

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PHILIPS NORTH AMERICA LLC,

Plaintiff,

v.

FITBIT, INC.,

Defendant.

Civil Action No. 1:19-cv-11586-FDS

**PLAINTIFF'S STATEMENT OF FACTS IN SUPPORT OF ITS
MOTION FOR PARTIAL SUMMARY JUDGMENT OF DIRECT
INFRINGEMENT AND NO INVALIDITY ON iFIT PRIOR ART**

FILED UNDER SEAL