DEPARTMENT OF HEALTH & HUMAN SERVICES Public Health Service

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

July 7, 2017

Life Spine, Inc.
Randy Lewis
General Manger
13951 S Quality Drive
Huntley, Illinois 60142

Re: K171448
Trade/Device Name: Hammertoe Correction System
Regulation Number: 21 CFR 888.3040
Regulation Name: Smooth Or Threaded Metallic Bone Fixation Fastener
Regulatory Class: Class II
Product Code: HWC
Dated: May 16, 2017
Received: May 17, 2017

Dear Randy Lewis:

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,

Vincent J. Devlin -S

for

Mark N. Melkerson
Director
Division of Orthopedic 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)*
K171448

Device Name
Hammertoe Correction System

Indications for Use *(Describe)*

The Hammertoe Correction System is indicated for small bone reconstruction limited to inter-digital repair and fusion of the lesser toes.

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
Hammertoe Correction System

Submitted By: Life Spine, Inc.
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Fax: 847-884-6118

510(k) Contact: Randy Lewis
Life Spine
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Huntley, IL 60142
Telephone: 847-884-6117
Fax: 847-884-6118

Date Prepared: July 6th, 2017

Trade Name: Hammertoe Correction System

Common Name: Intramedullary Bone Screw

Regulation Name: Smooth or Threaded Metallic Bone Fixation Fastener

Classification: HWC, CFR 888.3040, Class II

Primary Predicate: Hammertoe Correction System (K153065)

Secondary Predicate: Extremity HammerFiX (K152710)
Arthrex BioPin (K050259)

Device Description:

The Life Spine Hammertoe Correction System is an implant with a dual threaded design and is inserted between the proximal and middle phalanges, so the opposing threads fixate on the phalangeal canal of the toe and compress the joint. The implant is fabricated and manufactured from the following:

1) Titanium (Ti 6A1-4V ELI)

All implants are intended for single use only and should not be reused under any circumstances. **Do not use any of the HAMMERTOE Correction System components with components from any other system or manufacturer. The HAMMERTOE Correction System implants should never be reused under any circumstances.**

Indications for Use of the Device:

The Hammertoe Correction System is indicated for small bone reconstruction limited to inter-digital repair and fusion of the lesser toes.

Technological Characteristics:
The Hammertoe Correction System is substantially equivalent to the predicate system in terms of design, indications for use and sizing.

Material:
The Hammertoe Correction System is 6AL-4V-ELI titanium manufactured according to ASTM F136. The device is comprised of either sterile or non-sterile titanium, single use implants.

Performance Data:
Finite Element Analysis, Engineering Rationale, Bench Top Validations and Bacterial Endotoxin Testing (BET) were included to demonstrate the substantial equivalency of the Hammertoe Correction System with respect to: torsional strength, bending strength, axial pullout, and driving torque.

Conclusion:
The information presented demonstrates the substantial equivalency of the Hammertoe Correction System.