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Hyper Ice, Inc.

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

THERABODY, INC.,

Plaintiff,

v.

HYPER ICE, INC.,

Defendant.

HYPER ICE, INC.,

Counterclaimant,

v.

THERABODY, INC.,

Counter-Defendant.

Case No. 8:26-cv-00003-JWH-KES

**DEFENDANT HYPER ICE, INC.'S
INVALIDITY CONTENTIONS**

Hon. John W. Holcomb

Therabody EX2006
Hyper Ice v. Therabody
PGR2026-00051

CASE NO. 8:26-CV-00003-JWH-KES

1 Defendant and Counterclaimant Hyper Ice, Inc. (“Hyperice” or
2 “Defendant”) hereby provides its Disclosure of Invalidity Contentions to Plaintiff
3 Therabody, Inc. (“Therabody” or “Plaintiff”) as to U.S. Patent No. 12,396,919 (the
4 “’919 Patent”) pursuant to Patent L.R. 3–3.

5 Plaintiff has asserted the ’919 Patent against Defendant. First Amended
6 Complaint (Dkt. 20). In Plaintiff’s Patent Local Rule 3-1 and 3-2 Disclosure of
7 Asserted Claims and Infringement Contentions served on May 22, 2026, Plaintiff
8 asserted claims 1–20 of the ’919 Patent (the “Asserted Claims”) against Defendant.
9 Defendant submits these Invalidity Contentions without waiving any argument
10 about the sufficiency or substance of Plaintiff’s Infringement Contentions.

11 Based on its investigation to date, Defendant hereby: (a) identifies each item
12 of prior art that anticipates each asserted claim or renders it obvious; (b) specifies
13 whether each such item of prior art anticipates each asserted claim and/or renders
14 it obvious and, if a combination of items of prior art makes a claim obvious,
15 identifies each such combination and the motivation to combine such items; (c)
16 submits a chart identifying where specifically in each item of prior art each element
17 of each asserted claim is found; and (d) identifies any grounds of invalidity of the
18 asserted claims based on indefiniteness under, lack of enablement, or lack of
19 written description under 35 U.S.C. § 112.

20 In addition, pursuant to Patent Local Rule 3-4, and based on its investigation
21 to date, Defendant has produced or is producing documents concurrently with these
22 Invalidity Contentions.

23 **I. GENERAL RESERVATIONS**

24 Defendant reserves the right to amend these contentions. To the extent
25 Plaintiff provides further details regarding its infringement theory (or theories),
26 Defendant reserves the right to amend and supplement its disclosures to show
27 where the accused features were taught in the prior art and/or how relevant claim
28 limitations were not properly disclosed in the specification.

1 Defendant further reserves the right to amend these contentions because
2 discovery has just begun. For example, Plaintiff and third parties may possess
3 relevant documents and things, such as prior art products, systems, manuals,
4 specifications, and papers. Defendant reserves the right to amend and supplement
5 these contentions in view of materials discovered or produced after the date of these
6 contentions.

7 To the extent Plaintiff contends that any limitations are missing from the
8 prior art, Defendant reserves the right to identify additional disclosures and
9 teachings in the cited references or in other references.

10 The Court has also not yet construed the claims. Defendant reserves the right
11 to amend these contentions to account for the claim constructions provided by the
12 Court or in view of Plaintiff's proposed claim constructions. To be clear,
13 Defendant's disclosure of these contentions should not be construed as conceding
14 or adopting any argument regarding claim construction. These invalidity
15 contentions include alternative theories premised on apparent interpretations of the
16 claims being pursued by Plaintiff. Including these theories does not bind Defendant
17 to any claim construction or suggest that Plaintiff's interpretations of the claims
18 should be adopted.

19 Finally, Defendant's contentions should not be construed as exhaustive. The
20 prior art is rich and crowded. Defendant's contentions identify exemplary prior art,
21 but Defendant reserves the right to further provide evidence of well-known
22 principles from the prior art, the state of the art, old modes and devices, and
23 additional charts in view of Plaintiff's allegations. Where a reference is cited below
24 or in Defendant's charts as disclosing a certain claim limitation or feature,
25 Defendant also contends that the reference renders obvious that limitation. Where
26 a reference is cited below or in Defendant's charts as rendering obvious a certain
27 claim limitation, Defendant does not admit that the limitation is not disclosed, and
28 reserves the right to show that the limitation is disclosed as well as obvious.

Moreover, nothing in these contentions should be viewed as an admission that other portions, sections, figures, or disclosures within a reference do not also disclose, teach, or otherwise suggest features of the asserted claims.

Additionally, Defendant reserves the right to use these disclosures, as well as further discovery and disclosures relating to the alleged utility and advantages of the asserted claims over old modes and devices, for purposes of any damages issues in the case.

Furthermore, “[a] patentee may not assert ‘a scope of equivalency that would encompass, or ensnare, the prior art.’” *Intendis GmbH v. Glenmark Pharms. Inc.*, 822 F.3d 1355 (Fed. Cir. 2016) (quoting *DePuy Spine, Inc. v. Medtronic Sofamor Danek, Inc.*, 567 F.3d 1314, 1322 (Fed. Cir. 2009)). To the extent Plaintiff asserts the doctrine of equivalents for any of the claimed limitations, they would ensnare the prior art for the reasons and based on the evidence discussed below and in the accompanying charts. Defendant reserves the right to use these disclosures as well as further discovery and disclosures for purposes of noninfringement.

II. INVALIDITY UNDER 35 U.S.C. §§ 102 AND 103

The prior art in the field of the ’919 Patent is rich and crowded. Although discovery has just begun and Defendant’s investigation is continuing, Defendant identifies the following items of prior art that anticipate and/or render obvious the asserted claims.

A. Effective Date

Plaintiff alleges that the “[a]ll asserted claims of the ’919 Patent are entitled to a priority date of no later than May 7, 2019.” Plaintiff’s Infring. Cont. at 4. Defendant disputes Plaintiff’s contention that the Asserted Claims are entitled to the May 7, 2019, priority date. Plaintiff submits that each Asserted Claim is entitled to a priority date no earlier than May 7, 2020. Those prior art references identified below that only qualify as prior art based on the May 7, 2020, priority date will be identified by an asterisk.

Defendant reserves all rights to amend these contentions if Plaintiff modifies its priority date position.

B. Prior Art Patents

To the extent that they are prior art, Defendant reserves the right to rely upon foreign counterparts of the U.S. patents identified herein; U.S. counterparts of foreign patents and foreign patent applications identified herein; and U.S. and foreign patents and patent applications corresponding to articles and publications identified herein. Defendant further reserves the right to rely upon parent or ancestor patents or patent applications from which any of the patents or patent applications listed above claim priority as continuation, divisional, or continuation-in-part applications.

Inventor Names	Number	Country	Issue/Pub. Date	Priority Date	Prior Art Basis
Georg Luger	753,414	US	Mar. 1, 1904	Mar. 17, 1900	102(a)(1) 102(a)(2)
Samuel D. Black; Alonzo G. Decker	1,245,860	US	Nov. 6, 1917	Dec. 4, 1914	102(a)(1) 102(a)(2)
Akihiko Teranishi	3,837,335	US	Sept. 24, 1974	Apr. 13, 1973	102(a)(1) 102(a)(2)
Edward D. Noble; Duke Harding	4,730,605	US	Mar. 15, 1988	July 14, 1986	102(a)(1) 102(a)(2)
Thomas Elliot	5,618,315	US	Apr. 8, 1997	Jan. 11, 1995	102(a)(1) 102(a)(2)

Edward D. Noble	5,716,332	US	Feb. 10, 1998	Apr. 5, 1994	102(a)(1) 102(a)(2)
Charles Huang	7,491,184 B2	US	Feb. 17, 2009	Dec. 31, 1998	102(a)(1) 102(a)(2)
Evans H. Nguyen; Scott D. Bublitz; Jason R. Crowe; Mike N. Jones;	9,696,362 B2	US	July 4, 2017	Apr. 9, 2008	102(a)(1) 102(a)(2)
Robert Marton; Anthony Katz	10,314,762 B1	US	Jun. 11, 2019	Nov. 12, 2018	102(a)(1)* 102(a)(2)
Ryunosuke KUMAGAI; Akira Tomonaga; Kazuya Arakawa	10,821,577 B2	US	Nov. 3, 2020	Feb. 9, 2017	102(a)(2)
Dashuai Hu	D895,829 S	US	Sep. 8, 2020	Oct. 22, 2018	102(a)(2)
Charles Huang	2001/0027280 A1	US	Oct. 4, 2001	Dec. 31, 1998	102(a)(1) 102(a)(2)
Jay Calvert	2003/0158505 A1	US	Aug. 21, 2003	Feb. 21, 2002	102(a)(1) 102(a)(2)

Tom Pepe	2017/0304145 A1	US	Oct. 26, 2017	Apr. 21, 2016	102(a)(1) 102(a)(2)
Jason Wersland; Benjamin Nazarian; Geert Ensing; Guang Qing Li; Robert Firth; Andrew Linton; Andrew Cooper; Michael Waldron	2018/0200141 A1*	US	July 19, 2018	Mar. 13, 2018	102(a)(1)
Fei-Tyh Chuang	2019/0159961 A1	US	May 30, 2019	Nov. 27, 2017	102(a)(1)* 102(a)(2)
Dashuai HU	2021/0022951 A1	US	Jan. 28, 2021	Jan. 18, 2019	102(a)(2)
Chengyi Hu	CN 109907965 A*	CN	June 21, 2019		102(a)(1)
Chen Lixin	CN 2698334Y	CN	May 11, 2004		102(a)(1)
Zhu Zhicheng	CN 206822844 U	CN	Jan. 2, 2018		102(a)(1)

Zhang Wen	CN 209933448U*	CN	Jan. 14, 2020		102(a)(1)
Kuai Song	CN 209596176 U*	CN	Nov. 8, 2019		102(a)(1)
Kim Gu- bong	KR200345192Y1	KR	Mar. 16, 2004		102(a)(1)
Kazuyuki Takeda; Katsuhiko Yoshida; Tetsuya Kamimura; Fujie Hayakawa	EP1964537 A1	EP	Sept. 3, 2008		102(a)(1)

C. Prior Art Publications

Title	Date	Author	Publisher
YouTube video titled “Introducing the Hypervolt by HYPERICE” ¹	Feb. 26, 2018	Hyperice	YouTube
YouTube video titled “TimTam Power Massager – Unboxing + Usage” ²	Aug. 9, 2018	TimTam Recovery	YouTube

¹ <https://www.youtube.com/watch?v=eI3QbjhGNK0>

² <https://www.youtube.com/watch?v=FgrDoiEA-T4>

1 YouTube video titled 2 “How to Disassemble 3 Thumper Mini Pro 2 4 Massager Repair Switch 5 Clean and Fix”³	June 19, 2018	LEARNINGCORDS	YouTube
6 “The natural angle 7 between the hand and 8 handle and the effect of 9 handle orientation on 10 wrist radial/ulnar 11 deviation during 12 maximal push exertions”	March 20, 2013	Justin G. Young; Jia-Hua Lin; Chien- Chi Chang; Raymond W. McGorry	Taylor & Francis

14 **D. Prior Art Uses, Sales, and Offers for Sale**

15 Discovery has just begun and Defendant’s investigation is continuing;
 16 nevertheless, Defendant identifies the following prior art systems/devices. These
 17 systems or devices were either in public use, on sale, or otherwise available to the
 18 public before Plaintiff’s alleged priority date of the Asserted Claims. Defendant
 19 reserves the right to amend and supplement these disclosures to identify additional
 20 models, versions, products, devices, systems, and dates, in view of discovery
 21 obtained subsequent to the date of these contentions, including from third parties.
 22 Defendant also reserves the right to amend and supplement these disclosures to
 23 identify and/or chart products that embody or directly relate to the patents and
 24 publications listed above.

25
 26
 27
 28 ³ <https://www.youtube.com/watch?v=luLPUUnGHmw>

Prior Art Product(s) / System(s)	Associated Individuals / Entities	Known Dates
Hyperice Hypervolt	Hyper Ice, Inc.	March 14, 2018 ⁴
TimTam PowerMassager	TimTam Performance	Aug. 9, 2018 ⁵
Thumper Mini Pro 2	Thumper Massager Inc.	June 19, 2018 ⁶

To the extent that they are prior art, Defendant reserves the right to rely upon patents, patent applications (both U.S. and foreign), and publications describing the aforementioned prior art devices and systems. Defendant further contends that each of the disclosures in the prior art patents, prior art publications, and prior art uses, sales, and offers for sale constitutes prior disclosures to the Asserted Claims.

Each disclosed item of prior art is evidence of a prior disclosure, invention, making, using, and/or offering for sale of the claimed invention under 35 U.S.C. § 102, as evidenced by the named inventor, authors, organizations, and publishers involved with each such reference, with the circumstances described and reflected in each reference including publications and system implementation references. Defendant further intends to rely on admissions of the named inventors concerning the prior art, including statements found in the asserted patents, their prosecution histories, related patents and/or patent applications, any deposition testimony, and the papers filed and any evidence submitted by Plaintiff in conjunction with this litigation.

For systems and products that are disclosed, Defendant also intends to rely on additional information describing those same systems and products, including information received from third parties in response to subpoenas. In addition, Defendant's own product/system (the Hypervolt) predates Defendant's alleged

⁴ See <https://www.youtube.com/watch?v=kFfOI4IM0Tc>

⁵ See <https://www.youtube.com/watch?v=FgrDoiEA-T4>

⁶ See <https://www.youtube.com/watch?v=luLPUUnGHmw>

1 inventions and illustrates that at least some of the Asserted Claims are unpatentable
2 and offer little, if any, benefit over old modes and devices.

3 Additionally, many of the prior art references are related patent applications
4 and issued patents that contain substantially the same subject matter (*e.g.*,
5 published U.S. patent applications, and issued U.S. patents, foreign applications or
6 issued patents). Any citation to, reference to, or quotation from any of these patent
7 applications or patents, therefore, should be understood as encompassing any
8 parallel citation to the same subject matter in other related or corresponding
9 applications or patents.

10 Defendant also reserves the right to later rely upon all references or portions
11 of references provided above to supplement or amend its disclosures contained
12 herein. Also, to the extent not expressly mentioned herein, Defendant incorporates
13 by reference (1) any and all prior art contained or identified in documents produced
14 thus far by Plaintiff to Defendant in this case; (2) any and all additional materials
15 regarding invalidity that should have been produced to Defendant but have not been
16 produced to date, to the extent that any exist; and (3) any prior art of which the
17 named inventors of the '919 Patent is aware and/or on which they contend the
18 alleged invention of the asserted patents build upon or improve.

19 Many of the cited references cite or relate to additional references and/or
20 products, services, or projects. Defendant may also rely upon the disclosures of the
21 references cited and/or discussed during the prosecution of the '919 Patent and/or
22 the assertions presented regarding those references.

23 Additionally, because discovery has only recently commenced, Defendant
24 reserves the right to present additional prior art references and/or disclosures under
25 35 U.S.C. §§ 102 and/or 103 located during the course of such discovery or further
26 investigation.

1 Defendant reserves the right to move to amend these Invalidity Contentions
2 for good cause and/or modify its selection of prior art references if Plaintiff
3 modifies its alleged priority date for the Asserted Claims. Defendant also reserves
4 the right to move to amend these Invalidity Contentions and/or to modify their
5 selection of prior art references in the event that Plaintiffs serve supplemental or
6 modified infringement contentions.

7
8 **III. REFERENCES THAT ANTICIPATE AND/OR RENDER OBVIOUS**
9 **THE ASSERTED CLAIMS AND MOTIVATIONS TO COMBINE**

10 Pursuant to Patent Local Rule 3-3, and subject to Defendant's reservation of
11 rights, Defendant identifies the attached and cited prior art that anticipate the
12 asserted claims under at least 35 U.S.C. §§ 102, either expressly or inherently,
13 and/or render obvious the asserted claims under 35 U.S.C. § 103 either alone or in
14 combination with other references. Each asserted claim is anticipated by, and/or
15 obvious in view of, one or more items of prior art identified in these disclosures,
16 alone or in combination.

17 Much of the art identified in the attached charts reflects common knowledge
18 and the state of the art at the time of the earliest priority date of the '919 Patent.
19 Defendant may rely on additional citations, references, expert testimony, fact
20 testimony and other corroborating evidence, and other material to provide context
21 and background illustrating the knowledge of a person of ordinary skill in the art
22 at the time of the claimed inventions and/or to aid in understanding the cited
23 portions of the references and/or cited features of the systems. Defendant may also
24 rely on expert testimony explaining relevant portions of references, relevant
25 products or systems, and other discovery regarding these subject matters.
26 Additionally, Defendant may rely on other portions of any prior art reference for
27 purposes of explaining the background and general technical subject area of the
28 reference. Defendant also reserves all rights to provide expert discovery and expert

1 testimony in accordance with the case and case schedule.

2 Where an individual reference is cited with respect to all elements of an
3 asserted claim, Defendant contends that the reference anticipates the claim under
4 U.S.C. § 102 and also renders obvious the claim under 35 U.S.C. § 103, both by
5 itself in view of the knowledge of a person of ordinary skill in the art and in
6 combination with the other cited references to the extent the reference is not found
7 to disclose one or more claim elements.

8 To the extent Plaintiff contends that an embodiment within a particular item
9 of prior art does not fully disclose all limitations of a claim, Defendant accordingly
10 reserves its right to rely on other embodiments in that prior art reference, or other
11 information, to show single reference obviousness under 35 U.S.C. § 103.

12 Where an individual reference is cited with respect to fewer than all elements
13 of an asserted claim, Defendant contends that the reference renders obvious the
14 claim under 35 U.S.C. § 103 in view of each other reference and combination of
15 references that discloses the remaining claim element(s), as indicated in the claim
16 charts submitted herewith and in the discussion below. “Under § 103, the scope
17 and content of the prior art are to be determined; differences between the prior art
18 and the claims at issue are to be ascertained; and the level of ordinary skill in the
19 pertinent art resolved. Against this background, the obviousness or nonobviousness
20 of the subject matter is determined.” *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398,
21 406 (2007), quoting *Graham v. John Deere Co. of Kansas City*, 383 U.S. 1, 17
22 (1966). Exemplary motivations to combine references are discussed below and in
23 the accompanying charts. Defendant reserves the right to rely upon any references
24 or assertions identified herein in connection with Defendant’s contention that each
25 asserted claim is invalid under 35 U.S.C. § 103 and to rely upon expert testimony
26 addressing such references and assertions. The fact that prior art is identified to
27 anticipate the asserted claims presents no obstacle in also relying on that reference
28 as a basis for invalidity based on obviousness. To the extent any prior art item cited

1 above may not fully disclose a limitation of an asserted claim or is alleged by
2 Plaintiffs to lack disclosure of the limitation, such limitation is present and
3 identified in another prior art item as shown in the attached claim charts.

4 Although Defendant has identified at least one disclosure of a limitation for
5 each prior art reference, each and every disclosure of the same limitation in the
6 same reference is not necessarily identified. In an effort to focus the issues,
7 Defendant cites representative portions of an identified reference, even where a
8 reference may contain additional support for a particular claim limitation. A person
9 of ordinary skill in the art generally reads an item of prior art as a whole and in the
10 context of other publications and literature. Thus, to understand and interpret any
11 specific statement or disclosure within a prior art reference, such persons would
12 rely on other information within the reference, along with other publications and
13 their general scientific knowledge. As such, Defendant may rely upon uncited
14 portions of the prior art references and on other publications and expert testimony
15 to provide context, and as aids to understanding and interpreting the portions that
16 are cited.

17 **A. Obviousness and Motivations to Combine**

18 Each prior art reference may be combined with one or more other prior art
19 references to render obvious the Asserted Claims in combination, as explained in
20 more detail below. The disclosures of these references also may be combined with
21 information known to persons skilled in the art as of the effective filing date of the
22 Asserted Claims, and understood and supplemented in view of the common sense
23 of persons skilled in the art at the time as of the effective filing date of the Asserted
24 Claims, including any statements in the intrinsic record of the '919 Patent and
25 related applications.

26 A person of ordinary skill would have been motivated to combine the
27 identified prior art based on the nature of the problem to be solved, the teachings
28 of the prior art, and the knowledge of persons of ordinary skill in the art. The

1 identified prior art references, including portions cited in the invalidity charts,
2 address the same or similar technical issues and suggest the same or similar
3 solutions to those issues as the asserted claims. On such basis, on an element-by-
4 element basis, Defendant expressly intends to combine one or more prior art items
5 identified in the attached charts with each other to address any further contentions
6 from Plaintiffs that a particular prior art item supposedly lacks one or more
7 elements of an asserted claim. In other words, Defendant contends that each charted
8 prior art item can be combined with other charted prior art items when a particular
9 prior art item lacks or does not explicitly disclose an element or feature of an
10 asserted claim. The suggested obviousness combinations described below are not
11 to be construed to suggest that any reference included in the combinations is not
12 anticipatory. Further, to the extent that Plaintiffs contend that any of the
13 anticipatory prior art fails to disclose one or more limitations of the asserted claims,
14 Defendant reserves the right to identify other prior art references that, when
15 combined with the anticipatory prior art, would render the claims obvious despite
16 an allegedly missing limitation. Defendant will further specify the motivations to
17 combine the prior art, including through reliance on expert testimony, at the
18 appropriate later stage of this lawsuit.

19 A person of skill in the art would have been motivated to combine the
20 identified prior art items. As the United States Supreme Court held in *KSR Int'l Co.*
21 *v. Teleflex, Inc.*, 550 U.S. 398, 416 (2007): “The combination of familiar elements
22 according to known methods is likely to be obvious when it does no more than
23 yield predictable results.” The Supreme Court further held that, “[w]hen a work is
24 available in one field of endeavor, design incentives and other market forces can
25 prompt variations of it, either in the same field or a different one. If a person of
26 ordinary skill can implement a predictable variation, § 103 likely bars its
27 patentability. For the same reason, if a technique has been used to improve one
28 device, and a person of ordinary skill in the art would recognize that it would

1 improve similar devices in the same way, using the technique is obvious unless its
2 actual application is beyond his or her skill.” *Id.* at 417.

3 The Supreme Court has further held that “in many cases a person of ordinary
4 skill will be able to fit the teachings of multiple patents together like pieces of a
5 puzzle.” *Id.* at 420. It is sufficient that a combination of elements was “obvious to
6 try” holding that, “[w]hen there is a design need or market pressure to solve a
7 problem and there are a finite number of identified, predictable solutions, a person
8 of ordinary skill has good reason to pursue the known options within his or her
9 technical grasp. If this leads to the anticipated success, it is likely the product not
10 of innovation but of ordinary skill and common sense.” *Id.* at 421. “In that instance
11 the fact that a combination was obvious to try might show that it was obvious under
12 § 103.” *Id.* Finally, the Supreme Court recognized that “[g]ranting patent protection
13 to advances that would occur in the ordinary course without real innovation retards
14 progress and may, in the case of patents combining previously known elements,
15 deprive prior inventions of their value or utility.” *Id.* at 419. All of the following
16 rationales recognized in *KSR* support a finding of obviousness:

- 17 • Combining prior art elements according to known methods to yield
18 predictable results;
- 19 • Simple substitution of one known element for another to obtain
20 predictable results;
- 21 • Use of known technique to improve similar devices (methods, or
22 products) in the same way;
- 23 • Applying a known technique to a known device (method, or product)
24 ready for improvement to yield predictable results;
- 25 • “Obvious to try”—choosing from a finite number of identified,
26 predictable solutions, with a reasonable expectation of success;
- 27 • Known work in one field of endeavor may prompt variations of it for
28 use in either the same field or a different one based on design
incentives or other market forces if the variations would have been
predictable to one of ordinary skill in the art; and
- Some teaching, suggestion, or motivation in the prior art that would

1 have led one of ordinary skill to modify the prior art reference or to
2 combine prior art reference teachings to arrive at the claimed
3 invention.

4 Certain of these rationales are discussed more specifically below. The fact
5 that others are not discussed more specifically should not be interpreted as an
6 admission or concession that it does not apply. To the contrary, the discussion
7 below simply provides more explanation of these specific rationales.

8 Defendant further contends that the prior art identified in these invalidity
9 contentions is evidence of simultaneous or near-simultaneous independent
10 invention/disclosure by others of the alleged invention as recited in one or more of
11 the Asserted Claims. Defendant reserves its right to rely on the simultaneous or
12 near-simultaneous independent invention/disclosure by others as further evidence
13 of the obviousness of the Asserted Claims.

14 Each limitation of the Asserted Claims was well known to those of ordinary
15 skill in the art before the proper priority date of the Asserted Claims, as detailed
16 below and in the attached charts.

17 The elements recited in the Asserted Claims are mere combinations and
18 modifications of these well-known elements. A person of ordinary skill in the art
19 would be able, and motivated, to improve the existing technology in the same or
20 similar manner by combining or modifying the individual elements that were
21 already known in the art to yield predictable results.

22 Subject to the foregoing, Defendant identifies the following exemplary
23 reasons that skilled artisans would have combined elements of the prior art to
24 render obvious the asserted claims. The fact that others are not discussed more
25 specifically should not be interpreted as an admission or concession that it does not
26 apply. To the contrary, the discussion below simply provides more explanation of
27 these specific rationales.

