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Federal Circuit Lifts § 101 Barrier on Smart Dumbbells

The Patent Playbook on **August 25, 2025**

On August 11, 2025, the Federal Circuit reversed the District of Utah's ruling that all but one of the claims in PowerBlock Holdings, Inc.'s U.S. Patent No. 7,578,771 were invalid under 35 U.S.C. § 101. *PowerBlock Holdings, Inc., v. iFit, Inc.* ("Appellate Op."). In September 2023, the District Court found all but claim 19 failed the *Alice* test as they did not "add significantly more than the abstract idea of the end-result of an automated sectorized dumbbell. *PowerBlock Holdings, Inc. v. iFit, Inc.*, 2023 WL 6377781, at *7 (D. Utah Sept. 29, 2023) ("Trial Op."). The claims at issue are generally directed to an adjustable dumbbell system that uses an electric motor to couple additional weights to the dumbbell—allowing the user to increase or decrease the weight automatically. On appeal, the Federal Circuit reviewed the matter *de novo*.

Starting with *Alice* step one, the Court held that the district court erred by determining Claim 1 was directed to the abstract idea of "automated weight stacking" because it consisted of "two or three 'generic' components." Appellate Op. at 8. The Court held, rather, that the claims are directed to a specific type of dumbbell, requires an electric motor "operatively connected to the selector" which physically moves the weight selector based on inputs from the user. *Id.* Moreover, the motor must couple a select number of plates on the left side of the dumbbell and a corresponding amount of weight plates on the right side of the dumbbell. *Id.* at 10. This put the '771 Patent squarely as an eligible mechanical invention. *Id.* at 9. In comparison, the district court analogized what the Court called a "quintessential 'do it on a computer' patent" that automated pen and paper methodologies. *Id.* at 9.

For its part, iFit urged the Court to ignore claim limitations that involved conventional components of sectorized dumbbells, seeming to conflate § 102 and § 101. *Id.* at 10. The Court disagreed, stressing the necessity of analyzing claims "in their entirety" including any conventional, prior art components when conducting Step One. *Id.* at 10. In light of this, it held claim 1 directed toward the patent-eligible idea of a mechanical invention that "as a whole, advantageously automates sectorized dumbbell weights tacking." Satisfied on Step One, the Court ceased its analysis. The remaining invalidated claims were also resurrected because the parties argued the claims (ironically) in their entirety rather than separately, "so they rise or fall together." *Id.* at 1

Parties can take away several helpful reminders from this opinion. Most notably, perhaps, is the Court's urge to "not [] conflate the separate novelty and obviousness inquiries…with the step one inquiry." Appellate Op. at 11. It is also imperative to not only argue each claim individually—to the extent feasible—but also as a whole, regardless of novelty, in line with Supreme Court guidance. *See e.g.*, *Diamond v. Diehr* ("[I]t [is] inappropriate to dissect the claims into old and new elements and then to ignore the presence of the old elements in the [§ 101] analysis."). Further, it is not enough to argue that a claim is directed toward automation of generic processes without detailing the specific limitations.

This decision joins a growing line of cases recognizing that mechanical and electromechanical inventions should not be shoehorned into the "abstract idea" category. For patent owners, it's a reminder that eligibility challenges can be beaten by showing how the claims recite specific structures and methods — not just results.

If you have questions about how this decision affects your litigation strategies, we're here to help.

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