

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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EDWARDS LIFESCIENCES CORPORATION,

Petitioner,

v.

ENDOHEART AG

Patent Owner.

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IPR2016-00299

U.S. Patent No. 8,182,530

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**PATENT OWNER'S PRELIMINARY RESPONSE**

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**Preliminary Response to Petition for *Inter Partes* Review  
of U.S. Patent No. 8,182,530**

**LIST OF EXHIBITS**

No.	Exhibit
<b>2001</b>	Seldinger, Sven, I. "Catheter Replacement of the Needle in Percutaneous Arteriography." <i>Acta Radiologica</i> , 39(5): 368-376 (1952) ("Seldinger").
<b>2002</b>	Pitta, Sridevi, R. "Complications Associated with Left Ventricular Puncture." <i>Catheterization and Cardiovascular Interventions</i> , 76:993–997 (2010) ("Pita")
<b>2003</b>	Levy, Morris, J. and Lillehei, C. Walton " Percutaneous Direct Cardiac Catheterization — A New Method, with Results in 122 Patients." <i>N Engl J Med</i> , 271.6: 273-280 (Aug, 1964) ("Levy and Lillehei").
<b>2004</b>	Defendant Edwards Lifesciences Corporation’s Opening Claim Construction Brief in <i>Endoheart AG, v. Edwards Lifesciences Corporation</i> , Case No. 1:14-cv-1473 LPS-CJB in the United States District Court for the District of Delaware.
<b>2005</b>	Excerpt from Deposition Transcript of Christoph H. Huber (January 27, 2016) in the US District Court for the District of Delaware (“1/27/16 Huber Dep. Tr.”)
<b>2006</b>	Instructions For Use - Edwards SAPIEN Transcatheter Heart Valve With The Ascendra Balloon Catheter
<b>2007</b>	Emilio R. Giuliani et al., <i>Cardiology: Fundamentals and Practice</i> 1516-1517 (2d ed., Mosby-Year Book, Inc., St. Louis Missouri 1991) (“Giuliani”)
<b>2008</b>	Assignment of U.S. Patent Application No. 10831770 From Bergheim to 3F Therapeutics Inc. (November 1, 2004).
<b>2009</b>	Assignment of U.S. Patent Application No. 10831770 from 3F Therapeutics Inc. to Medtronic 3F Therapeutics Inc. (March 26, 2012)
<b>2010</b>	Definition of “Configured”, Collins English Dictionary - Complete & Unabridged 2012 Digital Edition

<b>2011</b>	Notice regarding the serve of subpoenas to Rodolfo C. Quijano in the United States District Court for the District of Delaware
<b>2012</b>	Letter from Dr. Rodolfo C. Quijano to William O'Hare, Snell & Wilmer.
<b>2013</b>	E-mail from Dr. Rodolfo C. Quijano to Christoph Huber (October 6, 2006)
<b>2014</b>	E-mail from Dr. Rodolfo C. Quijano to Christoph Huber (April 19, 2006)
<b>2015</b>	Presentation of the Lecture “New Tools for New Goals” in Scottsdale, Arizona at the ISCS Convention (February 2004)
<b>2016</b>	Excerpt from Deposition Transcript of Christoph H. Huber (January 29, 2016) in the US District Court for the District of Delaware (“1/29/16 Huber Dep. Tr.”)
<b>2017</b>	Cardima Inc., Notice of Annual Shareholders Meeting (May 19, 2005)
<b>2018</b>	Excerpt from the History File of Bergheim <i>U.S. Patent Application Publication No. 2005/0240200</i> .
<b>2019</b>	Press Release – Percutaneous Valve Technologies, Inc. was acquired by Edwards Lifesciences Inc.
<b>2020</b>	List of Assignments From Percutaneous Valve Technologies, Inc. To Edwards Lifesciences PVT, Inc.
<b>2021</b>	List of U.S. Patents That Names Alain Cribier As An Inventor Or Co-Inventor
<b>2022</b>	List Of Entities Wholly Owned By Edwards Lifesciences Corporation
<b>2023</b>	Lists of Patents owned by Edwards Lifesciences Corporation and Edwards Lifesciences LLC
<b>2024</b>	Edwards Lifesciences’ Answer And Counterclaims in the United States District Court for the District of Delaware.
<b>2025</b>	French Catheter Scale – Wikipedia Website
<b>2026</b>	Needle Gauge Comparison Chart - Wikipedia Website
<b>2027</b>	Jamieson, W.R.E., et. al. “Antegrade Placement of the Aortic Valve Stent: Transventricular Delivery With the ENTRATA™ System.” <i>Euro Intervention Supplements</i> 1(A): 14A-18A (2006) (“Jamieson”)
<b>2028</b>	Cribier, Alain, et al. “Early Experience With Percutaneous Transcatheter Implantation of Heart Valve Prosthesis for the

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