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Attorneys for HYPER ICE, INC. and
HYPERICE IP SUBCO, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

HYPER ICE, INC., a California
corporation and HYPERICE IP
SUBCO, LLC, a Delaware limited
liability company,

Plaintiff,

v.

THERABODY, INC.,

Defendant.

**CASE NO. 8:24-cv-00390-JWH-
DFMx**

**PLAINTIFFS' DISCLOSURE OF
ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS
(P.R. 3-1 & 3-2)**

Pursuant to P.R. 3-1 and 3-2, Plaintiffs Hyper Ice, Inc. and Hyperice IP Subco, LLC (“Plaintiffs” or, collectively, “Hyperice”) state as follows:

(a) Each claim of each patent in suit that is allegedly infringed by each opposing party, including for each claim the applicable statutory subsections of 35 U.S.C. §271 asserted.

Based on publicly-available information, and without the benefit of discovery in this action, Hyperice contends that Defendant Therabody, Inc. (“Defendant” or “Therabody”) directly infringes, pursuant to 35 U.S.C. §271(a), numerous claims of U.S. Patent No. 11,857,482 (“the ‘482 Patent”). Attached hereto are claim charts detailing the claims that Defendant infringes. Hyperice reserves the right to amend and/or supplement the identification of asserted claims as discovery progresses, in response to the Court’s claim construction, and otherwise in accordance with the Patent Rules, Local Rules, and/or any Court Order.

(b) Separately for each asserted claim, each accused apparatus, product, device, process, method, act, or other instrumentality (“Accused Instrumentality”) of each opposing party of which the party is aware. This identification shall be as specific as possible. Each product, device, and apparatus shall be identified by name or model number, if known. Each method or process shall be identified by name, if known, or by any product, device, or apparatus which, when used, allegedly results in the practice of the claimed method or process.

Based on publicly-available information, and without the benefit of discovery in this action, the claim charts attached hereto detail the claims infringed by each Accused Instrumentality sold by Defendant. Hyperice reserves the right to amend and/or supplement the identification of accused products as discovery progresses, in response to the Court’s claim construction, and otherwise in accordance with the Patent Rules, Local Rules, and/or any Court Order.

(c) A chart identifying specifically where and how each limitation of each asserted claim is found within each Accused Instrumentality, including for each

1 *limitation that such party contends is governed by 35 U.S.C. § 112(6), the identity*
2 *of the structure(s), act(s), or material(s) in the Accused Instrumentality that*
3 *performs the claimed function.*

4 Based on publicly-available information, and without the benefit of discovery
5 in this action, the claim charts attached hereto detail that the Accused Instrumentalities
6 literally meet each element of each asserted claim. Hyperice does not presently
7 contend that any element is governed by 35 U.S.C. § 112(6). Hyperice reserves the
8 right to amend and/or supplement as discovery progresses, in response to the Court's
9 claim construction, and otherwise in accordance with the Patent Rules, Local Rules,
10 and/or any Court Order.

11 ***(d) For each claim which is alleged to have been indirectly infringed, an***
12 ***identification of any direct infringement and a description of the acts of the alleged***
13 ***indirect infringer that contribute to or are inducing that direct infringement.***
14 ***Insofar as alleged direct infringement is based on joint acts of multiple parties, the***
15 ***role of each such party in the direct infringement must be described.***

16 Based on publicly-available information, and without the benefit of discovery
17 in this action, Hyperice states that it does not presently contend that Defendant
18 indirectly infringes any claim of the '482 Patent. Hyperice reserves the right to amend
19 and/or supplement as discovery progresses, in response to the Court's claim
20 construction, and otherwise in accordance with the Patent Rules, Local Rules, and/or
21 any Court Order.

22 ***(e) Whether each element of each asserted claim is claimed to be literally***
23 ***present or present under the doctrine of equivalents in the Accused Instrumentality.***

24 Based on publicly-available information, and without the benefit of discovery
25 in this action, the claim charts attached hereto detail that the Accused Instrumentalities
26 literally meet each element of each asserted claim. If any of the limitations are not
27 literally met, the Accused Instrumentalities meet the limitations under the doctrine of
28 equivalents, because they perform the same function in substantially the same way to

1 achieve substantially the same result, and/or because the relevant structures and
2 functions of the infringing products are insubstantially different from the claimed
3 limitations. Hyperice reserves the right to amend and/or supplement as discovery
4 progresses, in response to the Court's claim construction, and otherwise in accordance
5 with the Patent Rules, Local Rules, and/or any Court Order.

6 **(e) For any patent that claims priority to an earlier application, the priority**
7 **date to which each asserted claim allegedly is entitled.**

8 The asserted claims of the '482 Patent are entitled to a priority date of July 1,
9 2013.

10 **(f) If a party claiming patent infringement wishes to preserve the right to**
11 **rely, for any purpose, on the assertion that its own apparatus, product, device,**
12 **process, method, act or other instrumentality practices the claimed invention, the**
13 **party must identify, separately for each asserted claim, each such apparatus,**
14 **product, device, process, method, act, or other instrumentality that incorporates or**
15 **reflects that particular claim.**

16 Hyperice contends that the following products currently sold by Hyperice – the
17 Hypervolt 2 Pro, Hypervolt 2, and Hypervolt Go 2 – practice the following claims of
18 the '482 Patent: Claims 1, 2, 3, 4, 5, 7, 8, 10, 11, 12, 13, 24, 25, 26, 27, and 28.

19 **(f) Identify the timing of the point of first infringement, the start of**
20 **claimed damages, and the end of claimed damages.**

21 Hyperice contends that the first infringement occurred on Jan. 2, 2024 – the
22 issue date of the '482 Patent – when Defendant offered for sale and/or sold one or
23 more of the Accused Instrumentalities. Because Hyperice complied with the patent
24 marking statute by virtually marking its products, and because Hyperice updated its
25 listing of patents at www.hyperice.com/patents on Jan. 2, 2024 with the '482 Patent,
26 the start of claimed damages is Jan. 2, 2024. Based on publicly available information,
27 Defendant continues to offer for sale and sell the Accused Instrumentalities, and the
28 damages period continues to run.

1 (g) *If a party claiming patent infringement alleges willful infringement,*
2 *the basis for such allegation.*

3 Hyperice contends that Defendant willfully infringes the ‘482 Patent. By no
4 later than January 3, 2024, Defendant knew of the ‘482 Patent and knew, or acted
5 with willful, intentional, and conscious disregard of the objectively high likelihood,
6 that its conduct constitutes infringement of the ‘482 Patent. On January 3, 2024,
7 Hyperice filed suit in the United States District Court for the District of Delaware,
8 alleging infringement of the ‘482 Patent. *Hyper Ice, Inc. et al. v. Therabody, Inc.*,
9 Case No. 1:24-cv-00004 (the “Delaware Litigation”). On February 16, 2024,
10 Hyperice filed a First Amended Complaint in the Delaware Litigation, and Hyperice
11 included the detailed claim charts that are attached hereto as Exhibits 2-5. Moreover,
12 Hyperice had provided the claim charts and related videos to Therabody’s counsel
13 prior to filing the First Amended Complaint in the Delaware Litigation.
14 Subsequently, Hyperice dismissed the Delaware Litigation and filed this action
15 against Defendant. As such, Defendant knew of the ‘482 Patent and knew, or acted
16 with willful, intentional, and conscious disregard of the objectively high likelihood,
17 that its conduct constitutes infringement of the ‘482 Patent.

DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE

Pursuant to P.R. 3-2, and after conducting a reasonable search, Hyperice identifies documents for production as described below. Hyperice reserves the right to supplement and/or amend the disclosure as necessary. In addition, Hyperice intends to produce additional Confidential and/or Highly Confidential documents responsive to the categories listed below once a Protective Order is entered in the above-captioned matter.

P.R. 3-2 Documents	Production Number
(a) Documents (e.g., contracts, purchase orders, invoices, advertisements, marketing materials, offer letters, beta site testing agreements, and third party or joint development agreements) sufficient to evidence each discussion with, disclosure to, or other manner of providing to a third party, or sale of or offer to sell, or any public use of, the claimed invention prior to the date of application for the patent in suit. A party's production of a document as required herein shall not constitute an admission that such document evidences or is prior art under 35 U.S.C. § 102;	Hyperice is not presently aware of the existence of any such documents.

P.R. 3-2 Documents	Production Number
(b) All documents evidencing the conception, reduction to practice, design, and development of each claimed invention, which were created on or before the date of application for the patent in suit or the priority date identified pursuant to Patent L.R. 3-1(f), whichever is earlier.	Hyperice is not presently aware of the existence of any such documents.
(c) A copy of the file history for each patent in suit.	See HYPER-TBDY000066–HYPER-TBDY002677
(d) All documents evidencing ownership of the patent rights by the party asserting patent infringement.	See HYPER-TBDY002678–HYPER-TBDY002878. Additionally, Hyperice intends to produce certain additional Confidential and/or Highly Confidential documents once a Protective Order is entered in the above-captioned lawsuit.
(e) If a party identifies instrumentalities pursuant to Patent L.R. 3-1(g), documents sufficient to show the operation of any aspects or elements of such instrumentalities the patent claimant relies upon as embodying any asserted claims.	See HYPER-TBDY002879–HYPER-TBDY002899. Additionally, Hyperice intends to produce Confidential design files once a Protective Order is entered in the above-captioned lawsuit.

P.R. 3-2 Documents	Production Number
(f) All agreements, including licenses, transferring an interest in any patent-in-suit.	See HYPER-TBDY002678–HYPER-TBDY002878. Additionally, Hyperice intends to produce certain additional Confidential and/or HighlyConfidential documents once a Protective Order is entered in the above-captioned lawsuit.
(g) All agreements that may be related to the accused instrumentality or may be comparable to a license that would result from a hypothetical reasonable royalty negotiation.	All such documents are Confidential, and Hyperice will produce such documents once a Protective Order is entered in the above-captioned lawsuit.
(h) All agreements that otherwise may be used to support the party asserting infringement’s damages case.	Hyperice is not presently aware of the existence of any such additional documents, other than those referenced in (g) above.
(i) If a party identifies instrumentalities pursuant to Patent L.R. 3-1(g), documents sufficient to show marking of such embodying accused instrumentalities and if it wants to preserve the right to recover lost profits based on such products, sales, revenues, costs and profits of such embodying accused instrumentalities	See HYPER-TBDY002900–HYPER-TBDY002913. Additionally, Hyperice intends to produce certain additional Confidential and/or HighlyConfidential documents and spreadsheets once a Protective Order is entered in the above-captioned lawsuit.

P.R. 3-2 Documents	Production Number
(j) All documents comprising or reflecting a F/RAND commitment or agreement with respect to the asserted patent.	Hyperice is not presently aware of the existence of any such documents.

DATED: July 5, 2024

By: 

BENJAMIN A. HERBERT
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Attorneys for HYPER ICE, INC. and
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EXHIBIT 1

Claim Chart – U.S. Patent No. 11,857,482 – Theragun PRO

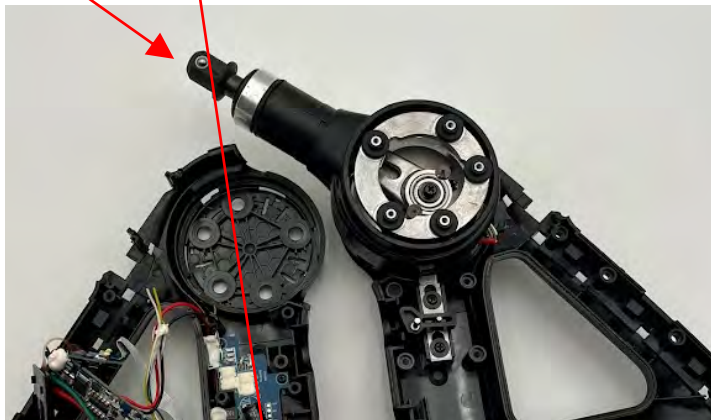
U.S. Patent No. 11,857,482	<u>Theragun PRO</u>
34. A percussive massager comprising:	The accused product is a percussive massager:  

a housing;

The accused product has a housing:



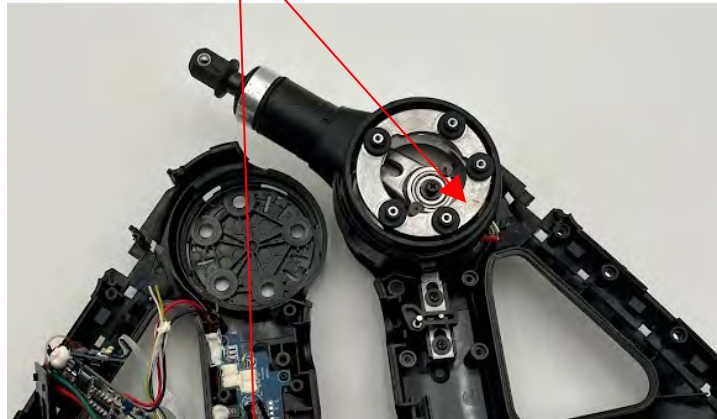
The accused product has a piston in the housing with a proximal end and a distal end. The proximal end of the piston is operatively connected to the drive mechanism, which includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc.:



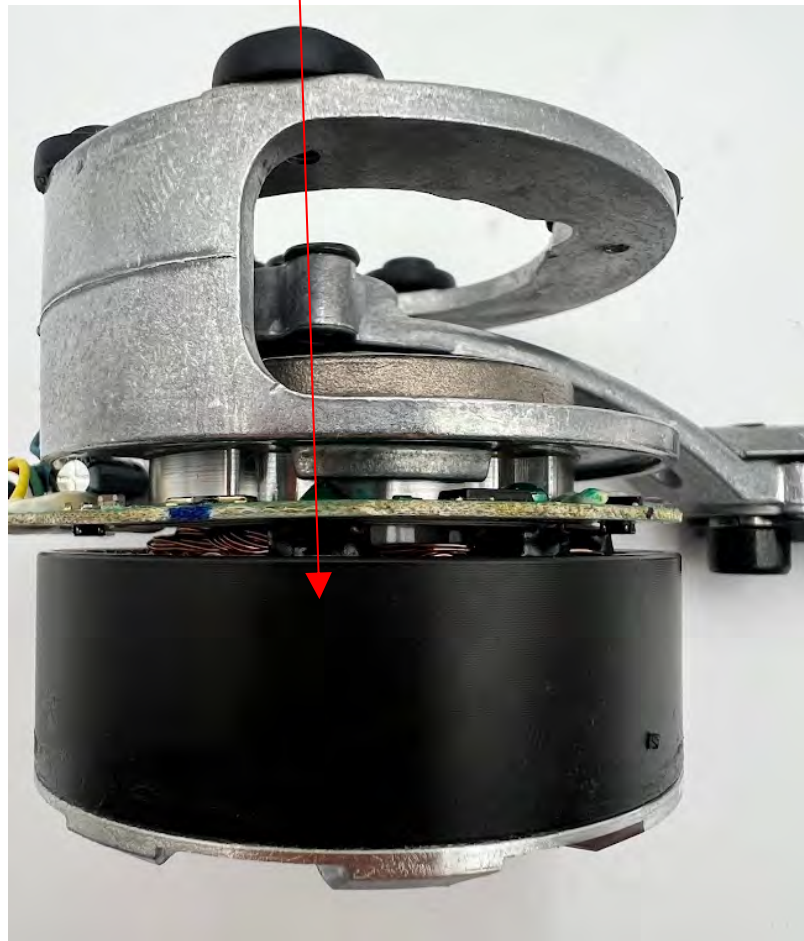
a piston in the housing having a proximal end and a distal end,



