

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

OURARING INC.,

*Plaintiff,*

v.

REEBOK INTERNATIONAL LIMITED,  
RILUK IPCO LIMITED, THE ORIGINAL  
FIT FACTORY LTD., and TRUCONNECT  
LTD.,

*Defendants.*

Civil Action No. 2:25-cv-1129

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Ouraring Inc. (“Oura”), by and through its undersigned counsel, files this complaint under 35 U.S.C. § 271 for patent infringement against Defendants Reebok International Limited, RILUK IPCO Limited, (together, “Reebok”), The Original Fit Factory Ltd. (“TOFF”), and Truconnect Ltd. (collectively, “Defendants”) and further alleges as follows, upon actual knowledge with respect to itself and its own acts, and upon information and belief as to all other matters.

**OVERVIEW**

1. This is an action for patent infringement on behalf of Oura. Originally founded in Finland in 2013, Oura is a pioneer in developing smart ring technology that allows users to take control of their health. Oura set out to develop a product that accurately provides personalized insight into a user’s fitness and health by monitoring heart rate, temperature variations, blood oxygen levels, and movement during both sleep and active periods. Unlike other wearables (*e.g.*, wrist wearables) that are typically bulky and can be intrusive or interfere with a person’s daily life

(e.g., uncomfortable to wear during sleep or for extended periods of time), Oura developed its product in an innovative, attractive, and user-friendly form factor—a ring.

2. Since its founding, Oura has released four generations of its Oura Ring: Gen. 1 (2015), Gen. 2 (2018), Gen. 3 (2021), and Gen. 4 (2024).



Locke Hughes, *Inside the Ring: The Making of Oura Ring 4*, The Pulse Blog, <https://ouraring.com/blog/inside-the-ring-oura-ring-4/> (last visited October 21, 2025).

3. Backed by over a decade of experience and research, the Oura Ring has received numerous awards for its innovation, including the 2022 Best Sleep Tracker by Men’s Health Magazine, 2023 Health Fitness Award, Cosmopolitan Best Overall Fitness Ring for 2024, Women’s Health Magazine Sleep Tracker 2024, New York Times Best Sleep Tracker, WIRED Best Ring Fitness Tracker 2023, Forbes Best Sleep Tracker, among a number of other recognitions. Additionally, Oura ranked 33rd in CNBC’s 2023 Disruptor 50 list, which ranks 50 of the most innovative private companies worldwide. In the 2025 Disruptor 50 list, CNBC ranked Oura as the 23rd most innovative private company, “which began transforming the list in 2023, and hasn’t slowed down since.” See <https://www.cnbc.com/2025/06/10/oura-cnbc-disruptor-50.html> (last visited October 21, 2025). Future crowned the Oura Ring as the “Best Recovery Tech” in the 2025 Future Innovation Awards. Also in 2025, TIME Magazine recognized Oura as a Pioneer in the TIME100 list of the “world’s most influential businesses of the year,” and TIME Magazine recently named the Oura Ring Gen. 4 as one of “The Best Inventions of 2025.” See

<https://time.com/collections/time100-companies-2025/?filters=pioneers;> *see also* <https://time.com/collections/best-inventions-2025/> (last visited October 21, 2025). The Oura Ring was also selected by the National Basketball Association, the Ultimate Fighting Championship, and other organizations to equip their athletes with the most accurate and credible health technology. *See* <https://www.si.com/nba/2020/07/01/oura-ring-nba-restart-orlando-coronavirus> (last visited October 21, 2025); *see also* <https://www.ufc.com/news/oura-official-health-wearable-ufc-performance-institute> (last visited October 21, 2025).

4. Based on Oura's business relationship with the U.S. military, Oura is expanding its manufacturing operations into Texas. Specifically, Oura is opening a factory, expected to be fully operational in 2026, in Fort Worth, Texas to meet the needs of its contracts. *See* <https://ouraring.com/blog/oura-us-department-of-defense/> (last visited October 22, 2025).

5. Oura's success has attracted copycats seeking to benefit from the market that Oura built through innovation and hard work. As Oura has grown, so too has its protection of its intellectual property. Oura has amassed a patent portfolio containing over a hundred patents worldwide related to the structure, design, and manufacturing of smart ring wearables and enforces its patents through licensing and/or litigation. Other smart ring manufacturers have recognized the value of Oura's intellectual property and have obtained a license from Oura in the recent past, including well-known smart ring manufacturers.

6. Oura is forced to bring this action against Defendants as a result of Defendants' knowing and ongoing infringement of Oura's patents as further described herein

7. Prior to entering the smart ring wearable market, Defendants was aware of Oura's success and set out on a campaign targeting Oura's products, which are protected by its intellectual property. *See* <https://ouraring.com/intellectual-property-notice>.

8. For example, Defendants market its Reebok Smart Ring to track sleep, movement, and recovery on the Reebok Fitness App:



**Reebok Smart Ring**

9. The Reebok Smart Ring is intended to be an imitation of the Oura Ring in its appearance, structure, and functionalities. For example, the Reebok Smart Ring includes the same sensors as those offered by the Oura Ring, such as an infrared photoplethysmography (PPG) sensor, skin temperature sensor, optical electronics, and a 3D accelerometer.<sup>1</sup> Further, the Reebok Smart Ring comprises a curved battery component similar to the Oura Ring. The selected material for the Reebok Smart Ring is also the same as the Oura Ring: durable titanium with a non-allergenic, non-metallic inner molding. And Defendants offer similar colors (matte black, matte silver, shiny gold) as Oura (e.g., silver, black, stealth, gold, and rose gold), all of which results in the Reebok Smart Ring having an identical look and feel to the Oura Ring.

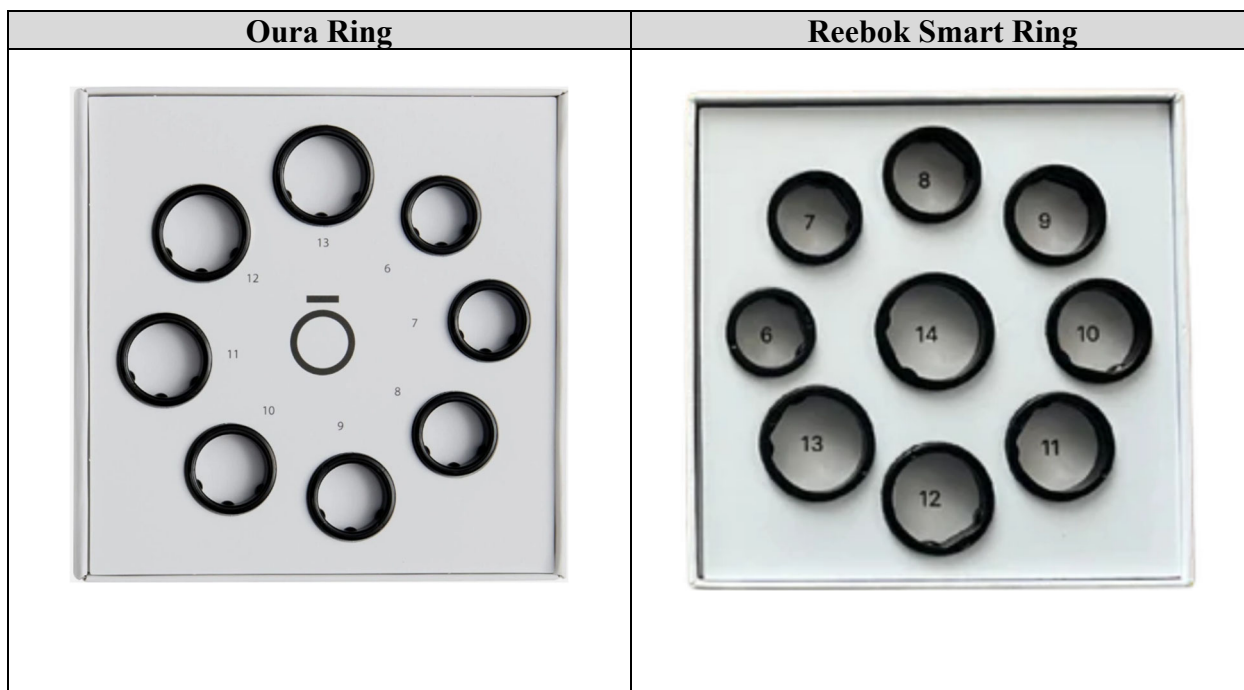
10. A cumulative result is a product attempting to mimic Oura Ring:

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<sup>1</sup> Compare <https://www.reebok.com/products/reebok-reebok-smart-ring-matte-black> (last visited November 10, 2025), <https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 10, 2025), <https://www.reeboksmartring.com/> (last visited November 10, 2025), and <https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 10, 2025) with <https://support.ouraring.com/hc/en-us/articles/34114690317075-Oura-Ring-4-vs-Oura-Ring-Gen3> (last visited November 10, 2025), <https://support.ouraring.com/hc/en-us/articles/4409072131091-Oura-Ring-Generation-3> (last visited November 10, 2025), and <https://ouraring.com/store/rings> (last visited November 10, 2025).



11. Reebok’s attempt to mimic Oura even extends to the layout and design of the sizing kit of Oura:



12. The Reebok Smart Ring, which amounts nothing more than an imitation product, is now offered for sale to customers in the United States.

13. Moreover, on information and belief, Defendants knew of the U.S. Patent No. 11,868,178 (“the ’178 Patent”) due to Oura’s assertion of the patent in a widely publicized investigation at the International Trade Commission (ITC) against two of Oura’s competitors,

Ultrahuman and RingConn. *See* <https://ouraring.com/blog/oura-itc-case/> (last visited November 10, 2025). Oura filed an ITC complaint in March 2024, asserting infringement of the '178 Patent by Ultrahuman and RingConn, and the ITC instituted the investigation on April 12, 2024. In April 2025, the ITC issued its initial determination finding that Ultrahuman and RingConn infringed all asserted claims of the '178 Patent and that all asserted claims of the '178 Patent were valid. In August 2025, the ITC issued exclusion and cease-and-desist orders banning all Ultrahuman and RingConn smart rings from being imported and sold in the U.S. effective October 21, 2025. As the Presidential review period is now complete, the ITC's final order enforces the exclusion and cease-and-desist orders against Ultrahuman and RingConn. *See id.* The ITC case was widely publicized in the industry. *See, e.g.,* <https://www.businesswire.com/news/home/20250909387922/en/U.S.-International-Trade-Commission-Rules-in-Favor-of-URA-in-Patent-Case-Against-Ultrahuman-and-RingConn> (last visited November 10, 2025).

14. To protect its patent rights, Oura now files this Complaint for patent infringement. Oura is willing to engage in licensing discussions with Defendants, but Defendants continue to infringe Oura's global patent rights.

### **PARTIES**

15. Plaintiff Ouraring Inc. is a Delaware corporation with its principal place of business at 222 Kearny Street, San Francisco, California 94108.

16. Ouraring Inc. is a wholly owned subsidiary of Oura Health Oy, a Finnish company founded in 2013.

17. On information and belief, Defendant Reebok International Limited is an entity organized under the laws of the United Kingdom. On information and belief, Reebok International

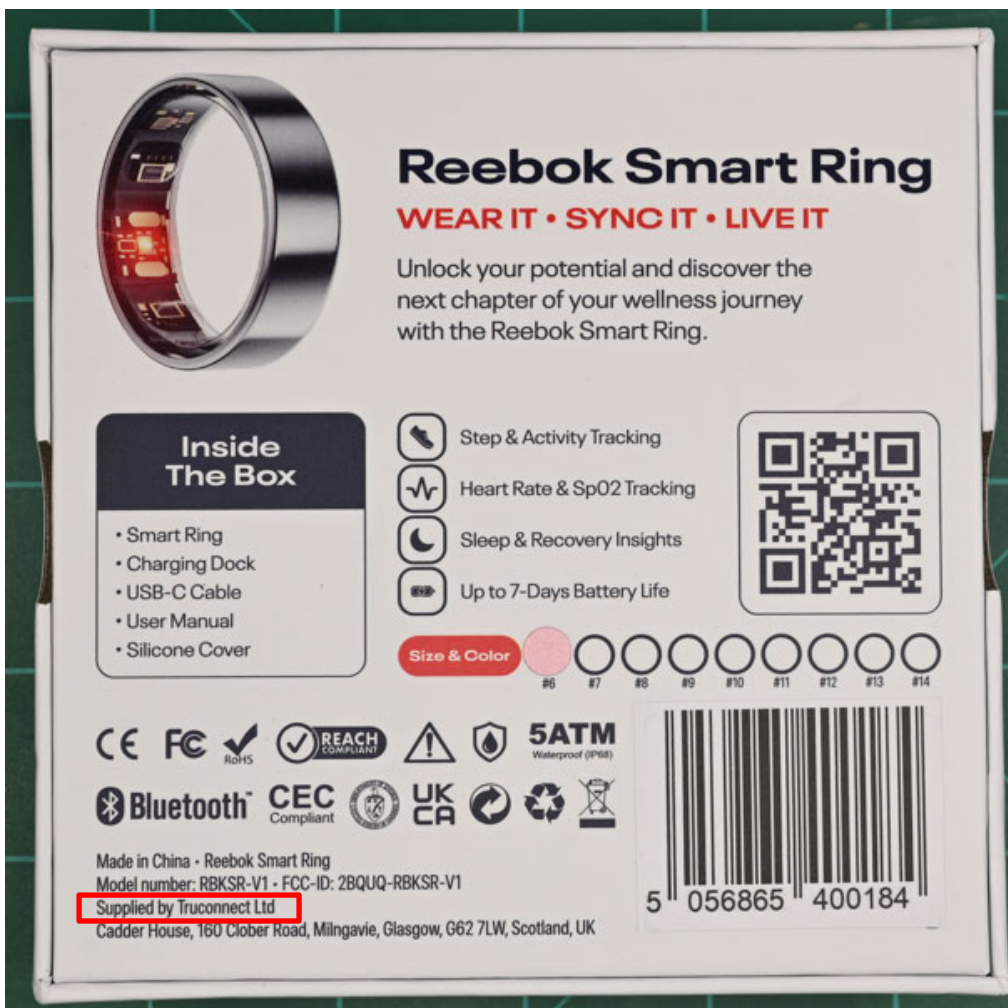
Limited has a registered office located at 3rd Floor 1 Ashley Road, Altrincham, Cheshire, United Kingdom, WA14 D2T.

18. On information and belief, Defendant RILUK IPCO Limited is an entity organized under the laws of the United Kingdom. On information and belief, RILUK IPCO Limited has a registered office located at 3rd Floor 1 Ashley Road, Altrincham, Cheshire, United Kingdom, WA14 D2T.

19. On information and belief, Defendant The Original Fit Factory Ltd. is an entity organized under the laws of the United Kingdom. On information and belief, TOFF has a registered office located at Canniesburn Gate 10 Canniesburn Drive, Bearsden, Glasgow, Scotland, G61 1BF.

20. On information and belief, Defendant Truconnect Ltd. is an entity organized under the laws of the United Kingdom. On information and belief, Truconnect Ltd. has a registered office located at Canniesburn Gate 10 Canniesburn Drive, Bearsden, Glasgow, Scotland, G61 1BF.

21. As discussed further herein, the Accused Product, including the Reebok Smart Ring, is “supplied by Truconnect Ltd.”



22. Pursuant to a publicly available notification, dated March 1, 2023, TOFF maintains “75% or more” of the “ownership of shares” of Truconnect Ltd.

# TRUCONNECT LTD

Company number **SC760544**[Follow this company](#)[File for this company](#)

Overview	Filing history	People	Registers	More
Officers <u>Persons with significant control</u>				
<b>1 active person with significant control / 0 active statements</b>				
<b>The Original Fit Factory Limited</b> <b>ACTIVE</b>				
Correspondence address <b>Cadder House, 160 Clober Road, Milngavie, Glasgow, Scotland, G62 7LW</b>				
Notified on <b>1 March 2023</b>				
Governing law <b>Companies Act 2006</b>		Legal form <b>Private Limited Company</b>		
Place registered <b>Registrar Of Companies For Scotland</b>		Registration number <b>760544</b>		
Incorporated in <b>Scotland</b>				
Nature of control <b>Ownership of shares - 75% or more</b>				

See <https://find-and-update.company-information.service.gov.uk/company/SC760544/persons-with-significant-control> (last visited November 13, 2025).

23. Further, TOFF's website lists the "Reebok Fitness App" and the "Reebok Smart Ring" as part of TOFF's brands. See <https://theoriginalfitfactory.com/>; <https://theoriginalfitfactory.com/brands/reebok-fitness-app/> (last visited November 13, 2025); <https://theoriginalfitfactory.com/brands/reebok-smart-ring/> (last visited November 13, 2025). According to a September 15, 2025 article announcing a forthcoming business transaction, "[t]he Original Fit Factory's core businesses are well-established in the technology, fitness and

wellbeing, and their Innovations Division includes the Reebok Fitness App and the Reebok Smart Ring.” *See* <https://www.globenewswire.com/news-release/2025/09/16/3150465/0/en/ESH-Acquisition-Corp-and-The-Original-Fit-Factory-Ltd-Announce-the-Execution-of-a-Business-Combination-Agreement.html> (last visited November 13, 2025).

24. According to the “Terms & Conditions” for the Reebok Smart Ring, TOFF is “a licensee of RILUK IPCO Limited, a member of the Reebok group.” *See* <https://www.reeboksmartring.com/pages/terms-conditions> (last visited November 13, 2025).

25. Pursuant to a publicly available notification, dated March 3, 2022, Reebok International Limited owns “75% or more” of RILUK IPCO Limited while maintaining “75% or more” of the “ownership of voting rights” as well as the “right to appoint or remove directors.”

## RILUK IPCO LIMITED

Company number **13637641**

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[Overview](#) [Filing history](#) [People](#) [More](#)

[Officers](#) [Persons with significant control](#)

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**1 active person with significant control / 0 active statements**

**Reebok International Limited** ACTIVE

Correspondence address  
**3rd Floor, 1 Ashley Road, Altrincham, Cheshire, United Kingdom, WA14 2DT**

Notified on  
**3 March 2022**

Governing law <b>Companies Act</b>	Legal form <b>Private Limited Company</b>
Place registered <b>Companies House</b>	Registration number <b>01757889</b>

Incorporated in  
**United Kingdom**

Nature of control  
**Ownership of shares - 75% or more**  
**Ownership of voting rights - 75% or more**  
**Right to appoint or remove directors**

See <https://find-and-update.company-information.service.gov.uk/company/13637641/persons-with-significant-control> (last visited November 13, 2025).

26. Upon information and belief, Defendants offer their products and services, including the products accused of infringement in this Complaint, to customers and potential customers located in the Eastern District of Texas.

### **NATURE OF THE ACTION, JURISDICTION, AND VENUE**

27. Oura brings this action for patent infringement under the patent laws of the United States, 35 U.S.C. § 271 *et seq.*

28. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the action arises under the patent laws of the United States.

29. This Court has personal jurisdiction over Defendants in this action pursuant to the Due Process Clause of the United States Constitution and/or the Texas Long Arm Statute, by virtue of at least the substantial business each Defendant conducts in this forum, directly and/or through intermediaries, including but not limited to: (1) having committed acts within the Eastern District of Texas giving rise to this action and having established minimum contacts with this forum such that the exercise of jurisdiction over each Defendant would not offend traditional notions of fair play and substantial justice; (2) having directed its activities to customers in the State of Texas and this District, solicited business in the State of Texas and this District, transacted business within the State of Texas and this District and attempted to derive financial benefit from residents of the State of Texas and this District, including benefits directly related to the instant patent infringement causes of action set forth herein; (3) having placed their products and services into the stream of commerce throughout the United States and having been actively engaged in transacting business in Texas and in this District; and (4) either individually, as members of a common business enterprise, and/or in conjunction with third parties, having committed acts of infringement within Texas and in this District.

30. For example, on information and belief, Defendants market, sell, and ship the accused products through the website <https://www.reeboksmartring.com/> (last visited November 13, 2025), where they “currently ship to the following regions: United States.” *See* <https://www.reeboksmartring.com/pages/shipping-policy> (last visited November 13, 2025).

31. On information and belief, Defendants have also derived substantial revenues from infringing acts in the Eastern District of Texas, including from the sale and use of infringing products (including the Accused Products, to be defined below).

32. Venue is proper against Defendants in this District pursuant to 28 U.S.C. § 1391 because Defendants are not resident in the United States, and thus may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3). Defendants through their own acts and/or through the acts of their subsidiaries or agents, makes, uses, sells, and/or offers to sell infringing products within this Judicial District, regularly does and solicits business in this Judicial District, and has the requisite minimum contacts with the Judicial District such that this venue is a fair and reasonable one.

33. Defendants are properly joined under 35 U.S.C. § 299(a)(1) because Defendants, through their own acts and/or through the acts of other entities acting as their agent, representative, or alter ego, commonly and/or jointly design and/or sell accused products such that at least one right to relief is asserted against Defendants jointly, severally, and in the alternative with respect to the same transactions, occurrences, or series of transactions or occurrences relating to the making, using, selling, and/or offering to sell in, and/or importing into the United States the same accused products.

34. Defendants are properly joined under 35 U.S.C. § 299(a)(2) because Defendants, through their own acts and/or through the acts of other entities acting as their agent, representative, or alter ego, make, use, sell, and/or offer to sell in, and/or import into the United States the same or similar accused products, such that questions of fact will arise that are common to all Defendants.

35. Upon information and belief, Reebok, TOFF, and Truconnect Ltd., acting in consort, have placed the accused products in the stream of commerce, knowing the likely destination of the products in the United States and this District.

36. Upon information and belief, each Defendant serves as agent, representative, and/or alter ego of each other Defendant for the purpose of conducting business in the United States and this District in relation to making, using, selling, offering to sell, and importing into the United States the accused products.

37. Upon information and belief each Defendant exercises direction and control over the performance of each other Defendant, or the Defendants form a joint enterprise such that the performance by one Defendant is attributable to the other Defendant.

**COUNT 1 – INFRINGEMENT OF U.S. PATENT NO. 11,868,178**

38. Oura incorporates paragraphs 1-37 above by reference.

39. U.S. Patent No. 11,868,178 (attached hereto at Exhibit 1) duly issued on January 9, 2024, and is entitled *Wearable Computing Device*.

40. Ouraring Inc. is the owner by assignment of the '178 Patent and possesses all rights under the '178 Patent, including the exclusive right to recover for past and future infringement.

41. The '178 Patent is directed to a finger-worn wearable ring device. In particular, the apparatus disclosed in the '178 Patent ensures the inclusion of a battery, printed circuit board, and one or more sensors between an internal and external housing of a wearable ring device. Further, the apparatus disclosed in the '178 Patent provides “a wearable computing device [that] can be worn for extended periods of time and can take many measurements and perform various functions because of its form factor and position on the finger of a user.” '178 Patent, 1:52-55.

42. Specifically, the '178 Patent discloses an exemplary finger-worn wearable ring device including “an external housing component,” “an internal housing component,” “a battery,” “a printed circuit board,” and “one or more sensors,” that all work in conjunction to provide a wearable ring device. *See* '178 Patent, Cl. 1. Further, the battery is positioned within a cavity formed between the internal housing component and the external housing component with a shape and size configured to fit within a first portion of a cavity between circumferential surfaces. *See id.* The printed circuit board is also disposed between the internal and external housing components and extends through at least a second portion of the cavity. *See id.* The one or more sensors are electrically coupled to the printed circuit board and the battery and are configured to acquire data from the user through the internal housing component. *See id.*

43. Figure 4 of the '178 Patent excerpted below is one example of the finger-worn wearable ring:

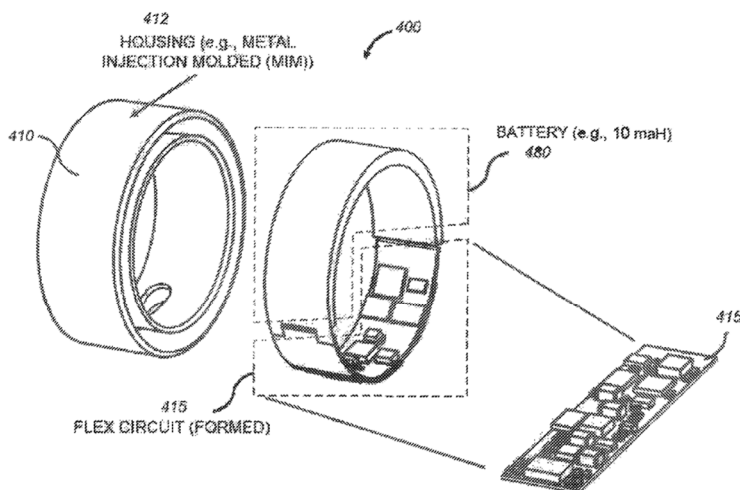


FIG. 4

44. Defendants have directly infringed one or more claims of the '178 Patent in this District and elsewhere in Texas, including at least claim 1, literally and/or under the doctrine of

equivalents, by or through making, using, importing, offering for sale and/or selling their smart ring technology, including at least Reebok-branded products having materially similar configurations to a wearable smart ring device.

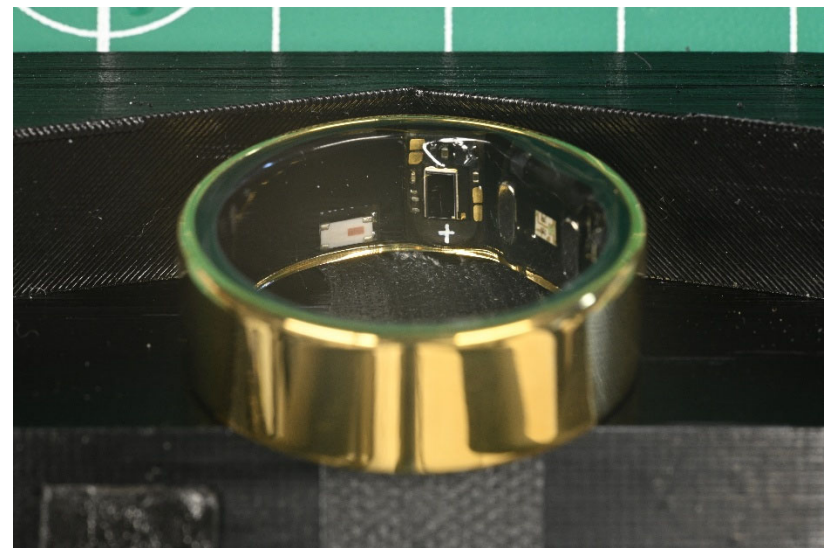
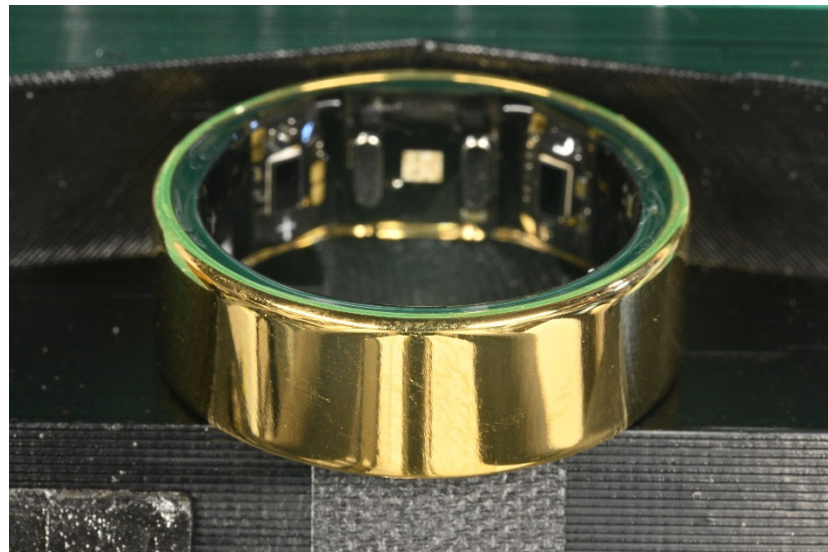
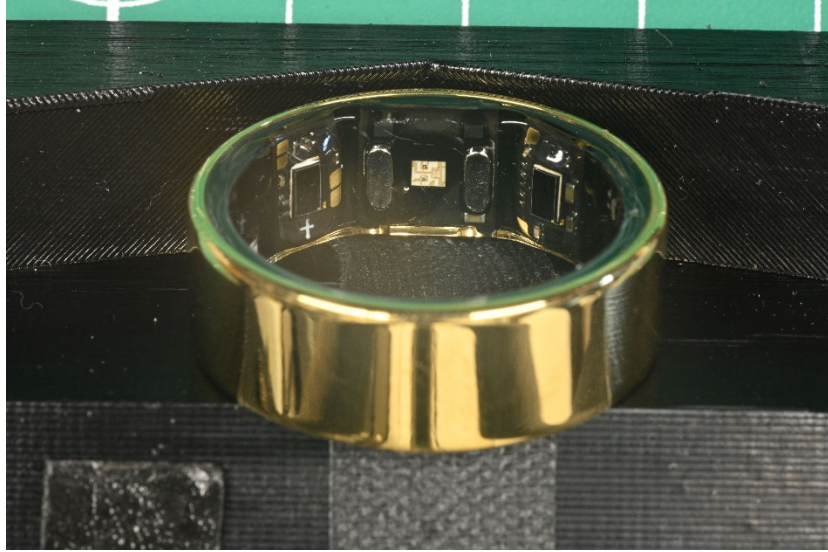
45. For example, Defendants have literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the '178 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling at least the following: Reebok Smart Ring and its corresponding mobile application, including the Reebok Fitness App (collectively, the "Accused Product"). *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Oura reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the Accused Product is identified to describe Defendants' infringement and in no way limit the discovery and infringement allegations against Defendants concerning other devices that incorporate the same or reasonably similar functionalities.

