

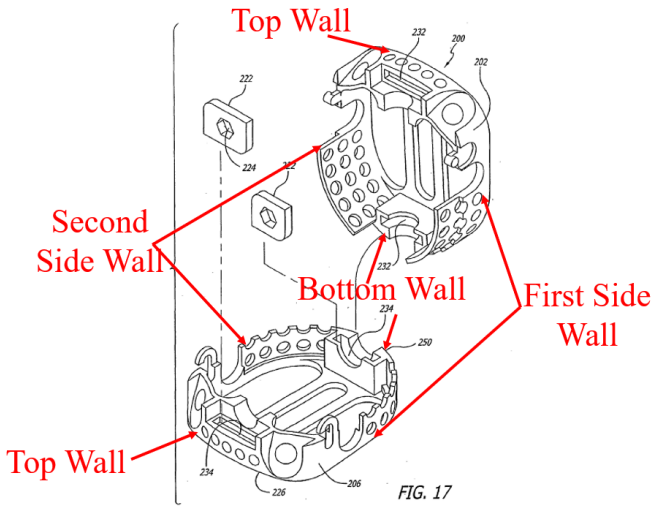
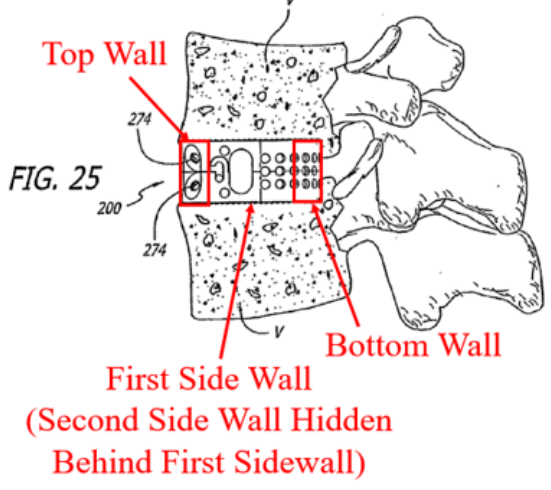
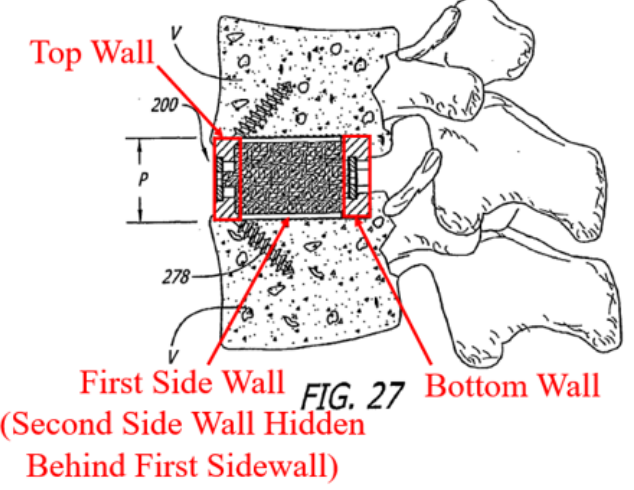
Exhibit E1 – Invalidity of U.S. Patent No. 10,238,505 in view of Michelson and Coates

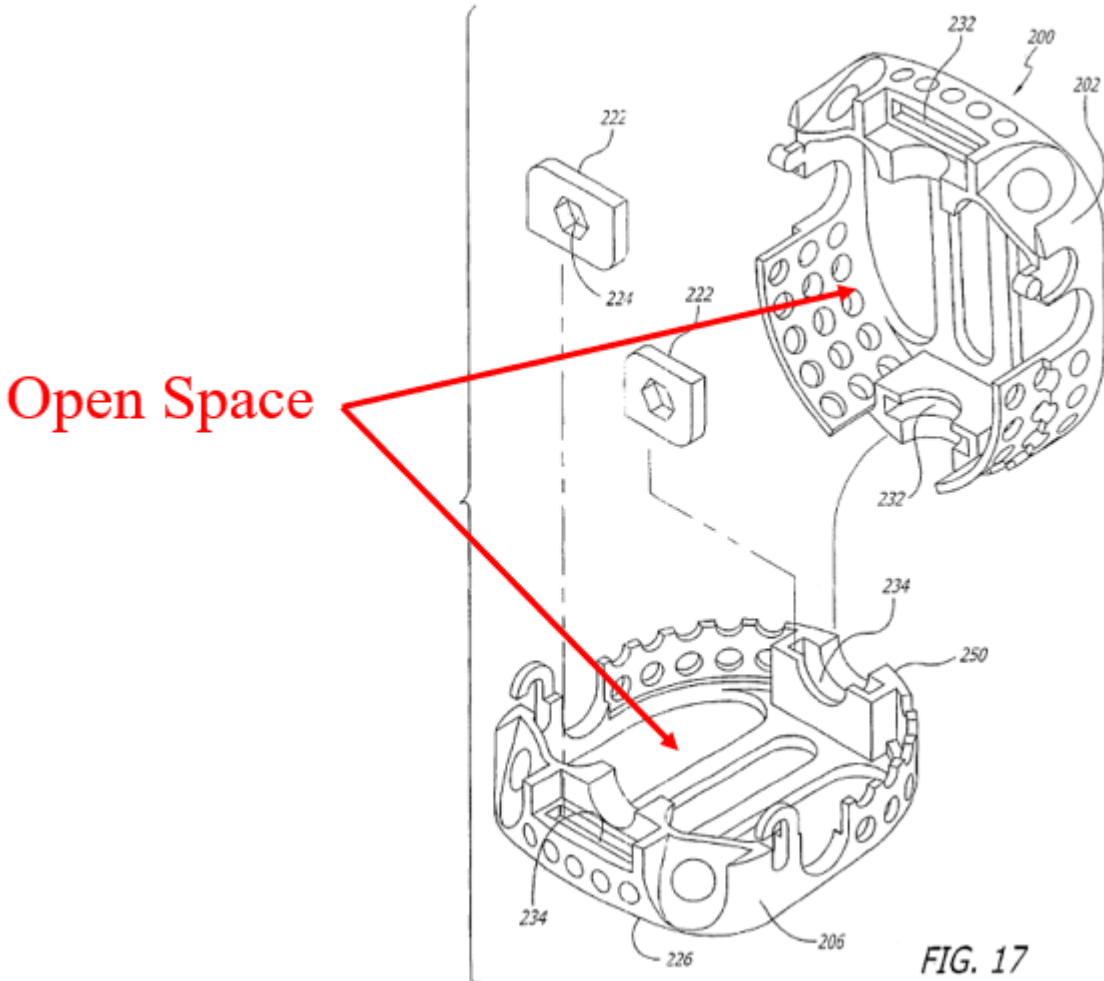
U.S. Patent Application Publication No. 2003/0208275 A1 to Michelson (“Michelson”), alone or in combination with U.S. Patent No. 5,423,826 to Coates et al. (“Coates”), alone or in combination with other prior art identified in the cover pleading and/or discussed below, disclose(s) or render(s) claims 1, 2, 4, 5, 6, 7, 8, 9, 14, 15, 16, 17, 19 and 20 of U.S. Patent No. 10,238,505 (“’505 Patent”) obvious. Moskowitz has claimed a March 24, 2008 priority date for the ’505 Patent. *See* Moskowitz First Supplemental Response to Medtronic Interrogatory 1. Michelson published on November 6, 2003. Michelson is therefore prior art under pre-AIA § 102(b). (Michelson also issued on April 6, 2004 from an application filed April 23, 2002, and is therefore prior art under pre-AIA §§ 102(a) and (e) under any earlier priority date Moskowitz may claim.) Coates issued on June 13, 1995, and is therefore prior art under pre-AIA § 102(b). Nothing in this chart should be construed as an admission of infringement or the correctness of Moskowitz’s interpretation of the claims as reflected in the infringement contentions.

Claims	Exemplary Citations to Prior Art
Claim 1	
[1A] An intervertebral combination internal screw guide and fixation apparatus configured to be inserted into a disc space between a first vertebral body and a second vertebral body and to provide fusion of the first vertebral body to the second vertebral body via biological bone fusion and screw fusion, the apparatus comprising:	To the extent the preamble is limiting, Michelson discloses this limitation. According to Michelson, “[s]hown in FIGS. 17-28, in accordance with the present invention, as embodied and broadly described herein, is an embodiment of an expandable push-in artificial <i>interbody spinal fusion implant</i> 200 for anterior insertion <i>across a disc space D between two adjacent vertebral bodies V of a human spine.</i>” Michelson at 18:56-61. Thus, Michelson discloses an “intervertebral [] apparatus configured to be inserted into a disc space between a first vertebral body and a second vertebral body and to provide fusion of the first vertebral body to the second vertebral body.” As shown below, figure 17 depicts a perspective view of Michelson’s interbody spinal fusion implant 200 with upper member 202 and lower member 206, figure 25 depicts a cross-sectional side view of the implant 200 inserted into the disc space, and figure 27 depicts the implant 200 in its final deployed position in the disc space with bone screws 278 installed to anchor the implant to the two adjacent vertebral bodies V. <i>Id.</i> at 9:43-44, 10:1-4, 10:11-16, 18:56-66, 19:56-61.

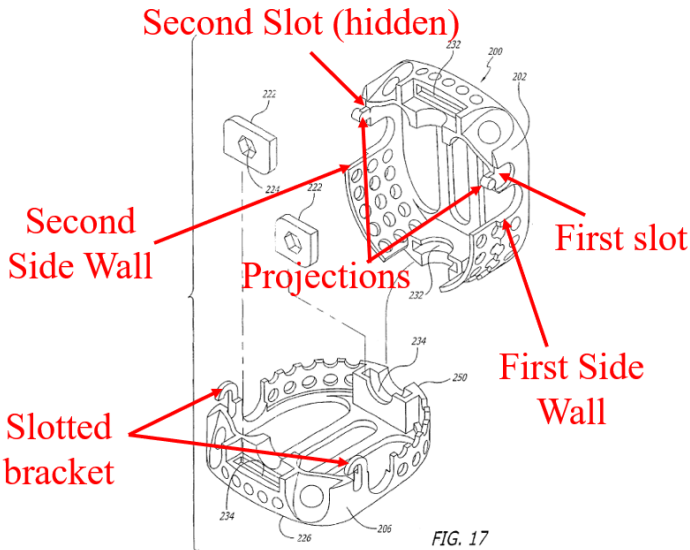
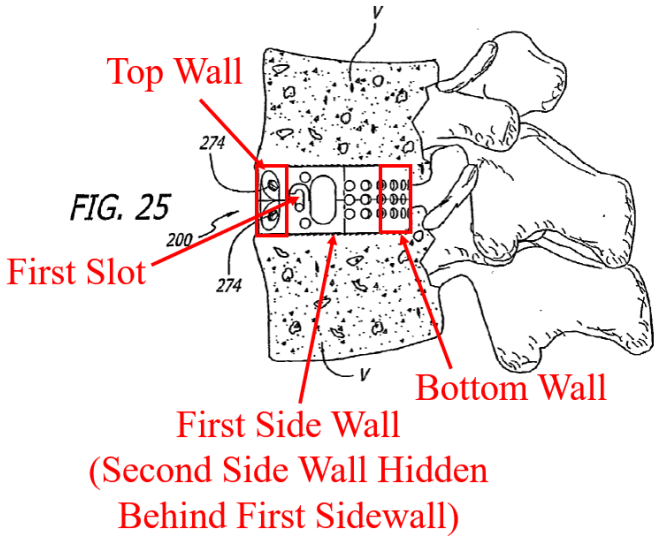
Claims	Exemplary Citations to Prior Art
	<i>Id.</i> at Figs. 17, 25, 27. As shown in the figures above, bone screws 278 are inserted through screw holes 274 in the implant 200, which are “adapted to receive” the screws 278, <i>i.e.</i>, screw holes 274 serve as “internal screw guide[s]” and the screws 278 serve as a “fixation” mechanism to anchor the implant 200. <i>Id.</i> at 19:56-61; <i>see also id.</i> at 7:63-8:9.) Thus, Michelson discloses an “[a]n intervertebral combination internal screw guide and fixation apparatus.” Moreover, as shown in the figures above, the upper and lower members 202, 206 have openings “for permitting for the growth of bone from a vertebral body to an adjacent vertebral body through the implant.” <i>Id.</i> at 2:12-16, 4:9-17. When upper and lower members 202, 206 are closed for insertion of implant 200 into the disc space, the outer walls of these members 202, 206 form a hollow space inside the implant, which is “packed with bone or other fusion-promoting substances.” <i>Id.</i> at 5:13-34, 18:45-50; <i>see also id.</i> at 13:47-62 (describing similar hollow space in implant 100 of figure 1 embodiment).

Claims	Exemplary Citations to Prior Art
	Michelson thus discloses “[a]n intervertebral combination internal screw guide and fixation apparatus configured . . . to provide fusion of the first vertebral body to the second vertebral body via biological bone fusion and screw fusion,” as Michelson’s apparatus (<i>e.g.</i>, including implant 200, screws 278, and bone/fusion-promoting substances packed into the implant) fuses the adjacent vertebrae between the disc space by allowing for bone growth through the openings and hollow space in the implant and additionally by way of the bone screws 278 anchoring the implant. For the foregoing reasons, and additionally for the reasons discussed below with respect to limitations [1B]-[1K], Michelson discloses the preamble of claim 1, to the extent it is limiting. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[1B] an intervertebral spacer including a top wall, a bottom wall, and first and second sidewalls, wherein the intervertebral spacer defines: an open space between the top, bottom, first, and second sidewalls capable of receiving bone filling for biological bone fusion,	Michelson discloses “an intervertebral spacer including a top wall, a bottom wall, and first and second sidewalls[.]” As discussed as to claim limitation [1A], Michelson discloses an implant 200, which is an “intervertebral spacer” because it is inserted in a disc space between adjacent vertebrae. Michelson at 18:56-19:3. As shown in figures 17, 25, and 27 below, implant 200 includes “a top wall, a bottom wall, and first and second sidewalls[.]”