The accused product has a **motor** at least partially within the housing:



a motor at least partially
within the housing

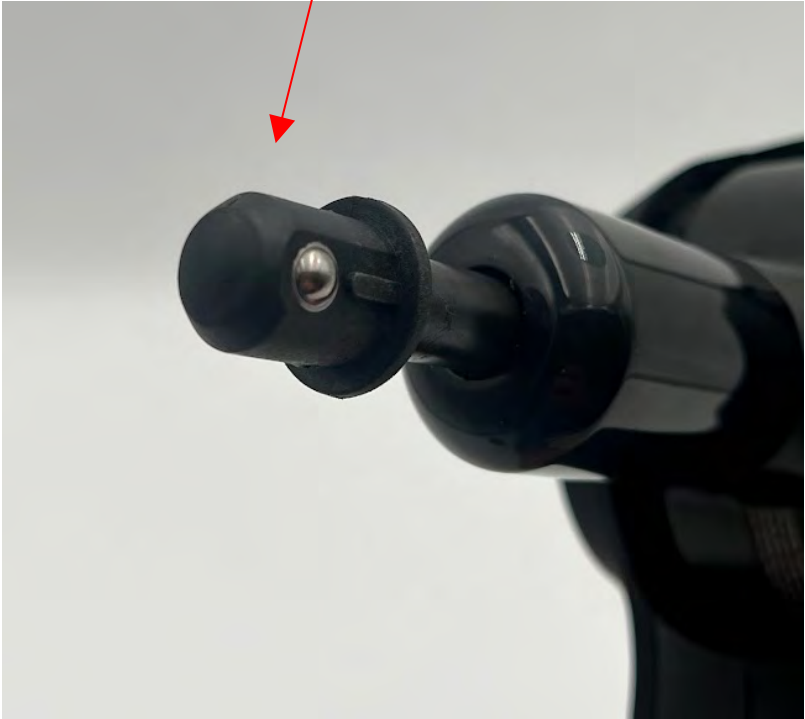


and operatively connected to the proximal end of the piston,	In the accused product, the motor is operatively connected to the proximal end of the piston by several structures including the motor shaft, flywheel, a crank pin, a connecting rod, etc.: 
wherein the motor is configured to cause the piston to reciprocate at a first speed;	In the accused product, the motor is configured to cause the piston to reciprocate at a first speed. <i>See Video 1.</i>

The accused product has a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston. The drive mechanism includes the includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc. The stroke length depends on the amount of offset between the centerline of the flywheel and the crank pin.

a drive mechanism
between the motor and
the piston that controls a
predetermined stroke
length of the piston; and



a quick release connector at the distal end of the piston,	The accused product has a quick release connector at the distal end of the piston: 
wherein the quick release connector is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed,	The quick release connector of the accused product is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed. <i>See videos produced herewith.</i>

wherein the first
massaging head has a
substantially cylindrical
pocket to receive the quick
release connector.

The first massaging head of the accused product has a substantially
cylindrical pocket to receive the quick release connector:



35. The percussive massager of claim 34, further comprising:
a second massaging head configured to releasably couple to the distal end of the piston via the quick release connector.

The accused product is sold with a second massaging head that is configured to releasably couple to the distal end of the piston via the quick release connector.

Attachments

Your Theragun PRO comes with six different attachments designed for every muscle and need.

Dampener

For use on tender areas or near bones



Thumb

For lower back and trigger point therapy



Standard Ball

For overall, general use



Supersoft™

When you need a soft touch



Wedge

For scraping, shoulder blades, or IT bands



Micro-point

Provides increased stimulation throughout the treatment



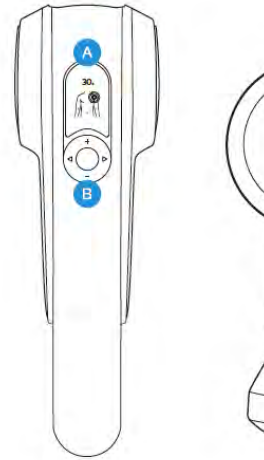
See also videos produced herewith.

36. The percussive massager of claim 34, wherein the motor is configured to cause the piston to reciprocate the predetermined stroke length at a second speed.	The motor of the accused product is configured to cause the piston to reciprocate the predetermined stroke length at multiple speeds. Getting started Step 1 Get the Therabody app We'll guide you through a stress-free setup and show you how to get the most out of your Theragun PRO. Step 2 Turn on and float Firmly press and hold the center button on the button pad, then float the Theragun PRO across areas in need. Use the plus (+) and minus (-) buttons on the button pad to adjust the speed. Apply light to moderate pressure as needed. Step 3 Feel the difference.™ Every day. Take a deep breath and treat yourself with guided treatment presets or freestyle mode. It's all designed for you.
37. The percussive massager of claim 36, wherein the first speed and the second speed are each less than or equal to 3600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are less than or equal to 3600 strokes per minute. <i>See also</i> videos produced herewith.
38. The percussive massager of claim 36, wherein the first speed and the second speed are each greater than or equal to 600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are greater than or equal to 600 strokes per minute. <i>See also</i> videos produced herewith.

40. The percussive massager of claim 36, further comprising:
a control panel positioned on an exterior of the housing

The accused product has a control panel on the exterior of the housing.

The Theragun PRO



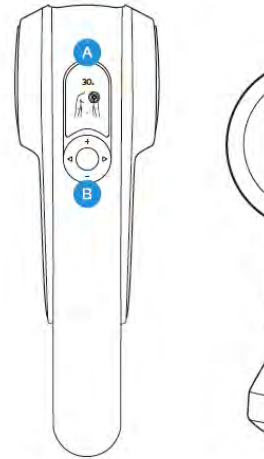
- A High-res color display screen
- B Button pad
- C Theragun 1 ergonomic
- D Lithium-ion

See also videos produced herewith.

41. The percussive massager of claim 40, wherein the control panel is configured to display one or more visual indicators.

The control panel of the accused product displays one or more visual indicators.

The Theragun PRO



A High-res color display screen

B Button pad

C Theragun 1 ergonomic

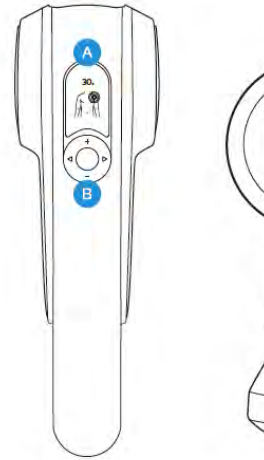
D Lithium-ion

See also videos produced herewith.

43. The percussive massager of claim 40, wherein the control panel has one or more inputs.

The control panel of the accused product has one or more inputs.

The Theragun PRO



- A High-res color display screen
- B Button pad
- C Theragun 1 ergonomic
- D Lithium-ion

Getting started

Step 1

Get the Therabody app

We'll guide you through a stress-free setup and show you how to get the most out of your Theragun PRO.

Step 2

Turn on and float

Firmly press and hold the center button on the button pad, then float the Theragun PRO across areas in need. Use the plus (+) and minus (-) buttons on the button pad to adjust the speed. Apply light to moderate pressure as needed.

Step 3

Feel the difference.™ Every day.

Take a deep breath and treat yourself with guided treatment presets or freestyle mode. It's all designed for you.

	<i>See also</i> videos produced herewith.
44. The percussive massager of claim 43, wherein the one or more inputs comprise at least one of: a button, a switch, and a dial.	The control panel of the accused product has an input comprising a button. Getting started Step 1 Get the Therabody app We'll guide you through a stress-free setup and show you how to get the most out of your Theragun PRO. Step 2 Turn on and float Firmly press and hold the center button on the button pad, then float the Theragun PRO across areas in need. Use the plus (+) and minus (-) buttons on the button pad to adjust the speed. Apply light to moderate pressure as needed. Step 3 Feel the difference.™ Every day. Take a deep breath and treat yourself with guided treatment presets or freestyle mode. It's all designed for you. <i>See also</i> videos produced herewith.

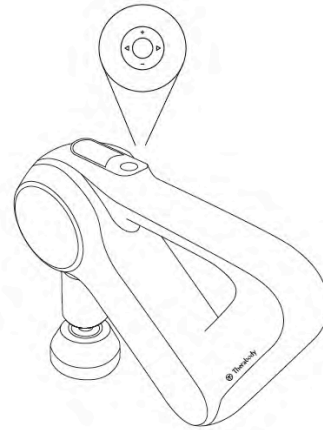
46. The percussive massager of claim 43, wherein a first selection of the one or more inputs is configured to cause the percussive massager to power on and wherein a second selection of the one or more inputs is configured to cause the percussive massager to power off.

The button on the control panel of the accused product turns the product on or off.

Using the Theragun PRO

1. Insert the pre-charged lithium-ion battery fully before turning on the Theragun PRO.
2. To turn on, firmly press and hold the center button on the button pad.
3. Press the left (<) and right (>) arrows on the button pad to toggle between the pre-loaded treatment presets.
4. Once the treatment is selected, Use plus (+) and minus (-) to increase or decrease speed.
5. To turn off, firmly press and hold the center button on the button pad until the device shuts down.

Note: We recommend no more than two minutes of continuous use on any muscle group.



See also videos produced herewith.

58. The percussive massager of claim 34, wherein the motor has an output shaft configured to rotate about a rotation axis, and wherein the drive mechanism comprises:
a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston.

In the accused product, the motor has an output shaft configured to rotate about a rotation axis, and the drive mechanism comprises a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston:



59. The percussive massager of claim 58, wherein an offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston.

In the accused product, the offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston:



60. The percussive massager of claim 59, wherein the motor is directly connected to the flywheel, and wherein the crank pin is directly connected to the flywheel.

In the accused product, the motor is directly connected to the flywheel, and the crank pin is directly connected to the flywheel.



EXHIBIT 2

Claim Chart – U.S. Patent No. 11,857,482 – Theragun Elite

U.S. Patent No. 11,857,482	<u>Theragun Elite</u>
34. A percussive massager comprising:	The accused product is a percussive massager:  

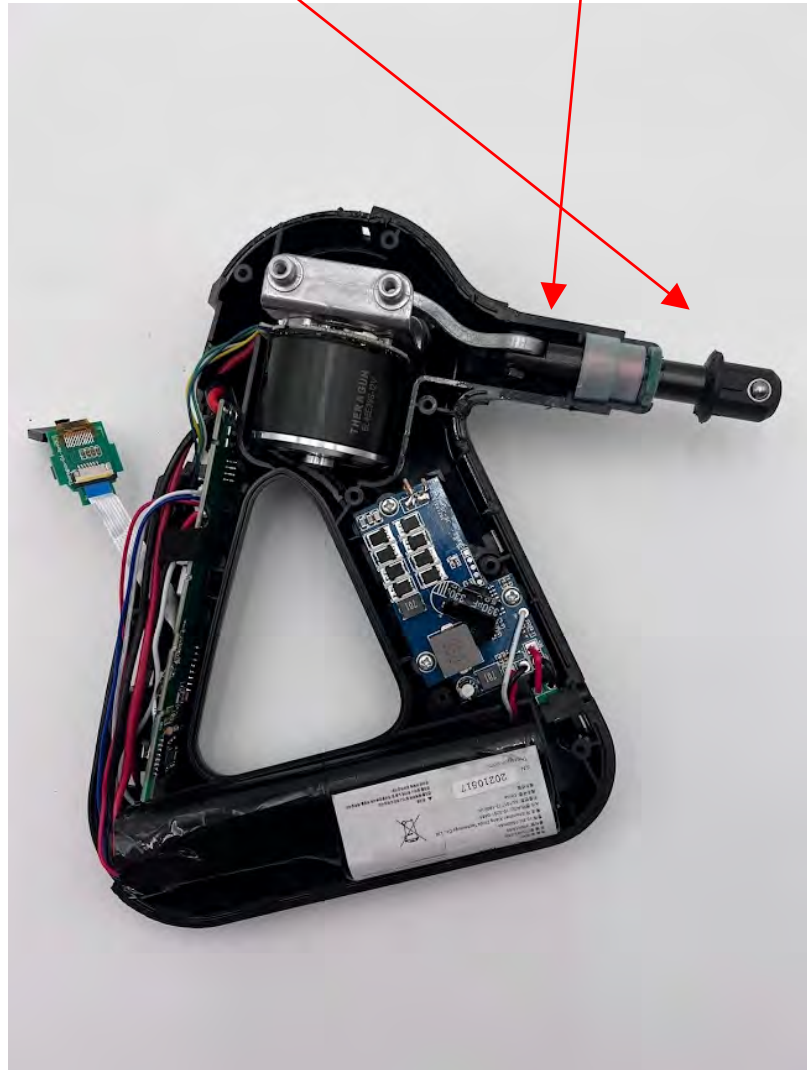
a housing;

The accused product has a housing:



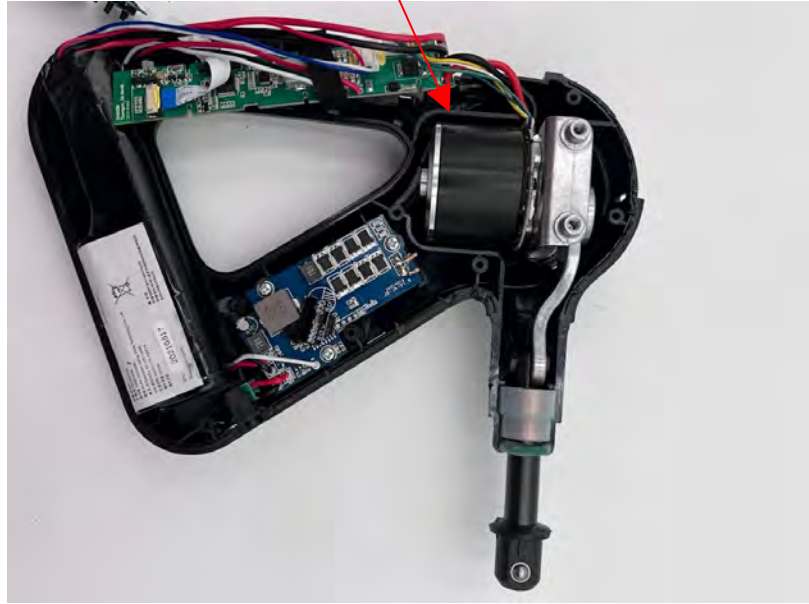
a piston in the housing having a proximal end and a distal end,

The accused product has a piston in the housing with a proximal end and a distal end. The proximal end of the piston is operatively connected to the drive mechanism, which includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc.:



a motor at least partially within the housing

The accused product has a **motor** at least partially within the housing:



and operatively connected to the proximal end of the piston,	In the accused product, the motor is operatively connected to the proximal end of the piston by several structures including the motor shaft, flywheel, a crank pin, a connecting rod, etc.: 
---	---

wherein the motor is configured to cause the piston to reciprocate at a first speed;	In the accused product, the motor is configured to cause the piston to reciprocate at a first speed. <i>See videos produced herewith.</i>
---	---

a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston; and

The accused product has a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston. The drive mechanism includes the includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc. The stroke length depends on the amount of offset between the centerline of the flywheel and the crank pin.

