



March 2, 2018

Newclip Technics
% J.D. Webb
Official Correspondent
The OrthoMedix Group, Inc.
1001 Oakwood Boulevard
Round Rock, Texas 78681

Re: K172485

Trade/Device Name: Footmotion HammerToe
Regulation Number: 21 CFR 888.3040
Regulation Name: Smooth Or Threaded Metallic Bone Fixation Fastener
Regulatory Class: Class II
Product Code: HTY
Dated: February 16, 2018
Received: February 20, 2018

Dear Mr. Webb:

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.

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.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/>) and CDRH Learn (<http://www.fda.gov/Training/CDRHLearn>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<http://www.fda.gov/DICE>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Mark N. Melkerson -S

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)
K172485

Device Name
Footmotion HammerToe

Indications for Use (Describe)

The implants of the Footmotion HammerToe range are intended for proximal interphalangeal arthrodeses of lesser toes in adults.

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.

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510 (k) Summary for the Footmotion HammerToe range

In accordance with 21 CFR 807.92 of the Federal Code of Regulations, the following 510(k) summary is submitted for the HammerToe system.

Summary preparation date: March, 2017

1. Submitter:

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Contact Person:

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1001 Oakwood Blvd
Round Rock, TX 78681
Telephone: 512-388-0199

2. Trade name:

Footmotion HammerToe

Common Name:

Smooth or threaded metallic bone fixation fastener.

Product code:

HTY

Classification Name:

Smooth or threaded metallic bone fixation fastener
(21 CFR part. 888.3040)

3. Primary predicate or legally marketed devices which are substantially equivalent:

- Memometal Intra-medullary Bone Fastener of MEMOMETAL TECHNOLOGIES (K070598 / K112197)
K112197 is a re-submission of K070598 after Memometal Smart Toe® intramedullary bone fastener line extension.



Secondary predicate or legally marketed devices which are substantially equivalent:

- Pro-Toe Vo Hammertoe Implant System of WRIGHT MEDICAL TECHNOLOGIES (K101165)
- Nextra Ti Hammertoe Correction System of NEXTREMITTY SOLUTION, INC (K122031)

Reference predicate or legally marketed devices which are substantially equivalent:

- Trim-it drill pin of ARTHREX (K050259)

4. Description of the device: The Footmotion HammerToe range consists of intramedullary implants designed for proximal interphalangeal arthrodeses of lesser toes in adults.

The Footmotion HammerToe range will be provided non sterile for sterilization by health care professionals prior to use or provided sterile by gamma sterilization.

Materials: Titanium alloy Ti-6Al-4V ELI (conform to ASTM F136-13 and ISO 5832-3).

Function: The implants of the Footmotion HammerToe range are intended for proximal interphalangeal arthrodeses of lesser toes in adults.

5. Substantial equivalence claimed to predicate devices:

The Footmotion HammerToe range is substantially equivalent to the predicate devices in terms of intended use, design, materials used, mechanical safety and performance.



6. Intended use:

The implants of the Footmotion HammerToe range are intended for proximal interphalangeal arthrodeses of lesser toes in adults.

7. Non-clinical Test Summary:

The following tests were conducted:

- Flexion tests
- Pull out tests

8. Clinical Test Summary:

No clinical studies were performed.

9. Conclusions Non-clinical and Clinical:

Newclip considers the Footmotion HammerToe range to be equivalent to the predicate devices listed above. This conclusion is based upon the device's similarities in principles of operation, technology, materials, and indications for use.