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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NEVRO CORP.
Petitioner,

v.

BOSTON SCIENTIFIC NEUROMODULATION CORP.
Patent Owner

Inter Partes Review No. 2018-00148
U.S. Patent No. 8,646,172

PATENT OWNER'S PRELIMINARY RESPONSE

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VII. GROUND 1: THE COMBINATION OF STOLZ, ORMSBY, AND BLACK DOES NOT RENDER OBVIOUS CLAIMS 1-11 23

 A. Claims 1 and 6: Neither Stolz, Ormsby, nor Black Disclose, Teach, or Suggest “Placing Non-Conductive Material Into a Portion of at Least one of the Conductor Lumens of the Lead Body, Wherein at Least a Portion of the Non-Conductive Material is Disposed Radially Beneath the Conductive Contacts” .. 23

 1. Stolz..... 24

 2. Black..... 26

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 B. Claim 6: Neither Stolz, Black, Ormsby, nor Modern Plastics Encyclopedia Disclose, Teach or Suggest the Step of “Heating the Nonconductive Material at a Temperature in a Range of 140 to 250 Degrees Celsius for a Period in a Range of

15 to 120 Seconds to Cause the Non-Conductive Material to Thermally Reflow or Melt”.....29

1. Stolz, Black and Ormsby do not disclose, teach or suggest the heating step. 30

2. The Modern Plastics Encyclopedia and Cartmell do not disclose, teach or suggest the specific recited parameters for the heating step.....30

C. Claims 2-5 and 7-11: The Cited References do not Render Dependent Claims 2-5 or 7-11 Obvious32

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