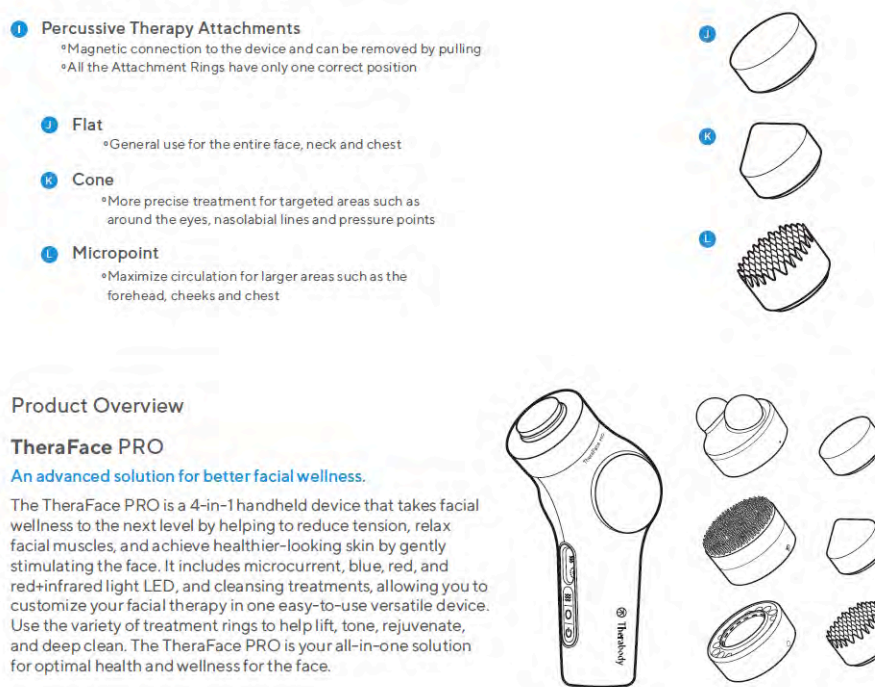
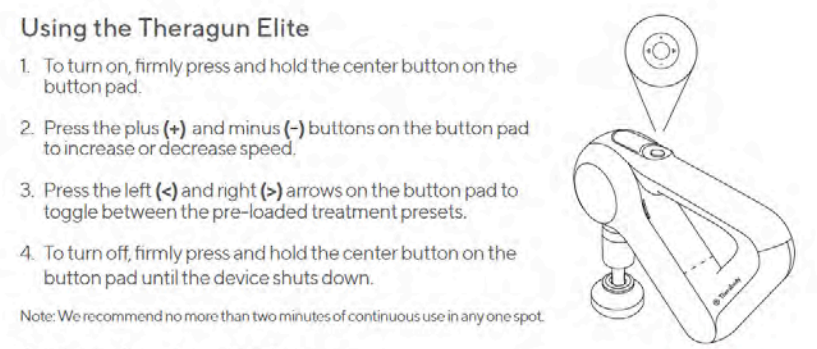


a quick release connector at the distal end of the piston,	The accused product has a quick release connector at the distal end of the piston: 
wherein the quick release connector is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed,	The quick release connector of the accused product is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed. <i>See videos produced herewith.</i>

wherein the first massaging head has a substantially cylindrical pocket to receive the quick release connector.

The first massaging head of the accused product has a substantially cylindrical pocket to receive the quick release connector:

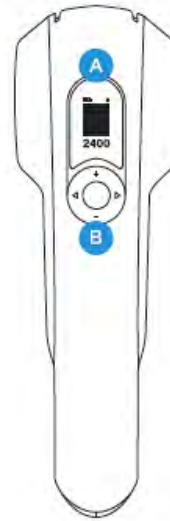


35. The percussive massager of claim 34, further comprising: a second massaging head configured to releasably couple to the distal end of the piston via the quick release connector.	The accused product is sold with a second massaging head that is configured to releasably couple to the distal end of the piston via the quick release connector.  I Percussive Therapy Attachments *Magnetic connection to the device and can be removed by pulling *All the Attachment Rings have only one correct position J Flat *General use for the entire face, neck and chest K Cone *More precise treatment for targeted areas such as around the eyes, nasolabial lines and pressure points L Micropoint *Maximize circulation for larger areas such as the forehead, cheeks and chest Product Overview TheraFace PRO An advanced solution for better facial wellness. The TheraFace PRO is a 4-in-1 handheld device that takes facial wellness to the next level by helping to reduce tension, relax facial muscles, and achieve healthier-looking skin by gently stimulating the face. It includes microcurrent, blue, red, and red+infrared light LED, and cleansing treatments, allowing you to customize your facial therapy in one easy-to-use versatile device. Use the variety of treatment rings to help lift, tone, rejuvenate, and deep clean. The TheraFace PRO is your all-in-one solution for optimal health and wellness for the face.
36. The percussive massager of claim 34, wherein the motor is configured to cause the piston to reciprocate the predetermined stroke length at a second speed.	The motor of the accused product is configured to cause the piston to reciprocate the predetermined stroke length at multiple speeds.  Using the Theragun Elite 1. To turn on, firmly press and hold the center button on the button pad. 2. Press the plus (+) and minus (-) buttons on the button pad to increase or decrease speed. 3. Press the left (<) and right (>) arrows on the button pad to toggle between the pre-loaded treatment presets. 4. To turn off, firmly press and hold the center button on the button pad until the device shuts down. Note: We recommend no more than two minutes of continuous use in any one spot.

37. The percussive massager of claim 36, wherein the first speed and the second speed are each less than or equal to 3600 strokes per minute.

The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are less than or equal to 3600 strokes per minute.

The Theragun Elite

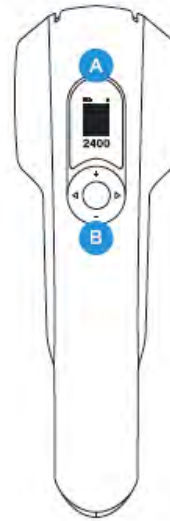


See also videos produced herewith.

38. The percussive massager of claim 36, wherein the first speed and the second speed are each greater than or equal to 600 strokes per minute.

The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are greater than or equal to 600 strokes per minute.

The Theragun Elite



See also videos produced herewith.

40. The percussive massager of claim 36, further comprising: a control panel positioned on an exterior of the housing

The accused product has a control panel on the exterior of the housing.

The Theragun Elite

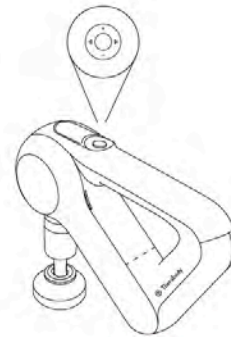


- A OLED screen
- B Button pad

Using the Theragun Elite

1. To turn on, firmly press and hold the center button on the button pad.
2. Press the plus (+) and minus (-) buttons on the button pad to increase or decrease speed.
3. Press the left (<) and right (>) arrows on the button pad to toggle between the pre-loaded treatment presets.
4. To turn off, firmly press and hold the center button on the button pad until the device shuts down.

Note: We recommend no more than two minutes of continuous use in any one spot.



See also videos produced herewith.

41. The percussive massager of claim 40, wherein the control panel is configured to display one or more visual indicators.

The control panel of the accused product displays one or more visual indicators.

The Theragun Elite

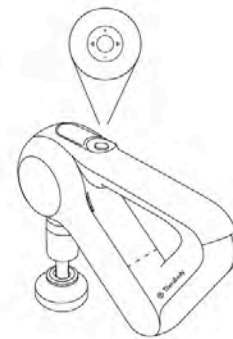


- A OLED screen
- B Button pad

Using the Theragun Elite

1. To turn on, firmly press and hold the center button on the button pad.
2. Press the plus (+) and minus (-) buttons on the button pad to increase or decrease speed.
3. Press the left (<) and right (>) arrows on the button pad to toggle between the pre-loaded treatment presets.
4. To turn off, firmly press and hold the center button on the button pad until the device shuts down.

Note: We recommend no more than two minutes of continuous use in any one spot.



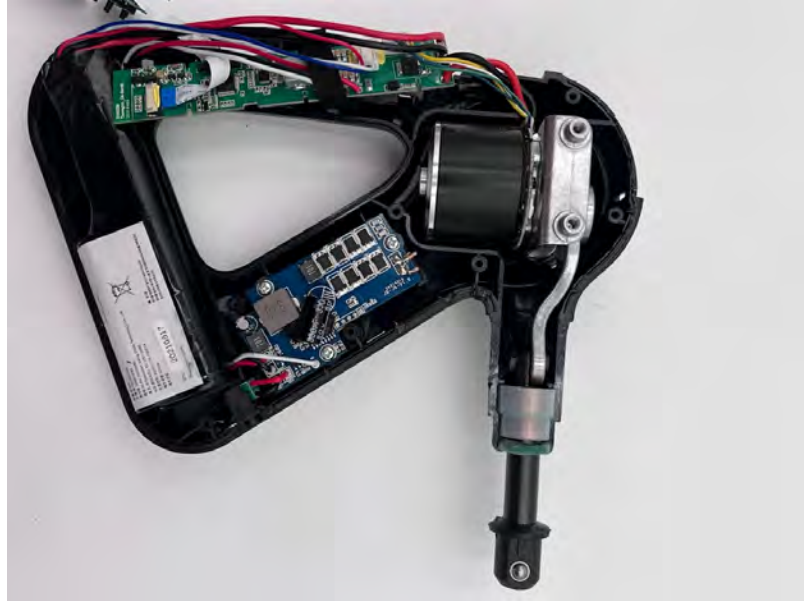
See also videos produced herewith.

43. The percussive massager of claim 40, wherein the control panel has one or more inputs.	The control panel of the accused product has one or more inputs. Using the Theragun Elite 1. To turn on, firmly press and hold the center button on the button pad. 2. Press the plus (+) and minus (-) buttons on the button pad to increase or decrease speed. 3. Press the left (<) and right (>) arrows on the button pad to toggle between the pre-loaded treatment presets. 4. To turn off, firmly press and hold the center button on the button pad until the device shuts down. Note: We recommend no more than two minutes of continuous use in any one spot. <i>See also</i> videos produced herewith.
44. The percussive massager of claim 43, wherein the one or more inputs comprise at least one of: a button, a switch, and a dial.	The control panel of the accused product has an input comprising a button. Using the Theragun Elite 1. To turn on, firmly press and hold the center button on the button pad. 2. Press the plus (+) and minus (-) buttons on the button pad to increase or decrease speed. 3. Press the left (<) and right (>) arrows on the button pad to toggle between the pre-loaded treatment presets. 4. To turn off, firmly press and hold the center button on the button pad until the device shuts down. Note: We recommend no more than two minutes of continuous use in any one spot. <i>See also</i> videos produced herewith.

45. The percussive massager of claim 43, wherein the first speed and the second speed are each selectable via the one or more inputs.	The button on the control panel of the accused product allows speed selection. Using the Theragun Elite 1. To turn on, firmly press and hold the center button on the button pad. 2. Press the plus (+) and minus (-) buttons on the button pad to increase or decrease speed. 3. Press the left (<) and right (>) arrows on the button pad to toggle between the pre-loaded treatment presets. 4. To turn off, firmly press and hold the center button on the button pad until the device shuts down. Note: We recommend no more than two minutes of continuous use in any one spot. The diagram shows the Theragun Elite device, which is a handheld percussive massager. A circular callout points to the control panel located on the top of the device's handle. The control panel features a central button and two side buttons, with a small display or indicator above them. <i>See also videos produced herewith.</i>
46. The percussive massager of claim 43, wherein a first selection of the one or more inputs is configured to cause the percussive massager to power on and wherein a second selection of the one or more inputs is configured to cause the percussive massager to power off.	The button on the control panel of the accused product turns the product on or off. Using the Theragun Elite 1. To turn on, firmly press and hold the center button on the button pad. 2. Press the plus (+) and minus (-) buttons on the button pad to increase or decrease speed. 3. Press the left (<) and right (>) arrows on the button pad to toggle between the pre-loaded treatment presets. 4. To turn off, firmly press and hold the center button on the button pad until the device shuts down. Note: We recommend no more than two minutes of continuous use in any one spot. The diagram shows the Theragun Elite device, which is a handheld percussive massager. A circular callout points to the control panel located on the top of the device's handle. The control panel features a central button and two side buttons, with a small display or indicator above them. <i>See also videos produced herewith.</i>

58. The percussive massager of claim 34, wherein the motor has an output shaft configured to rotate about a rotation axis, and wherein the drive mechanism comprises: a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston.

In the accused product, the motor has an output shaft configured to rotate about a rotation axis, and the drive mechanism comprises a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston:



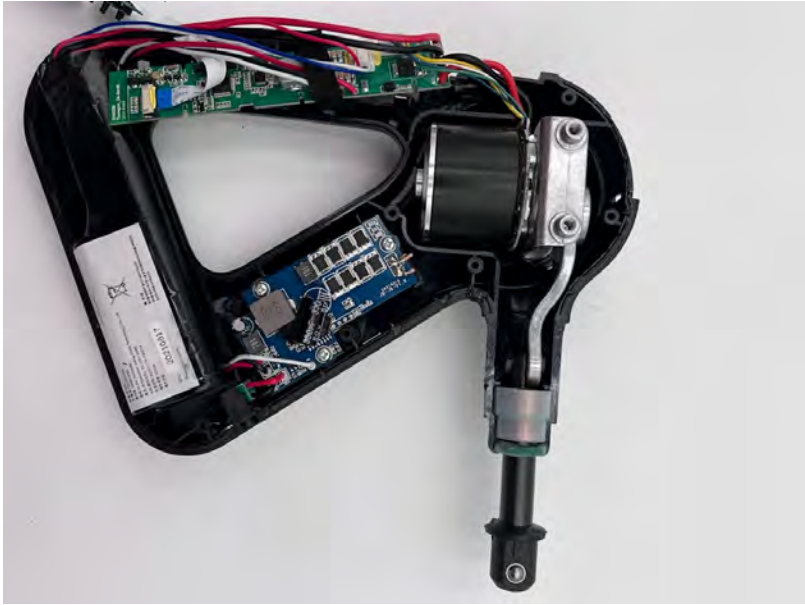
59. The percussive massager of claim 58, wherein an offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston.	In the accused product, the offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston: 
60. The percussive massager of claim 59, wherein the motor is directly connected to the flywheel, and wherein the crank pin is directly connected to the flywheel.	In the accused product, the motor is directly connected to the flywheel, and the crank pin is directly connected to the flywheel. 

EXHIBIT 3

Claim Chart – U.S. Patent No. 11,857,482 – Theragun Mini

U.S. Patent No. 11,857,482	<u>Theragun Mini</u>
34. A percussive massager comprising:	The accused product is a percussive massager: 

THERAGUN mini

Small, Quiet, Packed with Power.

Theragun mini is our smallest, lightest, most portable massage device yet. It's packed with power so you can get quality treatment on-the-go. For more personalization, use the 3 attachments and pair with the Therabody app via Bluetooth® to get customized wellness routines. And with the convenience of easy USB-C charging, this is everything you want in a warm-up, recovery, and anytime device.

- 3 speeds (1750, 2100, 2400 PPMs)
- LED speed indicator
- USB-C charging port
- 12 mm amplitude
- Easy-to-clean non-porous closed-cell foam attachments
- Proprietary brushless motor with QuietForce Technology
- Ergonomic grip
- Internal lithium-ion battery (80 minutes)
- More portable (1 lb, 5.55 in x 4.92 in x 1.93 in)



Download on the
App Store

GET IT ON
Google Play

It all starts with the Therabody app where you'll find quick and easy personalized routines.



