

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

New World Medical, Inc.,
Petitioner

v.

MicroSurgical Tech., Inc.,
Patent Owner

Case No. IPR2020-01573

U.S. Patent Nos. 9,107,729

**PETITIONER'S REPLY TO
PATENT OWNER'S RESPONSE TO PETITION**

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	MST’S ARGUMENTS ARE UNSUPPORTED.....	2
III.	MST MISCHARACTERIZES THE CLAIMED INVENTION	5
IV.	THE CHALLENGED CLAIMS ARE UNPATENTABLE.....	8
A.	Ground 1: Quintana Anticipates Claims 1-4 and 7-9.....	8
1.	Quintana discloses “creating or removing a strip of TM”	8
2.	Quintana discloses a “dual blade device”	15
3.	Quintana discloses “first and second cutting edges contacting the TM” and “concurrently cutting a strip of TM of defined width”	20
4.	Quintana discloses a “bend or curve” of at least 30°	21
5.	Quintana discloses an “ab interno” procedure.....	22
B.	Ground 5: Jacobi Anticipates Claims 1-4 and 7-8.....	23
1.	Jacobi discloses a “dual blade device”	23
2.	Jacobi discloses “concurrent cutting by first and second cutting edges of a strip of TM of defined width”	24
3.	Jacobi discloses the claimed “bend or curve”	25
C.	Grounds 2-4 and 6.....	26
V.	CONCLUSION.....	28

TABLE OF AUTHORITIES

Cases

<i>Allied Erecting & Dismantling Co. v. Genesis Attachments, LLC</i> , 825 F.3d 1373 (Fed. Cir. 2016)	27
<i>Atlas Powder Co. v. Ireco, Inc.</i> , 190 F.3d 1342 (Fed. Cir. 1999).....	15
<i>Biogen Idec, Inc. v. GlaxoSmithKline LLC</i> , 713 F.3d 1090 (Fed. Cir. 2013).....	19, 28
<i>Cordis Corp. v. Medtronic AVE, Inc.</i> , 339 F.3d 1352 (Fed. Cir. 2003)	7
<i>In re Gleave</i> , 560 F.3d 1331 (Fed. Cir. 2009)	5, 28
<i>In re Schreiber</i> , 128 F.3d 1473 (Fed. Cir. 1997)	6
<i>Kaneka Corp. v. Xiamen Kingdomway Grp. Co.</i> , 790 F.3d 1298 (Fed. Cir. 2015).....	18
<i>KSR Int'l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	26
<i>Meiresonne v. Google, Inc.</i> , 849 F.3d 1379 (Fed. Cir. 2017).....	27

Regulations

37 C.F.R. §42.51(b)(1)(ii).....	4
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PETITIONER'S UPDATED EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent 9,107,729 (“the ‘729 patent”)
1002	U.S. Patent 9,107,729 File History (“729 patent file history”)
1003	Declaration of Dr. Peter Netland (“Decl.”)
1004	Manuel Quintana, <i>Gonioscopic Trabeculotomy. First Results</i> , in 43 SECOND EUROPEAN GLAUCOMA SYMPOSIUM, DOCUMENTA OPHTHALMOLOGICA PROCEEDINGS SERIES 265 (E.L. Greve, W. Leydhecker, & C. Raitta ed., 1985) (“Quintana”)
1005	M. Johnstone <i>et al.</i> , “Microsurgery of SC and the Human Aqueous Outflow System,” <i>Am. J. Ophthalmology</i> 76(6):906-917 (1973) (“Johnstone”)
1006	U.S. Patent 4,900,300 to Lee (“Lee”)
1007	Philipp C. Jacobi <i>et al.</i> , “Technique of goniosurgery: a potential treatment for advance chronic open angle glaucoma,” 81 BRITISH J. OPHTHALMOLOGY 302-307 (1997) (“Jacobi”)
1008	Richard S. Snell <i>et al.</i> , <i>Clinical Anatomy of the Eye</i> , Malden, Massachusetts: Blackwell Science, Inc. (2 nd ed., 1998) (“Snell”)
1009	Am. Acad. Of Ophthalmology, <i>Section 8 External Disease and Cornea</i> , in BASIC AND CLINICAL SCIENCE COURSE 2001-2002 (2001) (“AAO Cornea”)
1010	Michael John Hogan, <i>History of the Human Eye: An Atlas and Textbook</i> . Philadelphia, Pennsylvania: W. B. Saunders Company (1971) (“Hogan”)
1011	M. Bruce Shields, <i>Textbook of Glaucoma, Fourth Edition</i> . Baltimore, Maryland: Williams & Wilkins (1998) (“Shields”)

Exhibit No.	Description
1012	Am. Acad. Of Ophthalmology, <i>Section 10 Glaucoma</i> , in BASIC AND CLINICAL SCIENCE COURSE 2000-2001 (2000) (“AAO Glaucoma”)
1013	Phillip C. Jacobi <i>et al.</i> , “Perspectives in trabecular surgery,” <i>Eye</i> 2000;14(Pt 3B)(3b):519-530 (2000) (“Jacobi 2000”)
1014	F. Skjaerpe, “Selective Trabeculectomy. A Report of a New Surgical Method for Open Angle Glaucoma,” <i>Acta Ophthalmologica</i> 61:714-727 (1983) (“Skjaerpe 1983”)
1015	U.S. Patent Application Publication 2002/0111608 to Baerveldt (“Baerveldt”)
1016	U.S. Patent 4,501,274 to Skjaerpe (“Skjaerpe ‘274”)
1017	<i>Microsurgical Technology, Inc. v. New World Medical, Inc.</i> , No. 1:20-cv-00754, Doc. 1 (D. Del. June 4, 2020) (“Complaint”)
1018	E. Ferrari <i>et al.</i> , “Ab-interno trabeculo-canalectomy: surgical approach and histological examination,” <i>European J. Ophthalmology</i> 12(5):401-05 (2002) (“Ferrari”)
1019	U.S. Patent App. 13/159,356 File History (“356 application file history”)
1020	T. Shute, “A Novel Technique for Ab Interno Trabeculectomy: Description of Procedure and Preliminary Results,” <i>Am. Glaucoma Society 29th Annual Meeting Poster Abstracts</i> 34-35 (2019) (available at: https://ags.planion.com/Web.User/AbstractDet?ACCOUNT=AGS&CONF=AM19&ABSID=12309) (“Shute”)
1021	Arsham Sheybani, <i>Bent Ab-interno Needle Goniectomy (BANG)</i> , YouTube (Aug. 24, 2017), https://youtu.be/b5QxWts-Pxs (“BANG Video”)

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