

## **Alert** | Intellectual Property Litigation



August 2025

### ***PowerBlock Holdings, Inc. v. iFit, Inc.: A Rare Patent Eligibility Opinion***

The Federal Circuit’s recent decision in *PowerBlock Holdings, Inc. v. iFit, Inc.*, No. 2024-1177 (Fed. Cir. Aug. 11, 2025), a rare opinion finding challenged claims eligible, offers new guidance on the boundaries of patent eligibility under 35 U.S.C. § 101. While the case centers on selectorized dumbbells—a mechanical invention—the court’s reasoning provides valuable lessons for patent practitioners, particularly those drafting claims for AI and software-based inventions. This GT Alert summarizes the facts and holding of the case and offers practical considerations for navigating § 101 challenges.

#### **Case Summary: Facts and Procedural History**

PowerBlock Holdings, Inc. sued iFit, Inc. in the District of Utah, alleging infringement of U.S. Patent No. 7,578,771 and violation of Utah’s Unfair Competition Act. The ‘771 patent relates to selectorized dumbbells—exercise equipment allowing users to adjust the weight by selecting different numbers of nested weight plates. The patent claims an integrated system for automating the selection and adjustment of dumbbell weights, addressing safety and convenience issues inherent in the prior art.

iFit moved to dismiss under Rule 12(b)(6), arguing that all but one claim of the ‘771 patent were ineligible under § 101 as directed to an abstract idea. The district court agreed, holding that claims 1-18 and 20 were “directed to an abstract idea and implemented using generic components,” and thus failed both steps of the Supreme Court’s *Alice* test for patent eligibility. Only claim 19 survived, as it recited a means for weight adjustment without user contact, and the parties did not meaningfully argue its eligibility.

PowerBlock appealed the dismissal of claims 1-18 and 20. The Federal Circuit reversed, holding that these claims are not directed to an abstract idea and are patent-eligible under § 101.

### **Federal Circuit's Analysis and Holding**

#### *Alice Step One: Not an Abstract Idea*

The Federal Circuit's analysis focused on *Alice* step one: whether the claims are “directed to” an abstract idea. The district court had characterized the claims as covering the general concept of automated weight stacking, implemented with generic components. The Federal Circuit disagreed, emphasizing that claim 1 is limited to a specific type of dumbbell—a selectorized dumbbell with nested weight plates, a handle, a movable selector, and an electric motor operatively connected to the selector. The motor physically moves the selector to adjust the weight, as chosen by the user.

The court found that these limitations provided “enough specificity and structure to satisfy § 101,” distinguishing the claims from those in prior cases where the claims merely automated known techniques without meaningful limitations. The court cautioned against “oversimplifying the claims” and ignoring specific requirements, even if some elements are conventional.

#### *Alice Step Two: No Need to Proceed*

Because the claims were not directed to an abstract idea, the court did not reach *Alice* step two (whether the claims contain an “inventive concept” sufficient to transform the abstract idea into patent-eligible subject matter).

The Federal Circuit thus reversed the district court's finding of ineligibility and remanded for further proceedings, holding that claims 1-18 and 20 are patent-eligible. The court also cautioned against conflating § 101 eligibility with novelty and obviousness inquiries under §§ 102 and 103.

### **Practical Considerations for Patent Practitioners Post-PowerBlock**

While *PowerBlock* involved a mechanical invention, its reasoning may still be instructive for practitioners drafting claims for AI and software-based inventions, which frequently face § 101 challenges.

When drafting AI related patents, practitioners may wish to include claims that recite specific structural or procedural limitations, not just a desired result or function. They should consider avoiding claims with broad concepts such as “automated decision-making” or “data analysis.” Instead, practitioners might specify the particular steps, data structures, or system components involved in the process. For example, detail how the AI model is trained, the architecture used, the data flow, and how outputs are generated and used.

When drafting claims, practitioners may find it useful to describe the combination of elements in a way that highlights the technical improvement over the prior art. If the invention uses known machine learning techniques, explaining how their combination or application to a specific problem is new and provides a technical benefit may strengthen the application. Some AI inventions use standard hardware (servers, processors) and known algorithms. Applicants might consider focusing on how the invention integrates these components to solve a technical problem in a new way. For example, claims might recite a specific arrangement of neural network layers, a novel data preprocessing method, or a unique feedback mechanism.

Claims that merely automate a known process using generic computer components may be ineligible, so applicants might benefit from articulating how the AI invention goes beyond mere automation. For example, they might describe how the AI model adapts in real-time, interacts with physical devices, or improves the functioning of a computer or network.