Made in China



WARNING: Cancer and Reproductive Harm — www.P65Warnings.ca.gov

©2022 Therabody, Inc. All Rights Reserved.

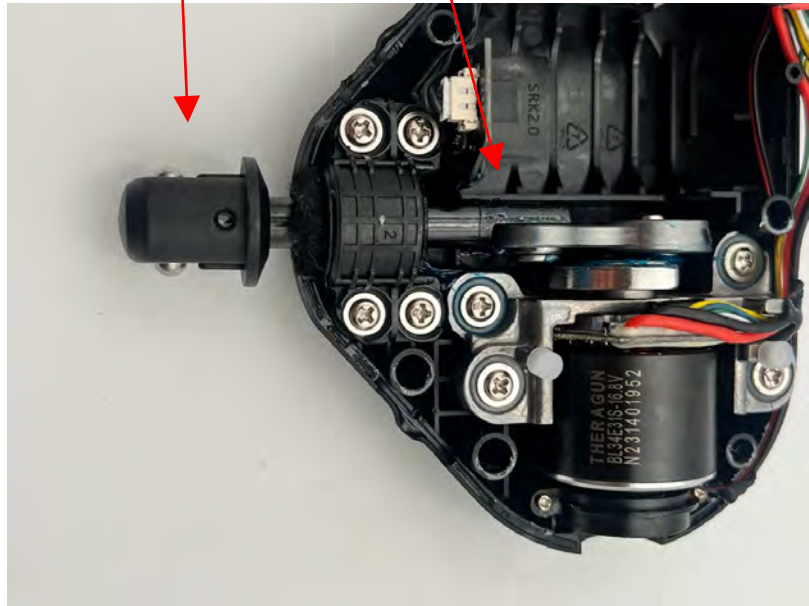
a housing;

The accused product has a housing:



a piston in the housing having a proximal end and a distal end,

The accused product has a piston in the housing with a proximal end and a distal end. The proximal end of the piston is operatively connected to the drive mechanism, which includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc.:



a motor at least partially within the housing

The accused product has a **motor** at least partially within the housing:



and operatively connected to the proximal end of the piston,	In the accused product, the motor is operatively connected to the proximal end of the piston by several structures including the motor shaft, flywheel, a crank pin, a connecting rod, etc.: 
---	---

wherein the motor is configured to cause the piston to reciprocate at a first speed;	In the accused product, the motor is configured to cause the piston to reciprocate at a first speed. <i>See videos produced herewith.</i>
---	---

a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston; and

The accused product has a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston. The drive mechanism includes the includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc. The stroke length depends on the amount of offset between the centerline of the flywheel and the crank pin.



a quick release connector at the distal end of the piston,	The accused product has a quick release connector at the distal end of the piston: 
wherein the quick release connector is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed,	The quick release connector of the accused product is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed. <i>See videos produced herewith.</i>

wherein the first
massaging head has a
substantially cylindrical
pocket to receive the
quick release connector.

The first massaging head of the accused product has a substantially
cylindrical pocket to receive the quick release connector:

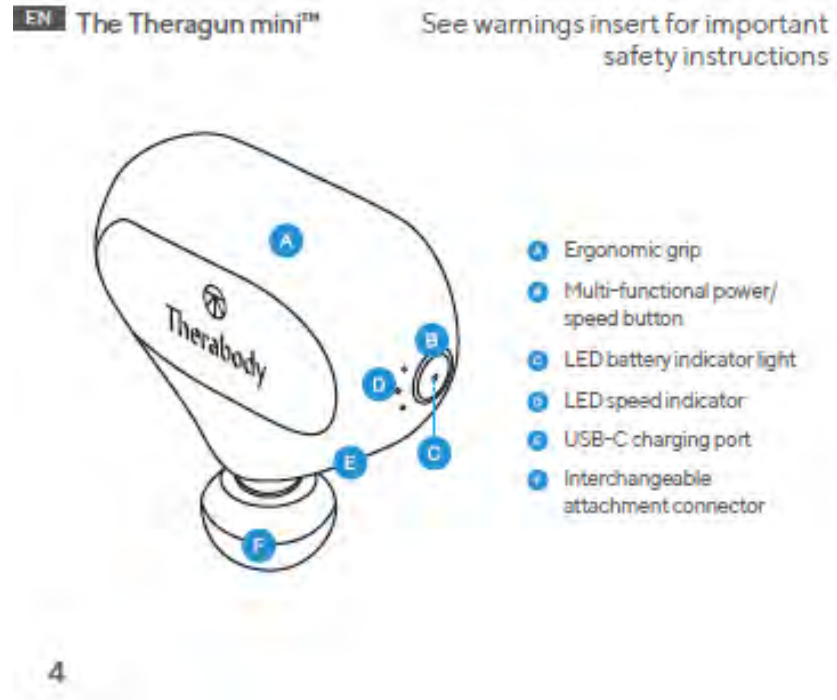


35. The percussive massager of claim 34, further comprising: a second massaging head configured to releasably couple to the distal end of the piston via the quick release connector.	The accused product is sold with a second massaging head that is configured to releasably couple to the distal end of the piston via the quick release connector. Attachments Your Theragun mini comes with 3 attachments designed for a more customized treatment. • Made of comfortable closed-cell PU foam • Easy to clean for a hygienic experience • Won't absorb sweat, lotions, or oils  Standard Ball A more targeted option for overall use. The Standard Ball attachment is specifically designed for overall use on both large and small muscle groups. With a smaller shape and higher impact level than the Dampener, it is a more targeted option for overall use and is your go-to attachment during a workout.  Dampener For tender or bony areas and overall use. The Dampener attachment is specifically designed for general use and low impact treatment around tender or bony areas. Its wide base maximizes surface area for greater, more efficient contact with the body.  Thumb For trigger points and the lower back. Specifically designed to mimic an actual human thumb, the Thumb attachment is perfect for trigger point therapy and use on the lower back. Use the Thumb anywhere you might have used an actual thumb and get the treatment you need without needing to leave the comfort of home. <i>See also videos produced herewith.</i>
36. The percussive massager of claim 34, wherein the motor is configured to cause the piston to reciprocate the predetermined stroke length at a second speed.	The motor of the accused product is configured to cause the piston to reciprocate the predetermined stroke length at multiple speeds. 1. To turn on the Theragun mini, firmly press and hold the multi-functional power/speed button on the right side of the device. 2. Float the device across areas in need of treatment, gradually applying light to moderate pressure as needed. 3. Press the power/speed button again to toggle between 3 speeds. 4. To turn off the Theragun mini, firmly press and hold the power/speed button until the device shuts off. Connecting the attachments 1. Ensure that your device is powered off before connecting or removing any attachments. 2. Align the attachment with the tip of the arm and push to connect. 3. To remove the attachment, hold the top of the device with one hand, and the attachment with the other hand. Place one finger on each side of the plastic connector and firmly pull off the attachment. Warning: Do not place your finger between the attachment  

37. The percussive massager of claim 36, wherein the first speed and the second speed are each less than or equal to 3600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are less than or equal to 3600 strokes per minute. <i>See videos produced herewith.</i>
38. The percussive massager of claim 36, wherein the first speed and the second speed are each greater than or equal to 600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are greater than or equal to 600 strokes per minute. <i>See videos produced herewith.</i>
40. The percussive massager of claim 36, further comprising: a control panel positioned on an exterior of the housing	The accused product has a control panel on the exterior of the housing. EN The Theragun mini™ See warnings insert for important safety instructions  - A Ergonomic grip - B Multi-functional power/speed button - C LED battery indicator light - D LED speed indicator - E USB-C charging port - F Interchangeable attachment connector 4 <i>See also videos produced herewith.</i>

41. The percussive massager of claim 40, wherein the control panel is configured to display one or more visual indicators.

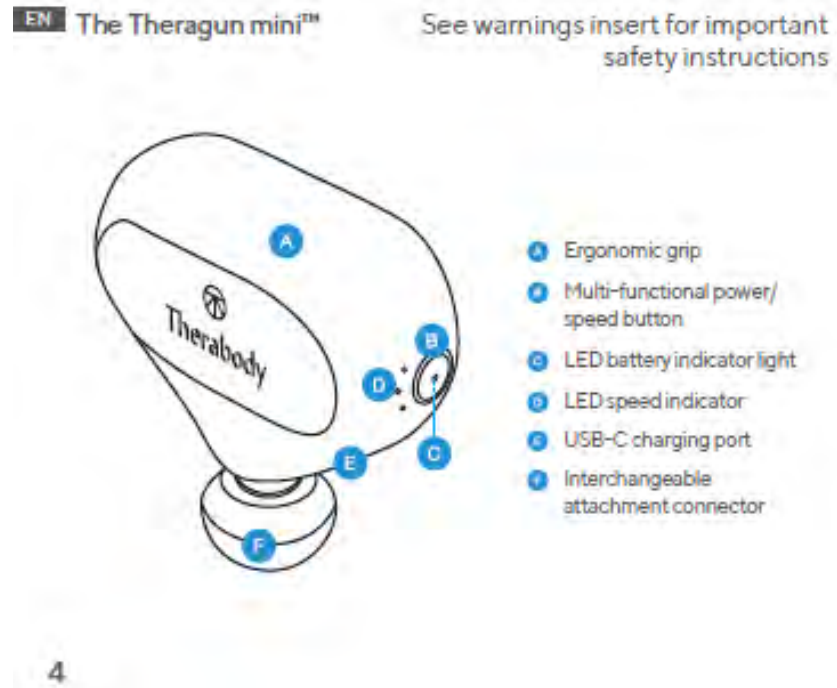
The control panel of the accused product displays one or more visual indicators.



See also videos produced herewith.

43. The percussive massager of claim 40, wherein the control panel has one or more inputs.

The control panel of the accused product has one or more inputs.



See also videos produced herewith.

44. The percussive massager of claim 43, wherein the one or more inputs comprise at least one of: a button, a switch, and a dial.

The control panel of the accused product has an input comprising a button.

EN The Theragun mini™ See warnings insert for important safety instructions



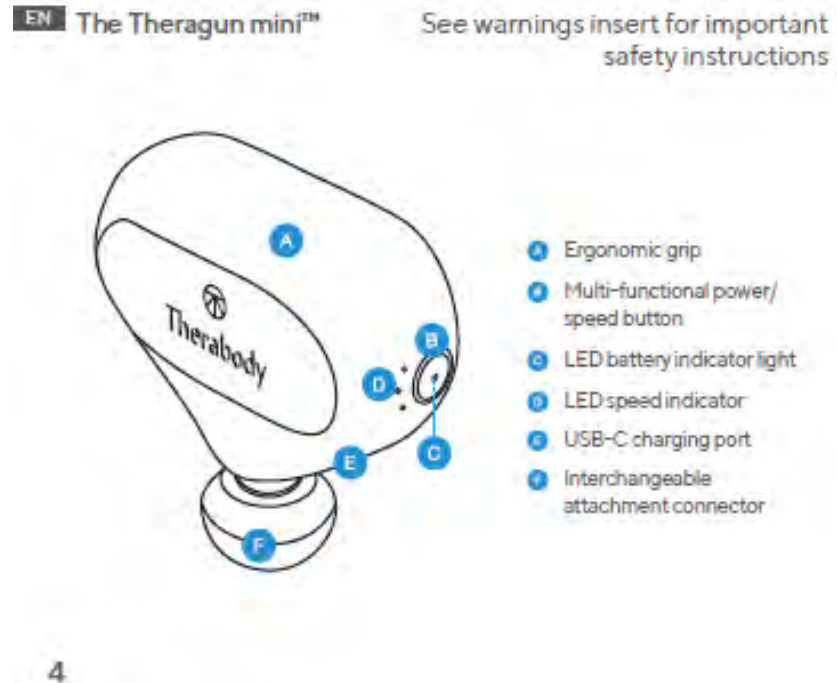
- A Ergonomic grip
- B Multi-functional power/speed button
- C LED battery indicator light
- D LED speed indicator
- E USB-C charging port
- F Interchangeable attachment connector

4

See also videos produced herewith.

45. The percussive massager of claim 43, wherein the first speed and the second speed are each selectable via the one or more inputs.

The button on the control panel of the accused product allows speed selection.



See also videos produced herewith.

46. The percussive massager of claim 43, wherein a first selection of the one or more inputs is configured to cause the percussive massager to power on and wherein a second selection of the one or more inputs is configured to cause the percussive massager to power off.

The button on the control panel of the accused product turns the product on or off.

Using the Theragun mini

EN

1. To turn on the Theragun mini, firmly press and hold the multi-functional power/speed button on the right side of the device.
2. Float the device across areas in need of treatment, gradually applying light to moderate pressure as needed.
3. Press the power/speed button again to toggle between 3 speeds.
4. To turn off the Theragun mini, firmly press and hold the power/speed button until the device shuts off.

Connecting the attachments

1. Ensure that your device is powered off before connecting or removing any attachments.
2. Align the attachment with the tip of the arm and push to connect.
3. To remove the attachment, hold the top of the device with one hand, and the attachment with the other hand. Place one finger on each side of the plastic connector and firmly pull off the attachment.

Warning: Do not place your finger between the attachment and the end of the arm, as this may cause pinching or injury.



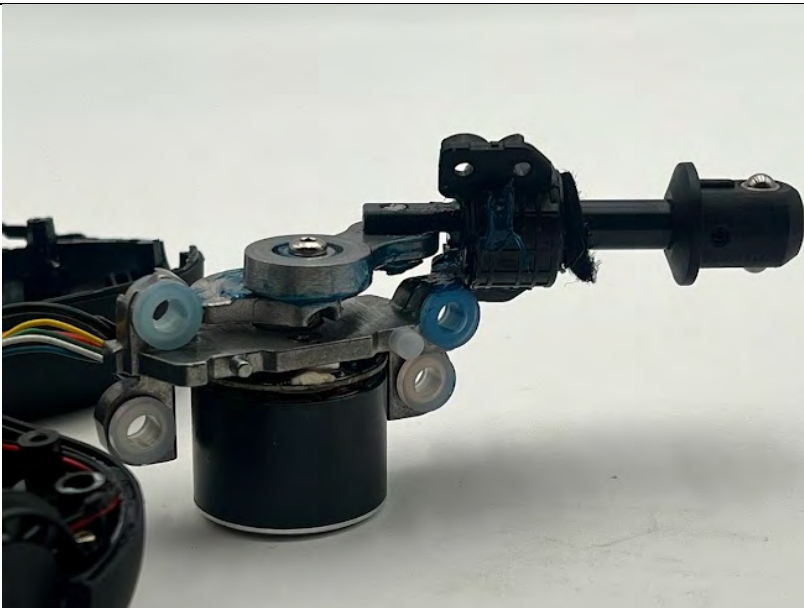
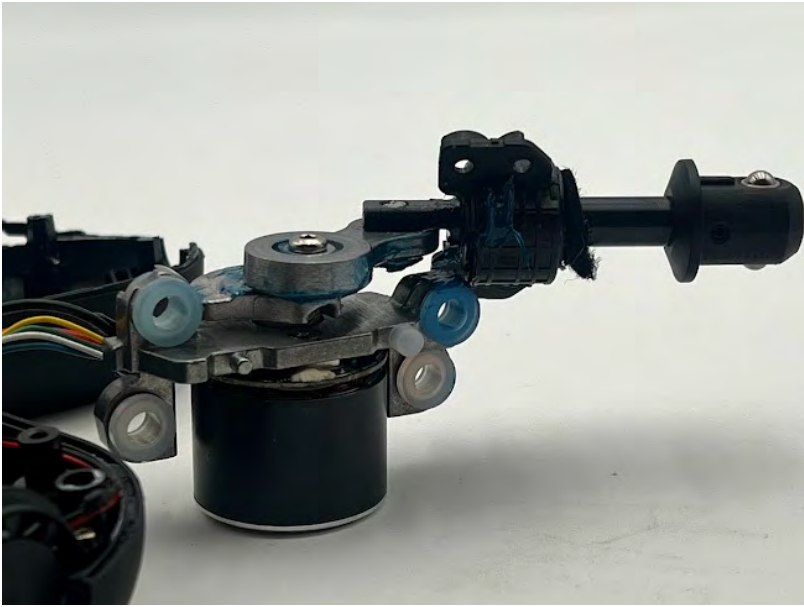
5

See also videos produced herewith.