46. The Accused Product is observed to be a finger-worn wearable ring device. For example, the Accused Product is observed to be a smart ring intended to be worn on a user's finger. The Accused Product is observed to include an external housing component defining an outer circumferential surface and an internal housing component defining an inner circumferential surface of the finger-worn wearable ring device which is coupled with the external housing component. For example, the Accused Product includes a titanium housing. The Accused Product is further observed to include a battery and a printed circuit board within a cavity formed between the internal housing component and external housing component and one or more sensors electrically coupled with the printed circuit board and the battery to acquire data from the user. For example, the Accused Product includes an accelerometer, heart rate sensor (PPG –

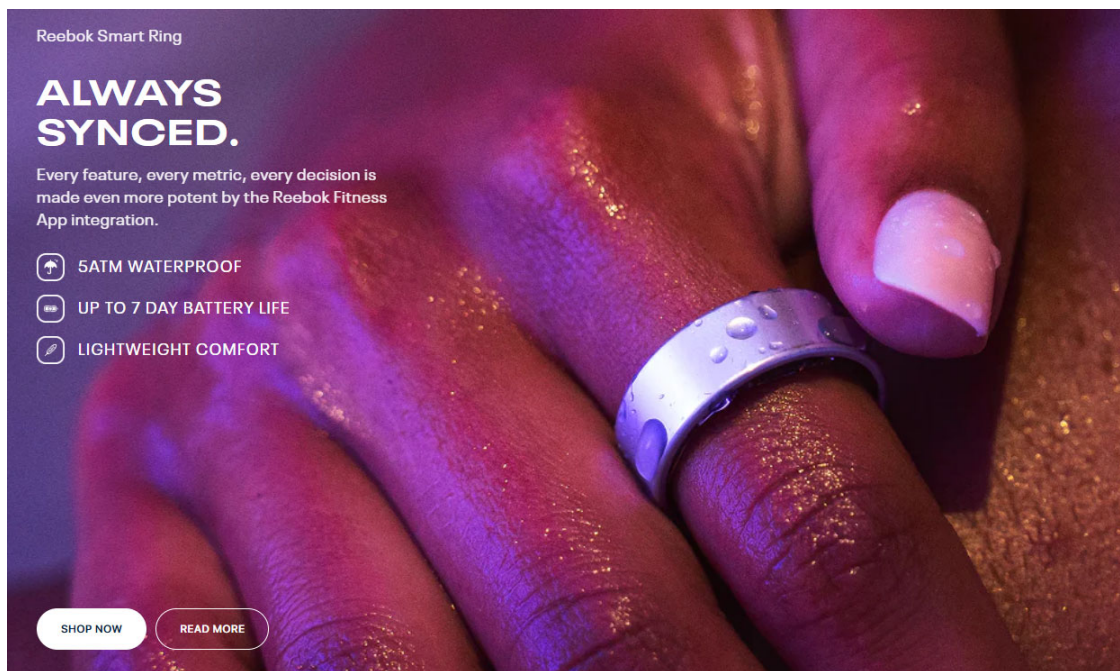
photoplethysmography), SpO<sub>2</sub> Sensor (pulse oximeter), and skin temperature sensor to acquire data from the user. See <https://www.reeboksmartring.com/>; <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

47. As shown below, images of an exemplary Accused Product, including the Reebok Smart Ring, provide non-limiting examples of the Accused Product infringing at least claim 1 of the '178 Patent by including “an external housing component,” “an internal housing component,” “a battery,” “a printed circuit board,” and “one or more sensors,” as claimed in the '178 Patent:





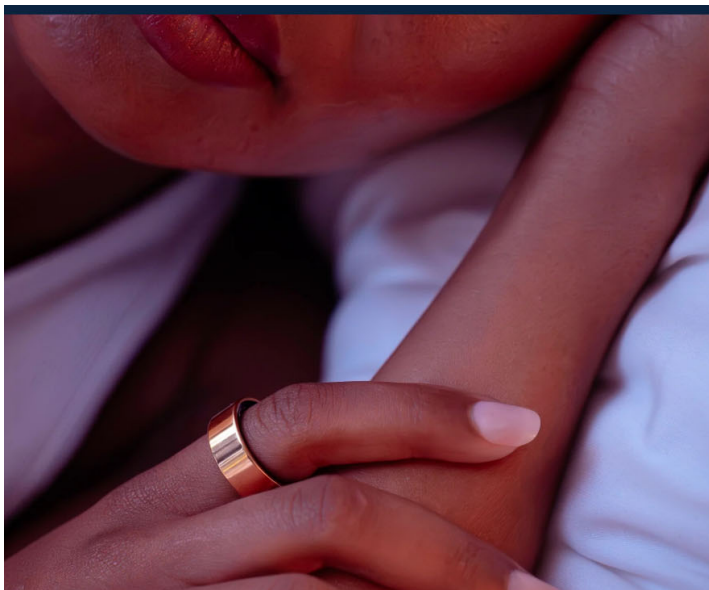
48. Similarly, the following excerpts from Defendants' websites provide non-limiting examples of the Accused Product infringing at least claim 1 of the '178 Patent:



## MOVEMENT IN MOTION

- ACTIVITY TRACKING**  
From walks to workouts, track your steps, distance, and calories throughout the day.
- EXERCISE MODE**  
Whether lifting, stretching, cycling, or sprinting; the ring adapts and syncs with the app to reflect your effort.
- ONE SCORE**  
Your daily green light, or your signal to slow down. This all-in-one score helps you understand when to push.





## BUILT FOR RECOVERY

### SLEEP TRACKING

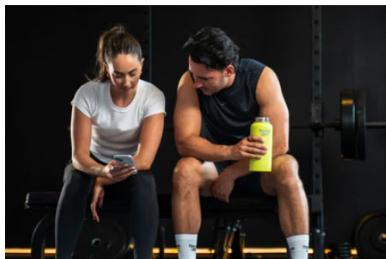
Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed picture of how you're actually resting. Wake up to sleep scores and data-driven guidance for more informed training and smoother recovery.

### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts in your overnight baseline temperature that may point to early illness, hormonal changes, or signs of overtraining.

### STRESS MONITORING

With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising stress levels. It doesn't just tell you when you're stressed, it guides you toward strategies that help.



### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



### SPO2 (BLOOD OXYGEN)







Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.

<https://www.reeboksmartring.com/> (last visited November 13, 2025).





WHAT THE RING TRACKS ^

 Heart Rate	 HRV	 SPO2
 Steps	 Sleep Duration & Sleep Stages	 Stress

REEBOK FITNESS MEMBERSHIP ^

Every purchase of a Reebok Smart Ring comes with a 1 year free membership to over 1,000+ hours of fitness & wellness content in the Reebok Fitness App

## DESIGNED FOR LIFE.

### SLEEK, COMFORTABLE DESIGN

Crafted for durability and wearability, the ring is lightweight yet sturdy - designed to be worn during workouts, sleep, or daily movement.

### SIMPLE CHARGING + LONG BATTERY

A compact charging dock makes top-ups easy; most users can go several days between charges with normal use.

### INTEGRATED APP EXPERIENCE

All data feeds into the Reebok Fitness App, where you can view trends, set goals, join challenges, and access guided wellness content

## ACTIONABLE INSIGHTS.

### ALL-DAY BIOMETRIC TRACKING

Monitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.

### EFFORTLESS CONNECTIVITY & SYNC

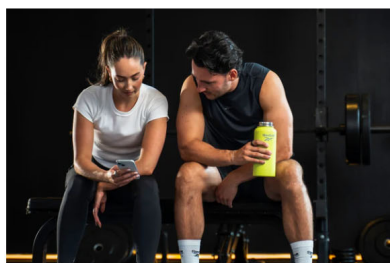
Bluetooth connection to the Reebok Fitness App ensures seamless data transfer.

### REAL-TIME PERFORMANCE & SLEEP INSIGHTS

Never accept a bad night's sleep again - with the Reebok Smart Ring, every minute is accounted for so you'll be informed about how you're sleeping.



The future of wellness



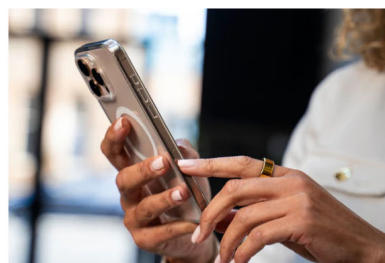
#### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



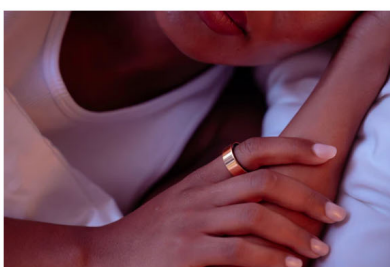
#### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



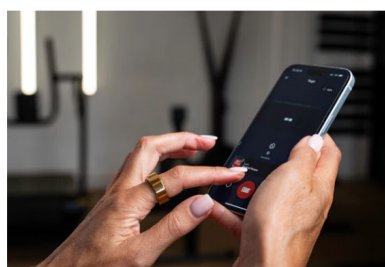
#### SPO2 (BLOOD OXYGEN)

Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.



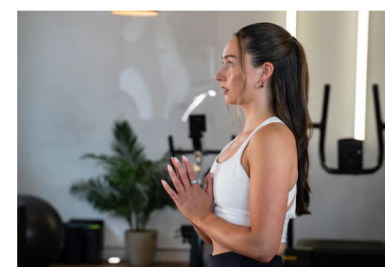
#### SLEEP TRACKING

Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed.



#### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts.



#### STRESS MONITORING

With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising.

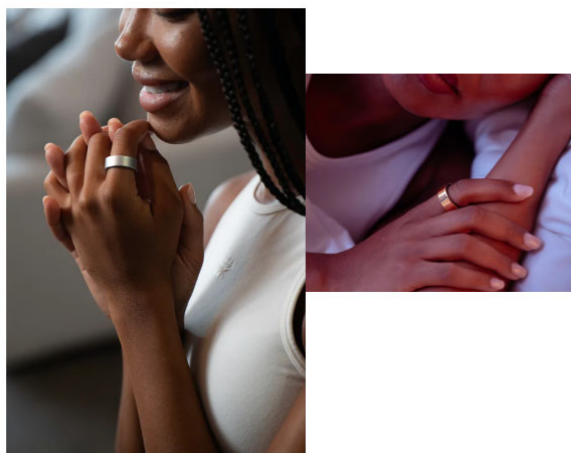
<https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025).

## HOW TO WEAR IT

To get the most accurate results from your Reebok Smart Ring:

1. Wear it on your index finger, preferably your non-dominant hand.
2. Ensure the sensor is facing your palm side.

*Top tip: stay still for a few moments during manual readings, like heart rate or SpO2.*



<https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025).

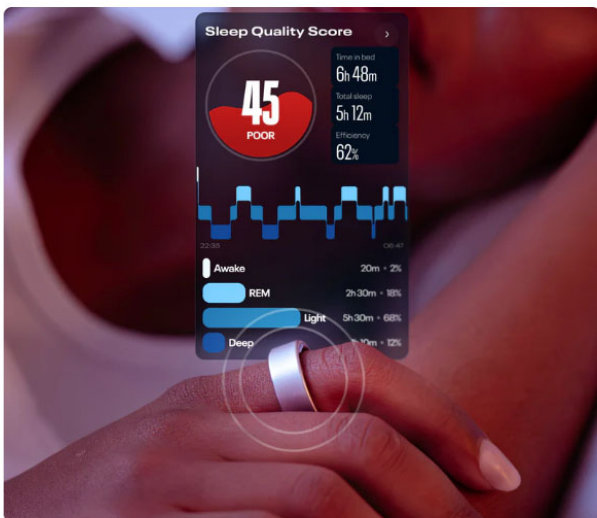


## UNDERSTANDING YOUR ONE SCORE

We've designed the score to stay simple and easy to understand. You don't need to dig into complicated data, just one clear number that shows how you're doing today. When one of these areas is out of balance, like missing your activity target, a restless night's sleep, or higher stress, your score may dip. That's not failure, it's a signpost, guiding you toward where to focus to feel better.



## HOW IT'S CALCULATED



### SLEEP QUALITY SCORE

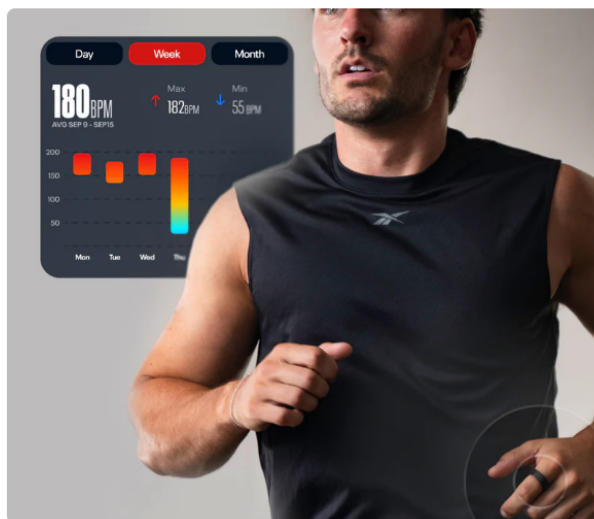
#### EVERY MINUTE TRACKED

The most important part of your day can happen before you wake up. How you sleep, and the stages of sleep you enjoy, are a core contributor to how your One Score is calculated.

### ACTIVITY SCORE

#### THE DATA IN EVERY MOVEMENT

Whether you're stretching, walking, running or all of the above, every time you move you contribute to your health & fitness. All activity is captured by the Reebok Smart Ring and integrated in to your One Score so you have a clear picture of just how hard you're pushing it.





## STRESS & RECOVERY

### BODY & MIND

Leveraging a variety of data points including HRV, the One Score builds in a cross section of health & wellness variables to provide an informed insight in to how well your body is recovering from stress - whether that be physical, mental or both.



### GOOD

you're doing really well across most areas. Anywhere north of 86 and you're in your sweet spot of recovery and activity

### NORMAL

you're making progress, but there's room to improve. It's worth digging in to your metrics to find out where you can make positive changes to your day or night

### POOR

one or more areas are off balance. Start small and focus on one thing today that can compound in to change over time

<https://www.reeboksmartring.com/pages/one-score> (last visited November 13, 2025).

## What sensors does the Reebok Smart Ring use?

### Accelerometer

- Function: Detects movement and orientation.
- Purpose: Activity tracking, step count, sleep movement detection.
- Example Use: Tracking daily activity levels and differentiating sleep stages.

### Heart Rate Sensor (PPG - Photoplethysmography)

- Function: To measure blood flow.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### SpO<sub>2</sub> Sensor (Pulse Oximeter)

- Function: Measures oxygen saturation in the blood.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### Skin Temperature Sensor

- Function: Detects changes in finger skin temperature.
- Purpose: Stress and recovery.

<https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

49. The foregoing features of the Accused Product and Defendants' description and/or demonstration thereof, including in user manuals and advertising, reflect Defendants' direct infringement by satisfying every element of at least claim 1 of the '178 Patent, under 35 U.S.C. § 271(a).

50. Defendants have indirectly infringed at least claim 1 of the '178 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of the Accused Product. Defendants' customers who

purchase devices and components thereof and operate such devices and components in accordance with Defendants' instructions directly infringe one or more claims of the '178 Patent in violation of 35 U.S.C. § 271. Defendants instruct their customers through at least user guides or websites, such as those located at: <https://www.reeboksmartring.com/>; <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/categories/29055239372317-Reebok-Smart-Ring> (last visited November 13, 2025).

51. For example, Defendants' websites explains that users can “[m]onitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.” See <https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025). Defendants instruct their customers that “to get the most accurate results from your Reebok Smart Ring: 1. Wear it on your index finger, preferably your non-dominant hand. 2. Ensure the sensor is facing your palm side.” See <https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025). Further, Defendants state that “[b]uilt to integrate directly with the Ring, the Reebok Fitness App doesn't just house your data - it offers a library of fitness & wellness content for you to take action.” See <https://www.reeboksmartring.com/> (last visited November 13, 2025). Defendants also highlight the “activity tracking,” “exercise mode,” “one score,” “sleep tracking,” “skin temperature trend,” and “stress monitoring” features of the Reebok Smart Ring. See *id.*

52. Defendants are thereby liable for infringement of the '178 Patent pursuant to 35 U.S.C. § 271(b).

53. Defendants have indirectly infringed at least claim 1 of the '178 Patent, by, among other things, contributing to the direct infringement of others, including customers of the Accused Product by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the '178 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

54. For example, the Accused Product includes hardware and software for implementing health tracking functionality in a smart ring wearable, including a battery, housings, sensors, and a printed circuit board. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Defendants are liable for infringement of the '178 Patent pursuant to 35 U.S.C. § 271(c).

55. Defendants have been on notice of the '178 Patent since, at least, the filing of this Complaint. By the time of trial, Defendants will thus have known and intended that their continued actions would directly infringe and/or actively induce or contribute to actual infringement of at least claim 1 of the '178 Patent.

56. Defendants undertook and continued their infringing actions despite an objectively high likelihood that such activities infringed the '178 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this Complaint, Defendants have been aware of an objectively high likelihood that their actions constituted and continue to constitute infringement of the '178 Patent, and that the '178 Patent is valid. On information and

belief, Defendants could not reasonably, subjectively believe that their actions do not constitute infringement of the '178 Patent, nor could they reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants continued their infringing activities. As such, Defendants have willfully infringed and continues to willfully infringe the '178 Patent.

57. Oura has been and continues to be damaged by Defendants' infringement of the '178 Patent.

**COUNT 2 - INFRINGEMENT OF U.S. PATENT NO. 12,353,244**

58. Oura incorporates paragraphs 1-57 above by reference.

59. U.S. Patent No. 12,353,244 (the "244 Patent," attached hereto at Exhibit 2) duly issued on July 8, 2025, and is entitled *Wearable Computing Device*.

60. Ouraring Inc. is the owner by assignment of the '244 Patent and possesses all rights under the '244 Patent, including the exclusive right to recover for past and future infringement.

61. The '244 Patent is directed to a wearable ring device including, for example, a wearable ring device configured to be worn on a finger of a user. In particular, the apparatus disclosed in the '244 Patent ensures that a user can track their physical movement, skin temperature, heart rate, and blood oxygenation levels from sensing data obtained from the wearable ring device.

62. Specifically, the '244 Patent discloses a wearable ring device including "an external housing," "an internal potting," "a curved battery," "a printed circuit board," "accelerometer," "temperature sensor," a "first light emitting diode (LED)," "a second LED," and "one or more light sensors" that all work in conjunction to provide a wearable smart ring device. *See* '244 Patent, Cl. 1. Further, the housing has an interior diameter between 12 mm and 24 mm, an exterior

diameter between 18 mm and 30 mm, a width between 3 mm and 8 mm, and a thickness between 1.5 mm and 3 mm. *See id.* The sensors, including the accelerometer, temperature sensors, LEDs, and one or more light sensors, are electrically coupled to the printed circuit board and the battery and are configured to acquire data, such as the heart rate and blood oxygenation level, from the user. *See id.* An exemplary configuration is shown below in the excerpted Figures 3B, 8, 12A, 12B, 12C, 13, and 15B of the '244 Patent.

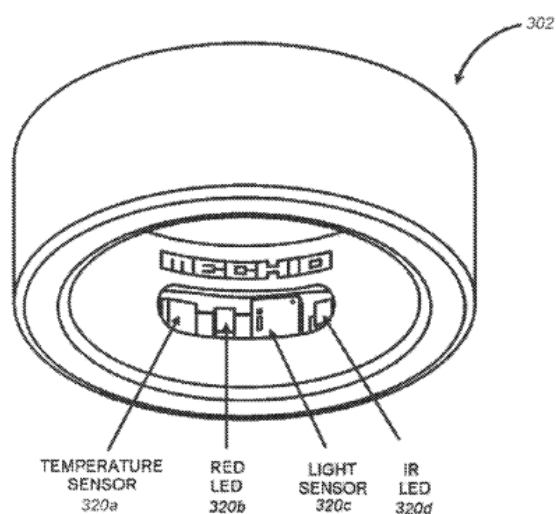
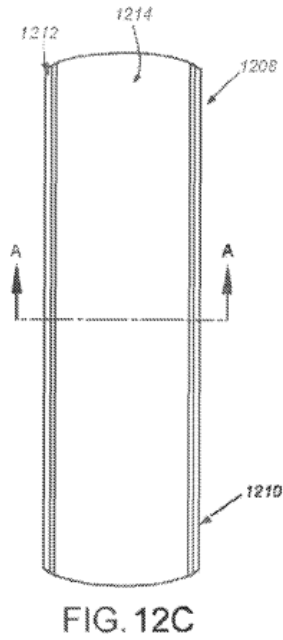
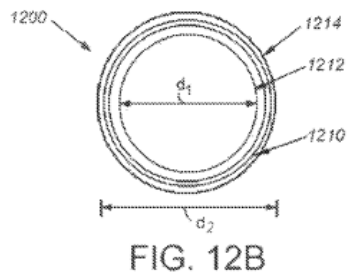
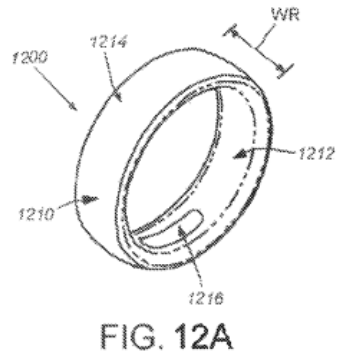
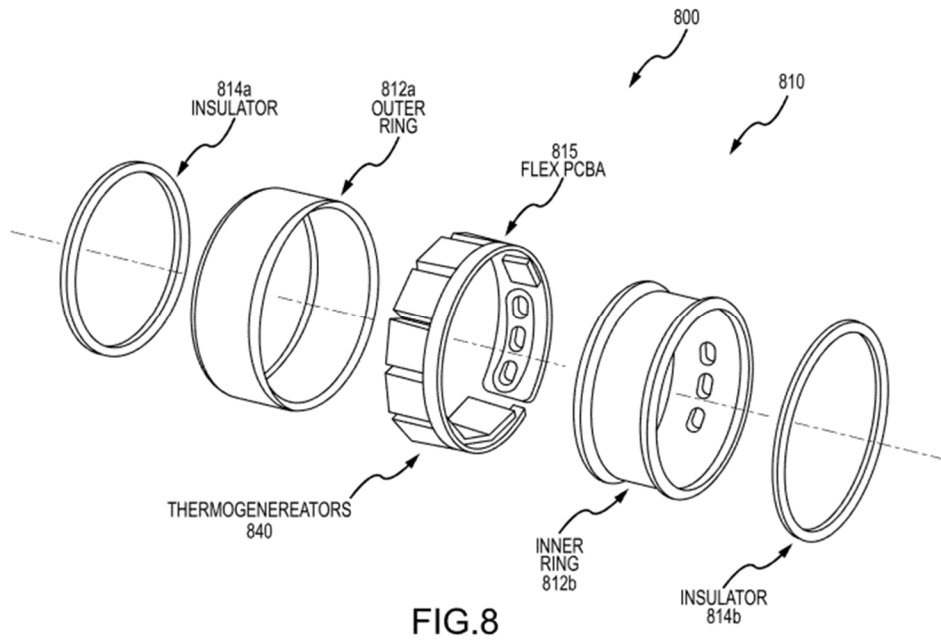


FIG. 3B



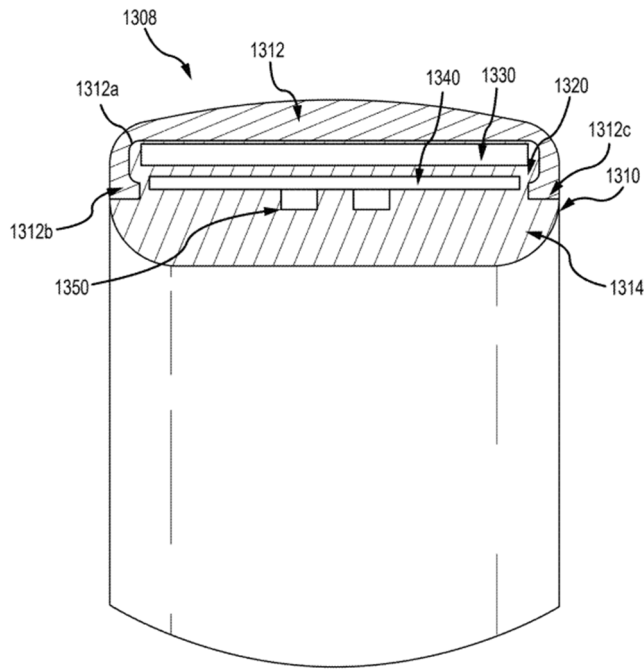


FIG. 13

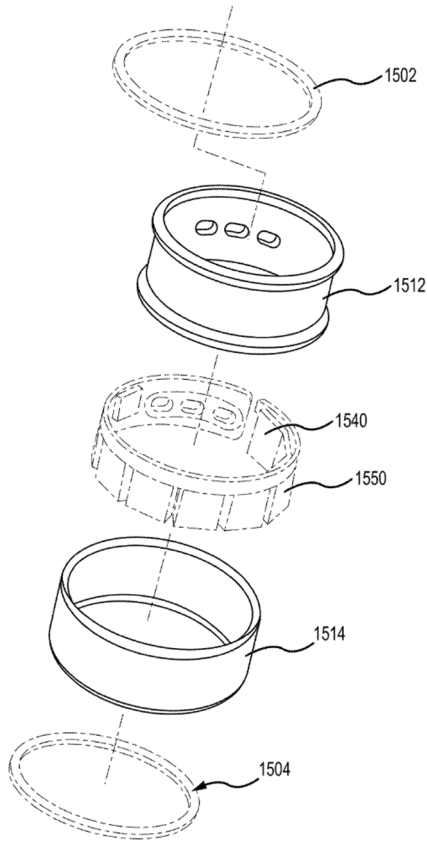


FIG. 15B

63. Defendants have directly infringed one or more claims of the '244 Patent in this District and elsewhere in Texas, including at least claim 1, literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling their smart ring technology, including at least Reebok-branded products having materially similar configurations to a wearable ring device.

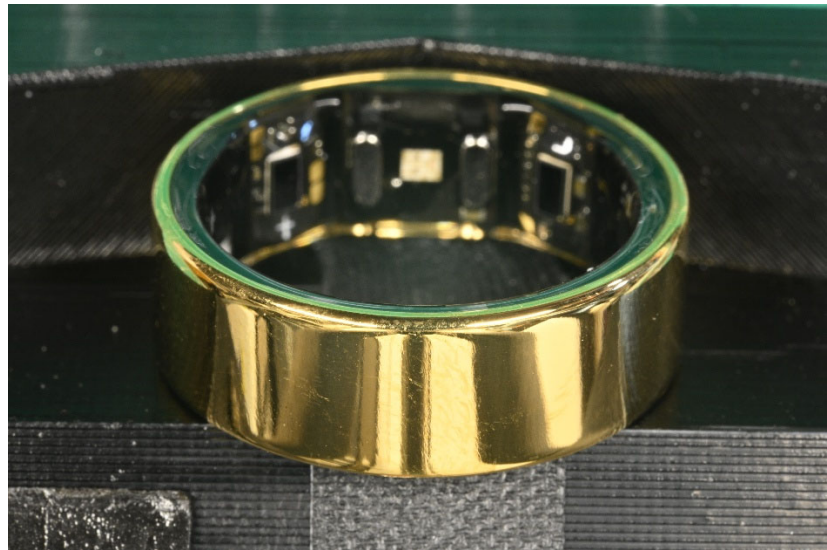
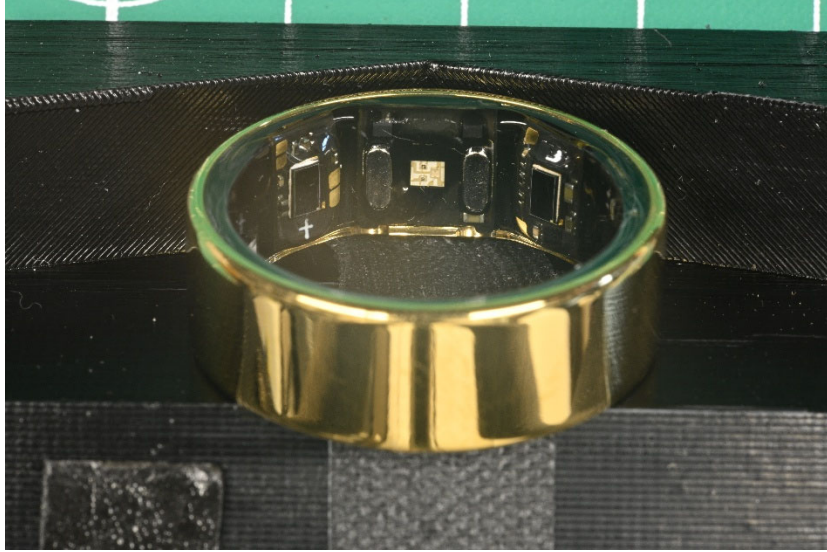
64. For example, Defendants have literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the '244 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling the Accused Product. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Oura reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the Accused Product is identified to describe Defendants' infringement and in no way limit the discovery and infringement allegations against Defendants concerning other devices that incorporate the same or reasonably similar functionalities.