1 **B. Motivations During Prosecution**

2 Defendant hereby expressly incorporates by reference any statements and
3 reasons set forth by the Examiner during prosecution of the '919 Patent and related
4 patent applications as to why it would have been obvious to modify or combine
5 references to achieve the limitations of the Asserted Claims.

6 **C. Combination of References Through Citations**

7 Numerous prior art references cite to, discuss, or build upon other references.
8 Where one reference cites or discusses another reference, a person of ordinary skill
9 in the art would have been motivated to consider their teachings in combination, as
10 they would be understood to provide related teachings in a similar field.

11 **D. Obviousness Combination Groups and Further Motivations to**
12 **Combine**

13 In addition to combinations of references and motivations to combine
14 identified elsewhere herein, including within claim charts, Defendant identifies
15 combinations and motivations to combine based on references grouped by subject
16 matter, in the manner approved by courts applying the Northern District of
17 California Patent Local Rules regarding invalidity contentions. *See, e.g., Avago*
18 *Techs. Gen IP PTE Ltd. v. Elan Micro. Corp.*, No. 04-05385, 2007 U.S. Dist.
19 LEXIS 97464, at *10-11 (N.D. Cal. Mar. 28, 2007) (organizing prior art references
20 into “groups” and identifying combinations as a set of references “and/or” another
21 set of references); *Keithley v. Homestore.com, Inc.*, 553 F. Supp. 2d 1148, 1150
22 (N.D. Cal. 2008) (“Apple’s grouping method is permissible under the Local
23 Rules”).

24 Defendant identifies references in groups below, based on common subject
25 matter relevant to the asserted claims, for the purpose of disclosing obviousness
26 combinations and further disclosing motivations to combine. The absence of a
27 particular reference from a group is not an admission or suggestion that the
28 reference does not disclose any particular claim limitations.

1 1. Well-Known / Common Concepts

2 a) “Device” References

3 The claims of the ’919 patent recite elements relating to conventional
4 percussive therapy systems and/or devices including a housing, a handle portion, a
5 motor positioned in the housing and configured to output torque about a motor axis.
6 ’919 Patent, cls. 1, 2, 18. These features are common to essentially all percussive
7 therapy devices, also known as percussive massagers.

8 The ’919 Patent does not purport to have invented these conventional
9 percussive therapy technologies and components. As these contentions and the
10 charts demonstrate, nothing about these limitations adds anything novel or non-
11 obvious over the prior art. An ordinarily skilled artisan would have been motivated
12 to use conventional percussive therapy technology and components, which was
13 well-known in the art at the time of the ’919 Patent.

14 The use of conventional percussive therapy technology and components
15 would have been obvious to a person of ordinary skill in the art (“POSITA”) at
16 least because doing so would have involved the combination of prior art elements
17 according to known methods to yield predictable results, the simple substitution of
18 one known element for another to obtain predictable results, the application of a
19 known technique to a known device ready for improvement to yield predictable
20 results, and/or would have been obvious to try, and a POSITA would have had a
21 reasonable expectation of success.

22 Several prior art references disclose conventional percussive therapy
23 technology and components. For example, US 2017/0304145 A1 to Pepe (“Pepe”)
24 discloses a handheld massage device comprising an outer body 11, handles 12/14,
25 a motor unit 20 that houses a motor in the outer body 11, and a removably attached
26 application head 30. Pepe at ¶¶[0024]-[0026].

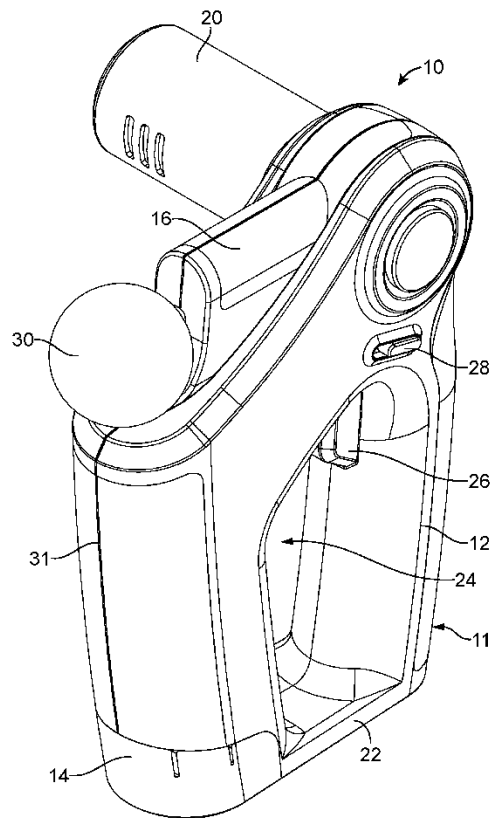


FIG. 1

As another example, CN 109907965 A to Hu (“Hu ’965”) discloses an impact massager comprising a main body 100, a battery structure 200 that comprises a handheld housing 220, a drive motor 111 in the main body 100, and a removably attached massage structure 300. Hu ’965 at ¶¶[0034], [0038], and [0041].

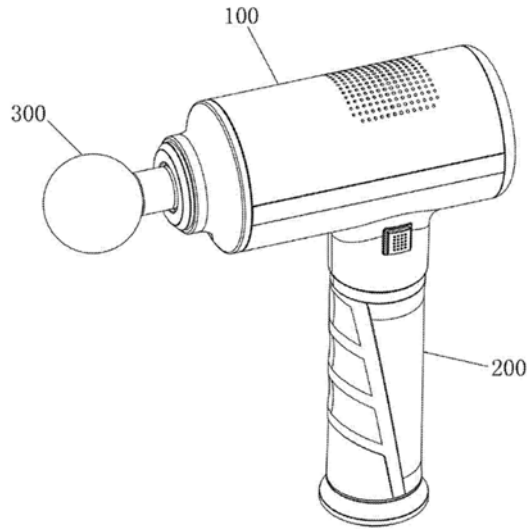


图 1

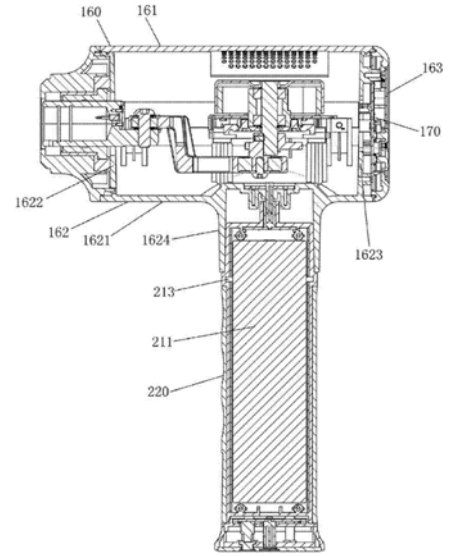


图 10

As yet another example, U.S. Patent No. 10,314,762 B1 to Marton et al. (“Marton”) discloses a battery-powered percussive massage device comprising a main body 110, a cylindrical cover 216 forming a handle, a motor 310 that outputs torque, and a removably attached applicator head 516. Martone at 7:23-27, 8:59-62, 9:57-63, 13:16-50.

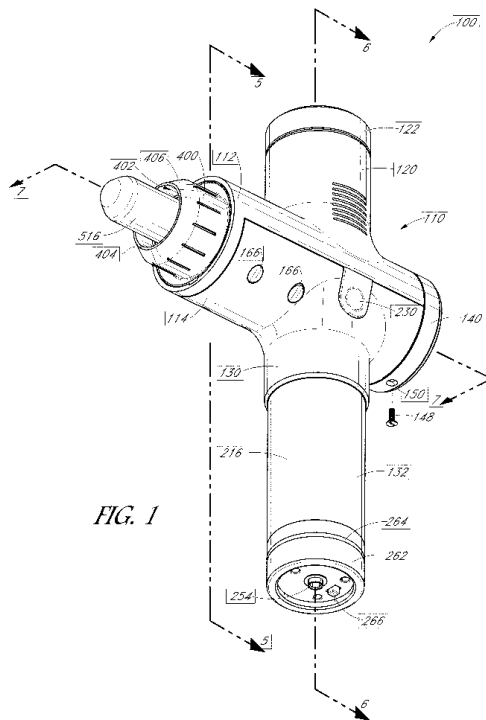


FIG. 1

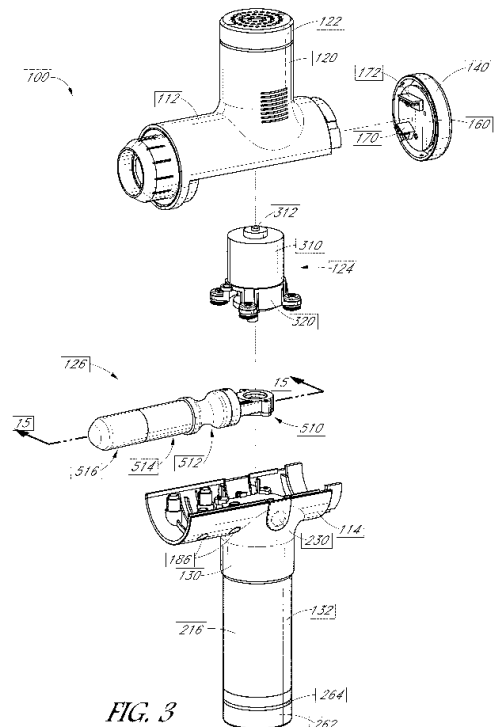


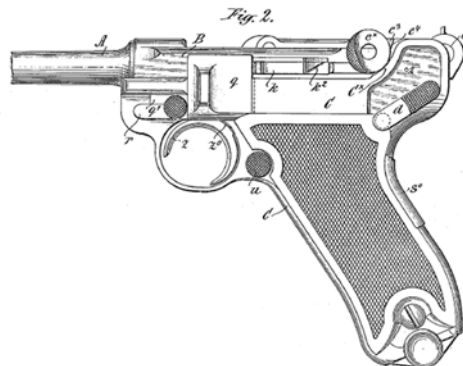
FIG. 3

1 As the above examples make clear, conventional percussive therapy
2 technology and components, including a housing, a handle portion, a motor in the
3 housing and output torque were well known and widely used at the time of the '919
4 Patent. Accordingly, it would have been obvious to a POSITA to use conventional
5 percussive therapy technology and components.

6 **b) "Angled Handle" References**

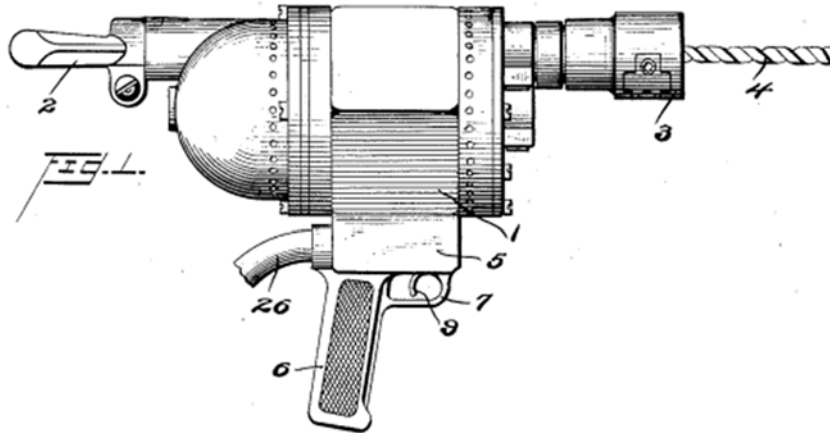
7 The claims of the '919 Patent recite elements relating to a handle portion that
8 extends at an obtuse angle with respect to the output shaft (cl. 1, cl. 15) or at an
9 oblique angle with respect to the reciprocation axis (cl. 2, cl. 18). Collectively, the
10 term "angled handle" will be used to refer to both recitations.

11 Again, the '919 Patent does not purport to have invented these features at
12 least because it does not even mention these features in the written specification.
13 Consistent with this understanding, the use of "angled handles" with handheld
14 device has been known for over a century. Indeed, obtuse-angled handles (when
15 measured against the device's operative axis), colloquially known as "pistol grip"
16 style handles, were already well-known by the early 1900s. The first famous
17 application of the obtuse-angled handle was the Luger P08 pistol, patented in 1904,
18 which featured a 145° angle between the barrel and the handle. U.S. Patent No.
19 753,414 to Luger ("Luger"). The obtuse-angled handle design allows the user's
20 wrist to remain in a natural/neutral orientation while pointing the barrel straight
21 ahead.

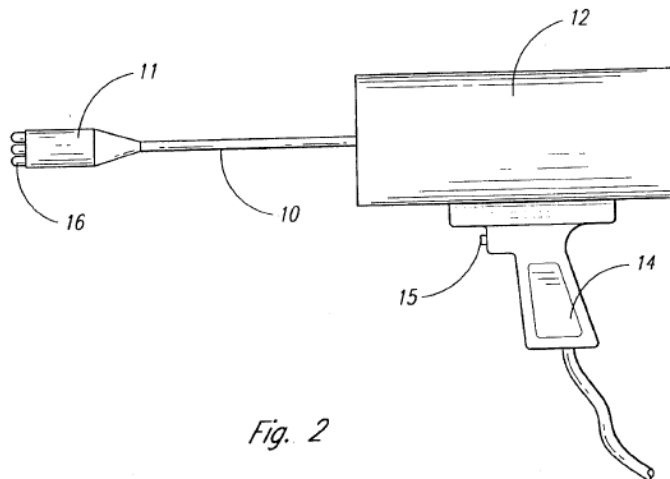


28 In 1917, Black & Decker patented an electric drill featuring a "pistol grip

1 support 6,” which forms an obtuse angle with the drill chuck 3. U.S. Patent No.
2 1,245,860 to Black et al. (“Black”) at 1:69.

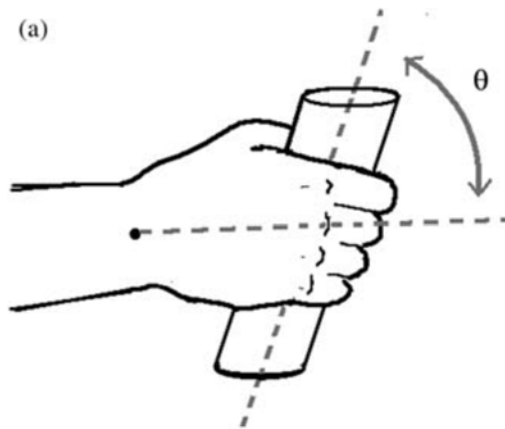


10
11 A spinal adjustment instrument was patented in 1997 that featured “a pistol
12 grip 14” extending at an obtuse angle with respect to the elongated rod 10 “for ease
13 of handling.” U.S. Patent No. 5,618,315 to Elliot (“Elliot”) at 2:65-67.

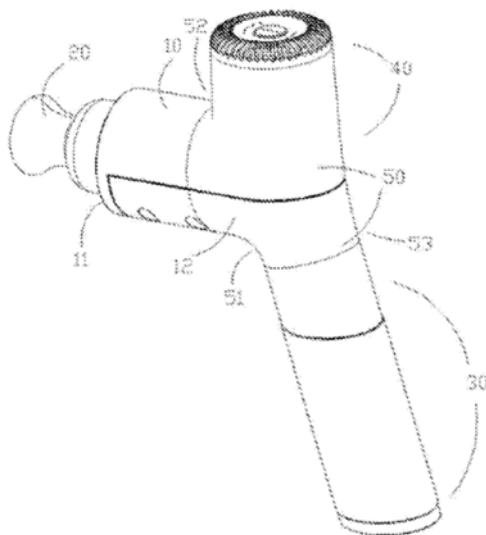


23 In 2013, a study was conducted to quantify the ideal handle angle for use
24 with pushing exertions, which would include percussive massagers. The Natural
25 Angle Between the Hand and Handle and the Effect of Handle Orientation on Wrist
26 Radial/Ulnar Deviation During Maximal Push Exertions, Young et al. (“Young”).
27 According to Young, the “[a]verage [] natural angle over all trials was 65(7)
28 degrees,” which corresponds to theta in the below figure, meaning that the ideal

1 natural angle when measured from the operative axis to the handle is about 115°,
 2 i.e., an obtuse angle. Young at p.7.



10 In the very same field as the '919 Patent, U.S. 2021/0022951 A1 to Hu ("Hu
 11 '951') discloses a handheld muscle massager comprising a main handle 30 that
 12 extends at an angle "that is greater than 90° and less than or equal to 135°" with
 13 respect to the massage body 10. Hu '951 at ¶¶[0034], [0036]. According to Hu
 14 '951, the angled handle can "improve the user experience and is convenient for the
 15 user to apply force, and enhance the massage effect." *Id.* at ¶[0033].



27 Fig. 3

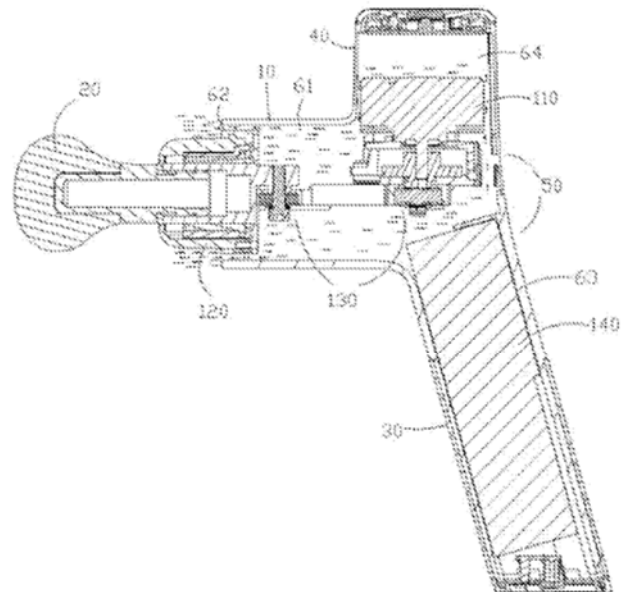


Fig. 5

28 As the above examples make clear, the use of an "angled handle" in handheld

1 devices, including in percussive massager device such as the claimed invention, was
2 well known and widely used as of the effective filing date of the Asserted Claims.

3 A POSITA would have understood that incorporating an “angled handle”
4 into another percussive massager design device was an application of a known
5 ergonomic improvement to a device ready for improvement. *In re GPAC Inc.*, 57
6 F.3d 1573, 1579 (Fed. Cir. 1995) (“The person of ordinary skill in the art is a
7 hypothetical person who is presumed to know the relevant prior art.”). A POSITA
8 would have understood that an angled handle is a predictable design choice for any
9 handheld device, and specifically for percussive massagers where the user is
10 expected to repeatedly apply forward-directed force for extended periods of time.

11 Accordingly, a POSITA would have been motivated to modify another prior
12 art percussive massager device design to include an “angled handle” with a
13 reasonable expectation of success and to provide a known ergonomic improvement.

14 **c) “Offset Push Rod” References**

15 Claim 1 of the ’919 Patent recites “a proximal end of the push rod assembly
16 is connected to the eccentric shaft at a location offset from the dividing plane in a
17 first direction” and claims 2 and 18 recite “the proximal end of the push rod is
18 farther from the reciprocation axis than the distal end is” and “the proximal end of
19 the push rod is coupled to the eccentric shaft at a first location, the distal end of the
20 push rod is connected to the output shaft at a second location, and the first location
21 is farther from the reciprocation axis than the second location is,” respectively.

22 Unlike the other features of the Asserted Claims, the ’919 Patent does
23 purport to have invented these features. The ’919 Patent explains that:

24 In a preferred embodiment, the push rod 14 is L-shaped or includes an
25 arc shape, as shown in FIGS. 22A-22B. Preferably, the point where the
26 push rod 14 is connected to the shaft 16 is offset from the reciprocating
27 path that the distal end 18 of the push rod 14 (and the massager
28 attachment 628) travel. This capability is provided by the arc or L-
shape.

’919 Patent at 14:56-66. According to the ’919 Patent, this particular push rod

shape allows:

[T]he motor [to] be located at or near the middle of the device, otherwise a large protrusion would be necessary to keep the shaft in the center with the motor offset therefrom (and positioned in the protrusion). The arc also allows the push rod 14 to have a close clearance with the motor, as shown in FIGS. 22A and 22B and allows the outer housing to be smaller than similar prior art devices, therefore making the device 400 lower profile.

Id. at 15:2-10.

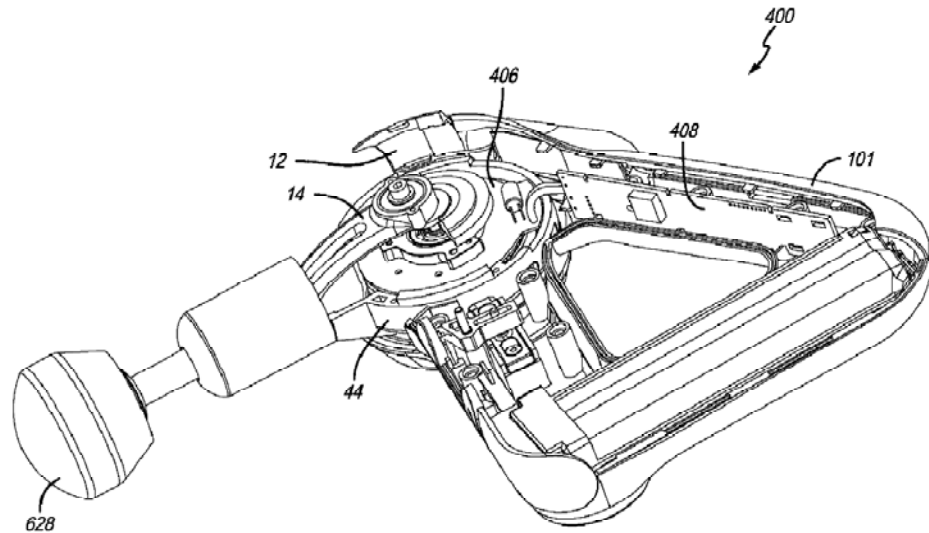


FIG. 21

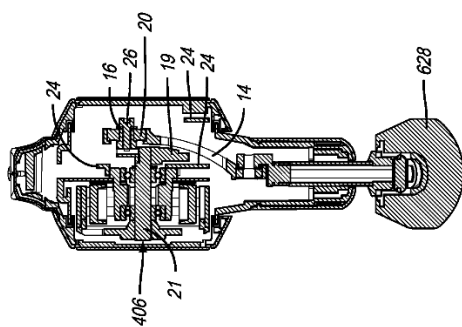


FIG. 22B

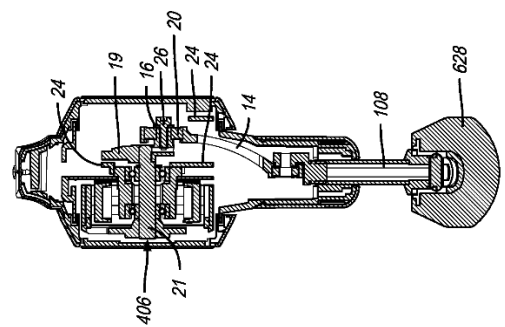
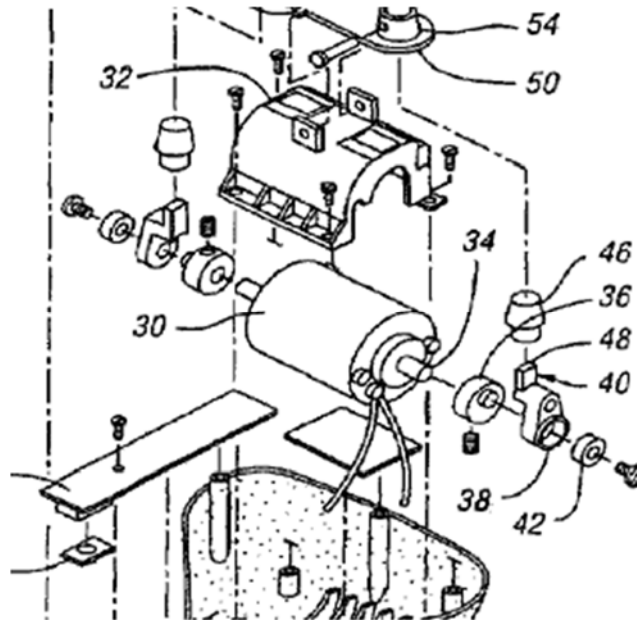
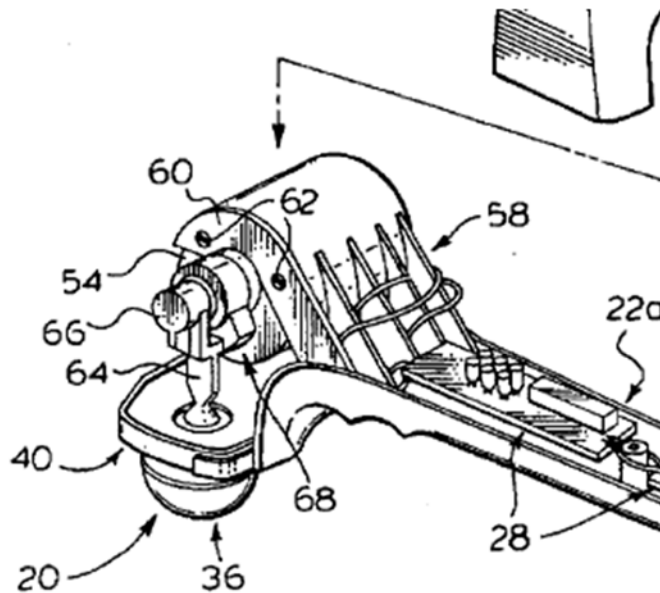


FIG. 22A

Therabody, however, did not invent this push rod design. Rather, use of a bent or curved (L-shaped or arc-shaped) push rod has been long known generally and in the field of percussive massages. For example, U.S. Patent No. 7,491,184 B2 to Huang (“Huang”) discloses an L-shaped connecting rod 40 connecting between an eccentric crank arm 36 and a stud 46. Huang at 3:28-60.

