Fed. Circ. Reverses Alice Ax Of Dumbbell Patent In IFit Case

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Law360 (August 11, 2025, 8:25 PM EDT) -- The Federal Circuit decided on Monday that a Utah federal judge wrongly declared a PowerBlock Holdings Inc. dumbbell patent asserted against iFit Inc. to be invalid for claiming only an abstract idea, holding it instead covers a specific type of dumbbell that is patent eligible.

In a <u>precedential opinion</u>, the appeals court reversed a 2023 holding by U.S. District Judge Jill Parrish, who granted iFit's motion to dismiss in a dispute between the exercise equipment rivals. She found PowerBlock's patent failed the eligibility test from the <u>U.S.</u>

<u>Supreme Court's 2014 Alice v. CLS Bank</u> • case.

While the lower court said the patent was directed to the abstract idea of "automated weight stacking" and would prohibit anyone else from patenting other weight selection and adjustment systems, the Federal Circuit said: "We reach a different conclusion."

The appeals court held that although the key claim of the patent is broad, "we do not agree that it provides no meaningful limitations on how to accomplish automated weight stacking such that it would 'preempt any weight selection and adjustment system."

The claim "is limited to a particular type of dumbbell," the Federal Circuit said, so it provides "enough specificity and structure" to conclude that it "is not directed to an abstract idea." The court reversed the invalidity determination and remanded the case for further proceedings.

The patent covers a motorized dumbbell system where users can select and adjust weight plates using mechanical components. The district judge held that it is only directed to an abstract idea and doesn't add anything to make the invention patent eligible.

The Federal Circuit said "the crux of the district court's erroneous" analysis was the finding

that the patent doesn't cover a particular invention but only the general result of automating the process of stacking weights.

The patent in fact covers a specific system involving nested weights, a movable selector, and an electric motor that moves the weight plates, the appeals court ruled.

The Federal Circuit rejected iFit's argument that the patent doesn't describe how that system represents an improvement in dumbbell technology, holding that it explains how the motor and the selector move the plates, meaning the patent is more than just an abstract idea.

The appeals court distinguished the case from two others for which it rendered decisions in 2019, cited by the lower court and iFit, where patents were found invalid under Alice.

One of those rulings involved a University of Florida patent on managing medical patient data that was asserted against <u>General Electric Co.</u>, which the appeals court said <u>merely automated</u> pen and paper charts and was "a quintessential 'do it on a computer' patent."

The Federal Circuit said that in contrast, PowerBlock's patent covers a "concrete thing" with mechanical components, akin to a GPS satellite patent that the appeals court upheld in a 2010 ruling.

The other <u>2019 case</u> involved a <u>Chamberlain Group Inc</u>. wireless garage door opener patent asserted against <u>Techtronic Industries Co</u>. Ltd., which the Federal Circuit said only covered a way of wirelessly communicating information. Unlike that one, the PowerBlock patent is sufficiently focused on a mechanical improvement, the court said.

The Federal Circuit noted that iFit contended it should ignore language in the patent describing conventional dumbbells, arguing repeating elements of earlier inventions don't imbue the patent with "any specific means or method." The appeals court rejected this contention.

The court further said that patent claims must be analyzed as a whole to determine eligibility. It quoted the Supreme Court's 1981 decision known as Diamond v. Diehr, which held that when considering patent eligibility, it is "inappropriate to dissect the claims into old and new elements and then to ignore the presence of the old elements in the

analysis."

"We decline iFit's invitation to read out or ignore limitations ... merely because they can be found in the prior art," the Federal Circuit said. In a footnote, it added: "We caution parties and tribunals not to conflate the separate novelty and obviousness inquiries" with the patent eligibility inquiry.

PowerBlock attorneys Joshua Hartman and Thomas Leach of Merchant & Gould PC said in a joint emailed statement that they are pleased with the Federal Circuit's decision.

"PowerBlock has been at the forefront of innovation in the exercise technologies space, and the court's conclusion rights a wrong that will enable it to protect its innovations against knowing infringement," the attorneys said.

They added that "the court's decision provides useful guidance regarding the patentability of mechanical inventions and clarifies the analytical differences between patent eligibility and anticipation/obviousness."

An attorney and a representative for iFit could not immediately be reached for comment on Monday.

The patent at issue is U.S. Patent No. <u>7,578,771</u>.

Judges Kara Farnandez Stoll and Richard Taranto sat on the panel for the Federal Circuit, along with Judge Mark Scarsi of the <u>Central District of California</u>, sitting by designation.

PowerBlock is represented by Joshua Hartman, Thomas Leach and Michael Erbele of Merchant & Gould PC.

iFit is represented by Mark Ford, C.J. Veverka and L. Rex Sears of <u>Maschoff Brennan PLLC</u>.

The case is PowerBlock Holdings Inc. v. iFit Inc., case number <u>24-1177</u>, in the <u>U.S. Court of</u> Appeals for the Federal Circuit.

--Editing by Philip Shea.