

From: [Trials](#)
To: [Hector, Bill](#); [Oliver, Justin J.](#); [Sandonato, Michael P.](#); [InMode-BTL-IPR](#); [rbemben-PTAB@sternekessler.com](#); [jchagnon-PTAB@sternekessler.com](#); [rcoller-PTAB@sternekessler.com](#); [cvira-PTAB@sternekessler.com](#); [PTAB@sternekessler.com](#)
Cc: [Trials](#)
Subject: RE: IPR2024-00703 - BTL INDUSTRIES, INC. v. INMODE LTD.
Date: Friday, June 27, 2025 3:25:12 PM

Counsel,

Patent Owner's unopposed request for authorization to file the corrected Patent Owner's Response, which corrects typographical errors, is granted.

Regards,

Tina Williams
Supervisory Paralegal Specialist
Patent Trial and Appeal Board

From: Hector, Bill <WAHector@Venable.com>
Sent: Thursday, June 26, 2025 4:13 PM
To: Trials <Trials@USPTO.GOV>
Cc: Oliver, Justin J. <JOliver@Venable.com>; Sandonato, Michael P. <MSandonato@Venable.com>; InMode-BTL-IPR <InMode-BTL-IPR@Venable.com>; rbemben-PTAB@sternekessler.com; jchagnon-PTAB@sternekessler.com; rcoller-PTAB@sternekessler.com; cvira-PTAB@sternekessler.com; PTAB@sternekessler.com
Subject: RE: IPR2024-00703 - BTL INDUSTRIES, INC. v. INMODE LTD.

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Dear Honorable Board,

Following up on my email below, Patent Owner seeks leave to file the attached Corrected POR, which corrects certain typographical errors. As indicated below, Patent Owner has conferred with Petitioner on these corrections, and Petitioner does not oppose.

Please let us know whether the Board approves Patent Owner's request for leave to file the Corrected POR.

Regards,
Bill Hector
Counsel for Patent Owner InMode Ltd.

[Bill Hector | Venable LLP](#)
t 415.653.3738

From: Hector, Bill <WAHector@Venable.com>
Sent: Tuesday, February 18, 2025 11:22 AM
To: trials@USPTO.gov
Cc: Oliver, Justin J. <JOliver@Venable.com>; Sandonato, Michael P. <MSandonato@Venable.com>; InMode-BTL-IPR <InMode-BTL-IPR@Venable.com>; rbemben-PTAB@sternekessler.com; ichagnon-PTAB@sternekessler.com; rcoller-PTAB@sternekessler.com; cvira-PTAB@sternekessler.com; PTAB@sternekessler.com
Subject: IPR2024-00703 - BTL INDUSTRIES, INC. v. INMODE LTD.

Dear Honorable Board,

Patent Owner has become aware of several typographical errors in its patent owner response (“POR”) filed January 22, 2025. There is a typographical error in the Table of Exhibits and a few instances in one section of the POR in which the POR properly cites to the Declaration of Dr. Poulos (EX2001) but erroneously cites to the wrong paragraph or is missing the pin cite.

Patent Owner therefore seeks leave to file the attached Corrected POR, which corrects these typographical errors. A redline of the only proposed changes over the original is provided below:

Citation	Requested Correction
Paper 12 (POR) at vii	Stedman’s Medical Dictionary (~~27th~~ <u>25th</u> Edition), ~~Lippincott~~ -Williams & Wilkins (~~2003~~ <u>1990</u>)
Paper 12 (POR) at 68	The “landmark study” describes treatments corresponding to claims 1, 26, and 35, as discussed below. See EX2018; EX2001, ¶ ~~178~~ <u>177</u> .
Paper 12 (POR) at 69	Both of the studies praised by Dr. Alinsod describe heating and remodeling vaginal tissue by applying an RF “treatment tip ... to the mucosal surface of the vaginal introitus starting at the hymenal ring and [treating] the entire area from the 1:00 o’clock to 11:00 o’clock position ... with RF energy pulses.” EX2018, 3; EX2017, 777; EX2001, ¶ ~~180~~ <u>179</u> .
Paper 12 (POR) at 69-70	The treatment was performed to heat tissue “beneath the surface” and while using cryogen so as not to affect the surface tissue. EX2018, 3 (right column); EX2017, 779, 780 (“nonablative”); EX2001, ¶ ~~180~~ <u>179</u> . Also, the treatment area extended from the hymenal ring (which forms a portion of circumference of the introitus) to about 1.6 cm from the introitus. EX2001, ¶ ~~179~~ <u>179</u> ; EX2018, 3 (describing a 20 cm ² treatment area over a 12 cm circumference (left column)). This treatment is commensurate in scope with the treatment of claim 1— “introitus inwardly to a location from 1 cm to 3.5 cm in from the introitus”—and claim 26—“tightening the introitus.” EX2001, ¶ ~~180~~ <u>179</u> ; EX1001, claims 1, 26. Also treating the area from “the 1:00 o’clock to 11:00 o’clock position ... moving the tip in a clockwise direction” is commensurate in scope with claim 35’s treatment of “heating a portion of the vagina circumferentially around its wall from 1 o’clock to 11 o’clock.” EX2018, 3 (right column); EX2017, 777; EX1001, claim 35; EX2001, ¶ ~~180~~ <u>179</u> .

Paper 12 (POR) at 70	Dr. Alinsod even performed his own study that provided “confirmation” of the studies of the Viveve treatment and concluded that such evidence “is a boon to successful treatment and may represent a key advance in the emerging field of vulvovaginal rejuvenation.” EX1025, 21 (also praising the lack of “downtime” or “risks” to the patients); EX2001, ¶181180.
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Patent Owner has conferred with Petitioner regarding this request, and Petitioner does not oppose.

Regards,
Bill Hector
Counsel for Patent Owner InMode Ltd.

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