Claims	Exemplary Citations to Prior Art
	 FIG. 17  FIG. 25  FIG. 27 Michelson at Figs. 17, 25, 27 (all annotated); <i>see also id.</i> at 13:41-44. Michelson further discloses “wherein the intervertebral spacer defines: an open space between the top, bottom, first, and second sidewalls capable of receiving bone filling for biological bone fusion.” For

Claims	Exemplary Citations to Prior Art
	example, as discussed as to claim limitation [1A] and shown in figure 17 below, implant 200 defines a hollow space (“open space”) between “the top, bottom, first, and second sidewalls.” As also discussed as to claim limitation [1A], this hollow space is “packed with bone or other fusion-promoting substances,” <i>i.e.</i>, it is “capable of receiving bone filling for biological bone fusion.” <i>Id.</i> at 5:13-34, 18:45-50; <i>see also id.</i> at 13:47-62.  Open Space FIG. 17

Claims	Exemplary Citations to Prior Art
	<i>Id.</i> at Fig. 17 (annotated). For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[1C] a first slot on a first outer side of the first sidewall	Michelson discloses this limitation. For example, as shown in figures 17 and 25 below, implant 200 includes a first slot on an outer side of its first sidewall on the upper member 202, where the slot includes a projection extending radially. Michelson at 18:56-19:3. When the implant 200 is in a closed state, <i>i.e.</i>, upper member 202 and lower member 206 are in a collapsed position like that shown in figure 25, the projection of the first slot engages with a slotted bracket located on the lower member 206 such that the slotted bracket sits within the first slot. <i>Id.</i>; <i>see also id.</i> at 17:48-62 (explaining similar mechanism in figure 1 embodiment). The same slot-slotted bracket mechanism is provided in a corresponding position on the opposing side wall, <i>i.e.</i>, an outer surface of the second sidewall. <i>Id.</i>

Claims	Exemplary Citations to Prior Art
	 FIG. 17  FIG. 25

Claims	Exemplary Citations to Prior Art
	<i>Id.</i> at Figs. 17, 25 (annotated). For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[1D] a second slot on a second outer side of the second sidewall of the two sidewalls, wherein the second slot is positioned opposite of the first slot, wherein the first slot is positioned along a first centerline axis that bisects the first side wall and wherein the second slot is positioned along a second centerline axis that bisects the second side wall,	As described above with respect to claim limitation [1C], Michelson discloses “a second slot on a second outer side of the second sidewall of the two sidewalls, wherein the second slot is positioned opposite of the first slot.” Michelson also discloses “wherein the first slot is positioned along a first centerline axis that bisects the first side wall,” as shown in figure 21 below.

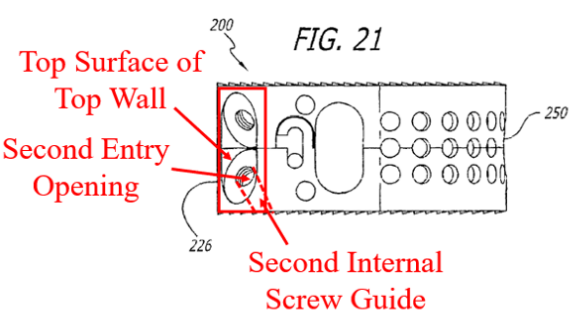
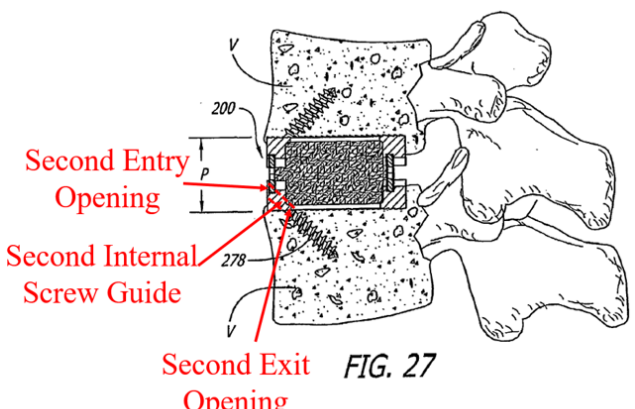
Claims	Exemplary Citations to Prior Art
	FIG. 21 First Centerline Axis First Slot First Side Wall (Second Side Wall Hidden Behind First Sidewall) 200 250 226 Michelson at Fig. 21. Similarly, a POSITA would have understood based on the depiction of implant 200 in figure 17 that “the second slot is positioned along a second centerline axis that bisects the second side wall,” because the positioning of the second slot on the second sidewall mirrors the position of the first slot on the first sidewall. For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.

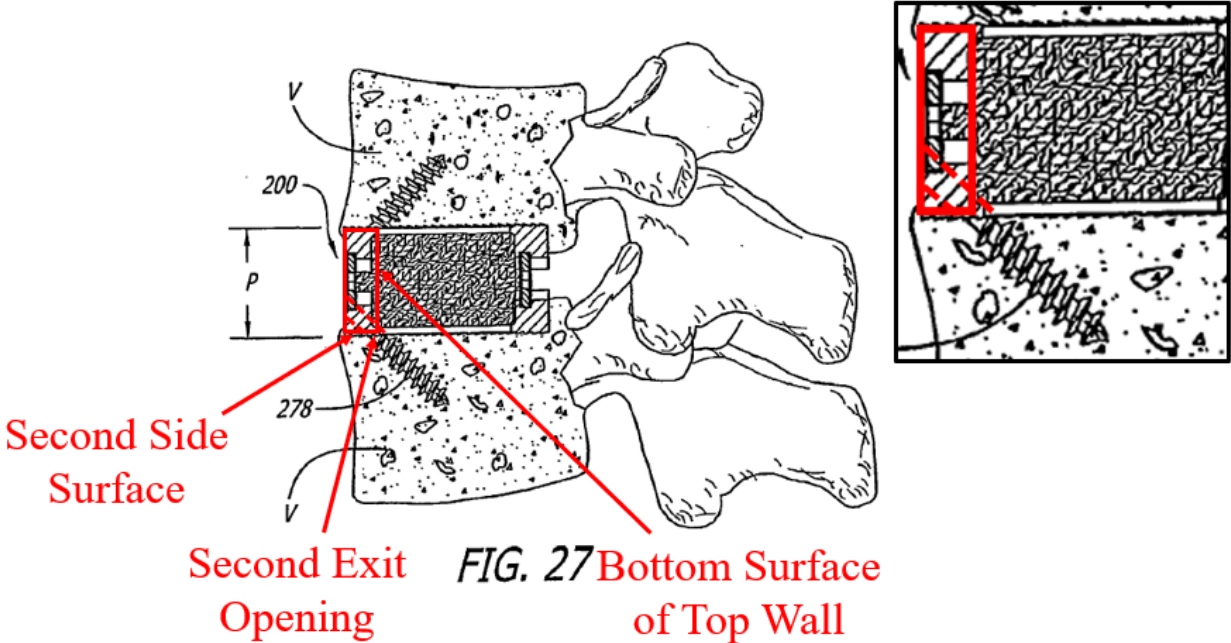
Claims	Exemplary Citations to Prior Art
[1E] a first internal screw guide having a first entry opening and a first exit opening, the first entry opening of the first internal screw guide formed at least partially in a top surface of the top wall and the first exit opening formed at least partially in a bottom surface of the top wall and at least partially in a first side surface of the top wall,	Michelson discloses this limitation. Michelson discloses that “[a]t least one and preferably both of the upper and lower members may have a <i>screw hole passing through the trailing end</i>, which preferably is adapted to receive a screw passing through the end of each of the upper and lower members and <i>from the interior of the implant through the upper and lower surfaces</i>, respectively, into each of the adjacent vertebral bodies to anchor the implant.” Michelson at 7:63-8:2. In this regard, as discussed above as to claim limitation [1A], and “as best shown in FIGS. 25-28, another aspect of implant 200 is that its upper and lower members 202, 206 have screw holes 274 passing therethrough adapted to receive a screw 278 passing from the interior of implant 200 into adjacent vertebral bodies V to anchor implant 200 to an adjacent vertebral body V.” <i>Id.</i> at 19:56-61. Each screw hole 274 is an “internal screw guide,” as it constrains and directs the screw through the implant and into the vertebral body. <i>See id.</i> As shown in figures 21 and 27 below, a first screw hole 274 is the “first internal screw guide having a first entry opening,” <i>i.e.</i>, the opening through which the bone screw 278 enters the implant 200. As shown in figure 27, the first screw hole 274 further includes “a first exit opening,” <i>i.e.</i>, the opening where screw 278 exits the implant 200. First Internal Screw Guide FIG. 21 First Entry Opening Top Surface of Top Wall 200 250 226

Claims	Exemplary Citations to Prior Art
	<i>Id.</i> at Figs. 21, 27 (both annotated). This limitation recites various surfaces of the top wall, namely “a top surface of the top wall,” “a bottom surface of the top wall,” and “a first side surface of the top wall” with reference to the locations where the first entry opening and first exit opening are formed. Michelson discloses these surfaces. As shown below in figures 21 and 27, the top wall includes “a top surface” corresponding to the surface of trailing end 226 of implant 200, “a bottom surface” opposing this top surface, “a first side surface” adjacent to the top and bottom surfaces on one side of the implant 200 and a second side surface adjacent to the top and bottom surfaces on the other side. <i>Id.</i> at 7:63-8:2, 19:56-61.

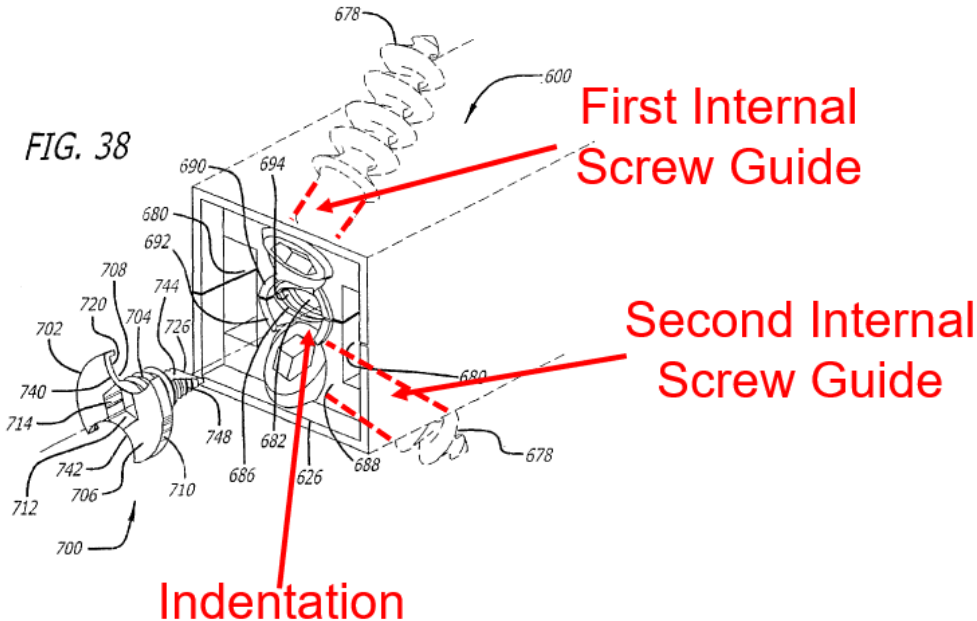
Claims	Exemplary Citations to Prior Art
	FIG. 21 First Side Surface Top Surface of Top Wall Bottom Surface of Top Wall Second Side Surface 200 250 226 FIG. 27 First Side Surface Top Surface of Top Wall Second Side Surface Bottom Surface of Top Wall 200 250 226 <i>Id.</i> at Figs. 21, 27 (both annotated). As shown in figure 21 below, the “first entry opening” of a first screw hole 274 (“first internal screw guide”) is “formed at least partially in a top surface of the top wall.” In other words, the screw 278 is inserted through the screw hole 274’s opening, which is formed on the surface of trailing end 226. <i>Id.</i> at 7:63-8:2, 19:56-61. FIG. 21 First Entry Opening Top Surface of Top Wall 200 250 226

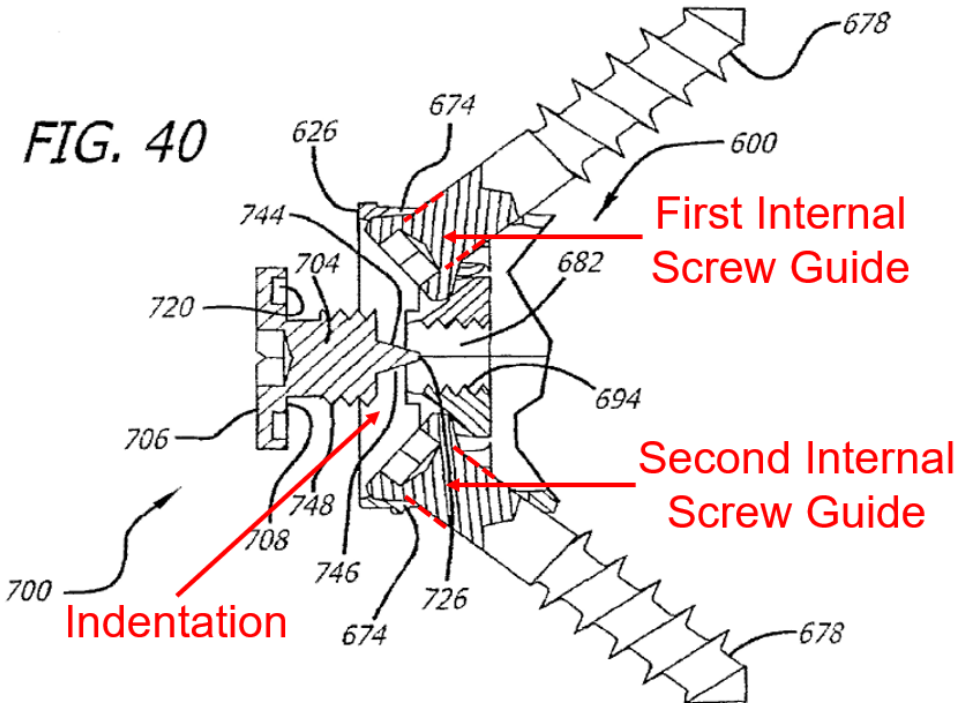
Claims	Exemplary Citations to Prior Art
	<i>Id.</i> at Fig. 21 (annotated). Moreover, as shown in figure 27 below (including an enlarged view of the relevant portion), the “first exit opening” of the first screw hole 274 cuts a surface directly opposing the leading end 226 surface, which is “a bottom surface of the top wall.” <i>Id.</i> at 7:63-8:2, 19:56-61. As also shown in figure 27 below, the “first exit opening” of the first screw hole 274 also cuts a side surface of the top wall, which is adjacent to the top and bottom surfaces on one side of the implant 200, <i>i.e.</i>, “a first side surface of the top wall.” <i>Id.</i> Thus, Michelson discloses that “the first exit opening formed at least partially in a bottom surface of the top wall and at least partially in a first side surface of the top wall.” FIG. 27 Bottom Surface of Top Wall <i>Id.</i> at Fig. 27 (annotated).