65. The Accused Product is observed to be a wearable ring device configured to be worn on a finger of a user. For example, the Accused Product is observed to be a smart ring wearable device. The Accused Product is observed to include a housing including an external housing and an internal potting at least partially surrounding a curved battery, a printed circuit board, and one or more components. For example, the Accused Product includes a titanium housing with an internal potting at least partially surrounding a curved battery, printed circuit board, and one or more components. The Accused Product is further observed to include a curved battery within the housing electrically coupled to the printed circuit board and one or more components. Additionally, the Accused Product is observed to include one or more components, including an accelerometer, a temperature sensor, a first light emitting diode (LED), a second LED,

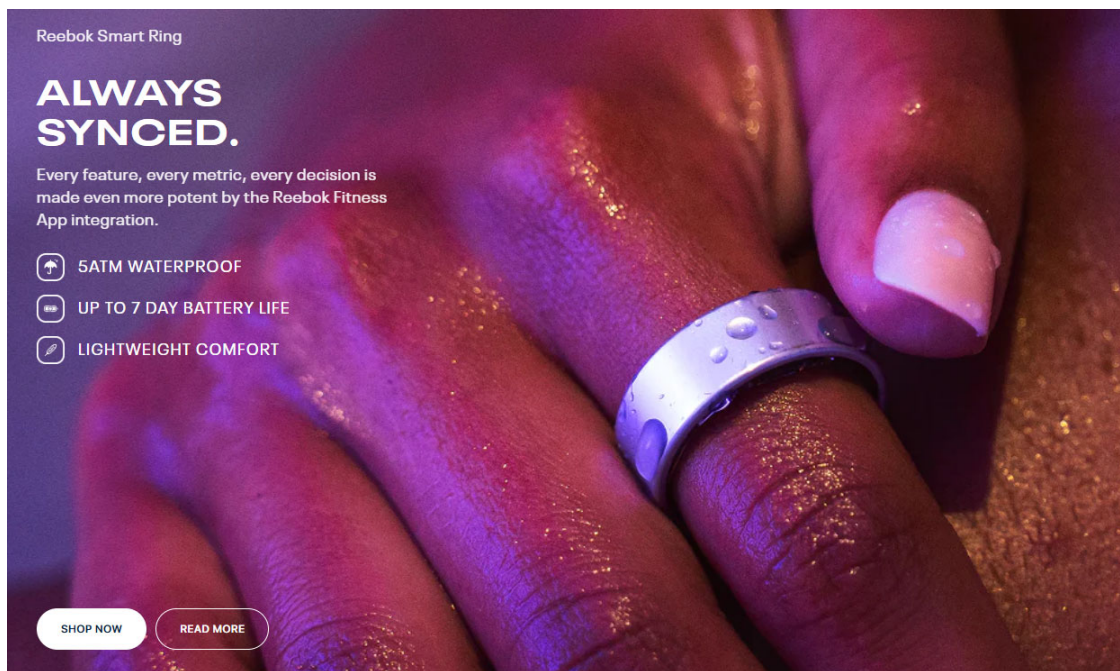
and one or more light sensors to measure the heart rate and blood oxygenation level of the user. For example, the Accused Product includes an accelerometer, heart rate sensor (PPG – photoplethysmography), SpO<sub>2</sub> Sensor (pulse oximeter), and skin temperature sensor to acquire data from the user, such as the user’s blood oxygenation level, heart rate, temperature, and activity level. See <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

66. As shown below, images of an exemplary Accused Product, including the Reebok Smart Ring, provide non-limiting examples of the Accused Product infringing at least claim 1 of the ’244 Patent by including “an external housing,” “an internal plotting,” “a curved battery,” “a printed circuit board,” “accelerometer,” “temperature sensor,” a “first light emitting diode (LED),” “a second LED,” and “one or more light sensors” as claimed in the ’244 Patent:



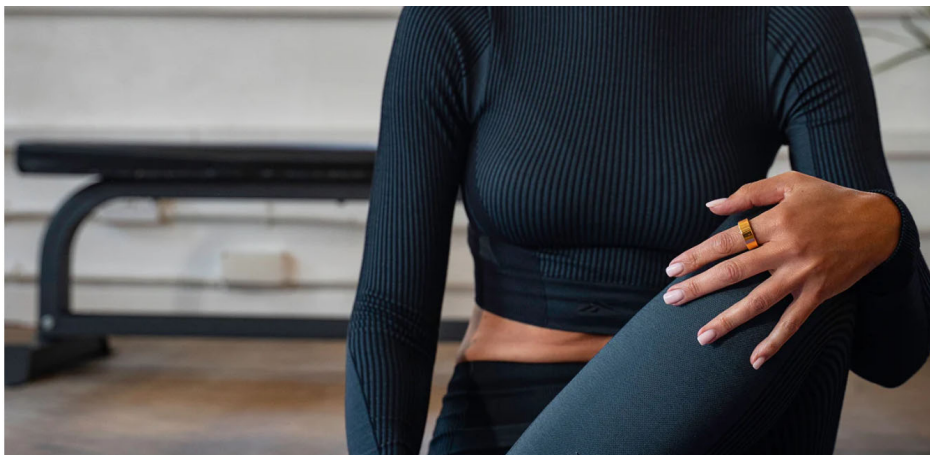


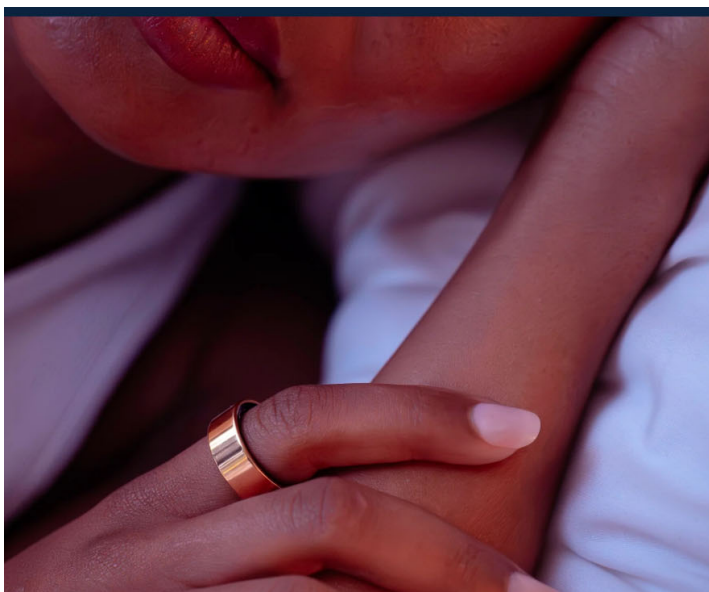
67. Similarly, the following excerpts from Defendants' websites provide non-limiting examples of the Accused Product infringing at least claim 1 of the '244 Patent:






## MOVEMENT IN MOTION

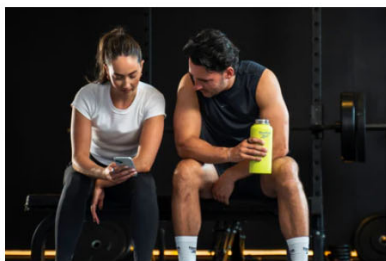
- ACTIVITY TRACKING**  
From walks to workouts, track your steps, distance, and calories throughout the day.
- EXERCISE MODE**  
Whether lifting, stretching, cycling, or sprinting; the ring adapts and syncs with the app to reflect your effort.
- ONE SCORE**  
Your daily green light, or your signal to slow down. This all-in-one score helps you understand when to push.





## BUILT FOR RECOVERY

-  **SLEEP TRACKING**  
 Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed picture of how you're actually resting. Wake up to sleep scores and data-driven guidance for more informed training and smoother recovery.
-  **SKIN TEMPERATURE TREND**  
 Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts in your overnight baseline temperature that may point to early illness, hormonal changes, or signs of overtraining.
-  **STRESS MONITORING**  
 With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising stress levels. It doesn't just tell you when you're stressed, it guides you toward strategies that help.



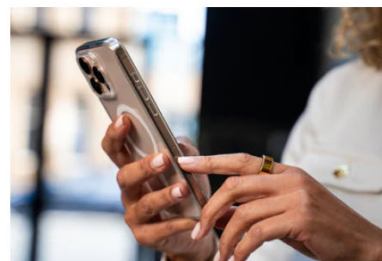
### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



### SPO2 (BLOOD OXYGEN)







Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.

<https://www.reeboksmartring.com/> (last visited November 13, 2025).





WHAT THE RING TRACKS ^

 Heart Rate	 HRV	 SPO2
 Steps	 Sleep Duration & Sleep Stages	 Stress

REEBOK FITNESS MEMBERSHIP ^

Every purchase of a Reebok Smart Ring comes with a 1 year free membership to over 1,000+ hours of fitness & wellness content in the Reebok Fitness App

## DESIGNED FOR LIFE.

### SLEEK, COMFORTABLE DESIGN

Crafted for durability and wearability, the ring is lightweight yet sturdy - designed to be worn during workouts, sleep, or daily movement.

### SIMPLE CHARGING + LONG BATTERY

A compact charging dock makes top-ups easy; most users can go several days between charges with normal use.

### INTEGRATED APP EXPERIENCE

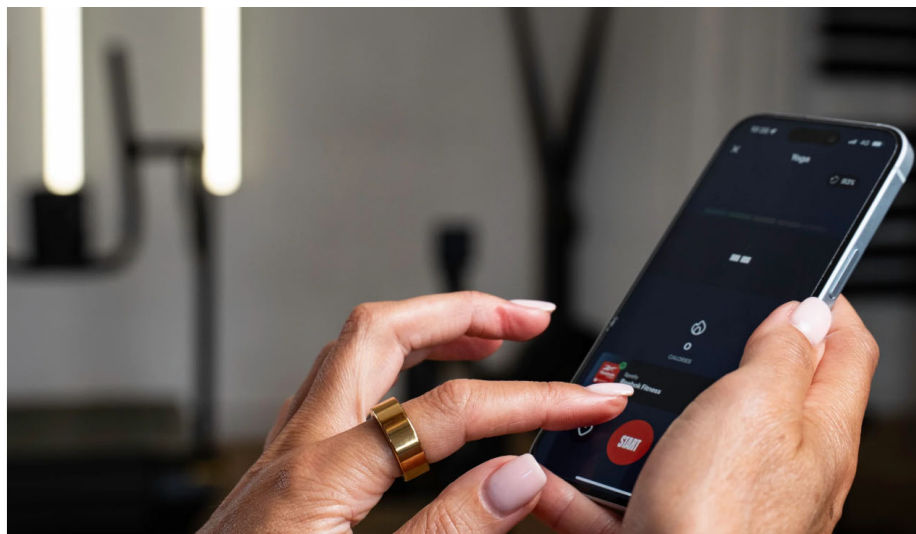
All data feeds into the Reebok Fitness App, where you can view trends, set goals, join challenges, and access guided wellness content

## ACTIONABLE INSIGHTS.

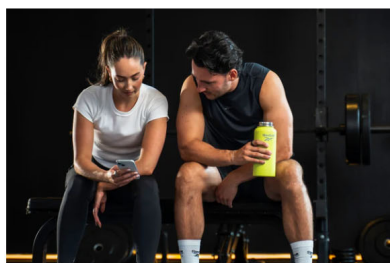
**ALL-DAY BIOMETRIC TRACKING**  
Monitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.

**EFFORTLESS CONNECTIVITY & SYNC**  
Bluetooth connection to the Reebok Fitness App ensures seamless data transfer.

**REAL-TIME PERFORMANCE & SLEEP INSIGHTS**  
Never accept a bad night's sleep again - with the Reebok Smart Ring, every minute is accounted for so you'll be informed about how you're sleeping.



The future of wellness



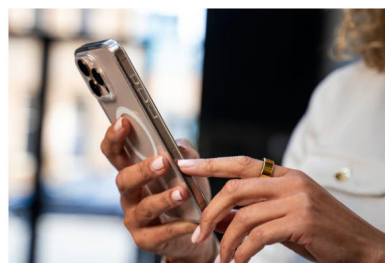
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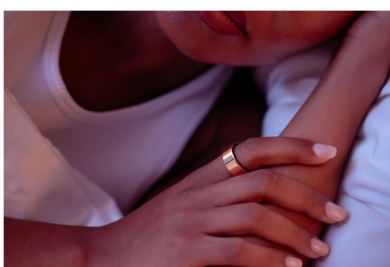
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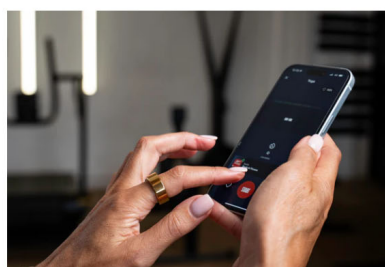
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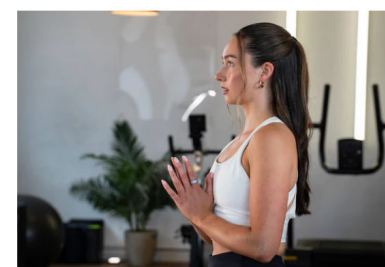
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Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed.



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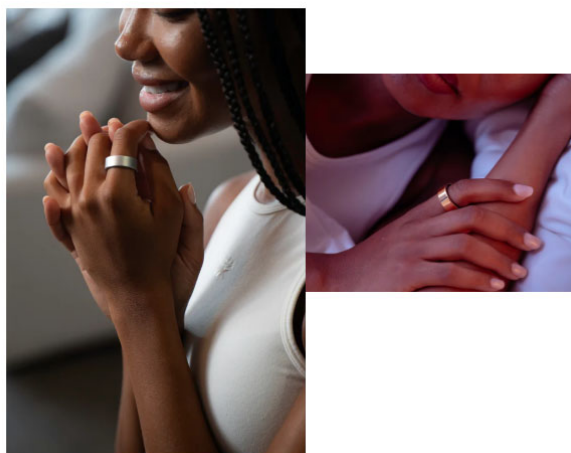
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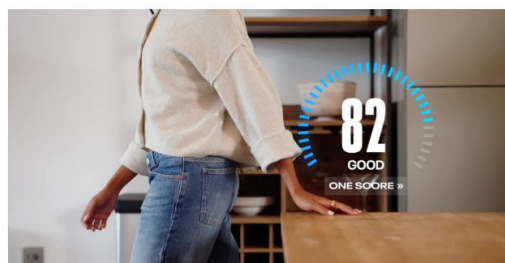


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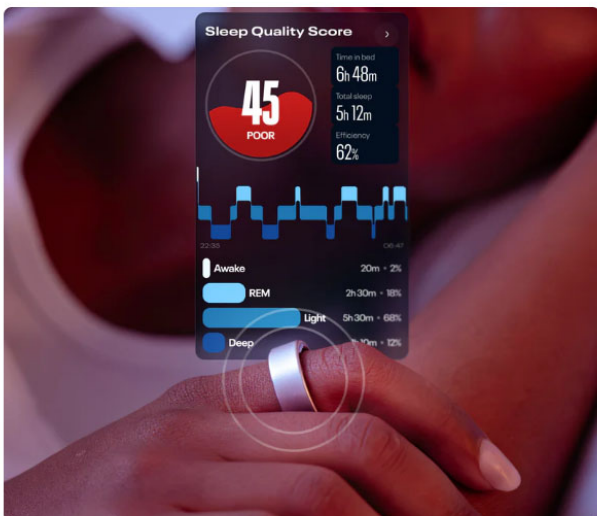


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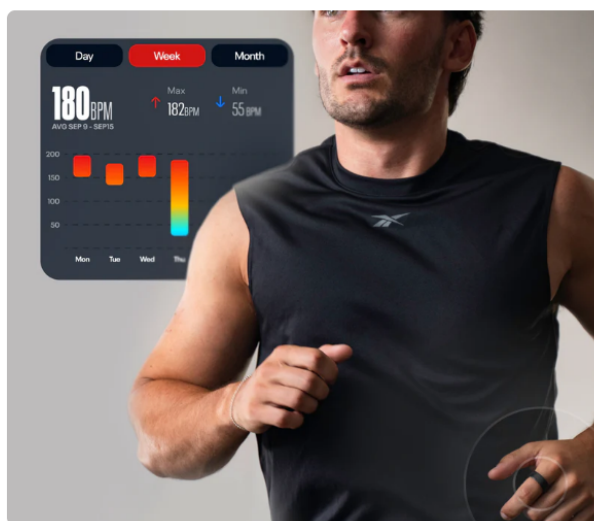
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The most important part of your day can happen before you wake up. How you sleep, and the stages of sleep you enjoy, are a core contributor to how your One Score is calculated.

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#### THE DATA IN EVERY MOVEMENT

Whether you're stretching, walking, running or all of the above, every time you move you contribute to your health & fitness. All activity is captured by the Reebok Smart Ring and integrated in to your One Score so you have a clear picture of just how hard you're pushing it.





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- Function: Measures oxygen saturation in the blood.
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- Function: Detects changes in finger skin temperature.
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69. Defendants' have indirectly infringed at least claim 1 of the '244 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use,

offering for sale, selling, or importation of the Accused Product. Defendants' customers who purchase devices and components thereof and operate such devices and components in accordance with Defendants' instructions directly infringe one or more claims of the '244 Patent in violation of 35 U.S.C. § 271. Defendants instruct their customers through at least user guides or websites, such as those located at: <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/categories/29055239372317-Reebok-Smart-Ring> (last visited November 13, 2025).

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71. Defendants are thereby liable for infringement of the '244 Patent pursuant to 35 U.S.C. § 271(b).

72. Defendants have indirectly infringed at least claim 1 of the '244 Patent, by, among other things, contributing to the direct infringement of others, including customers of the Accused Product by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the '244 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

73. For example, the Accused Product includes hardware and software for implementing health tracking functionality in a smart ring wearable, including a curved battery, housings, sensors, LEDs, and a printed circuit board. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Defendants are liable for infringement of the '244 Patent pursuant to 35 U.S.C. § 271(c).

74. Defendants have been on notice of the '244 Patent since, at least, the filing of this Complaint. By the time of trial, Defendants will thus have known and intended that their continued actions would directly infringe and/or actively induce or contribute to actual infringement of at least claim 1 of the '244 Patent.

75. Defendants undertook and continued their infringing actions despite an objectively high likelihood that such activities infringed the '244 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this Complaint, Defendants have been aware of an objectively high likelihood that their actions constituted and continue to constitute infringement of the '244 Patent, and that the '244 Patent is valid. On information and

belief, Defendants could not reasonably, subjectively believe that their actions do not constitute infringement of the '244 Patent, nor could they reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants continued their infringing activities. As such, Defendants have willfully infringed and continues to willfully infringe the '244 Patent.

76. Oura has been and continues to be damaged by Defendants' infringement of the '244 Patent.

**COUNT 3 - INFRINGEMENT OF U.S. PATENT NO. 12,346,159**

77. Oura incorporates paragraphs 1-76 above by reference.

78. U.S. Patent No. 12,346,159 (the "'159 Patent," attached hereto as Exhibit 3) duly issued on July 1, 2025, and is entitled *Wearable Computing Device*.

79. Ouraring Inc. is the owner by assignment of the '159 Patent and possesses all rights under the '159 Patent, including the exclusive right to recover for past and future infringement.

80. The '159 Patent is directed to a wearable ring device including, for example, a wearable ring device configured to be worn on a finger of a user. In particular, the apparatus disclosed in the '159 Patent ensure that a user can track their physical movement, skin temperature, and blood oxygenation levels from sensing data obtained from the wearable ring device.

81. Specifically, the '159 Patent discloses a wearable ring device including "an external housing," "an internal housing," "a curved battery," "a printed circuit board," "accelerometer," "temperature sensor," a "first light emitting diode (LED)," "a second LED," and "one or more light sensors" that all work in conjunction to provide a wearable smart ring device. *See* '159 Patent, Cl. 1. Further, the housing has an interior diameter between 12 mm and 24 mm, an exterior diameter between 18 mm and 30 mm, a width between 3 mm and 8 mm, and a thickness between

1.5 mm and 3 mm. The sensors, including the accelerometer, temperature sensors, LEDs, and one or more light sensors, are electrically coupled to the printed circuit board and the battery and are configured to acquire data, such as the temperature and blood oxygenation level, from the user. An exemplary configuration is shown below in the excerpted Figures 3B, 8, 12A, 12B, 12C, 13, and 15B of the '159 Patent.

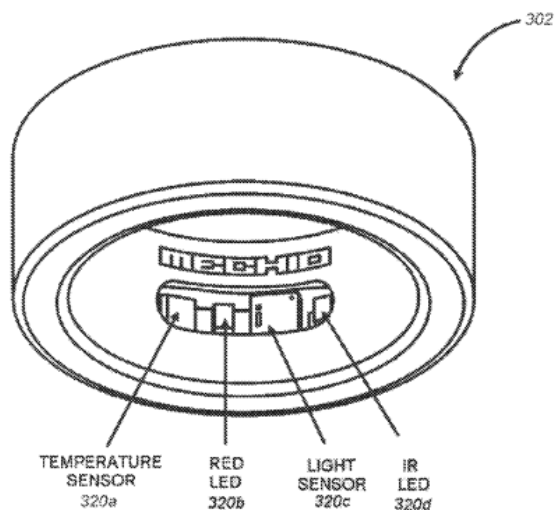


FIG. 3B

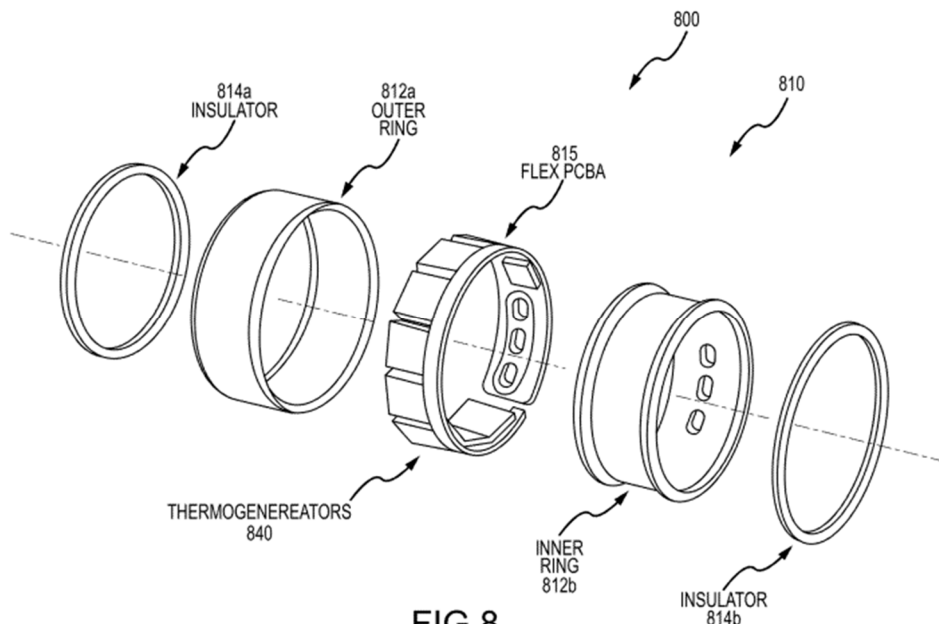


FIG. 8

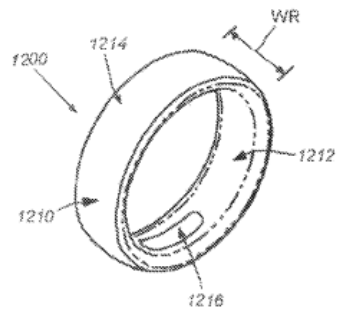


FIG. 12A

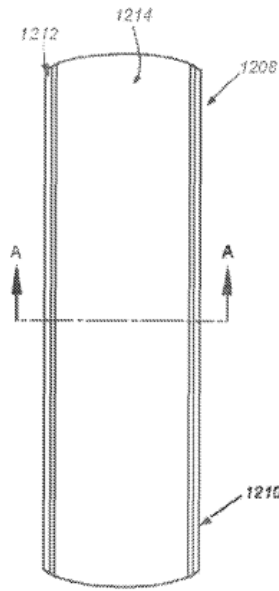


FIG. 12C

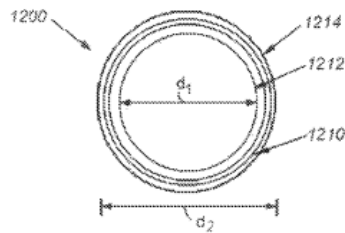


FIG. 12B

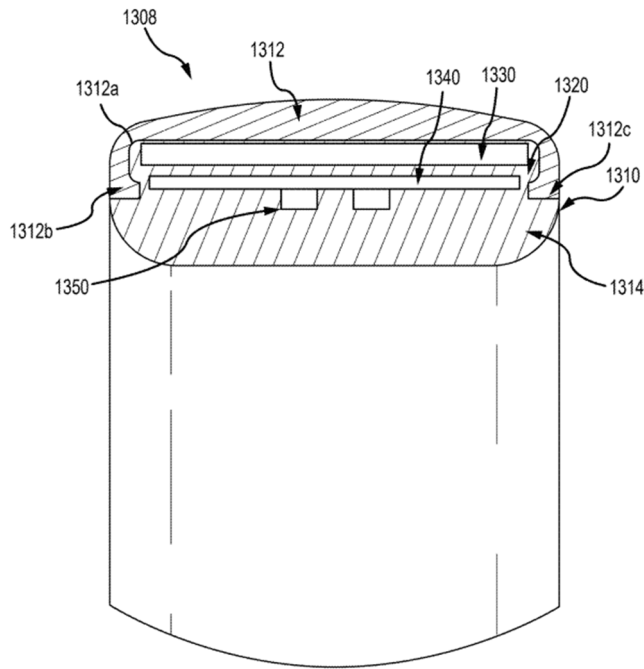


FIG. 13

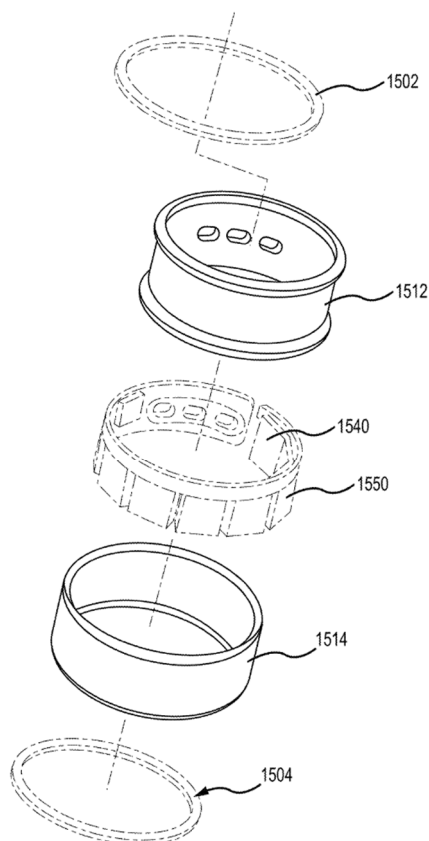


FIG.15B

82. Defendants have directly infringed one or more claims of the '159 Patent in this District and elsewhere in Texas, including at least claim 1, literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling their smart ring technology, including at least Reebok-branded products having materially similar configurations to a wearable ring device.

83. For example, Defendants have literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the '159 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling the Accused Product. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Oura reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the Accused Product is identified to describe Defendants' infringement

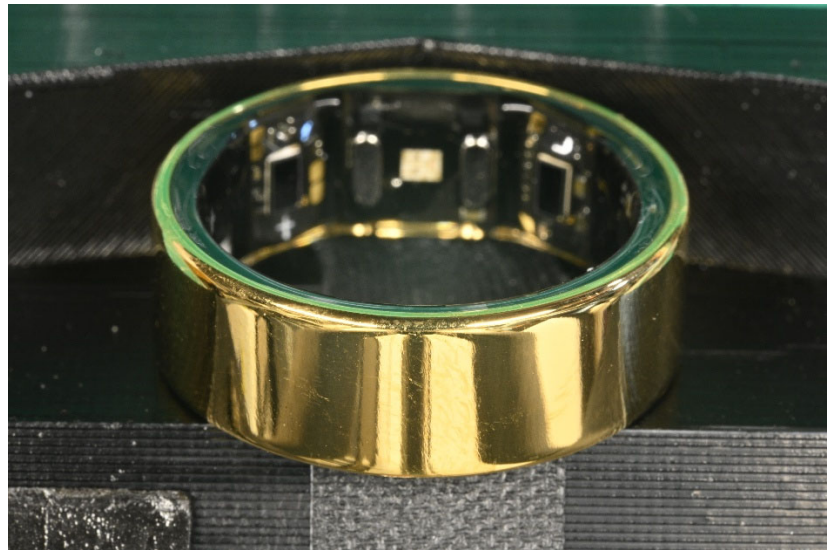
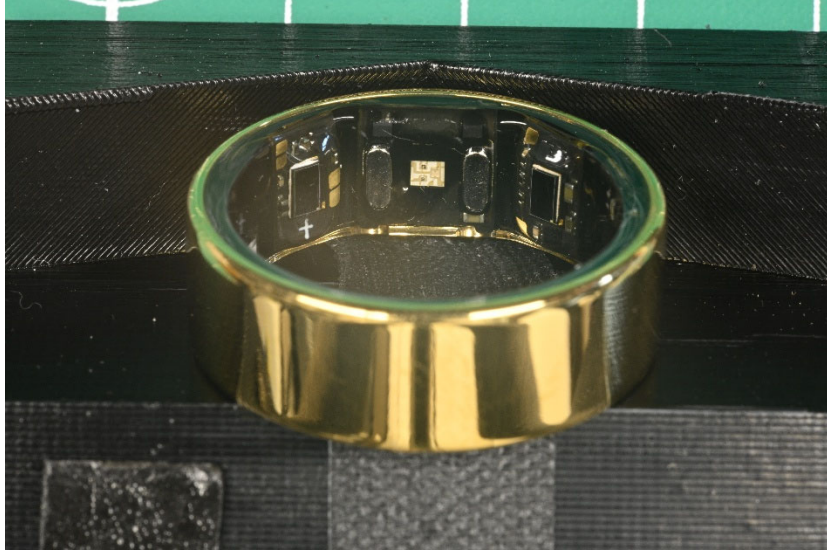
and in no way limit the discovery and infringement allegations against Defendants concerning other devices that incorporate the same or reasonably similar functionalities.