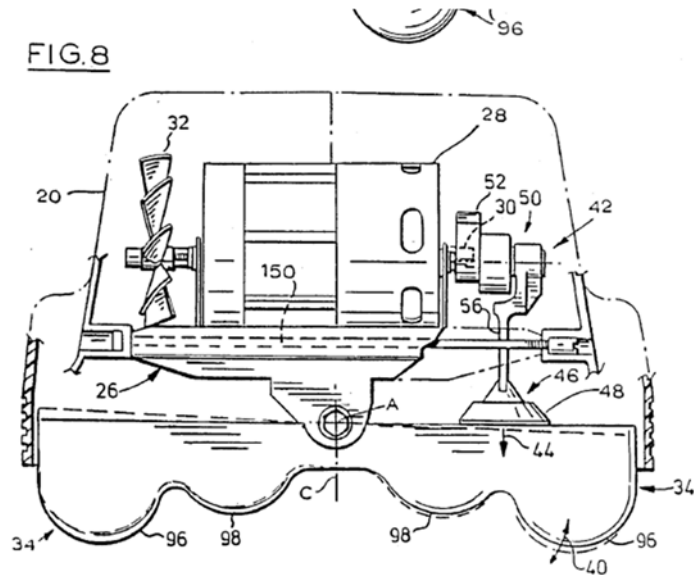


Similarly, U.S. Patent No. 5,716,332 to Noble ("Noble '332") illustrates an L-shaped link 64 between an eccentric counterbalance weight 68 and an annular disk 71. Noble '332 at 4:40-57.



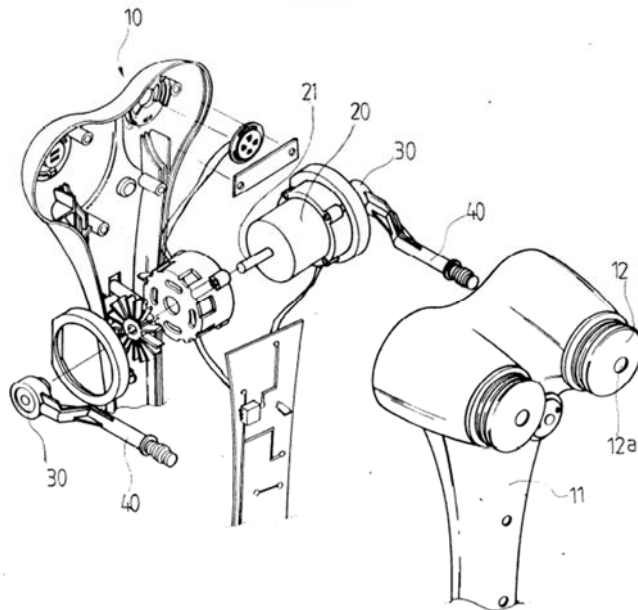
As another example, U.S. Patent No. 4,730,605 to Noble et al. ("Noble '605") illustrates an L-shaped connecting rod 56 between an eccentric 50 and the massage head 34. Noble '605 at 3:28-46.

FIG. 8



Numerous prior foreign patents and publications also describe an arc or L-shaped push rod before the effective filing date of the Asserted Claims. For example, KR200345192Y1 to Kim (“Kim”) illustrates an arc shape connecting rod 40 between an eccentric rotating shaft 30 and a massage head. Kim at ¶[25].

도면2



Hu '965 illustrates and describes a Z-shaped connecting rod 120 having a low end 122 connected to an eccentric shaft 140 and a high end 121 connected to a piston. Hu '965 explains that:

[T]he drive structure is located within the main body housing without protruding therefrom, allowing the top of the main body housing to be configured flush, resulting in a more compact structure and smaller volume for the main body; because the top of the main body housing is flush after installation, the overall appearance of the main body is more aesthetic.

Hu '965 at ¶¶[0009], [0027].

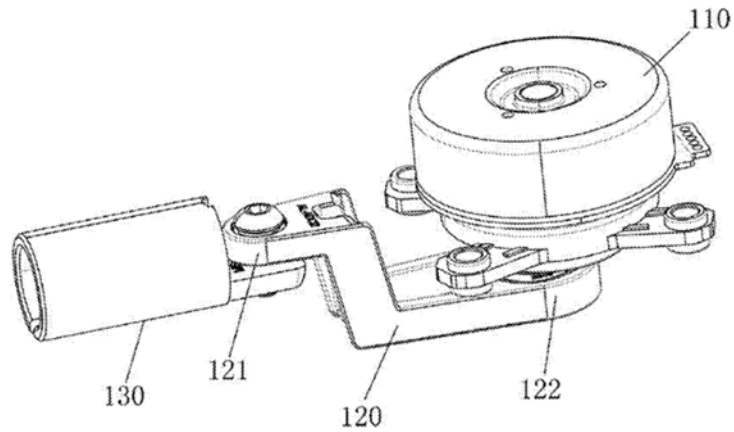


图 3

Other examples are numerous, including CN 206822844 U to Zhu (“Zhu”), which describes a drive mechanism for a massager comprising a linking arm 31 that is smaller where it connects to the eccentric shaft 22 and larger where it connects to the shaft 5.

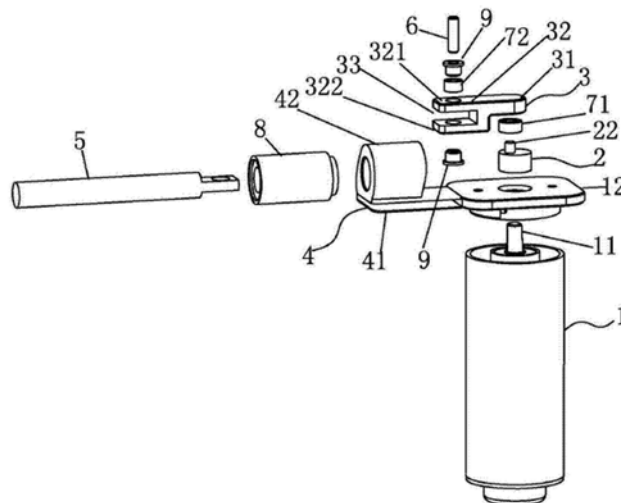
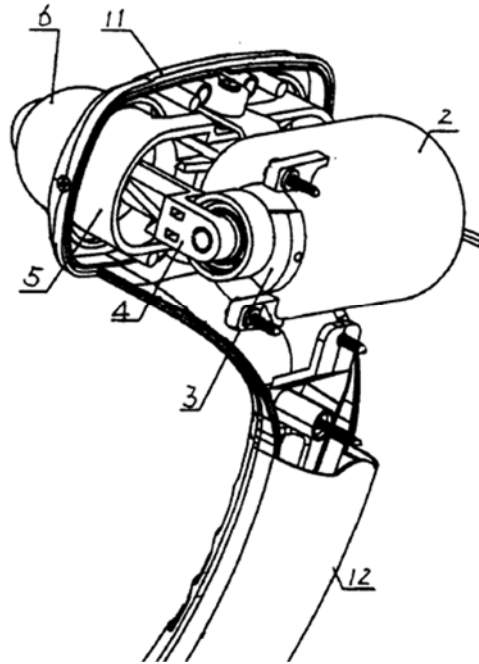


图4

1 Even further, CN2698334Y to Lixin (“Lixin”) also discloses an arc or L-
2 shaped connecting 4 between an eccentric wheel 3 and a hammer 5. Lixin at
3 ¶[0017].



16 These disclosures make clear that an arc or L-shaped connecting rod between
17 an eccentric shaft and a massage head in a percussive massager was not only well
18 known but would have been obvious to a POSITA. Before the effective filing date
19 of the Asserted Claims, a POSITA would have been motivated to use any of these
20 drive mechanisms in a percussive massager as a known suitable reciprocation
21 mechanism for converting the motor’s rotational output to reciprocal motion in the
22 attachment with a reasonable expectation of success. That the connecting rod was
23 arc or L-shaped would naturally provide a lower-profile device as described in Hu
24 ’965.

25 d) “Battery” References

26 The ’919 Patent recites claims directed to a battery housing in the handle (cl.
27 10, cl 16). This was well known in the art and represents nothing more than a
28 conventional placement of a power source in a portable percussive massage device.

Again, Pepe discloses that “[t]he motor is preferably powered by a rechargeable battery, which is preferably housed within one of the handles.” Pepe at ¶[0026]. Moreover, Hu ’965 discloses that the battery structure 300 includes a handheld housing 220 and a lithium-ion battery 211. Hu’ 965 at ¶[0041].

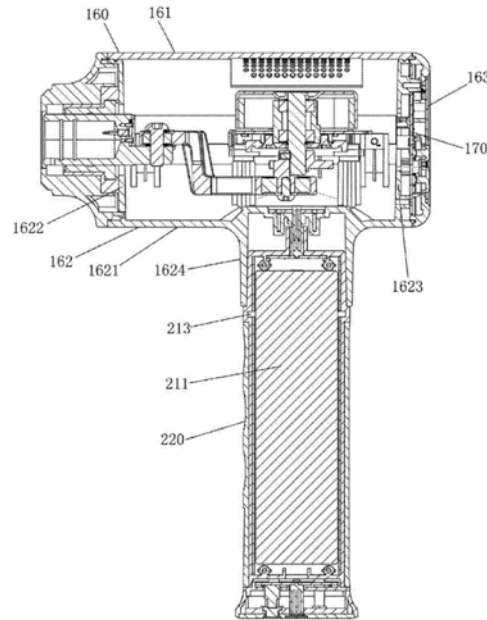


图 10

Accordingly, housing a battery, as a power source for the motor, in the handle was well known in percussive massage devices before the effective filing date of the Asserted Claim . Accordingly, it would have been obvious to a POSITA to include a battery in the handle as a known suitable location for a battery.

e) **“Switch” and “Display” References**

Others of the Asserted Claims recite features directed to a location and/or facing direction of a switch and display on the back of the device (cl. 7, cl. 8, cl. 12, cl. 13). The ’919 Patent does not purport to have invented a switch or display or placing them on the back of a percussive massager. Indeed, the rear of a percussive massager was a known suitable location for a switch and display before the effective filing date of the Asserted Claims.

For example, Marton describes that the rear of the percussive massage includes LEDs 166 and 168 for indicating speed and battery charge state,

1 respectively, and a central pushbutton switch 162 for controlling the motor. Marton
2 at 7:62-8:24.

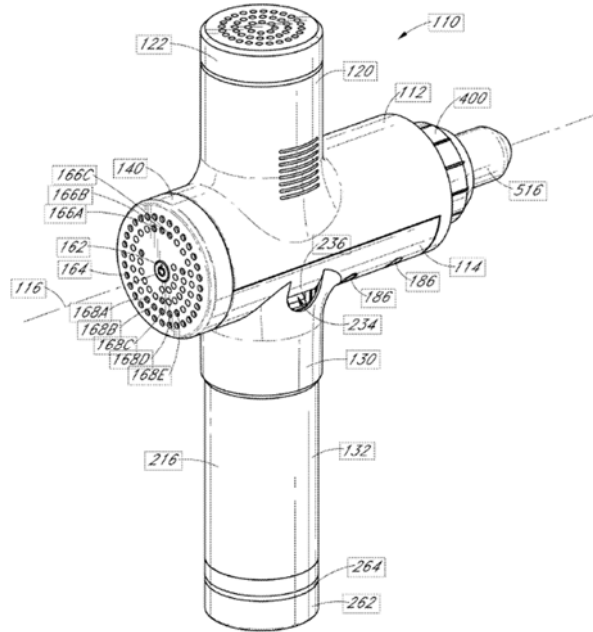


FIG. 2

17 As another example, CN 209933448 U to Wen (“Wen”) discloses a
18 percussive massager with a digital tube 26 as a display for displaying a number of
19 hits and a touch key for controlling the frequency on the rear of the device. Wen
20 at p. 4, ¶3.

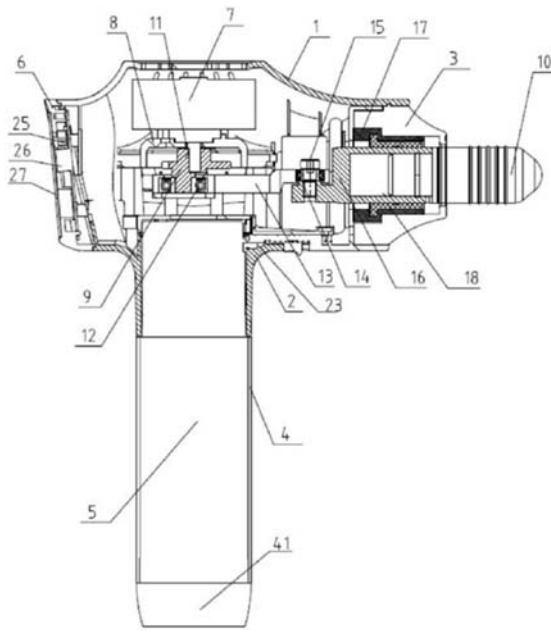


图4

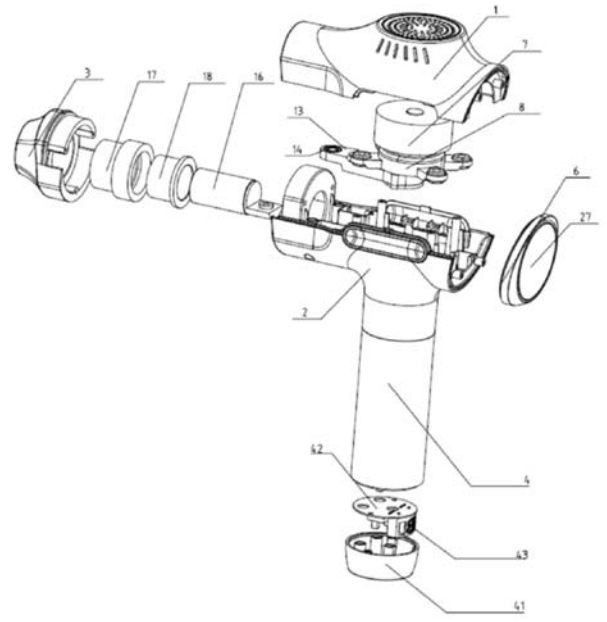


图5

Accordingly, it would have been obvious to a POSITA to include a switch and a display on a rear of a percussive massager device as a known suitable location for such components. Moreover, the rear of the device faces toward the user during use, making the rear the obvious location for information and interfaces designed for the user to view and interact with during use.

f) Remaining Claims/Features

The remaining Asserted Claims recite nothing more than generic features of percussive massagers. For example, claims 3, 14, and 19 recite that the handle extends longitudinally away from the reciprocation axis, claim 4 recites that a bearing is between two moving components, and claims 11 and 17 recite a multi-part housing. The '919 Patent does not purport to have invented any of these features, and as detailed in the appended claim charts, each of these features was well known prior to the effective filing date of the Asserted Claims. Accordingly, it would have been obvious to a POSITA to incorporate any of these conventional features into a percussive massager as a known suitable configuration for such devices.

Taken together, the Asserted Claims provide nothing more than a combination of known elements and configurations, each providing its normal and intended function to improve the device in a known manner, which is obvious. *KSR.*, 550 U.S. at 416 (“The combination of familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results.”). Further, it would have been obvious for a POSITA to try any and all of these known elements and configurations together or separately in various combinations with each acting in its designed manner to provide its intended function.

g) Well-Known Concept Chart

Discovery is ongoing and these contentions are preliminary. The following charts are provided to illustrate the well-known concepts recited in the Asserted Claims and the prior art references that disclosure and/or render obvious these concepts.

Concept Group	Claim Element Examples	Exemplary References that Render Obvious
“Device”	Claim 1: [pre]-[d], [g] - Claims 9, 11 Claim 2: [pre]-[c] - Claim 17 Claim 18: [pre]-[c]	- Marton - Pepe - Hu ’965 - Wen - Hypervolt⁷ - TimTam Power Massager⁸
“Angled Handle”	Claim 1: [f-3], [f-6] Claim 3	- Luger - Black

⁷ Including the product and associated YouTube video.

⁸ Including the product and associated YouTube video.

	Claim 2: [f] • Claim 14, 15 Claim 18: [f] • Claim 19, 20	• Elliott • Nguyen • Kumagai • Hu '829 • Pepe • Chuang • TimTam Power Massager
"Offset Push Rod"	Claim 1: [e]-[f-5] • Claims 4, 5, 6 Claim 2: [d]-[e], [g]-[j] Claim 18: [d]-[e], [g]-[j]	• Teranishi • Noble '605 • Noble '332 • Huang⁹ • Wersland • Hu '965 • Lixin • Zhu • Wen • Song • Kim • Takeda • Hypervolt • TimTam Power Massager • Thumper Mini Pro ¹⁰

⁹ Including US Patent No. 7,491,184 B2, US Publication No. 2001/0027280 A1, and US Publication No. 2003/0158505 A1.

¹⁰ Including the product and associated YouTube video.

1 2 3 4 5 6 7 8 9	“Battery”	Claim 10, 16	• Marton • Pepe • Wersland • Hu ’965 • Wen • Hypervolt • TimTam Power Massager
10 11 12 13 14	“Switch” and “Display”	Claims 7, 8, 12, 13	Marton Wersland Hu ’965 Wen Hypervolt

15 These are a preliminary identification subject to the reservations of rights
16 articulated above. Additionally, the absence of a particular reference from a group
17 is not an admission or suggestion that the reference does not disclose any particular
18 claim limitations. Furthermore, as explained in detail above and in the
19 accompanying charts, a skilled artisan would have had ample motivation to
20 combine the references in the manner described, and would have had every
21 expectation that such combinations would have been successful. Defendant
22 reserves the right to supplement and/or amend its contentions as discovery
23 progresses, and reserves the right to rely on expert discovery and testimony.

24 **E. Claim Charts**

25 Defendant provides the attached exemplary charts showing where and how
26 the prior art renders the asserted claims invalid. Defendant contends that each
27 reference identified below renders the Asserted Claims obvious alone (including
28 single reference obviousness) or in combination with the references listed in the

chart under 35 U.S.C. § 103. These are a preliminary identification subject to the reservations of rights articulated above. Additionally, any reference to a figure in cited text incorporates by reference the figure itself, and any citation to a figure incorporates by reference any description of that figure in a reference. Similarly, any reference to a cited part or portion of a document encompasses all figures and text within the cited page or portion. Defendant also reserves all rights to amend and supplement, including to rely upon additional documents and evidence as discovery continues. Nothing in Defendant's contentions or charts should be deemed as an admission. Defendant reserves all rights to rely upon documents, products, systems, devices, patents, and/or publications related to the art identified in these contentions.

Reference(s)	Chart
CN 109907965 A to Hu ("Hu '965")	A-1
US 2017/0304145 A1 to Pepe ("Pepe") ¹¹	A-2
US 2021/0022951 A1 to Hu ("Hu '951")	A-3
US 10,314,762 B1 to Marton et al. ("Marton") ¹²	A-4
CN 209933448 U to Wen ("Wen")	A-5
2018/0200141 A1 to Wersland et al. ("Wersland")	A-6
US 7,491,184 B2 to Huang ("Huang") ¹³	B-1
US 5,716,332 to Noble ("Noble '332")	B-2
US 4,730,605 to Noble ("Noble '605")	B-3
US 3,837,335 to Teranishi ("Teranishi")	B-4
KR 200345192Y1 to Kim ("Kim")	B-5

¹¹ Also applies to the TimTam PowerMassager system/device prior art.

¹² Also applies to Hyperice Hypervolt system/device prior art, in particular, with reference to the embodiment shown in Figures 25 and 26.

¹³ The disclosure of US 7,491,184 is similar to that of US 2001/0027280 A1 and US 2003/0158505 A1. Accordingly, US 2001/0027280 A1 and US 2003/0158505 A1 will not be separately charted.

EP 1964537 A1 to Takeda et al. (“Takeda”)	B-6
CN 209596176U to Song (“Song”)	B-7
CN 206822844 U to Zhu (“Zhu”)	B-8
CN 2698334Y to Lixin (“Lixin”)	B-9
US D895,829 S to Hu (“Hu ’829”)	C-1
US 2019/0159961 A1 to Chuang (“Chuang”)	C-2
US 1,245,860 to Black et al. (“Black”)	C-3
US 5,618,315 to Elliott (“Elliott”)	C-4
US 9,696,362 B2 to Nguyen et al. (“Nguyen”)	C-5
US 10,821,577 B2 to Kumagai et al. (“Kumagai”)	C-6

As explained above, Defendant reserves the right to amend these contentions and charts, including in light of discovery obtained from third parties and the construction of the claim terms. Defendant also reserves the right to rely on expert discovery and testimony.

Additionally, as noted above, these claim charts are based on Defendant’s current understanding of the claim constructions applied by Plaintiff, even though Defendant does not necessarily agree with those constructions, and reserves the right to dispute them. To the extent any limitation is deemed not to be met exactly by an item of prior art, Defendant contends that the difference would have been obvious to a person of ordinary skill in the art/or and within the knowledge of one skilled in the art as of the effective filing date of the Asserted Claims, so that the claimed invention would have been obvious both in light of the single reference alone and/or in light of combined references. Defendant does not admit or concede that such element is not expressly or inherently disclosed by the reference at issue.

As a general matter, all portions of each prior art item are relied upon to support the disclosure of each patent claim limitation, as all portions provide general support. Supporting citations are nevertheless provided but do not

1 necessarily represent every location where a particular claim element may be found
2 in the prior art item. Defendant reserves the right to rely on additional, or different,
3 portions of the prior art items other than those specifically cited in these claims
4 charts, and to supplement and/or amend these charts.

5 **F. Secondary Considerations**

6 Plaintiff bears the burden of establishing the existence of secondary
7 considerations and the requisite nexus to the claimed invention. *Prometheus Labs.*
8 *v. Roxane Labs.*, 805 F.3d 1092, 1102 (Fed. Cir. 2015); *In re GPAC*, 57 F.3d 1573,
9 1580 (Fed. Cir. 1995) (“For objective evidence to be accorded substantial weight,
10 its proponent must establish a nexus between the evidence and the merits of the
11 claimed invention.”). Although secondary considerations may be relevant to the
12 obviousness analysis, as the Federal Circuit has stated, secondary considerations of
13 nonobviousness “simply cannot overcome a strong *prima facie* case of
14 obviousness.” *Wyers v. Master Lock Co.*, 616 F.3d 1231, 1246 (Fed. Cir. 2010).

15 Plaintiff has not provided any evidence of any secondary considerations. Nor
16 has Plaintiff made any effort to establish a nexus between any asserted claim and
17 the secondary factors. The evidence also shows no long-felt but unsolved need,
18 failure of others, skepticism, copying, or unexpected results. Defendant is also not
19 aware of any evidence of praise of the alleged invention(s).

20 **IV. INVALIDITY UNDER 35 U.S.C. § 112**

21 Per Patent L.R. 3–3(d), and subject to Defendant’s reservation of rights,
22 Defendant identifies below the grounds upon which Defendants currently contend
23 the Asserted Claims are invalid for lack of written description and/or enablement
24 under 35 U.S.C. § 112(a) and/or for failing to comply with the definiteness
25 requirements of 35 U.S.C. § 112(b). The disclosures below do not attempt to
26 identify all recitations of a given term or phrase in each claim. Where Defendant
27 has identified an instance of a term or limitation in a particular claim that renders
28 the claim invalid under Section 112, Defendant contends that every instance of the

1 challenged term or limitation, or similar term or limitation, in the claim renders the
2 claim invalid for the same reasons.

3 Defendant reserves the right to assert additional grounds for invalidity under
4 35 U.S.C. § 112 in response to Plaintiff's claim interpretations, as well as to
5 supplement, modify, or amend these grounds based on any subsequent claim
6 construction rulings, the parties' positions during the claim-construction process,
7 or arguments advanced in this litigation. Defendant further reserves the right to
8 provide additional explanation and support for its Section 112 invalidity
9 contentions, including through expert testimony.

10
11
12 **A. Lack of Enablement and Written Description**

13 One or more of the Asserted Claims of the '919 Patent are invalid under 35
14 U.S.C. § 112(a) for failing to describe the invention "in such full, clear, concise,
15 and exact terms as to enable any person skilled in the art...to make and use the
16 same." *Id.* The specification must describe the claimed invention in sufficient
17 detail that a person of ordinary skill in the art would reasonably conclude that the
18 inventor possessed the claimed invention at the time of filing. *Ariad Pharms., Inc.*
19 *v. Eli Lilly & Co.*, 598 F.3d 1336, 1351 (Fed. Cir. 2010) (en banc).

20 The test for whether a specification adequately describes an invention is
21 "whether the disclosure of the application relied upon reasonably conveys to those
22 skilled in the art that the inventor had possession of the claimed subject matter as
23 of the filing date [T]he test requires an objective inquiry into the four corners
24 of the specification from the perspective of a person of ordinary skill in the art"
25 *Ariad Pharms., Inc. v. Eli Lilly and Co.*, 598 F. 3d 1336, 1351 (Fed. Cir. 2010) (en
26 banc); *Boston Scientific*, 647 F. 3d at 1362.