Claims	Exemplary Citations to Prior Art
	For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[1F] a second internal screw guide having a second entry opening and a second exit opening, the second entry opening of the second internal screw guide formed at least partially in the top surface of the top wall and the second exit opening formed at least partially in the bottom surface of the top wall and at least partially in a second side surface of the top wall so as to extend in a direction different than that of the first internal screw guide,	Michelson discloses this limitation for at least reasons similar to those given above for limitation [1E]. For example, as discussed with respect to that claim limitation, “upper and lower members 202, 206 [of implant 200] have screw holes 274 passing therethrough adapted to receive a screw 278 passing from the interior of implant 200 into adjacent vertebral bodies V to anchor implant 200 to an adjacent vertebral body V.” Michelson at 19:56-61; <i>see also id.</i> at 7:63-8:2. As shown below in figures 21 and 27 below, a second screw hole 274 is “a second internal screw guide having a second entry opening and a second exit opening.” As also shown in figure 21 below, the “second entry opening” of this second screw hole is “formed at least partially in the top surface of the top wall.”  FIG. 21  FIG. 27 <i>Id.</i>, Figs. 21, 27 (both annotated). Moreover, as shown in figure 27 below (including an enlarged view of the relevant portion), the “second exit opening” of the second screw hole 274 cuts a surface directly opposing the leading end 226 surface, which is

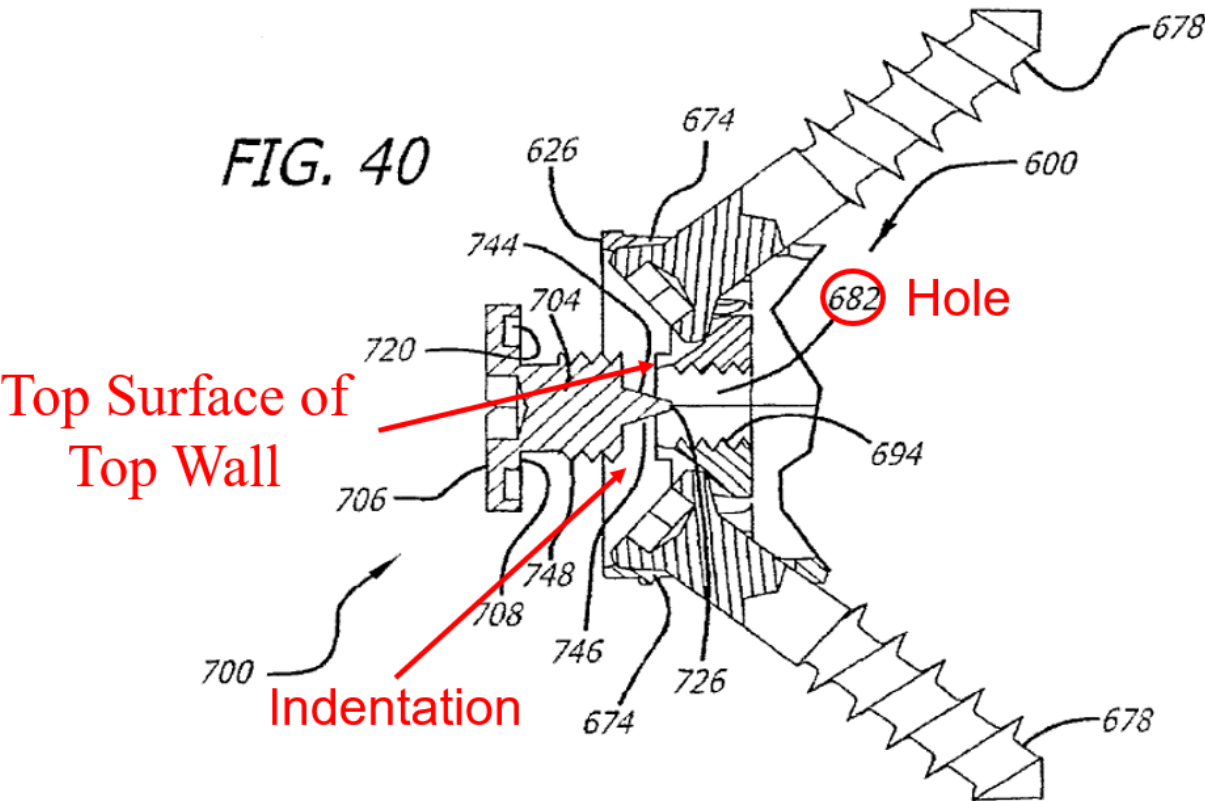
Claims	Exemplary Citations to Prior Art
	“a bottom surface of the top wall.” <i>Id.</i> at 7:63-8:2, 19:56-61. As also shown in figure 27 below, the “first exit opening” of the first screw hole 274 also cuts a side surface of the top wall, which is adjacent to the top and bottom surfaces on one side of the implant 200, <i>i.e.</i>, “a first side surface of the top wall.” <i>Id.</i> Thus, Michelson discloses that “the second exit opening formed at least partially in the bottom surface of the top wall and at least partially in a second side surface of the top wall so as to extend in a direction different than that of the first internal screw guide.”  FIG. 27 <i>Id.</i> at Fig. 27 (annotated). As also shown in the figures above, the second screw hole 274 (“second internal screw guide”) extends in a downward direction towards the bottom vertebral body while the first screw hole 274 (“first internal screw guide”) extends in an upward direction towards the top vertebral body. <i>Id.</i> at 7:63-8:2, 19:56-61.) Thus, the second exit opening of the second screw hole 274 is formed “so as to extend in a direction different than that of the first internal screw guide.”

Claims	Exemplary Citations to Prior Art
	For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[1G] an indentation in the top surface of the top wall extending between at least a portion of the first internal screw guide and the second internal screw guide, and	Michelson discloses and/or suggests this limitation. For example, as discussed above as to claim limitation [1A], Michelson discloses that implant 200 of the figure 17 embodiment discussed above is designed “for anterior insertion.” Michelson at 18:56-61. Michelson further discloses that “[a]n anterior approach implant may have a leading end, trailing end, or both ends that are adapted to engage a cap.” <i>Id.</i> at 18:45-50; <i>see also id.</i> at 18:29-44. Michelson does not, however, expressly describe the implant 200’s configuration with an end cap engaged on the trailing end (or leading end). As discussed below with respect to Claim 4, however, Michelson discusses an embodiment with such an end cap in figures 38-41. <i>Id.</i> at 23:65-24:14. Thus, given these related disclosures of Michelson, including a suggestion that the implant 200 may include an end cap on its trailing end surface, a POSITA would have considered the teachings of Michelson’s end cap embodiments such as those related to figures 38-41. As shown in figures 38 and 40 below, Michelson discloses the minor modifications needed on the trailing end surface of an implant 600 (“top surface of the top wall”) so it can be adapted to engage an end cap 700 with head 702 and stem 704. <i>Id.</i> at 23:65-24:14. As shown, implant 600’s trailing end surface includes an indentation between first and second internal screw guides, <i>i.e.</i>, “an indentation in the top surface of the top wall extending between at least a portion of the first internal screw guide and the second internal screw guide,” so stem 704 can pass through into an opening 682 in the implant and the head 702 can sit in the indentation. <i>Id.</i> at 24:5-31. The indentation includes an opening 682 extending into the top wall of the implant so stem 704 can be inserted in the implant. <i>Id.</i>

Claims	Exemplary Citations to Prior Art
	FIG. 38  First Internal Screw Guide Second Internal Screw Guide Indentation

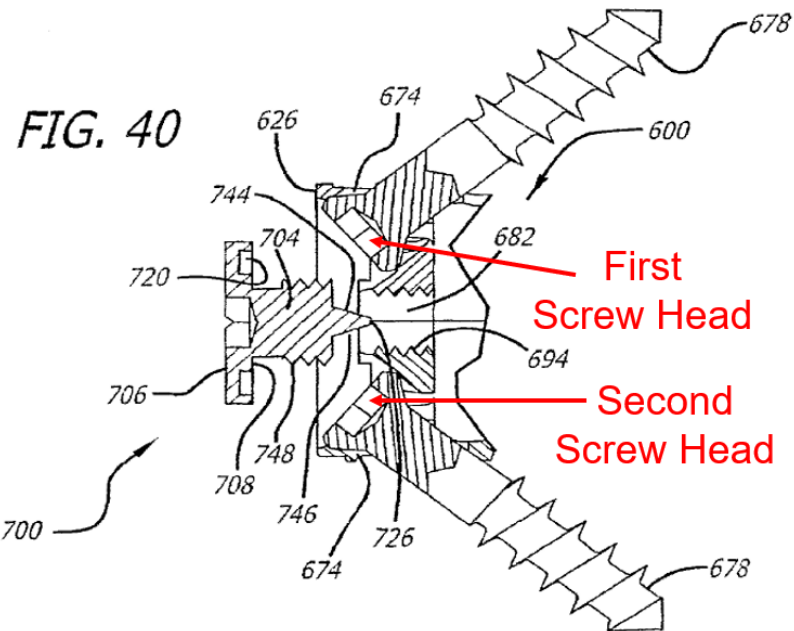
Claims	Exemplary Citations to Prior Art
	FIG. 40  First Internal Screw Guide Second Internal Screw Guide Indentation Michelson at Figs, 38, 30 (both annotated). A POSITA would have recognized that the relevant structure of implant 200 of figure 17 and implant 600 of figure 38 is generally the same except for the indentation for the end cap. For example, the trailing ends of both implants 200 and 600 include entry openings leading into screw holes, where at least one screw hole is oriented towards a top vertebral body and at least one screw hole is oriented towards a bottom vertebral body. <i>Id.</i> Thus, a POSITA would have been motivated to modify Michelson’s implant 200, which does not expressly show an area between the screw holes 274 for introducing an end cap, such that the surface of its trailing end 226 would have been adapted to engage an end cap such as end cap 700 shown above. Indeed, as noted above, Michelson itself expressly suggests such a modification: “An anterior approach implant may have a leading end, trailing end, or both ends that are adapted to engage a cap.” <i>Id.</i> at 18:45-50. Moreover, based on the disclosure in Michelson itself, a POSITA would have recognized that by adding an end cap on the trailing end of implant 200, the end cap would have provided several benefits, including “(1) expand[ing]

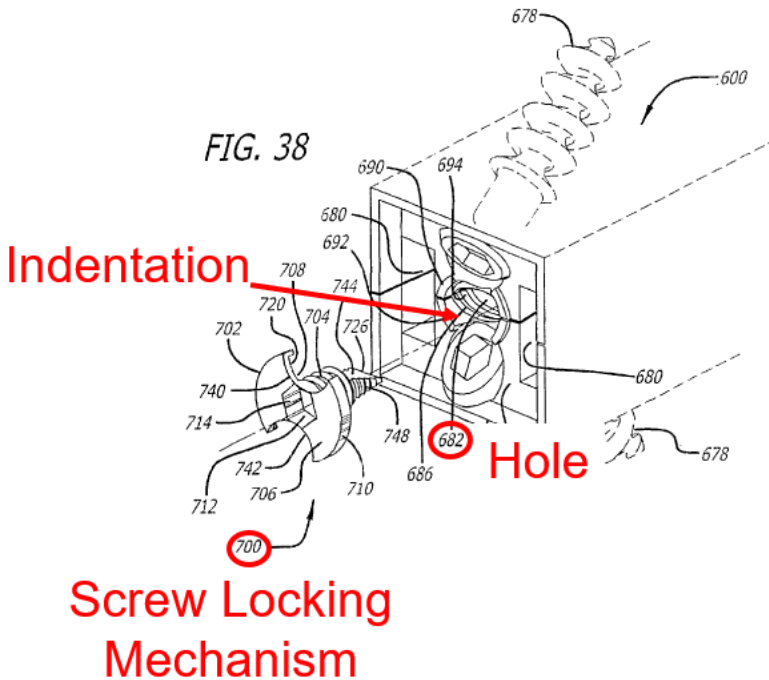
Claims	Exemplary Citations to Prior Art
	the implant by moving the upper and lower members apart, (2) maintain[ing] the implant in an expanded state by holding at least a portion of the upper and lower members apart so as to maintain the increased height of the implant and resist the collapse of the implant to the collapsed implant height, (3) prevent[ing] the implant from expanding beyond a predetermined amount by engaging at least a portion of the upper and lower members, and (4) lock[ing] bone screws to the implant by blocking the exit path of the bone screws in a direction opposite to the direction of insertion.” <i>Id.</i> at 21:60-22:4; <i>see also id.</i> at 18:47-50. Thus, a POSITA would have been motivated to modify implant 200 such that its trailing end surface would have included “an indentation” extending between the first and second screw holes 274 (“first and second internal screw guides”) and an opening within the indentation leading into the top wall of the implant, so that an end cap, such as end cap 700, engages with the implant 200. A POSITA would have looked at the implant 600 in the figures 38-41 embodiment, which includes such indentation and opening features for engagement with an end cap 700, and made similar modifications to the trailing end surface of implant 200. For similar reasons, a POSITA would have also had a reasonable expectation of success in modifying Michelson’s implant 200 such that it is adapted to engage an end cap like end cap 700 on its trailing end surface. For example, as discussed above, the relevant structures of implants 200 and 600 are generally the same. Moreover, as discussed above, Michelson itself discloses a modified implant adapted to engage with an end cap on its trailing end, and similar modifications would have been applied to implant 200 such that it would have included an indentation on the top surface of its top wall of extending between at least a portion of the first internal screw guide and the second internal screw guide, as shown in figure 40 above. <i>Id.</i> at 23:65-24:28. A POSITA would have understood that by configuring the indentation this way, it would have ensured that the end cap performs its function of locking the bone screws and preventing them from backing out or pulling out of the implant, once the implant is deployed. Thus, a POSITA would have had a reasonable expectation of success in modifying Michelson’s implant 200, as proposed. For the foregoing reasons, Michelson discloses and/or suggests this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.

