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' NOTICE OF PRIOR ART

Pursuant to Ground Rule No. 4 and the Procedural Schedule set by Order No. 6 in this Investigation, 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 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

Serendia, LLC
Exhibit 2053
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Patent"); and U.S. Patent No. 10,869,812 (the "'812 Patent") (collectively the "Asserted Patents") against Serendia, LLC ("Serendia" or "Complainant").

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 may apply each prior art reference identified to any of the Asserted Patents. 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	8,900,231	02/09/2010	12/02/2014	Kreindel
US	10,799,285	10/06/2009	10/13/2020	Mulholland
KR	200441552	06/05/2007	08/25/2008	Lee
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	Daeshin Enterprise, 28 Digital-ro

		• DeAge – Busan Dermatology Clinic 2010.12.20 • DeAge 09-1050 KFDA 2009.12.18 • Photo of needle structure • DeAge "How to Use"	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 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)")	Primaeva Medical, 1520 Centre Point Dr., Milpitas CA 95035

		• *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	200441552	06/05/2007	08/25/2008	Lee
KR	10-0852500	03/31/2008	08/18/2008	Lee
KR	10-0719395	11/23/2005	05/17/2007	Kang
US	8,666,487	01/13/2010	04/21/2011	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);	Primaeva Medical, 1520 Centre Point Dr., Milpitas CA 95035

		• *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").	

Dated: May 24, 2023

Respectfully submitted,

/s/ Daniel E. Valencia
Brian R. Nester
Daniel E. Valencia
W. Kiersten Choi
Daniel J. Farnoly
Yong Joon Kwon
COVINGTON & BURLING LLP
One CityCenter, 850 Tenth Street, N.W.
Washington, DC 20001
Telephone: (202) 662-6000

Robert T. Haslam
Anupam Sharma
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067-4643
Telephone: (424) 332-4800
Email: COV-Ilooda-ITC@cov.com
Counsel for Respondents Ilooda, Co., Ltd. and Cutera, Inc.

/s/ Guy Yonay
David A. Loewenstein
Guy Yonay
Clyde A. Shuman
Kyle Auteri
PEARL COHEN ZEDEK LATZER BARATZ LLP
7 Times Square, 19th Floor
New York, NY 10036
Telephone: (646) 878-0800
Facsimile: (646) 878-0801
Email: EndyMed@PearlCohen.com

Counsel for Respondents EndyMed Medical, Ltd. and EndyMed Medical, Inc.

/s/ David M. Airan
Brian C. Rupp
David M. Airan
James W. Sanner
LEYDIG, VOIT & MAYER, LTD.
Two Prudential Plaza
180 N. Stetson Ave, Suite 4900
Chicago, IL 60601-6745
Telephone: (312) 616-5600
E-Mail: leydig-jeisys-itc@leydig.com

Paul M. Bartkowski
BARTKOWSKI PLLC
6803 Whittier Ave., Suite 200A
McLean, VA 22101
Telephone: (571) 533-3581
E-Mail: Jeisys-337@bartkowskipllc.com

Counsel for Jeisys Medical Inc. and Cynosure, LLC

/s/ Lesley M. Grossberg
Lesley McCall Grossberg
Jacqueline M. Lesser
Ice Miller LLP
1735 Market St., Suite 3900
Philadelphia, PA 19103
Telephone: (215) 377-5030
Facsimile: (215) 377-5031

Kenneth Sheehan
Ice Miller LLP
200 Massachusetts Ave NW
Suite 400
Washington, DC 20001
Telephone: (202) 807-4055
Facsimile: (202) 807-4056
Email: RohrerITC@icemiller.com

Counsel for Respondents Rohrer Aesthetics, Inc. and Rohrer Aesthetics, LLC

/s/ Richard V. Wells
Richard V. Wells
Christine M. Streatfeild
Graham Cronogue
BAKER & MCKENZIE, LLP
815 Connecticut Ave. NW
Washington, D.C. 20006
Telephone: (202) 452-7000
Facsimile: (202) 452-7074

James S. Blank
BAKER & MCKENZIE, LLP
452 Fifth Avenue
New York, NY 10018
Telephone: (212) 626-4100
Facsimile: (212) 310-1600

Dorian Ojemen
BAKER & MCKENZIE, LLP
800 Capitol Street
Suite 2100
Houston, Texas 77002
Telephone: (713) 427-5000
Facsimile: (713) 427-5099

Aaron Lines
BAKER & MCKENZIE, LLP
1900 North Pearl Street, Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-3000
Facsimile: (214) 978-3099
Email:HOU-Lutronic-ITC@bakermckenzie.com

Counsel for Respondents Lutronic Corporation; Lutronic Aesthetics, Inc. a/k/a Lutronic, Inc.; and Lutronic, LLC

/s/ Steven J. Corr
Steven J. Corr
JONES DAY
555 South Flower Street
Fiftieth Floor
Los Angeles, CA 90071
Telephone: (213) 489-3939

Ryan B. McCrum
JONES DAY
901 Lakeside Avenue
Cleveland, OH 44114-1190
Telephone: (216) 586-3939

Yeah-Sil Moon
JONES DAY
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3939

Marlee R. Hartenstein
JONES DAY
500 Grant Street, Suite 4500
Pittsburgh, PA 15219-2514
Telephone: (412) 391-3939

Laura M. Kanouse
JONES DAY
1221 Peachtree Street, N.E., Suite 400
Atlanta, GA 30361-3580
Telephone: (404) 521-3939
Email: SHEnB-ITC-JD@jonesday.com

Counsel for Respondents Sung Hwan E&B Co., LTD. d/b/a SHEnB Co. LTD, Cartessa Aesthetics, LLC, and Aesthetics Biomedical, Inc.

