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 LIFE SCIENCES LIMITED,

Patent Owner.

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Case No.: IPR2020-01342
U.S. Patent No. 8,142,413

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

Pursuant to the Board's authorization provided on September 23, 2021 (Paper 50), Petitioner identifies the following support from the Petition and/or the Patent Owner Response demonstrating each portion of Petitioner's Reply or evidence does not exceed the scope of a proper reply:

1. **Petitioner's theory relying on modifications to Kontos.**

The following arguments and evidence correspond:

    a.   Petition (Paper 1), pages 56-61, 63 (Sections VIII.D, E, G);

    b.   Ex-1405, ¶¶ 210-221, 252;

    c.   Ex-1442, ¶¶ 63-64, 84, 100, 104-106;

    d.   Patent Owner's Response (Paper 24), pages 26-31 (Section V.C.1), 42-43 (Section V.D); and

    e.   Ex-2138, ¶¶ 224-35, 265-75; Ex-2145, ¶¶ 146-47, 149, 188-91, 208-211.

Dated: October 8, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2021, a copy of this document has been

served by electronic mail on Patent Owner's counsel at the following addresses

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