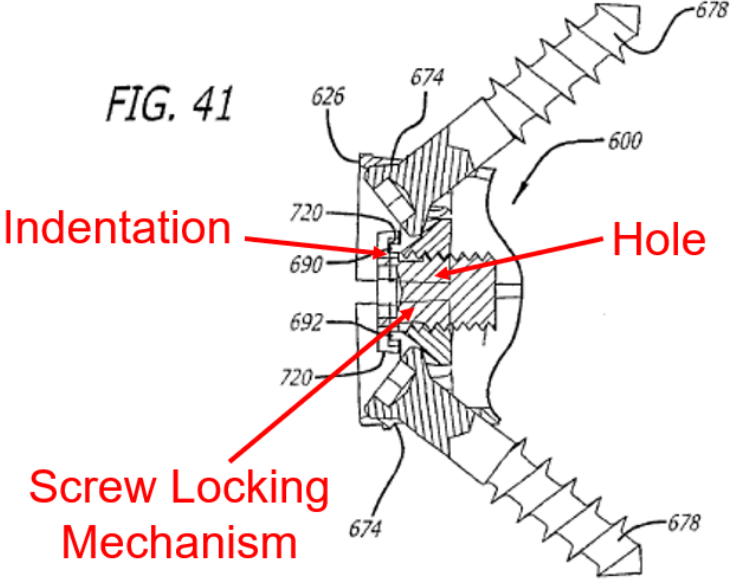
Claims	Exemplary Citations to Prior Art
[1H] a hole extending into the top wall at an angle that is perpendicular to the top surface of the top wall and at a position that is located in the indentation between the first internal screw guide and the second internal screw guide,	Michelson discloses and/or suggests this limitation for at least reasons similar to those given above for limitation [1G]. For example, as discussed in above as to that claim limitation, Michelson's modified implant 200 includes an opening 682, <i>i.e.</i>, "a hole" extending into the top wall located in the indentation between the first and second screw holes 274 ("first internal screw guide and the second internal screw guide"). As shown in figure 40 below, this opening 682 extends into the top wall "at an angle that is perpendicular to the top surface of the top wall," as the opening 682 is not tilted upwards or downwards when extending into the implant top wall. Michelson at 23:65-24:28.  <i>Id.</i> at Fig. 40 (annotated).

Claims	Exemplary Citations to Prior Art
	For the foregoing reasons, Michelson discloses and/or suggests this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[1I] a first screw having a first screw head and a first threaded body that is sized and configured to be inserted through the first internal screw guide;	Michelson discloses and/or suggests this limitation, as well as limitation [1J], below. For example, as shown in figure 27 below, Michelson discloses that a first bone screw 278 (“first screw”) having “a first threaded body” is “sized and configured to be inserted through” the first screw hole 274 (“first internal screw guide”). Michelson at 7:63-8:2, 19:56-61, 20:19-35. Similarly, as shown below, Michelson discloses that a second bone screw 278 (“second screw”) having “a second threaded body” is “sized and configured to be inserted through” the second screw hole 274 (“second internal screw guide”). <i>Id.</i> at 7:63-8:2, 19:56-61.

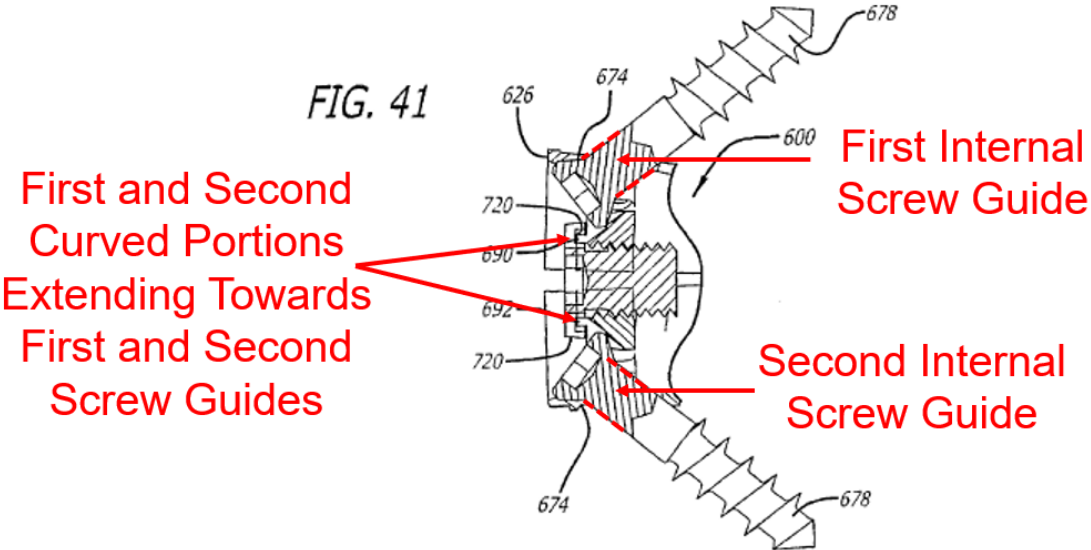
Claims	Exemplary Citations to Prior Art
	<i>Id.</i> at Fig. 27 (annotated). While the “first screw head” and “second screw head” are hidden in figure 27 behind an implant wall, they are depicted in the figure 40 embodiment with end cap 700, as shown below. A POSITA would have understood that screws 278 in figure 27 would have had similar screw heads, so the screws could be driven into the screw holes 278.

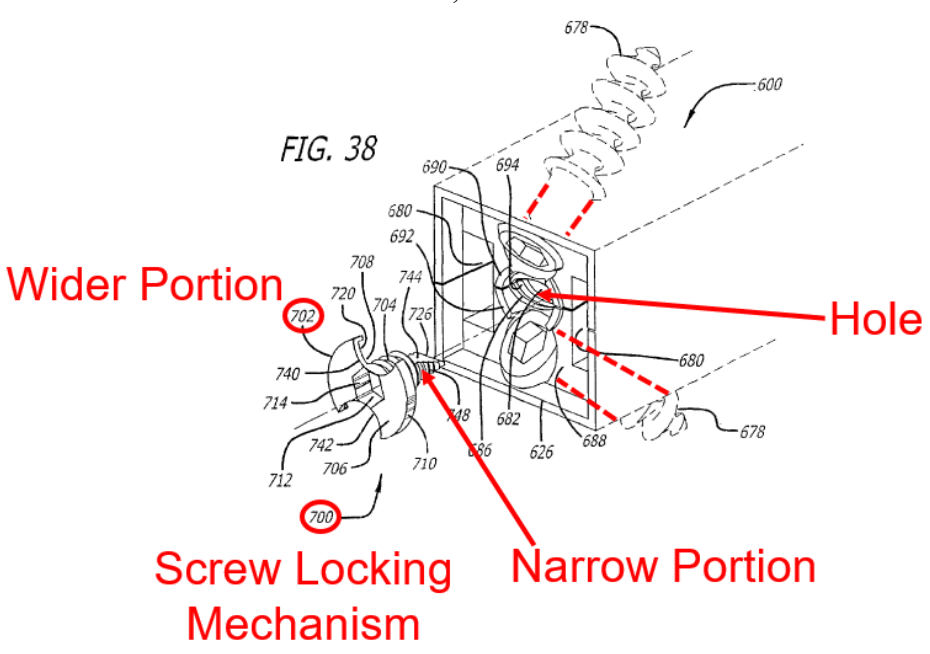
Claims	Exemplary Citations to Prior Art
	 <i>Id.</i> at Fig. 40 (annotated). For the foregoing reasons, Michelson discloses and/or suggests this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[1J] a second screw having a second screw head and a second threaded body that is sized and configured to be inserted through the second internal screw guide; and	Michelson discloses and/or suggests this claim limitation for the reasons stated above as to claim limitation [1I]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.

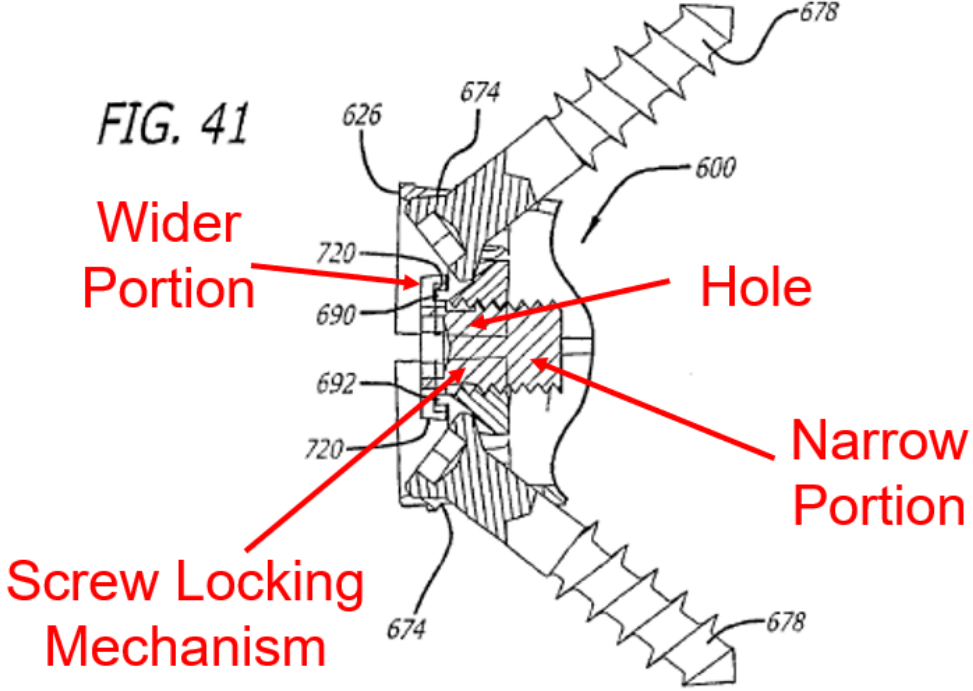
Claims	Exemplary Citations to Prior Art
[1K] a screw locking mechanism positioned in the indentation of the intervertebral spacer and extending at least partially into the hole.	Michelson discloses and/or suggests this limitation, for at least reasons similar to those given above for limitations [1G]-[1H]. For example, as discussed with respect to those claim limitations, Michelson's modified implant 200 includes an end cap like end cap 700 for "lock[ing] bone screws to the implant by blocking the exit path of the bone screws in a direction opposite to the direction of insertion." Michelson at 21:60-22:4. Thus, in Michelson's modified implant 200, the end cap is a "screw locking mechanism," at least in how Moskowitz has construed and applied that term. As discussed with respect to claim limitations [1G]-[1H] and shown in figures 38 and 41 below, head 702 of end cap 700 is configured to be positioned in the indentation of implant 200 and its stem 704 is configured to extend into the opening 682. 

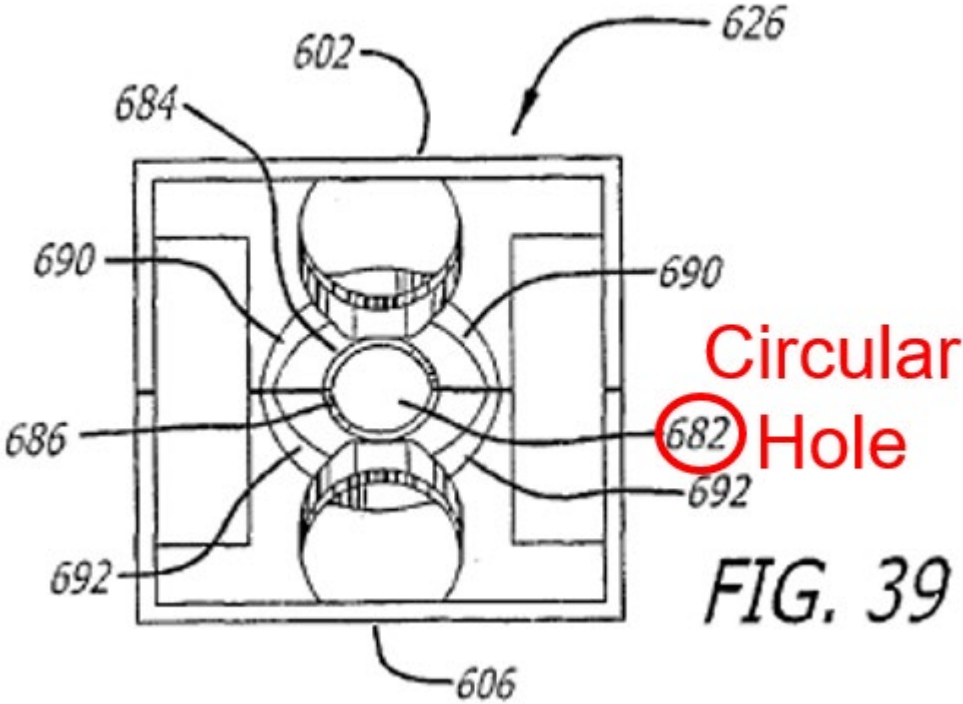
Claims	Exemplary Citations to Prior Art
	 <i>Id.</i> at Figs. 38, 41 (annotated). For the foregoing reasons, Michelson discloses and/or suggests this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 2	
[2] The apparatus of claim 1, wherein the screw locking mechanism comprises means for preventing the first and	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson discloses and/or suggests this limitation. As shown in figure 38 below, in Michelson’s modified implant 200, head 702 of end cap 700 (“screw locking mechanism”) includes curved portions that, when

Claims	Exemplary Citations to Prior Art
second screw from pulling out of the first and second internal screw guides.	head 702 is positioned correctly, cover both the first and second screws and thereby prevent them from pulling out of the first and second internal screw guides. Those curved portions are thus “means for preventing the first and second screw from pulling out of the first and second internal screw guides.” FIG. 38 First Internal Screw Guide Second Internal Screw Guide First Curved Portion Second Curved Portion Screw Locking Mechanism <i>Id.</i> at Fig. 38 (annotated). Specifically, one of the functions of the end cap 700’s head 702 is to “cover each of screws 678” inserted in the screw guides, once end cap 700 is rotated. <i>Id.</i> at 24:5-11; <i>see also id.</i> at 21:60-22:4. Thus, once the screws are inserted in the implant’s internal screw guides and fixed to the adjacent vertebral bodies, end cap 700 is turned such that curved portions of head 702 extend towards and at least partially cover the screw heads of the screws inserted in the internal screw guides. The curved portions extending towards the screw guides can be seen, <i>e.g.</i>, in figure 41 below.