27 Section 112(a) also requires that the patent specification enable "those
28 skilled in the art how to make and use the full scope of the claimed invention

1 without ‘undue experimentation.’” *Genentech, Inc. v. Novo Nordisk A/S*, 108 F. 3d
2 1361, 1365 (Fed. Cir. 1997) (quoting *In re Wright*, 999 F. 2d 1557, 1561 (Fed. Cir.
3 1993)). “[T]he scope of the claims must be less than or equal to the scope of the
4 enablement.” *Nat’l Recovery Tech., Inc. v. Magnetic Separation Sys., Inc.*, 166 F.
5 3d 1190, 1196 (Fed. Cir. 1999).

6 Claims that depend from claims that are invalid for lack of written
7 description or enablement inherit those deficiencies and are likewise invalid.

8 Subject to Defendant’s reservation of rights, Defendant identifies the
9 following limitations of the Asserted Claims that are not enabled and/or lack
10 written description support:

- 11 • Claim 1: “a proximal end of the push rod assembly is connected to the
12 eccentric shaft at a location offset from the dividing plane in a first
13 direction”
- 14 • Claims 2 and 18: “the handle portion extends at an oblique angle to
15 the reciprocation axis and intersects ... the motor axis”
- 16 • Claim 9: “the common plane bisects the housing”
- 17 • Claim 10: “a battery housed in the handle portion”
- 18 • Claim 16: “a handle”
- 19 • Claims 11 and 17: “the housing comprises a first portion ... [and] a
20 second portion”

21 **B. Indefiniteness**

22 Claims are indefinite under 35 U.S.C. § 112(b) when they “fail to inform,
23 with reasonable certainty, those skilled in the art about the scope of the invention.”
24 *Nautilus, Inc. v. Biosig Instruments, Inc.*, 134 S. Ct. 2120, 2124 (2014).

25 At this time, Defendant does not submit that any claim term is indefinite.
26 However, the question whether a given claim term is indefinite may turn on claim
27 construction positions advocated and/or that will be advocated by Plaintiff
28 (including how Plaintiff applies or interprets any claim constructions).

1 Accordingly, Defendant reserves the right to amend or supplement these
2 contentions to account for the claim constructions provided by the Court or in view
3 of Plaintiff's proposed claim constructions.

4 **V. ACCOMPANYING DOCUMENT PRODUCTION**

5 Per Patent L.R. 3-4(a) and (c)-(e), responsive documents are highly
6 confidential and, therefore, will be produced once the Court enters a Protective
7 Order.

8 Per Patent L.R. 3-4(b), prior art and invalidity-related evidence may be found
9 at: HYPERICE003_0000001- HYPERICE003_0000650, which are produced
10 concurrently herewith. Defendant reserves the right to supplement and amend this
11 response, including as discovery continues.

12
13 DATED: July 6, 2026

PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP

14
15 By


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Hyper Ice, Inc.
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EXHIBIT A 1-5

Exhibit A-1
Claim Chart
U.S. Patent No. 12,396,919 in View of CN 109907965 A

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	CN 109907965 A to Hu (“Hu ’965”) discloses a deep myofascial impact massager and a massage structure located outside the main body. <i>See</i> Hu ’965, cl. 1; <i>id.</i> at [0009], [0034].
1[a]	a percussive therapy device comprising:	Hu ’965 discloses a deep myofascial impact massager. <i>See</i> Hu ’965, cl. 1; <i>id.</i> at [0009], [0034].
1[b]	a housing;	Hu ’965 discloses that a main body (100) comprising a housing (160). The housing (160) comprises an upper shell (161) and a lower shell (162). <i>See</i> Hu ’965 , cl. 1; <i>id.</i> at [0034], [0039].
1[c]	a handle portion;	Hu ’965 discloses a handheld housing (220) forming the graspable portion, the exterior of which is provided with an anti-slip portion (221). <i>See</i> Hu ’965 at [0019], [0041]; <i>id.</i> , Fig. 1.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Hu ’965 discloses a drive structure (110) including a drive motor (111) mounted inside the housing (160). The drive motor (111) has a drive shaft (112) that extends into the upper hollow mounting post of the eccentric transmission wheel. <i>See</i> Hu ’965 at [0038], [0039].
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in	Hu ’965 discloses an eccentric transmission wheel (140) having an upwardly protruding upper hollow mounting post (141) connected to the drive structure and a downwardly

	response to activation of the motor; and	protruding lower hollow mounting post (142) connected to the connecting rod. The centerlines of the upper hollow mounting post (141) and the lower hollow mounting post (142) are not on the same vertical line. <i>See</i> Hu '965, cl. 1–2; <i>id.</i> at [0011], [0037].
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Hu '965 discloses a Z-shaped connecting rod (120) whose low end is connected to the drive structure through the eccentric transmission wheel and whose high end is connected to a transmission shaft (130). The drive structure (110) drives the Z-shaped connecting rod to perform reciprocating back-and-forth motion through the eccentric transmission wheel (140), and the Z-shaped connecting rod (120) drives the transmission shaft (130) to perform reciprocating motion. <i>See</i> Hu '965, cl. 1; <i>id.</i> at [0009], [0034], [0040].
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Hu '965 discloses, expressly or inherently, that the transmission shaft (130) reciprocates in back-and-forth motion, which would be understood to be along a reciprocation axis. <i>See</i> Hu '965, cl. 1; <i>id.</i> at [0009], [0034], [0040].
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	Hu '965 discloses, expressly or inherently, that the transmission shaft (130) reciprocates on a dividing plane normal to the drive motor (110). <i>See</i> Hu '965 at [0015], [0034], [0038], [0039]; <i>id.</i>, Fig. 6. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-3], it would have been obvious to a POSITA as of the effective filing date of

		the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	Hu '965 discloses that the low end (122) of the Z-shaped connecting rod (120) is connected to the drive structure (110) through the lower hollow mounting post (142) of the eccentric transmission wheel (140) offset from the dividing plane in a first direction (e.g., toward the handheld housing (220)). <i>See</i> Hu '965, cl. 1–2; <i>id.</i> at [0034], [0037]; <i>id.</i> , Figs. 3, 4, 6.
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	Hu '965 discloses that the drive motor (111) extends from the dividing plane in a second direction (e.g., away from the handheld housing (220)). <i>See</i> Hu '965 at [0009], [0015], [0038], [0039]; <i>id.</i>, Fig. 1; <i>id.</i>, Fig. 6. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-5], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-6], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9,

		and/or C-1 to C-6.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Hu '965 discloses a massage head (300) detachably connected to the transmission shaft (130), the massage head being any one of a flat massage head, a round massage head, a fork-shaped massage head, a cone-shaped massage head, or a hot-compress massage head. <i>See</i> Hu '965, cl. 5; <i>id.</i> at [0010], [0035].
2[pre]	A percussive therapy device comprising:	<i>See</i> Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	<i>See</i> Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	Hu '965 discloses a Z-shaped connecting rod (120) connected to a transmission shaft (130) that performs reciprocating motion. <i>See</i> Hu '965, cl. 1; <i>id.</i> at [0009], [0010], [0034], [0035], [0040].
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that	Hu '965 discloses that the transmission shaft (130) performs reciprocating motion, understood to be along a reciprocation axis, driven by the Z-shaped connecting rod (120). The transmission shaft (130) is a hollow transmission shaft to which a massage head is detachably connected at least via the “two circles of grooves.” <i>See</i> Hu '965, cl. 1; <i>id.</i> at

	comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	[0009], [0010], [0034], [0035], [0040]. Hu '965 discloses, expressly or inherently, that the transmission shaft (130) is centered on the reciprocation axis, which would extend on a dividing plane.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	Hu '965 discloses that the Z-shaped connecting rod (120) has a low end (122) connected to the drive structure (110) through the eccentric transmission wheel (140) and a high end (121) connected to the transmission shaft (130). <i>See</i> Hu '965, cl. 1; <i>id.</i> at [0009], [0034].
2[e]	the dividing plane is normal to the motor axis,	Hu '965 discloses, expressly or inherently, that the dividing plane is normal to the motor axis of the drive motor (111). <i>See</i> Hu '965, Fig. 6.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[f], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
2[g]	the motor is located on a first side of the dividing plane,	Hu '965 discloses that the drive motor (111) is located on a first side of the dividing plane (e.g., above with respect to the handheld housing (220)). <i>See</i> Hu '965, Figs. 6, 10.
2[h]	the device includes an eccentric shaft	Hu '965 discloses an eccentric transmission wheel (140) having an upper hollow mounting

	that is configured to travel in a circle about the motor axis when the motor is active,	post (141) connected to the drive structure and a downwardly protruding lower hollow mounting post (142) connected to the connecting rod, the centerlines of which are not on the same vertical line. <i>See</i> Hu '965, cl. 1–2; <i>id.</i> at [0011], [0037].
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	Hu '965 discloses that the low end (122) of the Z-shaped connecting rod (120) is connected to the drive structure (110) through the downwardly protruding lower hollow mounting post (142) of the eccentric transmission wheel (140), while the drive shaft (112) is connected at the upwardly protruding upper hollow mounting post (141). <i>See</i> Hu '965, cl. 1–2; <i>id.</i> at [0034], [0037]; <i>id.</i>, Figs. 3, 4, 6. Hu '965 discloses that the low end (122) of the Z-shaped connecting rod (120) is coupled to the lower hollow mounting post (142) of the eccentric transmission wheel (140) on a second side of the dividing plane (e.g., below with respect to the handheld housing (220)). <i>See</i> Hu '965, Fig. 6.
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	Hu '965 discloses that the Z-shaped connecting rod (120) has one high end (121) and one low end, with the low end (122) being farther from the reciprocation axis than the high end (121) is. <i>See</i> Hu '965, cl. 1–2; <i>id.</i> at [0011], [0037]; <i>id.</i> , Figs. 3, 4, 6.
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the	Hu '965 discloses that the handheld housing (220) extends away from reciprocation axis. <i>See</i> Hu '965 at [0034], [0041]; <i>id.</i> , Figs. 1, 6.

	reciprocation axis.	
4	The percussive therapy system of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	Hu '965 discloses at least in the illustrations a bearing between the downwardly protruding lower hollow mounting post (142) of the eccentric transmission wheel (140) and the low end (122) of the Z-shaped connecting rod (120). See Hu '965, cl. 2; <i>id.</i> at [0011], [0037], Figs. 4, 6, and 10. Hu '965 also discloses, expressly or inherently, that the transmission shaft (130) is centered on the reciprocation axis. See Hu '965, cl. 2; <i>id.</i> at [0011], [0037], Figs. 5, 6, and 10. Hu '965 also discloses that the bearing (illustrated) and the drive motor (111) are positioned on opposite sides of the reciprocation axis. See Hu '965 at [0037]; <i>id.</i>, Fig. 6.
5	The percussive therapy system of claim 4¹, wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal	Hu '965 discloses the Z-shaped connecting rod (120) having a low end (122) coupled to the bearing (as illustrated) and a high end (121) coupled to the transmission shaft (130). The low end (122) of the Z-shaped connecting rod (120) is farther from the reciprocation axis than the high end (121) is. See Hu '965, cl. 1–2; <i>id.</i> at [0011], [0034], [0037]; <i>id.</i>, Figs. 3, 4, 6, 10.

¹ Per April 21, 2026, Certificate of Correction.

	end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	
6	The percussive therapy system of claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	See Claim Ref. 5, which is incorporated herein.
7	The percussive therapy system of claim 1, wherein the device comprises a switch for activating the motor, and the switch is located on a portion of the housing that faces an opposite direction from a distal end of the push rod assembly.	Hu '965 discloses a main power switch (241) disposed on the bottom of the base (240) of the battery structure. See Hu '965 at [0021], [0025], [0027], [0041], [0046]; <i>id.</i>, Fig. 1. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 7, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9,

² See fn. 1.

		and/or C-1 to C-6.
8	The percussive therapy system of claim 1, wherein the device comprises a switch and an electronic display that faces a same direction as the switch, wherein the switch is configured for activating the motor.	Hu '965 discloses a light guide plate (230) connected to a power detection unit that displays different colors based on the battery level (power display), and a main power switch (241), both disposed on the base (240)/battery structure of the device. <i>See</i> Hu '965 at [0019], [0020], [0021], [0027]. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 8, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
9	The percussive therapy system of claim 1, wherein the handle portion extends along a handle portion axis, the reciprocation axis and the handle portion axis both lie on a common plane, and the common plane bisects the housing.	Hu '965 discloses a handheld housing (220) that would be understood to extend along a handle portion axis. Hu '965 also discloses, expressly or inherently, the reciprocation axis and the handle portion axis both lie on a common plane that bisects the housing (160). <i>See</i> Hu '965 at [0039], [0041]; <i>id.</i> , Figs. 1, 6, 10.
10	The percussive therapy system of claim 1, comprising a battery housed in	Hu '965 discloses a battery assembly (210) comprising a lithium-ion battery (211) located within the handheld housing (220). <i>See</i> Hu '965 at [0027], [0041]; <i>id.</i> , Figs. 1, 6, 10.

	the handle portion.	
11	The percussive therapy system of claim 1, wherein the housing comprises a first portion that extends away from the handle portion and encloses a portion of the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	Hu '965 discloses that the housing (160) comprises a lower shell (161) extending away from the handheld housing (220) and enclosing at least the low end (122) of the Z-shaped connecting rod (120) and an upper shell (161) that extends away from the handheld housing (220) and the lower shell (161). <i>See</i> Hu '965, cl. 6; <i>id.</i> at [0015], [0017], [0039], [0040]; Figs. 1, 6, and 10.
12	The percussive therapy device of claim 2, comprising a backward facing electronic display and a backward facing switch configured to activate the motor.	<i>See</i> Claim Ref. 8, which is incorporated herein.
13	The percussive therapy device of claim 2 ³ , comprising a switch configured to activate the motor, wherein the switch is located on a	<i>See</i> Claim Ref. 7, which is incorporated herein.

³ *See* fn. 1.

	portion of the housing that faces an opposite direction from the distal end of the output shaft.	
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Claim Ref. 3, which is incorporated herein.</i>
15	The percussive therapy device of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See Claim Ref. 1[f-6], which is incorporated herein.</i>
16	The percussive therapy device of claim 2, comprising a battery and a handle, wherein the handle comprises the handle portion and the battery is housed in the handle.	<i>See Claim Ref. 10, which is incorporated herein.</i>
17	The percussive therapy device of claim 2, wherein the housing	<i>See Claim Ref. 11, which is incorporated herein.</i>

	comprises a first portion that extends away from the handle portion and encloses the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	
18[pre] ⁴	A percussive therapy device comprising:	See Claim Ref. 2[pre], which is incorporated herein.
18[a]	a motor configured to output torque about a motor axis;	See Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	See Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	See Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	See Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a	See Claim Ref. 2[d-1], which is incorporated herein.

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	<i>See Claim Ref. 2[d-2], which is incorporated herein.</i>
18[e]	the dividing plane is normal to the motor axis,	<i>See Claim Ref. 2[e], which is incorporated herein.</i>
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	<i>See Claim Ref. 2[f], which is incorporated herein.</i>
18[g]	the motor is located on a first side of the dividing plane,	<i>See Claim Ref. 2[g], which is incorporated herein.</i>
18[h]	the device includes an eccentric shaft that is configured to travel in a circle	<i>See Claim Ref. 2[h], which is incorporated herein.</i>

	about the motor axis when the motor is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	See Claim Ref. 2[i], which is incorporated herein.
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	Hu '965 discloses that the Z-shaped connecting rod (120) has a low end (122) coupled to the lower hollow mounting post (142) of the eccentric transmission wheel (140) and a high end (121) connected to the transmission shaft (130). The location where the low end (122) of the Z-shaped connecting rod (120) is coupled to the lower hollow mounting post (142) of the eccentric transmission wheel (140) is farther from the reciprocation axis than the location where the high end (121) of the Z-shaped connecting rod (120) is connected to the transmission shaft (130). See Hu '965, cl. 1–2; <i>id.</i> at [0011], [0037]; <i>id.</i> , Figs. 3, 4, 6, 10.
19	The percussive therapy device	See Claim Ref. 3, which is incorporated herein.

	of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See Claim Ref. 1[f-6], which is incorporated herein.</i>

Exhibit A-2
Claim Chart
U.S. Patent No. 12,396,919 in View of US 2017/0304145 A1

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	US 2017/0304145 A1 to Pepe (“Pepe”) discloses an electronic handheld massage device (10) in which the motion imparted to the shaft (18) and the applicator head (30) is pulsating, longitudinal to-and-fro motion that is part of percussive massage therapy. <i>See</i> Pepe at [0026]; <i>id.</i> , cl. 1, 17.
1[a]	a percussive therapy device comprising:	Pepe discloses an electronic handheld massage device (10) that provides percussive massage therapy. <i>See</i> Pepe at [0026]; <i>id.</i> , cl. 1, 17.
1[b]	a housing;	Pepe discloses an outer body (11), a unitary piece preferably made of a hard plastic material. <i>See</i> Pepe at [0024]; <i>id.</i> , cl. 1.
1[c]	a handle portion;	Pepe discloses a pair of substantially parallel handles, a primary handle (12) and a secondary handle (14), each comprising a gripping portion. <i>See</i> Pepe at [0006], [0024]; <i>id.</i> , cl. 1.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Pepe discloses a motor unit (20) housing a motor which drives the shaft. The motor unit (20) extends through the outer body (11) of the device (10). <i>See</i> Pepe at [0006], [0026]; <i>id.</i> , Figs. 1-8.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to	Pepe discloses that the motor drives the shaft (18), and that the motion outputted by the motor is transmitted to the shaft by means of gears, or the like. The motion transmitted to

	activation of the motor; and	the shaft is rotary motion. <i>See</i> Pepe at [0006], [0026]. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[e], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Pepe discloses, expressly or inherently, a push rod assembly operatively connected to the motor, that imparts pulsating, longitudinal to-and-fro motion to the shaft (18). <i>See</i> Pepe at [0025], [0026]; <i>id.</i>, cl. 17. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-1], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Pepe discloses a shaft (18), driven by the motor, that imparts pulsating, longitudinal to-and-fro motion, and a free extremity of the shaft that extends beyond the shaft unit (16). It would be understood that the shaft (18) reciprocates along a reciprocation axis. <i>See</i> Pepe at [0025], [0026]; <i>id.</i>, cl. 17; <i>id.</i>, Figs. 1-8.

1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	Pepe discloses that the shaft (18) is substantially perpendicular to the pair of handles, and that the motor unit (20) extends perpendicular to the shaft (18) and the pair of handles (12, 14). <i>See</i> Pepe at [0006], [0026]; <i>id.</i> , cl. 1; <i>id.</i> , Figs. 1-8.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	Pepe discloses that the motor drives the shaft (18) and that the motion outputted by the motor is transmitted to the shaft by means of gears, or the like, with the motor unit (20) extending perpendicular to the shaft (18). <i>See</i> Pepe at [0006], [0026]. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-4], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	Pepe discloses that the motor unit (20) extends perpendicular to the shaft (18) and the pair of handles (12, 14). <i>See</i> Pepe at [0026]; <i>id.</i> , cl. 5; <i>id.</i> , Figs. 1-4.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	Pepe discloses that an interior angle between at least a portion of the primary handle (12) and the shaft (18) is obtuse. <i>See</i> Pepe, Figs. 1-4.

		To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-6], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Pepe discloses a massage head (30) removably fitted to the free extremity of the shaft (18), whereby the motion of the shaft is imparted to the massage head. <i>See</i> Pepe at [0008], [0028]; <i>id.</i> , cl. 1.
2[pre]	A percussive therapy device comprising:	<i>See</i> Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	<i>See</i> Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	Pepe discloses a shaft (18) driven by the motor and imparting pulsating, longitudinal to-and-fro motion, the shaft having a free extremity that extends beyond the shaft unit (16) and is

		removably fitted with a massage head (30). <i>See</i> Pepe at [0025], [0026], [0028]; <i>id.</i>, cl. 17; <i>id.</i>, Figs. 1-9D. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[d], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	Pepe discloses a shaft (18) driven by the motor and imparting pulsating, longitudinal to-and-fro motion, the shaft having a free extremity that extends beyond the shaft unit (16) and is removably fitted with a massage head (30). <i>See</i> Pepe at [0025], [0026], [0028]; <i>id.</i>, cl. 17; <i>id.</i>, Figs. 1-9D. It would be understood that the shaft (18) is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane. <i>See</i> Pepe, Figs. 1-8.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to	Pepe discloses that the motor drives the shaft (18) and that the motion outputted by the motor is transmitted to the shaft by means of gears, or the like. <i>See</i> Pepe at [0006], [0026]. To the extent the primary reference does not

	the output shaft; wherein:	disclose and/or render obvious the entirety of Claim Ref. 2[d-2], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
2[e]	the dividing plane is normal to the motor axis,	Pepe discloses that the motor unit (20) extends perpendicular to the shaft (18) and the pair of handles. See Pepe at [0006], [0026]; <i>id.</i>, Figs. 1-8. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[e], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	Pepe discloses that at least a portion of the primary handle (12) extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis. See Pepe, Figs. 1-4. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[f], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9,

		and/or C-1 to C-6.
2[g]	the motor is located on a first side of the dividing plane,	Pepe discloses that the motor unit (20) is located on a first side of the dividing plane (e.g., to the right in Fig. 6). Pepe, Figs. 1-8.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	Pepe discloses that the motor drives the shaft (18) and that the motion outputted by the motor is transmitted to the shaft by means of gears, or the like, the motion transmitted to the shaft being rotary motion. See Pepe at [0006], [0026]. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[h], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	Pepe discloses that the motor drives the shaft (18) and that the motion outputted by the motor is transmitted to the shaft by means of gears, or the like, with the motor unit (20) extending perpendicular to the shaft. See Pepe at [0006], [0026]. The proximal end of the push rod would be understood to be coupled on a second side of the dividing plate (e.g., to the left in Fig. 6). See Pepe, Figs. 1-8. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[i], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or

		secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[j], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	Pepe discloses that the handles (12, 14) extend between from reciprocation axis. See Pepe at [0006], [0024], [0025]; <i>id.</i> , Figs. 1–4.
4	The percussive therapy system of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of	As to the connection between the motor and the shaft, Pepe discloses that the motor drives the shaft (18) and that the motion outputted by the motor is transmitted to the shaft by means of gears, or the like. See Pepe at [0006], [0026]. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 4, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.

	the reciprocation axis.	
5	The percussive therapy system of claim 4 ¹ , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 5, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
6	The percussive therapy system of claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther	See Claim Ref. 5, which is incorporated herein.

¹ Per April 21, 2026, Certificate of Correction.

² See fn. 1.

	from the reciprocation axis than the distal end of the push rod is.	
7	The percussive therapy system of claim 1, wherein the device comprises a switch for activating the motor, and the switch is located on a portion of the housing that faces an opposite direction from a distal end of the push rod assembly.	Pepe discloses a trigger (26) secured to the primary handle (12) closer to the top extremity thereof and disposed in operative communication with the motor such that actuating the trigger activates the motor, and a toggle switch (28) for changing the operational mode of the motor. See Pepe at [0007], [0027]; <i>id.</i>, cl. 1, 3; <i>id.</i>, Figs. 1, 4. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 7, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
8	The percussive therapy system of claim 1, wherein the device comprises a switch and an electronic display that faces a same direction as the switch, wherein the switch is configured for activating the motor.	Pepe discloses a trigger (26) disposed in operative communication with the motor such that actuating the trigger activates the motor, and a toggle switch (28) for changing the operational mode of the motor, both disposed on the primary handle (12) region of the device. See Pepe at [0007], [0027]; <i>id.</i>, Figs. 1, 4. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 8, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or

		secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
9	The percussive therapy system of claim 1, wherein the handle portion extends along a handle portion axis, the reciprocation axis and the handle portion axis both lie on a common plane, and the common plane bisects the housing.	Pepe discloses the reciprocation axis and the handle portion axis of at least the primary handle (12) both lie on a common plane, and the common plane bisects the outer body (11). <i>See</i> Pepe at [0006], [0025]; <i>id.</i> , Figs. 1-8.
10	The percussive therapy system of claim 1, comprising a battery housed in the handle portion.	Pepe discloses that the motor is powered by a rechargeable battery, which is preferably housed within one of the handles. <i>See</i> Pepe at [0026]; <i>id.</i> , cl. 2.
11	The percussive therapy system of claim 1, wherein the housing comprises a first portion that extends away from the handle portion and encloses a portion of the push rod assembly, and the housing comprises a second portion that extends away from the handle portion	Pepe discloses a shaft unit (16) that overlies the top extremities of the pair of handles and houses the shaft (18). The shaft unit (16) has two pieces (<i>e.g.</i> , left and right pieces) that extend away from the handles (12, 14). <i>See</i> Pepe at [0025], [0026]; <i>id.</i> , cl. 1.

	and the first portion.	
12	The percussive therapy device of claim 2, comprising a backward facing electronic display and a backward facing switch configured to activate the motor.	<i>See Claim Ref. 8, which is incorporated herein.</i>
13	The percussive therapy device of claim 2 ³ , comprising a switch configured to activate the motor, wherein the switch is located on a portion of the housing that faces an opposite direction from the distal end of the output shaft.	<i>See Claim Ref. 7, which is incorporated herein.</i>
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Claim Ref. 3, which is incorporated herein.</i>

³ See fn. 1.