58. The percussive massager of claim 34, wherein the motor has an output shaft configured to rotate about a rotation axis, and wherein the drive mechanism comprises:
a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston.

In the accused product, the motor has an output shaft configured to rotate about a rotation axis, and the drive mechanism comprises a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston:



	
59. The percussive massager of claim 58, wherein an offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston.	In the accused product, the offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston: 

60. The percussive massager of claim 59, wherein the motor is directly connected to the flywheel, and wherein the crank pin is directly connected to the flywheel.

In the accused product, the motor is directly connected to the flywheel, and the crank pin is directly connected to the flywheel.





EXHIBIT 4

Claim Chart – U.S. Patent No. 11,857,482 – Theragun Prime

U.S. Patent No. 11,857,482	<u>Theragun Prime</u>
34. A percussive massager comprising:	The accused product is a percussive massager: The image shows the front of the Theragun Prime product box. It is dark blue with a large circular cutout on the left showing the black massager. Text on the box includes 'THERAGUN PRIME' in orange, 'Relieve Pain', 'Reduce Tightness', 'Accelerate Recovery', 'Improve Circulation' in white, and 'SCIENTIFICALLY PROVEN BENEFITS' in small white text. At the bottom left is the Therabody logo and a 'PERFORMANCE' badge. At the bottom right, it lists features: 'Deep Muscle Percussive Massage', 'Patented Ergonomic Grip', '4 Massage Attachments', '5 Speeds', 'App Guided Routines', and 'US FDA Registered'. The image shows the back of the Theragun Prime product box. It features a circular cutout on the left showing a person using the massager. Text on the right lists benefits: 'LED indicators to manage massage speed', 'Patented ergonomic grip for better reach and maximum leverage', 'Scientifically designed attachments to target different areas', 'Our strongest, deepest percussive massage therapy at 16mm', and 'Scientifically proven benefits'. Below this is the slogan 'Deep, powerful massage in a simple, easy to use design.' At the bottom, there are five icons with descriptions: 'Dampener: Reduce aches and pains for tender or sensitive areas', 'Standard Ball: Use for all-over body massage to reduce tension', 'Thumb: Use on the lower back and trigger points to ease painful knots', 'Micro-point: Increase circulation and stimulate recovery', and 'Bluetooth connectivity'.

The accused product has a housing:

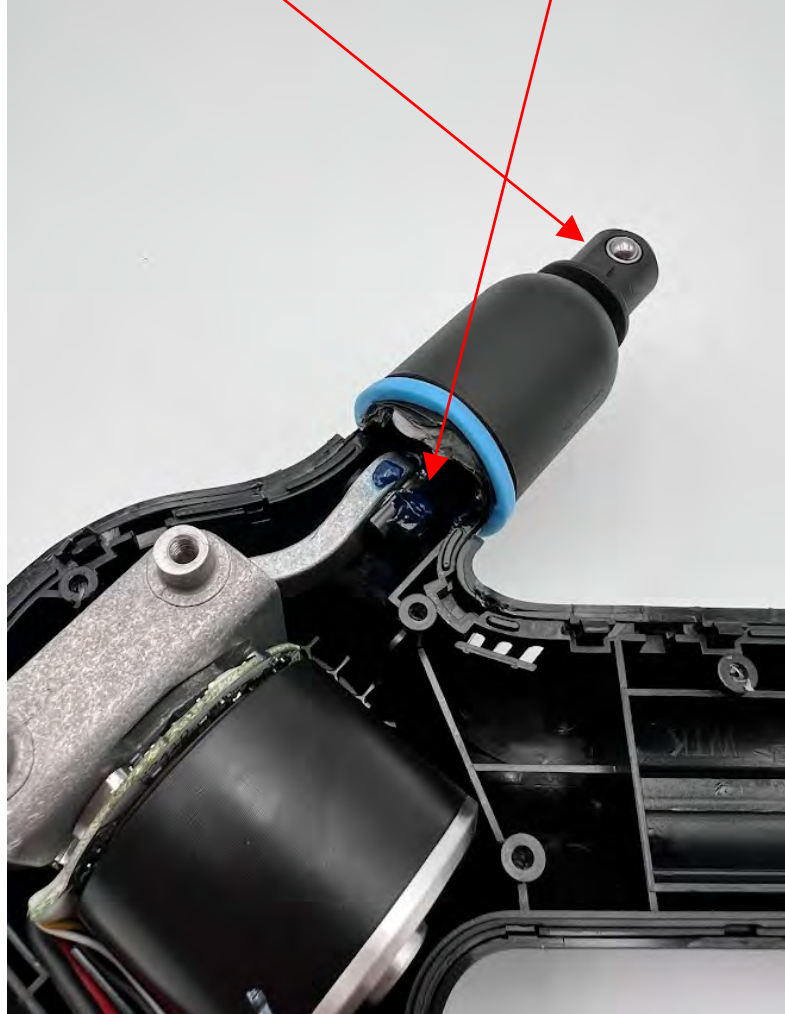


a housing;



a piston in the housing having a proximal end and a distal end,

The accused product has a piston in the housing with a proximal end and a distal end. The proximal end of the piston is operatively connected to the drive mechanism, which includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc.:



a motor at least partially within the housing

The accused product has a **motor** at least partially within the housing:

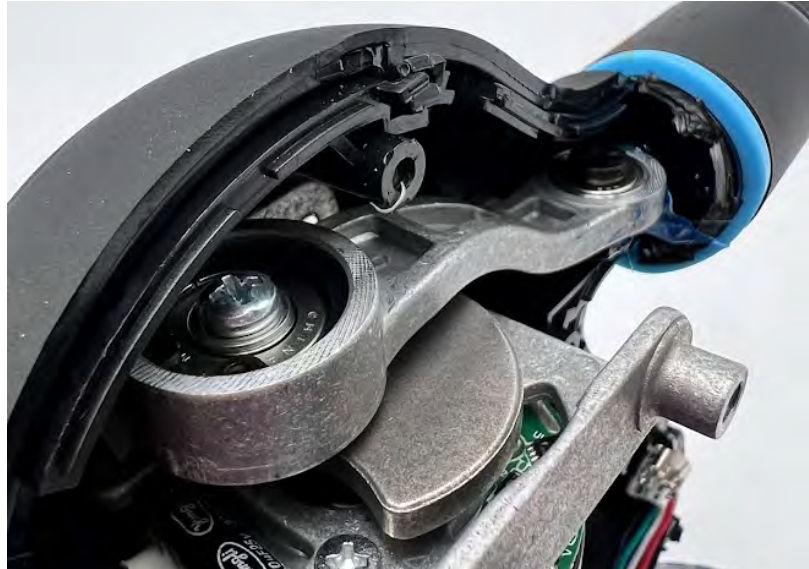


and operatively connected to the proximal end of the piston,	In the accused product, the motor is operatively connected to the proximal end of the piston by several structures including the motor shaft, flywheel, a crank pin, a connecting rod, etc.: 
---	---

wherein the motor is configured to cause the piston to reciprocate at a first speed;	In the accused product, the motor is configured to cause the piston to reciprocate at a first speed. <i>See videos produced herewith.</i>
---	---

a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston; and

The accused product has a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston. The drive mechanism includes the includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc. The stroke length depends on the amount of offset between the centerline of the flywheel and the crank pin.



a quick release connector at the distal end of the piston,	The accused product has a quick release connector at the distal end of the piston: 
wherein the quick release connector is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed,	The quick release connector of the accused product is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed. <i>See videos produced herewith.</i>

wherein the first massaging head has a substantially cylindrical pocket to receive the quick release connector.

The first massaging head of the accused product has a substantially cylindrical pocket to receive the quick release connector:



35. The percussive massager of claim 34, further comprising: a second massaging head configured to releasably couple to the distal end of the piston via the quick release connector.

The accused product is sold with a second massaging head that is configured to releasably couple to the distal end of the piston via the quick release connector.



See also videos produced herewith.

36. The percussive massager of claim 34, wherein the motor is configured to cause the piston to reciprocate the predetermined stroke length at a second speed.

The motor of the accused product is configured to cause the piston to reciprocate the predetermined stroke length at multiple speeds.

Using the Theragun Prime

1. To turn on, firmly press and hold the center button on the button pad.
2. Press the up (▲) and down (▼) buttons on the button pad to increase or decrease speed.
3. To turn off, firmly press and hold the center button on the button pad until the device shuts down.

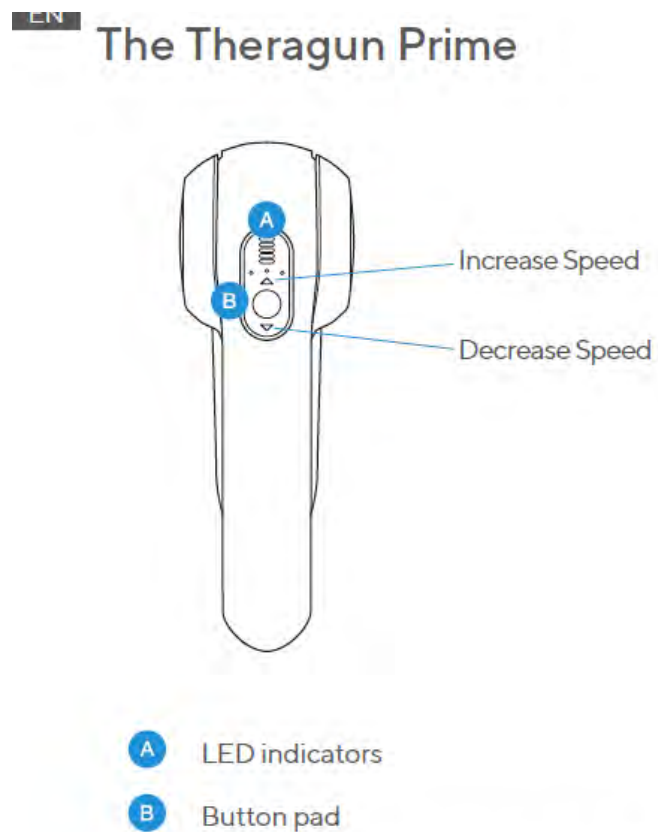
Note: We recommend no more than two minutes of continuous use in any one spot.



37. The percussive massager of claim 36, wherein the first speed and the second speed are each less than or equal to 3600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are less than or equal to 3600 strokes per minute. <i>See videos produced herewith.</i>
38. The percussive massager of claim 36, wherein the first speed and the second speed are each greater than or equal to 600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are greater than or equal to 600 strokes per minute. <i>See videos produced herewith.</i>
40. The percussive massager of claim 36, further comprising: a control panel positioned on an exterior of the housing	The accused product has a control panel on the exterior of the housing. Using the Theragun Prime 1. To turn on, firmly press and hold the center button on the button pad. 2. Press the up (▲) and down (▼) buttons on the button pad to increase or decrease speed. 3. To turn off, firmly press and hold the center button on the button pad until the device shuts down. Note: We recommend no more than two minutes of continuous use in any one spot.  <i>See also videos produced herewith.</i>

41. The percussive massager of claim 40, wherein the control panel is configured to display one or more visual indicators.

The control panel of the accused product displays one or more visual indicators.



See also videos produced herewith.

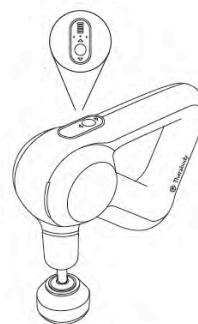
43. The percussive massager of claim 40, wherein the control panel has one or more inputs.

The control panel of the accused product has one or more inputs.

Using the Theragun Prime

1. To turn on, firmly press and hold the center button on the button pad.
2. Press the up (▲) and down (▼) buttons on the button pad to increase or decrease speed.
3. To turn off, firmly press and hold the center button on the button pad until the device shuts down.

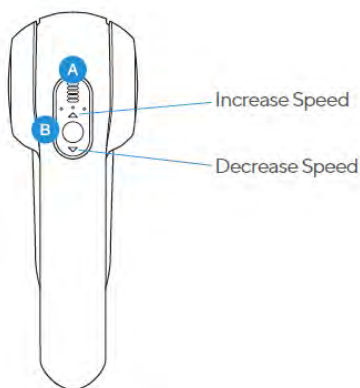
Note: We recommend no more than two minutes of continuous use in any one spot.



EN

EN

The Theragun Prime



A LED indicators

B Button pad

See also videos produced herewith.

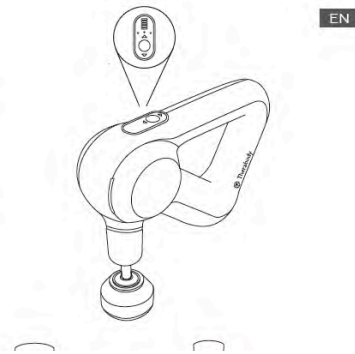
44. The percussive massager of claim 43, wherein the one or more inputs comprise at least one of: a button, a switch, and a dial.

The control panel of the accused product has an input comprising a button.

Using the Theragun Prime

1. To turn on, firmly press and hold the center button on the button pad.
2. Press the up (**▲**) and down (**▼**) buttons on the button pad to increase or decrease speed.
3. To turn off, firmly press and hold the center button on the button pad until the device shuts down.

Note: We recommend no more than two minutes of continuous use in any one spot.



See also videos produced herewith.

45. The percussive massager of claim 43, wherein the first speed and the second speed are each selectable via the one or more inputs.

The button on the control panel of the accused product allows speed selection.

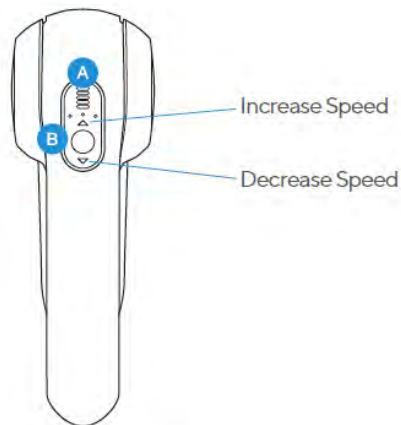
Using the Theragun Prime

1. To turn on, firmly press and hold the center button on the button pad.
2. Press the up (A) and down (V) buttons on the button pad to increase or decrease speed.
3. To turn off, firmly press and hold the center button on the button pad until the device shuts down.

Note: We recommend no more than two minutes of continuous use in any one spot.



EN The Theragun Prime



- A LED indicators
- B Button pad

See also videos produced herewith.

