

Exhibit 1002

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO: 1:14-CV-61263-DPG/WCT

MAKO SURGICAL CORP.,
a Delaware corporation,
ALL-OF-INNOVATION GMBH,
a German corporation,

Plaintiffs,

vs.

BLUE BELT TECHNOLOGIES, INC.,
a Pennsylvania corporation,

Defendant.

**DEFENDANT BLUE BELT TECHNOLOGIES, INC.'S SECOND AMENDED ANSWER
TO PLAINTIFFS' MAKO SURGICAL CORP. & ALL-OF-INNOVATION GMBH
COMPLAINT; AFFIRMATIVE DEFENSES AND COUNTERCLAIMS**

Defendant Blue Belt Technologies, Inc. ("Blue Belt"), for itself and no other party, answers as follows in response to the corresponding numbered paragraphs in Plaintiff Mako Surgical Corp.'s ("Mako") and All-of-Innovation GmbH's ("AOI") (collectively, "Plaintiffs") Complaint, dated May 30, 2014:

AS TO "PARTIES"

1. Blue Belt lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 1 of the Complaint and on that basis denies the same.

2. Blue Belt lacks knowledge or information sufficient to form a belief about the truth of the allegations of Paragraph 2 of the Complaint and on that basis denies the same.

3. Blue Belt admits that it is a corporation organized and existing under the laws of the State of Pennsylvania, with a principal place of business at 2905 Northwest Boulevard, Suite 40, Plymouth, Minnesota 55441.

AS TO “JURISDICTION AND VENUE”

4. Blue Belt admits that Mako purports to bring an action for patent infringement under 35 U.S.C. § 271 *et seq.* and that subject matter jurisdiction of Plaintiffs’ patent infringement claim is proper in this Court pursuant to 28 U.S.C. §§ 1331 and 1338, but Blue Belt denies that any Plaintiffs are entitled to any relief relating thereto. Except as expressly admitted, Blue Belt denies the allegations of Paragraph 4 of the Complaint.

5. Blue Belt admits that that this Court has personal jurisdiction over Blue Belt in this matter. Except as expressly admitted, Blue Belt denies the allegations of Paragraph 5 of the Complaint.

6. Blue Belt denies the allegations of Paragraph 6 of the Complaint.

7. Blue Belt admits that the Southern District of Florida is a suitable venue for Plaintiffs’ patent infringement claim against Blue Belt. Except as expressly admitted, Blue Belt denies the allegations of Paragraph 7 of the Complaint.

AS TO “BACKGROUND”

8. Blue Belt admits that Mako markets a product and/or service called “MAKOplasty,” used with respect to knee and hip arthroplasty; Blue Belt denies the remaining allegations of Paragraph 8 of the Complaint.

9. Blue Belt lacks knowledge or information sufficient to form a belief about the truth as to the date Mako was founded or as to the number of U.S. and foreign patents and patent applications Mako has, and on that basis denies said allegations; Blue Belt denies the remaining allegations in Paragraph 9 of the Complaint.

10. Blue Belt admits that Mako markets products and/or services called “MAKOplasty,” the RIO Robotic Arm Interactive Orthopedic device, and Restoris implants in the United States. Blue Belt lacks knowledge or information sufficient to form a belief about the truth as to the all the specific location(s) in which these products and/or services are offered or specifically how many procedures have been performed, and denies these allegations on this basis. Blue Belt denies the remaining allegations of Paragraph 10 of the Complaint.

11. Blue Belt lacks knowledge or information sufficient to form a belief about the truth as to purported rankings or honors regarding Mako and/or its products and/or services, and denies these allegations on this basis. Blue Belt denies the remaining allegations of Paragraph 11 of the Complaint.

12. Blue Belt denies the allegations of Paragraph 12 of the Complaint.

13. Blue Belt admits that Mako’s products and/or services are sold and/or offered for sale in the United States; Blue Belt lacks knowledge or information sufficient to form a belief about the truth as to the remaining allegations of Paragraph 13 of the Complaint, and denies these allegations on this basis.

14. Blue Belt lacks knowledge or information sufficient to form a belief about the truth as to purported rankings or honors regarding Tim Lüth and denies these allegations on this basis; Blue Belt denies the remaining allegations of Paragraph 14 of the Complaint.

15. Blue Belt admits that on December 10, 2012, Blue Belt issued a press release announcing that it received clearance from the Food and Drug Administration (“FDA”) to market its NavioPFS® orthopedic surgical system in the United States, and that NavioPFS® was approved at that time for use in Unicondylar Knee Replacement (“UKR”); Blue Belt denies the remaining allegations of Paragraph 15 of the Complaint.

16. Blue Belt admits that its 510(k) Summary to FDA describes the NavioPFS® as “a computer-assisted orthopedic surgical navigation and surgical burring system.” Blue Belt admits that the same document states that the NavioPFS® “uses established technologies of navigation via a passive infrared tracking camera to aid the surgeon in establishing a bone surface model for the target surgery and to plan the surgical implant location based on predefined bone landmarks and known configuration of the surgical implant”; and that it further states that the system “aids the surgeon in executing the surgical plan by using a standard off-the-shelf surgical drill motor and bur . . . which has been adapted using a tracking system.” Blue Belt admits that the same document further states that the NavioPFS® “software controls the position of the tip of the surgical bur relative to the end of a guard attached to the handpiece,” and notes that “[a]s the planned surface is reached the tip of the bur is fully retracted within the guard.” Blue Belt admits that the same document states that “[a]n alternative mode of operation is speed control mode,” in which “the speed of the bur is controlled and the bur stops as the planned surface is reached.” Blue Belt denies the remaining allegations of paragraph 16 of the Complaint.

17. Paragraph 17 of the Complaint purports to quote statements by Blue Belt without offering a source for those statements. Consequently, Blue Belt lacks knowledge or information sufficient to form a belief about the truth as to the allegations of Paragraph 17 of the Complaint, and denies these allegations on this basis.

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