84. The Accused Product is observed to be a wearable ring device configured to be worn on a finger of a user. For example, the Accused Product is observed to be a smart ring wearable device. The Accused Product is observed to include an external housing and an internal housing wherein the external housing and the internal housing are coupled together to form the housing that encloses a curved battery, a printed circuit board, one or more components, and one or more processors. For example, the Accused Product includes a titanium housing with an internal housing that encloses a curved battery, printed circuit board, one or more components, and one or more processors. The Accused Product is further observed to include a curved battery within the housing electrically coupled to the printed circuit board, which is electrically coupled with one or more components. Additionally, the Accused Product is observed to include one or more components, including an accelerometer, a temperature sensor, a first light emitting diode (LED), a second LED, and one or more light sensors which are electrically coupled to one or more processors, individually or in combination. For example, the Accused Product includes an accelerometer, heart rate sensor (PPG – photoplethysmography), SpO<sub>2</sub> Sensor (pulse oximeter), and skin temperature sensor to acquire data from the user, such as the user's blood oxygenation level, heart rate, temperature, and activity level and are individually or in combination electrically coupled to one or more processors. The Accused Product is further observed to include one or more processors to process data acquired by the one or more components and analyze the one or more of the visible light, infrared light, or near-infrared light from the LEDs and one or more light sensors to determine a user's blood oxygenation level. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny->

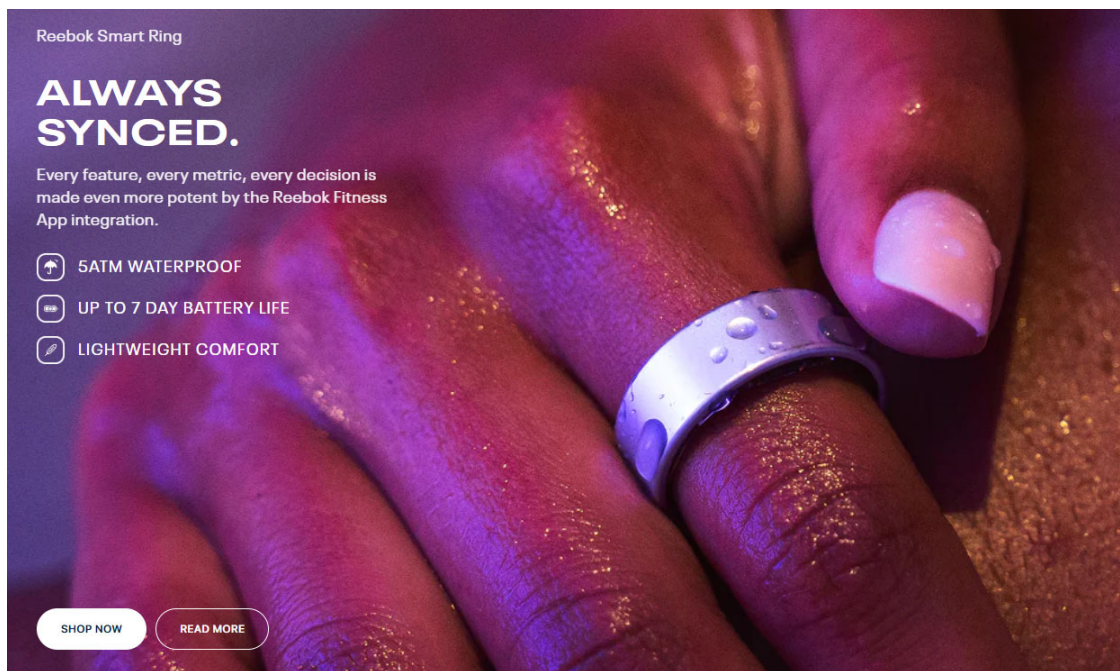
gold?op1=Default%20Title&op2=&op3= (last visited November 13, 2025);  
<https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

85. As shown below, images of an exemplary Accused Product, including the Reebok Smart Ring, provide non-limiting examples of the Accused Product infringing at least claim 1 of the '159 Patent by including “an external housing,” “an internal housing,” “a curved battery,” “a printed circuit board,” “one or more processors,” “accelerometer,” “temperature sensor,” a “first light emitting diode (LED),” “a second LED,” and “one or more light sensors” as claimed in the '159 Patent:





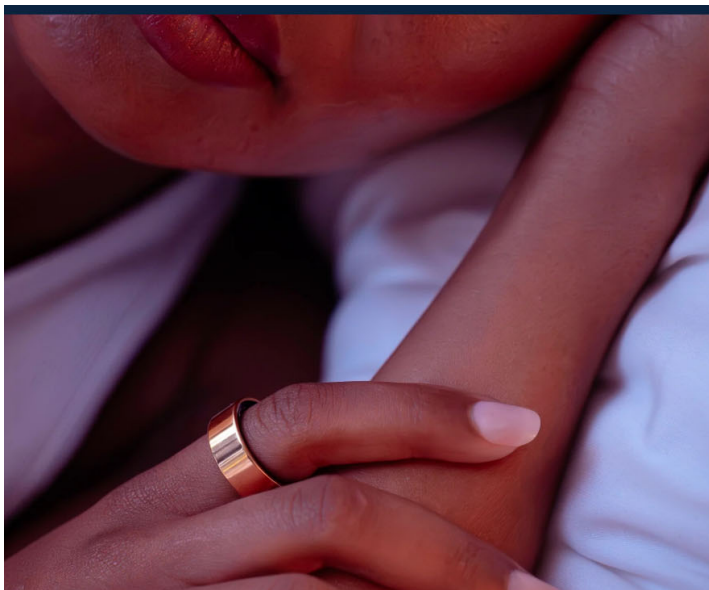
86. Similarly, the following excerpts from Defendants' websites provide non-limiting examples of the Accused Product infringing at least claim 1 of the '159 Patent:



## MOVEMENT IN MOTION

- ACTIVITY TRACKING**  
From walks to workouts, track your steps, distance, and calories throughout the day.
- EXERCISE MODE**  
Whether lifting, stretching, cycling, or sprinting; the ring adapts and syncs with the app to reflect your effort.
- ONE SCORE**  
Your daily green light, or your signal to slow down. This all-in-one score helps you understand when to push.





## BUILT FOR RECOVERY

### SLEEP TRACKING

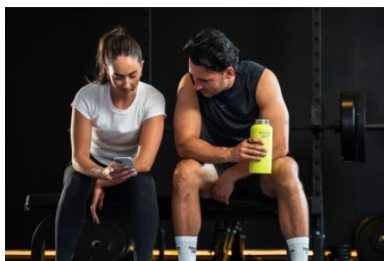
Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed picture of how you're actually resting. Wake up to sleep scores and data-driven guidance for more informed training and smoother recovery.

### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts in your overnight baseline temperature that may point to early illness, hormonal changes, or signs of overtraining.

### STRESS MONITORING

With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising stress levels. It doesn't just tell you when you're stressed, it guides you toward strategies that help.



### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



### SPO2 (BLOOD OXYGEN)







Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.

<https://www.reeboksmartring.com/> (last visited November 13, 2025).





WHAT THE RING TRACKS ^

 Heart Rate	 HRV	 SPO2
 Steps	 Sleep Duration & Sleep Stages	 Stress

REEBOK FITNESS MEMBERSHIP ^

Every purchase of a Reebok Smart Ring comes with a 1 year free membership to over 1,000+ hours of fitness & wellness content in the Reebok Fitness App

## DESIGNED FOR LIFE.

### SLEEK, COMFORTABLE DESIGN

Crafted for durability and wearability, the ring is lightweight yet sturdy - designed to be worn during workouts, sleep, or daily movement.

### SIMPLE CHARGING + LONG BATTERY

A compact charging dock makes top-ups easy; most users can go several days between charges with normal use.

### INTEGRATED APP EXPERIENCE

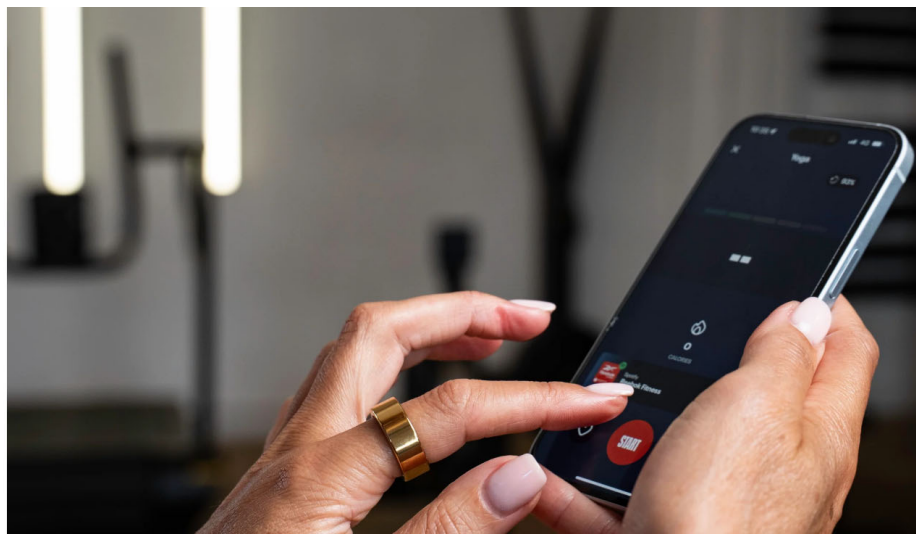
All data feeds into the Reebok Fitness App, where you can view trends, set goals, join challenges, and access guided wellness content

## ACTIONABLE INSIGHTS.

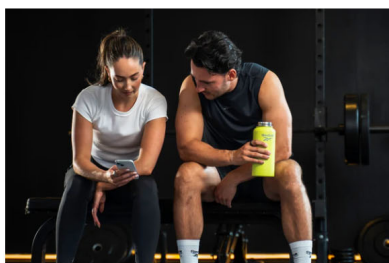
**ALL-DAY BIOMETRIC TRACKING**  
Monitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.

**EFFORTLESS CONNECTIVITY & SYNC**  
Bluetooth connection to the Reebok Fitness App ensures seamless data transfer.

**REAL-TIME PERFORMANCE & SLEEP INSIGHTS**  
Never accept a bad night's sleep again - with the Reebok Smart Ring, every minute is accounted for so you'll be informed about how you're sleeping.

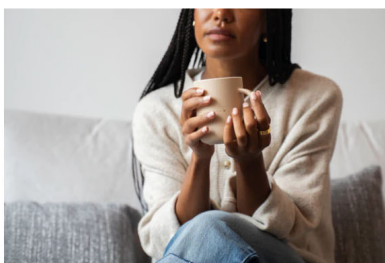


The future of wellness



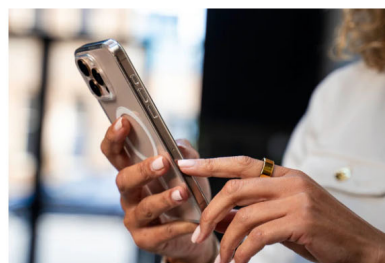
### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



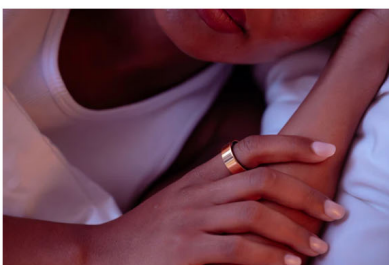
### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



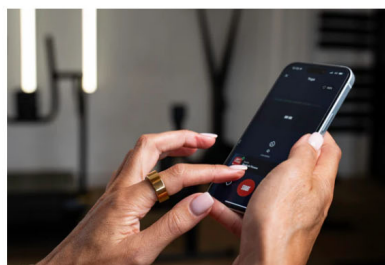
### SPO2 (BLOOD OXYGEN)

Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.



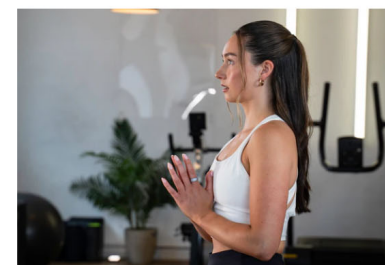
### SLEEP TRACKING

Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed.



### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts.



### STRESS MONITORING

With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising.

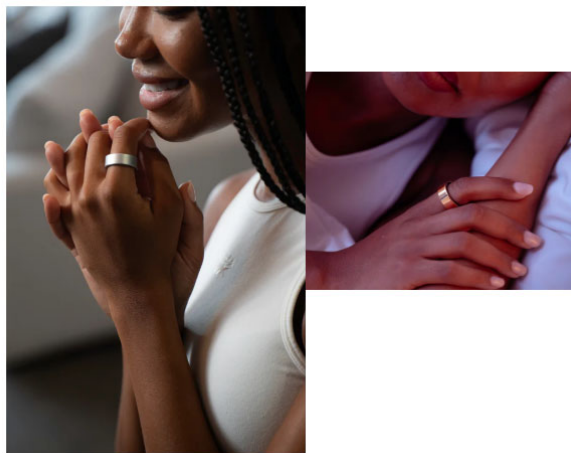
<https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025).

## HOW TO WEAR IT

To get the most accurate results from your Reebok Smart Ring:

1. Wear it on your index finger, preferably your non-dominant hand.
2. Ensure the sensor is facing your palm side.

*Top tip: stay still for a few moments during manual readings, like heart rate or SpO2.*

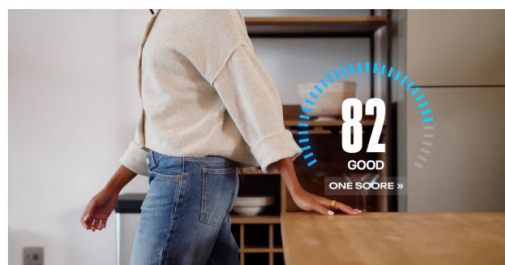


<https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025).

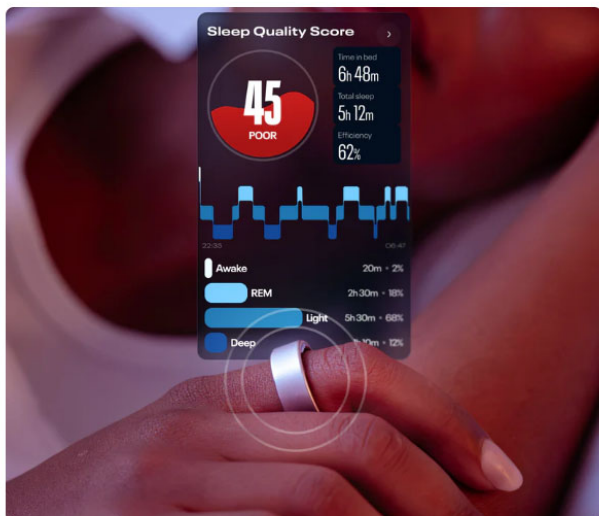


## UNDERSTANDING YOUR ONE SCORE

We've designed the score to stay simple and easy to understand. You don't need to dig into complicated data, just one clear number that shows how you're doing today. When one of these areas is out of balance, like missing your activity target, a restless night's sleep, or higher stress, your score may dip. That's not failure, it's a signpost, guiding you toward where to focus to feel better.



## HOW IT'S CALCULATED



### SLEEP QUALITY SCORE

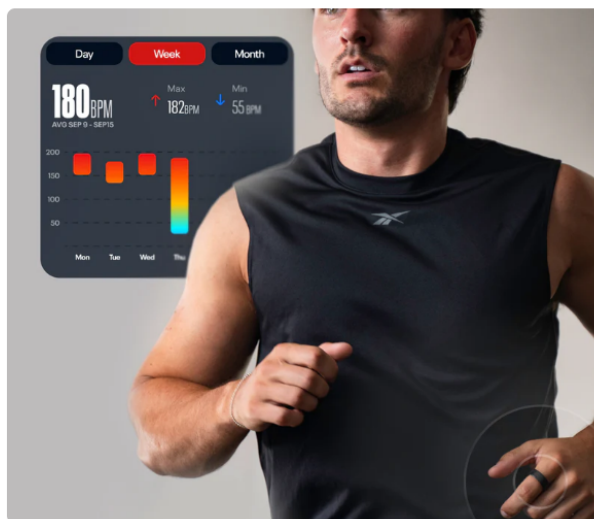
#### EVERY MINUTE TRACKED

The most important part of your day can happen before you wake up. How you sleep, and the stages of sleep you enjoy, are a core contributor to how your One Score is calculated.

### ACTIVITY SCORE

#### THE DATA IN EVERY MOVEMENT

Whether you're stretching, walking, running or all of the above, every time you move you contribute to your health & fitness. All activity is captured by the Reebok Smart Ring and integrated in to your One Score so you have a clear picture of just how hard you're pushing it.





## STRESS & RECOVERY

### BODY & MIND

Leveraging a variety of data points including HRV, the One Score builds in a cross section of health & wellness variables to provide an informed insight in to how well your body is recovering from stress - whether that be physical, mental or both.



#### GOOD

you're doing really well across most areas. Anywhere north of 86 and you're in your sweet spot of recovery and activity

#### NORMAL

you're making progress, but there's room to improve. It's worth digging in to your metrics to find out where you can make positive changes to your day or night

#### POOR

one or more areas are off balance. Start small and focus on one thing today that can compound in to change over time

<https://www.reeboksmartring.com/pages/one-score> (last visited November 13, 2025).

## What sensors does the Reebok Smart Ring use?

### Accelerometer

- Function: Detects movement and orientation.
- Purpose: Activity tracking, step count, sleep movement detection.
- Example Use: Tracking daily activity levels and differentiating sleep stages.

### Heart Rate Sensor (PPG - Photoplethysmography)

- Function: To measure blood flow.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### SpO<sub>2</sub> Sensor (Pulse Oximeter)

- Function: Measures oxygen saturation in the blood.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### Skin Temperature Sensor

- Function: Detects changes in finger skin temperature.
- Purpose: Stress and recovery.

<https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

87. The foregoing features of the Accused Product and Defendants' description and/or demonstration thereof, including in user manuals and advertising, reflect Defendants' direct infringement by satisfying every element of at least claim 1 of the '159 Patent, under 35 U.S.C. § 271(a).

88. Defendants have indirectly infringed at least claim 1 of the '159 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use,

offering for sale, selling, or importation of the Accused Product. Defendants' customers who purchase devices and components thereof and operate such devices and components in accordance with Defendants' instructions directly infringe one or more claims of the '159 Patent in violation of 35 U.S.C. § 271. Defendants instruct their customers through at least user guides or websites, such as those located at: <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/categories/29055239372317-Reebok-Smart-Ring> (last visited November 13, 2025).

89. For example, Defendants' website explains that users can “[m]onitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.” See <https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025). Defendants instruct their customers that “to get the most accurate results from your Reebok Smart Ring: 1. Wear it on your index finger, preferably your non-dominant hand. 2. Ensure the sensor is facing your palm side.” See <https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025). Further, Defendants state that “[b]uilt to integrate directly with the Ring, the Reebok Fitness App doesn't just house your data - it offers a library of fitness & wellness content for you to take action.” See <https://www.reeboksmartring.com/> (last visited November 13, 2025). Defendants also highlight the “activity tracking,” “exercise mode,” “one score,” “sleep tracking,” “skin temperature trend,” and “stress monitoring” features of the Reebok Smart Ring. See *id.*

90. Defendants are thereby liable for infringement of the '159 Patent pursuant to 35 U.S.C. § 271(b).

91. Defendants have indirectly infringed at least claim 1 of the '159 Patent, by, among other things, contributing to the direct infringement of others, including customers of the Accused Product by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the '159 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

92. For example, the Accused Product includes hardware and software for implementing health tracking functionality in a smart ring wearable, including a curved battery, housings, sensors, LEDs, and a printed circuit board. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Defendants are liable for infringement of the '159 Patent pursuant to 35 U.S.C. § 271(c).

93. Defendants have been on notice of the '159 Patent since, at least, the filing of this Complaint. By the time of trial, Defendants will thus have known and intended that their continued actions would directly infringe and/or actively induce or contribute to actual infringement of at least claim 1 of the '159 Patent.

94. Defendants undertook and continued their infringing actions despite an objectively high likelihood that such activities infringed the '159 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this Complaint, Defendants have been aware of an objectively high likelihood that their actions constituted and continue to constitute infringement of the '159 Patent, and that the '159 Patent is valid. On information and

belief, Defendants could not reasonably, subjectively believe that their actions do not constitute infringement of the '159 Patent, nor could they reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants continued their infringing activities. As such, Defendants have willfully infringed and continue to willfully infringe the '159 Patent.

95. Oura has been and continues to be damaged by Defendants' infringement of the '159 Patent.

**COUNT 4 - INFRINGEMENT OF U.S. PATENT NO. 12,393,227**

96. Oura incorporates paragraphs 1-95 above by reference.

97. U.S. Patent No. 12,393,227 (the "'227 Patent," attached hereto as Exhibit 4) duly issued on August 19, 2025, and is entitled *Wearable Computing Device*.

98. Ouraring Inc. is the owner by assignment of the '227 Patent and possesses all rights under the '227 Patent, including the exclusive right to recover for past and future infringement.

99. The '227 Patent is directed to a method of manufacturing a wearable ring device including, for example, a wearable ring device configured to be worn on a finger of a user.

100. Specifically, the '227 Patent discloses a method of manufacturing a wearable ring device configured to be worn on a finger of a user comprising constructing an external housing that has an exterior surface, an internal surface, a first sidewall and a second sidewall, wherein the internal surface, the first sidewall, and the second sidewall define an internal space of the external housing. *See* '227 Patent, Cl. 1. The claimed method includes steps of inserting a curved battery, a printed circuit board, and one or more components into a curved perimeter of the internal space of the external housing and applying an internal potting to at least partially fill the internal space of the external housing and cover the curved battery, the printed circuit board, and the one or more

components, wherein the internal potting adheres to the external housing. *See id.* Further, the claimed method includes a step of polymerizing the internal potting, wherein at least a layer of the internal potting forms an interior surface of the wearable ring device that is configured to contact tissue of the user when the wearable ring device is worn by the user. *See id.* The claimed method also defines the architecture of the wearable ring, claiming wherein the external housing and the internal potting form a housing for the wearable ring device, wherein the housing has an interior diameter between 12 mm and 24 mm, an exterior diameter between 18 mm and 30 mm, a width between 3 mm and 8 mm, and a thickness between 1.5 mm and 3 mm. *See id.* An exemplary configuration of a wearable ring device manufactured according to the claimed method is shown below in the excerpted Figures 12A, 12B, 12C, 13, 14A, 14D and 14E of the '227 Patent.

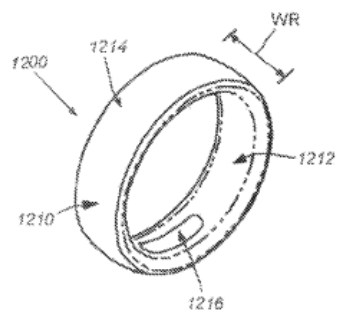


FIG. 12A

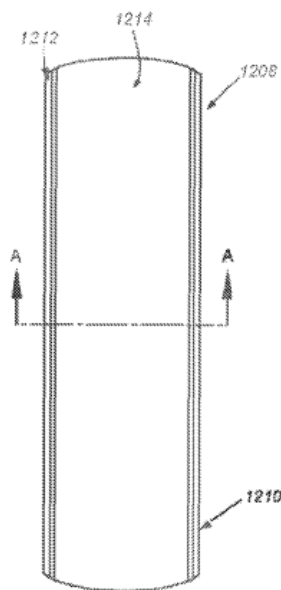


FIG. 12C

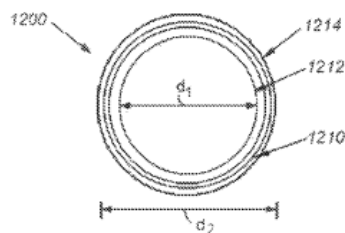


FIG. 12B

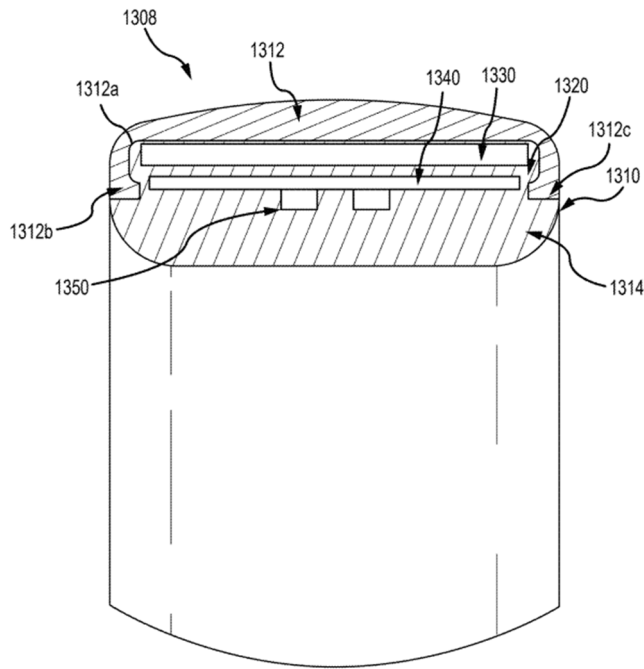


FIG. 13

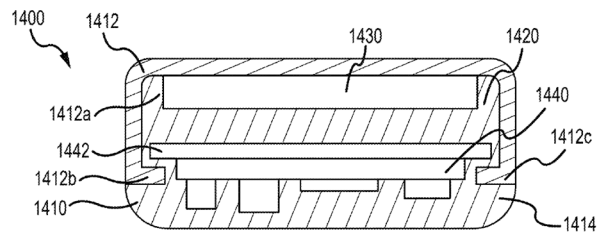


FIG. 14A

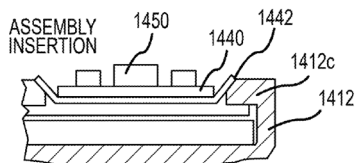


FIG.14D

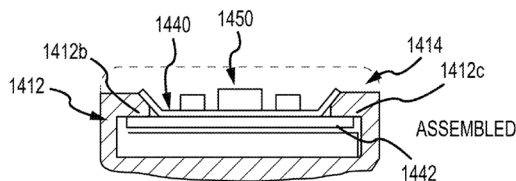


FIG.14E

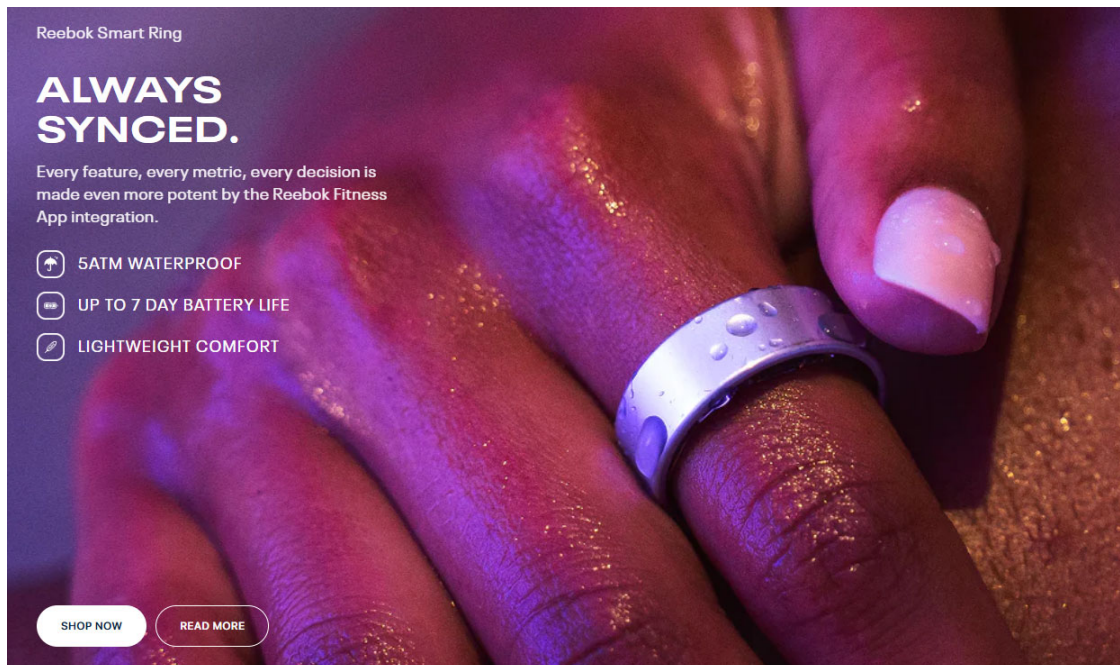
101. Defendants have directly infringed one or more claims of the '227 Patent in this District and elsewhere in Texas, including at least claim 1, literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling their smart ring technology, including at least Reebok-branded products having materially similar configurations to a wearable ring device.

102. For example, Defendants have literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the '227 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling the Accused Product. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Oura reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the Accused Product is identified to describe Defendants' infringement and in no way limit the discovery and infringement allegations against Defendants concerning other devices that incorporate the same or reasonably similar functionalities.




103. The Accused Product includes a wearable ring device. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). For example, the Accused

Product, including the Reebok Smart Ring, possesses “an external housing,” “an exterior surface,” “an internal surface,” “a first sidewall,” “a second sidewall,” “a curved battery,” “a printed circuit board,” “one or more components,” and “an internal potting” as claimed in the ’227 Patent.

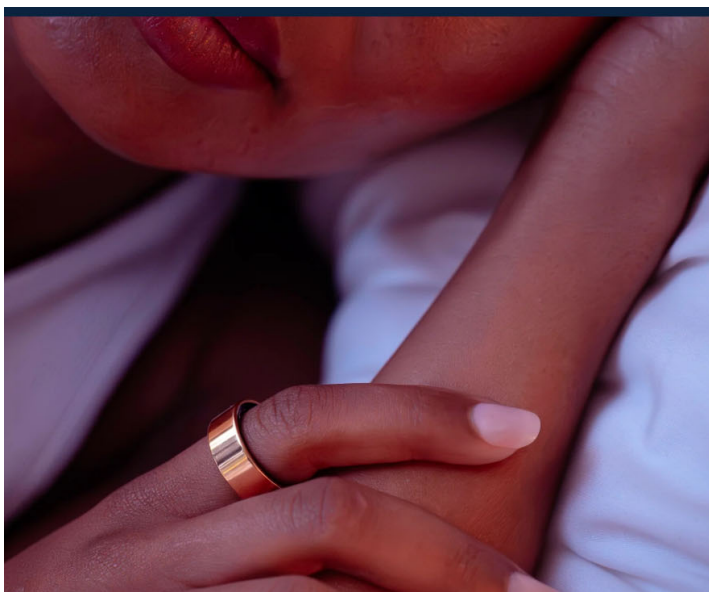
104. Similarly, the following excerpts from Defendants’ websites provide non-limiting examples of the Accused Product infringing at least claim 1 of the ’227 Patent:



## MOVEMENT IN MOTION

-  **ACTIVITY TRACKING**  
From walks to workouts, track your steps, distance, and calories throughout the day.
-  **EXERCISE MODE**  
Whether lifting, stretching, cycling, or sprinting, the ring adapts and syncs with the app to reflect your effort.
-  **ONE SCORE**  
Your daily green light, or your signal to slow down. This all-in-one score helps you understand when to push.





## BUILT FOR RECOVERY

### SLEEP TRACKING

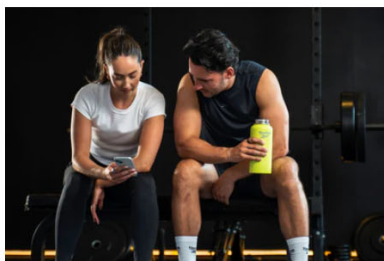
Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed picture of how you're actually resting. Wake up to sleep scores and data-driven guidance for more informed training and smoother recovery.

### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts in your overnight baseline temperature that may point to early illness, hormonal changes, or signs of overtraining.

### STRESS MONITORING

With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising stress levels. It doesn't just tell you when you're stressed, it guides you toward strategies that help.



### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



### SPO2 (BLOOD OXYGEN)







Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.

<https://www.reeboksmartring.com/> (last visited November 13, 2025).





WHAT THE RING TRACKS ^

 Heart Rate	 HRV	 SPO2
 Steps	 Sleep Duration & Sleep Stages	 Stress

REEBOK FITNESS MEMBERSHIP ^

Every purchase of a Reebok Smart Ring comes with a 1 year free membership to over 1,000+ hours of fitness & wellness content in the Reebok Fitness App

## DESIGNED FOR LIFE.

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Crafted for durability and wearability, the ring is lightweight yet sturdy - designed to be worn during workouts, sleep, or daily movement.