If faced with a § 101 rejection at the USPTO, practitioners may wish to urge the examiner against dissecting claims into old and new elements for § 101 analysis. It may be helpful to emphasize the claim as a whole and its technical contribution, rather than arguing individual elements in isolation.

## Conclusion

*PowerBlock Holdings, Inc. v. iFit, Inc.* reaffirms that claims reciting specific structural or procedural limitations—even if some elements are conventional—may be patent-eligible under § 101. For AI and software patent practitioners, the case underscores the importance of drafting claims that specify how the invention achieves a technical improvement, rather than merely claiming a desired result. Focusing on claim specificity, integration of components, and technical benefits may help practitioners better navigate the evolving landscape of patent eligibility for AI and software inventions.

## Author

This GT Alert was prepared by:

- **James J. DeCarlo** ‡ | +1 212.801.6729 | [decarloj@gtlaw.com](mailto:decarloj@gtlaw.com)

‡ Admitted in New Jersey and New York and before the USPTO. Not admitted in Florida.

Albany. Amsterdam. Atlanta. Austin. Berlin<sup>~</sup>. Boston. Charlotte. Chicago. Dallas. Delaware. Denver. Fort Lauderdale. Houston. Kingdom of Saudi Arabia<sup>•</sup>. Las Vegas. London<sup>\*</sup>. Long Island. Los Angeles. Mexico City<sup>+</sup>. Miami. Milan<sup>\*</sup>. Minneapolis. Munich<sup>~</sup>. New Jersey. New York. Northern Virginia. Orange County. Orlando. Philadelphia. Phoenix. Portland. Sacramento. Salt Lake City. San Diego. San Francisco. São Paulo<sup>»</sup>. Seoul<sup>•</sup>. Shanghai. Silicon Valley. Singapore<sup>•</sup>. Tallahassee. Tampa. Tel Aviv<sup>^</sup>. Tokyo<sup>•</sup>. United Arab Emirates<sup><</sup>. Warsaw<sup>~</sup>. Washington, D.C. West Palm Beach. Westchester County.

*This Greenberg Traurig Alert is issued for informational purposes only and is not intended to be construed or used as general legal advice nor as a solicitation of any type. Please contact the author(s) or your Greenberg Traurig contact if you have questions regarding the currency of this information. The hiring of a lawyer is an important decision. Before you decide, ask for written information about the lawyer's legal qualifications and experience. Greenberg Traurig is a service mark and trade name of Greenberg Traurig, LLP and Greenberg Traurig, P.A. ~Greenberg Traurig's Berlin and Munich offices are operated by Greenberg Traurig Germany, LLP, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. \*Operates as a separate UK registered legal entity. «Greenberg Traurig operates in the Kingdom of Saudi Arabia through Greenberg Traurig Khalid Al-Thebity Law Firm, a professional limited liability company, licensed to practice law by the Ministry of Justice. +Greenberg Traurig's Mexico City office is operated by Greenberg Traurig, S.C., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. »Greenberg Traurig's Milan office is operated by Greenberg Traurig Studio Legal Associato, an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ›Greenberg Traurig's São Paulo office is operated by Greenberg Traurig Brazil Consultores em Direito Estrangeiro – Direito Estadunidense, incorporated in Brazil as a foreign legal consulting firm. Attorneys in the São Paulo office do not practice Brazilian law. «Operates as Greenberg Traurig LLP Foreign Legal Consultant Office. ~Greenberg Traurig's Singapore office is operated by Greenberg Traurig Singapore LLP which is licensed as a foreign law practice in Singapore. ^Greenberg Traurig's Tel Aviv office is a branch of Greenberg Traurig, P.A., Florida, USA. ¢Greenberg Traurig's Tokyo Office is operated by GT Tokyo Horitsu Jimusho and Greenberg Traurig Gaikokuhojimubengoshi Jimusho, affiliates of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. ‹Greenberg Traurig's United Arab Emirates office is operated by Greenberg Traurig Limited. ~Greenberg Traurig's Warsaw office is operated by GREENBERG TRAUIG Nowakowska-Zimoch Wysocki sp.k., an affiliate of Greenberg Traurig, P.A. and Greenberg Traurig, LLP. Certain partners in GREENBERG TRAUIG Nowakowska-Zimoch Wysocki sp.k. are also shareholders in Greenberg Traurig, P.A. Images in this advertisement do not depict Greenberg Traurig attorneys, clients, staff or facilities. No aspect of this advertisement has been approved by the Supreme Court of New Jersey. ©2025 Greenberg Traurig, LLP. All rights reserved.*