Claims	Exemplary Citations to Prior Art
	<i>FIG. 41</i>  <i>Id.</i> at Fig. 41 (annotated). For the foregoing reasons, Michelson discloses and/or suggests this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 4	
[4] The apparatus of claim 1, wherein the screw locking mechanism comprises a narrow portion that is positioned in the hole and a wider portion that is positioned in the indentation,	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson discloses and/or suggests this limitation. As discussed above with respect to claim limitations [1G]-[1K] and shown below in figures 38 and 41, Michelson's modified implant 200 includes end cap 700 ("screw locking mechanism"), which includes a stem 704 ("narrow portion") that is positioned in the

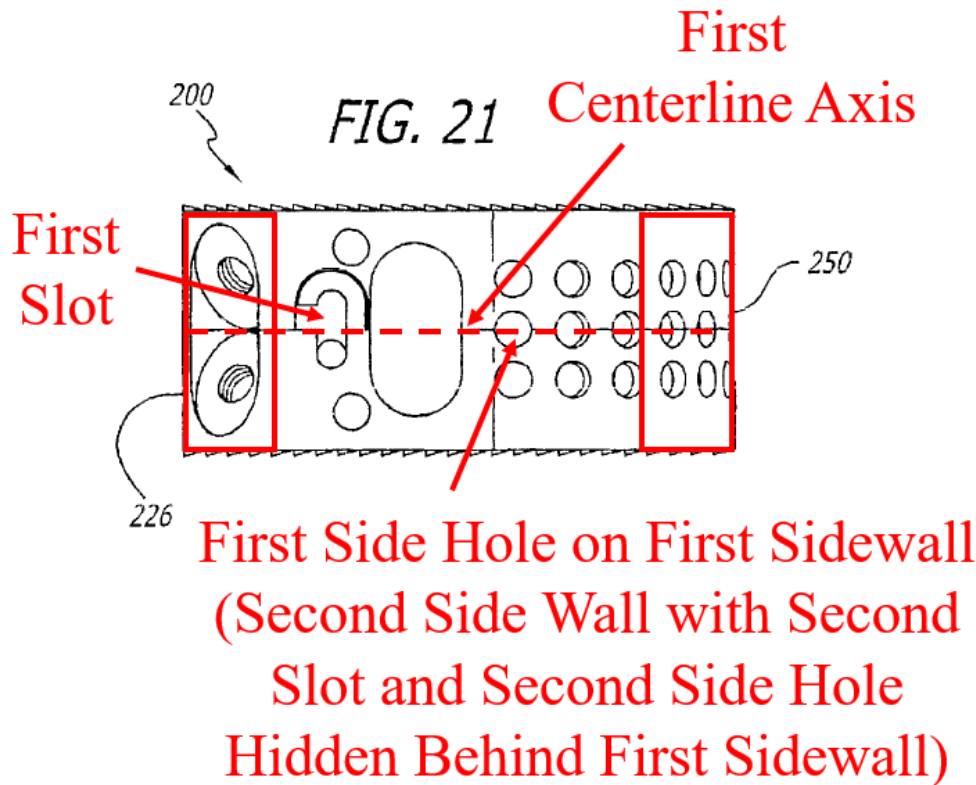
Claims	Exemplary Citations to Prior Art
wherein the narrow portion extends from the wider portion into the hole.	opening 682 (“hole”) and a head 702 (“wider portion”) that is positioned in the indentation. Michelson at 23:65-24:24. As also shown below, stem 704 “extends from” the head 702 into the opening 682.  FIG. 38 Wider Portion Hole Screw Locking Mechanism Narrow Portion

Claims	Exemplary Citations to Prior Art
	 <i>Id.</i> at Figs. 38, 41 (both annotated). For the foregoing reasons, Michelson discloses and/or suggests this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 5	
[5] The apparatus of claim 1,	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K].

Claims	Exemplary Citations to Prior Art
wherein the hole is a circular hole.	Michelson discloses “wherein the hole is a circular hole.” As shown in figure 39 below, which shows a rear view of an implant adapted to receive end cap 700, opening 682 (“hole”) is a “circular hole.” Michelson at 23:65-24:28.  <i>Id.</i> at Fig. 39 (annotated). For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of

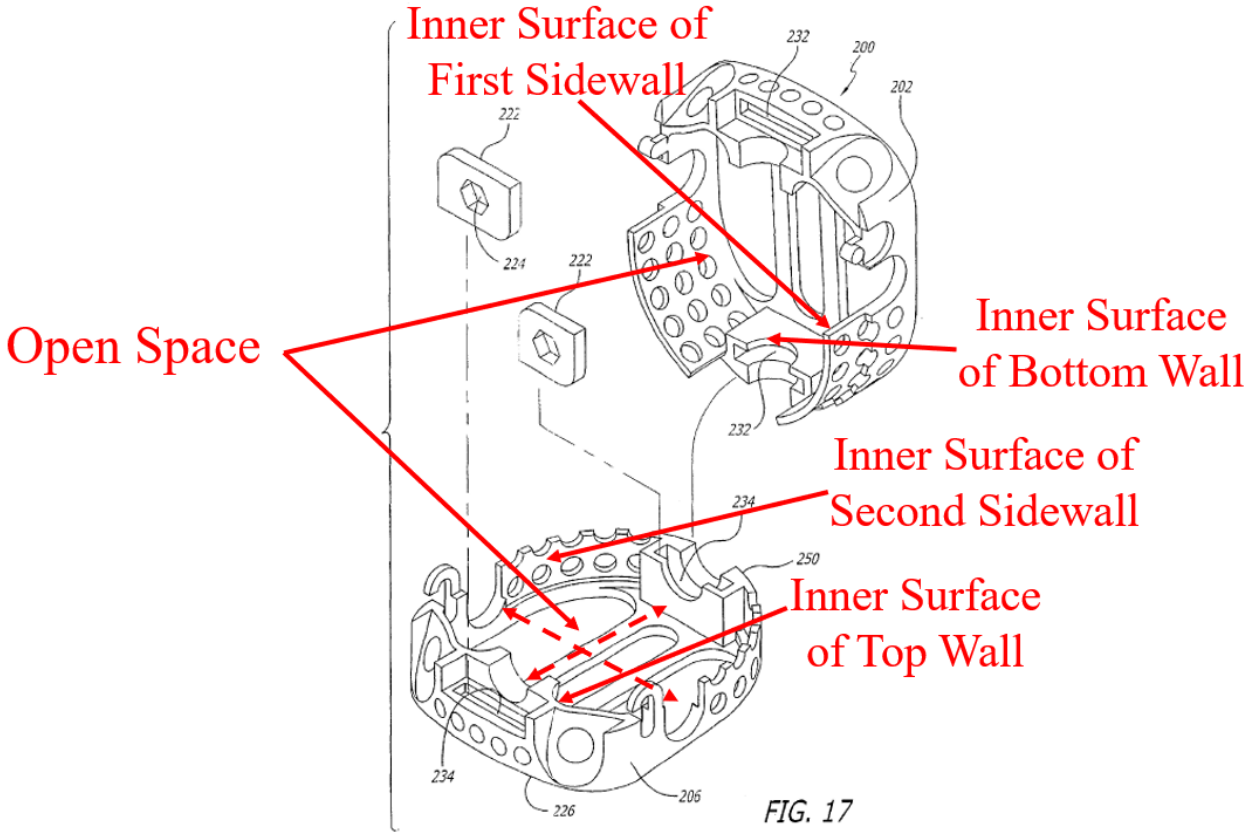
Claims	Exemplary Citations to Prior Art
	the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 6	
[6A] The apparatus of claim 1, wherein the intervertebral spacer further defines: a first circular side hole extending into the first outer surface of the first sidewall; and	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson discloses “wherein the intervertebral spacer further defines: a first circular side hole extending into the first outer surface of the first sidewall.” For example, as shown in figures 17 and 21 below, the implant 200 (“intervertebral spacer”) defines circular holes extending into outer surfaces of its first and second sidewalls, with the side holes on one sidewall opposing the sidewalls on the other sidewall. Michelson at 18:56-19:3. <i>Id.</i> at Figs. 17, 21 (both annotated). For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of

Claims	Exemplary Citations to Prior Art
	the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[6B] a second circular side hole extending into the second outer surface of the second sidewall, wherein the second circular side hole is positioned opposite of the first circular side hole,	Michelson discloses “a second circular side hole extending into the second outer surface of the second sidewall, wherein the second circular side hole is positioned opposite of the first circular side hole.” For example, as shown in figures 17 and 21 below, the implant 200 (“intervertebral spacer”) defines circular holes extending into outer surfaces of its first and second sidewalls, with the side holes on one sidewall opposing the sidewalls on the other sidewall. Michelson at 18:56-19:3. Circular Side Holes on Second Outer Surface of Second Side Wall Circular Side Holes on First Outer Surface of First Side Wall FIG. 21 First Circular Side Hole Extending Into First Outer Surface of First Sidewall (Second Circular Side Hole Hidden on Opposite Side) <i>Id.</i> at Figs. 17, 21 (both annotated). For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[6C] wherein the first slot and the first circular side hole are both positioned along the first	Michelson discloses this limitation. For example, as shown below in figure 21, the “first slot” of limitation [1C] and the “first circular side hole” of limitation [6A] are both “positioned along the first centerline axis bisecting the first side wall.” Michelson at 18:56-19:3. And while the “second slot” of limitation [1D] and

Claims	Exemplary Citations to Prior Art
centerline axis that bisects the first side wall and wherein the second slot and the second circular side hole are both positioned along the second centerline axis that bisects the second side wall.	corresponding “second circular side hole” are not shown in figure 21, a POSITA would have understood based on the overall disclosure of Michelson that the second slot and second circular side hole are similarly “positioned along the first centerline axis bisecting the first side wall,” since the openings on both sidewalls of implant 200 are symmetric as shown, <i>e.g.</i>, in figure 17.  First Centerline Axis First Slot First Side Hole on First Sidewall (Second Side Wall with Second Slot and Second Side Hole Hidden Behind First Sidewall) Michelson at Fig. 21 (annotated). For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of

Claims	Exemplary Citations to Prior Art
	the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 7	
[7] The apparatus of claim 1, wherein the top wall is continuous with the first and second sidewalls.	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson discloses “wherein the top wall is continuous with the first and second sidewalls.” For example, as shown below in figure 17, at least a portion of the top wall that is part of the upper member 202 of implant 200 is “continuous” with the first and second sidewalls that are part of upper member 202, as the upper member 202 is one continuous piece. Michelson at 18:56-19:3. Similarly, as shown below, at least a portion of the top wall that is part of the lower member 206 of implant 200 is “continuous” with the first and second sidewalls that are part of lower member 206. <i>Id.</i>

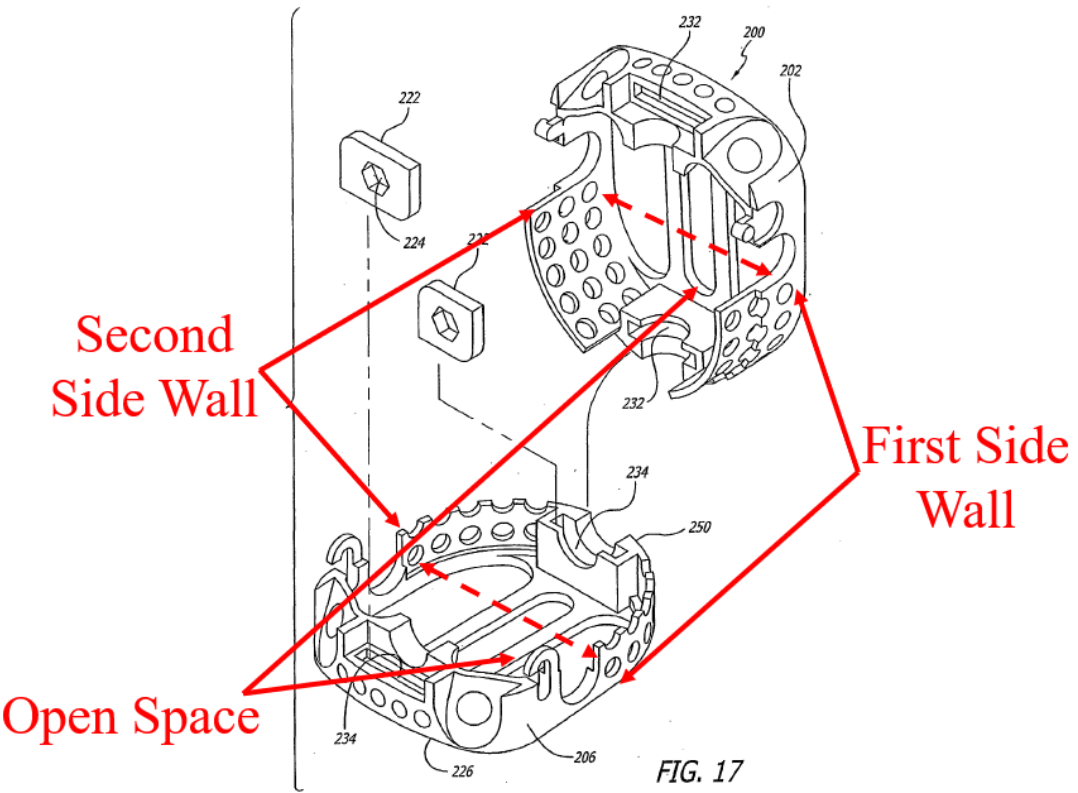
Claims	Exemplary Citations to Prior Art
Claim 8	
[8] The apparatus of claim 1, wherein the open space extends from an inner surface of the first sidewall to an inner surface of the second sidewall and extends from an inner surface of the top wall to an inner surface of the bottom wall.	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson discloses “wherein the open space extends from an inner surface of the first sidewall to an inner surface of the second sidewall and extends from an inner surface of the top wall to an inner surface of the bottom wall[.]” For example, as discussed above with respect to claim limitation [1B] and shown in figure 17 below, the hollow space (“open space”) extends from “an inner surface of the first sidewall” of upper and lower members 202, 206 to “an inner surface of the second sidewall” of upper and lower members 202, 206, and extends from “an inner surface of the top wall,” bounded by trailing end 226, to “an inner surface of the bottom wall,” bounded by leading end 250. Michelson at 18:56-19:3.

