

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

TELEFLEX INNOVATIONS S.A.R.L.
Patent Owner.

Case IPR2020-01341
Patent 8,142,413

**PATENT OWNER'S LIST OF IMPROPER REPLY ARGUMENTS AND
EVIDENCE**

Pursuant to the Board's authorization provided on September 23, 2021 (Paper 65), Patent Owner Teleflex identifies the following arguments and evidence:

1) **Petitioner's new evidence purporting to show that stents were insertable through an opening of 0.046 inches.** The following arguments and evidence correspond:

- a. Reply (Paper 51), page 33-34 (Section V.B);
- b. Ex-1806 ¶¶30-34; Ex-1807, ¶42-46; and
- c. Ex-1015, 641; Ex-1802; Ex-1803; Ex-1804; Ex-1811.

Dated: October 1, 2021

Respectfully submitted,

/J. Derek Vandenburg /

J. Derek Vandenburg (Lead Counsel)

Registration No. 32,179

Carlson, Caspers, Vandenburg
& Lindquist, P.A.

225 South Sixth Street, Suite 4200

Minneapolis, MN 55402

Telephone: (612) 436-9600

Facsimile: (612) 436-9650

Email:

DVandenburg@carlsoncaspers.com

Lead Counsel for Patent Owner

CERTIFICATION OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e) and the agreement of the parties, the undersigned certifies that on October 1, 2021, a true and correct copy of the foregoing *Patent Owner's List of Improper Reply Arguments and Evidence* was served via electronic mail upon the following:

Cyrus A. Morton (Reg. No. 44,954)
Sharon Roberg-Perez (Reg. No. 69,600)
Christopher A. Pinahs (Reg. No. 76,375)
Robins Kaplan LLP
800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55401
Phone: 349-8500
Fax: 612-339-4181
Email: Cmorton@robinskaplan.com
Email: Sroberg-perez@robinskaplan.com
Email: Cpinahs@robinskaplan.com

/J. Derek Vandenburg/

J. Derek Vandenburg
(Lead Counsel for Patent Owner)