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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

BOSTON SCIENTIFIC CORPORATION
and
BOSTON SCIENTIFIC SCIMED, INC.

Plaintiffs,

v.

EDWARDS LIFESCIENCES
CORPORATION,

Defendant.

Case No. 8:16-cv-0730-CJC-GJS

**BOSTON SCIENTIFIC
CORPORATION'S AND BOSTON
SCIENTIFIC SCIMED, INC.'S
SUPPLEMENTAL OBJECTIONS
AND RESPONSES TO
EDWARDS'S INTERROGATORY
NOS. 1-16**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Boston Scientific Corporation and Boston Scientific Scimed, Inc. (collectively, "Boston Scientific") hereby serves these supplemental objections and response to Interrogatory Nos. 1-16 served by Edwards Lifesciences Corporation ("Edwards").

**Edwards Lifesciences v. Boston Scientific
U.S. Patent No. 6,915,560**

PLA

NOS. 1-16

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Table I Asserted Claims Of The Patents-In-Suit

Patents-In-Suit	Asserted Claims
6,007,543 (the '543 patent) (Ex. A)	1-3, 6-12, 19-21, 24-29
6,203,558 (the '558 patent) (Ex. B)	1-2, 9, 14, 20-22
6,371,962 (the '962 patent) (Ex. C)	1-3, 6-13, 20-22, 25-30, 35-36
6,712,827 (the '827 patent) (Ex. D)	1-3, 5-20
6,915,560 (the '560 patent) (Ex. E)	1-2, 6, 8-11, 14-15, 17-19, 23, 25-28, 31, 33-35, 37, 40
7,749,234 (the '234 patent) (Ex. F)	1-3, 5-8, 13, 15, 18-20
7,828,767 (the '767 patent) (Ex. G)	5-6, 9-12
8,709,062 (the '062 patent) (Ex. H)	1-26

Table II Accused Products, Their Exemplary Models/Version, And Asserted Claims

Accused Products	Exemplary Models/Versions	Asserted Claims
Commander Delivery System	9600LDS20, 9600LDS23, 9600LDS26, 9600LDS29, 9610TF23, 9610TF26, 9610TF29	'543 patent: 1-2, 6-8, 11-12, 19-20, 24-25, 28-29 '558 patent: 1-2, 9, 14, 20-22 '962 patent: 1-2, 6-8, 11-13, 20-21, 25-26, 29-30, 35-36 '827 patent: 1-2, 5-14, 16-18, 20 '234 patent: 1-3, 5-8, 13, 15, 18-20 '767 patent: 5-6, 9-12 '062 patent: 1-26
Ascendra Delivery System (or Balloon Catheter)	Ascendra+: 9355AS23, 9355AS26, 9355AS29 Ascendra: 9120BCL23, 9120BCL26, 9100BCL23, 9100BCL26	'962 patent: 1-3, 8, 11-13, 20-22, 29-30, 35-36 '827 patent: 1-3, 13-14, 16-20 '767 patent: 5-6, 9-12 '062 patent: 1-12
Certitude Delivery	9620TA23, 9620TA26,	'543 patent: 1-3, 8-12, 19-21, 26-

System	9620TA29	29 '962 patent: 1-3, 8-13, 20-22, 27-30, 35-36 '827 patent: 1-3, 13-20 '767 patent: 5-6, 9-12 '062 patent: 1-12
NovaFlex Delivery System	NovaFlex+: 9355FS20, 9355FS23, 9355FS26, 9355FS29 NovaFlex: 9350FS23, 9350FS26	'543 patent: 1-3, 8, 11-12, 19-21, 28-29 '962 patent: 1-3, 8, 11-13, 20-22, 29-30, 35-36 '827 patent: 1-3, 13-14, 16-20 '767 patent: 5-6, 9-12 '062 patent: 1-12
RetroFlex Delivery System (or Balloon Catheter)	RetroFlex 3: 9120FS23, 9120FS26 RetroFlex II: 9100HDSLT23, 9100HDSLT26 RetroFlex: 9120BC20, 9120BC23	'543 patent: 1-3, 8, 11-12, 19-21, 28-29 '962 patent: 1-3, 8, 11-13, 20-22, 29-30, 35-36 '827 patent: 1-3, 13-14, 16-20 '767 patent: 5-6, 9-12 '062 patent: 1-12
Edwards Crimper	9100CR23, 9100CR26, 9340CR23, 9340CR26, 9350CR, 9600CR	'560 patent: 1-2, 6, 8-11, 14-15, 17-19, 23, 25-28, 31, 33-35, 37, 40

The claim charts attached herein as Exhibits A-H identify where each limitation of the asserted claims of the Patents-In-Suit is found within one or more accused products. Boston Scientific contends that each element of each asserted claim is literally present in the accused products unless otherwise indicated. But to

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