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A compact charging dock makes top-ups easy; most users can go several days between charges with normal use.

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All data feeds into the Reebok Fitness App, where you can view trends, set goals, join challenges, and access guided wellness content

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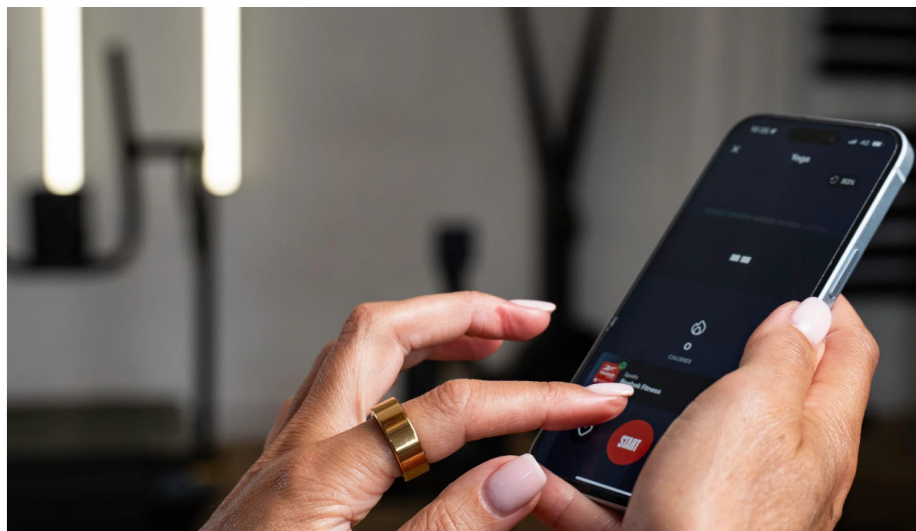
Monitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.

### EFFORTLESS CONNECTIVITY & SYNC

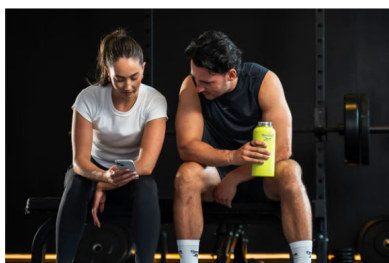
Bluetooth connection to the Reebok Fitness App ensures seamless data transfer.

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Never accept a bad night's sleep again - with the Reebok Smart Ring, every minute is accounted for so you'll be informed about how you're sleeping.



The future of wellness



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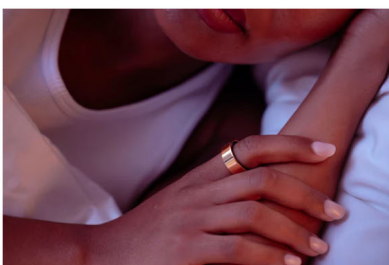
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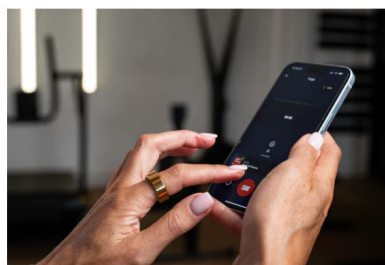
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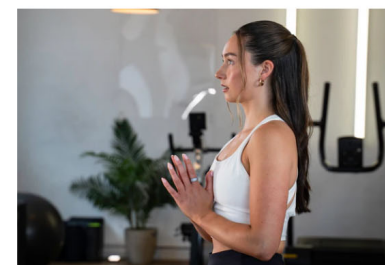
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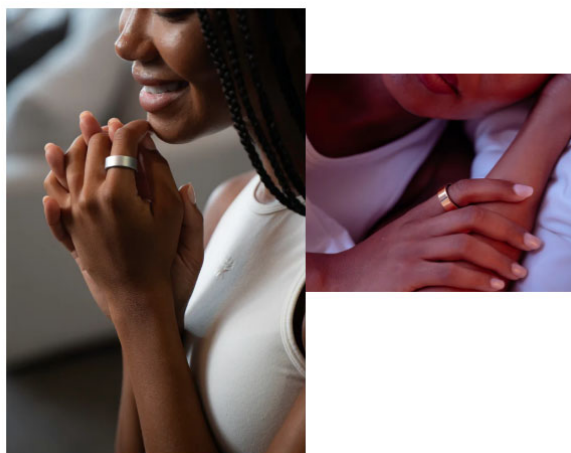
<https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025).

## HOW TO WEAR IT

To get the most accurate results from your Reebok Smart Ring:

1. Wear it on your index finger, preferably your non-dominant hand.
2. Ensure the sensor is facing your palm side.

*Top tip: stay still for a few moments during manual readings, like heart rate or SpO2.*

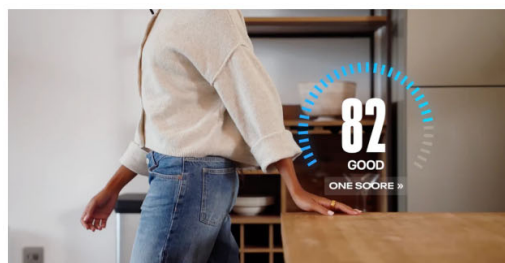


<https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025).

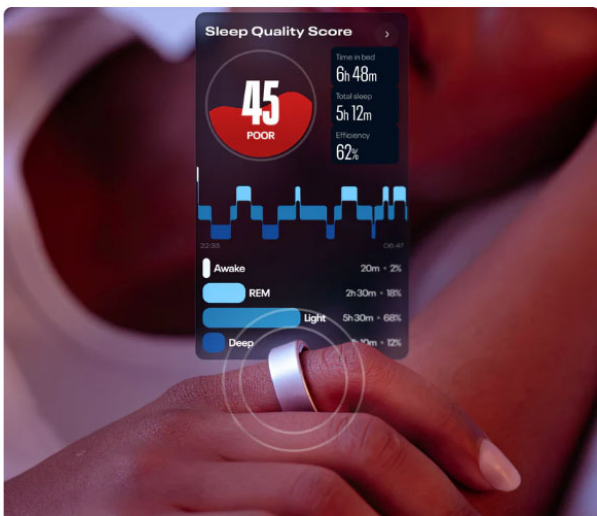


## UNDERSTANDING YOUR ONE SCORE

We've designed the score to stay simple and easy to understand. You don't need to dig into complicated data, just one clear number that shows how you're doing today. When one of these areas is out of balance, like missing your activity target, a restless night's sleep, or higher stress, your score may dip. That's not failure, it's a signpost, guiding you toward where to focus to feel better.



## HOW IT'S CALCULATED



### SLEEP QUALITY SCORE

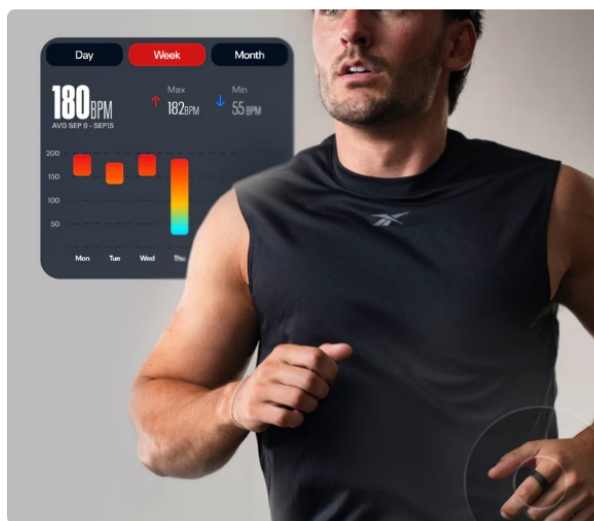
#### EVERY MINUTE TRACKED

The most important part of your day can happen before you wake up. How you sleep, and the stages of sleep you enjoy, are a core contributor to how your One Score is calculated.

### ACTIVITY SCORE

#### THE DATA IN EVERY MOVEMENT

Whether you're stretching, walking, running or all of the above, every time you move you contribute to your health & fitness. All activity is captured by the Reebok Smart Ring and integrated in to your One Score so you have a clear picture of just how hard you're pushing it.





## STRESS & RECOVERY

### BODY & MIND

Leveraging a variety of data points including HRV, the One Score builds in a cross section of health & wellness variables to provide an informed insight in to how well your body is recovering from stress - whether that be physical, mental or both.



#### GOOD

you're doing really well across most areas. Anywhere north of 86 and you're in your sweet spot of recovery and activity

#### NORMAL

you're making progress, but there's room to improve. It's worth digging in to your metrics to find out where you can make positive changes to your day or night

#### POOR

one or more areas are off balance. Start small and focus on one thing today that can compound in to change over time

<https://www.reeboksmartring.com/pages/one-score> (last visited November 13, 2025).

## What sensors does the Reebok Smart Ring use?

### Accelerometer

- Function: Detects movement and orientation.
- Purpose: Activity tracking, step count, sleep movement detection.
- Example Use: Tracking daily activity levels and differentiating sleep stages.

### Heart Rate Sensor (PPG - Photoplethysmography)

- Function: To measure blood flow.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### SpO<sub>2</sub> Sensor (Pulse Oximeter)

- Function: Measures oxygen saturation in the blood.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### Skin Temperature Sensor

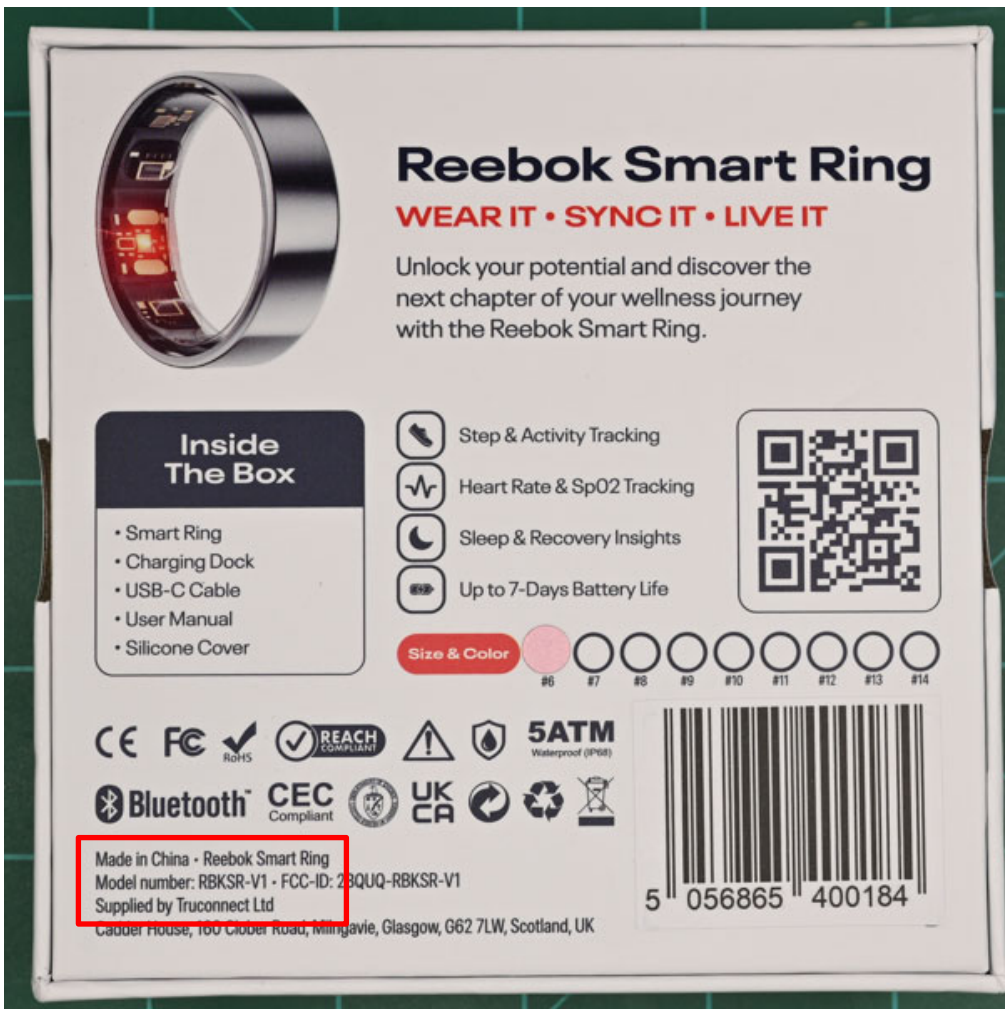
- Function: Detects changes in finger skin temperature.
- Purpose: Stress and recovery.

<https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

105. The foregoing features of the Accused Product and Defendants' description and/or demonstration thereof, including in user manuals and advertising, reflect Defendants' direct infringement by satisfying every element of at least claim 1 of the '227 Patent, under 35 U.S.C. § 271(a).

106. Similarly, on information and belief, Defendants import and/or sell within the United States after importation the Accused Product. For example, the product packaging for the

Accused Product indicates that the product is “Made in China,” “Supplied by Truconnect Ltd,” and imported into the United States thereafter:



107. Defendants are thereby liable for infringement of the '227 Patent pursuant to 35 U.S.C. § 271(g).

108. Defendants have indirectly infringed at least claim 1 of the '227 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of the Accused Product. On information and belief, Defendants purposefully causes their manufacturers through, for example, manufacturing agreements, to construct the Accused Product according to specifications provided by Defendants,

which is covered by the patented method. Further, on information and belief, Defendants direct their sales channel to sell the Accused Product in the United States and facilitates the sales in the United States by offering customers technical support, user guides, and limited warranties, for example. See <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://www.reeboksmartring.com/pages/terms-conditions> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/categories/29055239372317-Reebok-Smart-Ring> (last visited November 13, 2025). Such sales of the Accused Product in the United States directly infringe one or more claims of the '227 Patent in violation of 35 U.S.C. § 271.

109. Defendants are thereby liable for infringement of the '227 Patent pursuant to 35 U.S.C. § 271(b).

110. Defendants have been on notice of the '227 Patent since, at least, the filing of this Complaint. By the time of trial, Defendants will thus have known and intended that their continued actions would directly infringe and/or actively induce or contribute to actual infringement of at least claim 1 of the '227 Patent.

111. Defendants undertook and continued their infringing actions despite an objectively high likelihood that such activities infringed the '227 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this Complaint, Defendants have been aware of an objectively high likelihood that their actions constituted and continue to constitute infringement of the '227 Patent, and that the '227 Patent is valid. On information and belief, Defendants could not reasonably, subjectively believe that their actions do not constitute infringement of the '227 Patent, nor could it reasonably, subjectively believe that the patent is

invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants continued their infringing activities. As such, Defendants have willfully infringed and continues to willfully infringe the '227 Patent.

112. Oura has been and continues to be damaged by Defendants' infringement of the '227 Patent.

**COUNT 5 - INFRINGEMENT OF U.S. PATENT NO. 12,346,160**

113. Oura incorporates paragraphs 1-112 above by reference.

114. U.S. Patent No. 12,346,160 (the "160 Patent," attached hereto at Exhibit 5) duly issued on July 1, 2025, and is entitled *Wearable Computing Device*.

115. Ouraring Inc. is the owner by assignment of the '160 Patent and possesses all rights under the '160 Patent, including the exclusive right to recover for past and future infringement.

116. The '160 Patent is directed to a wearable ring device including, for example, a wearable ring device configured to be worn on a finger of a user. In particular, the apparatus disclosed in the '160 Patent ensure that a user can track their physical movement, skin temperature, heart rate, and blood oxygenation levels from sensing data obtained from the wearable ring device.

117. Specifically, the '160 Patent discloses a wearable ring device including "an external housing," "an internal potting," "a curved battery," "a printed circuit board," "accelerometer," "temperature sensor," a "first light emitting diode (LED)," "a second LED," and "one or more light sensors" that all work in conjunction to provide a wearable smart ring device. *See* '160 Patent, Cl. 1. Further, the housing has an interior diameter between 12 mm and 24 mm, an exterior diameter between 18 mm and 30 mm, a width between 3 mm and 8 mm, and a thickness between 1.5 mm and 3 mm where the external housing is made of a metallic material. *See id.* The sensors, including the accelerometer, temperature sensors, LEDs, and one or more light sensors, are

electrically coupled to the printed circuit board and the battery and are configured to acquire data, such as the heart rate and blood oxygenation level, from the user. *See id.* An exemplary configuration is shown below in the excerpted Figures 3B, 8, 12A, 12B, 12C, 13, and 15B of the '160 Patent.

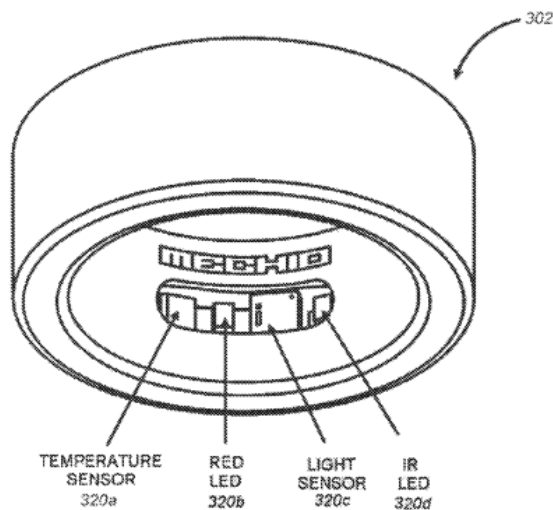


FIG. 3B

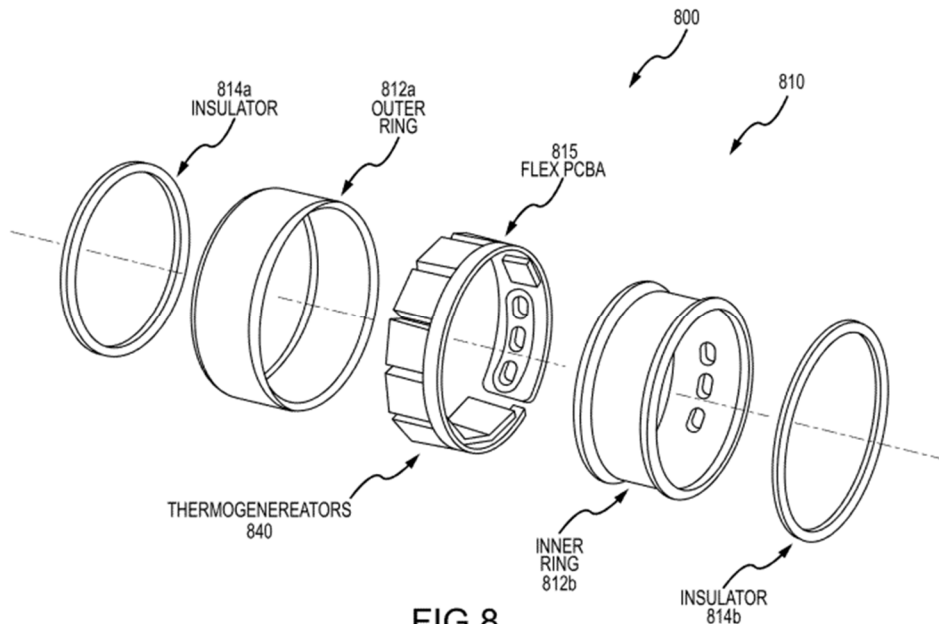


FIG. 8

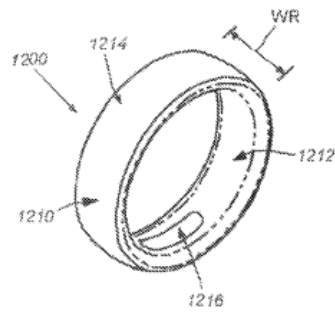


FIG. 12A

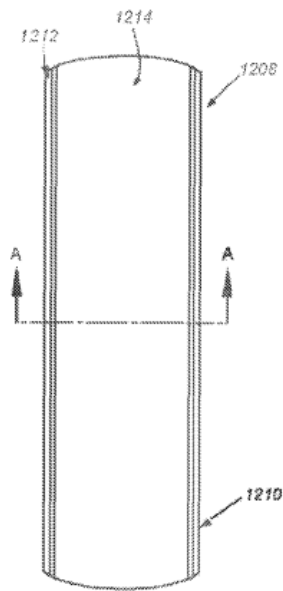


FIG. 12C

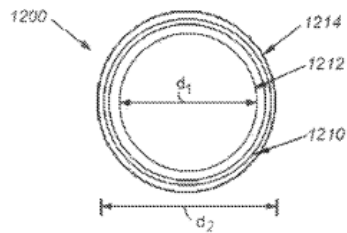


FIG. 12B

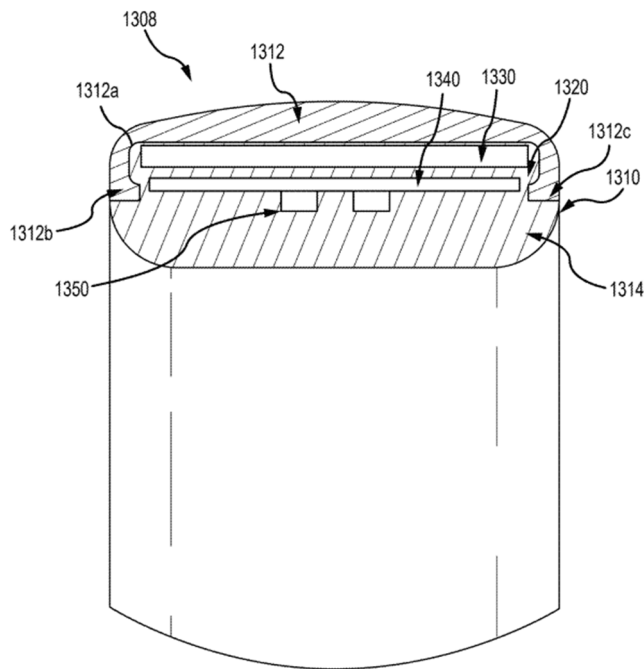


FIG. 13

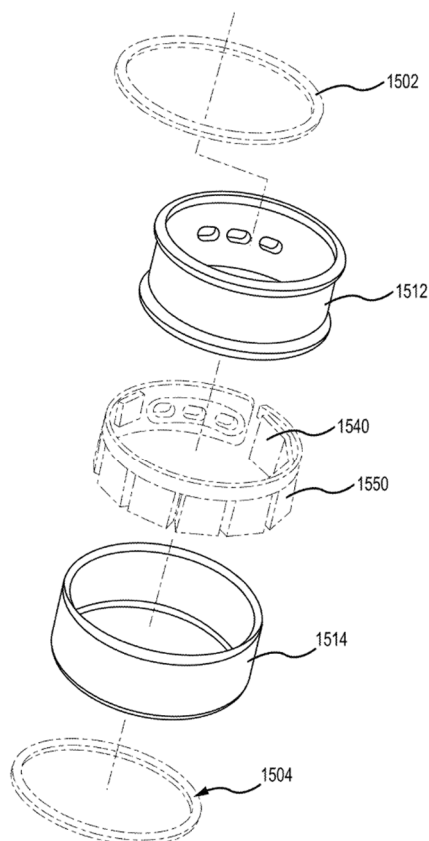


FIG.15B

118. Defendants have directly infringed one or more claims of the '160 Patent in this District and elsewhere in Texas, including at least claim 1, literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling their smart ring technology, including at least Reebok-branded products having materially similar configurations to a wearable ring device.

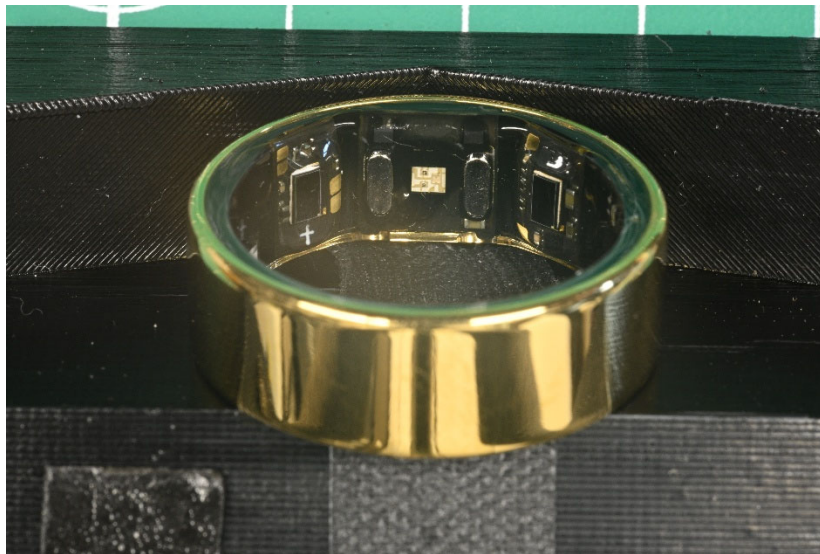
119. For example, Defendants have literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the '160 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling the Accused Products. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Oura reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the Accused Product is identified to describe Defendants' infringement

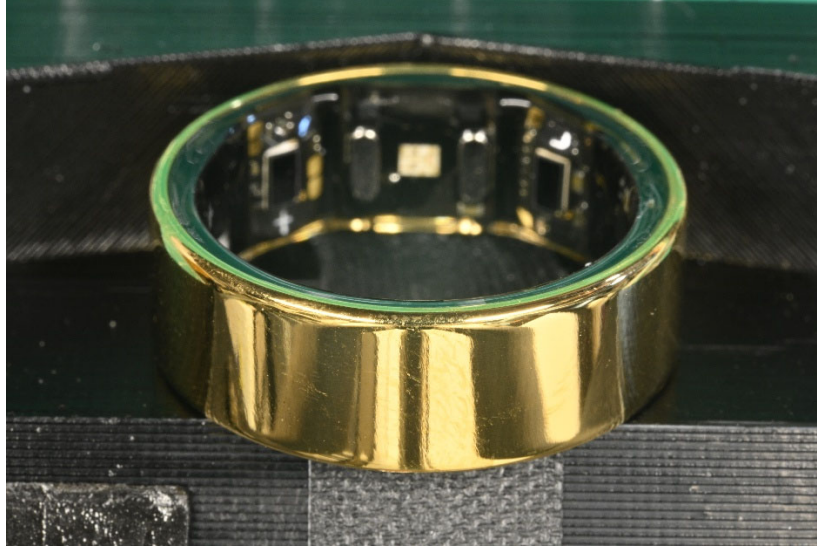
and in no way limit the discovery and infringement allegations against Defendants concerning other devices that incorporate the same or reasonably similar functionalities.

120. The Accused Product is observed to be a wearable ring device configured to be worn on a finger of a user. For example, the Accused Product is observed to be a smart ring wearable device. The Accused Product is observed to include a housing including an external housing of metallic material and an internal potting at least partially surrounding a curved battery, a printed circuit board, and one or more components. For example, the Accused Product includes a titanium housing with an internal potting at least partially surrounding a curved battery, printed circuit board, and one or more components. The Accused Product is further observed to include a curved battery within the housing electrically coupled to the printed circuit board, which is also electrically coupled to one or more components. Additionally, the Accused Product is observed to include one or more components, including an accelerometer, a temperature sensor, a first light emitting diode (LED), a second LED, and one or more light sensors to measure the heart rate and blood oxygenation level of the user. For example, the Accused Product includes an accelerometer, heart rate sensor (PPG – photoplethysmography), SpO<sub>2</sub> Sensor (pulse oximeter), and skin temperature sensor to acquire data from the user, such as the user's blood oxygenation level, heart rate, temperature, and activity level. See <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

121. As shown below, images of an exemplary Accused Product, including the Reebok Smart Ring, provide non-limiting examples of the Accused Product infringing at least claim 1 of

the '160 Patent by including “an external housing,” “an internal potting,” “a curved battery,” “a printed circuit board,” “accelerometer,” “temperature sensor,” a “first light emitting diode (LED),” “a second LED,” and “one or more light sensors” as claimed in the '160 Patent:








122. Similarly, the following excerpts from Defendants' websites provide non-limiting examples of the Accused Product infringing at least claim 1 of the '160 Patent:

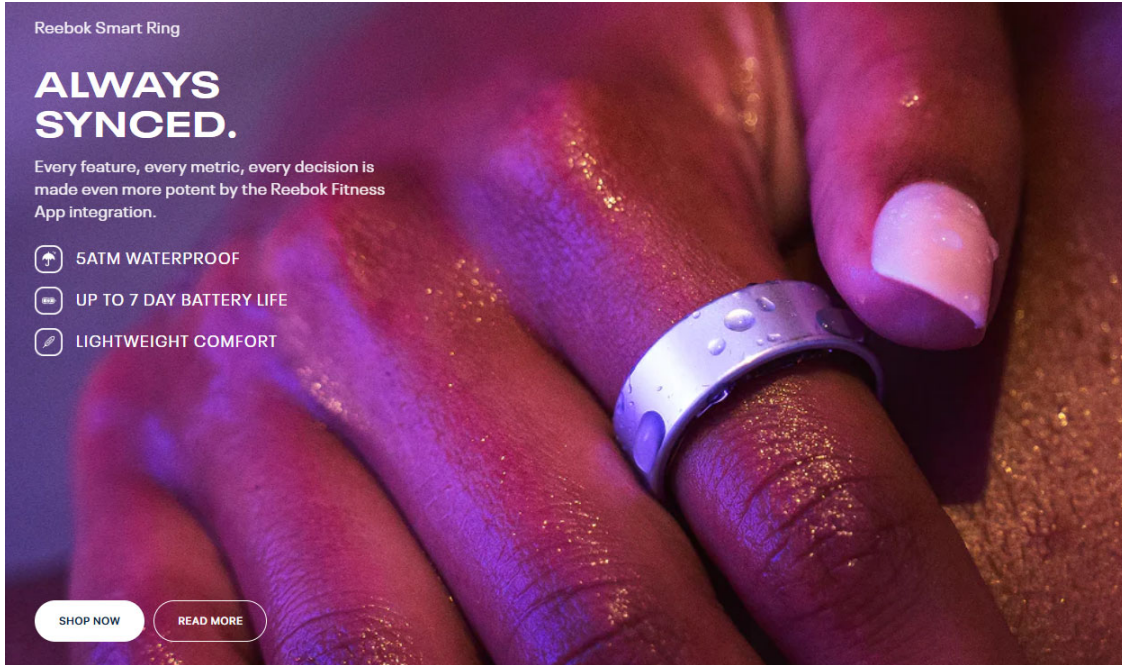
Reebok Smart Ring

## ALWAYS SYNCED.




Every feature, every metric, every decision is made even more potent by the Reebok Fitness App integration.

