Lisa Malosky, HEALTH & FITNESS SPORTS MAGAZINE, February 2010
2046	ATHLETIC BUSINESS, March 2010
2047	Press Release, Woodway USA, Inc., Woodway CURVE Featured on NBC's The Biggest Loser (Dec. 29, 2010) (on file with author)
2048	Kelsey Cannon, *The Hardest 20-Minute Workout of Your Life*, MEN'S HEALTH, Mar. 4, 2014, https://www.menshealth.com/fitness/a19536030/instafit-harder-sprint-workout/ (last visited Jan. 30, 2024)
2049	*Watch: Move, Shape and Shred Your Body For Summer*, MEN'S HEALTH, May 3, 2017, https://www.menshealth.com/uk/building-muscle/a757686/watch-move-shape-shred/ (last visited Jan. 30, 2024)
2050	Kaleigh Ray, *The Woodway Curve*, TREADMILLREVIEWS.COM, Aug. 9, 2012, https://www.treadmillreviews.com/articles/the-woodway-curve/ (last visited Jan. 30, 2024)
2051	11Alive, *Megaformer workout combines curved Woodway treadmill for new workout*, YOUTUBE (Mar. 5, 2019), https://www.youtube.com/watch?v=QqlJIwsBRlc.

Exhibit No.	Exhibit
2052	Roy M. Wallack, *Treadmills, Ellipticals Tap Into Natural Power*, L.A. TIMES (Nov. 16, 2009), https://www.latimes.com/health/la-he-gear16-2009nov16-story.html (last visited Jan. 30, 2024)
2053	David Quick, *New Treadmill Creates Buzz*, POST & COURIER (July 21, 2009), http://www.postandcourier.com/news/2009/jul/21/new_treadmill_creates_buzz89834/ (last visited July 23, 2009)
2054	GOVERNMENT RECREATION & FITNESS, May 2020
2055	Rachel Bachman, *Treadmills Unplugged: A Gym Workout Powered by Your Feet*, WALL STREET JOURNAL (July 6, 2015), http://www.wsj.com/articles/treadmills-unplugges-a-gym-workout-powered-by-your-feet-1436202306.
2056	Rachel Zabonick-Chonko, *Treadmills Are Making a Comeback,* CLUB SOLUTIONS, Dec. 11, 2014, https://clubsolutionsmagazine/com/2014/12/treadmills-making-comeback/ (last visited Jan. 29, 2024)
2057	Press Release, FIBO, FIBO Jubilee With Many Innovations: Nominees Announces For FIBO INNOVATION AWARDS (Apr. 14, 2010) (on file with Woodway)
2058	*Treadmills*, TRUEFORMRUNNER.COM, https://trueformrunner.com/collections/treadmills-1/products/trueform-trainer (last visited Jan. 30, 2024)
2059	*Treadmills,* TECHNOGYM.COM, https://www.technogym.com/en-US/product/skillmill_DJK0.html (last visited Jan. 30, 2024)
2060	*Speedboard*, SPEEDFIT.COM, https://www.speedfit.com/SpeedboardPro.html (last visited Jan. 27, 2024)

Exhibit No.	Exhibit
2061	*Products*, *IN10CT Curved Manual Treadmill*, AXTIONFITNESS.COM, https://axtionfitness.com/products/in10ct-curved-manual-treadmill (last visited Jan. 29, 2024)
2062	*New Items*, XEBEXFITNESS.COM, https://xebexfitness.com (follow "new items"; then follow "Xebex AirPlus Runner Smart Connect") (last visited Jan. 29, 2024)
2063	*Shop*, *Sprintbok Treadmill*, WATERROWER.COM, http://www.waterrower.com/us/collection/nohrd-sprintbok (last visited Jan. 29, 2024)
2064	*Shop By Brand*, *Cascade Ultra Runner Plus Treadmill*, FITDIRECT.COM, https://fitdir.com/cascade-ultra-runner-plus-treadmill/ (last visited Jan. 29, 2024)
2065	*Cardio*, TRUGRIT-FITNESS.COM, https://trugrit-fitness.com/collections/cardio/products/grit-runner-curved-manual-treadmill (last visited Jan. 29, 2024)
2066	Woodway Infringement Contentions ('580 Patent), Samsara TrueForm Runner, *Chapco, Inc. and Samsara Fitness, LLC v. Woodway USA, Inc.*, Case No. 3:15-cv-1665 (JCH) (D. Conn.)
2067	Woodway's Infringement Contentions ('580 Patent), Assault Air Runner, *Woodway USA, Inc. v. LifeCORE Fitness, Inc. d/b/a Assault*, Case No. 3:22-cv-00492-JP (BLM) (S.D. Cal.)
2068	Woodway Infringement Contentions ('884 Patent), Assault Air Runner, *Woodway USA, Inc. v. LifeCORE Fitness, Inc. d/b/a Assault*, Case No. 3:22-cv-00492-JP (BLM) (S.D. Cal.)
2069	Woodway Infringement Contentions ('745 Patent), Assault Air Runner, *Woodway USA, Inc. v. LifeCORE Fitness, Inc. d/b/a Assault*, Case No. 3:22-cv-00492-JP (BLM) (S.D. Cal.)

