	Paper No
UNITED STATES PATENT AND TRADEMAI	RK OFFICE
BEFORE THE PATENT TRIAL AND APPE	AL BOARD
MEDTRONIC, INC.	
Petitioner,	
v.	
TELEFLEX INNOVATIONS S.À.R.I	•,
Patent Owner	
Case No: IPR2020-00126 U.S. Patent No. 8,048,032	-

**PETITIONER'S REPLY** 

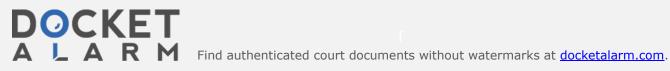


## TABLE OF CONTENTS

			Page			
TAB	LE OF	CON	TENTSi			
TAB	LE OF	AUT	HORITIES iii			
I.	INTRODUCTION1					
II.	OF "	THE BOARD CAN ADOPT ITS PRELIMINARY CONSTRUCTION OF "INTERVENTIONAL CARDIOLOGY DEVICES" (INDEPENDENT CLAIMS 1, 11)				
III.	ITOI	J INV	ALIDATES ALL CHALLENGED CLAIMS5			
	A.	Itou	is Prior Art5			
	В.	porti diam	OUND 1: Itou discloses a tubular structure/flexible tip on "defining a coaxial lumen having a cross-sectional inner leter through which interventional cardiology devices are table" (Claims 1, 11)			
		1.	Itou discloses that all four types of interventional cardiology devices are insertable			
		2.	The opening of Itou is actually larger, allowing larger devices through as well			
	C.	Itou	Discloses or Renders Obvious Claims 3 and 149			
		1.	GROUND 1: Itou discloses claims 3 and 149			
		2.	GROUND 2: Itou in view of Ressemann renders claims 3 and 14 obvious			
	D.	D. GROUND 1: Itou discloses a tubular structure that "includes a flexible cylindrical distal tip portion" (claim 6)				
	E.	GRC	OUNDS 1, 2: Itou discloses or renders obvious claim 1314			
IV.	SOM	IETHI	TS SECONDARY CONSIDERATIONS BASED UPON NG IT DID NOT INVENT—A RAPID-EXCHANGE OF A GUIDE EXTENSION CATHETER16			



	A.	Mother-in-child and Rx devices were well known, and so was the combination.	18
	В.	PO's secondary consideration evidence all relates to prior art features and functionality.	19
V.	CON	ICLUSION	22



#### **TABLE OF AUTHORITIES**

	Page(s)
Cases	
Accent Packaging, Inc. v. Leggett & Platt, Inc., 707 F.3d 1318 (Fed. Cir. 2013)	5
Allied Erecting & Dismantling Co. v. Genesis Attachments, 825 F.3d 1373 (Fed. Cir. 2016)	15, 16
Amazon.com, Inc. v. Barnesandnoble.com, Inc., 239 F.3d 1343 (Fed. Cir. 2001)	19
Google LLC v. Lee, 759 F. App'x 992 (Fed. Cir. 2019)	15
In re Applied Materials, 692 F.3d 1289 (Fed. Cir. 2012)	15, 16
<i>In re Kao</i> , 639 F.3d 1057 (Fed. Cir. 2011)	17, 19, 20
Johns Hopkins Univ. v. Datascope Corp., 543 F.3d 1342 (Fed. Cir. 2008)	20
KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007)	12
Mars, Inc. v. H.J. Heinz Co., 377 F.3d 1369 (Fed. Cir. 2004)	14
Mytee Prods., Inc. v. Harris Research, Inc., 439 F. App'x 882 (Fed Cir. 2001)	9, 10
Ormco Corp. v. Align Tech., Inc., 463 F.3d 1299 (Fed. Cir. 2006)	19
Sakraida v. Ag Pro, Inc., 425 U.S. 273 (1976)	



4
11
17



# DOCKET A L A R M

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

### **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

#### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

#### **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