15	The percussive therapy device of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	See Claim Ref. 1[f-6], which is incorporated herein.
16	The percussive therapy device of claim 2, comprising a battery and a handle, wherein the handle comprises the handle portion and the battery is housed in the handle.	See Claim Ref. 10, which is incorporated herein.
17	The percussive therapy device of claim 2, wherein the housing comprises a first portion that extends away from the handle portion and encloses the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	See disclosure for Claim Ref. 11, which is incorporated herein.

18[pre] ⁴	A percussive therapy device comprising:	<i>See disclosure for Claim Ref. 2[pre], which is incorporated herein.</i>
18[a]	a motor configured to output torque about a motor axis;	<i>See disclosure for Claim Ref. 2[a], which is incorporated herein.</i>
18[b]	a handle portion extending along a handle portion axis;	<i>See disclosure for Claim Ref. 2[b], which is incorporated herein.</i>
18[c]	a housing; and	<i>See disclosure for Claim Ref. 2[c], which is incorporated herein.</i>
18[d]	a push rod assembly comprising:	<i>See disclosure for Claim Ref. 2[d], which is incorporated herein.</i>
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	<i>See disclosure for Claim Ref. 2[d-1], which is incorporated herein.</i>
18[d-2]	a push rod having a	<i>See disclosure for Claim Ref. 2[d-2], which is</i>

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	<i>See disclosure for Claim Ref. 2[e], which is incorporated herein.</i>
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	<i>See disclosure for Claim Ref. 2[f], which is incorporated herein.</i>
18[g]	the motor is located on a first side of the dividing plane,	<i>See disclosure for Claim Ref. 2[g], which is incorporated herein.</i>
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	<i>See disclosure for Claim Ref. 2[h], which is incorporated herein.</i>
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled	<i>See disclosure for Claim Ref. 2[i], which is incorporated herein.</i>

	to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 18[j], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Claim Ref. 3, which is incorporated herein.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle	See Claim Ref. 1[f-6], which is incorporated herein.

	portion and the output shaft is obtuse.	
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Exhibit A-3
Claim Chart
U.S. Patent No. 12,396,919 in View of U.S. 2021/0022951 A1

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	US 2021/0022951 A1 to Hu (“Hu ’951”) discloses a hand-held muscle massager in which the driving motor drives a piston-type moving head (120) to reciprocate a massage head (20) at high speed, and the massage head (20) repeatedly hits the human body to massage the muscles. <i>See</i> Hu ’951 at [0042], [0077]; <i>id.</i> , cl. 1–2.
1[a]	a percussive therapy device comprising:	Hu ’951 discloses a hand-held muscle massager in which the driving motor drives a piston-type moving head (120) to reciprocate a massage head (20) at high speed, and the massage head (20) repeatedly hits the human body to massage the muscles. <i>See</i> Hu ’951 at [0042], [0077]; <i>id.</i> , cl. 1–2.
1[b]	a housing;	Hu ’951 discloses a massage body (10) connected with the main handle (30) and auxiliary handle (40) to form an integral body. <i>See</i> Hu ’951 at [0026], [0030], [0038]; <i>id.</i> , cl. 1; <i>id.</i> , Figs. 3, 5.
1[c]	a handle portion;	Hu ’951 discloses a main handle (30). <i>See</i> Hu ’951 at [0026], [0030]; <i>id.</i> , cl. 1.
1[d]	a motor positioned in the housing and	Hu ’951 discloses a driving motor (110) having an output shaft on which a cam (112) is

	configured to output torque about a motor axis;	sleeved, the driving motor being disposed in the main handle inner cavity (63) or the auxiliary handle inner cavity (64). <i>See</i> Hu '951 at [0038], [0045], [0062]; <i>id.</i> , Figs. 3, 5.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	Hu '951 discloses a cam (112) sleeved on the output shaft of the driving motor (110), one end of the rigid connecting rod being fixedly locked on the cam (112). <i>See</i> Hu '951 at [0062]; <i>id.</i> , cl. 6; <i>id.</i> , Figs. 7–9.
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Hu '951 discloses a connecting rod assembly (130), which is a rigid connecting rod, connected between the driving motor (110) and a piston-type moving head (120); the driving motor drives the piston-type moving head (120) via the connecting rod assembly (130) to reciprocate at high speed in the motion opening (62). <i>See</i> Hu '951 at [0038], [0042], [0062]; <i>id.</i> , cl. 2, 6; <i>id.</i> , Figs. 7–9.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Hu '951 discloses that the connecting rod assembly (130) reciprocates at high speed, which is understood to occur along a reciprocation axis. <i>See</i> Hu '951 at [0038], [0042], [0062]; <i>id.</i> , cl. 2, 6; <i>id.</i> , Figs. 7–9.
1[f-3]	the reciprocation axis extends transverse to the	Hu '951 discloses that the piston-type moving head (120) reciprocates in the motion opening (62) at the front end of the massage body

	handle portion on a dividing plane normal to the motor axis,	while the main handle (30) forms a main angle (51) with the massage body that is greater than 90° and less than or equal to 135°. <i>See</i> Hu '951 at [0034], [0036],[0042], [0045], [0062]; <i>id.</i> , Figs. 5–9.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	Hu '951 discloses that one end of the connecting rod (130) is connected to the cam (112) at a location offset from the dividing plane in a first direction (e.g., toward the main handle (30)). <i>See</i> Hu '951 at [0062]; <i>id.</i>, cl. 6; <i>id.</i>, Figs. 7–9. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-4], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	Hu '951 discloses that the driving motor (110) extends transverse to the main handle (30) and away from the dividing plane in a second direction (e.g., away from the main handle (30)). <i>See</i> Hu '951 at [0045]; <i>id.</i> , Figs. 5–6.
1[f-6]	an interior angle defined between the handle portion and the output shaft is	Hu '951 discloses that a main angle (51) between the massage body (10) and the main handle (30) is greater than 90° and less than or equal to 135°. <i>See</i> Hu '951 at [0032], [0034];

	obtuse; and	<i>id.</i> , Figs. 5–6.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Hu '951 discloses a massage head (20) removably assembled on the piston-type moving head (120), including, in one embodiment, via a detachable connection unit (300) comprising a plug (310). <i>See</i> Hu '951 at [0041], [0065], [0067]; <i>id.</i> , cl. 7; <i>id.</i> , Figs. 5–9.
2[pre]	A percussive therapy device comprising:	<i>See</i> Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	<i>See</i> Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	Hu '951 discloses a connecting rod assembly (130), which is a rigid connecting rod, one end of which is fixedly locked on the cam (112) on the motor output shaft and the other end of which is pivoted on a piston-type moving head (120). <i>See</i> Hu '951 at [0042], [0065]; <i>id.</i> , cl. 2, 7; <i>id.</i> , Figs. 5–9.

2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	Hu '951 discloses that the piston-type moving head (120) reciprocates at high speed in the motion opening (62), the massage head (20) being assembled on the piston-type moving head, by example, via a detachable connection unit (300). <i>See</i> Hu '951 at [0042], [0065]; <i>id.</i> , cl. 2, 7; <i>id.</i> , Figs. 5–9.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	Hu '951 discloses that the connecting rod assembly (130) has one end connected to the cam (112) on the motor output shaft and the other end pivotably connected to the piston-type moving head (120). <i>See</i> Hu '951 at [0042], [0062]; <i>id.</i> , cl. 6; <i>id.</i> , Figs. 5–9.
2[e]	the dividing plane is normal to the motor axis,	Hu '951 is understood to disclose that the dividing plane is normal to the motor axis. <i>See</i> Hu '951, Figs. 5–9.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis	Hu '951 discloses that the main handle (30) extends at an angle greater than 90° and less than or equal to 135° with respect to the reciprocation axis and intersects the

	and intersects the reciprocation axis and the motor axis,	reciprocation axis and the motor axis. <i>See</i> Hu '951 at [0036]; <i>id.</i> , Figs. 5–6.
2[g]	the motor is located on a first side of the dividing plane,	Hu '951 discloses that the driving motor (110) is located on a first side of the dividing plane (e.g., away from the main handle (30)). <i>See</i> Hu '951 at [0036]; <i>id.</i> , Figs. 5–6.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	Hu '951 discloses a cam (112) sleeved on the output shaft of the driving motor (110). <i>See</i> Hu '951 at [0062]; <i>id.</i> , cl. 6; <i>id.</i> , Figs. 7–9.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	Hu '951 discloses that one end of the connecting rod is connected to the cam (112) on a second side of the dividing plane (e.g., toward the main handle (30)). <i>See</i> Hu '951 at [0062]; <i>id.</i> , cl. 6; <i>id.</i> , Figs. 7–9.
2[j]	the proximal end of the push rod is	To the extent the primary reference does not disclose and/or render obvious the entirety of

	farther from the reciprocation axis than the distal end is.	Claim Ref. 2[j], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	Hu '951 discloses that the main handle (30) extends away from the reciprocating piston-type moving head (120). <i>See</i> Hu '951 at [0028], [0030]; <i>id.</i> , Figs. 3–6.
4	The percussive therapy system of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	Hu '951 discloses, at least in the illustrations, a bearing between the cam (112) and the connecting rod assembly (130). The bearing and the motor are on opposite sides of the reciprocation axis. <i>See</i> Hu '951, Figs. 5–9.

5	The percussive therapy system of claim 4¹, wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 5, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
6	The percussive therapy system of claim 4², wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the	See Claim Ref. 5, which is incorporated herein.

¹ Per April 21, 2026, Certificate of Correction.

² See fn. 1.

	reciprocation axis than the distal end of the push rod is.	
7	The percussive therapy system of claim 1, wherein the device comprises a switch for activating the motor, and the switch is located on a portion of the housing that faces an opposite direction from a distal end of the push rod assembly.	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 7, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
8	The percussive therapy system of claim 1, wherein the device comprises a switch and an electronic display that faces a same direction as the switch, wherein the switch is configured for activating the motor.	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 8, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
9	The percussive therapy system of claim 1, wherein the handle portion	Hu '951 discloses, at least in the illustrations, that the axis of the main handle (30) and the reciprocation axis lie on a common plane that bisects the massage body (10). See Hu '951 at

	extends along a handle portion axis, the reciprocation axis and the handle portion axis both lie on a common plane, and the common plane bisects the housing.	[0034], [0038], [0042]; <i>id.</i> , Figs. 3–5.
10	The percussive therapy system of claim 1, comprising a battery housed in the handle portion.	Hu '951 discloses a battery assembly (140) that may be provided in the main handle inner cavity (63). <i>See</i> Hu '951 at [0044], [0045]; <i>id.</i> , cl. 3; <i>id.</i> , Fig. 5.
11	The percussive therapy system of claim 1, wherein the housing comprises a first portion that extends away from the handle portion and encloses a portion of the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	Hu '951 discloses a massage body (10) having a handle connecting end (12) that encloses the piston-type moving head (120) and connecting rod assembly (130) and extends away from the main handle (30) and a massage head assembling end (11) that extends away from the handle connecting end (12) and the main handle (30). . <i>See</i> Hu '951 at [0027], [0028], [0038], [0045]; <i>id.</i> , Figs. 3, 5, 6, 9.
12	The percussive therapy device of claim 2,	<i>See</i> Claim Ref. 8, which is incorporated herein.

	comprising a backward facing electronic display and a backward facing switch configured to activate the motor.	
13	The percussive therapy device of claim 2 ³ , comprising a switch configured to activate the motor, wherein the switch is located on a portion of the housing that faces an opposite direction from the distal end of the output shaft.	See Claim Ref. 7, which is incorporated herein.
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Claim Ref. 3, which is incorporated herein.
15	The percussive therapy device	See Claim Ref. 1[f-6], which is incorporated herein.

³ See fn. 1.

	of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	
16	The percussive therapy device of claim 2, comprising a battery and a handle, wherein the handle comprises the handle portion and the battery is housed in the handle.	<i>See Claim Ref. 10, which is incorporated herein.</i>
17	The percussive therapy device of claim 2, wherein the housing comprises a first portion that extends away from the handle portion and encloses the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	<i>See disclosure for Claim Ref. 11, which is incorporated herein.</i>

18[pre] ⁴	A percussive therapy device comprising:	See disclosure for Claim Ref. 2[pre], which is incorporated herein.
18[a]	a motor configured to output torque about a motor axis;	See disclosure for Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	See disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	See disclosure for Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	See disclosure for Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis	See disclosure for Claim Ref. 2[d-1], which is incorporated herein.

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	See disclosure for Claim Ref. 2[d-2], which is incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See disclosure for Claim Ref. 2[f], which is incorporated herein.
18[g]	the motor is located on a first side of the dividing plane,	See disclosure for Claim Ref. 2[g], which is incorporated herein.
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor	See disclosure for Claim Ref. 2[h], which is incorporated herein.

	is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	See disclosure for Claim Ref. 2[i], which is incorporated herein.
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 18[j], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
19	The percussive	See Claim Ref. 3, which is incorporated

	therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	herein.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See</i> Claim Ref. 1[f-6], which is incorporated herein.

Exhibit A-4
Claim Chart
U.S. Patent No. 12,396,919 in View of US Patent No. 10,314,762

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	US 10,314,762 B1 to Marton et al. (“Marton”) discloses a battery-powered percussive massage device in which rotation of the motor causes reciprocating longitudinal movement of the piston and applicator head to apply percussive treatment to a body part. <i>See</i> Marton, cl. 1; <i>id.</i> , Fig. 1, 16-19.
1[a]	a percussive therapy device comprising:	Marton discloses a portable electromechanical percussive massage applicator (100), also referred to as a percussive massage applicator. <i>See</i> Marton, 7:14-35.
1[b]	a housing;	Marton discloses a housing comprising an upper body portion (112) and a lower body portion (114) that engage to form a generally cylindrical enclosure about a longitudinal axis (116), and a motor enclosure (120). <i>See</i> Marton, cl. 1; <i>id.</i> , Figs. 3, 5.
1[c]	a handle portion;	Marton discloses a battery assembly (132) extending from the enclosure with an outer cylindrical cover (216) that serves as a gripping surface when the device is used. <i>See</i> Marton, 8:50-67; <i>id.</i> , Figs. 1, 9.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Marton discloses a brushless DC electric motor (310) having a central shaft (312) that rotates about a central axis, the motor being housed in the motor enclosure (120). <i>See</i> Marton, cl. 1; <i>id.</i> , Figs. 1-7.

1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	Marton discloses an eccentric crank (360) press-fit onto the central shaft (312) of the electric motor (310) and having a cylindrical crank pivot (370) offset from the central bore of the crank by a selected distance, the crank pivot traveling in a circle about the shaft centerline as the shaft rotates. See Marton, cl. 1; <i>id.</i> , Figs. 11A-B; <i>id.</i> , Figs. 16-19.
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Marton discloses a reciprocation assembly in which a flexible interconnection linkage (512), and in an alternative embodiment a solid linkage (1212), couples the crank to a piston (514; 1214) that is constrained to move within the inner bore (424) of the cylinder body (422) along the longitudinal axis (116). See Marton, cl. 1; <i>id.</i> , Fig. 14; <i>id.</i> , Figs. 25-26.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Marton discloses that the piston (514; 1214) is constrained to move within the inner bore (424) of the cylinder body (422) along the longitudinal axis (116). See Marton, cl. 1; <i>id.</i> , Fig. 14; <i>id.</i> , Figs. 25-26.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	Marton discloses that the central axis of the shaft (312) is perpendicular to the longitudinal axis (116) of the cylindrical bore, that the motor enclosure (120) is substantially perpendicular to the upper body portion, and that the battery assembly receiving enclosure (130) extends substantially perpendicular to the lower body portion. See Marton, cl. 1; <i>id.</i>, Figs. 5, 6. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-3], it would have been obvious

		to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	Marton discloses a crank engagement bearing holder (510) with an annular bearing (536)—and in the alternative embodiment a bearing holder (1222) with an annular bearing (1220)—whose central bore engages the cylindrical crank pivot (370) at a location offset from the dividing plane in a first direction (e.g., toward the battery assembly (132)). <i>See</i> Marton, Figs. 7, 14, 15, 26.
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	Marton discloses that the motor enclosure (120) housing the motor (310) extends upward from the dividing plane (e.g., away from the battery assembly (132)). <i>See</i> Marton, Figs. 3, 5, 7. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-5], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-6], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those

		elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Marton discloses an applicator head (516, 1248) removably coupled to the piston (514, 1214). <i>See</i> Marton, cl. 1-2; <i>id.</i> , Figs. 14, 20-22.
2[pre]	A percussive therapy device comprising:	<i>See</i> Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	<i>See</i> Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	Marton discloses a flexible interconnection linkage (512), and in an alternative embodiment a solid linkage (1212), having a proximal end coupled to the crank via a bearing holder (510; 1222) and a distal end coupled to a piston (514, 1214 in the alternative embodiment). <i>See</i> Marton, cl. 1; <i>id.</i> , Figs. 14, 25-26.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the	Marton discloses that the piston (514; and piston 1214 in the alternative embodiment) is constrained to move along the longitudinal axis (116) within the inner bore (424) of the cylinder body (422), the distal end of the piston removably receiving an applicator head

	motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	(516; 1248). See Marton, cl. 1; <i>id.</i> , Figs. 14, 25-26.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	Marton discloses a flexible interconnection linkage (512), and in an alternative embodiment a solid linkage (1212), having a proximal end coupled to the crank via a bearing holder (510; 1222) and a distal end coupled to the piston (514; 1214). See Marton, Figs. 14, 25-26.
2[e]	the dividing plane is normal to the motor axis,	Marton discloses, expressly or inherently, the dividing plane is normal to the motor axis.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[f], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
2[g]	the motor is located on a first side of the dividing plane,	Marton discloses that the motor (310) is located on a first side of the dividing plane (e.g., away from the battery assembly (132)). See Marton, Fig. 3, 6-7.
2[h]	the device includes an eccentric shaft	Marton discloses an eccentric crank (360) with a cylindrical crank pivot (370) offset from the

	that is configured to travel in a circle about the motor axis when the motor is active,	shaft central axis, the crank pivot traveling in a circle about the shaft centerline as the shaft rotates. See Marton, cl. 1; <i>id.</i> , Figs. 11A-B, 16-19.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	Marton discloses that the proximal end of the flexible interconnection linkage (512), and of the solid linkage (1212) in the alternative embodiment, is coupled to the cylindrical crank pivot (370) through an annular bearing (536; 1220) held in a bearing holder (510; 1222) on a second side of the dividing plane (e.g., toward the battery holder (132)). See Marton, Figs. 14-19, 26.
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[j], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	Marton discloses that the battery assembly receiving enclosure (130) and battery assembly (132) extend downward from the lower body portion, away from the longitudinal axis (116) along which the piston reciprocates. See Marton, Figs. 3, 5.

4	The percussive therapy system of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	Marton discloses an annular bearing (536) within the crank engagement bearing holder (510)—and in the alternative embodiment an annular bearing (1220) within a bearing holder (1222)—whose central bore engages the cylindrical crank pivot (370) between the eccentric crank and the flexible interconnection linkage (512) or the solid linkage (1212). <i>See</i> Marton, Fig. 14, 26. Marton further discloses that the piston (514; 1214) is constrained to move along the longitudinal axis (116). <i>See</i> Marton, Figs. 16-19. Marton discloses that the annular bearing (536, 1220) the electric motor (310) are positioned on opposite sides of the reciprocation axis Marton, Figs. 7 and 15.
5	The percussive therapy system of claim 4¹, wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the	Marton discloses a flexible interconnection linkage (512), and in an alternative embodiment a solid linkage (1212), having a proximal end coupled to the annular bearing (536; 1220) at the crank pivot and a distal end coupled to the piston (514; 1214). <i>See</i> Marton, Figs. 14, 17, 19, 26. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 5, it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9,

¹ Per April 21, 2026, Certificate of Correction.

	reciprocation axis than the distal end of the push rod is.	and/or C-1 to C-6.
6	The percussive therapy system of claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	See Claim Ref. 5, which is incorporated herein.
7	The percussive therapy system of claim 1, wherein the device comprises a switch for activating the motor, and the switch is located on a portion of the housing that faces an opposite direction from a distal end of the push rod assembly.	Marton discloses a central pushbutton switch (162) supported on the proximal side of the motor controller PCB (160) housed in the main body endcap (140) at the proximal end of the main body—the end closest to the user—which faces opposite the distal applicator head. See Marton, Figs. 2, 4B.
8	The percussive therapy system of claim 1, wherein the device	Marton discloses a central pushbutton switch (162) and speed indication LEDs (166A, 166B, 166C) positioned in bores above the switch (with battery charge state LEDs 168A-

² See fn. 1.

	comprises a switch and an electronic display that faces a same direction as the switch, wherein the switch is configured for activating the motor.	168E below the switch), all on the same proximal-facing surface of the main body endcap (140). See Marton, Figs. 2, 4A-B.
9	The percussive therapy system of claim 1, wherein the handle portion extends along a handle portion axis, the reciprocation axis and the handle portion axis both lie on a common plane, and the common plane bisects the housing.	Marton discloses that the longitudinal axis (116) and the axis of the battery enclosure (132) both lie on a common plane, and the common plane bisects the housing (100). Marton, Fig. 7.
10	The percussive therapy system of claim 1, comprising a battery housed in the handle portion.	Marton discloses a battery assembly (132) including a battery unit (214) received within the battery assembly receiving enclosure (130), the battery assembly having an outer cover (216) that serves as a gripping surface. See Marton, cl. 1; <i>id.</i> , Fig. 9.
11	The percussive therapy system of claim 1, wherein the housing comprises a first portion that extends away from the handle portion and encloses a portion of the push rod assembly, and the	Marton discloses that the main body (110) includes a lower body portion (114) that encloses the reciprocation assembly and extends away from the battery assembly (132) and an upper body portion (112) that extends upward from the lower body portion (114) and the battery assembly (132). See Marton, Fig. 3, 5, 7, 13.

	housing comprises a second portion that extends away from the handle portion and the first portion.	
12	The percussive therapy device of claim 2, comprising a backward facing electronic display and a backward facing switch configured to activate the motor.	See Claim Ref. 8, which is incorporated herein.
13	The percussive therapy device of claim 2 ³ , comprising a switch configured to activate the motor, wherein the switch is located on a portion of the housing that faces an opposite direction from the distal end of the output shaft.	See Claim Ref. 7, which is incorporated herein.
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Claim Ref. 3, which is incorporated herein.

³ See fn. 1.

15	The percussive therapy device of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See Claim Ref. 1[f-6], which is incorporated herein.</i>
16	The percussive therapy device of claim 2, comprising a battery and a handle, wherein the handle comprises the handle portion and the battery is housed in the handle.	<i>See Claim Ref. 10, which is incorporated herein.</i>
17	The percussive therapy device of claim 2, wherein the housing comprises a first portion that extends away from the handle portion and encloses the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	<i>See disclosure for Claim Ref. 11, which is incorporated herein.</i>
18[pre] ⁴	A percussive therapy device	<i>See disclosure for Claim Ref. 2[pre], which is</i>

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	comprising:	incorporated herein.
18[a]	a motor configured to output torque about a motor axis;	<i>See</i> disclosure for Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	<i>See</i> disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	<i>See</i> disclosure for Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	<i>See</i> disclosure for Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	<i>See</i> disclosure for Claim Ref. 2[d-1], which is incorporated herein.
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	<i>See</i> disclosure for Claim Ref. 2[d-2], which is incorporated herein.

18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See disclosure for Claim Ref. 2[f], which is incorporated herein.
18[g]	the motor is located on a first side of the dividing plane,	See disclosure for Claim Ref. 2[g], which is incorporated herein.
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	See disclosure for Claim Ref. 2[h], which is incorporated herein.
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	See disclosure for Claim Ref. 2[i], which is incorporated herein.
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 18[j], it would have been obvious to a POSITA as of the effective filing date of

	first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Claim Ref. 3, which is incorporated herein.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	See Claim Ref. 1[f-6], which is incorporated herein.