Exhibit No.	Exhibit
2070	Woodway Infringement Contentions ('005 Patent), Assault Air Runner, *Woodway USA, Inc. v. LifeCORE Fitness, Inc. d/b/a Assault*, Case No. 3:22-cv-00492-JP (BLM) (S.D. Cal.)
2071	Owner's Manual, Assault Air Runner Manual Treadmill
2072	Marketing Material, Assault Air Runner
2073	Proposed Protective Order
2074	Proposed Protective Order Redline
2075	LifeCore Fitness, LLC Certificate of Conversion and Certificate of Formation
2076	Order Setting Deadlines, *Woodway USA, Inc. v. LifeCORE Fitness, Inc.*, Case No. 3:22-cv-00492-JO-BLM, Dkt. 63 (S.D. Cal.)
2077	Order Granting in Part and Denying in Part Defendant's Motion to Stay, *Woodway USA, Inc. v. LifeCORE Fitness, Inc.*, Case No. 3:22-cv-00492-JO-BLM, Dkt. 73 (S.D. Cal.)
2078	Woodway USA, Inc.'s First Amended and Supplemental Disclosure of Asserted Claims and Infringement Contentions (Redacted), *Woodway USA, Inc. v. LifeCORE Fitness, Inc.*, Case No. 3:22-cv-00492-JO-BLM (S.D. Cal.)
2079	Transcript of Hearing on Motion to Stay, *Woodway USA, Inc. v. LifeCORE Fitness, Inc.*, Case No. 3:22-cv-00492-JO-BLM (S.D. Cal.)
2080	Woodway USA, Inc.'s Opposition to LifeCORE Fitness, Inc's Motion to Stay Litigation Pending *Inter Partes* Review, *Woodway USA, Inc. v. LifeCORE Fitness, Inc.*, Case No. 3:22-cv-00492-JO-BLM, Dkt. 66 (S.D. Cal.)

Exhibit No.	Exhibit
2081	Defendant's Memorandum and Points of Authority in Support of Motion to Stay Litigation Pending *Inter Partes* Review, *Woodway USA, Inc. v. LifeCORE Fitness, Inc.*, Case No. 3:22-cv-00492-JO-BLM, Dkt. 60-1 (S.D. Cal.)
2082	July 30, 2024 Deposition Transcript of Robert Giachetti (IPR2024-00083, U.S. Patent No. 11,465,005)
2083	Woodway CURVE Treadmill Claim Chart ('005 Patent)
2084	LifeCORE Fitness, Inc. d/b/a Assault Fitness confidential sales information relating to the Assault AirRunner models, produced in *Woodway USA, Inc. v. LifeCORE Fitness, Inc. d/b/a Assault* Fitness, Case No. 3:22-cv-00492-JO-BLM (S.D. Cal.) as LCF035149 and marked as Deposition Exhibit 109
2085	Supplemental Declaration of Eric A. Weber
2086	Jack Carroll Declaration In Support of *PRO HAC VICE* Motion
2087	Order Granting Defendant's Motion for Summary Judgment and Denying Plaintiff's Motion for Summary Judgment - Case 3:22-cv-00492-JO-BLM
2088	Woodway's Notice of Appeal - Case 3:22-cv-00492-JO-BLM

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Patent Owner's Updated Exhibit List** was served on February 13, 2025, by email to Petitioner's counsel of record:

jhalan@brookskushman.com

aturner@brookskushman.com

rcantor@brookskushman.com

kkonz@brookskushman.com

LCF0115IPR@brookskushman.com

Dated: February 13, 2025

/R.J. McKenna/
Richard J. McKenna
Registration No. 35,610
Counsel for Patent Owner