Claims	Exemplary Citations to Prior Art
	 <i>Id.</i> at Fig. 17 (annotated). For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 9	

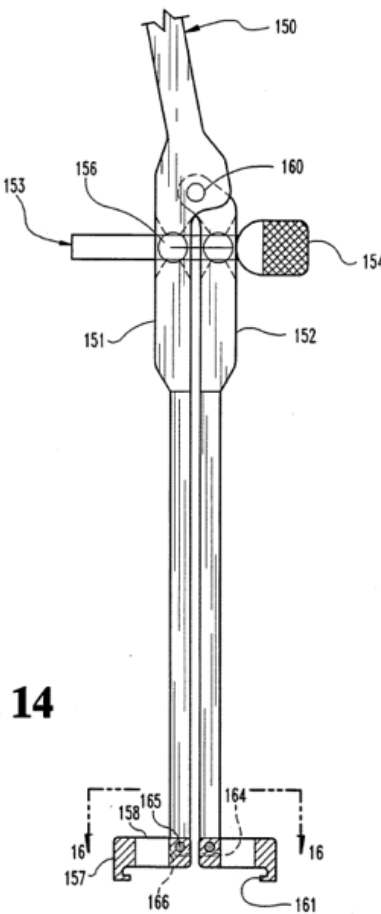
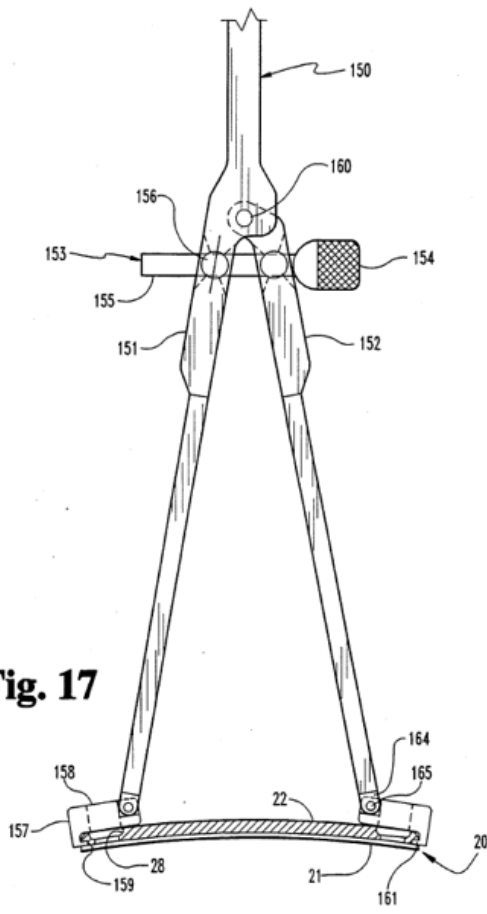
Claims	Exemplary Citations to Prior Art
[9] The apparatus of claim 1, and further comprising means for facilitating integration and fusion with superior and inferior vertebral bodies.	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson discloses the apparatus of claim 1 “further comprising means for facilitating integration and fusion with superior and inferior vertebral bodies.” Michelson also discloses this claim limitation under a claim interpretation under which the claimed “means” are ridges. For example, Michelson discloses that the upper and lower surfaces of its implant 200 that engage with the upper and lower vertebral bodies V, respectively, include bone-engaging projections for engaging the adjacent vertebral bodies. Michelson at 2:66-3:1, 26:7-25. Michelson discloses that the bone-engaging projection may be a “ratchet,” “surface roughening, knurling, or any other configuration suitable for the intended purpose,” <i>i.e.</i>, to facilitate integration and fusion of the adjacent vertebral bodies. <i>Id.</i> at 12:17-24; <i>see also id.</i> at 21:24-27. The bone-engaging projections of implant 200 can be seen in figure 21 below. The diagram shows a cross-section of a rectangular implant. On the left, there are two circular features, one above and one below a central horizontal line. In the middle, there is a larger, irregularly shaped cavity. On the right, there is a series of small circles arranged in two rows. The top surface of the implant is labeled 226 and the bottom surface is labeled 250. Two red arrows point to the top and bottom surfaces, with the text 'Bone-engaging projections' written in red next to each arrow. <i>Id.</i>, Fig. 21 (annotated) (while the bone-engaging projections are not labeled in Figure 21, the same structural features are labeled in Figure 6 as 118, <i>id.</i> at 12:17-24).

Claims	Exemplary Citations to Prior Art
	These bone-engaging projections, <i>e.g.</i>, teeth of a ratchet, disclose or suggest ridges. As another example, as discussed above with respect to claim limitations [1A] and [1B], Michelson’s implant can be packed with bone graft. Implant 200’s hollow space, which is defined by the inner surfaces of upper and lower members 202, 206, is “packed with bone or other fusion-promoting substances.” <i>Id.</i> at 5:13-34, 18:45-50; <i>see also id.</i> at 13:47-62, 26:7-28. For the foregoing reasons, Michelson discloses this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 14	
[14] The apparatus of claim 1, wherein a diameter of the hole is smaller than a diameter of the first and second internal screw guides.	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson further discloses and/or suggests “wherein a diameter of the hole is smaller than a diameter of the first and second internal screw guides.” For example, as shown in figure 40 below, in Michelson’s modified implant 200 which would have included the end cap 700 (“screw locking mechanism”), the diameter of the opening 682 (“hole”) is smaller than a diameter of the first and second screw holes 674, which correspond to the first and second screw holes 274 in the figure 17 embodiment (“the first and second internal screw guides”). The diameters are also shown on the side of the figure for comparison.

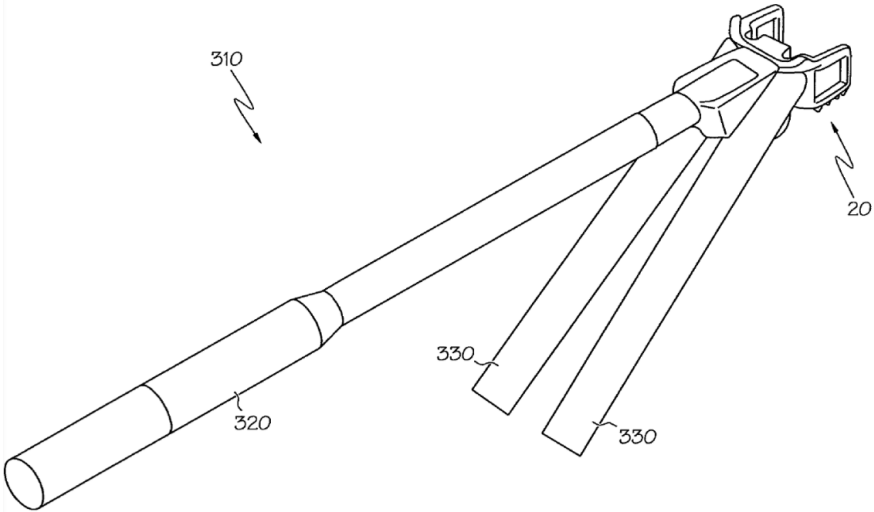
Claims	Exemplary Citations to Prior Art
	<i>Id.</i> at Fig. 40 (annotated). Michelson also renders this limitation obvious. For example, making the diameter of opening 682 that receives stem 704 of end cap 700 smaller than the diameter of the first and second screw holes 274/674 would have been a matter of design choice. For example, the '505 patent specification does not provide any criticality associated with the relative diameters of the hole and internal screw guides. <i>Id.</i> A POSITA would have also had a reasonable expectation of success in modifying the relative diameters of opening 682 and the first and second screw holes 274/674 and making any associated modifications to the end cap 700 or screws 278/678 as it would not have changed the functionality of Michelson's implant. For the foregoing reasons, Michelson discloses or renders obvious this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.

Claims	Exemplary Citations to Prior Art
Claim 15	
[15] The apparatus of claim 1, wherein the open space extends continuously from the first sidewall to the second sidewall.	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson further discloses “wherein the open space extends continuously from the first sidewall to the second sidewall.” For example, as shown in figure 17 below, the hollow space (“open space”) in implant 200 “extends continuously from the first sidewall to the second sidewall.” For example, as shown below, there are no obstructions between the first and second sidewalls in the hollow space (<i>e.g.</i>, the areas marked by the dashed arrows).  FIG. 17 Michelson at Fig. 17 (annotated).

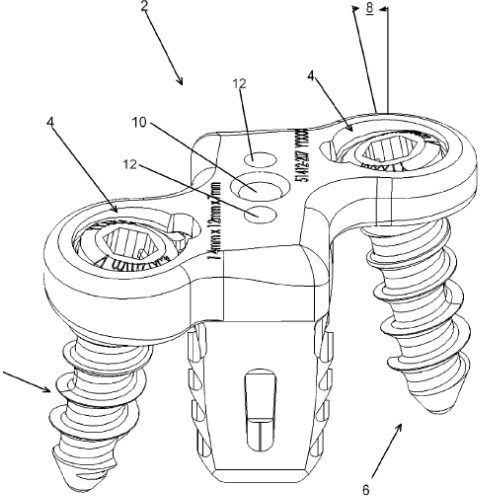
Claims	Exemplary Citations to Prior Art
	For the foregoing reasons, Michelson discloses or renders obvious this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 16	
[16A] A system comprising: The apparatus of claim 1; and a tool for manipulating and inserting the spacer into the disc space between the first vertebral body and the second vertebral body to provide fusion of the first vertebral body to the second vertebral body via biological bone fusion and screw fusion,	Michelson in view of Coates discloses and/or suggests this limitation. Limitation [16A] relates to a system including the apparatus of claim 1 and a tool for manipulating and inserting the intervertebral spacer of the apparatus into the disc space between the vertebrae. Michelson discloses “an insertion tool that holds the implant during insertion into position in the spine.” Michelson at 8:13-16, 18:7-19. Michelson also discloses that its implant includes tool-engaging portions “adapted to engage” such an insertion tool. <i>Id.</i>; <i>see also id.</i> at 8:10-26. Michelson further discloses that “[t]he configuration of the tool-engaging portion may be an opening, and more particularly an opening that is along the longitudinal axis of the implant,” and that such an opening may be a “slot that functions to cooperatively engage and disengage a tool for use in inserting the implant.” <i>Id.</i> at 8:16-23. While Michelson does not label the “first slot” and “second slot” of limitations [1C] and [1D] as tool-engaging portions, a POSITA would have recognized based on Michelson’s disclosures regarding tool-engagement portions that the first and second slots of Michelson’s implant 200 may serve as tool-engagement portions, as they are openings/slots along the longitudinal axis of the implant 200 and thus adapted to engage (or could easily be adapted to engage) with the insertion tool. Michelson, however, does not describe any additional details regarding the insertion tool. Thus, a POSITA would have considered previously described tools for holding and inserting spinal implants into a target site. One such tool is described in Coates in figures 14-19. Coates at 12:67-13:12. According to Coates, “[t]he present invention concerns spinal instrumentation systems.” <i>Id.</i> at 1:10-11. As shown in figures 14 and 17 below, Coates discloses a holder-drill guide 150 (“tool”) for manipulating and inserting a spinal implant in the spine. <i>Id.</i> at 12:67-13:12. Figure 14 shows the tool in a closed position (<i>e.g.</i>, when arms 151, 152 are

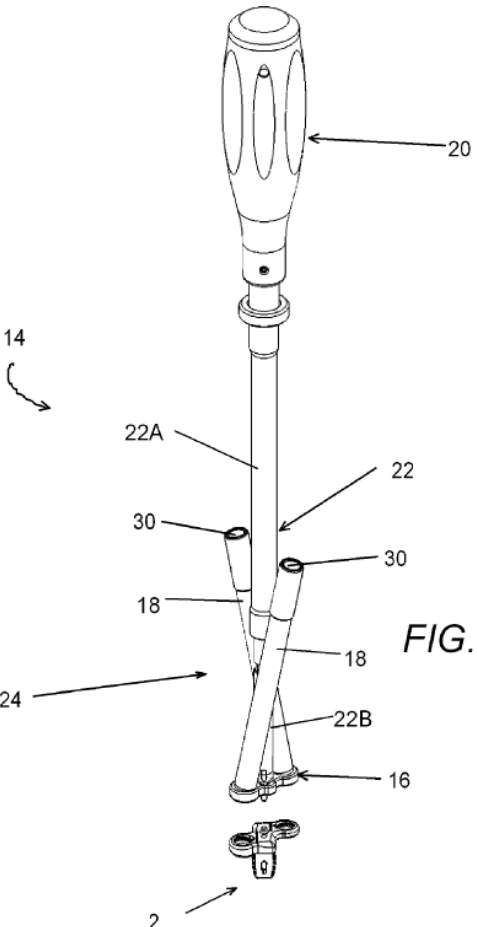
Claims	Exemplary Citations to Prior Art
	closed) and figure 17 shows the tool in an open position (<i>e.g.</i>, when arms 151, 152 are open) where the tool is holding a spinal implant. <i>Id.</i> at 5:20-21, 26-27.  Fig. 14  Fig. 17 Coates at Figs. 14, 17. As discussed above with respect to claim limitation [1A], the implant 200 (“spacer”) which would have been inserted by Coates’ tool is inserted “into the disc space between the first vertebral body and the second

Claims	Exemplary Citations to Prior Art
	vertebral body to provide fusion of the first vertebral body to the second vertebral body via biological bone fusion and screw fusion.” A POSITA would have been motivated to use Coates’ tool for manipulating and inserting Michelson’s implant 200 in the disc space. For example, as noted above, while Michelson generally describes an insertion tool for holding and delivering its implant to a disc space, it does not provide any additional details regarding such a tool. In addition, due to the nature of the surgical location, an elongated, slender tool would be preferred because it would allow for a smaller incision, which would have been better for the patient. Thus, a POSITA would have looked to previously described tools including the one disclosed in Coates. A POSITA would have had a reasonable expectation of success in utilizing Coates’ tool with Michelson’s implant. For example, as discussed further below with respect to the remaining limitations of claim 16 and as shown in figures 14 and 17 above, Coates’ tool includes engagement prongs for securely holding Michelson’s implant during insertion and delivery to the target site and a screw guide for guiding the screws to the implant’s screw holes. A POSITA would have known to make any necessary modifications to these mechanisms in Coates’ tool so they are compatible with Michelson’s implant 200 to ensure Coates’ tool would have safely and securely delivered the implant in the target disc space. A POSITA would have also been motivated to use Coates’ tool as it features an elongate shaft (as discussed with respect to claim limitation [16B] below), which provides improved reach and maneuverability. Moreover, while Coates discloses using its tool to insert spinal implants such as bone plates, a POSITA would have understood that the same tool with minor modifications would have also been suitable to deliver a spinal disc implant in a disc space. Accordingly, Michelson in view of Coates discloses and/or suggests limitation [16A]. U.S. Patent No. 8,100,976 to Bray (“Bray”) additionally teaches this limitation. <i>See, e.g.:</i>

Claims	Exemplary Citations to Prior Art
	 FIG. 13 Bray at Fig. 13. The structure of Bray described and depicted herein is similar enough to that of the intervertebral cages disclosed in other prior art references discussed in these invalidity contentions (including STALIF, Waugh '000, Waugh '607, Waugh '569, Messerli, and Michelson) that it would be obvious to a POSITA to incorporate its teachings—including its teachings about the tool described in this claim limitation—into those other references and the Michelson system. Accordingly, in light of the disclosure of tools with Michelson, it would have been obvious to a POSITA to add the tool disclosed in Bray to Michelson to insert and position the STALIF device between two vertebrae “to provide fusion of the first vertebral body to the second vertebral body via biological bone fusion and screw fusion.” Adding the Bray tool to manipulate and insert the Michelson device would thus have constituted: (1) combining prior art elements according to known methods to yield predictable results; (2) simple substitution of one known element for another to obtain predictable results; (3) use of known techniques to improve similar devices in the same way; and (4) applying a known technique to a known device ready for improvement to yield predictable results; and (5) choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success.