Exhibit A-5
Claim Chart
U.S. Patent No. 12,396,919 in View of CN 209933448 U

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	CN 209933448 U to Wen (“Wen”) discloses a muscle massage device in which a vibration drive motor assembly drives a massage head to act on the muscle surface through a piston rod member for deep massage. <i>See</i> Wen (Translation), cl. 5; <i>id.</i> , Background.
1[a]	a percussive therapy device comprising:	Wen discloses a muscle massage device. <i>See</i> Wen (Translation), cl. 5; <i>id.</i> , Background
1[b]	a housing;	Wen discloses a device casing comprising an upper shell (1), a lower shell (2), a front shell (3), and a rear shell (6), the upper ends of the upper and lower shells connecting to form an accommodating cavity. <i>See</i> Wen (Translation), cl. 7; <i>id.</i> , Description; <i>id.</i> , Figs. 4-5.
1[c]	a handle portion;	Wen discloses a handle (4) for installing the battery assembly, the handle being connected to the device casing through a detachable snap structure. <i>See</i> Wen (Translation), cl. 1, cl. 5; <i>id.</i> , Fig. 4.
1[d]	a motor positioned in the housing and configured to output torque about a	Wen discloses a motor (7) installed in the device housing, the output end of the motor being connected to an eccentric wheel (9). <i>See</i> Wen (Translation), cl. 5; <i>id.</i> , Description; Wen

	motor axis;	(Drawings), Fig. 4.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	Wen discloses an eccentric wheel (9) connected to the output end of the motor (7) via a fastening screw (11). <i>See</i> Wen (Translation), cl. 5, cl. 9; Wen (Drawings), Fig. 4.
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Wen discloses a connecting rod (13) and a piston rod member (16) configured to reciprocate. <i>See</i> Wen (Translation), cl. 5, cl. 9; <i>id.</i> , Description (p.4); Wen (Drawings), Fig. 4.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Wen discloses that the piston rod member (16) travels along a reciprocation axis. <i>See</i> Wen (Translation), cl. 5, cl. 9; <i>id.</i> , Description, p.4; Wen (Drawings), Fig. 4.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor	Wen discloses that the piston rod member (16) is mounted through a piston rod sleeve (18) and reciprocates therethrough. <i>See</i> Wen (Translation), cl. 5, cl. 7; Description, p.4; Wen (Drawings), Figs. 4-5.

	axis,	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-3], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	Wen discloses that one end of the connecting rod (13) is connected to the eccentric wheel (9) at a location offset from the dividing plane in a first direction (e.g., toward the handle (4)). See Wen (Translation), cl. 9; Wen (Drawings), Fig. 4.
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	Wen discloses that the motor (7) extends away from the dividing plane in a second direction (e.g., away from the handle (4)) . See Wen (Translation), cl. 5, cl. 7; Wen (Drawings), Figs. 4-5. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-5], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.

1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 1[f-6], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Wen discloses a massage head (10) mounted on the piston rod member (16) by a socket-and-spigot manner, permitting rapid replacement without tools. <i>See</i> Wen (Translation), cl. 5; <i>id.</i> , Description; Wen (Drawings), Figs. 4, 9.
2[pre]	A percussive therapy device comprising:	<i>See</i> Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	<i>See</i> Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.

2[d]	a push rod assembly comprising:	Wen discloses a connecting rod (13) and a piston rod member (16). See Wen (Translation), cl. 5, cl. 9; Wen (Drawings), Fig. 4.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	Wen discloses that the piston rod member (16) is mounted through a piston rod sleeve (18) and reciprocates therein, with the massager head (10) mounted on the piston rod member by a socket-and-spigot manner. See Wen (Translation), cl. 5, cl. 9; Wen (Drawings), Fig. 4.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	Wen discloses that the connecting rod (13) has one end connected to the eccentric wheel (9) at the motor output end and another end connected to the piston rod member (16). See Wen (Translation), cl. 5; id., cl. 9; Wen (Drawings), Fig. 4.
2[e]	the dividing plane is normal to the motor	Wen discloses that the dividing plane is normal to the motor axis. See Wen

	axis,	(Drawings), Fig. 4.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	Wen discloses that the handle (4) axis intersects the reciprocation axis and the motor axis. See Wen (Drawings), Fig. 4. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[f], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
2[g]	the motor is located on a first side of the dividing plane,	Wen discloses that the motor (7) is located on a first side of the dividing plane (e.g., away from the handle (4)). See Wen (Translation), cl. 5; Wen (Drawings), Figs. 4-5.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	Wen discloses an eccentric wheel (9) connected to the output end of the motor (7) via a fastening screw (11). See Wen (Translation), cl. 5, cl. 9; Wen (Drawings), Fig. 4.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the	Wen discloses that one end of the connecting rod (13) is connected to the motor (7) via the eccentric wheel (9) on a second side of the dividing plane (e.g., toward the handle (4)). See Wen (Translation), cl. 9; Wen (Drawings), Fig. 4.

	push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	Wen discloses that the connecting rod (13) end connected to the eccentric wheel (9) is farther from the reciprocation axis than the other end that is connected via to the piston rod member (16) is. See Wen (Translation), cl. 9; Wen (Drawings), Fig. 4. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 2[j], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	Wen discloses that the handle (4) extends away from the piston rod member (16) that reciprocates at the front shell (3). See Wen (Translation), cl. 7; Wen (Drawings), Figs. 4-5.
4	The percussive therapy system	Wen discloses a first ball bearing (12) circumferentially arranged along the end of the

	of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	eccentric wheel (9) away from the motor and in clearance fit with the eccentric wheel, the first ball bearing being connected to one end of the connecting rod (13) through a connecting rod gland. <i>See Wen (Translation)</i>, cl. 9; <i>Wen (Drawings)</i>, Fig. 4. Wen further discloses that the piston rod member (16) reciprocates within the piston rod sleeve (18) at the front shell (3) and that the first ball bearing (12) and the motor (7) are positioned on opposite sides of the reciprocation axis. <i>See Wen (Translation)</i>; <i>Wen (Drawings)</i>, Fig. 4.
5	The percussive therapy system of claim 4¹, wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end	Wen discloses a connecting rod (13) having one end connected to the first ball bearing (12) at the eccentric wheel (9) and the other end connected via the second ball bearing (14) and a hinge screw (15) to the piston rod member (16). The end of the connecting rod (13) connected to the first ball bearing (12) is farther from the reciprocation axis than the end of the connecting rod (13) connected to the piston rod member (16) is. <i>See Wen (Translation)</i>, cl. 9; <i>Wen (Drawings)</i>, Fig. 4.

¹ Per April 21, 2026, Certificate of Correction.

	of the push rod is.	
6	The percussive therapy system of claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	See Claim Ref. 5, which is incorporated herein.
7	The percussive therapy system of claim 1, wherein the device comprises a switch for activating the motor, and the switch is located on a portion of the housing that faces an opposite direction from a distal end of the push rod assembly.	Wen discloses a touch key for turning on and adjusting the vibration frequency of the motor, integrated on the main control circuit board (25) arranged on the inner side of the rear shell (6), which is at the opposite end of the casing from the front shell (3) where the massage head (10) is located. See Wen (Translation), cl. 7; Wen (Drawings), Figs. 4-5.

² See fn. 1.

8	The percussive therapy system of claim 1, wherein the device comprises a switch and an electronic display that faces a same direction as the switch, wherein the switch is configured for activating the motor.	Wen discloses a digital tube (26) for displaying the number of hits and a touch key for turning on and adjusting the vibration frequency, both integrated on the main control circuit board (25) with an acrylic glass panel (27) provided corresponding to the digital tube and the touch key. See Wen (Translation); Wen (Drawings), Figs. 4-5.
9	The percussive therapy system of claim 1, wherein the handle portion extends along a handle portion axis, the reciprocation axis and the handle portion axis both lie on a common plane, and the common plane bisects the housing.	Wen discloses a reciprocation axis and the axis of the handle (4) both lie on a common plane, and the common plane bisects the device casing. See Wen (Translation), cl. 7; Wen (Drawings), Figs. 4-5.
10	The percussive therapy system of claim 1, comprising a battery housed in the handle portion.	Wen discloses a battery assembly (5) installed in the handle (4). See Wen (Translation), cl. 1, cl. 5; Wen (Drawings), Fig. 4.
11	The percussive	Wen discloses that the device casing

	therapy system of claim 1, wherein the housing comprises a first portion that extends away from the handle portion and encloses a portion of the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	comprises a lower shell (2) that extends away from the handle (4) and encloses a portion of the connecting rod (13) and an upper shell (1) that extends away from the handle (4) and the lower shell (2). <i>See Wen (Translation), cl. 7; Wen (Drawings), Figs. 4-5.</i>
12	The percussive therapy device of claim 2, comprising a backward facing electronic display and a backward facing switch configured to activate the motor.	<i>See Claim Ref. 8, which is incorporated herein.</i>
13	The percussive therapy device of claim 2 ³ , comprising a switch configured to activate the motor, wherein the switch is located on a	<i>See Claim Ref. 7, which is incorporated herein.</i>

³ *See fn. 1.*

	portion of the housing that faces an opposite direction from the distal end of the output shaft.	
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Claim Ref. 3, which is incorporated herein.</i>
15	The percussive therapy device of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See Claim Ref. 1[f-6], which is incorporated herein.</i>
16	The percussive therapy device of claim 2, comprising a battery and a handle, wherein the handle comprises the handle portion and the battery is housed in the handle.	<i>See Claim Ref. 10, which is incorporated herein.</i>

17	The percussive therapy device of claim 2, wherein the housing comprises a first portion that extends away from the handle portion and encloses the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	See disclosure for Claim Ref. 11, which is incorporated herein.
18[pre] ⁴	A percussive therapy device comprising:	See disclosure for Claim Ref. 2[pre], which is incorporated herein.
18[a]	a motor configured to output torque about a motor axis;	See disclosure for Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	See disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	See disclosure for Claim Ref. 2[c], which is incorporated herein.

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

18[d]	a push rod assembly comprising:	See disclosure for Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	See disclosure for Claim Ref. 2[d-1], which is incorporated herein.
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	See disclosure for Claim Ref. 2[d-2], which is incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.
18[f]	the handle portion	See disclosure for Claim Ref. 2[f], which is

	axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	incorporated herein.
18[g]	the motor is located on a first side of the dividing plane,	<i>See disclosure for Claim Ref. 2[g], which is incorporated herein.</i>
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	<i>See disclosure for Claim Ref. 2[h], which is incorporated herein.</i>
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	<i>See disclosure for Claim Ref. 2[i], which is incorporated herein.</i>

18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	Wen discloses that the connecting rod (13) end connected to the eccentric wheel (9) is farther from the reciprocation axis than the other end that is connected via to the piston rod member (16) is. See Wen (Translation), cl. 9; Wen (Drawings), Fig. 4. To the extent the primary reference does not disclose and/or render obvious the entirety of Claim Ref. 18[j], it would have been obvious to a POSITA as of the effective filing date of the Asserted Claims to combine the primary reference with one or more of the primary or secondary references listed as teaching those elements in Exhibits A-1 to A-5, B-1 to B-9, and/or C-1 to C-6.
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Claim Ref. 3, which is incorporated herein.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	See Claim Ref. 1[f-6], which is incorporated herein.

EXHIBIT B 1-9

Exhibit B-1
Claim Chart
U.S. Patent No. 12,396,919 in View of US Patent No. 7,491,184 B2¹

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	US Patent No. 7,491,184 to Huang (“Huang”) discloses a percussive body massager (10) including massage nodes (66). See Huang, cl. 1; <i>id.</i> , Figs. 1, 4, 5.
1[a]	a percussive therapy device comprising:	Huang discloses the percussive body massager (10). See Huang, cl. 1; <i>id.</i> , Figs. 1, 4, 5.
1[b]	a housing;	Huang discloses a housing (12) formed as a massage head portion (14) and a handle portion (16). See Huang, cl. 1; <i>id.</i> , Figs. 1-3.
1[c]	a handle portion;	Huang discloses a handle portion (16). See Huang, Figs. 1-3.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Huang discloses a motor (30) in the massage head portion (14) and driving an output shaft (34) about a longitudinal axis (44). See Huang, Figs. 4-5.
1[e]	an eccentric shaft configured to travel in a circle about the	Huang discloses a crank arm (36) affixed to the output shaft (34) so that it rotates with the shaft, with the first end (38) of a vertical

¹ This chart also corresponds to US 2001/0027280 A1 and US 2003/0158505 A1.

	motor axis in response to activation of the motor; and	connecting rod (40) affixed eccentrically to the crank arm at an offset location with respect to the longitudinal axis (44) of the output shaft; as the output shaft rotates, the eccentric offset location travels in a circle about the shaft axis, the crank arm operating as an eccentric drive. <i>See</i> Huang, cl. 1; <i>id.</i> , Figs. 4-5.
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Huang discloses a vertical connecting rod (40) whose first end (38) is affixed eccentrically to the crank arm (36) on the output shaft (34) such that rotation of the output shaft (34) causes the connecting rod (40) to reciprocate axially, the reciprocating connecting rod driving the massage nodes (66) that form the massage surface. <i>See</i> Huang, cl. 20; <i>id.</i> , Figs. 4-5.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Huang discloses a stud (46) connected to the connecting rod (40) such that rotation of the output shaft (34) causes the stud (46) to reciprocate axially. <i>See</i> Huang, cl. 17; <i>id.</i> , Figs. 4-5.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	Huang discloses that the stud (46) reciprocates axially transverse to handle portion (16) on a dividing plane normal to the longitudinal axis (44). <i>See</i> Huang, Figs. 3-5.

1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	Huang discloses that the first (proximal) end (38) of the connecting rod (40) is affixed eccentrically to the crank arm (36) at a offset location with respect to a dividing plane in a first direction (e.g., away from the motor (30)). See Huang, Figs. 4-5.
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	Huang discloses that the motor (30) extends transverse to the handle portion (16) and away from the dividing plane in a second direction. See Huang, Figs. 3-5.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Huang discloses removable, interchangeable massage nodes (66) fastened to the reciprocating assembly via screws (56). See Huang, cl. 12; <i>id.</i> , Figs. 4-5.
2[pre]	A percussive therapy device comprising:	See Claim Ref. 1[a], which is incorporated herein.

2[a]	a motor configured to output torque about a motor axis;	See Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	See Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	Huang discloses a vertical connecting rod (40) connected to a stud (46). See Huang, cl. 20; <i>id.</i> , Figs. 4-5.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	Huang discloses that the stud (46) reciprocates axially in response to rotation of the output shaft (34) and is connected to the massage nodes (66). See Huang, cl. 20; <i>id.</i> , Figs. 4-5.

2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	Huang discloses a vertical connecting rod (40) having a first (proximal) end (38) affixed eccentrically to the crank arm (36) on the motor's output shaft (34) and a second (distal) end (48) coupled to the stud (46). <i>See</i> Huang, cl. 20; <i>id.</i> , Figs. 4-5.
2[e]	the dividing plane is normal to the motor axis,	Huang discloses that the dividing plane is normal to the longitudinal axis (34). <i>See</i> Huang, Figs. 4-5.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
2[g]	the motor is located on a first side of the dividing plane,	Huang discloses that the motor (30) is located on a first side of the dividing plane (e.g., toward the center of Fig. 5). <i>See</i> Huang, Figs. 4-5.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	Huang discloses a crank arm (36) affixed to the output shaft (34) with the connecting rod's first end (38) affixed eccentrically at an offset location, so the eccentric location travels in a circle about the output shaft axis (44) as the shaft rotates. <i>See</i> Huang, cl. 1; <i>id.</i> , Figs. 4-5.
2[i]	the proximal end of	Huang discloses that the first (proximal) end

	the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	(38) of the connecting rod (40) is coupled to the crank arm (36) on a second side of the dividing plane (e.g., away from the motor (30)). <i>See</i> Huang, Figs. 4-5.
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	Huang discloses that the first (proximal) end (38) of the connecting rod (40) is farther from the reciprocation axis than the second (distal) end (48). <i>See</i> Huang, cl. 20; <i>id.</i> , Figs. 4-5.
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	Huang discloses that the handle portion (16) extends away from the reciprocation axis. <i>See</i> Huang, Figs. 4-5.
4	The percussive therapy system of claim 1, wherein the percussive therapy device	Huang discloses a rotary bearing (42) between the crank arm (36) and the first end (38) of the connecting rod (40). <i>See</i> Huang, Figs. 4-5. Huang further discloses that the rotary bearing

	comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	(42) and the motor (30) positioned on opposite sides of the reciprocation axis. <i>See</i> Huang, Figs. 4-5.
5	The percussive therapy system of claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	Huang discloses that the connecting rod (40) has a first (proximal) end (38) is coupled to the crank arm (36) via a rotary bearing (42) and a second (distal) end (48) is coupled to the stud (46). The first (proximal) end (38) is farther from the reciprocation axis than the second (distal) end (48) is. <i>See</i> Huang, Figs. 4-5.

² Per April 21, 2026, Certificate of Correction.

6	The percussive therapy system of claim 4 ³ , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	See Claim Ref. 5, which is incorporated herein.
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Claim Ref. 3, which is incorporated herein.
18[pre] ⁴	A percussive therapy device comprising:	See disclosure for Claim Ref. 2[pre], which is incorporated herein.
18[a]	a motor configured to output torque	See disclosure for Claim Ref. 2[a], which is

³ See fn. 1.

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	about a motor axis;	incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	See disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	See disclosure for Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	See disclosure for Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	See disclosure for Claim Ref. 2[d-1], which is incorporated herein.
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal	See disclosure for Claim Ref. 2[d-2], which is incorporated herein.

	end connected to the output shaft; wherein:	
18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	See disclosure for Claim Ref. 2[g], which is incorporated herein.
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	See disclosure for Claim Ref. 2[h], which is incorporated herein.
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the	See disclosure for Claim Ref. 2[i], which is incorporated herein.

	push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	Huang discloses that the first (proximal) end (38) of the connecting rod (40) is coupled to the crank arm (36) at a first location while the second (distal) end (48) is coupled to the stud (46) at a second location, the first location being farther from the reciprocation axis than the second location is. <i>See</i> Huang, cl. 20; <i>id.</i>, Figs. 4-5.
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See</i> Claim Ref. 3, which is incorporated herein.

Exhibit B-2
Claim Chart
U.S. Patent No. 12,396,919 in View of US 5,716,332

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	US 5,716,332 to Noble (“Noble ’332”) a body massager having a massage head (20) that exerts a percussive massage effect. See Noble ’332, cl. 1; <i>id.</i> , Fig. 1.
1[a]	a percussive therapy device comprising:	Noble ’332 discloses a body massager. See Noble ’332, cl. 1.
1[b]	a housing;	Noble ’332 discloses a base structure including a casing (moulding 24) that encloses the working parts of the massager. See Noble ’332, Fig. 1.
1[c]	a handle portion;	Noble ’332 discloses a slender elongate handle (22) with a lower handle portion (22a) and an upper handle portion (22b). See Noble ’332, Figs. 1–2.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Noble ’332 discloses an electric motor (54) having a driven rotary output shaft (56) extending about an axis B. See Noble ’332, Fig. 3; <i>id.</i> , cl. 1; <i>id.</i> , Fig. 3.
1[e]	an eccentric shaft configured to travel in a circle about the	Noble ’332 discloses that the link (64) provides at its upper end an eccentric bearing (66) connected to an eccentric counterbalance

	motor axis in response to activation of the motor; and	weight (68) such that as the shaft rotates, the eccentric bearing travels in a circle about the shaft axis B and the link imparts oscillatory motion. <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1.
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Noble '332 discloses that the link (64) is coupled to the output shaft (56) of the electric motor (54) via an eccentric bearing (66) such that rotation of the shaft causes the link to impart a generally up-and-down oscillatory motion that reciprocates the massage head. <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Noble '332 discloses an annular disk (71) coupled at a lower end of the link (64). <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	Noble '332 discloses that the reciprocation axis (56) extends transverse to the handle portion (22) on a dividing plane normal to the motor axis (B). <i>See</i> Noble '332, Fig. 1; <i>id.</i> , Fig. 3.
1[f-4]	a proximal end of the push rod assembly is	Noble '332 discloses that the upper (proximal) end of the link (64) is connected to the eccentric counterbalance weight (68) via the

	connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	eccentric bearing (66) at a location offset from dividing plane in a first direction (e.g., away from the motor (54)). <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1; <i>id.</i> , Fig. 3.
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	Noble '332 discloses that the motor (54) extends transverse to the handle portion (22) and away from the dividing plane in a second direction in a second direction (e.g., toward a center of Fig. 3). <i>See</i> Noble '332, Fig. 1; <i>id.</i> , Fig. 3.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Noble '332 discloses hemispherical massage formations (34, 36) with removable covers (46) and replaceable cushion members (48). <i>See</i> Noble '332, cl. 4; <i>id.</i> , Fig. 3.
2[pre]	A percussive therapy device comprising:	<i>See</i> Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque	<i>See</i> Claim Ref. 1[d], which is incorporated herein.

	about a motor axis;	
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	Noble '332 discloses a link (64) connected to an annular disk (70). <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	Noble '332 discloses that the annual disk (70), upon rotation of the output shaft (56), imparts up-and-down oscillatory motion to annular disk 70) coupled to the massage head that carries the massage formations (34, 36). <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1.
2[d-2]	a push rod having a proximal end	Noble '332 discloses that the link (64) has an upper (proximal) end coupled to the motor's

	operatively connected to the motor and a distal end connected to the output shaft; wherein:	output shaft (56) and a lower (distal) end connected to the annular disk (71). <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1.
2[e]	the dividing plane is normal to the motor axis,	Noble '332 discloses that the dividing plane is normal to the motor axis B. <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
2[g]	the motor is located on a first side of the dividing plane,	Noble '332 discloses that the motor (54) is on a first side of the dividing plane. <i>See</i> Noble '332, Fig. 3.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	Noble '332 discloses an eccentric counterbalance weight (68) connected to the upper end of the link (64), which travels in a circle about the shaft axis B as the shaft rotates. <i>See</i> Noble '332, Fig. 3; <i>id.</i> , cl. 1.
2[i]	the proximal end of the push rod is operatively connected to the motor by the	Noble '332 discloses that the upper (proximal) end of the link (64) is coupled to the output shaft (56) via the eccentric counterbalance weight (68) on a second side of the dividing

	eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	plane. See Noble '332, Fig. 3; <i>id.</i> , cl. 1.
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	Noble '332 discloses that the upper (proximal) end of the link (64) is farther from the reciprocation axis than the lower (distal) end is. See Noble '332, Fig. 3; <i>id.</i> , cl. 1.
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	
4	The percussive therapy system of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod	Noble '332 discloses an eccentric bearing (66) between the link (64) and the eccentric counterbalance weight (68). See Noble '332, Fig. 3; <i>id.</i>, cl. 1. Noble '332 further discloses that the bearing (66) and the motor (58) are on opposite sides of the reciprocation axis. See Noble '332, Fig.

	assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	3.
5	The percussive therapy system of claim 4 ¹ , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	Noble '332 discloses that the link (64) has an upper (proximal) end coupled to the output shaft (56) via the eccentric bearing (66) and a lower (distal) end coupled to the annular disk (70). See Noble '332, Fig. 3; <i>id.</i> , cl. 1.
6	The percussive therapy system of	See Claim Ref. 5, which is incorporated herein.

¹ Per April 21, 2026, Certificate of Correction.

	claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	
12	The percussive therapy device of claim 2, comprising a backward facing electronic display and a backward facing switch configured to activate the motor.	See Claim Ref. 8, which is incorporated herein.
13	The percussive therapy device of claim 2 ³ , comprising a switch configured to activate the motor, wherein the switch	See Claim Ref. 7, which is incorporated herein.

² See fn. 1.

³ See fn. 1.

	is located on a portion of the housing that faces an opposite direction from the distal end of the output shaft.	
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See</i> Claim Ref. 3, which is incorporated herein.
18[pre] ⁴	A percussive therapy device comprising:	<i>See</i> disclosure for Claim Ref. 2[pre], which is incorporated herein.
18[a]	a motor configured to output torque about a motor axis;	<i>See</i> disclosure for Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	<i>See</i> disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	<i>See</i> disclosure for Claim Ref. 2[c], which is incorporated herein.

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

18[d]	a push rod assembly comprising:	See disclosure for Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	See disclosure for Claim Ref. 2[d-1], which is incorporated herein.
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	See disclosure for Claim Ref. 2[d-2], which is incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.

18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	<i>See disclosure for Claim Ref. 2[g], which is incorporated herein.</i>
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	<i>See disclosure for Claim Ref. 2[h], which is incorporated herein.</i>
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the	<i>See disclosure for Claim Ref. 2[i], which is incorporated herein.</i>

	dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	Noble '322 discloses that the upper (proximal) end of the link (64) is coupled to the eccentric counterbalance weight (68) at a first location, the lower (distal) end of the link (64) is connected to the annular disk (70) at a second location, and the first location is farther from the reciprocation axis than the second location is. See Noble '322, FIG. 3.

