

EXHIBIT 7

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U.S. Patent No. 11,351,356 Claim	Abbott's '356 Accused Methods¹
1. A method for assisting the blood circulation of a heart in a body, comprising:	On information and belief, Abbott has performed within the United States, and is performing within the United States, methods for assisting the blood circulation of a heart in a body that infringe one or more claims of the '356 patent (the "'356 Accused Methods"). Abbott's '356 Accused Methods include, but are not necessarily limited to, the implantation and assembly of Abbott's HeartMate 3 LVAS products ("HeartMate 3")², and any other Abbott products and services, either alone or in combination, that operate in a reasonably similar manner. On information and belief, Abbott has performed the '356 Accused Methods at least while developing, testing, and/or demonstrating these products. Also, on information and belief, third parties (including doctors and other healthcare professionals) have also implanted and assembled the HeartMate 3 products such that they performed the '356 Accused Methods within the United States. For example, and to the extent that Abbott argues that the preamble is a limitation, the HeartMate 3 products are configured to be implanted and assembled such that Abbott and others (including the third parties as set forth above) perform a method for assisting the blood circulation of a heart in a body, as recited by claim 1. As shown in the exemplary images below from Abbott's documentation for the HeartMate 3 products, the HeartMate 3 is configured such that when implanted and assembled, it "assumes some or all of the workload of the left ventricle" to assist the heart in circulating blood.

¹ These allegations are exemplary. Discovery from Abbott has not yet begun, and may uncover additional methods that infringe the '356 patent literally or under the doctrine of equivalents. The Court has also not yet construed any terms from any claims of the '356 patent. Thus, Plaintiff reserves the right to supplement these allegations as the case progresses through discovery and the claim construction process.

² The claim chart herein cites to exemplary evidence regarding Abbott's HeartMate 3 products, as exemplary products that Abbott and others have implanted and assembled to perform Abbott's '356 Accused Methods.

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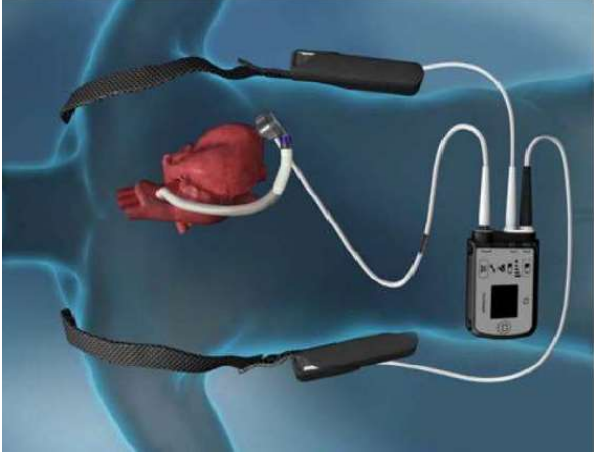
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	Overview The HeartMate 3™ Left Ventricular Assist System (LVAS) is a set of equipment and materials that together comprise a medical device designed to provide therapeutic benefit to those affected with advanced heart failure. In service, the LVAS assumes some or all of the workload of the left ventricle, thereby restoring the patient's systemic perfusion while palliating the underlying pathology. The LVAS features a Left Ventricular Assist Device (LVAD), a blood pump intended for long-term implantation in such patients, an extracorporeal Controller, plus all of the features, controls, attachments, interfaces, power sources, supporting equipment, labeling, and tools required to achieve the desired therapeutic benefit. The HeartMate 3 Left Ventricular Assist System is intended for use inside or outside the hospital, or for transportation of LVAD patients via ground ambulance, airplane, or helicopter. 

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	Exemplary Sources³: “HeartMate 3™ Left Ventricular Assist System Instructions for Use” at pages marked “[3]” – available for download at https://manuals.sjm.com/Search-Form?re=North-America&cc=US&ln=EN&ct=professional&qry=heartmate&ipp=10⁴ via https://manuals.sjm.com/~media/manuals/product-manual-pdfs/5/7/571a1818-2da2-4c1a-b454-f6f5a3bc39b6.pdf. <i>See also</i> the evidence and analysis for the claim elements discussed below.
delivering a heart assist pump device to the heart so that a suction end of an inflow tube of the heart assist pump device is inserted into a ventricle of the heart while a magnetically driven rotor of the heart assist pump device is positioned outside the ventricle of the heart,	On information and belief, Abbott and others (including third parties such as doctors and other healthcare professionals) have delivered a heart assist pump device to the heart so that a suction end of an inflow tube of the heart assist pump device is inserted into a ventricle of the heart while a magnetically driven rotor of the heart assist pump device is positioned outside the ventricle of the heart. For example, the HeartMate 3 products include a Left Ventricular Assist Device (LVAD), a heart assist pump device configured to be delivered to a heart. And on information and belief, Abbott and others have implanted the HeartMate 3's LVAD heart assist pump device such that it is delivered to patients' hearts, as shown in the exemplary annotated⁵ image below:

³ The sources identified herein are merely exemplary.

