Paper No
UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
MEDTRONIC, INC., AND MEDTRONIC VASCULAR, INC.
Petitioner,
V.
TELEFLEX INNOVATIONS S.À.R.L.,
Patent Owner
Case No: IPR2020-00128
U.S. Patent No. RE45,380
PETITIONER'S REPLY



TABLE OF CONTENTS

				Page	
TAB	BLE OI	F CON	NTENTS	i	
TAB	BLE OF	FAUT	THORITIES	iii	
I.	INT	NTRODUCTION1			
II.		ONSTRUCTION OF "INTERVENTIONAL CARDIOLOGY EVICES" (INDEPENDENT CLAIMS 1, 12)2			
III.	ITO	U INV	ALIDATES ALL CHALLENGED CLAIMS	5	
	A.	A. Itou is prior art5			
	В.	port diar	OUND 1: Itou discloses a tubular structure/flexible tip tion "defining a coaxial lumen having a cross-sectional innemeter through which interventional cardiology devices are extable" (claims 1, 12)		
		1.	Itou discloses that all four types of interventional cardiology devices are insertable.	6	
		2.	PO is mistaken as to the "effective size" of the opening to the lumen of catheter (2).		
	C.	Itou	discloses or renders obvious claims 3 and 15	9	
		1.	GROUND 1: Itou discloses claims 3 and 15	9	
		2.	GROUND 2: Itou in view of Ressemann renders claims 3 and 15 obvious.		
	D.	O. GROUND 1: Itou discloses a tubular structure that "includes a flexible cylindrical distal tip portion" (claim 6)		14	
	E.	GR	OUNDS 1, 2: Itou discloses or renders obvious claim 14	15	
IV.	SON	ЛЕТН	RTS SECONDARY CONSIDERATIONS BASED UPON ING IT DID NOT INVENT-A RAPID EXCHANGE OF A GUIDE EXTENSION CATHETER	17	



	1.	Mother-in-child and Rx devices were well known, and so was the combination.	18
	2.	PO's secondary consideration evidence all relates to prior art features and functionality	19
V.	AIA PATEN	NT	22
VI	CONCLUS	ION	23



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)	21
KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007)	13
Mars, Inc. v. H.J. Heinz Co., 377 F.3d 1369 (Fed. Cir. 2004)	14
Mytee Products, Inc. v. Harris Research, Inc., 439 F. App'x 882 (Fed Cir. 2001)	10
Ormco Corp. v. Align Tech., Inc., 463 F.3d 1299 (2006)	
Sakraida v. Ag Pro, Inc., 425 U.S. 273 (1976)	



Synqor, Inc. v. Artesyn Techs., Inc.,	
No. 2:07-CV-497-TJW-CE, 2010 WL 2991037 (E.D. Tex. July 26,	
2010), aff'd, 709 F.3d 1365 (Fed. Cir. 2013)	4
Tyco Healthcare Grp. LP v. Ethicon Endo-Surgery, Inc., 774 F.3d 968 (Fed. Cir. 2014)	11
W.M. Wrigley Jr. Co. v. Cadbury Adams USA LLC, 683 F.3d 1356 (Fed. Cir. 2012)	19
ZUP, LLC v. Nash Mfg., Inc., 896 F.3d 1365 (Fed. Cir. 2018)	18



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.