Exhibit B-3
Claim Chart
U.S. Patent No. 12,396,919 in View of US Patent No. 4,730,605

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	US Patent No. 4,730,605 to Noble (“Noble ’605”) discloses a percussive body massager that imparts a percussive massage action to the body. <i>See</i> Noble ’605, cl. 1; <i>id.</i> , Fig. 1.
1[a]	a percussive therapy device comprising:	Noble ’605 discloses a percussive body massager that imparts a percussive massage action to the body. <i>See</i> Noble ’605, cl. 1; <i>id.</i> , Fig. 1.
1[b]	a housing;	Noble ’605 discloses a casing (20) forming part of the base structure of the massager. <i>See</i> Noble ’605, Fig. 4.
1[c]	a handle portion;	Noble ’605 discloses handles (22, 24) on the casing (20) for manipulating the massager. <i>See</i> Noble ’605, Figs. 1–3.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Noble ’605 discloses a drive unit (28) comprising an electric motor carried by the base structure and having a driven rotary output shaft (30) that outputs torque about a motor axis. <i>See</i> Noble ’605, cl. 3; <i>id.</i> , Fig. 4.
1[e]	an eccentric shaft configured to travel in a circle about the	Noble ’605 discloses an eccentric (50) carried on the motor output shaft (30) and secured thereto by a setscrew (54), such that upon

	motor axis in response to activation of the motor; and	activation of the motor (28) the eccentric (50) travels in a circle about the motor axis. <i>See</i> Noble '605, cl. 3; <i>id.</i> , Figs. 4–6.
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Noble '605 discloses a connecting rod (56) extending between the eccentric (50) and the massage head (34) and operatively connected to the motor (28), the connecting rod (56) being configured to reciprocate the massage head in a direction (44) in response to activation of the motor, thereby converting rotary motion of the output shaft (30) into reciprocating motion. <i>See</i> Noble '605, cl. 3; <i>id.</i> , Figs. 4–6.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Noble '605 discloses a resilient link (46) configured to reciprocate along an axis when the connecting rod (56) reciprocates. <i>See</i> Noble '605, cl. 3; <i>id.</i> , Figs. 4–6.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	Noble '605 discloses that the connecting rod (56) reciprocates the massage head (34) in a direction (44) generally normal to the pivot axis A and the motor output shaft (30), the massage head being contoured symmetrically about a transverse centre line C. <i>See</i> Noble '605, cl. 1; <i>id.</i> , Figs. 5, 8.
1[f-4]	a proximal end of the push rod	Noble '605 discloses that the stub shaft (58) connecting the eccentric (50) and the

	assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	connecting rod (56) is offset from the dividing plane in a first direction (e.g., away from the motor (28) in Fig. 8). <i>See</i> Noble '605, cl. 3; <i>id.</i> , Figs. 4, 8.
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	Noble '605 discloses that the drive motor (28) extends transverse to the handle (22) and away from the dividing plane in a second direction (e.g., toward the center in Fig. 8). <i>See</i> Noble '605, cl. 3; <i>id.</i> , Fig. 4.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Noble '605 discloses a massage head (34) having hemispherical massage formations (96, 98) operatively connected to the connecting rod (56) via the resilient link (46). <i>See</i> Noble '605, cl. 10; <i>id.</i> , Figs. 3, 8.
2[pre]	A percussive therapy device comprising:	<i>See</i> Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque	<i>See</i> Claim Ref. 1[d], which is incorporated

	about a motor axis;	herein.
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	<i>See</i> Claim Ref. 1[f-1], which is incorporated herein.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	<i>See</i> Claim Ref. 1[f-2], which is incorporated herein.
2[d-2]	a push rod having a proximal end operatively	<i>See</i> Claim Ref. 1[f-4], which is incorporated herein.

	connected to the motor and a distal end connected to the output shaft; wherein:	
2[e]	the dividing plane is normal to the motor axis,	Noble '605 discloses the dividing plane is normal to the axis of the motor (24). <i>See</i> Noble '605, Fig. 8.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
2[g]	the motor is located on a first side of the dividing plane,	Noble '605 discloses that the motor (28) is on a first side of the dividing plane. <i>See</i> Noble '605, Fig. 8.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	Noble '605 discloses an eccentric (50) carried on the motor output shaft (30), secured by a setscrew (54), that travels in a circle about the motor axis when the motor (28) is active. <i>See</i> Noble '605, cl. 3; <i>id.</i> , Figs. 4–6.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft,	Noble '605 discloses that the proximal end of the connecting rod (56) is operatively connected to the motor (28) by the eccentric (50) at a second side of the dividing plane. <i>See</i> Noble '605, cl. 3; <i>id.</i> , Figs. 4, 8.

	wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	Noble '605 discloses that the proximal (upper) end of the connecting rod (56) is farther from the reciprocation axis than the distal (lower) end is. See Noble '605, Figs. 4, 8.
5	The percussive therapy system of claim 4 ¹ , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis	Noble '605 discloses a connecting rod (56) whose proximal (upper) end is coupled to the bearing (60) and whose distal (lower) end is coupled to the resilient link (46), and the proximal (upper) end is farther from the reciprocation axis than the distal (lower) end is. See Noble '605, Figs. 4–8.

¹ Per April 21, 2026, Certificate of Correction. Ex-1001, p.78.

	than the distal end of the push rod is.	
6	The percussive therapy system of claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	See Claim Ref. 5, which is incorporated herein.
12	The percussive therapy device of claim 2, comprising a backward facing electronic display and a backward facing switch configured to activate the motor.	See Claim Ref. 8, which is incorporated herein.
13	The percussive therapy device	See Claim Ref. 7, which is incorporated herein.

² See fn. 1.

	of claim 2 ³ , comprising a switch configured to activate the motor, wherein the switch is located on a portion of the housing that faces an opposite direction from the distal end of the output shaft.	
18[pre] ⁴	A percussive therapy device comprising:	<i>See disclosure for Claim Ref. 2[pre], which is incorporated herein.</i>
18[a]	a motor configured to output torque about a motor axis;	<i>See disclosure for Claim Ref. 2[a], which is incorporated herein.</i>
18[b]	a handle portion extending along a handle portion axis;	<i>See disclosure for Claim Ref. 2[b], which is incorporated herein.</i>
18[c]	a housing; and	<i>See disclosure for Claim Ref. 2[c], which is incorporated herein.</i>
18[d]	a push rod assembly comprising:	<i>See disclosure for Claim Ref. 2[d], which is incorporated herein.</i>

³ See fn. 1.

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	See disclosure for Claim Ref. 2[d-1], which is incorporated herein.
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	See disclosure for Claim Ref. 2[d-2], which is incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis	

	and intersects the reciprocation axis and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	<i>See disclosure for Claim Ref. 2[g], which is incorporated herein.</i>
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	<i>See disclosure for Claim Ref. 2[h], which is incorporated herein.</i>
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	<i>See disclosure for Claim Ref. 2[i], which is incorporated herein.</i>
18[j]	the proximal end of the push rod is coupled to the	Noble '605 discloses that the proximal (upper) end of the connecting rod (56) is coupled to the eccentric (50) at a first location and the

	eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	distal (lower) end is coupled to the resilient link (46) at a second location, and the first location is farther from the reciprocation axis than the second location is. <i>See Noble '605, Fig. 8</i>
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Exhibit B-4
Claim Chart
U.S. Patent No. 12,396,919 in View of US Patent No. 3,837,335

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	U.S. Patent No. 3,837,335 to Teranishi et al. (“Teranishi”) discloses a massaging vibrator that gives shocks to desired body parts via a vibrating portion (21). <i>See</i> Teranishi, cl. 1.
1[a]	a percussive therapy device comprising:	Teranishi discloses the massaging vibrator. <i>See</i> Teranishi, cl. 1.
1[b]	a housing;	Teranishi discloses a casing (6) forming the massage head and a grip (1). <i>See</i> Teranishi, Figs. 1–2.
1[c]	a handle portion;	Teranishi discloses a grip portion (1) housing the motor (2). <i>See</i> Teranishi, cl. 1; <i>id.</i> , Fig. 1.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Teranishi discloses a motor (2) housed in the grip (1) and having a drive shaft (9) with a drive gear (11) thereon that outputs torque about a motor axis. <i>See</i> Teranishi, cl. 1; <i>id.</i> , Fig. 2.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the	Teranishi discloses a gearpin (14) fixed eccentrically on a driven gear (12) that is driven by the drive gear (11); upon activation of the motor (2), the gearpin (14) moves with the periphery of the gear (12) and thereby travels in a circle about the axis of the driven-

	motor; and	gear shaft (13). <i>See</i> Teranishi, cl. 1; <i>id.</i> , Fig. 2.
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Teranishi discloses a lever (18) having a rectangular gearpin slot (19) engaged by the gearpin (14), and a vibrating rod (20) connected under the lever (18), such that upon activation of the motor (2) the gearpin (14) reciprocates the vibrating rod (20) in an intermittent vibrating motion along its axis, an outer portion of the rod extending out of the casing (6) to a vibrating head portion (21). <i>See</i> Teranishi, cl. 1; <i>id.</i> , Fig. 2.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Teranishi discloses a lever (18) having a rectangular gearpin slot (19) engaged by the gearpin (14), and a vibrating rod (20) connected under the lever (18), such that upon activation of the motor (2) the gearpin (14) reciprocates the vibrating rod (20) in an intermittent vibrating motion along its axis, an outer portion of the rod extending out of the casing (6) to a vibrating head portion (21). <i>See</i> Teranishi, cl. 1; <i>id.</i> , Fig. 2.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	<i>See</i> Teranishi, Fig. 4.
1[f-4]	a proximal end of the push rod assembly is connected to the	<i>See</i> Teranishi, Fig. 3.

	eccentric shaft at a location offset from the dividing plane in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	See Teranishi, Figs. 3-4.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Teranishi discloses a vibrating head portion (21) on the vibrating rod (20), which may be covered with a buffer material. See Teranishi, Fig. 2.
2[pre]	A percussive therapy device comprising:	See Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	See Claim Ref. 1[d], which is incorporated herein.

2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	Teranishi discloses a lever (18) connected to a vibrating rod (20). <i>See</i> Teranishi, Figs. 3-4.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	Teranishi discloses that the vibrating rod (20) reciprocates in an intermittent vibrating motion in response to activation of the motor (2), an outer (distal) portion of the vibrating rod (20) extending out of the casing (6) and carrying a vibrating head portion (21). <i>See</i> Teranishi, cl. 1; <i>id.</i> , Fig. 2.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal	Teranishi discloses that the lever (18) has an upper (proximal) portion with a rectangular gearpin slot (19) operatively connected to the motor (2) through the gearpin (14) and driven gear (12) and a lower portion connecting to the

	end connected to the output shaft; wherein:	vibrating rod (20) that extends to the vibrating head portion (21). <i>See</i> Teranishi, cl. 1; <i>id.</i> , Fig. 2.
2[e]	the dividing plane is normal to the motor axis,	<i>See</i> Teranishi, Fig. 4.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
2[g]	the motor is located on a first side of the dividing plane,	<i>See</i> Teranishi, Fig. 4.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	Teranishi discloses a gearpin (14) fixed eccentrically on the driven gear (12), which travels in a circle about the axis of the driven-gear shaft (13) when the motor (2) is active. <i>See</i> Teranishi, cl. 1; <i>id.</i> , Fig. 2.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the	<i>See</i> Teranishi, Figs. 3-4.

	push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	See Teranishi, Figs. 3-4.
4	The percussive therapy system of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	See Teranishi, Figs. 3-4.

5	The percussive therapy system of claim 4¹, wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	See Teranishi, Figs. 3-4.
6	The percussive therapy system of claim 4², wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the	See Claim Ref. 5, which is incorporated herein.

¹ Per April 21, 2026, Certificate of Correction.

² See fn. 1.

	reciprocation axis than the distal end of the push rod is.	
18[pre] ³	A percussive therapy device comprising:	<i>See disclosure for Claim Ref. 2[pre], which is incorporated herein.</i>
18[a]	a motor configured to output torque about a motor axis;	<i>See disclosure for Claim Ref. 2[a], which is incorporated herein.</i>
18[b]	a handle portion extending along a handle portion axis;	<i>See disclosure for Claim Ref. 2[b], which is incorporated herein.</i>
18[c]	a housing; and	<i>See disclosure for Claim Ref. 2[c], which is incorporated herein.</i>
18[d]	a push rod assembly comprising:	<i>See disclosure for Claim Ref. 2[d], which is incorporated herein.</i>
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an	<i>See disclosure for Claim Ref. 2[d-1], which is incorporated herein.</i>

³ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	See disclosure for Claim Ref. 2[d-2], which is incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	See disclosure for Claim Ref. 2[g], which is incorporated herein.
18[h]	the device includes an eccentric shaft	See disclosure for Claim Ref. 2[h], which is

	that is configured to travel in a circle about the motor axis when the motor is active,	incorporated herein.
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	<i>See disclosure for Claim Ref. 2[i], which is incorporated herein.</i>
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second	<i>See Teranishi, Fig. 3.</i>

	location is.	
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Exhibit B-5
Claim Chart
U.S. Patent No. 12,396,919 in View of KR 200345192Y1

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	KR 200345192Y1 to Kim (“Kim”) discloses a body massager in which a massage device (50) is struck up and down by rotational force transmitted from a drive motor (20) to tap a body part. See Kim, Fig. 1.
1[a]	a percussive therapy device comprising:	Kim discloses a body massager. See Kim, Fig. 1.
1[b]	a housing;	Kim discloses a main body (10) housing the working components. See Kim, Fig. 2.
1[c]	a handle portion;	Kim discloses a handle (11) integrally formed at the bottom of the main body (10). See Kim, Fig. 1.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Kim discloses a motor (20) mounted inside the main body (10) and having a motor shaft (21) that outputs torque about a motor axis. See Kim, Fig. 2.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to	Kim discloses an eccentric rotation shaft (30) horizontally connected to the motor shaft (21), such that upon activation of the motor (20) the eccentric rotation shaft (30) travels in a circle

	activation of the motor; and	about the motor axis. <i>See Kim, Fig. 2.</i>
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Kim discloses a movable shaft (40) vertically connected to the eccentric rotation shaft (30) and operatively connected to the motor (20), such that upon activation of the motor the movable shaft (40) reciprocates up and down along its axis and carries the massage device (50). <i>See Kim, Fig. 2.</i>
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Kim discloses a massage device connecting plate (60) that reciprocates when the movable shaft (40) moves. <i>See Kim, Figs. 1-3.</i>
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	<i>See Kim, Figs. 1-3.</i>
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a	<i>See Kim, Fig. 2.</i>

	location offset from the dividing plane in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	<i>See Kim, Fig. 2.</i>
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Kim discloses a massage device (50) fitted onto the massage device connecting plate (60). <i>See Kim, Figs. 1, 3.</i>
2[pre]	A percussive therapy device comprising:	<i>See Claim Ref. 1[a], which is incorporated herein.</i>
2[a]	a motor configured to output torque about a motor axis;	<i>See Claim Ref. 1[d], which is incorporated herein.</i>

2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	<i>See</i> Claim Ref. 1[f-1], which is incorporated herein.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	<i>See</i> Claim Ref. 1[f-2], which is incorporated herein.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal	<i>See</i> Claim Ref. 1[f-4], which is incorporated herein.

	end connected to the output shaft; wherein:	
2[e]	the dividing plane is normal to the motor axis,	See Kim, Fig. 2.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
2[g]	the motor is located on a first side of the dividing plane,	See Kim, Fig. 2.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	See Claim Ref. 1[e], which is incorporated herein.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the	See Kim, Fig. 2.

	push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	<i>See Kim, Fig. 2.</i>
18[pre] ¹	A percussive therapy device comprising:	<i>See disclosure for Claim Ref. 2[pre], which is incorporated herein.</i>
18[a]	a motor configured to output torque about a motor axis;	<i>See disclosure for Claim Ref. 2[a], which is incorporated herein.</i>
18[b]	a handle portion extending along a handle portion axis;	<i>See disclosure for Claim Ref. 2[b], which is incorporated herein.</i>
18[c]	a housing; and	<i>See disclosure for Claim Ref. 2[c], which is incorporated herein.</i>
18[d]	a push rod assembly	<i>See disclosure for Claim Ref. 2[d], which is</i>

¹ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	comprising:	incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	See disclosure for Claim Ref. 2[d-1], which is incorporated herein.
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	See disclosure for Claim Ref. 2[d-2], which is incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.
18[f]	the handle portion axis extends at an	

	oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	<i>See disclosure for Claim Ref. 2[g], which is incorporated herein.</i>
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	<i>See disclosure for Claim Ref. 2[h], which is incorporated herein.</i>
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	<i>See disclosure for Claim Ref. 2[i], which is incorporated herein.</i>
18[j]	the proximal end of	<i>See Kim, Fig. 2.</i>

	the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	
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Exhibit B-6
Claim Chart
U.S. Patent No. 12,396,919 in View of EP 1964537 A1

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	EP 1964537 A1 to Takeda (“Takeda”) discloses a massaging device (1) including a treating section (3). <i>See</i> Takeda, Abstract; <i>id.</i> , Fig. 3.
1[a]	a percussive therapy device comprising:	Takeda discloses a massaging device (1). <i>See</i> Takeda, Abstract; <i>id.</i> , Fig. 3.
1[b]	a housing;	Takeda discloses a main body (2). <i>See</i> Takeda, Abstract; <i>id.</i> , Fig. 3.
1[c]	a handle portion;	
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Takeda discloses a motor (6) configured to output torque about a drive shaft (6A). <i>See</i> Takeda, ¶[0013]; <i>id.</i> , Fig. 3.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	Takeda discloses an eccentric shaft (13A). <i>See</i> Takeda, ¶[0013]; <i>id.</i> , Fig. 3.

1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Takeda discloses a push rod assembly including at least a connecting rod (14) and a hook (16). <i>See</i> Takeda, ¶[0013]; <i>id.</i> , Fig. 3.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Takeda discloses that the hook (16) reciprocates. <i>See</i> Takeda, ¶[0013]; <i>id.</i> , Fig. 3.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	<i>See</i> Takeda, ¶[0013]; <i>id.</i> , Fig. 3
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane	<i>See</i> Takeda, ¶[0013]; <i>id.</i> , Fig. 3

	in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	See Takeda, ¶[0013]; <i>id.</i> , Fig. 3
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Takeda discloses that the treating section (3) is removably attached to the hook (16). See Takeda, ¶[0023]; <i>id.</i> , Fig. 3
2[pre]	A percussive therapy device comprising:	See Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	See Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a	

	handle portion axis;	
2[c]	a housing; and	See Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	See Claim Ref. 1[f-1], which is incorporated herein.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	See Claim Ref. 1[f-2], which is incorporated herein.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	See Takeda, ¶[0013]; <i>id.</i> , Fig. 3

2[e]	the dividing plane is normal to the motor axis,	See Takeda, ¶[0013]; <i>id.</i> , Fig. 3
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
2[g]	the motor is located on a first side of the dividing plane,	See Takeda, ¶[0013]; <i>id.</i> , Fig. 3
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	See Claim Ref. 1[e], which is incorporated herein.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing	See Takeda, ¶[0013]; <i>id.</i> , Fig. 3

	plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	See Takeda, ¶[0013]; <i>id.</i> , Fig. 3
18[pre] ¹	A percussive therapy device comprising:	See disclosure for Claim Ref. 2[pre], which is incorporated herein.
18[a]	a motor configured to output torque about a motor axis;	See disclosure for Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	See disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	See disclosure for Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	See disclosure for Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft	See disclosure for Claim Ref. 2[d-1], which is

¹ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	incorporated herein.
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	See disclosure for Claim Ref. 2[d-2], which is incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	See disclosure for Claim Ref. 2[e], which is incorporated herein.
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis	

	and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	See disclosure for Claim Ref. 2[g], which is incorporated herein.
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	See disclosure for Claim Ref. 2[h], which is incorporated herein.
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	See disclosure for Claim Ref. 2[i], which is incorporated herein.
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the	See Takeda, ¶[0013]; <i>id.</i> , Fig. 3

	distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	
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Exhibit B-7
Claim Chart
U.S. Patent No. 12,396,919 in View of CN 209596176U

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	CN 209596176U to Song (“Song”) discloses an electric massager including a massage head (30). <i>See</i> Song, Abstract; <i>id.</i> , Fig. 2.
1[a]	a percussive therapy device comprising:	Song discloses an electric massager. <i>See</i> Song, Abstract; <i>id.</i> , Fig. 2.
1[b]	a housing;	Song discloses a housing (10, 20). <i>See</i> Song, Abstract; <i>id.</i> , Fig. 2.
1[c]	a handle portion;	Song discloses a handle portion (20). <i>See</i> Song, Abstract; <i>id.</i> , Fig. 2.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Song discloses a motor (11) outputting torque about a connecting shaft (12). <i>See</i> Song, Abstract; <i>id.</i> , Figs. 1-2.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	Song discloses an eccentric disk (13) having a connecting shaft (14). <i>See</i> Song, Abstract; <i>id.</i> , Figs. 1-2.

1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Song discloses a connecting rod (15) connected to an output rod (17). <i>See</i> Song, Abstract; <i>id.</i> , Figs. 1-2.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Song discloses that the output rod (17) reciprocates. <i>See</i> Song, Abstract; <i>id.</i> , Figs. 1-2.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	<i>See</i> Song, Figs. 1-2.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane	<i>See</i> Song, Figs. 1-2.

	in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	<i>See Song, Figs. 1-2.</i>
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	<i>See Song, Fig. 2.</i>
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Song discloses a massage head (30) connected to the output rod (17). <i>See Song, Fig. 2.</i>
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Song, Fig. 2.</i>
4	The percussive therapy system	<i>See Song, Fig. 2.</i>

	of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	
5	The percussive therapy system of claim 4¹, wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end	See Song, Fig. 2.

¹ Per April 21, 2026, Certificate of Correction.

	of the push rod is.	
6	The percussive therapy system of claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	See Claim Ref. 5, which is incorporated herein.
9	The percussive therapy system of claim 1, wherein the handle portion extends along a handle portion axis, the reciprocation axis and the handle portion axis both lie on a common plane, and the common plane bisects the housing.	See Song, Fig. 2.
10	The percussive	See Song, Fig. 2.

² See fn. 1.

	therapy system of claim 1, comprising a battery housed in the handle portion.	
11	The percussive therapy system of claim 1, wherein the housing comprises a first portion that extends away from the handle portion and encloses a portion of the push rod assembly, and the housing comprises a second portion that extends away from the handle portion and the first portion.	<i>See Song, Fig. 2.</i>

Exhibit B-8
Claim Chart
U.S. Patent No. 12,396,919 in View of CN 206822844U

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	CN 206822844U to Zhu (“Zhu”) discloses a drive mechanism for a massager. <i>See</i> Zhu, Abstract; <i>id.</i> , Figs. 1-4.
1[a]	a percussive therapy device comprising:	Zhu discloses a drive mechanism for a massager. <i>See</i> Zhu, Abstract; <i>id.</i> , Figs. 1-4.
1[b]	a housing;	
1[c]	a handle portion;	
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Zhu discloses a motor (1). <i>See</i> Zhu, Abstract; <i>id.</i> , Figs. 1-4.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	Zhu discloses an eccentric shaft (2, 22). <i>See</i> Zhu, Abstract; <i>id.</i> , Figs. 1-4.
1[f-1]	a push rod assembly	Zhu discloses a gangbar (3) connected to a

	operatively connected to the motor and configured to reciprocate in response to activation of the motor,	massage shaft (5). <i>See</i> Zhu, Abstract; <i>id.</i> , Figs. 1-4.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Zhu discloses a massage shaft (5). <i>See</i> Zhu, Abstract; <i>id.</i> , Figs. 1-4.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	<i>See</i> Zhu, Figs. 1-4.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	<i>See</i> Zhu, Figs. 1-4.

1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	See Zhu, Figs. 1-4.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	
2[pre]	A percussive therapy device comprising:	See Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	See Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a handle portion axis;	

2[c]	a housing; and	
2[d]	a push rod assembly comprising:	<i>See Claim Ref. 1[f-1], which is incorporated herein.</i>
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	<i>See Claim Ref. 1[f-2], which is incorporated herein.</i>
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	<i>See Zhu, Figs. 1-4.</i>
2[e]	the dividing plane is normal to the motor	<i>See Zhu, Figs. 1-4.</i>

	axis,	
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
2[g]	the motor is located on a first side of the dividing plane,	<i>See</i> Zhu, Figs. 1-4.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	<i>See</i> Claim Ref. 1[e], which is incorporated herein.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the	<i>See</i> Zhu, Figs. 1-4.

	first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	<i>See</i> Zhu, Figs. 1-4.
4	The percussive therapy system of claim 1, wherein the percussive therapy device comprises a bearing between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	Zhu discloses a bearing (71) between the eccentric shaft (2, 22) and the gangbar (3). <i>See</i> Zhu, Figs. 1-4.
5	The percussive therapy system of claim 4 ¹ , wherein the push rod	<i>See</i> Zhu, Figs. 1-4.

¹ Per April 21, 2026, Certificate of Correction.

	assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	
6	The percussive therapy system of claim 4², wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	See Claim Ref. 5, which is incorporated herein.

² See fn. 1.

18[pre] ³	A percussive therapy device comprising:	See disclosure for Claim Ref. 2[pre], which is incorporated herein.
18[a]	a motor configured to output torque about a motor axis;	See disclosure for Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	
18[c]	a housing; and	
18[d]	a push rod assembly comprising:	See disclosure for Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the	See disclosure for Claim Ref. 2[d-1], which is incorporated herein.

³ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	<i>See disclosure for Claim Ref. 2[d-2], which is incorporated herein.</i>
18[e]	the dividing plane is normal to the motor axis,	<i>See disclosure for Claim Ref. 2[e], which is incorporated herein.</i>
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	<i>See disclosure for Claim Ref. 2[g], which is incorporated herein.</i>
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor	<i>See disclosure for Claim Ref. 2[h], which is incorporated herein.</i>

	is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	See disclosure for Claim Ref. 2[i], which is incorporated herein.
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	See Zhu, Figs. 1-4.

Exhibit B-9
Claim Chart
U.S. Patent No. 12,396,919 in View of CN 2698334Y

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	CN 2698334Y to Lixin (“Lixin”) discloses a massager having a vibrating contact (6). <i>See</i> Lixin, Abstract; <i>id.</i> , Fig. 1.
1[a]	a percussive therapy device comprising:	Lixin discloses a massager. <i>See</i> Lixin, Abstract; <i>id.</i> , Fig. 1.
1[b]	a housing;	Lixin discloses a housing (1). <i>See</i> Lixin, Abstract; <i>id.</i> , Fig. 1.
1[c]	a handle portion;	Lixin discloses a handle (12). <i>See</i> Lixin, Abstract; <i>id.</i> , Fig. 1.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Lixin discloses a motor (2). <i>See</i> Lixin, Abstract; <i>id.</i> , Fig. 1.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	Zhu discloses an eccentric wheel (3). <i>See</i> Lixin, Abstract; <i>id.</i> , Fig. 1.