⁴ All hyperlinks cited herein were last accessed 20 November, 2023.

⁵ All annotations in black text boxes herein have been added by Plaintiff, to supplement the existing annotations (if any).

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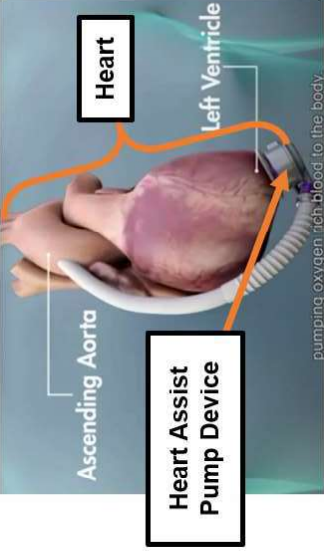
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	 Exemplary Source: Video titled “HeartMate 3 LVAD Patient Education Program – (2) System Overview,” available at https://www.youtube.com/watch?v=hmmplKzmKe0. On information and belief, Abbott and others have implanted the HeartMate 3’s LVAD heart assist pump device such that a suction end of an inflow tube, which Abbott calls an inflow cannula, is inserted into left ventricles of patients’ hearts. Also, on information and belief, while the inflow tube is inserted into a patient’s left ventricle, a magnetically driven rotor is positioned outside the ventricle. For example, the annotated image below shows the relative positions of the HeartMate 3 heart assist pump device’s inflow tube and magnetically driven rotor.

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	The diagram illustrates the internal components and blood flow of the HeartMate 3 ventricular assist device. On the left, a red arrow labeled 'Flow from left ventricle' enters the 'Suction End' of the 'Inflow Tube'. The tube has a 'Textured surface' and leads to a 'Rotor' assembly. The rotor is shown with a 'Full MagLev™' (magnetically levitated) design, featuring a 'Rotor' and a 'Magnetically Driven Rotor' with '~0.5mm sides'. The rotor is connected to an 'Electromagnetic motor'. Blood flow continues from the rotor through the 'Outflow to aorta' port. A 'Magnetic field' is indicated by blue lines around the rotor. The rotor is also labeled with '~1.0mm top and bottom' dimensions. Exemplary Source: Figure 1 from “HeartMate 3 in Lowest INTERMACS Profile Cohort: The Swiss Experience,” available at https://www.researchgate.net/publication/317276467_HeartMate_3_in_Lowest_INTERMACS_Profile_Cohort_The_Swiss_Experience. See <i>also</i> the evidence and analysis for the Preamble above and the other claim elements discussed herein.

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wherein the magnetically driven rotor is axially aligned with the inflow tube and is rotatable within a surrounding rotor housing of the heart assist pump device to act upon blood flowing from the inflow tube toward the magnetically driven rotor, the magnetically driven rotor being the magnetically driven rotor being rotatable about a central axis and being rigidly coupled to a first magnetic device that is located within the surrounding rotor housing at a position axially adjacent to the magnetically driven rotor,	On information and belief, Abbott and others (including third parties such as doctors and other healthcare professionals) have delivered a heart assist pump device to the heart such that the magnetically driven rotor is axially aligned with the inflow tube and is rotatable within a surrounding rotor housing of the heart assist pump device to act upon blood flowing from the inflow tube toward the magnetically driven rotor, the magnetically driven rotor being rotatable about a central axis and being rigidly coupled to a first magnetic device that is located within the surrounding rotor housing at a position axially adjacent to the magnetically driven rotor. For example, the magnetically driven rotor of the HeartMate 3 heart assist pump device has a central axis that is configured to be axially aligned with the inflow tube, which Abbott calls the inflow cannula. Further, the magnetically driven rotor is rotatable within its surrounding housing about this central axis, and is configured to act upon blood flowing from the inflow tube toward the rotor. Also, the magnetically driven rotor is rigidly coupled to a first magnetic device, as shown in the exemplary annotated image below.

