

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.  
Petitioners,

v.

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

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Case IPR2020-01344  
Patent RE46,116

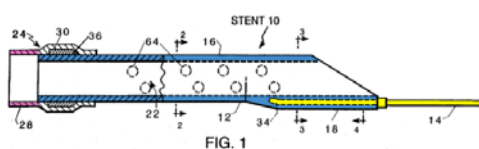
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**PATENT OWNER'S LIST OF IMPROPER REPLY ARGUMENTS AND  
EVIDENCE**

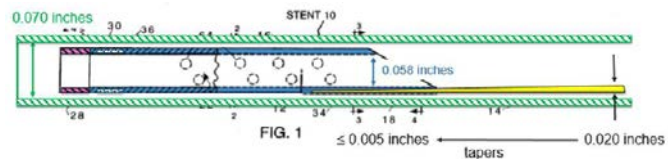
Pursuant to the Board's authorization provided on September 23, 2021 (Paper 45), Patent Owner Teleflex identifies the following arguments and evidence:

**1) Petitioner's new theory relying on extensive, additional modifications to material aspects of Kontos (at least six new modifications):**

Petition theory:



New theory in reply:



The following arguments and evidence correspond:

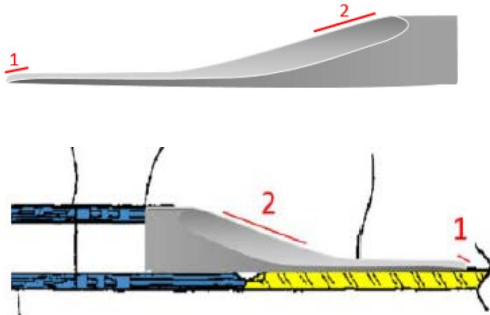
- a) Reply (Paper 37), pages 4, 7, 13, 17-18 (Section III.A-C); and
- b) Ex-1806, ¶¶106, 119, 128, 130-31; Ex-1807, ¶¶127-37, 143-44, 144-49.

**2) Petitioner's new construction of "coaxially aligned".** The following arguments and evidence correspond:

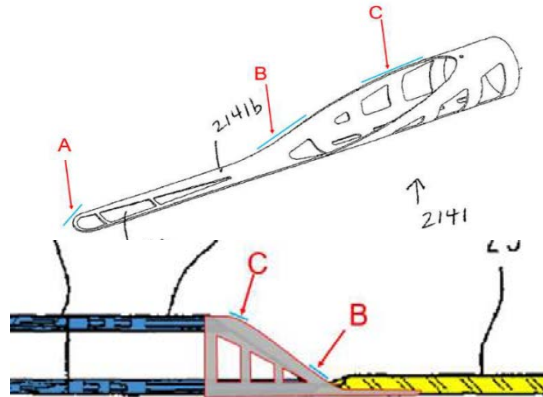
- a) Reply (Paper 37), pages 16-17; and
- b) Ex-1806, ¶¶126-128.

3) **Petitioner’s new theory that Ressemann’s collar discloses three inclined portions:**

Petition theory:



New “three inclines” theory:



The following arguments and evidence correspond:

- c) Reply (Paper 37), pages 13-16 (Section II.A.5); and
- d) Ex-1806, ¶¶82-93; Ex-1807, ¶¶60, 72-73, 154, 158.

Dated: October 1, 2021

Respectfully submitted,

/J. Derek Vandenburg /

J. Derek Vandenburg (Lead Counsel)

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## **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:

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