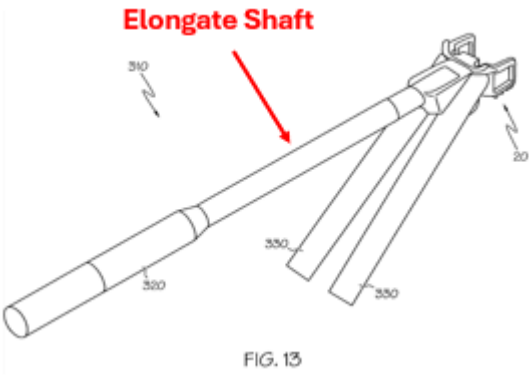
Claims	Exemplary Citations to Prior Art
	As another example, U.S. Patent No. 8,172,854 to Blain <i>et al.</i> (“Blain”) discloses and/or suggests this limitation. Blain describes an instrument guide for, for example, an “interbody fusion implant 2.” <i>See</i> Blain at 4:26-28. The instrument guide “can facilitate access to the fastener apertures 4 of the implant 2, as well as provide a guide for a particular angle of access to the apertures.” <i>Id</i> at 4:28-31. “To facilitate attachment or engagement of an instrument guide to an implant 2, the implant may further comprise one or more attachment sites to facilitate the attachment and/or detachment of the instrument guide.” <i>Id.</i> at 4:39-43. Although the figures of Blain do not show engagement sites on the sides of the implant, such an arrangement is clearly contemplated (and would be known in the art, as evidenced by the discussion above). <i>See id.</i> at 4:26-55. Blain further teaches its instrument guide “can facilitate the correct drilling or insertion angle of the desired fixation angle 8 between the polyaxial fastener 6 and the screw apertures 4 of the implant 2.” <i>Id.</i> at 4:37-39; <i>see also</i>:

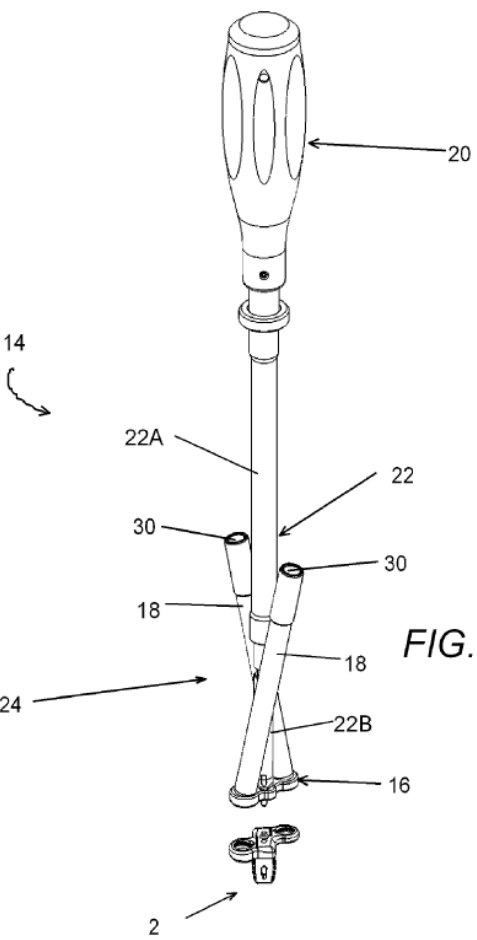
Claims	Exemplary Citations to Prior Art
	 FIG. 1 Blain at Fig. 1.

Claims	Exemplary Citations to Prior Art
	 FIG. 2A Blain at Fig. 2A. Although Blain's tool is shown inserting screws outside of the interbody device, a POSITA would readily appreciate that the tool, with minor modifications, could insert the screws in interbody device's like Michelson's with screws that go through them. Accordingly, Michelson in view of Blain also discloses or suggests this limitation. Adding the Blain tool to manipulate and insert the Blain device would thus have constituted: (1) combining prior art elements according to known methods to yield predictable results; (2) simple substitution of one known element for

Claims	Exemplary Citations to Prior Art
	another to obtain predictable results; (3) use of known techniques to improve similar devices in the same way; and (4) applying a known technique to a known device ready for improvement to yield predictable results; and (5) choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success. As another example, a POSITA would be motivated to combine any of the tools discussed above having engagement on the side of interbodies (for the avoidance of injury to the vertebral bodies) and Blain (for guiding the screws through the interbodies), and use the combined tool with Michelson. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson in view of Coates, it would have been obvious to a person having ordinary skill in the art to modify Michelson and/or Coates or combine one or both of them with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[16B] the tool comprising: an elongate shaft;	Michelson in view of Coates discloses and/or suggests this limitation. For example, as shown in figures 14 and 17 below, Coates’ holder-drill guide 150 (“tool”) engages the spinal implant. Coates at 5:27-28, 12:67-13:12. Coates’ tool has two arms 151, 152. <i>Id.</i> at 13:4-6. The arms 151, 152 correspond to “an elongate shaft.” <i>Id.</i> at 13:50-55.

Claims	Exemplary Citations to Prior Art
	Fig. 14 Elongate Shaft First and Second Gripper Prongs Fig. 17 Elongate Shaft First and Second Gripper Prongs Coates at Figs. 14, 17 (both annotated). Accordingly, Michelson in view of Coates discloses and/or suggests limitation [16B]. Bray also discloses this limitation.

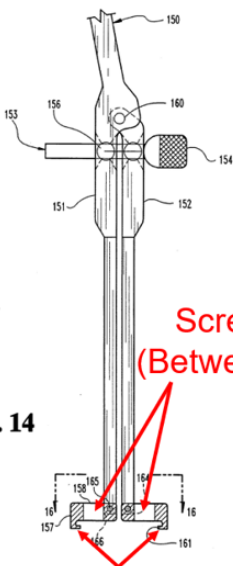
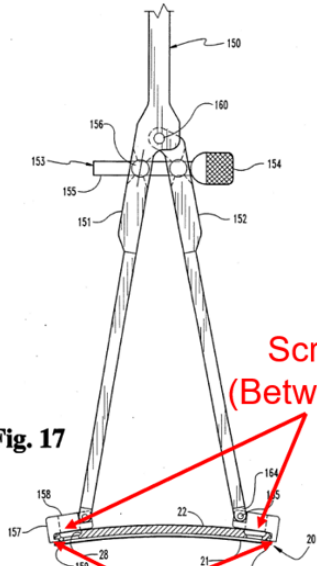
Claims	Exemplary Citations to Prior Art
	 Bray at Fig. 13 (annotated). Blain also discloses a tool with an elongate shaft:

Claims	Exemplary Citations to Prior Art
	 FIG. 2A Blain at Fig. 2A. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson in view of Coates, it would have been obvious to a person having ordinary skill in the art to modify Michelson and/or Coates or combine one or both of them with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.

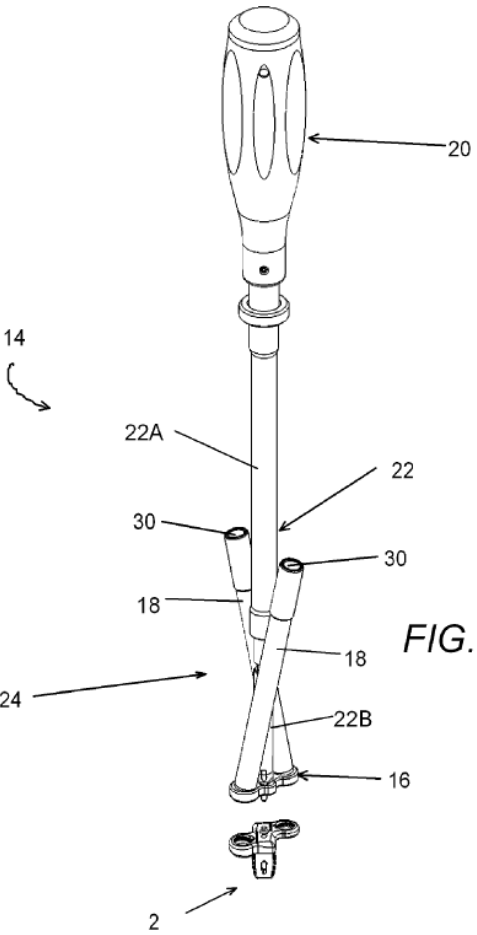
Claims	Exemplary Citations to Prior Art
[16C] first and second gripper prongs positioned such that the first gripper prong engages the first slot of the spacer and the second gripper prong engages the second slot of the spacer when the tool engages the spacer; and	Michelson in view of Coates discloses and/or suggests this limitation. For example, as shown in figures 14 and 17 below, Coates’ holder-drill guide 150 (“tool”) engages the spinal implant. Coates at 5:27-28, 12:67-13:12. Coates’ tool has two feet 157. <i>Id.</i> at 13:4-6. On each foot, there is a small hook 161 that attaches to a notch on the implant. <i>Id.</i> at 13:9-20. The small hooks 161 on either side of the feet 157 correspond to the “first and second gripper prongs,” as the hooks, with any needed modifications, would engage with the first and second slots of the implant 200, <i>i.e.</i>, the hooks 161 are “positioned such that the first gripper prong engages the first slot of the spacer and the second gripper prong engages the second slot of the spacer when the tool engages the spacer.” <i>Id.</i> at 13:50-55.

Claims	Exemplary Citations to Prior Art
	Fig. 14 Elongate Shaft First and Second Gripper Prongs Fig. 17 Elongate Shaft First and Second Gripper Prongs Coates at Figs. 14, 17 (both annotated). Accordingly, Michelson in view of Coates discloses and/or suggests limitation [16C]. Bray also discloses and/or suggests this limitation. While the tool depicted in Figure 13 of Bray does not disclose “gripper prongs,” because it discloses one projection that interfaces with the interbody, Bray discloses another tool as well, which also acts as a screw guide. Bray at 11:48-67; <i>see also</i> Fig. 14. That second tool includes “two substantially round projections 350 that engage corresponding notches 360

Claims	Exemplary Citations to Prior Art
	provided between the secondary member 110 of the base 20 and an adjacent interface member 30 provided on each side of the secondary member 110 (see FIGS. 4 and 5) to hold the second guide tool 340 in position.” These two projections satisfy the “gripper prongs” requirement of this limitation. And it would have been obvious to a POSITA to include “gripper prongs” such as these in the tool shown in Figure 13 for additional stability when drilling the holes for and inserting the bone screws through holes 140. This is particularly so because the interbody already includes the notches 350 with which they would interface. Alternatively or additionally, in light of the references discussed herein having gripper prongs, it would have been obvious to add gripper prongs to the other tools discussed herein to ensure secure installation of the interbodies. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson in view of Coates, it would have been obvious to a person having ordinary skill in the art to modify Michelson and/or Coates or combine one or both of them with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[16D] a screw guide for controlling a direction of the first screw and the second screw that are inserted into the first internal screw guide and the second internal screw guide of the spacer, wherein the screw guide is positioned between the plurality of prongs with distal ends of the prongs extending distally past the screw guide.	Michelson in view of Coates discloses and/or suggests this limitation. For example, as shown in figures 14 and 17 below, Coates’ tool includes a pair of thru-holes 158 provided for alignment with internal screw guides in the spinal implant. Coates at 13:6-9. These thru-holes 158 constitute “a screw guide,” as holes 158 are aligned with the internal screw guides and thus are “for controlling a direction of the first screw and the second screw that are inserted into the first internal screw guide and the second internal screw guide of the spacer.” As shown in figures 14 and 17 below, the thru-holes 158 (“screw guide”) are positioned between the small hooks 161 (“plurality of prongs”) with distal ends of the small hooks 161 distally past the thru-holes 158, as claimed.

Claims	Exemplary Citations to Prior Art
	 Fig. 14 Screw Guide (Between Prongs) First and Second Gripper Prongs (Distally Past Screw Guide)  Fig. 17 Screw Guide (Between Prongs) First and Second Gripper Prongs (Distally Past Screw Guide) Coates at Figs. 14, 17 (both annotated). A POSITA working with Michelson's implant would have used Coates' tool because, <i>e.g.</i>, its combination of thru-holes 158 ("screw guide") align with Michelson's screw holes ("internal screw guides,") thereby enabling the screw to pass through Michelson's implant and secure it to the adjacent vertebrae. Accordingly, Michelson in view of Coates discloses and/or suggests limitation [16D]. Bray also discloses this limitation.

Claims	Exemplary Citations to Prior Art
	FIG. 13 Bray at Fig. 13 (annotated). “When the handle 320 is properly engaged with the base member 20, a pair of guide tubes 330 is properly lined up with corresponding bone screw holes 140. The surgeon then inserts a drill or center punch (not shown) through one of the guide tubes 330 to drill a hole in the bone, through the screw hole 140. Then, after removing the drill, the surgeon inserts a bone screw 50 held at the end of a suitable driver (not shown) through the guide tube 330, and screws it into the bone. The process is repeated until the desired number of screws are placed, leaving the base member secured to the bone via the first bone screw holes 140. Or since the first guide tool 310 includes two guide tubes 330, the bone screws 50 can be inserted at substantially the same time.” <i>Id</i> at 11:27-47. Accordingly, Michelson in view of Bray discloses and renders obvious this claim limitation. As discussed above, Blain also teaches screw trajectory guides, and it would have been obvious to use a Blain-like tool (or a Blain combo tool) with the Michelson implant. These modifications would have constituted: (1) combining prior art elements according to known methods to yield predictable results; (2) simple substitution of one known element for another to obtain predictable results; (3) use of known techniques to improve similar devices in the same way; and (4) applying a known technique to a known device ready for improvement to yield predictable results; and (5) choosing from a finite number of identified, predictable solutions, with a reasonable expectation of success.