-  5ATM WATERPROOF
-  UP TO 7 DAY BATTERY LIFE
-  LIGHTWEIGHT COMFORT

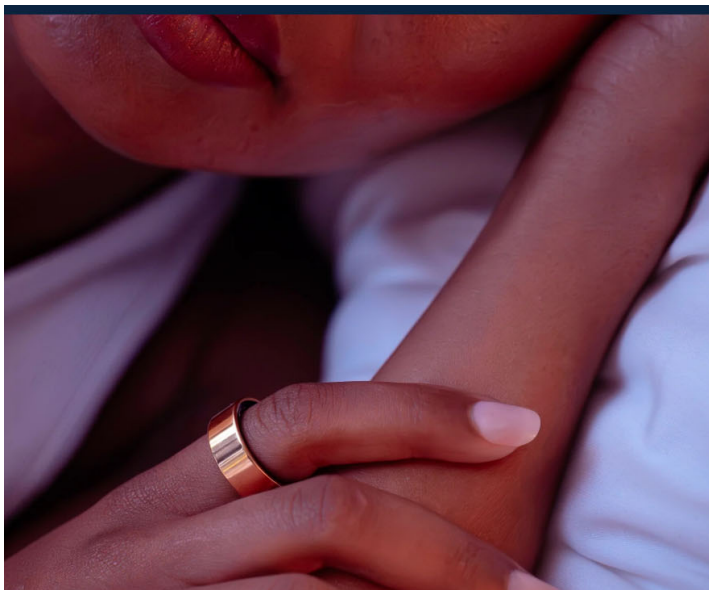
[SHOP NOW](#) [READ MORE](#)



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Whether lifting, stretching, cycling, or sprinting; the ring adapts and syncs with the app to reflect your effort.
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Your daily green light, or your signal to slow down. This all-in-one score helps you understand when to push.



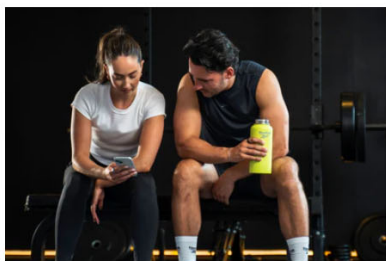


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HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



**SPO2 (BLOOD OXYGEN)**







Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.

<https://www.reeboksmartring.com/> (last visited November 13, 2025).





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 Steps	 Sleep Duration & Sleep Stages	 Stress

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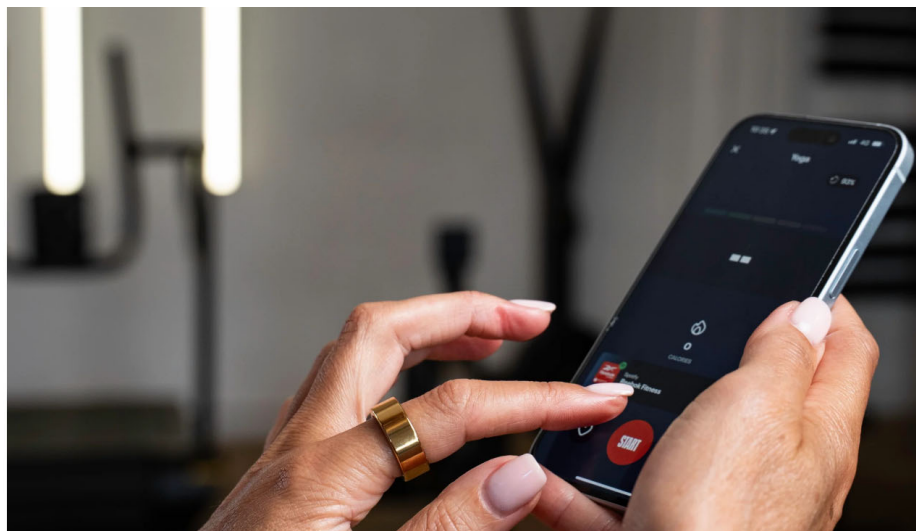
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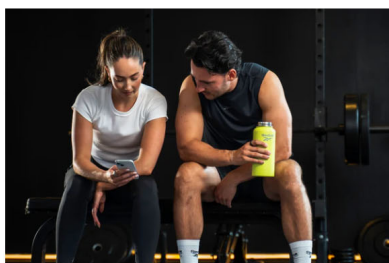
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The future of wellness



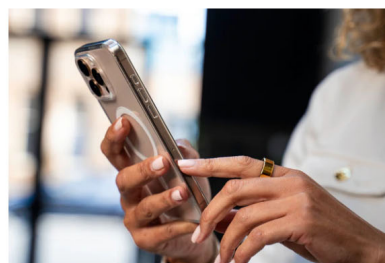
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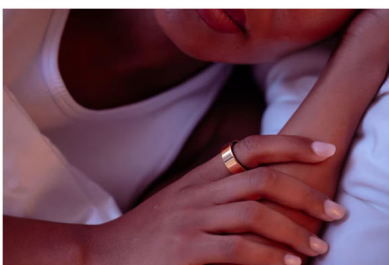
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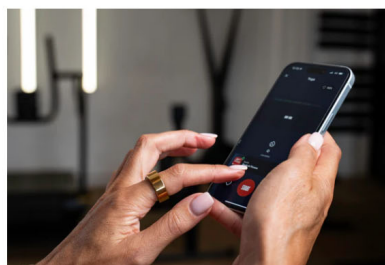
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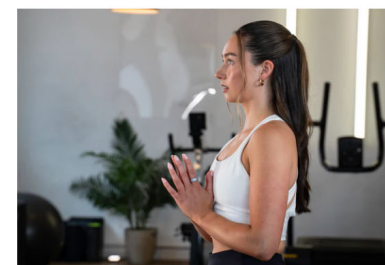
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With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising.

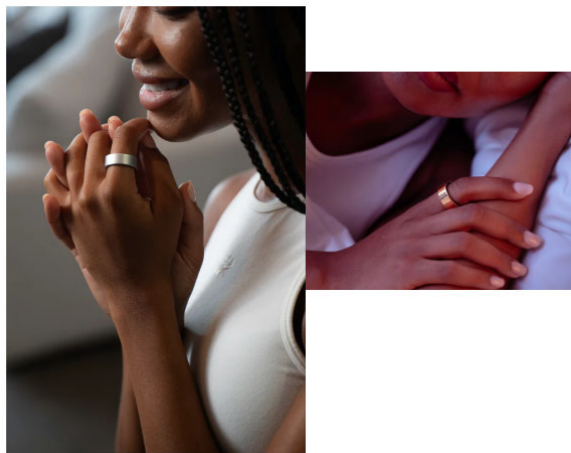
<https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025).

## HOW TO WEAR IT

To get the most accurate results from your Reebok Smart Ring:

1. Wear it on your index finger, preferably your non-dominant hand.
2. Ensure the sensor is facing your palm side.

*Top tip: stay still for a few moments during manual readings, like heart rate or SpO2.*

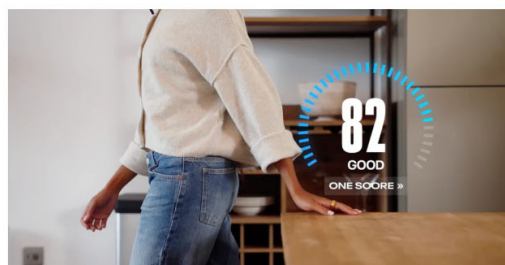


<https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025)

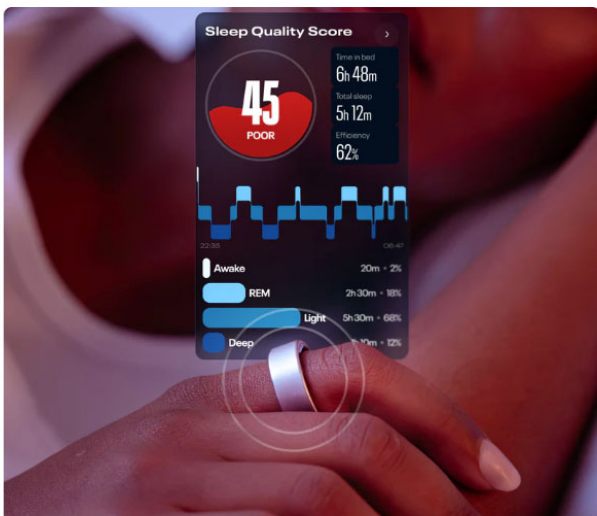


## UNDERSTANDING YOUR ONE SCORE

We've designed the score to stay simple and easy to understand. You don't need to dig into complicated data, just one clear number that shows how you're doing today. When one of these areas is out of balance, like missing your activity target, a restless night's sleep, or higher stress, your score may dip. That's not failure, it's a signpost, guiding you toward where to focus to feel better.



## HOW IT'S CALCULATED



### SLEEP QUALITY SCORE

#### EVERY MINUTE TRACKED

The most important part of your day can happen before you wake up. How you sleep, and the stages of sleep you enjoy, are a core contributor to how your One Score is calculated.

### ACTIVITY SCORE

#### THE DATA IN EVERY MOVEMENT

Whether you're stretching, walking, running or all of the above, every time you move you contribute to your health & fitness. All activity is captured by the Reebok Smart Ring and integrated in to your One Score so you have a clear picture of just how hard you're pushing it.





## STRESS & RECOVERY

### BODY & MIND

Leveraging a variety of data points including HRV, the One Score builds in a cross section of health & wellness variables to provide an informed insight in to how well your body is recovering from stress - whether that be physical, mental or both.



### GOOD

you're doing really well across most areas. Anywhere north of 86 and you're in your sweet spot of recovery and activity

### NORMAL

you're making progress, but there's room to improve. It's worth digging in to your metrics to find out where you can make positive changes to your day or night

### POOR

one or more areas are off balance. Start small and focus on one thing today that can compound in to change over time

<https://www.reeboksmartring.com/pages/one-score> (last visited November 13, 2025).

## What sensors does the Reebok Smart Ring use?

### Accelerometer

- Function: Detects movement and orientation.
- Purpose: Activity tracking, step count, sleep movement detection.
- Example Use: Tracking daily activity levels and differentiating sleep stages.

### Heart Rate Sensor (PPG - Photoplethysmography)

- Function: To measure blood flow.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### SpO<sub>2</sub> Sensor (Pulse Oximeter)

- Function: Measures oxygen saturation in the blood.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### Skin Temperature Sensor

- Function: Detects changes in finger skin temperature.
- Purpose: Stress and recovery.

<https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

123. The foregoing features of the Accused Product and Defendants' description and/or demonstration thereof, including in user manuals and advertising, reflect Defendants' direct infringement by satisfying every element of at least claim 1 of the '160 Patent, under 35 U.S.C. § 271(a).

124. Defendants have indirectly infringed at least claim 1 of the '160 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use,

offering for sale, selling, or importation of the Accused Product. Defendants' customers who purchase devices and components thereof and operate such devices and components in accordance with Defendants' instructions directly infringe one or more claims of the '160 Patent in violation of 35 U.S.C. § 271. Defendants instruct their customers through at least user guides or websites, such as those located at <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/categories/29055239372317-Reebok-Smart-Ring> (last visited November 13, 2025).

125. For example, Defendants' website explains that users can “[m]onitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.” *See* <https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025). Defendants instruct their customers that “to get the most accurate results from your Reebok Smart Ring: 1. Wear it on your index finger, preferably your non-dominant hand. 2. Ensure the sensor is facing your palm side.” *See* <https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025). Further, Defendants state that “[b]uilt to integrate directly with the Ring, the Reebok Fitness App doesn't just house your data - it offers a library of fitness & wellness content for you to take action.” *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Defendants also highlight the “activity tracking,” “exercise mode,” “one score,” “sleep tracking,” “skin temperature trend,” and “stress monitoring” features of the Reebok Smart Ring. *See id.*

126. Defendants are thereby liable for infringement of the '160 Patent pursuant to 35 U.S.C. § 271(b).

127. Defendants have indirectly infringed at least claim 1 of the '160 Patent, by, among other things, contributing to the direct infringement of others, including customers of the Accused Product by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the '160 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

128. For example, the Accused Product includes hardware and software for implementing health tracking functionality in a smart ring wearable, including a curved battery, housings, sensors, LEDs, and a printed circuit board. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Defendants are liable for infringement of the '160 Patent pursuant to 35 U.S.C. § 271(c).

129. Defendants have been on notice of the '160 Patent since, at least, the filing of this Complaint. By the time of trial, Defendants will thus have known and intended that their continued actions would directly infringe and/or actively induce or contribute to actual infringement of at least claim 1 of the '160 Patent.

130. Defendants undertook and continued their infringing actions despite an objectively high likelihood that such activities infringed the '160 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this Complaint, Defendants have been aware of an objectively high likelihood that their actions constituted and continue to constitute infringement of the '160 Patent, and that the '160 Patent is valid. On information and

belief, Defendants could not reasonably, subjectively believe that their actions do not constitute infringement of the '160 Patent, nor could they reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants continued their infringing activities. As such, Defendants have willfully infringed and continues to willfully infringe the '160 Patent.

131. Oura has been and continues to be damaged by Defendants' infringement of the '160 Patent.

**COUNT 6 - INFRINGEMENT OF U.S. PATENT NO. 12,422,889**

132. Oura incorporates paragraphs 1-131 above by reference.

133. U.S. Patent No. 12,422,889 (the "'889 Patent," attached hereto at Exhibit 6) duly issued on September 23, 2025, and is entitled *Wearable Computing Device*.

134. Ouraring Inc. is the owner by assignment of the '889 Patent and possesses all rights under the '889 Patent, including the exclusive right to recover for past and future infringement.

135. The '889 Patent is directed to a wearable ring device including, for example, a wearable ring device configured to be worn on a finger of a user. In particular, the apparatus disclosed in the '889 Patent ensure that a user can track their physical movement, skin temperature, heart rate, and blood oxygenation levels from sensing data obtained from the wearable ring device.

136. Specifically, the '889 Patent discloses a wearable ring device including "an external housing," "an internal potting," "a curved battery," "a printed circuit board," "accelerometer," "temperature sensor," a "first light emitting diode (LED)," "a second LED," and "one or more light sensors" that all work in conjunction to provide a wearable smart ring device. *See* '889 Patent, Cl. 1. Further, the external housing is made of a metallic material and has an exterior surface, an internal surface, a first flange, and a second flange. *See id.* The internal surface, the first flange, and the second flange create an internal space of the exterior housing. *See id.* The curved battery

and printed circuit board extend along the curved perimeter of the external housing. *See id.* The internal potting at least partially surrounds a curved battery, a printed circuit board, and one or more components, and wherein at least a portion of the internal potting forms an interior surface of the wearable ring device that contacts the user's finger. *See id.* The sensors, including the accelerometer, temperature sensors, LEDs, and one or more light sensors, are electrically coupled to the printed circuit board and the battery and are configured to acquire data, such as the heart rate and blood oxygenation level, from the user. *See id.* An exemplary configuration is shown below in the excerpted Figures 3B, 8, 12A, 12B, 12C, 13, and 15B of the '889 Patent.

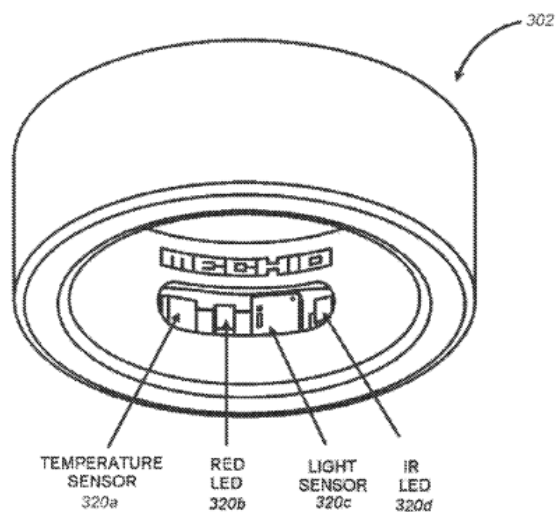
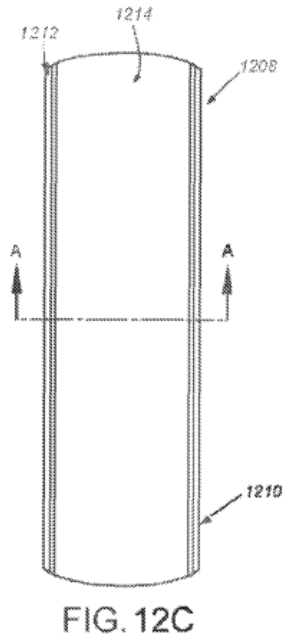
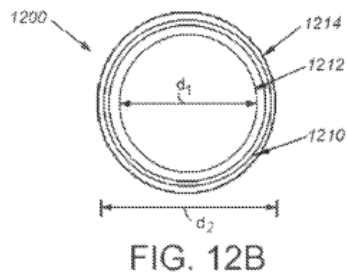
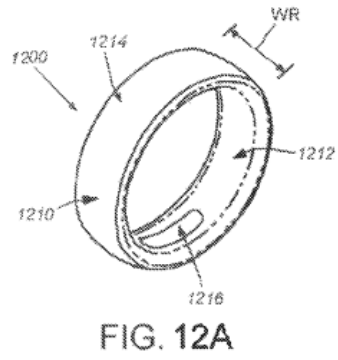
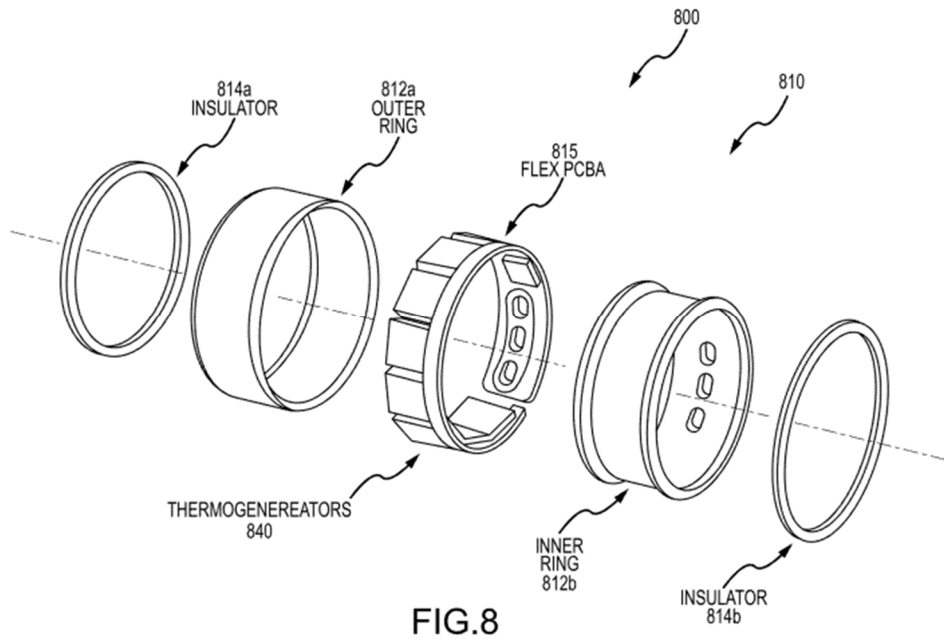


FIG. 3B



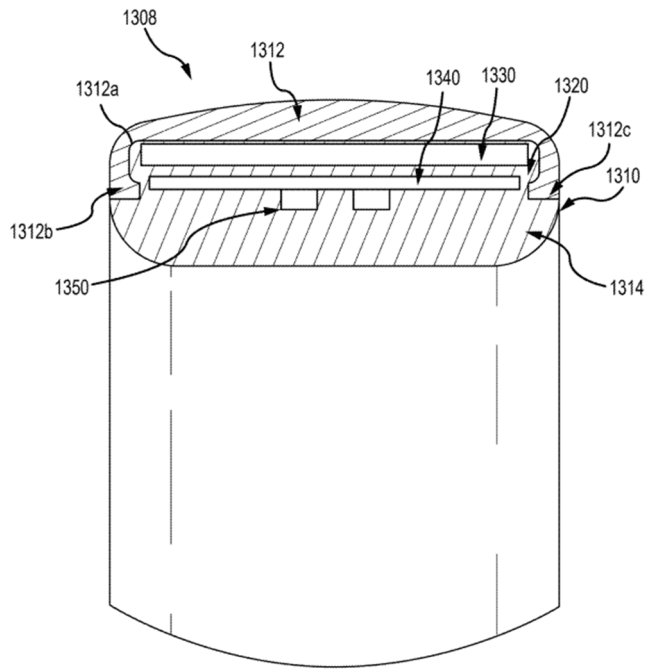


FIG. 13

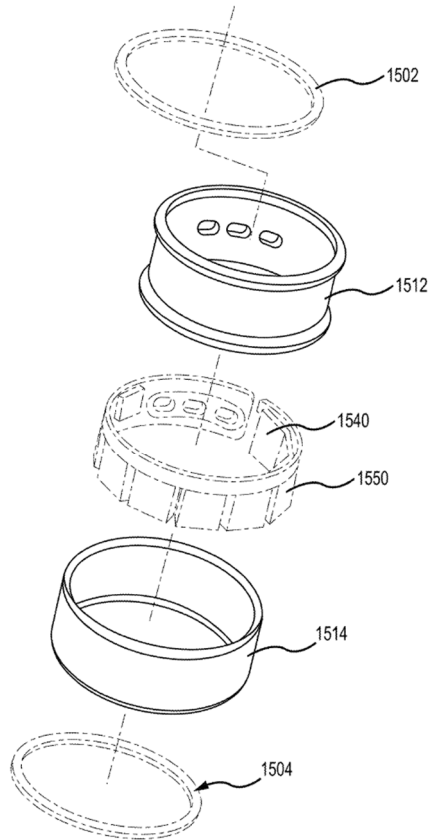


FIG. 15B

137. Defendants have directly infringed one or more claims of the '889 Patent in this District and elsewhere in Texas, including at least claim 1, literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling their smart ring technology, including at least Reebok-branded products having materially similar configurations to a wearable ring device.

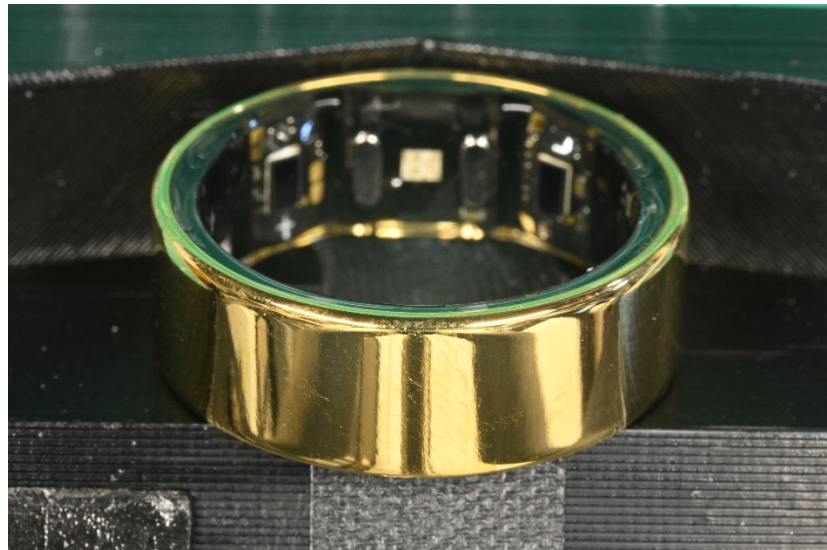
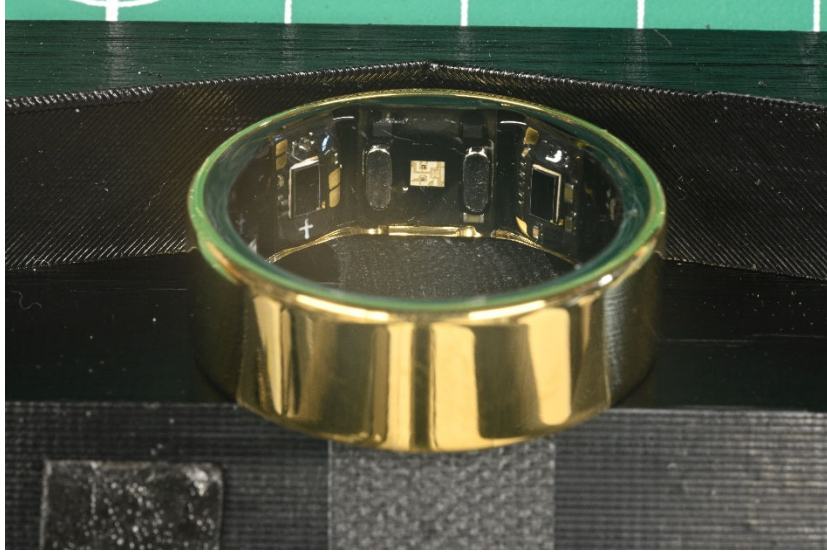
138. For example, Defendants have literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the '889 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling the Accused Products. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Oura reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the Accused Product is identified to describe Defendants' infringement and in no way limit the discovery and infringement allegations against Defendants concerning other devices that incorporate the same or reasonably similar functionalities.

139. The Accused Product is observed to be a wearable ring device configured to be worn on a finger of a user. For example, the Accused Product is observed to be a smart ring wearable device. The Accused Product is observed to include a housing including an external housing of metallic material and an internal potting at least partially surrounding a curved battery, a printed circuit board, and one or more components. For example, the Accused Product includes a titanium housing with an internal potting at least partially surrounding a curved battery, printed circuit board, and one or more components, which are further enclosed by the external housing and internal potting. The Accused Product is further observed to include a curved battery within the housing electrically coupled to the printed circuit board, which is also electrically coupled with one or more components. Additionally, the Accused Product is observed to include one or more

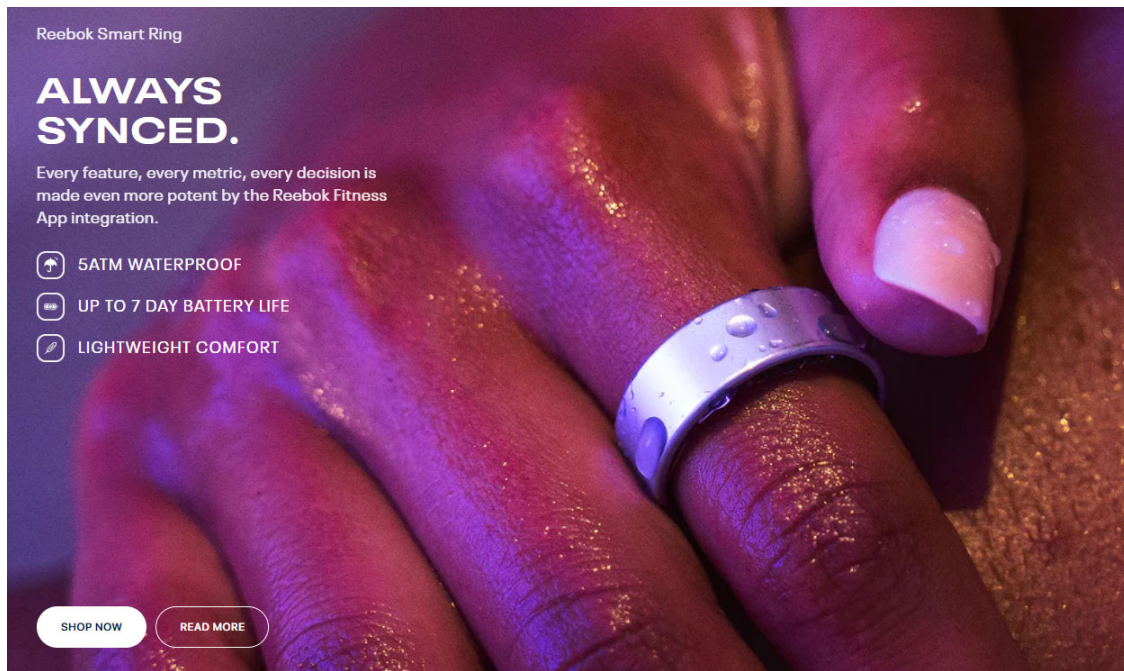
components, including an accelerometer, a temperature sensor, a first light emitting diode (LED), a second LED, and one or more light sensors to measure the heart rate and blood oxygenation level of the user. For example, the Accused Product includes an accelerometer, heart rate sensor (PPG – photoplethysmography), SpO<sub>2</sub> Sensor (pulse oximeter), and skin temperature sensor to acquire data from the user, such as the user’s blood oxygenation level, heart rate, temperature, and activity level. See <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

140. As shown below, images of an exemplary Accused Product, including the Reebok Smart Ring, provide non-limiting examples of the Accused Product infringing at least claim 1 of the ’889 Patent by including “an external housing,” “an internal potting,” “a curved battery,” “a printed circuit board,” “accelerometer,” “temperature sensor,” a “first light emitting diode (LED),” “a second LED,” and “one or more light sensors” as claimed in the ’889 Patent:





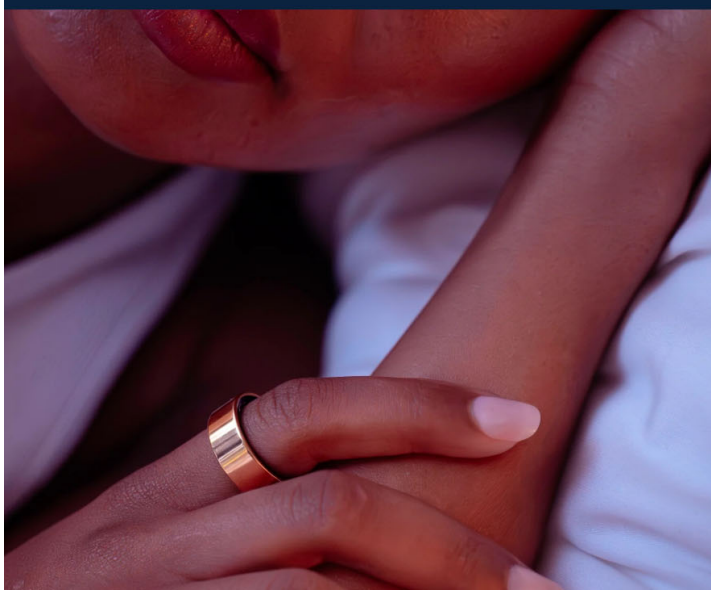
141. Similarly, the following excerpts from Defendants' websites provide non-limiting examples of the Accused Product infringing at least claim 1 of the '889 Patent:



## MOVEMENT IN MOTION

- ACTIVITY TRACKING**  
From walks to workouts, track your steps, distance, and calories throughout the day.
- EXERCISE MODE**  
Whether lifting, stretching, cycling, or sprinting; the ring adapts and syncs with the app to reflect your effort.
- ONE SCORE**  
Your daily green light, or your signal to slow down. This all-in-one score helps you understand when to push.



