UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

TELEFLEX INNOVATIONS S.À.R.L.,

Patent Owner.

Case No.: IPR2020-01344 U.S. Patent No: RE46,116

DECLARATION OF RICHARD A. HILLSTEAD, PH.D., FAHA

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3.	The patentee didn't describe a side opening with "at least two inclined slopes" until, at best, filing the '161 Application (issued as '380 patent) on November 1, 2013	24
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В.	Kontos as modified by Ressemann's angled proximal side opening is more rigid than the distal end portion of the tubular structure
C.	Kontos as modified by Ressemann discloses reinforcing the tubular structure with a braid or a coil that is surrounded by a polymer
D.	Kontos as modified by Ressemann discloses a reinforcing braid or coil that is 20 to 30 cm
Е.	Kontos as modified by Ressemann discloses a side-opening structure having at least two inclined slopes
F.	Kontos's support assembly 10, as modified by Ressemann, has at least three different regions of flexibility
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EXHIBIT LIST

Exhibit	Description
1401	U.S. Patent No. RE 46,116 ("the '116 patent")
1402	File history for U.S. Patent No. 8,292,850
1403	File history for U.S. Patent No. RE 46,116
1407	U.S. Patent No. 7,736,355 ("Itou")
1408	U.S. Patent No. 7,604,612 ("Ressemann")
1409	U.S. Patent No. 5,439,445 ("Kontos")
1410	New Method to Increase a Backup Support of a 6 French Guiding Coronary Catheter, Catheterization and Cardiovascular Interventions 63: 452-456 (2004) ("Takahashi")
1415	Excerpt from Grossman's Cardiac Catheterization, Angiography, and Intervention (6th edition) (2000) (chapters 1, 4, 11, 23-25).
1418	U.S. Patent No. 5,891,056 ("Ramzipoor")
1424	Boston Scientific, Summary of Safety and Effectiveness Data, TAXUS TM Express ^{2TM} Drug-Eluting Coronary Stent System (March 4, 2004)
1425	U.S. Publication Application No. 2005/0015073 ("Kataishi")
1426	U.S. Patent No. 5,489,278 ("Abrahamson")
1428	Baim, Randomized Trial of a Distal Embolic Protection Device During Percutaneous Intervention of Saphenous Vein Aorto-Coronary Bypass Grafts, Circulation 105:1285-1290 (2002) ("Baim")
1432	The sliding rail system (monorail): description of a new technique for intravascular instrumentation and its application to coronary angioplasty, Z. Kardio. 76:Supp. 6, 119-122 (1987) ("Bonzel")
1433	U.S. Publication Application No. 2004/0236215 (Mihara)
1435	U.S. Publication Application No. 2004/0010280 ("Adams '280")
1440	Excerpt of McGraw-Hill Dictionary of Scientific and Technical Terms (5th edition) (1994) (defining "flexural modulus")

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