

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MEDTRONIC, INC., AND MEDTRONIC VASCULAR, INC.,

Petitioner,

v.

TELEFLEX INNOVATIONS S.À.R.L.

Patent Owner

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**DECLARATION OF MICHAEL JONES  
SUBMITTED IN SUPPORT OF PETITIONER'S REPLIES**

## TABLE OF CONTENTS

|  | Page |
|--|------|
| I. INTRODUCTION .....  | 1    |
| II. QUALIFICATIONS .....   | 1    |
| III. LEVEL OF ORDINARY SKILL IN THE ART .....  | 3    |
| IV. MECHANISM OF BACK-UP FORCE .....   | 4    |
| A. A Catheter-in-Catheter Assembly Decreases the Distance that<br>an Interventional Cardiology Device Travels in the Vasculature.....                    | 7    |
| B. A Catheter-in-Catheter Assembly Increases the Moment-of-<br>Inertia, Which is an Increase in the Stiffness of the Assembly. ....                      | 8    |
| V. ITOU .....  | 9    |
| VI. RESSEMANN .....  | 17   |
| A. Rationale for Modifying Embodiment 100 with Collar 2141.....  | 17   |
| 1. Use of flexibility transition members in the art.....   | 19   |
| B. Feasibility of Modifying Embodiment 100 with Collar 2141 .....  | 25   |
| 1. Ressemann and collar 2141 .....   | 38   |
| C. Modification of Ressemann to Achieve a 1 Fr. Differential<br>between the Evacuation Lumen and the Guide Catheter .....                                | 44   |
| VII. MODIFICATION OF ITOU WITH RESSEMANN COLLAR 2141.....  | 49   |
| VIII. MODIFICATION OF ITOU OR RESSEMANN WITH KATAISHI.....   | 57   |
| IX. KONTOS .....   | 64   |
| A. Kontos Resists Axial and Shear Forces that Would Otherwise<br>Tend to Dislodge the Guide Catheter. ....   | 66   |
| B. Kontos Does Not Require a Narrow Tube 16 to Protect the<br>PTCA Catheter Contained Therein. ....  | 69   |
| C. After Replacing the Funnel with a Side Opening, Kontos’s<br>Support Catheter 10 could be made bigger.....   | 72   |
| D. Modifying Kontos with Ressemann’s support collar.....   | 81   |
| E. Modifying Kontos with Kataishi’s shape.....   | 89   |
| X. GIVEN RESSEMANN’S SUPPORT COLLAR 2141, AND THE<br>SHAPE OF KATAISHI’S DESIGN, THE ULTIMATE PROXIMAL<br>SIDE OPENING SHAPE IS AN OBVIOUS DESIGN CHOICE |      |

DETERMINED THROUGH ROUTINE EXPERIMENTATION AND  
OPTIMIZATION .....91

XI. BY MAY 3, 2006, IT WAS KNOWN IN THE ART TO PROCESS A  
STIFF HYPOTUBE TO IMPROVE STRAIN RELIEF AND  
TRANSITIONING STIFFNESS BETWEEN A HYPOTUBE AND A  
FLEXIBLE CATHETER.....96

## **I. Introduction**

1. I have been retained by Robins Kaplan LLP on behalf of Medtronic, Inc. and Medtronic Vascular, Inc. (“Medtronic”) as an independent expert.

2. I am informed that Medtronic intends to use my opinions in support of petitions pending at the Patent Trial and Appeal Board (“PTAB”) concerning U.S. Patent Nos. 8,048,032; RE45,380; RE45,776; RE45,760; and RE47,379 (the “Teleflex Patents”): IPR2020-00126, IPR2020-00127, IPR2020-00128, IPR2020-00129, IPR2020-00130, IPR2020-00132, IPR2020-00134, IPR2020-00135, IPR2020-00136, IPR2020-00137 and IPR2020-00138.

3. I have been asked to provide my opinion on the disclosures of certain patents and articles in view of the knowledge of a POSITA as of the date of invention of the Teleflex Patents.

4. I am informed that the parties dispute the date of invention of the patents that are the subject of the IPRs. My opinions herein are the same whether the relevant date is May 3, 2006 or early 2005.

5. I make this Declaration based on my personal education, experience, and knowledge of medical device product development since the mid-1980s. I have also reviewed the materials cited herein.

## **II. Qualifications**

6. My curriculum vitae is attached as Appendix A.

7. I received a Bachelor of Science degree in Chemical Engineering from the University of California, Berkeley in 1984. I later earned a Master of Science degree in Engineering, Mechanics and Materials, in 1995 from California State University, Long Beach.

8. From the mid-1980s through the late-1990s I worked as an engineer responsible for various aspects of medical device design, development, and manufacturing for products that included catheters for treating thrombo-embolic stroke, catheters for treating subarachnoid hemorrhage, balloon catheters for treating vascular spasm (Micro Therapeutics, Inc.), an electrosurgical balloon catheter and a ureteral stent product line (Applied Medical Resources), urological balloon catheters (Baxter Healthcare), embolectomy catheters, endo tracheal and tracheostomy tubes, and angioplasty catheters (Shiley).

9. Since 1997, I have worked at Design Development and Fabrication, Inc. in contract mechanical engineering, focused on product design and development. My projects included prototype designs for minimally invasive, surgical, and implantable devices, development and fabrication for surgical devices, test fixture design and fabrication, and process validation in support of PMA filings. Clients included: Edwards Lifesciences Inc., SenoRx Inc, Vascular Control Systems Inc., Micro Therapeutics and Neuroperfusion.

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