CERTIFICATE OF SERVICE

I, Lesley McCall Grossberg, hereby certify that on May 24, 2023, copies of the foregoing **RESPONDENTS' NOTICE OF PRIOR ART** were filed and served, pursuant to Commission regulations, to the following interested parties as indicated:

The Honorable Lisa R. Barton Secretary to the Commission **U.S. INTERNATIONAL TRADE COMMISSION** 500 E. Street, SW, Room 112 Washington, DC 20436	Via EDIS
The Honorable MaryJoan McNamara **U.S. INTERNATIONAL TRADE COMMISSION** 500 E. Street, SW, Room 112 Washington, DC 20436	Via Email: McNamara337@usitc.gov
Aaron D. Rauh **OFFICE OF UNFAIR IMPORT INVESTIGATIONS** U.S. International Trade Commission 500 E Street, SW Washington, DC 20436	Via Email and BOX: Aaron.Rauh@usitc.gov
Kevin C. Wheeler Cecilia Sanabria Michael A. David **LATHAM & WATKINS LLP** 555 11th St. NW, Suite 1000 Washington, DC 200041304 Charles H. Sanders **LATHAM & WATKINS LLP** 200 Clarendon St. Boston, MA (617) 948-6000 *Counsel for Complainant Serendia, LLC*	Via Email: serendiaitc.lwteam@lw.com
Guy Yonay David A. Loewenstein Clyde A. Shuman Kyle Auteri **PEARL COHEN ZEDEK LATZER BARATZ LLP** 7 Times Square, 19th Fl. New York, New York 10036 *Counsel for Respondents EndyMed Medical, Ltd. and EndyMed Medical, Inc.*	Via Email: EndyMed@PearlCohen.com
Daniel E. Valencia Brian R. Nester	Via Email: COV-Ilooda-ITC@cov.com

W. Kiersten Choi Daniel J. Farnoly Yong Joon Kwon **COVINGTON & BURLING LLP** One CityCenter, 850 Tenth Street, NW Washington, DC 20001 Robert T. Haslam Anupam Sharma **COVINGTON & BURLING LLP** 1999 Avenue of the Stars Los Angeles, CA 90067 *Counsel for Respondents Ilooda Co., Ltd. and Cutera, Inc.*	
David M. Airan Brian C. Rupp James W. Sanner **LEYDIG, VOIT & MAYER, LTD.** Two Prudential Plaza 180 N. Stetson Ave, Suite 4900 Chicago, IL 60601 Paul M. Bartkowski BARTKOWSKI PLLC 6803 Whittier Ave., Suite 200A McLean, VA 22101 *Counsel for Respondent Jeisys Medical Inc. and Cynosure, LLC*	Via Email: Leydig-Jeisys-ITC@leydig.com Jeisys-337@bartkowskipllc.com
Richard V. Wells Christine M. Streatfeild Graham R. Cronogue **BAKER & MCKENZIE, LLP** 815 Connecticut Ave. NW Washington, DC 20006 James S. Blank **BAKER & MCKENZIE, LLP** 452 Fifth Avenue New York, NY 10018 Shima Roy **BAKER & MCKENZIE, LLP** 300 East Randolph Street Suite 5000 Chicago, Illinois 60601 Dorian Ojemen **BAKER & MCKENZIE, LLP** 800 Capitol Street Suite 2100 Houston, Texas 77002 Aaron Lines **BAKER & MCKENZIE, LLP**	Via Email: HOU-Lutronic-ITC@bakermckenzie.com

1900 North Pearl Street, Suite 1500 Dallas, Texas 75201 *Counsel for Respondents Lutronic Corporation; Lutronic Aesthetics, Inc. aka Lutronic, Inc.; Lutronic, LLC*	
Ryan B. McCrum **JONES DAY** 901 Lakeside Avenue Cleveland, OH 44114 Yeah-Sil Moon **JONES DAY** 250 Vesey Street New York, New York 10281 Steven J. Corr **JONES DAY** 555 South Flower Street Fiftieth Floor Los Angeles, CA 90071 Marlee R. Hartenstein **JONES DAY** 500 Grant Street, Suite 4500 Pittsburgh, PA 15219-2514 Laura M. Kanouse **JONES DAY** 1221 Peachtree Street, N.E. Suite 400 Atlanta, GA 30361-3580 *Counsel for Respondents Sung Hwan E&B Co., LTD. d/b/a SHEnB Co. LTD; Respondent Cartessa Aesthetics, LLC and Aesthetics Biomedical, Inc.*	Via Email: SHEnB-ITC-JD@jonesday.com

/s/ Lesley McCall Grossberg
Lesley McCall Grossberg