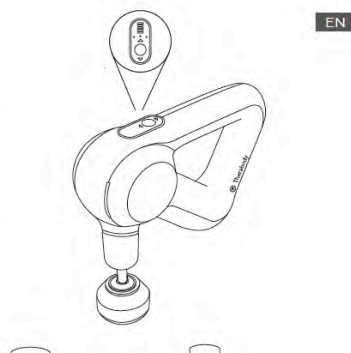
46. The percussive massager of claim 43, wherein a first selection of the one or more inputs is configured to cause the percussive massager to power on and wherein a second selection of the one or more inputs is configured to cause the percussive massager to power off.

The button on the control panel of the accused product turns the product on or off.

Using the Theragun Prime

1. To turn on, firmly press and hold the center button on the button pad.
2. Press the up (▲) and down (▼) buttons on the button pad to increase or decrease speed.
3. To turn off, firmly press and hold the center button on the button pad until the device shuts down.

Note: We recommend no more than two minutes of continuous use in any one spot.



See also videos produced herewith.

58. The percussive massager of claim 34, wherein the motor has an output shaft configured to rotate about a rotation axis, and wherein the drive mechanism comprises: a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston.

In the accused product, the motor has an output shaft configured to rotate about a rotation axis, and the drive mechanism comprises a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston:



59. The percussive massager of claim 58, wherein an offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston.

In the accused product, the offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston:



60. The percussive massager of claim 59, wherein the motor is directly connected to the flywheel, and wherein the crank pin is directly connected to the flywheel.

In the accused product, the motor is directly connected to the flywheel, and the crank pin is directly connected to the flywheel.



EXHIBIT 5

Claim Chart – U.S. Patent No. 11,857,482 – TheraFace PRO and PRO LED Edition¹

U.S. Patent No. 11,857,482	<u>TheraFace PRO</u>
34. A percussive massager comprising:	The accused product is a percussive massager:  

¹ The TheraFace PRO is also sold as TheraFace PRO LED Edition. Both are identical for purposes of infringement with respect to the '482 Patent.

Intended Use

The TheraFace PRO is intended to help reduce tension, relax facial muscles, and achieve more beautiful skin by gently stimulating the face. The variety of treatment rings are intended to help lift, tone, rejuvenate, and deep clean.

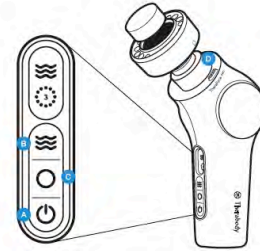
Percussive Therapy

Percussive therapy, now optimized for the face. Facial massage to reduce tension and relax facial muscles.



Getting To Know Your TheraFace PRO Device

- A Power Button**
* Powers the device ON / OFF
- B Percussive Therapy Button**
* Controls the Percussive Attachment
- C Ring Button**
* Controls the Attachment Ring
- D Attachment Ring**
* Magnetic connection to the device and can be removed by pulling
* All the Attachment Rings have only one correct position



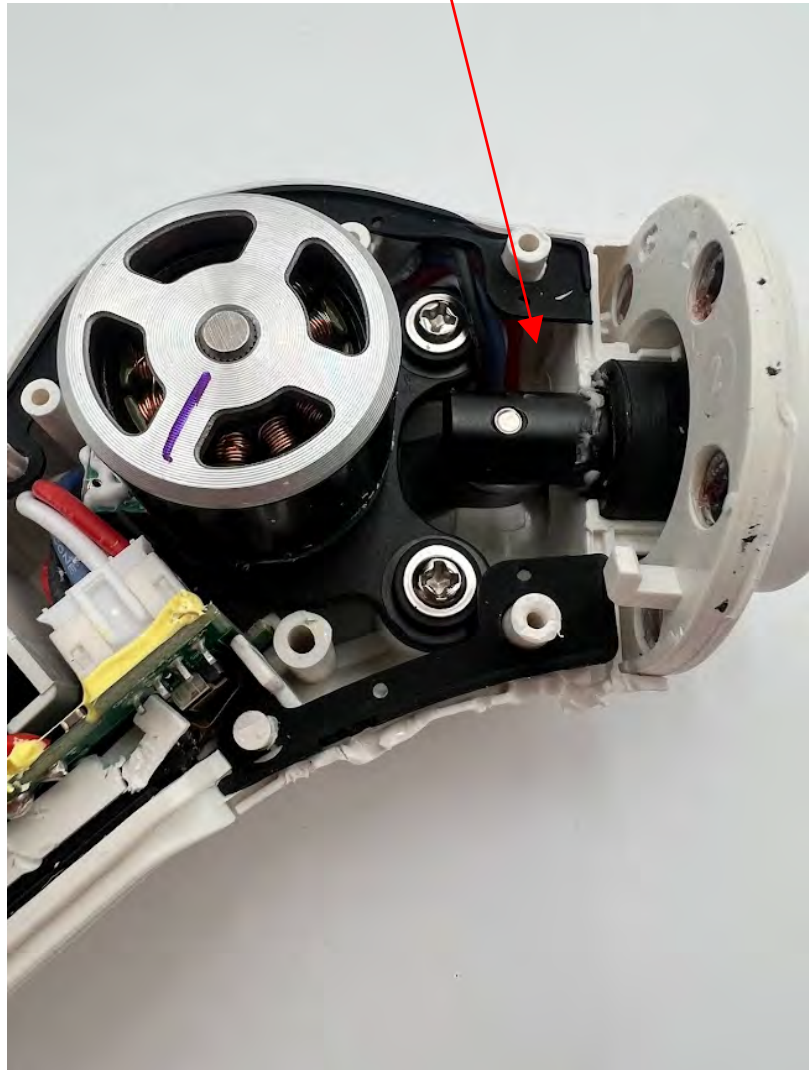
a housing;

The accused product has a housing:

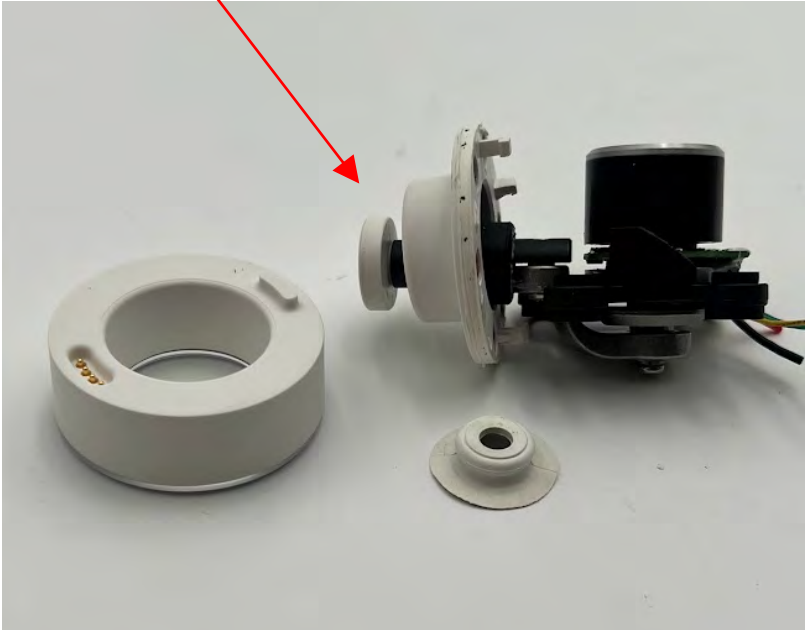


a piston in the housing having a proximal end and a distal end,

The accused product has a piston in the housing with a proximal end and a distal end. The proximal end of the piston is operatively connected to the drive mechanism, which includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc.:



The distal end of the piston:



a motor at least partially within the housing

The accused product has a **motor** at least partially within the housing:



and operatively connected to the proximal end of the piston,	In the accused product, the motor is operatively connected to the proximal end of the piston by several structures including the motor shaft, flywheel, a crank pin, a connecting rod, etc.: 
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wherein the motor is configured to cause the piston to reciprocate at a first speed;	In the accused product, the motor is configured to cause the piston to reciprocate at a first speed. <i>See videos produced herewith.</i>
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a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston; and

The accused product has a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston. The drive mechanism includes the includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc. The stroke length depends on the amount of offset between the centerline of the flywheel and the crank pin.

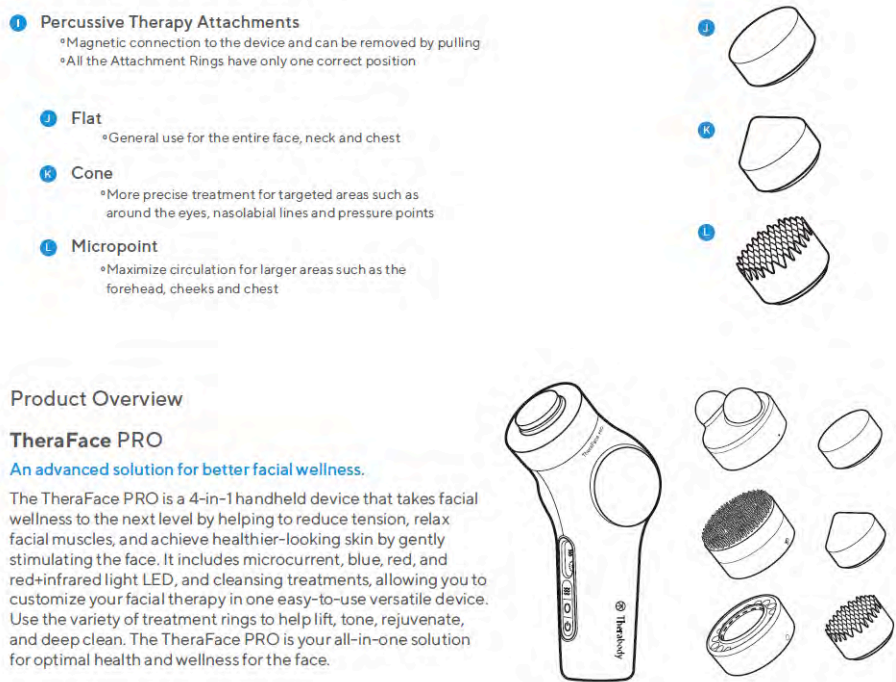


a quick release connector at the distal end of the piston,	The accused product has a quick release connector at the distal end of the piston, using a magnet to attach the massaging head. 
wherein the quick release connector is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed,	The quick release connector of the accused product is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed. <i>See videos produced herewith.</i>

wherein the first
massaging head has
a substantially
cylindrical pocket to
receive the quick
release connector.

The first massaging head of the accused product has a substantially cylindrical pocket to receive the quick release connector:



35. The percussive massager of claim 34, further comprising: a second massaging head configured to releasably couple to the distal end of the piston via the quick release connector.	The accused product is sold with a second massaging head that is configured to releasably couple to the distal end of the piston via the quick release connector.  Percussive Therapy Attachments I Flat *Magnetic connection to the device and can be removed by pulling *All the Attachment Rings have only one correct position J Flat *General use for the entire face, neck and chest K Cone *More precise treatment for targeted areas such as around the eyes, nasolabial lines and pressure points L Micropoint *Maximize circulation for larger areas such as the forehead, cheeks and chest Product Overview TheraFace PRO An advanced solution for better facial wellness. The TheraFace PRO is a 4-in-1 handheld device that takes facial wellness to the next level by helping to reduce tension, relax facial muscles, and achieve healthier-looking skin by gently stimulating the face. It includes microcurrent, blue, red, and red-infrared light LED, and cleansing treatments, allowing you to customize your facial therapy in one easy-to-use versatile device. Use the variety of treatment rings to help lift, tone, rejuvenate, and deep clean. The TheraFace PRO is your all-in-one solution for optimal health and wellness for the face.
36. The percussive massager of claim 34, wherein the motor is configured to cause the piston to reciprocate the predetermined stroke length at a second speed.	The motor of the accused product is configured to cause the piston to reciprocate the predetermined stroke length at multiple speeds. Using the TheraFace PRO Start by washing your face completely and rinse twice to remove residue. Allow skin to dry completely before starting treatment. Be sure to visit therabody.com for treatment protocols and instructional videos. Note: The TheraFace PRO device will make a beeping sound every 15 seconds. This will help you track the time within each treatment and will also inform you if a treatment has been disconnected or is completed. • 1 beep = timed feedback every 15 sec so you can time their protocols better • 2 beeps = the LED, Microcurrent, Hot, or Cold treatment has been accidentally disconnected • 3 beeps = the LED, Microcurrent, Hot, or Cold treatment is over A. Percussive Therapy Feature 1. Select and attach the desired percussive therapy attachment 2. Once attached to the TheraFace PRO, turn ON the TheraFace PRO device by pressing the Power Button for 2 seconds. 3. Turn on the percussive feature by pressing the percussive button once. 4. To toggle between the 3 speed options (1750, 2100 and 2400 rpm), press the percussive button again. 5. To stop the percussive treatment, press the percussive button a third time. Note: • Can be combined with the Cold Ring* - (*Hot and Cold Rings sold separately) • Cannot be combined with the Microcurrent Ring, Hot Ring, LED Rings and Cleansing Ring

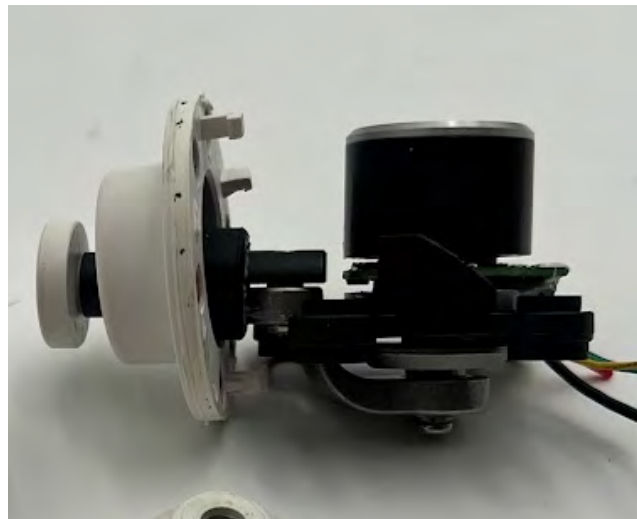
37. The percussive massager of claim 36, wherein the first speed and the second speed are each less than or equal to 3600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are less than or equal to 3600 strokes per minute. <i>See videos produced herewith.</i>
38. The percussive massager of claim 36, wherein the first speed and the second speed are each greater than or equal to 600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are greater than or equal to 600 strokes per minute. <i>See videos produced herewith.</i>
40. The percussive massager of claim 36, further comprising: a control panel positioned on an exterior of the housing	The accused product has a control panel on the exterior of the housing. Getting To Know Your TheraFace PRO Device A Power Button * Powers the device ON / OFF B Percussive Therapy Button * Controls the Percussive Attachment C Ring Button * Controls the Attachment Ring D Attachment Ring * Magnetic connection to the device and can be removed by pulling * All the Attachment Rings have only one correct position 
41. The percussive massager of claim 40, wherein the control panel is configured to display one or more visual indicators.	The control panel of the accused product displays one or more visual indicators. Getting To Know Your TheraFace PRO Device A Power Button * Powers the device ON / OFF B Percussive Therapy Button * Controls the Percussive Attachment C Ring Button * Controls the Attachment Ring D Attachment Ring * Magnetic connection to the device and can be removed by pulling * All the Attachment Rings have only one correct position 

