

JUL 11 2005

**510(k) Summary**

**Submitter:** ClearMedical, Inc.  
1776 136<sup>th</sup> Place NE  
Bellevue, WA 98005

**Contact:** Gene Lim  
Ph: (425) 460-2779  
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**Trade name:** ClearMedical Reprocessed Multiple Clip Appliers

**Common name:** Non-reloadable Multiple Clip Appliers

**Classification name:** Manual surgical instrument for general use (21 CFR 878.4800)

**Product code:** GDO – Applier, Surgical, Clip

**Predicate device:** K771412 – Ethicon Ligaclip MCA clip appliers

**Device description:** The reprocessed multiple clip applier is an automatic ligating clip applier. The device is preloaded with a minimum of 10 titanium ligating clips that individually advance after each clip application.

**Intended use:** Reprocessed multiple clip appliers are intended for the ligation of vessels or other tubular structures.

**Technological characteristics:** Reprocessed multiple clip appliers are used devices that are cleaned, inspected, tested, packaged, and sterilized for an additional single patient use. The technological characteristics of design, material, and functional performance of reprocessed multiple clip appliers are unchanged and remain equivalent to the predicate devices.

**Test data:** Validation of cleaning, performance, packaging, and sterilization together with biocompatibility testing demonstrate reprocessed clip appliers perform as intended and are safe and effective.

**Conclusion:** Based on information provided in this submission, ClearMedical Reprocessed Clip Appliers are substantially equivalent to the identified predicate devices and are safe and effective for their intended use.



OCT 16 2006

Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

Clear Medical Corporation  
% Mr. Mike Kovacs  
1776 136<sup>th</sup> Place Northeast  
Bellevue, Washington 98005

Re: K033579

Trade/Device Name: Reprocessed Multiple Clip Appliers Models, MCL20, MCM20,  
MCM30, MCS20

Regulation Number: 21 CFR 878.4300

Regulation Name: Implantable clip

Regulatory Class: II

Product Code: NMJ

Dated: July 11, 2005

Received: May 31, 2005

Dear Mr. Kovacs:

This letter corrects our substantially equivalent letter of July 11, 2005.

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 (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.

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); 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.

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This letter will allow you to continue marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276- 0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). 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 (240) 276-3150 or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>

Sincerely yours,



Mark N. Melkerson  
Director  
Division of General, Restorative  
and Neurological Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

### Indications for Use

510(k) Number (if known): K033579

Device Name: Ethicon Ligaclip Multiple Clip Appliers

Indications for Use:

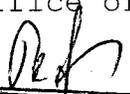
The Ethicon Ligaclip Multiple Clip Appliers are instruments used for ligation of tubular structures and vessels.

Prescription Use   X   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)

  
**(Division Sign-Off)**  
**Division of General, Restorative,  
and Neurological Devices**

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Device Listing:

MCL20  
MCM20  
MCM30  
MCS20