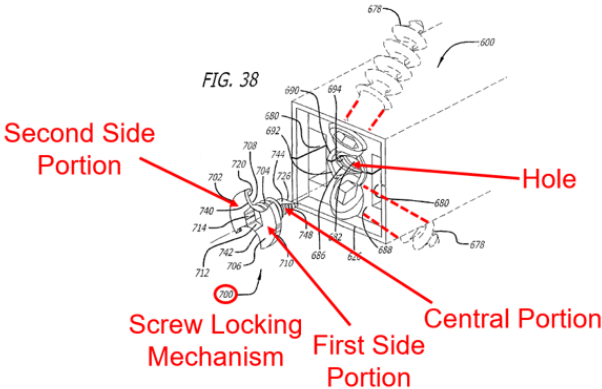
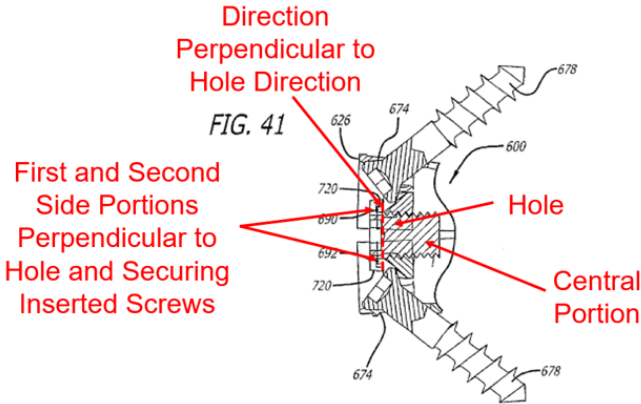
Claims	Exemplary Citations to Prior Art
	 FIG. 2A Blain at Fig. 2A. Accordingly, Michelson in view of Blain discloses and renders obvious this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson in view of Coates, it would have been obvious to a person having ordinary skill in the art to modify Michelson and/or

Claims	Exemplary Citations to Prior Art
	Coates or combine one or both of them with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 17	
[17] The apparatus of claim 1, and wherein the screw locking mechanism comprises titanium.	Michelson discloses or renders obvious claim 1. <i>See</i> [1A]-[1K]. Michelson further discloses “wherein the screw locking mechanism comprises titanium.” For example, Michelson discloses that “[t]he implant can also be formed of material such as metal including, but not limited to, titanium.” Michelson at 25:56-60. A POSITA would have understood that end cap 700 would have been formed with the same material as the implant. For example, a POSITA would have known that mixing materials, especially metals, would have been disadvantageous and discouraged in implant design because it can cause galvanic corrosion. Galvanic corrosion is undesirable in implant design as it can lead to implant failure, tissue reactions, or loosening. Thus, a POSITA would have understood that in Michelson, if the implant is made of titanium, then the end cap would have also been made from titanium. A POSITA would have also found it obvious to form the end cap from titanium for reasons similar to those given above. For example, given that Michelson discloses that the implant is made of titanium, a POSITA would have been motivated to form the end cap from titanium as well to minimize the chances of galvanic corrosion. A POSITA would have had a reasonable expectation of success in forming an end cap from titanium as forming implant components using the same metal as the implant was a well-known concept. For the foregoing reasons, Michelson discloses or renders obvious this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 19	
[19A] An intervertebral combination internal screw guide	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1A].

Claims	Exemplary Citations to Prior Art
and fixation apparatus configured to be inserted into a disc space between a first vertebral body and a second vertebral body and to provide fusion of the first vertebral body to the second vertebral body via biological bone fusion and screw fusion, the apparatus comprising:	To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[19B] an intervertebral spacer including a top wall, a bottom wall, and first and second sidewalls, wherein the intervertebral spacer defines: an open space between the top, bottom, first, and second sidewalls capable of receiving bone filling for biological bone fusion,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1B]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[19C] a first slot on a first outer side of the first sidewall,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1C]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[19D] a second slot on a second outer side of the second sidewall of the two sidewalls, wherein the second slot is positioned opposite of the first slot,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1D]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of

Claims	Exemplary Citations to Prior Art
wherein the first slot is positioned along a first centerline axis that bisects the first side wall and wherein the second slot is positioned along a second centerline axis that bisects the second side wall,	the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[19E] a first internal screw guide having a first entry opening and a first exit opening, the first entry opening of the first internal screw guide formed at least partially in a top surface of the top wall and the first exit opening formed at least partially in a bottom surface of the top wall and at least partially in a first side surface of the top wall,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1E]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[19F] a second internal screw guide having a second entry opening and a second exit opening, the second entry opening of the second internal screw guide formed at least partially in the top surface of the top wall and the second exit opening formed at least partially in the bottom surface of the top wall and at least partially in a second side surface of the top wall so as to extend in a direction different than that of the first internal	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1F]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.

Claims	Exemplary Citations to Prior Art
screw guide,	
[19G] an indentation in the top surface of the top wall extending between at least a portion of the first internal screw guide and the second internal screw guide, and	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1G]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[19H] a hole extending into the top wall at an angle that is perpendicular to the top surface of the top wall and at a position that is located in the indentation between the first internal screw guide and the second internal screw guide,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1H]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[19I] a first screw having a first screw head and a first threaded body that is sized and configured to be inserted through the first internal screw guide;	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1I]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[19J] a second screw having a second screw head and a second threaded body that is sized and configured to be inserted through the second internal screw guide; and	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1J]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.

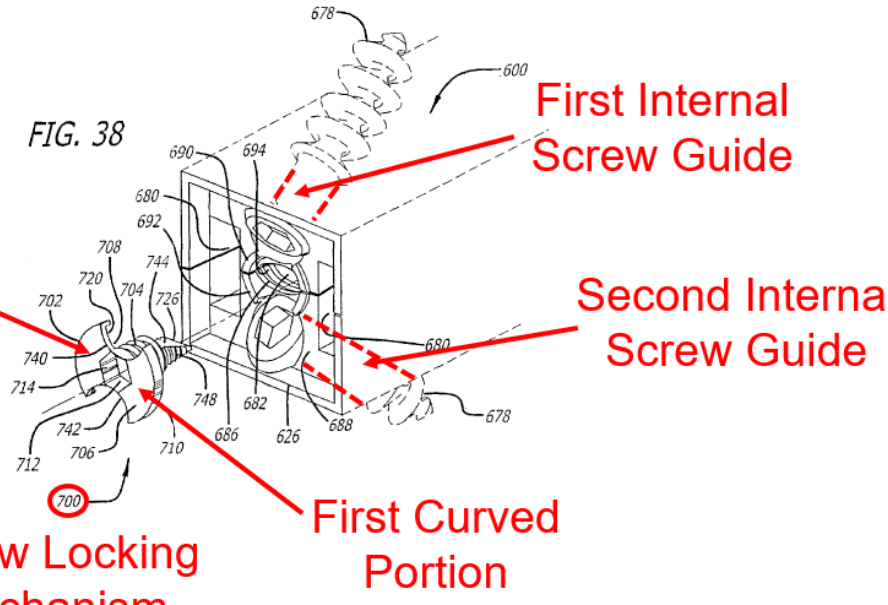
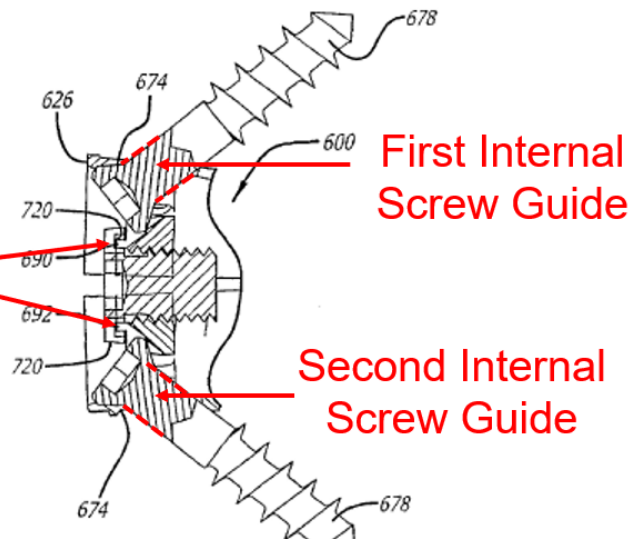
Claims	Exemplary Citations to Prior Art
[19K] a screw locking mechanism positioned in the indentation of the intervertebral spacer and extending at least partially into the hole,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1K]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[19L] wherein the screw locking mechanism has a central portion sized and configured to be inserted in the hole and has first and second side portions extending perpendicular to the hole so as to engage the first and second screws and secure the first and second screws in position when the first and second screws are inserted into the first and second internal screw guides.	Michelson discloses and/or suggests this limitation. For example, as shown in figures 38 and 41 below, end cap 700 (“screw locking mechanism”) has a stem 704 that projects from the center of head 702, and is designed for insertion into opening 682 (“hole”). Michelson at 24:5-20. Thus, the stem 704 is a “central portion sized and configured to be inserted in the hole.” <i>Id.</i> As also shown below, head 702 of end cap 700 includes side portions, <i>i.e.</i>, “first and second side portions,” defined by an upper cutout portion 740 and a lower cutout portion 742. <i>Id.</i> “Once bone screws 678 are inserted [in the screw holes], cap 700 [<i>sic</i>] may be rotated such that at least a portion of head 702 covers each of screws 678.” <i>Id.</i> at 24:5-11. That is, as shown below, side portions of head 702 “extend[] perpendicular to the hole so as to engage the first and second screws and secure the first and second screws in position when the first and second screws are inserted into the first and second internal screw guides.”  FIG. 38  FIG. 41 <i>Id.</i> at Figs. 38, 41 (both annotated). For the foregoing reasons, Michelson discloses and/or suggests this claim limitation.

Claims	Exemplary Citations to Prior Art
	To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
Claim 20	
[20A] An intervertebral combination internal screw guide and fixation apparatus configured to be inserted into a disc space between a first vertebral body and a second vertebral body and to provide fusion of the first vertebral body to the second vertebral body via biological bone fusion and screw fusion, the apparatus comprising:	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1A]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[20B] an intervertebral spacer including a top wall, a bottom wall, and first and second sidewalls, wherein the intervertebral spacer defines: an open space between the top, bottom, first, and second sidewalls capable of receiving bone filling for biological bone fusion,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1B]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[20C] a first slot on a first outer side of the first sidewall,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1C].

Claims	Exemplary Citations to Prior Art
	To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[20D] a second slot on a second outer side of the second sidewall of the two sidewalls, wherein the second slot is positioned opposite of the first slot, wherein the first slot is positioned along a first centerline axis that bisects the first side wall and wherein the second slot is positioned along a second centerline axis that bisects the second side wall,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1D]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[20E] a first internal screw guide having a first entry opening and a first exit opening, the first entry opening of the first internal screw guide formed at least partially in a top surface of the top wall and the first exit opening formed at least partially in a bottom surface of the top wall and at least partially in a first side surface of the top wall,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1E]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants' Invalidity Contentions Cover Pleading that disclose this limitation.
[20F] a second internal screw guide having a second entry opening and a second exit opening, the second entry opening of the	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1F].

Claims	Exemplary Citations to Prior Art
second internal screw guide formed at least partially in the top surface of the top wall and the second exit opening formed at least partially in the bottom surface of the top wall and at least partially in a second side surface of the top wall so as to extend in a direction different than that of the first internal screw guide,	To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[20G] an indentation in the top surface of the top wall extending between at least a portion of the first internal screw guide and the second internal screw guide, and	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1G]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[20H] a hole extending into the top wall at an angle that is perpendicular to the top surface of the top wall and at a position that is located in the indentation between the first internal screw guide and the second internal screw guide,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1H]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[20I] a first screw having a first screw head and a first threaded body that is sized and configured to be inserted through the first internal screw guide;	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1I]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of

Claims	Exemplary Citations to Prior Art
	the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[20J] a second screw having a second screw head and a second threaded body that is sized and configured to be inserted through the second internal screw guide; and	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1J]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[20K] a screw locking mechanism positioned in the indentation of the intervertebral spacer and extending at least partially into the hole,	Michelson discloses this limitation for at least the same reasons as those given above as to claim limitation [1K]. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.
[20L] wherein the screw locking mechanism comprises a first curved portion extending toward the first internal screw guide in engaging contact with the first screw when the first screw is inserted in the first internal screw guide and a second curved portion extending toward the second internal screw guide in engaging contact with the second screw when the second screw is inserted in the second internal screw guide.	Michelson discloses this limitation for reasons similar to those given above for claim 2 and limitation [19L]. <i>First</i>, as discussed above with respect to claim 2 and as shown in figure 38 below, in Michelson’s modified implant 200, head 702 of end cap 700 (“screw locking mechanism”) includes a “first curved portion extending toward the first internal screw guide” and “a second curved portion extending toward the second internal screw guide.” Michelson at 24:5-11; <i>see also id.</i> at 21:60-22:4.

Claims	Exemplary Citations to Prior Art
	<i>FIG. 38</i>  Second Curved Portion First Internal Screw Guide Second Internal Screw Guide Screw Locking Mechanism First Curved Portion <i>FIG. 41</i>  First and Second Curved Portions Extending Towards First and Second Screw Guides First Internal Screw Guide Second Internal Screw Guide

Claims	Exemplary Citations to Prior Art
	<i>Id.</i> at Figs. 38, 41 (both annotated). <i>Second</i>, as discussed above with respect to limitation [19L], and as shown above in figure 41, Michelson discloses that once the bone screws are inserted in the screw holes, the end cap 700 is rotated such that the curved portions of its head 702 cover the screws. <i>Id.</i> at 24:5-11. A POSITA would have understood that in this state, the curved portions of head 702 would have engaged contact with the respective screws being covered. This is because, as discussed above, one of the functions of end cap 700 is to “lock[] bone screws to the implant by blocking the exit path of the bone screws in a direction opposite to the direction of insertion.” <i>Id.</i> at 21:60-22:4. For the end cap 700 to lock the bone screws to the implant, it must be in engaging contact with the screws so it can prevent the screws from pulling out or backing out of the implant. Thus, Michelson discloses that the [first/second] curved portion extending toward the [first/second] internal screw guide is “in engaging contact with the [first/second] screw when the [first/second] screw is inserted in the [first/second] internal screw guide.” <i>Id.</i> For the foregoing reasons, Michelson discloses and/or suggests this claim limitation. To the extent Moskowitz argues this limitation is not disclosed or rendered obvious by Michelson, it would have been obvious to a person having ordinary skill in the art to modify Michelson or combine it with any of the other prior art references identified in Defendants’ Invalidity Contentions Cover Pleading that disclose this limitation.