

**510(k) Summary****FEB 01 2013****Owner's Name & Address:**

LDR Spine USA  
13785 Research Boulevard, Suite 200  
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**Contact Person:**

Bradley W. Strasser, RAC  
Regulatory Affairs Project Manager  
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**Date:**

January 28, 2013

**Review Panel:**

Orthopedic

**Common Name:**

Pedicle Screw Spinal System

**Classification:**

III/II

**Classification Name:**

Pedicle Screw Spinal System (per CFR 888.3070)

**Product Codes:**

NKB (per 21 CFR 888.3070)- Orthosis, spinal pedicle fixation, for degenerative disc disease  
MNH (per CFR 888.3070)- Orthosis, Spondilolisthesis, Spinal Fixation  
MNI (per CFR 888.3070)- Orthosis, Spinal Pedicle Fixation  
KWP (per CFR 888.3050)- Orthosis, Spinal Interlaminar Fixation

**Proprietary Name:**

LDR Spine Easyspine Posterior Spinal System

**Legally Marketed Predicate Device:**

LDR Spine Easyspine Posterior Spinal System

- K043094, cleared February 11, 2005
- K063794, cleared January 24, 2007
- K082592, cleared October 8, 2008
- K121103, cleared August 24, 2012

Synthes Spine Matrix System

- K100952, cleared August 5, 2010
- K092929, cleared December 29, 2009

**Device Description:**

The Easyspine Spinal System is a side-loading posterior spinal pedicle fixation system consisting of various implant components. The 4.25 mm pedicle screws and curved rods represent a line extension to the previously cleared Easyspine Spinal System (K043094, K063794, and K082592). The subject devices are identical to their predicates with respect to general technological characteristics and intended use.

**Indications for Use:**

The Easyspine® Posterior Spinal System is a posterior, non-cervical pedicle and non-pedicle system intended to provide immobilization and stabilization of spinal segments in skeletally-mature patients as an adjunct to fusion in the treatment of the following acute and chronic instabilities of the thoracic, lumbar and sacral spine:

- Degenerative disc disease (defined as back pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies.
- Spondylolisthesis
- Trauma (i.e., fracture or dislocation)
- Spinal stenosis
- Deformities or curvatures (i.e., scoliosis, kyphosis, and/or lordosis)
- Tumor
- Pseudoarthrosis
- Failed previous fusion

**Non-Clinical Testing:**

Non-clinical testing on the proposed Easyspine 4.25 mm pedicle screws included testing in Static and Dynamic Axial Compression and Static Torsion in accordance with (per ASTM F-1717) and Axial Gripping Capacity and Flexion-Extension Cantilever (per ASTM F-1798).

The results of this testing demonstrate that the performance of the proposed LDR Spine Easyspine implants, when compared with their legally marketed predicates, are substantially equivalent.

**Conclusion:**

The Easyspine Posterior Spinal System has demonstrated substantial equivalence to previously cleared devices with respect to its indications and fundamental scientific technology.



Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Center - WO66-G609  
Silver Spring, MD 20993-0002

LDR Spine USA  
% Bradley W. Strasser, RAC  
Regulatory Affairs Project Manger  
13785 Research Boulevard, Suite 200  
Austin, Texas 78750

Letter dated: February 1, 2013

Re: K123134

Trade/Device Name: Easyspine Posterior Spinal System  
Regulation Number: 21 CFR 888.3070  
Regulation Name: Pedicle screw spinal system  
Regulatory Class: Class III  
Product Code: NKB, MNH, MNI, KWP  
Dated: October 1, 2012  
Received: November 5, 2012

Dear Mr. Strasser:

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

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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 go to <http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm> for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR 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 Small Manufacturers, International and Consumer Assistance 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 yours,

**Mark N. Melkerson**

Mark N. Melkerson  
Director  
Division of Orthopedic Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

INDICATIONS FOR USE

510(k) Number (if known): **K123134**

Device Name: **Easyspine Posterior Spinal System**

Indications for Use:

The Easyspine<sup>®</sup> Posterior Spinal System is a posterior, non-cervical pedicle and non-pedicle system intended to provide immobilization and stabilization of spinal segments in skeletally-mature patients as an adjunct to fusion in the treatment of the following acute and chronic instabilities of the thoracic, lumbar and sacral spine:

- Degenerative disc disease (defined as back pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies)
- Spondylolisthesis
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- Tumor
- Pseudoarthrosis
- Failed previous fusion

Prescription Use  AND/OR Over-The-Counter Use

(Part 21 CFR 801 Subpart D)

(21 CFR 807 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

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Concurrence of CDRH, Office of Device Evaluation (ODE)

**Ronald P. Jean -S**

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(Division Sign-Off)

Division of Orthopedic Devices

510(k) Number: K123134