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	The diagram illustrates a heart pump device with a central axis. An inflow tube enters from the left, leading into a first magnetic device. The flow then enters a gap between two rotors. The first rotor is labeled 'Full MagLev Flow Technology Pump' and features 'Large consistent blood flow pathways to reduce shear stress'. The second rotor is labeled 'Hydrodynamic Bearing Pump' and features 'Narrow blood flow pathways'. The rotors are surrounded by a 'Surrounding Rotor Housing'. The flow exits through a gap between the rotors, labeled '8 STACKED RED BLOOD CELLS²'. A 'Magnetically Driven Rotor' is also shown. The diagram includes labels for 'Central Axis', 'Inflow Tube', 'First Magnetic Device', 'Magnetically Driven Rotor', 'Surrounding Rotor Housing', 'Full MagLev Flow Technology Pump', 'Hydrodynamic Bearing Pump', 'Narrow blood flow pathways', 'Large consistent blood flow pathways to reduce shear stress', 'GAP', 'V.S.', '167 STACKED RED BLOOD CELLS²', and '8 STACKED RED BLOOD CELLS²'. Exemplary Source: HeartMate 3 Website at https://www.cardiovascular.abbott/us/en/hcp/products/heart-failure/left-ventricular-assist-devices/heartmate-3/about.html. See <i>also</i> the evidence and analysis for the Preamble above and the other claim elements discussed herein.

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wherein the heart assist pump device further includes: a second magnetic device axially aligned with the inflow tube and positioned to magnetically drive rotation of the magnetically driven rotor via a magneto coupling with the first magnetic device while being spaced apart and sealed from both the magnetically driven rotor and the first magnetic device.	The heart assist pump device further includes a second magnetic device axially aligned with the inflow tube and positioned to magnetically drive rotation of the magnetically driven rotor via a magneto coupling with the first magnetic device while being spaced apart and sealed from both the magnetically driven rotor and the first magnetic device. For example, the HeartMate 3 heart assist pump device includes a second magnetic device which Abbott calls a Motor, Stator, and/or MagLev Flow technology. This second magnetic device is configured to be aligned with an axis of the inflow tube, and is positioned to magnetically drive the magnetically driven rotor to rotate via a magneto coupling with the first magnetic device. Further, the second magnetic device is configured to be spaced apart and sealed from the magnetically driven rotor and first magnetic device, as shown in the exemplary annotated image below.

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	The diagram illustrates the internal structure of the HeartMate 3 ventricular assist device. It features a central axis with an inflow tube at the top. Below the inflow tube are two magnetic devices: a 'First Magnetic Device' and a 'Second Magnetic Device'. These are situated within a 'Magnetically Driven Rotor' assembly, which is housed within a 'Surrounding Rotor Housing'. The rotor housing contains 'STACKED RED BLOOD CELLS²'. The diagram also shows 'GAP' regions between the rotor and the housing. Two circular insets provide a closer look at the rotor's internal structure: the top inset is labeled 'Full MagLev Flow Technology Pump' and describes 'Large consistent blood flow pathways to reduce shear stress'; the bottom inset is labeled 'Hydrodynamic Bearing Pump' and describes 'Narrow blood flow pathways'. A comparison is made between the two, with '167' and '8' indicating the number of blood cells in the respective flow paths. A 'Central Axis' label points to the central shaft of the device. Exemplary Source: HeartMate 3 Website at https://www.cardiovascular.abbott/us/en/hcp/products/heart-failure/left-ventricular-assist-devices/heartmate-3/about.html.

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and a blood outflow port positioned radially adjacent the magnetically driven rotor such that blood driven by the magnetically driven rotor is configured to exit the surrounding rotor housing in a direction substantially perpendicular from the inflow tube path and the central axis of the magnetically driven rotor,	Exemplary Source: Video titled “HeartMate 3 LVAD Peer-to-Peer Video Presentation” at https://youtu.be/_C-K-DCINbI. See <i>also</i> the evidence and analysis for the Preamble above and the other claim elements discussed herein.
and a blood outflow port positioned radially adjacent the magnetically driven rotor such that blood driven by the magnetically driven rotor is configured to exit the surrounding rotor housing in a direction substantially perpendicular from the inflow tube path and the central axis of the magnetically driven rotor,	The heart assist pump device further includes a blood outflow port positioned radially adjacent the magnetically driven rotor such that blood driven by the magnetically driven rotor is configured to exit the surrounding rotor housing in a direction substantially perpendicular from the inflow tube path and the central axis of the magnetically driven rotor. For example, the HeartMate 3’s heart assist pump device includes a port for blood outflow to the aorta, as shown in the annotated image below. This port is radially adjacent to the magnetically driven rotor, such that blood driven by the rotor is configured to exit the housing through the port in a direction substantially perpendicular