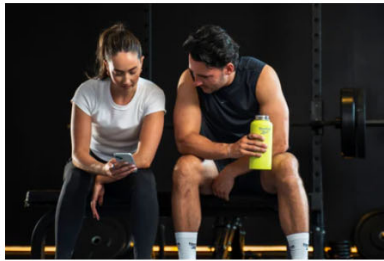


## BUILT FOR RECOVERY

**SLEEP TRACKING**  
Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed picture of how you're actually resting. Wake up to sleep scores and data-driven guidance for more informed training and smoother recovery.

**SKIN TEMPERATURE TREND**  
Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts in your overnight baseline temperature that may point to early illness, hormonal changes, or signs of overtraining.

**STRESS MONITORING**  
With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising stress levels. It doesn't just tell you when you're stressed, it guides you toward strategies that help.



### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



### SPO2 (BLOOD OXYGEN)







Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.

<https://www.reeboksmartring.com/> (last visited November 13, 2025).





WHAT THE RING TRACKS ^

 Heart Rate	 HRV	 SPO2
 Steps	 Sleep Duration & Sleep Stages	 Stress

REEBOK FITNESS MEMBERSHIP ^

Every purchase of a Reebok Smart Ring comes with a 1 year free membership to over 1,000+ hours of fitness & wellness content in the Reebok Fitness App

## DESIGNED FOR LIFE.

### SLEEK, COMFORTABLE DESIGN

Crafted for durability and wearability, the ring is lightweight yet sturdy - designed to be worn during workouts, sleep, or daily movement.

### SIMPLE CHARGING + LONG BATTERY

A compact charging dock makes top-ups easy; most users can go several days between charges with normal use.

### INTEGRATED APP EXPERIENCE

All data feeds into the Reebok Fitness App, where you can view trends, set goals, join challenges, and access guided wellness content

## ACTIONABLE INSIGHTS.

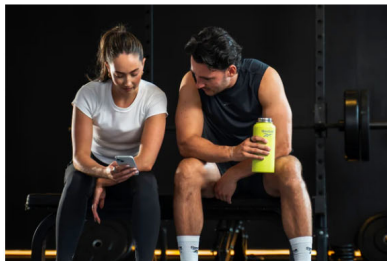
**ALL-DAY BIOMETRIC TRACKING**  
Monitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.

**EFFORTLESS CONNECTIVITY & SYNC**  
Bluetooth connection to the Reebok Fitness App ensures seamless data transfer.

**REAL-TIME PERFORMANCE & SLEEP INSIGHTS**  
Never accept a bad night's sleep again - with the Reebok Smart Ring, every minute is accounted for so you'll be informed about how you're sleeping.



The future of wellness



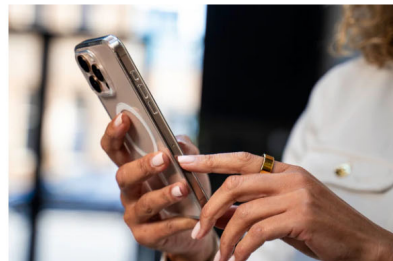
### 24/7 HEART RATE MONITORING

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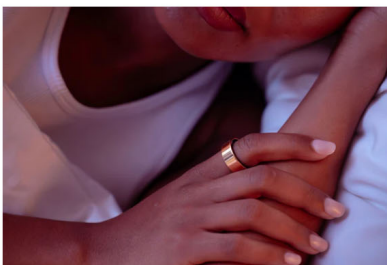
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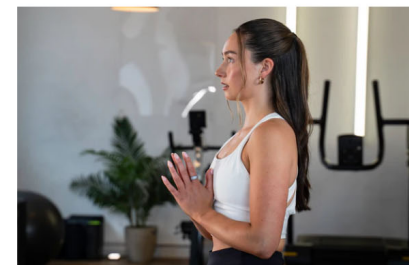
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Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed.



### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts.



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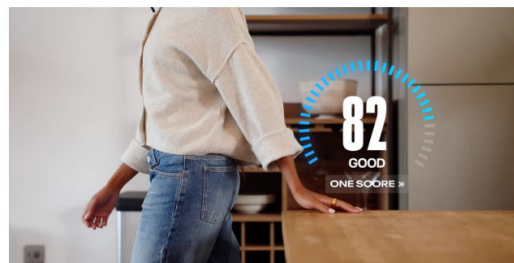


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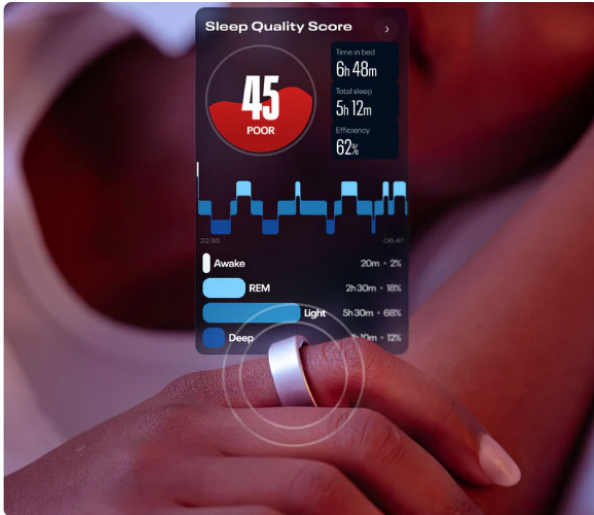


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### SLEEP QUALITY SCORE

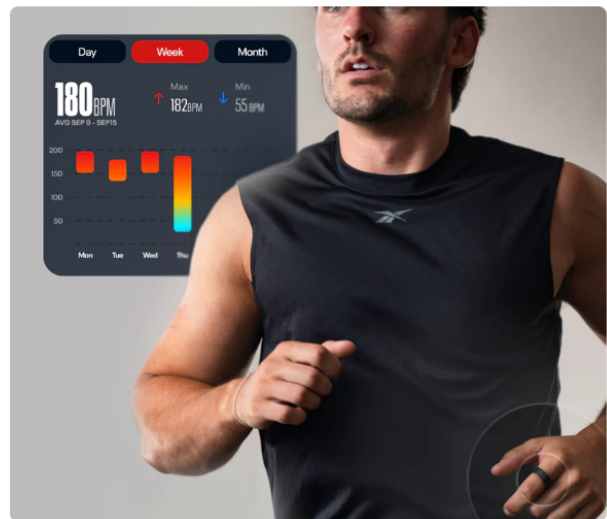
#### EVERY MINUTE TRACKED

The most important part of your day can happen before you wake up. How you sleep, and the stages of sleep you enjoy, are a core contributor to how your One Score is calculated.

### ACTIVITY SCORE

#### THE DATA IN EVERY MOVEMENT

Whether you're stretching, walking, running or all of the above, every time you move you contribute to your health & fitness. All activity is captured by the Reebok Smart Ring and integrated in to your One Score so you have a clear picture of just how hard you're pushing it.





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- Function: Measures oxygen saturation in the blood.
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- Function: Detects changes in finger skin temperature.
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142. The foregoing features of the Accused Product and Defendants' description and/or demonstration thereof, including in user manuals and advertising, reflect Defendants' direct infringement by satisfying every element of at least claim 1 of the '889 Patent, under 35 U.S.C. § 271(a).

143. Defendants have indirectly infringed at least claim 1 of the '889 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use,

offering for sale, selling, or importation of the Accused Product. Defendants' customers who purchase devices and components thereof and operate such devices and components in accordance with Defendants' instructions directly infringe one or more claims of the '889 Patent in violation of 35 U.S.C. § 271. Defendants instruct their customers through at least user guides or websites, such as those located at: <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/categories/29055239372317-Reebok-Smart-Ring> (last visited November 13, 2025).

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145. Defendants are thereby liable for infringement of the '889 Patent pursuant to 35 U.S.C. § 271(b).

146. Defendants have indirectly infringed at least claim 1 of the '889 Patent, by, among other things, contributing to the direct infringement of others, including customers of the Accused Product by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the '889 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

147. For example, the Accused Product includes hardware and software for implementing health tracking functionality in a smart ring wearable, including a curved battery, housings, sensors, LEDs, and a printed circuit board. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Defendants are liable for infringement of the '889 Patent pursuant to 35 U.S.C. § 271(c).

148. Defendants have been on notice of the '889 Patent since, at least, the filing of this Complaint. By the time of trial, Defendants will thus have known and intended that their continued actions would directly infringe and/or actively induce or contribute to actual infringement of at least claim 1 of the '889 Patent.

149. Defendants undertook and continued their infringing actions despite an objectively high likelihood that such activities infringed the '889 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this Complaint, Defendants have been aware of an objectively high likelihood that their actions constituted and continue to constitute infringement of the '889 Patent, and that the '889 Patent is valid. On information and

belief, Defendants could not reasonably, subjectively believe that their actions do not constitute infringement of the '889 Patent, nor could they reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants continued their infringing activities. As such, Defendants have willfully infringed and continues to willfully infringe the '889 Patent.

150. Oura has been and continues to be damaged by Defendants' infringement of the '889 Patent.

**COUNT 7 - INFRINGEMENT OF U.S. PATENT NO. 12,429,909**

151. Oura incorporates paragraphs 1-150 above by reference.

152. U.S. Patent No. 12,429,909 (the "'909 Patent," attached hereto as Exhibit 7) duly issued on September 30, 2025, and is entitled *Wearable Computing Device*.

153. Ouraring Inc. is the owner by assignment of the '909 Patent and possesses all rights under the '909 Patent, including the exclusive right to recover for past and future infringement.

154. The '909 Patent is directed to a method of manufacturing a wearable ring device including, for example, a wearable ring device configured to be worn on a finger of a user.

155. Specifically, the '909 Patent discloses a method of manufacturing a wearable ring device configured to be worn on a finger of a user comprising constructing an external housing that has an exterior surface, an internal surface, a first flange and a second flange, wherein the internal surface, the first flange, and the second flange at least partially define an internal space of the external housing. *See* '909 Patent, Cl. 1. The claimed method includes steps of inserting a curved battery, a printed circuit board, and one or more components into a curved perimeter of the internal space of the external housing and applying an internal potting to at least partially fill the internal space of the external housing and at least partially cover the curved battery and the printed circuit board, wherein at least a portion of the internal potting forms an interior surface that is

configured to contact the user's finger. *See id.* Further, the external housing and the internal plotting form a housing for the wearable ring device. *See id.* An exemplary configuration of a wearable ring device manufactured according to the claimed method is shown below in the excerpted Figures 12A, 12B, 12C, 13, 14A, 14D, and 14E of the '909 Patent.

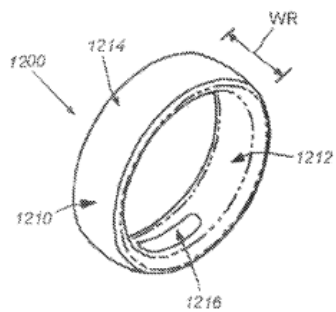


FIG. 12A

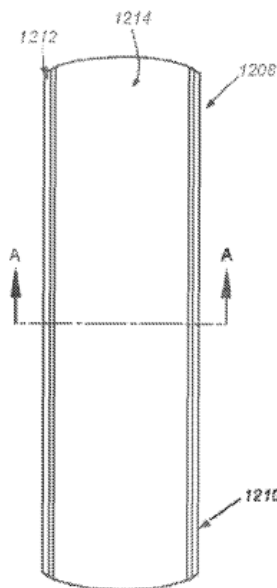


FIG. 12C

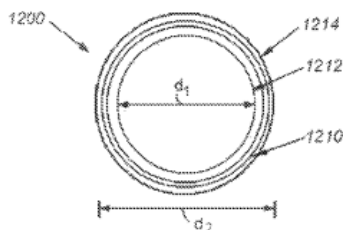


FIG. 12B

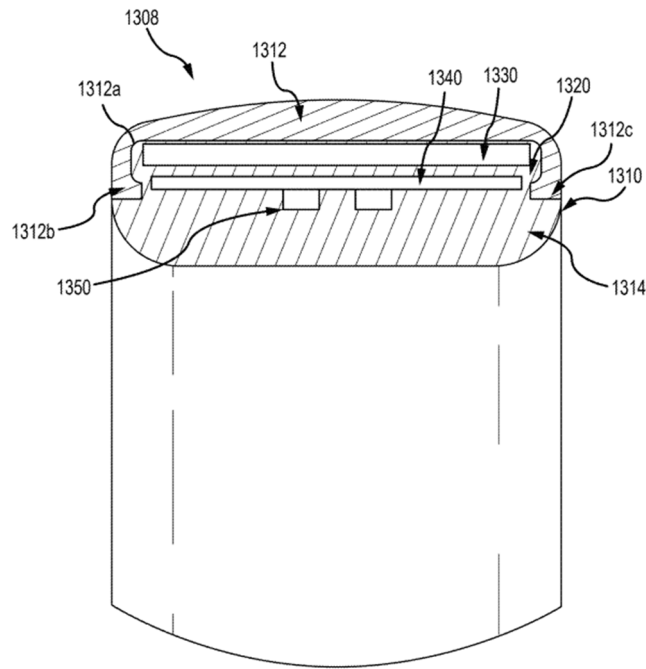


FIG.13

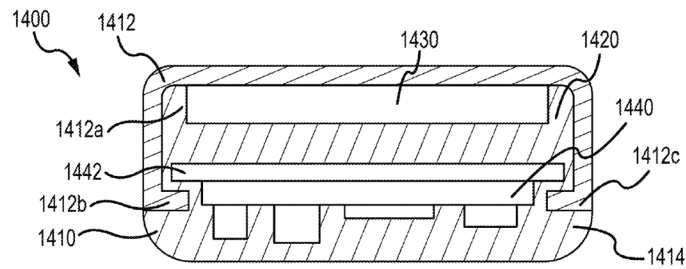


FIG.14A

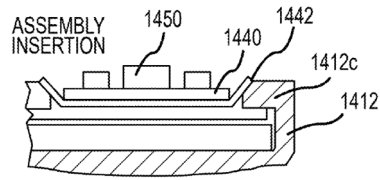


FIG. 14D

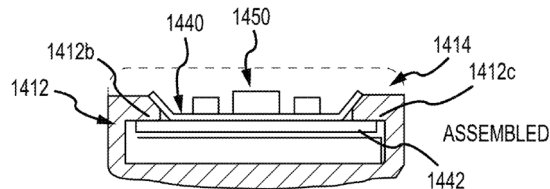


FIG. 14E

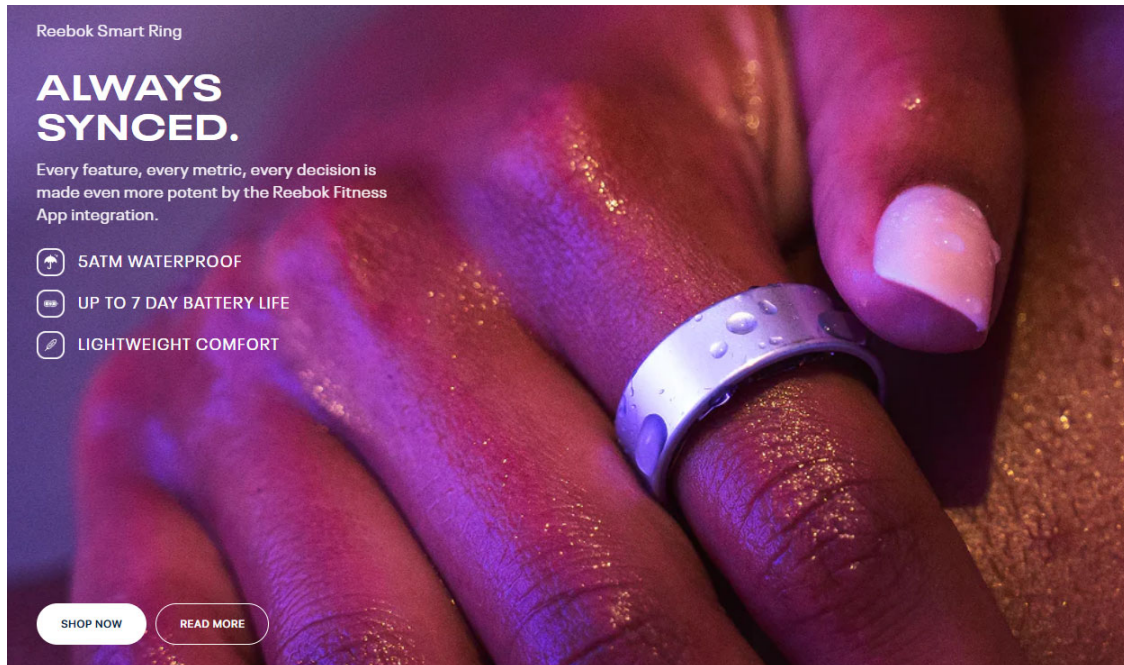
156. Defendants have directly infringed one or more claims of the '909 Patent in this District and elsewhere in Texas, including at least claim 1, literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling their smart ring technology, including at least Reebok-branded products having materially similar configurations to a wearable ring device.

157. For example, Defendants have literally and/or under the doctrine of equivalents directly infringed at least claim 1 of the '909 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling the Accused Product. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Oura reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the Accused Product is identified to describe Defendants' infringement and in no way limit the discovery and infringement allegations against Defendants concerning other devices that incorporate the same or reasonably similar functionalities.




158. The Accused Product includes a wearable ring device. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). For example, the Accused

Product, including the Reebok Smart Ring, possesses “an external housing,” “an exterior surface,” “an internal surface,” “a first flange,” “a second flange,” “internal potting,” “a curved battery,” “a printed circuit board,” and “one or more components.” as claimed in the ’909 Patent.

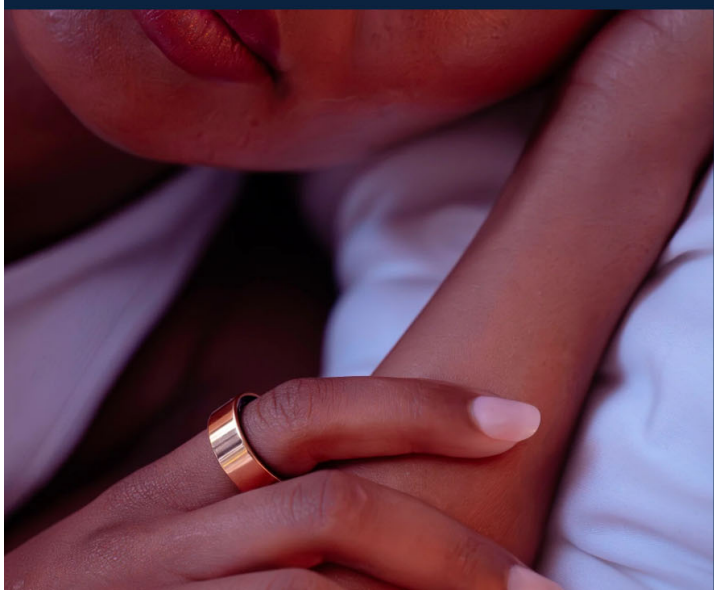
159. Similarly, the following excerpts from Defendants’ websites provide non-limiting examples of the Accused Product infringing at least claim 1 of the ’909 Patent:



## MOVEMENT IN MOTION

-  **ACTIVITY TRACKING**  
From walks to workouts, track your steps, distance, and calories throughout the day.
-  **EXERCISE MODE**  
Whether lifting, stretching, cycling, or sprinting, the ring adapts and syncs with the app to reflect your effort.
-  **ONE SCORE**  
Your daily green light, or your signal to slow down. This all-in-one score helps you understand when to push.



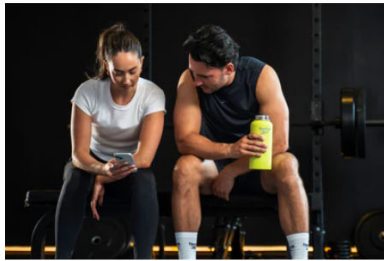


**BUILT FOR RECOVERY**

**SLEEP TRACKING**  
 Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed picture of how you're actually resting. Wake up to sleep scores and data-driven guidance for more informed training and smoother recovery.

**SKIN TEMPERATURE TREND**  
 Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts in your overnight baseline temperature that may point to early illness, hormonal changes, or signs of overtraining.

**STRESS MONITORING**  
 With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising stress levels. It doesn't just tell you when you're stressed, it guides you toward strategies that help.



**24/7 HEART RATE MONITORING**

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



**HRV (HEART RATE VARIABILITY)**

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



**SPO2 (BLOOD OXYGEN)**







Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.

<https://www.reeboksmartring.com/> (last visited November 13, 2025).





WHAT THE RING TRACKS ^

 Heart Rate	 HRV	 SPO2
 Steps	 Sleep Duration & Sleep Stages	 Stress

REEBOK FITNESS MEMBERSHIP ^

Every purchase of a Reebok Smart Ring comes with a 1 year free membership to over 1,000+ hours of fitness & wellness content in the Reebok Fitness App

## DESIGNED FOR LIFE.

### SLEEK, COMFORTABLE DESIGN

Crafted for durability and wearability, the ring is lightweight yet sturdy - designed to be worn during workouts, sleep, or daily movement.

### SIMPLE CHARGING + LONG BATTERY

A compact charging dock makes top-ups easy; most users can go several days between charges with normal use.

### INTEGRATED APP EXPERIENCE

All data feeds into the Reebok Fitness App, where you can view trends, set goals, join challenges, and access guided wellness content

## ACTIONABLE INSIGHTS.

### ALL-DAY BIOMETRIC TRACKING

Monitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.

### EFFORTLESS CONNECTIVITY & SYNC

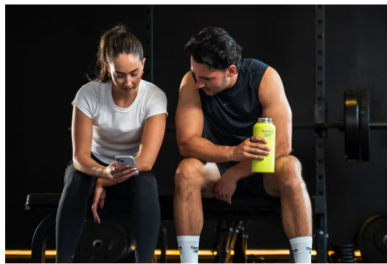
Bluetooth connection to the Reebok Fitness App ensures seamless data transfer.

### REAL-TIME PERFORMANCE & SLEEP INSIGHTS

Never accept a bad night's sleep again - with the Reebok Smart Ring, every minute is accounted for so you'll be informed about how you're sleeping.



The future of wellness



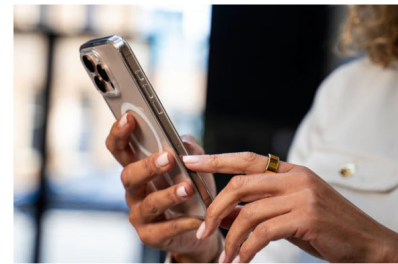
### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



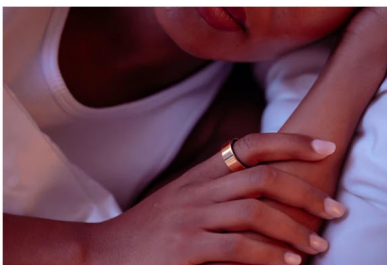
### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



### SPO2 (BLOOD OXYGEN)

Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.



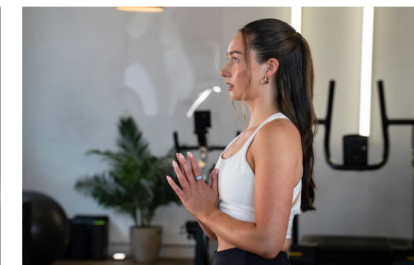
### SLEEP TRACKING

Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed.



### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts.



### STRESS MONITORING

With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising.

<https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025).

## HOW TO WEAR IT

To get the most accurate results from your Reebok Smart Ring:

1. Wear it on your index finger, preferably your non-dominant hand.
2. Ensure the sensor is facing your palm side.

*Top tip: stay still for a few moments during manual readings, like heart rate or SpO2.*

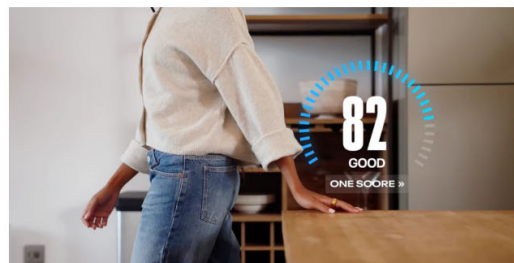


<https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025).

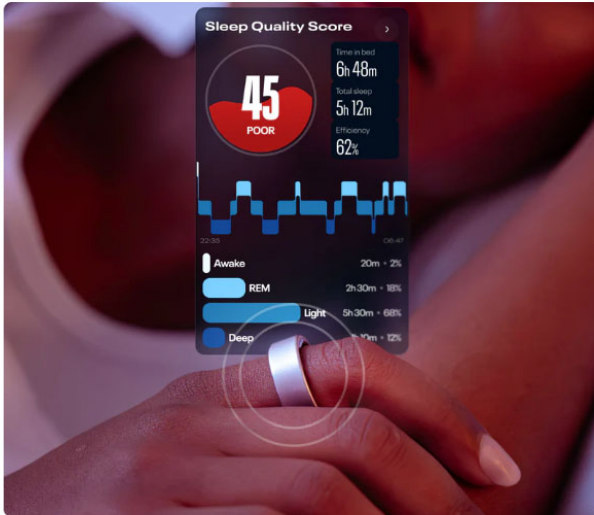


## UNDERSTANDING YOUR ONE SCORE

We've designed the score to stay simple and easy to understand. You don't need to dig into complicated data, just one clear number that shows how you're doing today. When one of these areas is out of balance, like missing your activity target, a restless night's sleep, or higher stress, your score may dip. That's not failure, it's a signpost, guiding you toward where to focus to feel better.



## HOW IT'S CALCULATED



### SLEEP QUALITY SCORE

#### EVERY MINUTE TRACKED

The most important part of your day can happen before you wake up. How you sleep, and the stages of sleep you enjoy, are a core contributor to how your One Score is calculated.

### ACTIVITY SCORE

#### THE DATA IN EVERY MOVEMENT

Whether you're stretching, walking, running or all of the above, every time you move you contribute to your health & fitness. All activity is captured by the Reebok Smart Ring and integrated in to your One Score so you have a clear picture of just how hard you're pushing it.





## STRESS & RECOVERY



### BODY & MIND

Leveraging a variety of data points including HRV, the One Score builds in a cross section of health & wellness variables to provide an informed insight in to how well your body is recovering from stress - whether that be physical, mental or both.



#### GOOD

you're doing really well across most areas. Anywhere north of 86 and you're in your sweet spot of recovery and activity

#### NORMAL

you're making progress, but there's room to improve. It's worth digging in to your metrics to find out where you can make positive changes to your day or night

#### POOR

one or more areas are off balance. Start small and focus on one thing today that can compound in to change over time

<https://www.reeboksmartring.com/pages/one-score> (last visited November 13, 2025).

## What sensors does the Reebok Smart Ring use?

### Accelerometer

- Function: Detects movement and orientation.
- Purpose: Activity tracking, step count, sleep movement detection.
- Example Use: Tracking daily activity levels and differentiating sleep stages.

### Heart Rate Sensor (PPG - Photoplethysmography)

- Function: To measure blood flow.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### SpO<sub>2</sub> Sensor (Pulse Oximeter)

- Function: Measures oxygen saturation in the blood.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### Skin Temperature Sensor

- Function: Detects changes in finger skin temperature.
- Purpose: Stress and recovery.

<https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

160. The foregoing features of the Accused Product and Defendants' description and/or demonstration thereof, including in user manuals and advertising, reflect Defendants' direct infringement by satisfying every element of at least claim 1 of the '909 Patent, under 35 U.S.C. § 271(a).

161. Similarly, on information and belief, Defendants import and/or sell within the United States after importation the Accused Product. For example, the product packaging for the

Accused Product indicates that the product is “Made in China,” “Supplied by Truconnect Ltd,” and imported into the United States thereafter:



162. Defendants are thereby liable for infringement of the '909 Patent pursuant to 35 U.S.C. § 271(g).

163. Defendants have indirectly infringed at least claim 1 of the '909 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use, offering for sale, selling, or importation of the Accused Product. On information and belief, Defendants purposefully causes their manufacturers through, for example, manufacturing agreements, to construct the Accused Product according to specifications provided by Defendants,

which is covered by the patented method. Further, on information and belief, Defendants direct their sales channel to sell the Accused Product in the United States and facilitates the sales in the United States by offering customers technical support, user guides, and limited warranties, for example. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://www.reeboksmartring.com/pages/terms-conditions> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/categories/29055239372317-Reebok-Smart-Ring> (last visited November 13, 2025). Such sales of the Accused Product in the United States directly infringe one or more claims of the '909 Patent in violation of 35 U.S.C. § 271.

164. Defendants are thereby liable for infringement of the '909 Patent pursuant to 35 U.S.C. § 271(b).

165. Defendants have been on notice of the '909 Patent since, at least, the filing of this Complaint. By the time of trial, Defendants will thus have known and intended that their continued actions would directly infringe and/or actively induce or contribute to actual infringement of at least claim 1 of the '909 Patent.

166. Defendants undertook and continued their infringing actions despite an objectively high likelihood that such activities infringed the '909 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this Complaint, Defendants have been aware of an objectively high likelihood that their actions constituted and continue to constitute infringement of the '909 Patent, and that the '909 Patent is valid. On information and belief, Defendants could not reasonably, subjectively believe that their actions do not constitute infringement of the '909 Patent, nor could they reasonably, subjectively believe that the patent is

invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants continued their infringing activities. As such, Defendants have willfully infringed and continues to willfully infringe the '909 Patent.

167. Oura has been and continues to be damaged by Defendants' infringement of the '909 Patent.

**COUNT 8 - INFRINGEMENT OF U.S. PATENT NO. 12,222,759**

168. Oura incorporates paragraphs 1-167 above by reference.

169. 32U.S. Patent No. 12,222,759 (the "'759 Patent," attached hereto at Exhibit 8) duly issued on February 11, 2025, and is entitled *Wearable Computing Device*.

