UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner,

v.

TELEFLEX LIFE SCIENCES LIMITED,

Patent Owner.

Case IPR2020-01341 U.S. Patent No. 8,142,413

PETITIONER'S REPLY



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II.	CLAIM CONSTRUCTION				
	A.	"Interventional Cardiology Device(s)"			
	B.	Claim-Step Order			
III.	JOTI	OU IS PRIOR ART			
	A.	Teleflex must prove prior invention			
	B.	Teleflex failed to prove reduction to practice before Itou			
		1. Teleflex failed to show that VSI assembled prototypes	9		
		2. Teleflex failed to show that VSI performed the claimed methods.	.12		
		3. Teleflex failed to show that VSI determined that its inventions would work for their intended purpose	.16		
	C.	Teleflex has not shown diligence			
	D.	Evidence shows that VSI did <i>not</i> actually or constructively reduce to practice before Itou	24		
IV.	GROUND 1: ITOU ANTICIPATES				
	A.	Catheter 5 is an interventional cardiology device			
	B.	Catheter 5 is inserted through the guide catheter "alongside of the substantially rigid portion" of the coaxial guide catheter			
	C.	Itou discloses challenged claims depending from claim 1			
V.	GRO	OUNDS 2, 3: ITOU RENDERS OBVIOUS30			



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	A.	cardi	OSITA had the motivation to advance interventional cology devices other than catheter 5 through Itou's catheter or catheter 2 was positioned in the coronary artery.	31		
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