„DEPARTMENT OF HEALTH & HUMAN SERVICES Public Health Service

Food and Drug Administration
10903 New Hampshire Avenue
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Silver Spring, MD 20993-0002

June 6, 2017

YOLO Medical, Inc.
% Paul Kramsky
President
Rockin' Regulatory, Inc.
21831 Tumbleweed Circle
Lake Forest, California 92630

Re: K170709
Trade/Device Name: CURVE Laser System
Regulation Number: 21 CFR 878.5400
Regulation Name: Low Level Laser System for Aesthetic Use
Regulatory Class: Class II
Product Code: OLI
Dated: March 6, 2017
Received: March 8, 2017

Dear Mr. Kramsky:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR

Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely,

Jennifer R. Stevenson -S3

For Binita S. Ashar, M.D., M.B.A., F.A.C.S.
Director
Division of Surgical Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: January 31, 2017
See PRA Statement below.

510(k) Number *(if known)*
TBD K170709

Device Name
CURVE Laser System

Indications for Use *(Describe)*

The CURVE Laser System is indicated for non-invasive aesthetic treatment for the temporary reduction in circumference of the waist.

Type of Use *(Select one or both, as applicable)*

☒ Prescription Use (Part 21 CFR 801 Subpart D) ☐ Over-The-Counter Use (21 CFR 801 Subpart C)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

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510(k) Summary for the CURVE Laser System

1. Submission Sponsor:

Yolo Medical Inc.
#245 - 1959 152nd Street
Surrey, British Columbia
V4A 9E3 CANADA
Telephone: 604-542-2200
Fax: 604-542-2205
FDA Establishment Registration #: 3008970597

2. Submission Correspondent:

Rockin' Regulatory, Inc.
21831 Tumbleweed Circle
Lake Forest, CA 92630
Telephone: 949-636-1464
Contact: Paul Kramsky, President
Email: pkramsky@cox.net

3. Date Prepared:

May 31, 2017

4. Device Name:

Trade/Proprietary Name:	CURVE Laser System
Common Name:	Low Level laser System (revised)
Classification Name:	Low Level Laser System for Aesthetic Use
Product Code:	OLI
Regulation Number:	878.5400
Device Class	II Special Controls
Review Panel:	General and Plastic Surgery

5. Substantial Equivalence:

The CURVE Laser System is substantially equivalent in terms of both intended

use and technological characteristics to the Yolo Medical's Lipofina Laser System, which was cleared for marketing under K143741 on April 24, 2015 for non-invasive aesthetic treatment for the temporary reduction in circumference of the waist.

6. Device Description:

The CURVE Laser System consists of a main console and 4 treatment paddles. The console houses the main electronics, controls and embedded software. The liquid crystal display (LCD) identifies all key treatment parameters. The main console is also equipped with a micro controller that provides automatic calculation of energy output for a specific set of treatment parameters. The treatment paddles are constructed so that each paddle contains 8 laser emission diode sources at a power output of 40mW per laser diode. These treatment paddles are non-thermal and non-invasive, at a wavelength of 630-680.

7. Indications for Use:

The CURVE Laser System is indicated for non-invasive aesthetic treatment for the temporary reduction in circumference of the waist.

8. Performance Data:

The CURVE Laser System was tested and demonstrated to be in compliance with IEC 60601-2-22, Medical Electrical Equipment, Particular Requirements for basic safety and essential performance of surgical, cosmetic, therapeutic and diagnostic laser equipment, IEC 60601-1 -- Medical electrical equipment Part 1: General requirements for basic safety and essential performance, and IEC 60601-1-2 -- Electromagnetic Compatibility (EMC) – Part 1: General Requirements for Safety; Electromagnetic compatibility.

9. Clinical Testing:

At the request of CDRH, a randomized, double blind clinical study was conducted in which 19 subjects were treated with the CURVE Laser System and 18 subjects received the control (sham) device. The CURVE successfully met the primary efficacy endpoint of this study, which was the achievement of at least 1 inch loss from baseline in averaged waistline measurement at the final

visit, with 100% of subjects receiving treatment with the CURVE device losing at least 1 inch in their waistline compared with 0 subjects in the arm receiving treatment with the sham device. In addition, no device-related AEs or deaths were reported for any subject during the course of this study. Taken together, these data demonstrate that the CURVE device safely and successfully reduces waistline circumference after a course of nine 20-minute treatments in a 3-week period.

10. Conclusions

Based on the technical comparison between the CURVE Laser System and the predicate Lipofina Laser System and the clinical data provided in this application, it can be concluded that the CURVE Laser System is Substantially Equivalent to the Lipofina Laser System.