1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	Zhu discloses a connecting rod (4) connected to a hammer (5). <i>See</i> Lixin, Abstract; <i>id.</i> , Fig. 1.
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Zhu discloses that the hammer (5) reciprocates. <i>See</i> Lixin, Abstract; <i>id.</i> , Fig. 1.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	<i>See</i> Lixin, Fig. 1.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane	<i>See</i> Lixin, Fig. 1.

	in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	See Lixin, Fig. 1.
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Lixin discloses a vibrating contact (6) on the hammer (5). See Lixin, Fig. 1.
2[pre]	A percussive therapy device comprising:	See Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	See Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a	A handle portion will inherently extend along

	handle portion axis;	a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	<i>See</i> Claim Ref. 1[f-1], which is incorporated herein.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	<i>See</i> Claim Ref. 1[f-2], which is incorporated herein.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft;	<i>See</i> Lixin, Fig. 1.

	wherein:	
2[e]	the dividing plane is normal to the motor axis,	See Lixin, Fig. 1.
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
2[g]	the motor is located on a first side of the dividing plane,	See Lixin, Fig. 1.
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	See Claim Ref. 1[e], which is incorporated herein.
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric	See Lixin, Fig. 1.

	shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	<i>See Lixin, Fig. 1.</i>
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Lixin, Fig. 1.</i>
7	The percussive therapy system of claim 1, wherein the device comprises a switch for activating the motor, and the switch is located on a portion of the housing that faces an opposite direction from a distal end of the	Lixin discloses a speed adjustment switch (121). <i>See Lixin, Fig. 1.</i>

	push rod assembly.	
8	The percussive therapy system of claim 1, wherein the device comprises a switch and an electronic display that faces a same direction as the switch, wherein the switch is configured for activating the motor.	Lixin discloses a speed adjustment switch (121). See Lixin, Fig. 1.
9	The percussive therapy system of claim 1, wherein the handle portion extends along a handle portion axis, the reciprocation axis and the handle portion axis both lie on a common plane, and the common plane bisects the housing.	Lixin discloses a speed adjustment switch (121). See Lixin, Fig. 1.
12	The percussive therapy device of claim 2, comprising a backward facing electronic display and a backward	See Claim Ref. 8, which is incorporated herein.

	facing switch configured to activate the motor.	
13	The percussive therapy device of claim 2 ¹ , comprising a switch configured to activate the motor, wherein the switch is located on a portion of the housing that faces an opposite direction from the distal end of the output shaft.	<i>See Claim Ref. 7, which is incorporated herein.</i>
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Claim Ref. 3, which is incorporated herein.</i>
18[pre] ²	A percussive therapy device comprising:	<i>See disclosure for Claim Ref. 2[pre], which is incorporated herein.</i>

¹ See fn. 1.

² Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

18[a]	a motor configured to output torque about a motor axis;	See disclosure for Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	See disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	See disclosure for Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	See disclosure for Claim Ref. 2[d], which is incorporated herein.
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	See disclosure for Claim Ref. 2[d-1], which is incorporated herein.
18[d-2]	a push rod having a proximal end	See disclosure for Claim Ref. 2[d-2], which is

	operatively connected to the motor and a distal end connected to the output shaft; wherein:	incorporated herein.
18[e]	the dividing plane is normal to the motor axis,	<i>See disclosure for Claim Ref. 2[e], which is incorporated herein.</i>
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	<i>See disclosure for Claim Ref. 2[g], which is incorporated herein.</i>
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	<i>See disclosure for Claim Ref. 2[h], which is incorporated herein.</i>
18[i]	the proximal end of the push rod is operatively connected to the motor by the	<i>See disclosure for Claim Ref. 2[i], which is incorporated herein.</i>

	eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	See Lixin, Fig. 1.
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Claim Ref. 3, which is incorporated herein.

EXHIBIT C 1-6

Exhibit C-1
Claim Chart
U.S. Patent No. 12,396,919 in View of US Patent D895,829 S

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	US D895,829 S to Hu (“Hu ’829”) discloses a muscle massage gun. <i>See</i> Hu ’829, Figs. 1-11.
1[a]	a percussive therapy device comprising:	Hu ’829 discloses a muscle massage gun. <i>See</i> Hu ’829, Figs. 1-11.
1[b]	a housing;	Hu ’829 discloses a housing. <i>See</i> Hu ’829, Figs. 1-11.
1[c]	a handle portion;	Hu ’829 discloses a handle portion. <i>See</i> Hu ’829, Figs. 1-11.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Hu ’829 discloses a motor. <i>See</i> Hu ’829, Figs. 1-11.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	

1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	Hu '829 discloses an output shaft that reciprocates. See Hu '829, Figs. 1-11.
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	Hu '829 discloses that the reciprocation axis is transverse to the handle portion. See Hu '829, Figs. 1-11.
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane	

	in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	Hu '829 discloses an obtuse interior angel. <i>See</i> Hu '829, Figs. 1-11.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	Hu '829 discloses an attachment. <i>See</i> Hu '829, Figs. 1-11.
2[pre]	A percussive therapy device comprising:	<i>See</i> Claim Ref. 1[a], which is incorporated herein.
2[a]	a motor configured to output torque about a motor axis;	<i>See</i> Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion extending along a	A handle portion will inherently extend along

	handle portion axis;	a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	<i>See</i> Claim Ref. 1[f-1], which is incorporated herein.
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	<i>See</i> Claim Ref. 1[f-1], which is incorporated herein.
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal	

	end connected to the output shaft; wherein:	
2[e]	the dividing plane is normal to the motor axis,	
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	Hu '829 discloses the handle portion extending at an oblique angle to the reciprocation axis. <i>See</i> Hu '829, Figs. 1-11.
2[g]	the motor is located on a first side of the dividing plane,	
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the	

	push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Hu '829, Figs. 1-11.
11	The percussive therapy system of claim 1, wherein the housing comprises a first portion that extends away from the handle portion and encloses a portion of the push rod assembly, and the housing comprises a	See Hu '829, Figs. 1-11.

	second portion that extends away from the handle portion and the first portion.	
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Hu '829, Figs. 1-11.</i>
15	The percussive therapy device of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See Hu '829, Figs. 1-11.</i>
17	The percussive therapy device of claim 2, wherein the housing comprises a first portion that extends away from the handle portion and encloses the push rod assembly, and the housing comprises a second portion that extends away from the	<i>See Hu '829, Figs. 1-11.</i>

	handle portion and the first portion.	
18[pre] ¹	A percussive therapy device comprising:	<i>See disclosure for Claim Ref. 2[pre], which is incorporated herein.</i>
18[a]	a motor configured to output torque about a motor axis;	<i>See disclosure for Claim Ref. 2[a], which is incorporated herein.</i>
18[b]	a handle portion extending along a handle portion axis;	<i>See disclosure for Claim Ref. 2[b], which is incorporated herein.</i>
18[c]	a housing; and	<i>See disclosure for Claim Ref. 2[c], which is incorporated herein.</i>
18[d]	a push rod assembly comprising:	<i>See disclosure for Claim Ref. 2[d], which is incorporated herein.</i>
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein	<i>See disclosure for Claim Ref. 2[d-1], which is incorporated herein.</i>

¹ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	
18[e]	the dividing plane is normal to the motor axis,	
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Hu '829, Figs. 1-11.
18[g]	the motor is located on a first side of the dividing plane,	
18[h]	the device includes an eccentric shaft that is configured to	

	travel in a circle about the motor axis when the motor is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second	

	location is.	
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Hu '829, Figs. 1-11.</i>
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See Hu '829, Figs. 1-11.</i>

Exhibit C-2
Claim Chart
U.S. Patent No. 12,396,919 in View of US 2019/0159961 A1

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	US 2019/0159961 A1 to Chuang (“Chuang”) discloses a massage device. <i>See</i> Chuang, Abstract; <i>id.</i> , Fig. 2.
1[a]	a percussive therapy device comprising:	<i>See</i> Chuang, Abstract; <i>id.</i> , Fig. 2.
1[b]	a housing;	<i>See</i> Chuang, Abstract; <i>id.</i> , Fig. 2.
1[c]	a handle portion;	<i>See</i> Chuang, Abstract; <i>id.</i> , Fig. 2.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the	

	motor,	
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	
1[f-6]	an interior angle defined between the handle portion and	<i>See Chuang, Abstract; id., Fig. 2.</i>

	the output shaft is obtuse; and	
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	
2[pre]	A percussive therapy device comprising:	<i>See Claim Ref. 1[a], which is incorporated herein.</i>
2[a]	a motor configured to output torque about a motor axis;	<i>See Claim Ref. 1[d], which is incorporated herein.</i>
2[b]	a handle portion extending along a handle portion axis;	A handle portion will inherently extend along a handle portion axis. <i>See also Claim Ref. 1[c], which is incorporated herein.</i>
2[c]	a housing; and	<i>See Claim Ref. 1[b], which is incorporated herein.</i>
2[d]	a push rod assembly comprising:	
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an	

	attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	
2[e]	the dividing plane is normal to the motor axis,	
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Chuang, Abstract; <i>id.</i> , Fig. 2.
2[g]	the motor is located on a first side of the dividing plane,	
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor	

	is active,	
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Chuang, Abstract; <i>id.</i> , Fig. 2.
4	The percussive therapy system of claim 1, wherein the percussive therapy device comprises a bearing	

	between the eccentric shaft and the push rod assembly, the output shaft is centered on the reciprocation axis, and the bearing and the motor are positioned on opposite sides of the reciprocation axis.	
5	The percussive therapy system of claim 4 ¹ , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end coupled to the bearing, the push rod comprises a distal end coupled to the output shaft, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	
6	The percussive therapy system of	See Claim Ref. 5, which is incorporated herein.

¹ Per April 21, 2026, Certificate of Correction.

	claim 4 ² , wherein the push rod assembly comprises a push rod, the push rod comprises a proximal end, the push rod comprises a distal end, and the proximal end of the push rod is farther from the reciprocation axis than the distal end of the push rod is.	
7	The percussive therapy system of claim 1, wherein the device comprises a switch for activating the motor, and the switch is located on a portion of the housing that faces an opposite direction from a distal end of the push rod assembly.	Chuang discloses an adjustment module (9). <i>See</i> Chuang, Abstract; <i>id.</i> , Fig. 2.
8	The percussive therapy system of claim 1, wherein the device comprises a switch and an electronic display that faces a	Chuang discloses an adjustment module (9). <i>See</i> Chuang, Abstract; <i>id.</i> , Fig. 2.

² *See* fn. 1.

	same direction as the switch, wherein the switch is configured for activating the motor.	
9	The percussive therapy system of claim 1, wherein the handle portion extends along a handle portion axis, the reciprocation axis and the handle portion axis both lie on a common plane, and the common plane bisects the housing.	<i>See Chuang, Abstract; id., Fig. 2.</i>
12	The percussive therapy device of claim 2, comprising a backward facing electronic display and a backward facing switch configured to activate the motor.	<i>See Claim Ref. 8, which is incorporated herein.</i>
13	The percussive therapy device of claim 2 ³ , comprising a switch configured to activate the motor,	<i>See Claim Ref. 7, which is incorporated herein.</i>

³ See fn. 1.

	wherein the switch is located on a portion of the housing that faces an opposite direction from the distal end of the output shaft.	
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Claim Ref. 3, which is incorporated herein.
15	The percussive therapy device of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	See Chuang, Abstract; <i>id.</i> , Fig. 2.
18[pre] ⁴	A percussive therapy device comprising:	See disclosure for Claim Ref. 2[pre], which is incorporated herein.
18[a]	a motor configured to output torque about a motor axis;	See disclosure for Claim Ref. 2[a], which is incorporated herein.
18[b]	a handle portion extending along a handle portion axis;	See disclosure for Claim Ref. 2[b], which is incorporated herein.

⁴ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

18[c]	a housing; and	See disclosure for Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	
18[e]	the dividing plane is normal to the motor axis,	
18[f]	the handle portion axis extends at an	See Chuang, Abstract; <i>id.</i> , Fig. 2.

	oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	
18[g]	the motor is located on a first side of the dividing plane,	
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the	

	push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Chuang, Abstract; <i>id.</i> , Fig. 2.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	See Chuang, Abstract; <i>id.</i> , Fig. 2.

Exhibit C-3
Claim Chart
U.S. Patent No. 12,396,919 in View of US Patent No. 1,245,860

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	
1[a]	a percussive therapy device comprising:	
1[b]	a housing;	U.S. Patent No. 1,245,860 to Black et al. (“Black”) discloses a housing. <i>See</i> Black Figs. 1, 3.
1[c]	a handle portion;	Black discloses a handle portion (6). <i>See</i> Black Figs. 1, 3.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the	

	motor; and	
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from	

	the dividing plane in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	Black discloses an interior angle defined between the handle portion (6) and the output shaft (3) is obtuse. <i>See</i> Black Figs. 1, 3.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	<i>See</i> Black Figs. 1, 3.
2[pre]	A percussive therapy device comprising:	
2[a]	a motor configured to output torque about a motor axis;	
2[b]	a handle portion	A handle portion will inherently extend along

	extending along a handle portion axis;	a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft;	

	wherein:	
2[e]	the dividing plane is normal to the motor axis,	
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Black Figs. 1, 3.
2[g]	the motor is located on a first side of the dividing plane,	
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric	

	shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Black Figs. 1, 3.
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Black Figs. 1, 3.
15	The percussive therapy device of claim 2, wherein an interior angle	See Black Figs. 1, 3.

	defined between the handle portion and the output shaft is obtuse.	
18[pre] ¹	A percussive therapy device comprising:	
18[a]	a motor configured to output torque about a motor axis;	
18[b]	a handle portion extending along a handle portion axis;	See disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	See disclosure for Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a	

¹ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	
18[e]	the dividing plane is normal to the motor axis,	
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Black Figs. 1, 3.
18[g]	the motor is located on a first side of the dividing plane,	

18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther	

	from the reciprocation axis than the second location is.	
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Black Figs. 1, 3.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	See Black Figs. 1, 3.

Exhibit C-4
Claim Chart
U.S. Patent No. 12,396,919 in View of US Patent No. 5,618,315

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	
1[a]	a percussive therapy device comprising:	
1[b]	a housing;	U.S. Patent No. 5,618,315 to Elliott (“Elliott”) discloses a housing (12). <i>See</i> Elliott, Figs. 1-2.
1[c]	a handle portion;	Elliott discloses a handle (14). <i>See</i> Elliott, Figs. 1-2
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the motor; and	

1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from the dividing plane	

	in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	Elliott discloses an interior angle defined between the handle portion (14) and the output shaft (10) is obtuse. <i>See</i> Elliott, Figs. 1-2
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	
2[pre]	A percussive therapy device comprising:	
2[a]	a motor configured to output torque about a motor axis;	
2[b]	a handle portion extending along a	A handle portion will inherently extend along

	handle portion axis;	a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	See Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal	

	end connected to the output shaft; wherein:	
2[e]	the dividing plane is normal to the motor axis,	
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	Elliott discloses that the handle portion (6) axis extends at an oblique angle to the reciprocation axis (along 10). <i>See</i> Elliott, Figs. 1-2.
2[g]	the motor is located on a first side of the dividing plane,	
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the	

	push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Elliott, Figs. 1-2.
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Elliott, Figs. 1-2.
15	The percussive therapy device	See Elliott, Figs. 1-2.

	of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	
18[pre] ¹	A percussive therapy device comprising:	
18[a]	a motor configured to output torque about a motor axis;	
18[b]	a handle portion extending along a handle portion axis;	See disclosure for Claim Ref. 2[b], which is incorporated herein.
18[c]	a housing; and	See disclosure for Claim Ref. 2[c], which is incorporated herein.
18[d]	a push rod assembly comprising:	
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a	

¹ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	
18[e]	the dividing plane is normal to the motor axis,	
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Elliott, Figs. 1-2.
18[g]	the motor is located on a first side of the dividing plane,	

18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther	

	from the reciprocation axis than the second location is.	
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Elliott, Figs. 1-2.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	See Elliott, Figs. 1-2.

Exhibit C-5
Claim Chart
U.S. Patent No. 12,396,919 in View of US Patent No. 9,696,362 B2

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	
1[a]	a percussive therapy device comprising:	
1[b]	a housing;	US Patent No. 9,696,362 B2 to Nguyen et al. (“Nguyen”) discloses a housing. <i>See</i> Nguyen, Figs. 1, 7-9.
1[c]	a handle portion;	Nguyen discloses a handle. <i>See</i> Nguyen, Figs. 1, 7-9.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the	

	motor; and	
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from	

	the dividing plane in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	Nguyen discloses an interior angle defined between the handle portion and the output shaft is obtuse. See Nguyen, Fig. 8.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	
2[pre]	A percussive therapy device comprising:	
2[a]	a motor configured to output torque about a motor axis;	
2[b]	a handle portion	A handle portion will inherently extend along

	extending along a handle portion axis;	a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft;	

	wherein:	
2[e]	the dividing plane is normal to the motor axis,	
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Nguyen, Fig. 8.
2[g]	the motor is located on a first side of the dividing plane,	
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric	

	shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Nguyen, Fig. 8.</i>
10	The percussive therapy system of claim 1, comprising a battery housed in the handle portion.	<i>See Nguyen, Figs. 4-8.</i>
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away	<i>See Nguyen, Fig. 8.</i>

	from the reciprocation axis.	
15	The percussive therapy device of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See</i> Nguyen, Fig. 8.
16	The percussive therapy device of claim 2, comprising a battery and a handle, wherein the handle comprises the handle portion and the battery is housed in the handle.	<i>See</i> Nguyen, Figs. 4-8.
18[pre] ¹	A percussive therapy device comprising:	
18[a]	a motor configured to output torque about a motor axis;	
18[b]	a handle portion	<i>See</i> disclosure for Claim Ref. 2[b], which is

¹ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	extending along a handle portion axis;	incorporated herein.
18[c]	a housing; and	<i>See disclosure for Claim Ref. 2[c], which is incorporated herein.</i>
18[d]	a push rod assembly comprising:	
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	

18[e]	the dividing plane is normal to the motor axis,	
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Nguyen, Fig. 8.
18[g]	the motor is located on a first side of the dividing plane,	
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing	

	plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Nguyen, Fig. 8.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle	See Nguyen, Fig. 8.

	portion and the output shaft is obtuse.	
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Exhibit C-6
Claim Chart

U.S. Patent No. 12,396,919 in View of US Patent No. 10,821,577 B2

Claim Ref.	Claim Language	Exemplary Disclosure(s)
1[pre]	A percussive therapy system comprising:	
1[a]	a percussive therapy device comprising:	
1[b]	a housing;	US Patent No. 10,821,577 B2 to Kumagai et al. (“Kumagai”) discloses a housing (2). <i>See</i> Kumagai, Figs. 1, 7-9.
1[c]	a handle portion;	Kumagai discloses a handle (6). <i>See</i> Kumagai, Figs. 1, 3, 12.
1[d]	a motor positioned in the housing and configured to output torque about a motor axis;	Kumagai discloses a motor (11). <i>See</i> Kumagai, Figs. 1, 3, 12.
1[e]	an eccentric shaft configured to travel in a circle about the motor axis in response to activation of the	

	motor; and	
1[f-1]	a push rod assembly operatively connected to the motor and configured to reciprocate in response to activation of the motor,	
1[f-2]	wherein the push rod assembly comprises an output shaft configured to travel along a reciprocation axis when the push rod assembly reciprocates,	
1[f-3]	the reciprocation axis extends transverse to the handle portion on a dividing plane normal to the motor axis,	
1[f-4]	a proximal end of the push rod assembly is connected to the eccentric shaft at a location offset from	

	the dividing plane in a first direction,	
1[f-5]	the motor extends transverse to the handle portion and away from the dividing plane in a second direction opposite the first direction, and	
1[f-6]	an interior angle defined between the handle portion and the output shaft is obtuse; and	Kumagai discloses an interior angle defined between the handle portion (6) and the output shaft (17) is obtuse. <i>See</i> Kumagai, Figs. 1, 3, 12.
1[g]	an attachment configured to be operatively connected to the output shaft of the percussive therapy device.	
2[pre]	A percussive therapy device comprising:	
2[a]	a motor configured to output torque about a motor axis;	<i>See also</i> Claim Ref. 1[d], which is incorporated herein.
2[b]	a handle portion	A handle portion will inherently extend along

	extending along a handle portion axis;	a handle portion axis. <i>See also</i> Claim Ref. 1[c], which is incorporated herein.
2[c]	a housing; and	<i>See</i> Claim Ref. 1[b], which is incorporated herein.
2[d]	a push rod assembly comprising:	
2[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
2[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft;	

	wherein:	
2[e]	the dividing plane is normal to the motor axis,	
2[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Kumagai, Figs. 1, 3, 12.
2[g]	the motor is located on a first side of the dividing plane,	
2[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
2[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric	

	shaft on a second side of the dividing plane that is opposite from the first side of the dividing plane, and	
2[j]	the proximal end of the push rod is farther from the reciprocation axis than the distal end is.	
3	The percussive therapy system of claim 1, wherein the handle portion extends longitudinally away from the reciprocation axis.	<i>See Kumagai, Figs. 1, 3, 12.</i>
10	The percussive therapy system of claim 1, comprising a battery housed in the handle portion.	<i>See Kumagai, Figs. 1, 3, 12.</i>
14	The percussive therapy device of claim 2, wherein the handle portion extends longitudinally away	<i>See Kumagai, Figs. 1, 3, 12.</i>

	from the reciprocation axis.	
15	The percussive therapy device of claim 2, wherein an interior angle defined between the handle portion and the output shaft is obtuse.	<i>See Kumagai, Figs. 1, 3, 12.</i>
16	The percussive therapy device of claim 2, comprising a battery and a handle, wherein the handle comprises the handle portion and the battery is housed in the handle.	<i>See Kumagai, Figs. 1, 3, 12.</i>
18[pre] ¹	A percussive therapy device comprising:	
18[a]	a motor configured to output torque about a motor axis;	
18[b]	a handle portion	<i>See disclosure for Claim Ref. 2[b], which is</i>

¹ Claim Elements 18[pre]-18[i] are identical to Claim Elements 2[pre]-2[i].

	extending along a handle portion axis;	incorporated herein.
18[c]	a housing; and	<i>See disclosure for Claim Ref. 2[c], which is incorporated herein.</i>
18[d]	a push rod assembly comprising:	
18[d-1]	an output shaft configured to reciprocate along a reciprocation axis in response to activation of the motor and having a distal end that comprises a connector for an attachment, wherein the output shaft is centered on the reciprocation axis and the reciprocation axis extends on a dividing plane; and	
18[d-2]	a push rod having a proximal end operatively connected to the motor and a distal end connected to the output shaft; wherein:	

18[e]	the dividing plane is normal to the motor axis,	
18[f]	the handle portion axis extends at an oblique angle to the reciprocation axis and intersects the reciprocation axis and the motor axis,	See Kumagai, Figs. 1, 3, 12.
18[g]	the motor is located on a first side of the dividing plane,	
18[h]	the device includes an eccentric shaft that is configured to travel in a circle about the motor axis when the motor is active,	
18[i]	the proximal end of the push rod is operatively connected to the motor by the eccentric shaft, wherein the proximal end of the push rod is coupled to the eccentric shaft on a second side of the dividing	

	plane that is opposite from the first side of the dividing plane, and	
18[j]	the proximal end of the push rod is coupled to the eccentric shaft at a first location, the distal end of the push rod is connected to the output shaft at a second location, and the first location is farther from the reciprocation axis than the second location is.	
19	The percussive therapy device of claim 18, wherein the handle portion extends longitudinally away from the reciprocation axis.	See Kumagai, Figs. 1, 3, 12.
20	The percussive therapy device of claim 18, wherein an interior angle defined between the handle	See Kumagai, Figs. 1, 3, 12.

	portion and the output shaft is obtuse.	
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1 **CERTIFICATE OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years, and
3 not a party to the within action. My business address is PROCOPIO, CORY,
4 HARGREAVES & SAVITCH LLP, 525 "B" Street, Suite 2200, San Diego,
5 California 92101. On July 6, 2026, I served the within documents:

6 **DEFENDANT HYPER ICE, INC.'S INVALIDITY CONTENTIONS**

- 7 ☒ **BY E-MAIL OR ELECTRONIC SERVICE** based upon court order or an
8 agreement of the parties to accept service by electronic transmission, by
9 electronically mailing the document(s) listed above to the e-mail address(es) set
10 forth below, or as stated on the attached service list and/or by electronically
11 notifying the parties set forth below that the document(s) listed above can be
12 located and downloaded from the hyperlink provided. No error was received,
13 within a reasonable time after the transmission, nor any electronic message or
14 other indication that the transmission was unsuccessful.

15 **Kyle B. Fleming**

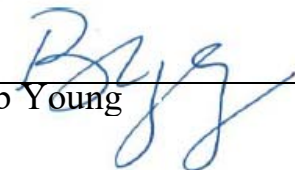
16 Email: kfleming@rennerotto.com

17 **Jordan Raphael**

18 Email: jraphael@byronraphael.com

- 19 ☒ *(Federal)* I declare under penalty of perjury under the laws of the United States
20 that foregoing is true and correct.

21 Executed on July 6, 2026, at San Diego, California.

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Barb Young