UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C. 20436

Before the Honorable MaryJoan McNamara
Administrative Law Judge

In the Matter of **CERTAIN DERMATOLOGICAL TREATMENT DEVICES AND COMPONENTS THEREOF**	**Investigation No. 337-TA-1356**

RESPONDENTS' AMENDED NOTICE OF PRIOR ART

Respondent Sung Hwan E&B Co., LTD. d/b/a SHEnB Co. LTD ("SHEnB"); Respondent Aesthetics Biomedical, Inc. ("AB"); Respondent Cartessa Aesthetics, LLC ("Cartessa"); Respondents Lutronic Corporation; Lutronic Aesthetics, Inc., also known as Lutronic, Inc. and Lutronic, LLC (collectively, "Lutronic"); Respondent Ilooda, Co., Ltd. ("Ilooda"); Respondent Cutera, Inc. ("Cutera"); Respondent Jeisys Medical Inc. ("Jeisys"); Respondent Cynosure, LLC ("Cynosure"); Respondents Rohrer Aesthetics, LLC and Rohrer Aesthetics, Inc. (collectively, "Rohrer"); EndyMed Medical, Ltd. and EndyMed Medical, Inc. (collectively, "EndyMed") (collectively, "Respondents"), by their undersigned attorneys, hereby provide their Amended Notice of Prior Art ("NOPA"). Respondents may rely on the prior art references cited below, alone or in combination, as anticipating and/or rendering obvious the various asserted claims (the "Asserted Claims") of U.S. Patent No. 9,480,836 (the "'836 Patent"); U.S. Patent No. 10,058,379 (the "'379 Patent"); U.S. Patent No. 11,406,444 (the "'444 Patent"); U.S. Patent No. 9,320,536 (the "'536 Patent"); U.S. Patent No. 9,775,774 (the "'774 Patent"); and U.S. Patent No. 10,869,812 (the "'812 Patent") (collectively the "Asserted

Serendia, LLC
Exhibit 2111
Jeisys v. Serendia
IPR2024-00383
Ex. 2111-001

Patents") against Serendia, LLC ("Serendia" or "Complainant").

This Amended NOPA addresses concerns raised by Complainant regarding the number of references per patent – 12 – in the NOPA timely filed by Respondents on May 24, 2023. Respondents note that Order No. 6 (the Adopted Procedural Order) states that the Notice of Prior Art "*should be* limited to no more than 10 pieces of prior art per patent including combinations" (emphasis added) and Ground Rule 4 does not impose any discrete limit on the number of references. Respondents further note that Complainant has asserted 70 claims in this Investigation, and therefore do not concede that the original NOPA was defective. In order to avoid dispute and by agreement of the parties as reflected in the joint motion filed on June 2, 2023, however, Respondents are amending their NOPA to list a total of 10 pieces of prior art per patent. Respondents reserve their right to further amend this NOPA.

Respondents may rely on any technology or product described in, and any printed publication relating to, the prior art listed below either as a standalone reference or in combination with other references identified in this NOPA. Respondents also may rely on any and all of the art listed below in reference to a particular Asserted Patent to anticipate and/or render obvious any other Asserted Patent. Respondents also may rely on the references listed for other purposes, including but not limited to showing the state of the art and the information and knowledge that would have been known to a person of ordinary skill in the art during the relevant periods for the Asserted Patents.

In addition to the references listed in this NOPA, Respondents may rely upon prior art that is or was: (1) referenced in the Asserted Patents or the prosecution history of the Asserted Patents; (2) identified or produced by Complainant in this Investigation; (3) identified as a hearing exhibit by any party; (4) contained within any patent or patent prosecution history that

is related to one or more of the Asserted Patents, including foreign counterparts; (5) identified, considered, or relied upon by the inventors of the Asserted Patents, whether or not cited in any prosecution history; (6) related to any of the references identified in this NOPA, including patent applications, foreign counterparts and pre-grant publications; (7) cited in any expert report served during this Investigation; (8) identified during the remainder of discovery; and/or (9) identified in Respondents' interrogatory responses. Respondents may, in addition to the references listed in this NOPA, rely on documents and information that are not prior art, and therefore need not be identified in this notice, for other purposes such as evidence of inherency in any of the prior art identified and state of the art.

Discovery is ongoing in this Investigation. This identification of prior art is based on the evidence produced in this matter to date and Respondents' ongoing investigation. The named inventors of the Asserted Patents have not yet been deposed, Complainant has not provided adequate or complete infringement or validity contentions on prior art products, expert reports have not been exchanged, and expert discovery has not commenced. Respondents reserve the right to amend and/or supplement this NOPA to identify prior art references that may be discovered after the date of this NOPA or to identify additional prior art that may be rendered material based upon positions Complainant or its witnesses may adopt in this Investigation. Respondents reserve the right to supplement this NOPA as additional information becomes available, in accordance with the Ground Rules.