170. Ouraring Inc. is the owner by assignment of the '759 Patent and possesses all rights under the '759 Patent, including the exclusive right to recover for past and future infringement.

171. The '759 Patent is directed to a wearable ring device including, for example, a wearable ring device configured to be worn on a finger of a user. In particular, the apparatus disclosed in the '759 Patent ensure that a user can track their physical movement, skin temperature, heart rate, and blood oxygenation levels from sensing data obtained from the wearable ring device.

172. Specifically, the '759 Patent discloses a wearable ring device including "a housing," "a curved battery," "a printed circuit board," and "a plurality of sensors," comprising "one or more light-emitting diode components," "one or more light-receiving components," and "a communication module" that all work in conjunction to provide a wearable smart ring device. *See* '759 Patent, Cl. 17. The housing has an interior and exterior surface and wherein at least a portion of the interior surface, the exterior surface, or both, is made of a metallic material. *See id.* Further, at least a portion of the interior surface is configured to contact a tissue of a user. A curved battery and a printed circuit board are disposed within the housing. *See id.* A plurality of sensors, comprising one or more light-emitting components, one or more light-receiving components, and

a communication module, are electrically coupled with the printed circuit board and the curved battery. *See id.* The plurality of sensors are configured to acquire data, such as physical activity, sleep, or health, from the user. *See id.* An exemplary configuration is shown below in the excerpted Figures 3B, 8, 12A, 12B, 12C, and 13 of the '759 Patent.

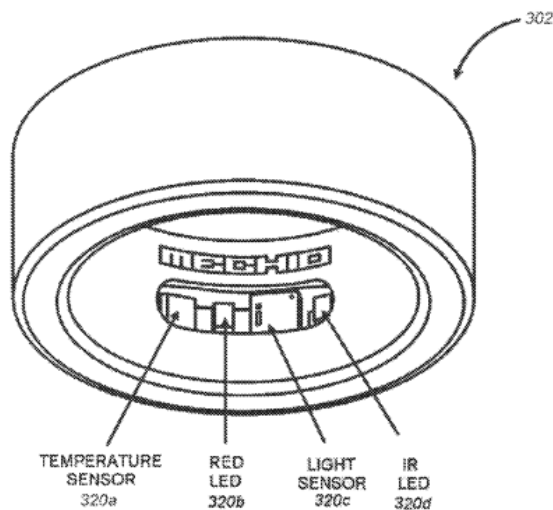


FIG. 3B

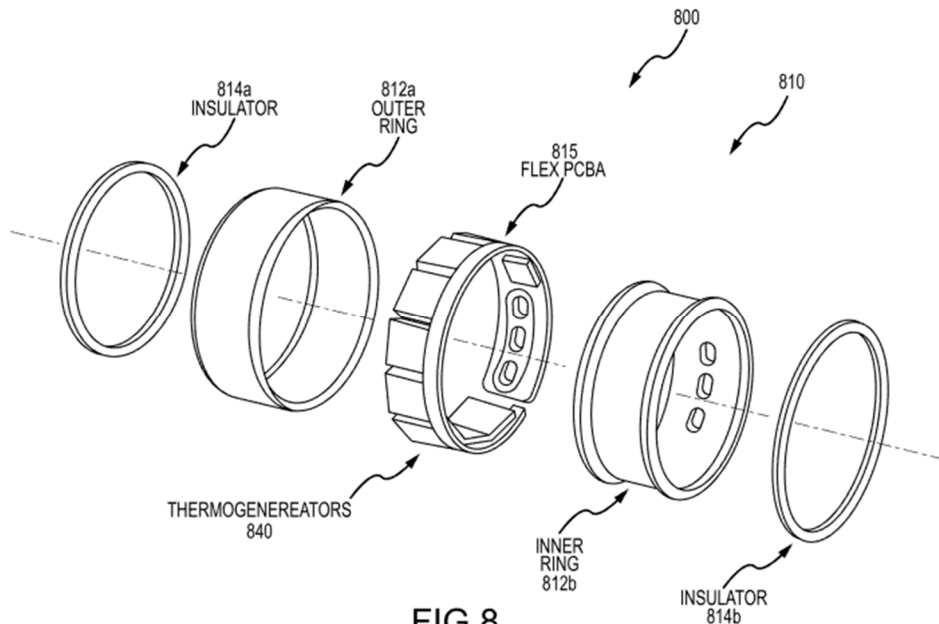


FIG. 8

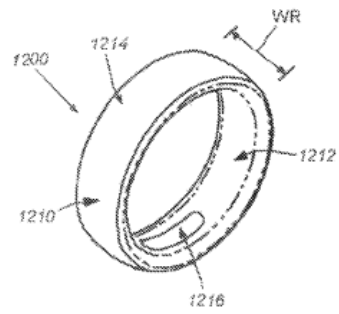


FIG. 12A

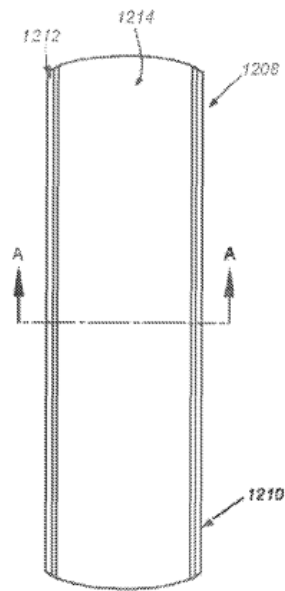


FIG. 12C

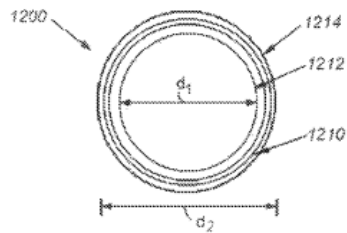


FIG. 12B

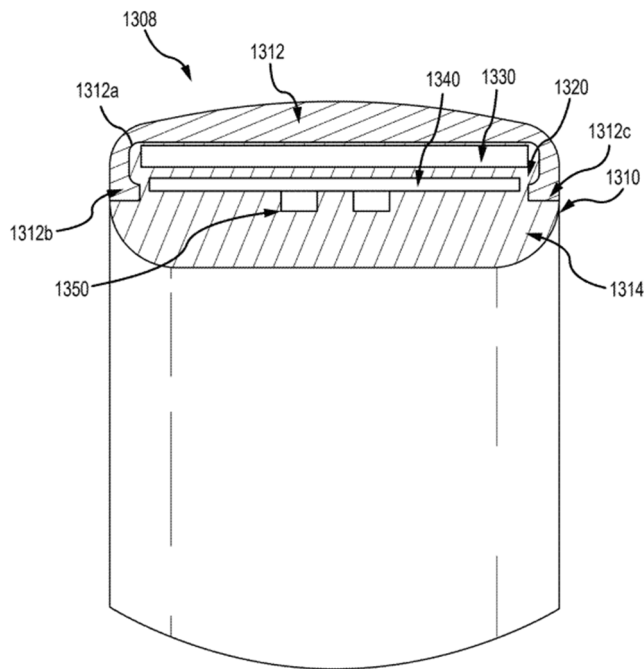


FIG. 13

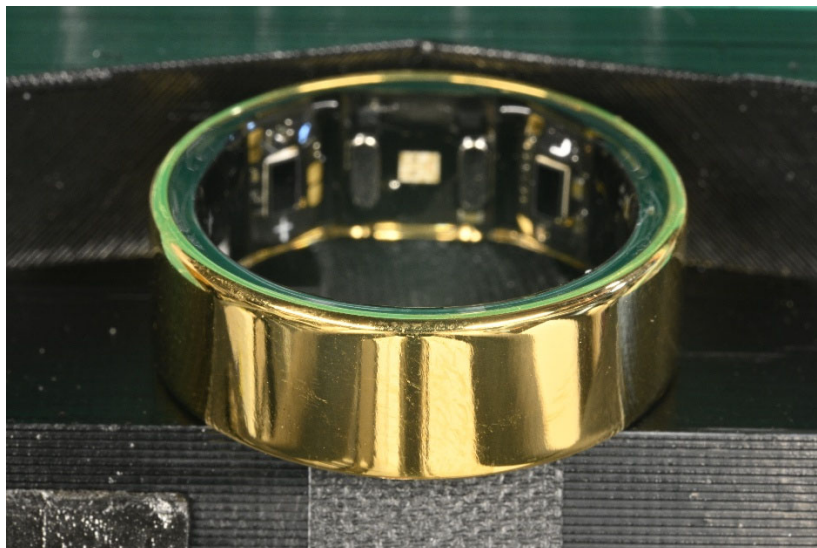
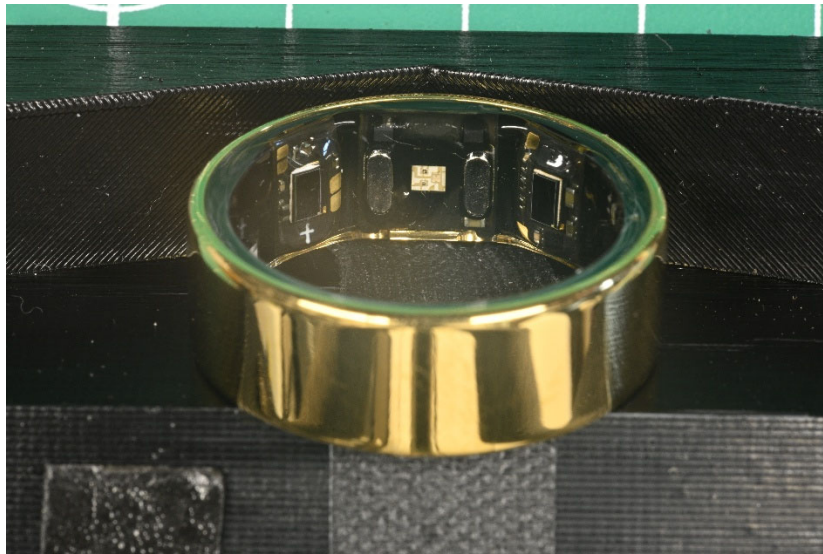
173. Defendants have directly infringed one or more claims of the '759 Patent in this District and elsewhere in Texas, including at least claim 17, literally and/or under the doctrine of equivalents, by or through making, using, importing, offering for sale and/or selling their smart ring technology, including at least Reebok-branded products having materially similar configurations to a wearable ring device.

174. For example, Defendants have literally and/or under the doctrine of equivalents directly infringed at least claim 17 of the '759 Patent in this District and elsewhere in Texas by or through making, using, importing, offering for sale and/or selling the Accused Products. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Oura reserves the right to discover and pursue any additional infringing devices that incorporate infringing functionalities. For the avoidance of doubt, the Accused Product is identified to describe Defendants' infringement and in no way limit the discovery and infringement allegations against Defendants concerning other devices that incorporate the same or reasonably similar functionalities.

175. The Accused Product is observed to be a finger-worn wearable ring device. For example, the Accused Product is observed to be a smart ring wearable device. The Accused Product is observed to include a housing including an interior surface and exterior surface where at least a portion of the interior surface, exterior surface, or both, comprise one or more metallic materials and at least a portion of the interior surface contacts a tissue of a user. For example, the Accused Product includes a titanium housing. The Accused Product is further observed to include a curved battery positioned within a curved portion of the housing and a printed circuit board at least partially within the housing. Additionally, the Accused Product is observed to include a plurality of sensors for acquiring data to monitor at least one physical activity, sleep, or health of the user that are electronically coupled with the printed circuit board and curved battery. For

example, the Accused Product includes an accelerometer, heart rate sensor (PPG – photoplethysmography), SpO<sub>2</sub> Sensor (pulse oximeter), and skin temperature sensor to acquire data from the user, such as the user’s blood oxygenation level, heart rate, temperature, and activity level. The Accused Product is further capable of monitoring a user’s sleep. For example, the Accused Product can provide users with various biometric data, including a user’s physical movement, temperature, heart rate, and blood oxygenation. Even further, the Accused Product is observed to include a communication module communicatively coupled to the plurality of sensors that can transmit the sensors’ data, analysis of the data generated by one or more processors, or both, to a user device. For example, the Accused Product is enabled with Bluetooth 5.1 to communicate the data and/or analysis of the data from the sensors, with a user device, such as a cell phone using the Reebok Fitness App. *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

176. As shown below, images of an exemplary Accused Product, including the Reebok Smart Ring, provide non-limiting examples of the Accused Product infringing at least claim 17 of the ’759 Patent by including “a housing,” “a curved battery,” “a printed circuit board,” and “a plurality of sensors,” comprising “one or more light-emitting diode components,” “one or more light-receiving components,” “one or more processors,” and “a communication module,” as claimed in the ’759 Patent:





177. Similarly, the following excerpts from Defendants' websites provide non-limiting examples of the Accused Product infringing at least claim 17 of the '759 Patent:

A screenshot of a Reebok Smart Ring advertisement. The background is a close-up of a hand wearing a silver smart ring. The text on the left side of the image reads: "Reebok Smart Ring", "ALWAYS SYNCED.", "Every feature, every metric, every decision is made even more potent by the Reebok Fitness App integration.", "5ATM WATERPROOF", "UP TO 7 DAY BATTERY LIFE", and "LIGHTWEIGHT COMFORT". At the bottom left, there are two buttons: "SHOP NOW" and "READ MORE".

## MOVEMENT IN MOTION

### ACTIVITY TRACKING

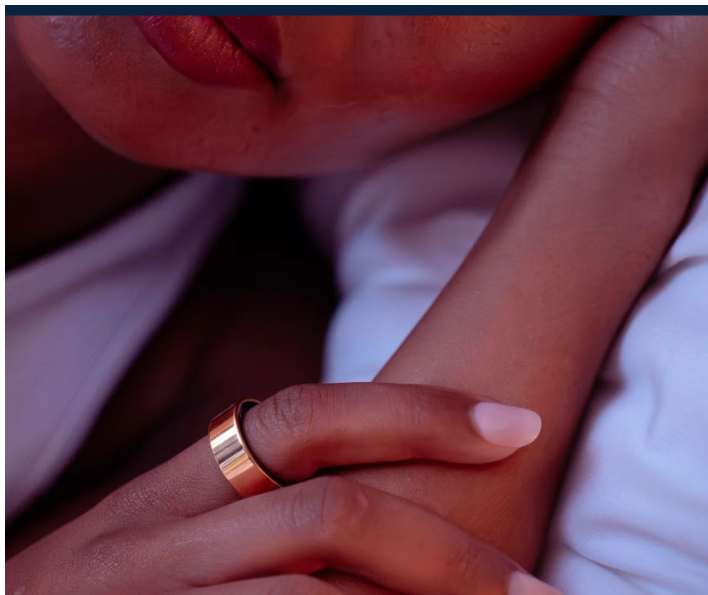
From walks to workouts, track your steps, distance, and calories throughout the day.

### EXERCISE MODE

Whether lifting, stretching, cycling, or sprinting; the ring adapts and syncs with the app to reflect your effort.

### ONE SCORE

Your daily green light, or your signal to slow down. This all-in-one score helps you understand when to push.



## BUILT FOR RECOVERY

### SLEEP TRACKING

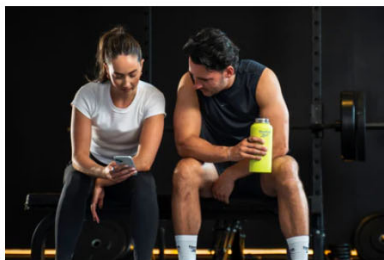
Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed picture of how you're actually resting. Wake up to sleep scores and data-driven guidance for more informed training and smoother recovery.

### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts in your overnight baseline temperature that may point to early illness, hormonal changes, or signs of overtraining.

### STRESS MONITORING

With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising stress levels. It doesn't just tell you when you're stressed, it guides you toward strategies that help.



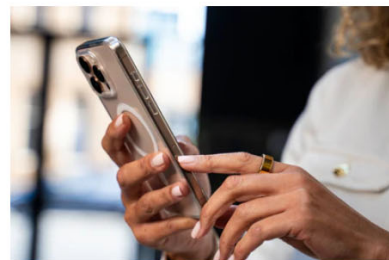
### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.









### SPO2 (BLOOD OXYGEN)

Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.

<https://www.reeboksmartring.com/> (last visited November 13, 2025).



**WHAT THE RING TRACKS** ^

 Heart Rate	 HRV	 SPO2
 Steps	 Sleep Duration & Sleep Stages	 Stress

**REEBOK FITNESS MEMBERSHIP** ^

Every purchase of a Reebok Smart Ring comes with a 1 year free membership to over 1,000+ hours of fitness & wellness content in the Reebok Fitness App

## DESIGNED FOR LIFE.

### SLEEK, COMFORTABLE DESIGN

Crafted for durability and wearability, the ring is lightweight yet sturdy - designed to be worn during workouts, sleep, or daily movement.

### SIMPLE CHARGING + LONG BATTERY

A compact charging dock makes top-ups easy; most users can go several days between charges with normal use.

### INTEGRATED APP EXPERIENCE

All data feeds into the Reebok Fitness App, where you can view trends, set goals, join challenges, and access guided wellness content

## ACTIONABLE INSIGHTS.

### ALL-DAY BIOMETRIC TRACKING

Monitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.

### EFFORTLESS CONNECTIVITY & SYNC

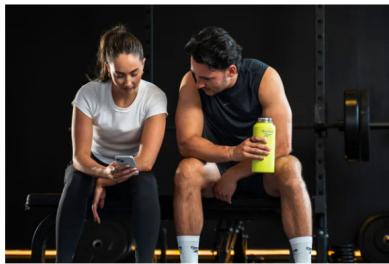
Bluetooth connection to the Reebok Fitness App ensures seamless data transfer.

### REAL-TIME PERFORMANCE & SLEEP INSIGHTS

Never accept a bad night's sleep again - with the Reebok Smart Ring, every minute is accounted for so you'll be informed about how you're sleeping.

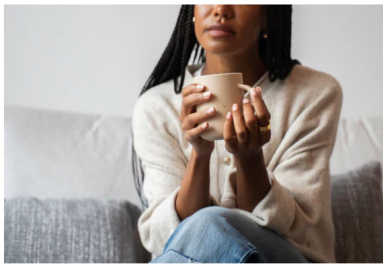


The future of wellness



#### 24/7 HEART RATE MONITORING

Get continuous heart rate insights, whether you're training, recovering, or sleeping.



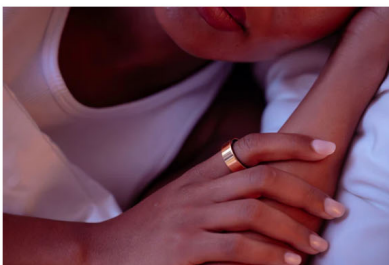
#### HRV (HEART RATE VARIABILITY)

HRV (Heart Rate Variability) This key metric reflects how well your body is prepared to handle stress, intensity, or recovery.



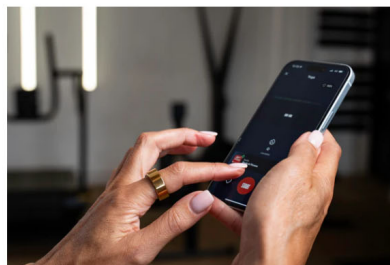
#### SPO2 (BLOOD OXYGEN)

Spot-check or monitor trends in blood oxygen saturation, ideal for catching fatigue early.



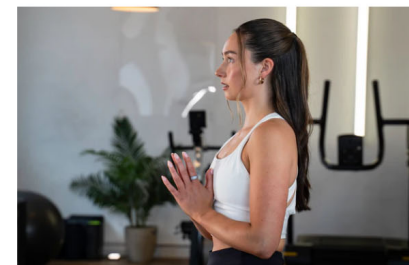
#### SLEEP TRACKING

Every phase of sleep, including light, deep, and REM, is tracked to provide a detailed.



#### SKIN TEMPERATURE TREND

Your body's internal signals, made visible while you sleep. The Reebok Smart Ring detects shifts.



#### STRESS MONITORING

With HRV and resting heart rate as anchors, the Reebok Smart Ring helps you stay ahead of rising.

<https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025).

## HOW TO WEAR IT

To get the most accurate results from your Reebok Smart Ring:

1. Wear it on your index finger, preferably your non-dominant hand.
2. Ensure the sensor is facing your palm side.

*Top tip: stay still for a few moments during manual readings, like heart rate or SpO2.*

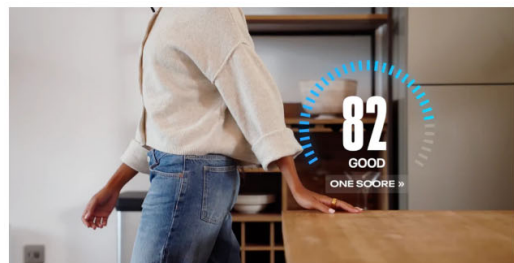


<https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025).

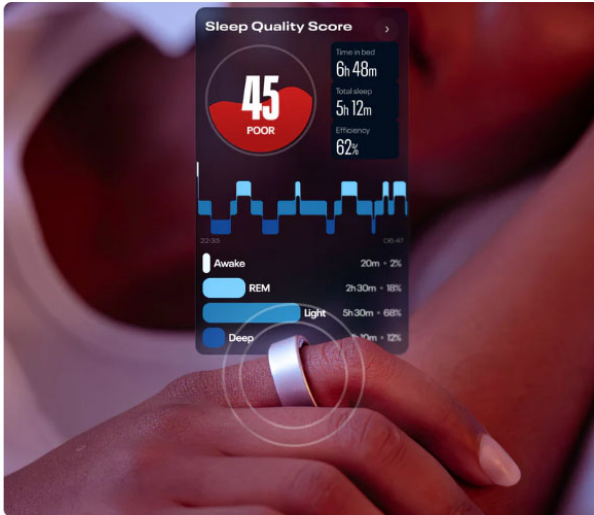


## UNDERSTANDING YOUR ONE SCORE

We've designed the score to stay simple and easy to understand. You don't need to dig into complicated data, just one clear number that shows how you're doing today. When one of these areas is out of balance, like missing your activity target, a restless night's sleep, or higher stress, your score may dip. That's not failure, it's a signpost, guiding you toward where to focus to feel better.



## HOW IT'S CALCULATED



### SLEEP QUALITY SCORE

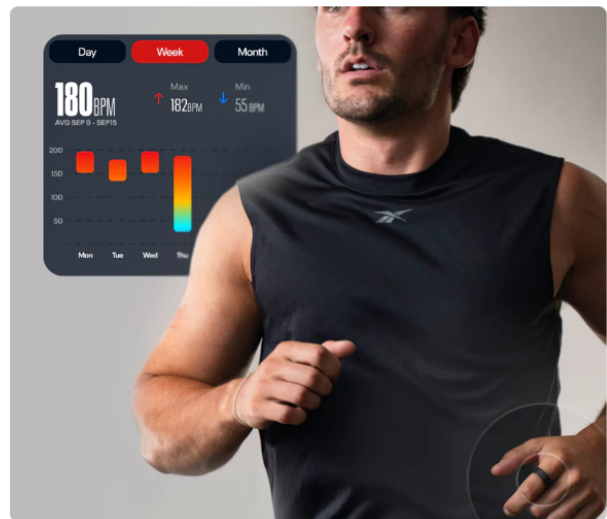
#### EVERY MINUTE TRACKED

The most important part of your day can happen before you wake up. How you sleep, and the stages of sleep you enjoy, are a core contributor to how your One Score is calculated.

### ACTIVITY SCORE

#### THE DATA IN EVERY MOVEMENT

Whether you're stretching, walking, running or all of the above, every time you move you contribute to your health & fitness. All activity is captured by the Reebok Smart Ring and integrated in to your One Score so you have a clear picture of just how hard you're pushing it.





## STRESS & RECOVERY



### BODY & MIND

Leveraging a variety of data points including HRV, the One Score builds in a cross section of health & wellness variables to provide an informed insight in to how well your body is recovering from stress - whether that be physical, mental or both.



#### GOOD

you're doing really well across most areas. Anywhere north of 86 and you're in your sweet spot of recovery and activity

#### NORMAL

you're making progress, but there's room to improve. It's worth digging in to your metrics to find out where you can make positive changes to your day or night

#### POOR

one or more areas are off balance. Start small and focus on one thing today that can compound in to change over time

<https://www.reeboksmartring.com/pages/one-score> (last visited November 13, 2025).

## What sensors does the Reebok Smart Ring use?

### Accelerometer

- Function: Detects movement and orientation.
- Purpose: Activity tracking, step count, sleep movement detection.
- Example Use: Tracking daily activity levels and differentiating sleep stages.

### Heart Rate Sensor (PPG - Photoplethysmography)

- Function: To measure blood flow.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### SpO<sub>2</sub> Sensor (Pulse Oximeter)

- Function: Measures oxygen saturation in the blood.
- Purpose: Continuous or periodic heart rate monitoring.
- Example Use: Fitness tracking, resting heart rate analysis.

### Skin Temperature Sensor

- Function: Detects changes in finger skin temperature.
- Purpose: Stress and recovery.

<https://help.reebokfitness.app/hc/en-gb/articles/30746628386973-What-sensors-does-the-Reebok-Smart-Ring-use> (last visited November 13, 2025).

178. The foregoing features of the Accused Product and Defendants' description and/or demonstration thereof, including in user manuals and advertising, reflect Defendants' direct infringement by satisfying every element of at least claim 17 of the '759 Patent, under 35 U.S.C. § 271(a).

179. Defendants have indirectly infringed at least claim 17 of the '759 Patent in this District and elsewhere in the United States by, among other things, actively inducing the use,

offering for sale, selling, or importation of the Accused Product. Defendants' customers who purchase devices and components thereof and operate such devices and components in accordance with Defendants' instructions directly infringe one or more claims of the '759 Patent in violation of 35 U.S.C. § 271. Defendants instruct their customers through at least user guides or websites, such as those located at: <https://www.reeboksmartring.com/> (last visited November 13, 2025); <https://www.reebok.com/products/reebok-reebok-smart-ring-shiny-gold?op1=Default%20Title&op2=&op3=> (last visited November 13, 2025); <https://help.reebokfitness.app/hc/en-gb/categories/29055239372317-Reebok-Smart-Ring> (last visited November 13, 2025).

180. For example, Defendants' website explains that users can “[m]onitor heart rate, sleep stages, activity metrics, and recovery status with accuracy - all from a discreet, water-resistant ring.” *See* <https://www.reeboksmartring.com/products/reebok-smart-ring> (last visited November 13, 2025). Defendants instruct their customers that “to get the most accurate results from your Reebok Smart Ring: 1. Wear it on your index finger, preferably your non-dominant hand. 2. Ensure the sensor is facing your palm side.” *See* <https://www.reeboksmartring.com/pages/ring-sizing-instructions> (last visited November 13, 2025). Further, Defendants state that “[b]uilt to integrate directly with the Ring, the Reebok Fitness App doesn't just house your data - it offers a library of fitness & wellness content for you to take action.” *See* <https://www.reeboksmartring.com/> (last visited November 13, 2025). Defendants also highlight the “activity tracking,” “exercise mode,” “one score,” “sleep tracking,” “skin temperature trend,” and “stress monitoring” features of the Reebok Smart Ring. *See id.*

181. Defendants are thereby liable for infringement of the '759 Patent pursuant to 35 U.S.C. § 271(b).

182. Defendants have indirectly infringed at least claim 17 of the '759 Patent, by, among other things, contributing to the direct infringement of others, including customers of the Accused Product by making, offering to sell, or selling, in the United States, or importing a component of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process, constituting a material part of the invention, knowing the same to be especially made or especially adapted for use in infringement of the '759 Patent, and not a staple article or commodity of commerce suitable for substantial non-infringing use.

183. For example, the Accused Product includes hardware and software for implementing health tracking functionality in a smart ring wearable, including a curved battery, housings, sensors, LEDs, and a printed circuit board. These are components of a patented machine, manufacture, or combination, or an apparatus for use in practicing a patented process. Furthermore, these components are a material part of the invention and upon information and belief are not a staple article or commodity of commerce suitable for substantial non-infringing use. Thus, Defendants are liable for infringement of the '759 Patent pursuant to 35 U.S.C. § 271(c).

184. Defendants have been on notice of the '759 Patent since, at least, the filing of this Complaint. By the time of trial, Defendants will thus have known and intended that their continued actions would directly infringe and/or actively induce or contribute to actual infringement of at least claim 1 of the '759 Patent.

185. Defendants undertook and continued their infringing actions despite an objectively high likelihood that such activities infringed the '759 Patent, which has been duly issued by the USPTO, and is presumed valid. For example, since at least the filing of this Complaint, Defendants have been aware of an objectively high likelihood that their actions constituted and continue to constitute infringement of the '759 Patent, and that the '759 Patent is valid. On information and

belief, Defendants could not reasonably, subjectively believe that their actions do not constitute infringement of the '759 Patent, nor could they reasonably, subjectively believe that the patent is invalid. Despite that knowledge and subjective belief, and the objectively high likelihood that their actions constitute infringement, Defendants continued their infringing activities. As such, Defendants have willfully infringed and continues to willfully infringe the '759 Patent.

186. Oura has been and continues to be damaged by Defendants' infringement of the '759 Patent.

### **PRAYER FOR RELIEF**

WHEREFORE, Oura prays for relief as follows:

- A. An adjudication that Defendants have infringed one or more claims of the '178, '244, '159, '227, '160, '889, '909, and '759 Patents, literally and/or under the doctrine of equivalents;
- B. An adjudication that Defendants have indirectly infringed one or more claims of the '178, '244, '159, '227, '160, '889, '909, and '759 Patents, literally and/or under the doctrine of equivalents;
- C. An award of damages to be paid by Defendants adequate to compensate Oura for Defendants' continuing or future infringement of the '178, '244, '159, '227, '160, '889, '909, and '759 Patents through the date such judgment is entered, including interest, costs, expenses, and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- D. An award related to any other equitable relief which may be requested and to which Oura is entitled;
- E. A declaration that this case is exceptional under 35 U.S.C. § 285;
- F. An award of Oura's reasonable attorneys' fees;

- G. A declaration that Defendants' acts of infringement were willful;
- H. An award of enhanced damages against Defendants pursuant to 35 U.S.C. § 284;
- and
- I. An award to Oura of such further relief at law or in equity as the Court deems just and proper.

**JURY TRIAL DEMANDED**

Oura hereby demands a trial by jury.

Dated: November 17, 2025

By: /s/ Jasjit S. Vidwan

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