43. The percussive massager of claim 40, wherein the control panel has one or more inputs.	The control panel of the accused product has one or more inputs. Getting To Know Your TheraFace PRO Device A Power Button * Powers the device ON / OFF B Percussive Therapy Button * Controls the Percussive Attachment C Ring Button * Controls the Attachment Ring D Attachment Ring * Magnetic connection to the device and can be removed by pulling * All the Attachment Rings have only one correct position 6
44. The percussive massager of claim 43, wherein the one or more inputs comprise at least one of: a button, a switch, and a dial.	The control panel of the accused product has an input comprising a button. Getting To Know Your TheraFace PRO Device A Power Button * Powers the device ON / OFF B Percussive Therapy Button * Controls the Percussive Attachment C Ring Button * Controls the Attachment Ring D Attachment Ring * Magnetic connection to the device and can be removed by pulling * All the Attachment Rings have only one correct position 6

45. The percussive massager of claim 43, wherein the first speed and the second speed are each selectable via the one or more inputs.	The button on the control panel of the accused product allows speed selection. Using the TheraFace PRO Start by washing your face completely and rinse twice to remove residue. Allow skin to dry completely before starting treatment. Be sure to visit therabody.com for treatment protocols and instructional videos. Note: The TheraFace PRO device will make a beeping sound every 15 seconds. This will help you track the time within each treatment and will also inform you if a treatment has been disconnected or is completed. • 1 beep = timed feedback every 15 sec so you can time their protocols better • 2 beeps = the LED, Microcurrent, Hot, or Cold treatment has been accidentally disconnected • 3 beeps = the LED, Microcurrent, Hot, or Cold treatment is over A. Percussive Therapy Feature 1. Select and attach the desired percussive therapy attachment 2. Once attached to the TheraFace PRO, turn ON the TheraFace PRO device by pressing the Power Button for 2 seconds. 3. Turn on the percussive feature by pressing the percussive button once. 4. To toggle between the 3 speed options (1750, 2100 and 2400 rpm), press the percussive button again. 5. To stop the percussive treatment, press the percussive button a third time. Note: • Can be combined with the Cold Ring* - (*Hot and Cold Rings sold separately) • Cannot be combined with the Microcurrent Ring, Hot Ring, LED Rings and Cleansing Ring Getting To Know Your TheraFace PRO Device A Power Button * Powers the device ON / OFF B Percussive Therapy Button * Controls the Percussive Attachment C Ring Button * Controls the Attachment Ring D Attachment Ring * Magnetic connection to the device and can be removed by pulling * All the Attachment Rings have only one correct position 
46. The percussive massager of claim 43, wherein a first selection of the one or more inputs is configured to cause the percussive massager to power on and wherein a second selection of the one or more inputs is configured to cause the percussive massager to power off.	The button on the control panel of the accused product turns the product on or off. Getting To Know Your TheraFace PRO Device A Power Button * Powers the device ON / OFF B Percussive Therapy Button * Controls the Percussive Attachment C Ring Button * Controls the Attachment Ring D Attachment Ring * Magnetic connection to the device and can be removed by pulling * All the Attachment Rings have only one correct position 

58. The percussive massager of claim 34, wherein the motor has an output shaft configured to rotate about a rotation axis, and wherein the drive mechanism comprises: a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston.

In the accused product, the motor has an output shaft configured to rotate about a rotation axis, and the drive mechanism comprises a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston:



59. The percussive massager of claim 58, wherein an offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston.

In the accused product, the offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston:



60. The percussive massager of claim 59, wherein the motor is directly connected to the flywheel, and wherein the crank pin is directly connected to the flywheel.

In the accused product, the motor is directly connected to the flywheel, and the crank pin is directly connected to the flywheel.

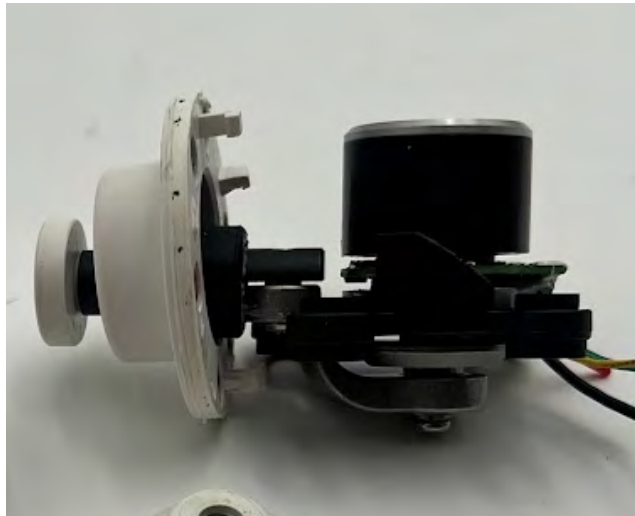


EXHIBIT 6

Claim Chart – U.S. Patent No. 11,857,482 – Theragun Relief

U.S. Patent No. 11,857,482	<u>Theragun Relief</u>
34. A percussive massager comprising:	The accused product is a percussive massager:  

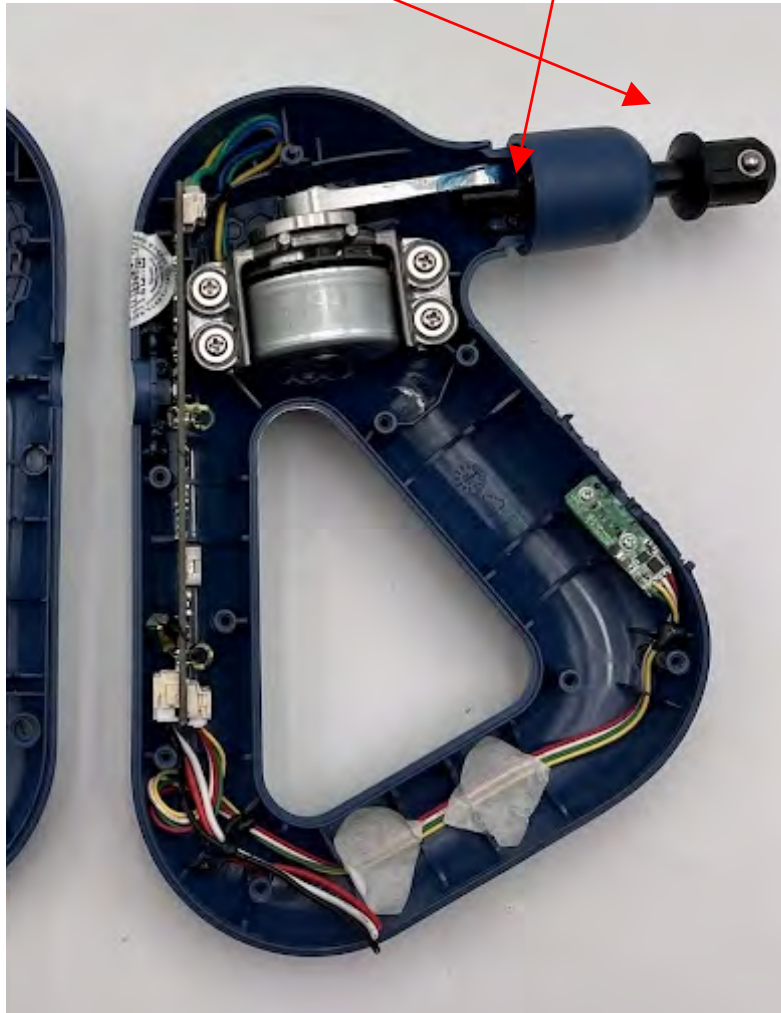
a housing;

The accused product has a housing:



a piston in the housing having a proximal end and a distal end,

The accused product has a piston in the housing with a proximal end and a distal end. The proximal end of the piston is operatively connected to the drive mechanism, which includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc.:



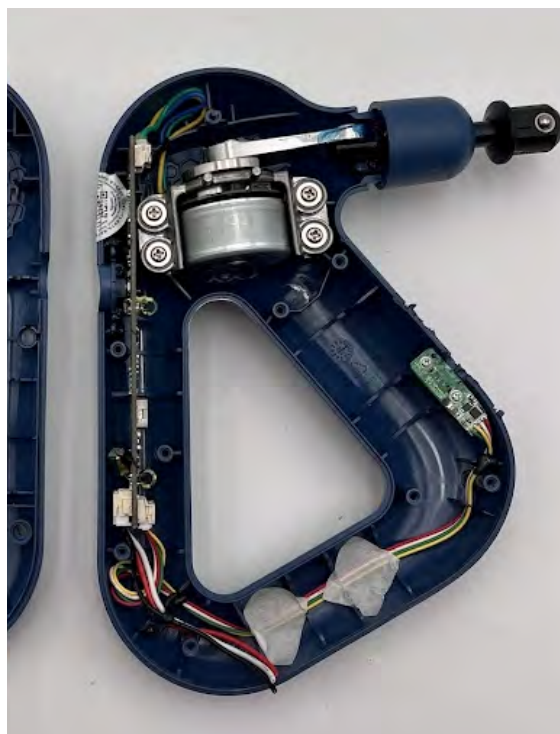
a motor at least partially within the housing

The accused product has a **motor** at least partially within the housing:



In the accused product, the motor is operatively connected to the proximal end of the piston by several structures including the motor shaft, flywheel, a crank pin, a connecting rod, etc.:

and operatively connected to the proximal end of the piston,



wherein the motor is configured to cause the piston to reciprocate at a first speed;	In the accused product, the motor is configured to cause the piston to reciprocate at a first speed. <i>See</i> videos produced herewith.
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a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston; and

The accused product has a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston. The drive mechanism includes the includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc. The stroke length depends on the amount of offset between the centerline of the flywheel and the crank pin.

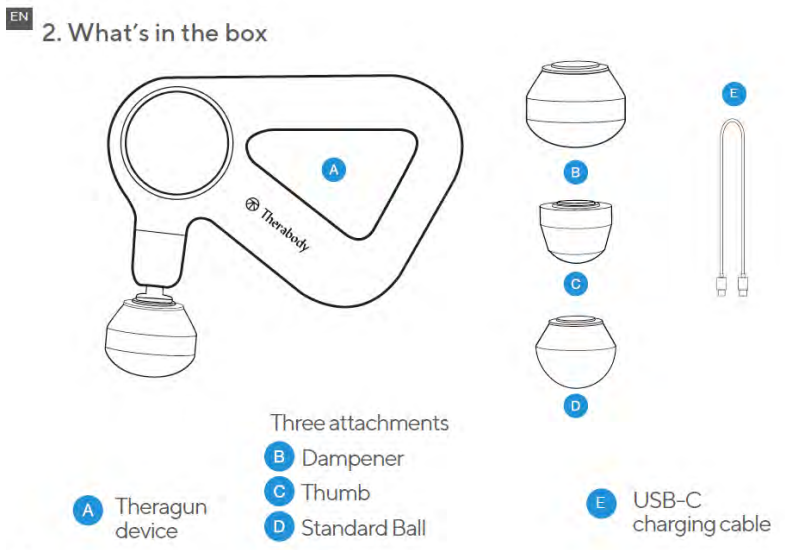
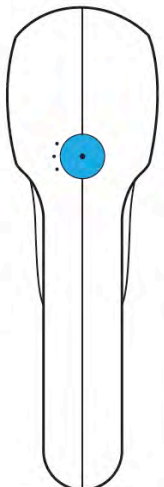


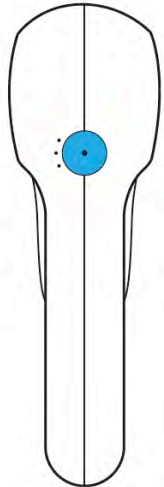
a quick release connector at the distal end of the piston,	The accused product has a quick release connector at the distal end of the piston: 
wherein the quick release connector is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed,	The quick release connector of the accused product is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed. <i>See videos produced herewith.</i>

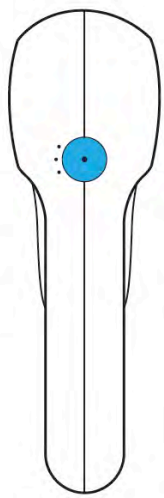
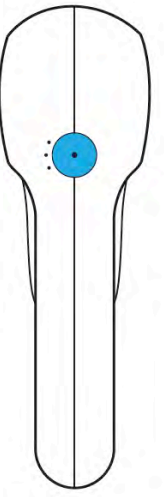
wherein the first massaging head has a substantially cylindrical pocket to receive the quick release connector.

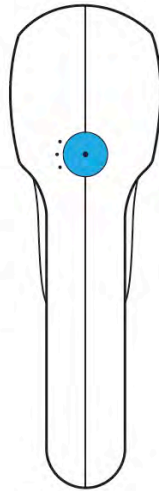
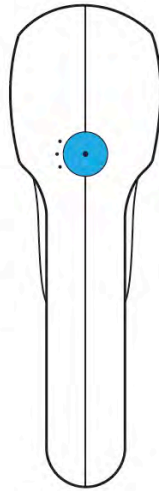
The first massaging head of the accused product has a substantially cylindrical pocket to receive the quick release connector:

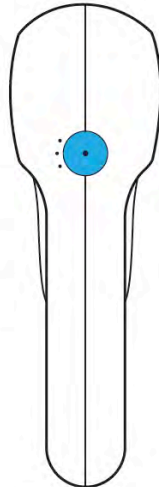


35. The percussive massager of claim 34, further comprising: a second massaging head configured to releasably couple to the distal end of the piston via the quick release connector.	The accused product is sold with a second massaging head that is configured to releasably couple to the distal end of the piston via the quick release connector. EN 2. What's in the box  Three attachments A Theragun device B Dampener C Thumb D Standard Ball E USB-C charging cable 4 <i>See also videos produced herewith.</i>
36. The percussive massager of claim 34, wherein the motor is configured to cause the piston to reciprocate the predetermined stroke length at a second speed.	The motor of the accused product is configured to cause the piston to reciprocate the predetermined stroke length at multiple speeds. EN 5. Using the Theragun Relief 1. To power on the Theragun Relief, long press the button on the device. 2. Move the device across the areas in need of treatment, gradually applying light-to-moderate pressure as needed. Spend approximately 15-20 seconds on each treatment area before gliding the device to the next treatment area. 3. Short press the button to toggle between the three speeds (low, medium, and high) based on your preferences. 4. Warning: The device does not automatically shut off. To turn off your Theragun Relief, firmly long press the button until the device powers off. 