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	from the inflow path for the inflow cannula. This outflow direction is also substantially perpendicular to the central axis of the magnetically driven rotor, as its central axis is substantially parallel to the inflow path for the inflow cannula. The diagram illustrates the internal components and flow path of the HeartMate 3 ventricular assist device. It shows a cross-section of the device with a central axis running through the center. The inflow path is shown entering from the left, passing through a textured surface and an inflow tube. The rotor is shown in the center, with a full MagLev™ (magnetically levitated) rotor assembly. The outflow port is shown on the right, with an outflow tube leading to the aorta. The diagram also shows the electromagnet motor and the magnetically driven rotor. Dimensions are provided: ~1.0mm top and bottom, and ~0.5mm sides. Labels include: Central Axis, Inflow Tube Path, Inflow Tube, Inflow cannula, Flow from left ventricle, Textured surface, Rotor, Full MagLev™, Electromagnetic motor, Outflow to aorta, Blood Outflow Port, and Magnetically Driven Rotor. Exemplary Source: Figure 1 from “HeartMate 3 in Lowest INTERMACS Profile Cohort: The Swiss Experience,” available at https://www.researchgate.net/publication/317276467_HeartMate_3_in_Lowest_INTERMACS_Profile_Cohort_The_Swiss_Experience. See also the evidence and analysis for the Preamble above and for the other claim elements discussed herein.

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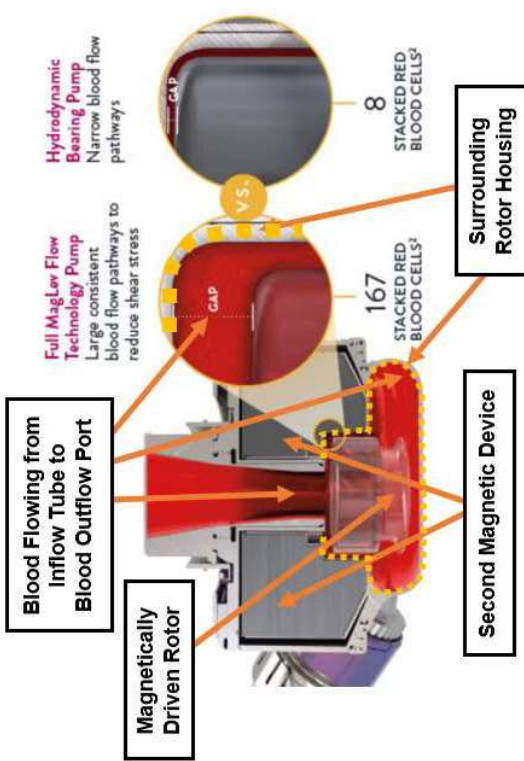
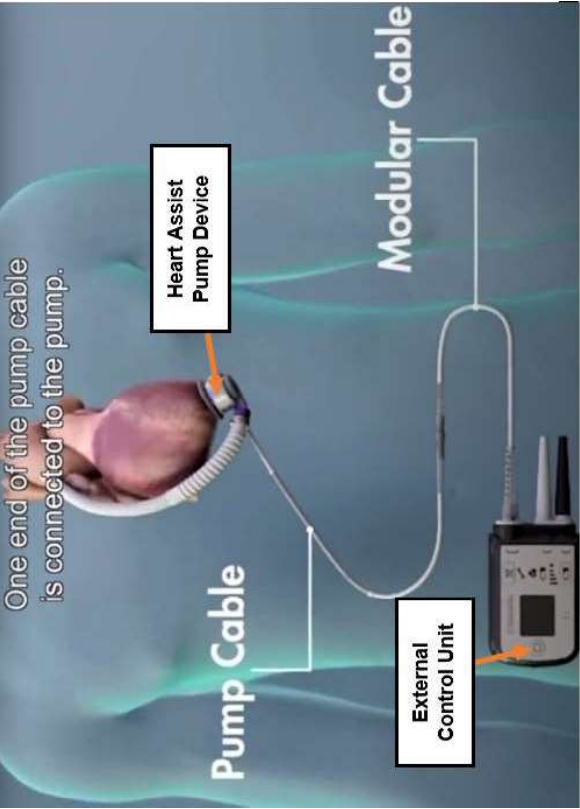
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wherein the magneto coupling orients the magnetically driven rotor so that, in response to rotation of the magnetically driven rotor, the magnetically driven rotor remains entirely spaced apart from the surrounding rotor housing by the blood flowing from the inflow tube and to the blood outflow port;	On information and belief, Abbott and others (including third parties such as doctors and other healthcare professionals) have delivered the heart assist pump device to the heart such that the magneto coupling orients the magnetically driven rotor so that, in response to rotation of the magnetically driven rotor, the magnetically driven rotor remains entirely spaced apart from the surrounding rotor housing by the blood flowing from the inflow tube and to the blood outflow port. For example, the second magnetic device of the HeartMate 3 (which Abbott calls a Motor, Stator, and/or MagLev Flow Technology) is configured to orient the magnetically driven rotor in its housing via the magneto coupling between the second magnetic device and the first magnetic device. And in response to rotation of the magnetically driven rotor, the second magnetic device orients the rotor so that it remains entirely spaced apart from the surrounding rotor housing by the blood flowing from the inflow cannula to the outflow port that leads to the aorta.  The diagram illustrates the internal components of a heart assist pump. A central 'Magnetically Driven Rotor' is shown within a 'Surrounding Rotor Housing'. A 'Second Magnetic Device' is positioned to orient the rotor. Red arrows indicate 'Blood Flowing from Inflow Tube to Blood Outflow Port'. Two cross-sectional views are provided: one labeled 'Full MagLev Flow Technology Pump' showing 'Large consistent blood flow pathways to reduce shear stress' with a 'GAP' between the rotor and housing, and another labeled 'Hydrodynamic Bearing Pump' showing 'Narrow blood flow pathways' with a 'GAP' and 'YS' marking. Numerical values '167' and '8' are associated with the rotor and housing respectively, with a note 'STACKED RED BLOOD CELLS'.

