

DEC 5 2005

**510(k) SUMMARY**  
**MANI Needle and Suture Pack**  
**MANI, Inc.**

This 510(k) summary of safety and effectiveness for the MANI Needle and Suture Pack (Poly(ethylene terephthalate)) is submitted in accordance with the requirements of SMDA and follows Office of Device Evaluation guidance concerning the organization and content of a 510(k) summary.

Applicant: MANI, Inc.

Address: 743 Nakaakutsu Takanezawa-Machi  
Tochigi 329-1234 Japan (Headquarters)

Contact Person: David J. Bloch  
Regulatory Counsel

Telephone: (202) 414-9209 (telephone)  
(202) 414-9209 (fax)

Preparation Date: January 2005

Device Trade Name: MANI Needle and Suture Pack (Poly(ethylene terephthalate))

Common Name: Guide Needle, Surgical; Non-Absorbable Suture, Poly(ethylene terephthalate).

Classification Name: Guide Needle, Surgical; (see 21 C.F.R. § 878.4493)  
Non-Absorbable Suture, Poly(ethylene terephthalate)  
(21 C.F.R. § 878.5000)

Product Code: GAT

Predicate Devices: CP Medical, Orthofiber, 510(k) # 041894;

Device Description: The MANI Needle & Suture Pack (Poly(ethylene terephthalate)) consists of a stainless steel needle and poly(ethylene terephthalate) suture, for use in short term soft tissue approximation, including use in ophthalmic surgery.

Intended Use: The MANI Needle & Suture Pack (Poly(ethylene terephthalate)) is intended for use in short term soft tissue approximation, including use in ophthalmic surgery.

CONCLUSIONS: Based on the foregoing and other information in this application, MANI, Inc. believes that the MANI Needle & Suture Pack (Poly(ethylene terephthalate)) is substantially equivalent to its claimed predicates under conditions of intended use.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

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Mani, Inc.  
c/o David J. Bloch, Esq.  
Regulatory Counsel  
Reed Smith, LLP  
1301 K Street, N.W.  
Suite 1100-East Tower  
Washington, D.C. 20005-3373

Re: K050150

Trade/Device Name: MANI Needle & Suture Pack (Poly(ethylene terephthalate))  
Regulation Number: 21 CFR 878.5000  
Regulation Name: Nonabsorbable poly(ethylene terephthalate) surgical suture  
Regulatory Class: II  
Product Code: GAT, GDL  
Dated: November 9, 2005  
Received: November 9, 2005

Dear Mr. Bloch:

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.

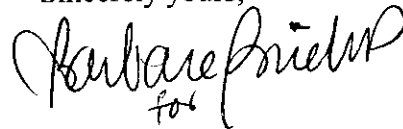
If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish 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.

This letter will allow you to begin 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 (301) 443-6597 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mark N. Melkerson" with a stylized flourish at the end. Below the signature, the word "for" is written in a smaller, cursive script.

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

Enclosure

### Indications for Use

510(k) Number (if known): K050150

Device Name: MANI Needle & Suture Pack (Poly(ethylene terephthalate))

Indications For Use:

The MANI Needle & Suture Pack (Poly(ethylene terephthalate)) is intended for use in short term soft tissue approximation, including use in ophthalmic surgery.

Prescription Use  X   
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use \_\_\_\_\_  
(21 CFR 807 Subpart C)

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

Concurrence of CDRH, Office of Device Evaluation (ODE)

*Barbara Buchard*

**(Division Sign-Off)**

**Division of General, Restorative,  
and Neurological Devices**

510(k) Number K050150