37. The percussive massager of claim 36, wherein the first speed and the second speed are each less than or equal to 3600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are less than or equal to 3600 strokes per minute. <i>See videos produced herewith.</i>
38. The percussive massager of claim 36, wherein the first speed and the second speed are each greater than or equal to 600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are greater than or equal to 600 strokes per minute. <i>See videos produced herewith.</i>
40. The percussive massager of claim 36, further comprising: a control panel positioned on an exterior of the housing	The accused product has a control panel on the exterior of the housing. EN 5. Using the Theragun Relief 1. To power on the Theragun Relief, long press the button on the device. 2. Move the device across the areas in need of treatment, gradually applying light-to-moderate pressure as needed. Spend approximately 15-20 seconds on each treatment area before gliding the device to the next treatment area. 3. Short press the button to toggle between the three speeds (low, medium, and high) based on your preferences. 4. Warning: The device does not automatically shut off. To turn off your Theragun Relief, firmly long press the button until the device powers off.  <i>See also videos produced herewith.</i>

41. The percussive massager of claim 40, wherein the control panel is configured to display one or more visual indicators.	The control panel of the accused product displays one or more visual indicators. EN 5. Using the Theragun Relief 1. To power on the Theragun Relief, long press the button on the device. 2. Move the device across the areas in need of treatment, gradually applying light-to-moderate pressure as needed. Spend approximately 15-20 seconds on each treatment area before gliding the device to the next treatment area. 3. Short press the button to toggle between the three speeds (low, medium, and high) based on your preferences. 4. Warning: The device does not automatically shut off. To turn off your Theragun Relief, firmly long press the button until the device powers off.  <i>See also videos produced herewith.</i>
43. The percussive massager of claim 40, wherein the control panel has one or more inputs.	The control panel of the accused product has one or more inputs. EN 5. Using the Theragun Relief 1. To power on the Theragun Relief, long press the button on the device. 2. Move the device across the areas in need of treatment, gradually applying light-to-moderate pressure as needed. Spend approximately 15-20 seconds on each treatment area before gliding the device to the next treatment area. 3. Short press the button to toggle between the three speeds (low, medium, and high) based on your preferences. 4. Warning: The device does not automatically shut off. To turn off your Theragun Relief, firmly long press the button until the device powers off.  <i>See also videos produced herewith.</i>

44. The percussive massager of claim 43, wherein the one or more inputs comprise at least one of: a button, a switch, and a dial.	The control panel of the accused product has an input comprising a button. EN 5. Using the Theragun Relief 1. To power on the Theragun Relief, long press the button on the device. 2. Move the device across the areas in need of treatment, gradually applying light-to-moderate pressure as needed. Spend approximately 15-20 seconds on each treatment area before gliding the device to the next treatment area. 3. Short press the button to toggle between the three speeds (low, medium, and high) based on your preferences. 4. Warning: The device does not automatically shut off. To turn off your Theragun Relief, firmly long press the button until the device powers off.  <i>See also</i> videos produced herewith.
45. The percussive massager of claim 43, wherein the first speed and the second speed are each selectable via the one or more inputs.	The button on the control panel of the accused product allows speed selection. EN 5. Using the Theragun Relief 1. To power on the Theragun Relief, long press the button on the device. 2. Move the device across the areas in need of treatment, gradually applying light-to-moderate pressure as needed. Spend approximately 15-20 seconds on each treatment area before gliding the device to the next treatment area. 3. Short press the button to toggle between the three speeds (low, medium, and high) based on your preferences. 4. Warning: The device does not automatically shut off. To turn off your Theragun Relief, firmly long press the button until the device powers off.  <i>See also</i> videos produced herewith.

46. The percussive massager of claim 43, wherein a first selection of the one or more inputs is configured to cause the percussive massager to power on and wherein a second selection of the one or more inputs is configured to cause the percussive massager to power off.	The button on the control panel of the accused product turns the product on or off. EN 5. Using the Theragun Relief 1. To power on the Theragun Relief, long press the button on the device. 2. Move the device across the areas in need of treatment, gradually applying light-to-moderate pressure as needed. Spend approximately 15-20 seconds on each treatment area before gliding the device to the next treatment area. 3. Short press the button to toggle between the three speeds (low, medium, and high) based on your preferences. 4. Warning: The device does not automatically shut off. To turn off your Theragun Relief, firmly long press the button until the device powers off.  <i>See also</i> videos produced herewith.
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58. The percussive massager of claim 34, wherein the motor has an output shaft configured to rotate about a rotation axis, and wherein the drive mechanism comprises: a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston.

In the accused product, the motor has an output shaft configured to rotate about a rotation axis, and the drive mechanism comprises a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston:



59. The percussive massager of claim 58, wherein an offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston.

In the accused product, the offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston:



60. The percussive massager of claim 59, wherein the motor is directly connected to the flywheel, and wherein the crank pin is directly connected to the flywheel.

In the accused product, the motor is directly connected to the flywheel, and the crank pin is directly connected to the flywheel.



EXHIBIT 7

Claim Chart – U.S. Patent No. 11,857,482 – Theragun Sense

U.S. Patent No. 11,857,482	<u>Theragun Sense</u>
34. A percussive massager comprising:	The accused product is a percussive massager:  

a housing;

The accused product has a housing:



a piston in the housing having a proximal end and a distal end,

The accused product has a piston in the housing with a proximal end and a distal end. The proximal end of the piston is operatively connected to the drive mechanism, which includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc.:



a motor at least partially within the housing

The accused product has a **motor** at least partially within the housing:



and operatively connected to the proximal end of the piston,

In the accused product, the motor is operatively connected to the proximal end of the piston by several structures including the motor shaft, flywheel, a crank pin, a connecting rod, etc.:



wherein the motor is configured to cause the piston to reciprocate at a first speed;	In the accused product, the motor is configured to cause the piston to reciprocate at a first speed. <i>See</i> videos produced herewith.
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a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston; and

The accused product has a drive mechanism between the motor and the piston that controls a predetermined stroke length of the piston. The drive mechanism includes the includes a connecting rod, a crank pin, a flywheel, the motor shaft, etc. The stroke length depends on the amount of offset between the centerline of the flywheel and the crank pin.



a quick release connector at the distal end of the piston,	The accused product has a quick release connector at the distal end of the piston: 
wherein the quick release connector is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed,	The quick release connector of the accused product is configured to secure a first massaging head while the piston reciprocates a predetermined stroke length at the first speed. <i>See videos produced herewith.</i>

wherein the first massaging head has a substantially cylindrical pocket to receive the quick release connector.

The first massaging head of the accused product has a substantially cylindrical pocket to receive the quick release connector:



35. The percussive massager of claim 34, further comprising:
a second massaging head configured to releasably couple to the distal end of the piston via the quick release connector.

The accused product is sold with a second massaging head that is configured to releasably couple to the distal end of the piston via the quick release connector.



See also videos produced herewith.

36. The percussive massager of claim 34, wherein the motor is configured to cause the piston to reciprocate the predetermined stroke length at a second speed.

The motor of the accused product is configured to cause the piston to reciprocate the predetermined stroke length at multiple speeds.



EN Step 2

Turn on and try the device.

Firmly long press the center button to turn on the device. The device's LCD screen will light up when the device is on. You can select Quick Start or toggle through a variety of treatment routines using the up and down buttons. Press the center button to select your treatment. Move the Theragun Sense device back and forth over the area you're treating and experiment with different amounts of light-to-moderate pressure on your body. Do not start by putting pressure directly on an area of discomfort. Instead, work slowly around the area to reduce tension.

Step 3

Use the Therabody app

Connect your Theragun Sense device to the Therabody app to learn more about how to use the device, access step-by-step guided routines, and receive recommendations based on your personal wellness goals, activities, and concerns. Using the Therabody app, you can also download the guided routines directly to your Theragun Sense device for quick, on-the-go access.

7. Using the Theragun Sense

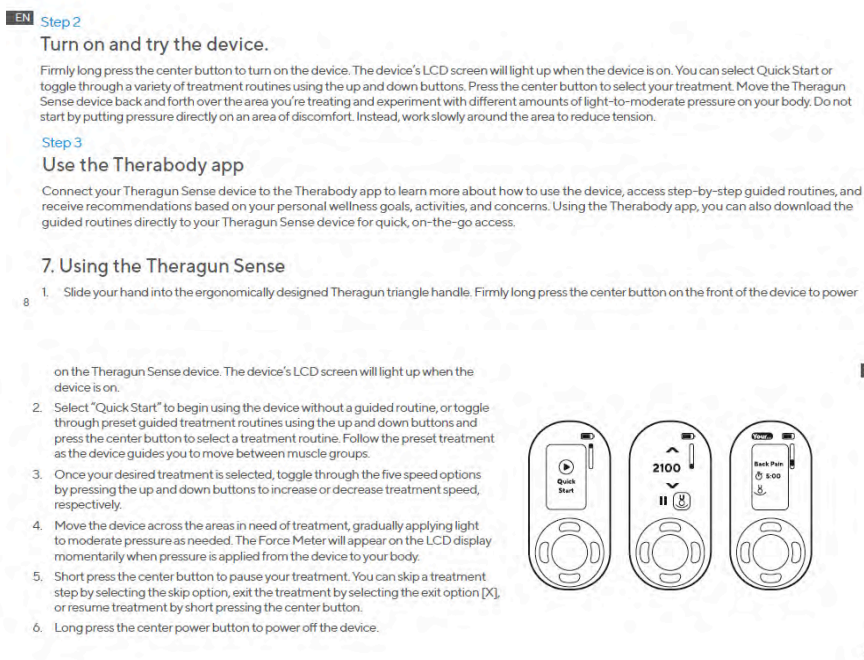
1. Slide your hand into the ergonomically designed Theragun triangle handle. Firmly long press the center button on the front of the device to power

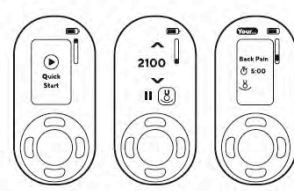
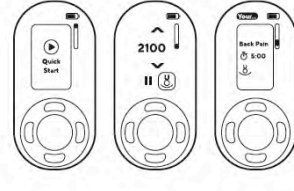
37. The percussive massager of claim 36, wherein the first speed and the second speed are each less than or equal to 3600 strokes per minute.

The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are less than or equal to 3600 strokes per minute.



See also videos produced herewith.

38. The percussive massager of claim 36, wherein the first speed and the second speed are each greater than or equal to 600 strokes per minute.	The motor of the accused product is configured to cause the piston to reciprocate at two or more speeds that are greater than or equal to 600 strokes per minute.  <i>See also videos produced herewith.</i>
40. The percussive massager of claim 36, further comprising: a control panel positioned on an exterior of the housing	The accused product has a control panel on the exterior of the housing.  <i>See also videos produced herewith.</i>

41. The percussive massager of claim 40, wherein the control panel is configured to display one or more visual indicators.	The control panel of the accused product displays one or more visual indicators.  on the Theragun Sense device. The device's LCD screen will light up when the device is on. 2. Select "Quick Start" to begin using the device without a guided routine, or toggle through preset guided treatment routines using the up and down buttons and press the center button to select a treatment routine. Follow the preset treatment as the device guides you to move between muscle groups. 3. Once your desired treatment is selected, toggle through the five speed options by pressing the up and down buttons to increase or decrease treatment speed, respectively. 4. Move the device across the areas in need of treatment, gradually applying light to moderate pressure as needed. The Force Meter will appear on the LCD display momentarily when pressure is applied from the device to your body. 5. Short press the center button to pause your treatment. You can skip a treatment step by selecting the skip option, exit the treatment by selecting the exit option [X], or resume treatment by short pressing the center button. 6. Long press the center power button to power off the device. See also videos produced herewith.
43. The percussive massager of claim 40, wherein the control panel has one or more inputs.	The control panel of the accused product has one or more inputs. 6. Getting started Powering The Theragun Device On and Off. To turn on your Theragun Sense device, firmly long press the center button on the device. Firmly long press the same button to power off the device.  Step 1 Pick up and hold the device. Our patented Theragun triangle multi-grip handle design is three-sided, so you can hold the Theragun Sense device from any side in a variety of ways. Reverse  on the Theragun Sense device. The device's LCD screen will light up when the device is on. 2. Select "Quick Start" to begin using the device without a guided routine, or toggle through preset guided treatment routines using the up and down buttons and press the center button to select a treatment routine. Follow the preset treatment as the device guides you to move between muscle groups. 3. Once your desired treatment is selected, toggle through the five speed options by pressing the up and down buttons to increase or decrease treatment speed, respectively. 4. Move the device across the areas in need of treatment, gradually applying light to moderate pressure as needed. The Force Meter will appear on the LCD display momentarily when pressure is applied from the device to your body. 5. Short press the center button to pause your treatment. You can skip a treatment step by selecting the skip option, exit the treatment by selecting the exit option [X], or resume treatment by short pressing the center button. 6. Long press the center power button to power off the device. See also videos produced herewith.

44. The percussive massager of claim 43, wherein the one or more inputs comprise at least one of: a button, a switch, and a dial.	The control panel of the accused product has an input comprising a button. 6. Getting started Powering The Theragun Device On and Off. To turn on your Theragun Sense device, firmly long press the center button on the device. Firmly long press the same button to power off the device. Step 1 Pick up and hold the device. Our patented Theragun triangle multi-grip handle design is three-sided, so you can hold the Theragun Sense device from any side in a variety of ways.  A line drawing of the Theragun Sense device, which is a handheld percussive massager. It has a triangular grip. A dashed line points from the text 'firmly long press the center button' to a small blue circular button located in the center of the top triangular grip. Reverse <i>See also</i> videos produced herewith.
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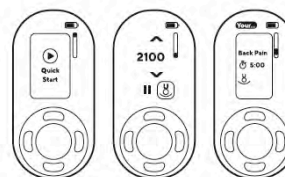
45. The percussive massager of claim 43, wherein the first speed and the second speed are each selectable via the one or more inputs.

The button on the control panel of the accused product allows speed selection.



on the Theragun Sense device. The device's LCD screen will light up when the device is on.

2. Select "Quick Start" to begin using the device without a guided routine, or toggle through preset guided treatment routines using the up and down buttons and press the center button to select a treatment routine. Follow the preset treatment as the device guides you to move between muscle groups.
3. Once your desired treatment is selected, toggle through the five speed options by pressing the up and down buttons to increase or decrease treatment speed, respectively.
4. Move the device across the areas in need of treatment, gradually applying light to moderate pressure as needed. The Force Meter will appear on the LCD display momentarily when pressure is applied from the device to your body.
5. Short press the center button to pause your treatment. You can skip a treatment step by selecting the skip option, exit the treatment by selecting the exit option [X], or resume treatment by short pressing the center button.
6. Long press the center power button to power off the device.



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See also videos produced herewith.

46. The percussive massager of claim 43, wherein a first selection of the one or more inputs is configured to cause the percussive massager to power on and wherein a second selection of the one or more inputs is configured to cause the percussive massager to power off.	The button on the control panel of the accused product turns the product on or off. 6. Getting started Powering The Theragun Device On and Off. To turn on your Theragun Sense device, firmly long press the center button on the device. Firmly long press the same button to power off the device. Step 1 Pick up and hold the device. Our patented Theragun triangle multi-grip handle design is three-sided, so you can hold the Theragun Sense device from any side in a variety of ways.  The diagram shows a side view of the Theragun Sense device. A dashed line points from the text 'Firmly long press the center button on the device' to a small, circular button located on the top surface of the device's handle. The button has a blue center and a grey outer ring. Reverse <i>See also</i> videos produced herewith.
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58. The percussive massager of claim 34, wherein the motor has an output shaft configured to rotate about a rotation axis, and wherein the drive mechanism comprises: a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston.

In the accused product, the motor has an output shaft configured to rotate about a rotation axis, and the drive mechanism comprises a flywheel operatively connected to the output shaft of the motor to rotate about a flywheel axis, the output shaft extending into the flywheel along the flywheel axis; and a crank pin extending from the flywheel, the crank pin being operatively connected to the piston:



59. The percussive massager of claim 58, wherein an offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston.

In the accused product, the offset between the flywheel axis and an axis of the crank pin controls the predetermined stroke length of the piston:



60. The percussive massager of claim 59, wherein the motor is directly connected to the flywheel, and wherein the crank pin is directly connected to the flywheel.

In the accused product, the motor is directly connected to the flywheel, and the crank pin is directly connected to the flywheel.



CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 2121 Avenue of the Stars, Suite 2600, Los Angeles, CA 90067.

On July 5, 2024, I served true copies of the following document(s) described as:

PLAINTIFFS' DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS

on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address eperkins@millerbarondess.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 5, 2024, at Los Angeles, California.

/s/ Erica Perkins
Erica Perkins

SERVICE LIST
Hyperice, Inc. et al v. Therabody, Inc.
Case No. 8:24-cv-00390-JWH-DFM

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