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UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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SMITH & NEPHEW INC., WRIGHT MEDICAL GROUP, INC. AND WRIGHT  
MEDICAL TECHNOLOGY, INC.  
Petitioners

v.

BONUTTI SKELETAL INNOVATIONS, LLC  
Patent Owner of U.S. Patent No. 7,806,896 to Peter M. Bonutti

IPR Trial No. IPR2013-00629, Consolidated

**PETITIONERS' DEMONSTRATIVE EXHIBITS FOR ORAL ARGUMENT**

**Smith & Nephew, Inc.,  
Wright Medical Group, Inc., and  
Wright Medical Technology, Inc.,  
Petitioners**

**v.**

**Bonutti Skeletal Innovations LLC,  
Patent Owner of U.S. Patent No. 7,806,896  
IPR Trial No. IPR2013-00629**

**PETITIONERS' ORAL ARGUMENT**

**CLAIM 1 OF U.S. PATENT NO. 7,806,896**

# Overview

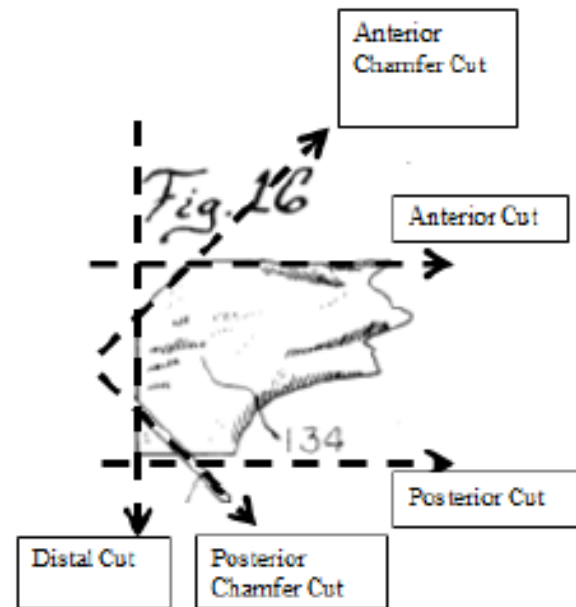
- Overview of Applied Prior Art & Obviousness of Claim 1
- Issues Raised by Patent Owner
  - Whether the Scorpio reference discloses the “transverse dimension” limitation (regardless, Patent Owner does not dispute the Turner reference discloses this limitation)
  - Whether the references would have been combined

# The Technology



**Illustration of Components of Human Knee**

(Mabrey Decl. ¶ 23 (EX. 1002))



**Illustrations of Knee Resection Cuts**

(Pet. at 11)

# The Challenged Claim – Claim 1

1. A method of replacing at least a portion of a patient's knee, the method comprising the steps of:
  - making an incision in a knee portion of a leg of the patient;
  - determining a position of a cutting guide using references derived independently from an intramedullary device;
  - positioning a cutting guide using the determined position, passing the cutting guide through the incision and on a surface of a distal end portion of an unresected femur, the cutting guide secured to the bone free of an extramedullary or intramedullary alignment rod;
  - moving a cutting tool through the incision into engagement with a guide surface on the cutting guide; and
  - forming at least an initial cut on the femur by moving the cutting tool along the guide surface;
  - attaching a replacement portion of the knee to the cut surface, the replacement portion having a transverse dimension that is larger than a transverse dimension of the guide surface.

*'896 at Claim 1*

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