

To: [Niederluecke, Kurt; MDT-VSI](#)
Cc: [VSI-MDT](#)
Date: Friday, January 24, 2020 5:21:11 PM
Attachments: [Ex V - 116 Claim Chart.pdf](#)
[Ex U - USRE46116.pdf](#)
[Ex T - 413 Claim Chart.pdf](#)
[Ex S - US8142413.pdf](#)
[Compare.pdf](#)
[2020 01 24 Teleflex First Amended Complaint DRAFT.pdf](#)

Kurt,

We plan on moving to amend the complaint to add counts for infringement of U.S. Patent Nos. 8,142,413 and RE46,116. Attached for your reference is a copy of the proposed amended complaint (in clean and redline from the original complaint) and additional exhibits. The scheduling order states that all motions to amend the pleadings need to be served on or before February 1, so please let us know by the end of business on Tuesday (1/28) whether Medtronic opposes the motion.

We also intend on supplementing the complaint in light of some recent corporate agreements. My understanding is that the agreements are going to be signed early next week and will have an effective date of February 3. You will see that we have drafted the amended complaint so that we can do this all in one step. We will forward the new agreements to you promptly once they are signed.

Regards,
Derek



Derek Vandenburg
Carlson, Caspers, Vandenburg, &
Lindquist, P.A.
225 S. Sixth St., Suite 4200,
Minneapolis, MN 55402
Direct: 612.436.9618
Cell: 612-991-3952
DVandenburg@carlsoncaspers.com
carlsoncaspers.com
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