I. Prior Art for the '836 Patent, '379 Patent, and '444 Patent.

Country of Origin	Patent or Publication Number	Filing Date	Issuance or Publication Date	Named Inventor
US	8,608,737	04/20/2009	12/17/2013	Mehta
US	7,824,394	04/01/2005	11/02/2010	Manstein
US	2007/0208340A1	04/05/2005	09/06/2007	Ganz

US	6,766,202	04/30/2002	07/20/2004	Underwood
US	10,799,285	10/06/2009	10/13/2020	Mulholland
KR	10-0852500	03/31/2008	08/18/2008	Lee
WO	2007/064718	11/29/2006	06/07/2007	Hantash

System	Date	Exemplary Evidence	Person or Entity with Knowledge
Daeshin Enterprise, Korea DeÁge system ("DeÁge")	12/18/2009	• Promotional flyers listing product specification • DeAge Receipt 2010.05.27 • DeAge – Busan Dermatology Clinic 2010.12.20 • DeAge 09-1050 KFDA 2009.12.18 • Photo of needle structure • DeAge "How to Use"	Daeshin Enterprise, 28 Digital-ro 330gi, Guro-gu, Seoul, Korea
ScarLet product manufactured by ViOL, Korea ("ScarLet")	06/11/2010	• SERENDIA-00017306; Scarlet intro • D&PS Monthly September 2010 • Shim 2010_DKU Thesis 2010.12.01 • Naver Blog The H Jan 10 2011	ViOL, Korea (known to Complainant's counsel)
Primaeva Medical Miratone System (also known as the Renesis System) ("Miratone")	09/01/2009	• *FDA Approval of Primaeva Medical System* ("FDA Approval") (letter of approval dated September 1, 2009) • *Miratone System User Manual* ("Miratone User Manual") (listing date of Draft as August 28, 2009) • *Miratone System Instructions for Use* ("Miratone Instructions") (listing date of Draft as August 28, 2009) • Hantash, et al., *Pilot Clinical Study of a Novel Minimally Invasive Bipolar Microneedle Radio Frequency Device,* Lasers in Surgery and Medicine 41:87–95 (2009) ("Hantash 2009") (listing the "investigational 35 W bipolar RF device" as "Renesis, Primaeva Meidcal, Inc.") • Berube, et al., *A Predictive Model of Minimally Invasive Fractional Radiofrequency Skin Treatment*, Lasers in Surgery and Medicine	Primaeva Medical, 1520 Centre Point Dr., Milpitas CA 95035

		41:473–478 (2009) ("Berube") (listing the "bipolar FRF device" as "Miratone, Primaeva Medical, Inc.") • Alexiades-Armenakas, et al., *Blinded, Randomized, Quantitative Grading Comparison of Minimally Invasive, Fractional Radiofrequency and Surgical Face-lift to Treat Skin Laxity*, Arch Dermatol. 2010; 146(4):396–405 ("Alexiades") (study involved "[t]he Miratone minimally invasive bipolar fractional RF (FRF system (Primaevea Medical, Inc, Pleasanton, California)") • *Renesis System User Manual (Rev. A)* ("Renesis User Manual")	

II. Prior Art for the '536 Patent, '774 Patent, and '812 Patent.

Country of Origin	Patent or Publication Number	Filing Date	Issuance or Publication Date	Named Inventor
US	8,608,737	04/20/2009	12/17/2013	Mehta
KR	10-0852500	03/31/2008	08/18/2008	Lee
KR	10-0719395	11/23/2005	05/17/2007	Kang
US	10,799,285	10/06/2009	10/13/2020	Mulholland
WO	2010/016848	08/22/2008	02/11/2010	Na
WO	2007/064718	11/29/2006	06/07/2007	Hantash
WO	2008/005477 A2	07/05/2007	01/10/2008	Livneh

System	Date	Exemplary Evidence	Person or Entity with Knowledge
Daeshin Enterprise, Korea DeÁge system ("DeÁge")	12/18/2009	• Promotional flyer listing product specification • DeAge Receipt 2010.05.27 • DeAge – Busan Dermatology Clinic 2010.12.20 DeAge 09-1050 KFDA 2009.12.18 • Photo of needle structure • DeAge "How to Use"	Daeshin Enterprise, 28 Digital-ro 330gi, Guro-gu, Seoul, Korea

ScarLet product manufactured by ViOL, Korea ("ScarLet")	06/01/2010	• SERENDIA-00017306; Scarlet intro • D&PS Monthly September 2010; • Shim 2010_DKU Thesis 2010.12.01; • Naver Blog The H Jan 10 2011.	ViOL, Korea (known to Complainant's counsel)
Primaeva Medical Miratone System (also known as the Renesis System) ("Miratone")	09/01/2009	• *FDA Approval of Primaeva Medical System* ("FDA Approval") (letter of approval dated September 1, 2009); • *Miratone System User Manual* ("Miratone User Manual") (listing date of Draft as August 28, 2009); • *Miratone System Instructions for Use* ("Miratone Instructions") (listing date of Draft as August 28, 2009); • Hantash, et al., *Pilot Clinical Study of a Novel Minimally Invasive Bipolar Microneedle Radio Frequency Device,* Lasers in Surgery and Medicine 41:87–95 (2009) ("Hantash 2009") (listing the "investigational 35 W bipolar RF device" as "Renesis, Primaeva Meidcal, Inc."); • Berube, et al., *A Predictive Model of Minimally Invasive Fractional Radiofrequency Skin Treatment*, Lasers in Surgery and Medicine 41:473–478 (2009) ("Berube") (listing the "bipolar FRF device" as "Miratone, Primaeva Medical, Inc."); • Alexiades-Armenakas, et al., *Blinded, Randomized, Quantitative Grading Comparison of Minimally Invasive, Fractional Radiofrequency and Surgical Face-lift to Treat Skin Laxity*, Arch Dermatol. 2010; 146(4):396–405 ("Alexiades") (study involved "[t]he Miratone minimally invasive bipolar fractional RF (FRF system (Primaevea Medical, Inc, Pleasanton, California)"); • *Renesis System User Manual (Rev. A)* ("Renesis User Manual").	Primaeva Medical, 1520 Centre Point Dr., Milpitas CA 95035

Dated: June 2, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Lesley McCall Grossberg, hereby certify that on June 2, 2023, copies of the foregoing **RESPONDENTS' AMENDED NOTICE OF PRIOR ART** were filed and served, pursuant to Commission regulations, to the following interested parties as indicated:

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