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	Exemplary Sources: HeartMate 3 Website at https://www.cardiovascular.abbott/us/en/hcp/products/heart-failure/left-ventricular-assist-devices/heartmate-3/about.html; <i>see also</i> video titled “Abbott’s HeartMate 3 LVAD,” available at https://www.youtube.com/watch?app=desktop&v=IbHN8e_OGJw; video titled “HeartMate 3 LVAD Peer-to-Peer Video Presentation” at https://youtu.be/_C-K-DCINbI. <i>See also</i> the evidence and analysis for the Preamble above and the other claim elements discussed herein.
and connecting an external control unit to the heart assist pump device for regulating operation of the second magnetic device to thereby magnetically drive the rotation of the magnetically driven rotor via the magneto coupling with the first magnetic device, the external control unit being positioned exterior to the body while the inflow tube of the heart assist pump device is in the heart.	On information and belief, Abbott and others (including third parties such as doctors and other healthcare professionals) have connected an external control unit to the heart assist pump device for regulating operation of the second magnetic device to thereby magnetically drive the rotation of the magnetically driven rotor via the magneto coupling with the first magnetic device, the external control unit being positioned exterior to the body while the inflow tube of the heart assist pump device is in the heart. For example, Abbott’s HeartMate 3 products are configured to be implanted and assembled such that an external control unit, which Abbott calls the system controller, is connected to the heart assist pump device, which Abbott calls the HeartMate 3 LVAD. When connected, this external control unit is configured to control the heart assist pump device and drive the rotation of the magnetically driven rotor as discussed above. The external control unit is configured to be connected such that it is positioned exterior to the body while the inflow tube of the heart assist pump device is in the heart.

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	 The diagram illustrates the HeartMate 3 LVAD system. A human torso is shown with a heart. A pump cable is connected to the heart. The pump cable is connected to a heart assist pump device. The heart assist pump device is connected to an external control unit via a modular cable. Labels include: Pump Cable, Heart Assist Pump Device, External Control Unit, and Modular Cable. A text box states: 'One end of the pump cable is connected to the pump.' Exemplary Source: Video titled “HeartMate 3 LVAD Patient Education Program – (2) System Overview,” available at https://www.youtube.com/watch?v=hmmpIKzmKe0; see also “HeartMate 3™ Left Ventricular Assist System Instructions for Use” at pages marked “1-3” and “1-10” – available for download at https://manuals.sjm.com/Search-Form?re=North-America&cc=US&ln=EN&ct=professional&qry=heartmate&jpp=10 via https://manuals.sjm.com/~media/manuals/product-manual-pdfs/5/7/571a1818-2da2-4c1a-b454-f6f5a3bc39b6.pdf. See <i>also</i> the evidence and analysis for the Preamble above and the other claim elements discussed herein.