



August 31, 2018

Meditech Spine, LLC
Mr. Bruce Dunaway
Chief Design Engineer
1447 Peachtree Sreet NE, Suite 440
Atlanta, Georgia 30309

Re: K181543

Trade/Device Name: Cure™ OPEL-C Plate System
Regulation Number: 21 CFR 888.3060
Regulation Name: Spinal intervertebral body fixation orthosis
Regulatory Class: Class II
Product Code: KWQ
Dated: July 20, 2018
Received: July 20, 2018

Dear Mr. Dunaway:

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. Although this letter refers to your product as a device, please be aware that some cleared products may instead be combination products. The 510(k) Premarket Notification Database located at <https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm> identifies combination product submissions. 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) for

devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <https://www.fda.gov/CombinationProducts/GuidanceRegulatoryInformation/ucm597488.htm>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; 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 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,

Ronald P. Jean -S

for 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)

K181543

Device Name

Cure™ OPEL-C Plate System

Indications for Use (Describe)

The Cure™ OPEL-C System is intended for anterior screw fixation to the C2 to C7 levels of the cervical spine. The system is indicated for use in skeletally mature patients for temporary stabilization of the anterior spine during the development of cervical spine fusion in patients with Degenerative Disc Disease (as defined by neck pain of discogenic origin with degeneration of the disc confirmed by patient history and radiographic studies), Spondylolisthesis, Trauma (i.e., fractures or dislocations), Deformity (defined as kyphosis, lordosis, or scoliosis), Pseudarthrosis, and Failed previous fusions.

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

Meditech Spine, LLC is requesting marketing clearance for the Cure™ OPEL-C System

- A. Sponsor/Manufacturer: Meditech Spine, LLC
Registration Number: 3009405289
Bruce Dunaway, Chief Design Engineer
1447 Peachtree St NE Suite 440
Atlanta, GA 30309
678-974-5287 Phone
404-759-2104 Fax
- B. Trade Name: Cure™ OPEL-C Plate System
Common Name: Spinal Implant
Classification Name: Spinal intervertebral body fixation orthosis (21 CFR 888.3060 Class II, Product Code KWQ)
- C. Predicate Device: K160604 (Cure™ Anterior Cervical Plate System)

D. Device Description:

The Cure™ OPEL-C (T) and Cure™ OPEL-C (S) are available in a range of lengths to coincide with the surgical approach and screws that are available in multiple lengths and diameters.

The Cure™ OPEL-C Plate System is manufactured from Grade 23 Titanium (Ti-6Al-4V ELI); manufactured according to ASTM F136 Standard Specification for Wrought Titanium-6Aluminum-4Vanadium ELI (Extra Low Interstitial) Alloy (UNS R56401) for Surgical Implant Applications.

E. Indications for Use:

The Cure™ OPEL-C System is intended for anterior screw fixation to the C2 to C7 levels of the cervical spine. The system is indicated for use in skeletally mature patients for temporary stabilization of the anterior spine during the development of cervical spinal fusion in patients with Degenerative Disc Disease (as defined by neck pain of discogenic origin with degeneration of the disc confirmed by patient history and radiographic studies), Spondylolisthesis, Trauma (i.e., fractures or dislocations), Deformity (defined as kyphosis, lordosis, or scoliosis), Pseudarthrosis, and Failed previous fusions.

F. Technological Characteristics:

The Cure™ OPEL-C (T) and (S) are similar geometrically to the predicate device (thickness, size envelope). The central locking mechanism of the Cure™ OPEL-C (T) and (S) used to prohibit bone screw back out is identical to that of the predicate device. Additionally, the bone screws and supporting instrumentation utilized are identical to those of the predicate device.

Differences between the Cure™ OPEL-C (T) and (S) and the predicate device exist exclusively on the posterior side of the subject devices. An offset shelf and a pair of 2mm posts appropriately sized to interface with Talos® -C interbodies have been implemented on the Cure™ OPEL-C (T) and (S) to facilitate ideal alignment during an ACDF. Additionally there is an absence of graft windows, an increase in maximum screw angulation (27°) and a decrease in axial radius (20mm) on the subject devices.

The fundamental technological characteristics of the Cure™ OPEL-C (T) and (S) are identical to the predicate device.

G. Non-clinical Testing:

An engineering analysis was performed on the Cure™ OPEL-C (T) and (S) to demonstrate equivalency to the previously tested predicate device with respect to static compression bending, static tension, and dynamic compression bending per ASTM F1717.

Cure™ OPEL-C (T) and (S) Anterior Cervical Plates are superior in mechanical function to the predicate device.

H. Conclusion:

The identical intended use and consistency between the fundamental scientific technology between the Cure™ OPEL-C (T) and Cure™ OPEL-C (S) allows that both are substantially equivalent to the predicate device.