510(k) Summary of Safety and Effectiveness

[in accordance with SMDA of 1990, 21 CFR 807.92(c)]

K070460

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Contact:

Mr. Hartmut Loch, RAC
Regulatory Consultant
Official FDA Correspondent
c/o Allez Spine, LLC.
2301 DuPont Drive, Suite 510
Irvine, CA 92612

Trade name: *ALLEZ SPINE Cross Connectors*

Common name: Spinal Fixation Cross Connector

Classification name: Appliance, Fixation, Spinal Intervertebral - § 888.3060 (KWQ, KWP)
Orthosis, Spinal Pedicle Fixation - § 888.3070 (MNI, NKB)
Orthosis, SpondylolisthesisSpinal Fixation - § 888.3070 (MNH)

Class III, Orthopedic Device Panel 87

Product Code: KWQ, MNI, KWP, NKB & MNH

Device Description and Characteristics: The *ALLEZ SPINE Cross Connectors* are intended to help provide correction, immobilization and stabilization of spinal segments as an adjunct to fusion of the thoracic, lumbar and/or sacral space in conjunction with the Allez Spine Laguna Polyaxial Pedicle Screw System.

The Laguna Spinal System consists of a variety of rods and screws, which can be rigidly locked into a variety of configurations, with each construct being tailor made for the individual case. The Allez Spine Laguna Polyaxial Pedicle Screw System (K050060) was cleared for marketing on May 4, 2005.

The *ALLEZ SPINE Cross Connectors* are available in three sizes: small (37 mm), medium (50 mm) and large (80 mm) and are fabricated from medical grade titanium alloy described by such standards as ASTM F136 or ISO 5832-3 or 5832-2.

Equivalence: Allez Spine *ALLEZ SPINE Cross Connectors* is substantially equivalent to the Blackstone Spinal Fixation System, Second-Generation Cross-Connector

K003735 S/E May 8, 2001

Indications: The *ALLEZ SPINE Cross Connectors* are intended for posterior, non-cervical fixation in conjunction with the Allez Spine Laguna Pedicle Screw System for the following conditions: degenerative disc disease (defined as back pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies); spondylolisthesis; trauma (i.e.fracture or dislocation); spinal stenosis; curvatures (i.e.scoliosis, kyphosis and/or lordosis); tumor pseudarthrosis; and/or failed previous fusion.

Performance data: Biomechanical tests have been performed. The test results were equivalent to other similar implants and are sufficient for *in vivo* loading.

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
9200 Corporate Boulevard
Rockville MD 20850

Allez Spine, L.L.C.
c/o Mr. Hartmut Loch
Regulatory Consultant
2301 Dupont Drive, Suite 510
Irvine, California 92612

JUN 11 2007

Re: K070460
Trade/Device Name: Allez Spine Cross Connectors
Regulation Number: 21 CFR §888.3070
Regulation Name: Pedicle Screw Spinal System
Regulatory Class: Class III
Product Code: NKB, MNI, MNH, KWP and KWQ
Dated: April 24, 2007
Received: April 27, 2007

Dear Mr. Loch:

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.

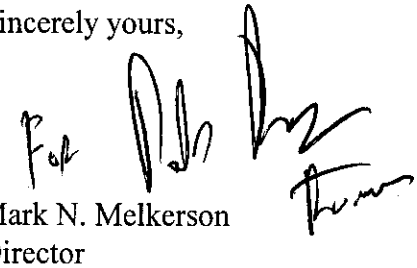
If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish 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) 276-0120. 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/industry/support/index.html.

Sincerely yours,



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

Enclosure

510(k) Number: **K070460**

Device Name(s):

ALLEZ SPINE Cross Connectors

Indications for Use:

The *LAGUNA SPINAL SYSTEM* is intended for posterior, non-cervical pedicle fixation for the following conditions: degenerative disc disease (defined as back pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies); spondylolisthesis; trauma (i.e.fracture or dislocation); spinal stenosis; curvatures (i.e.scoliosis, kyphosis and/or lordosis); tumor pseudarthrosis; and/or failed previous fusion.

Prescription Use X OR Over-The-Counter-Use _____

(Per 21 CFR 801.109) (Optional format 1-2-96)

PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NECESSARY

Concurrence of CDRH, Office of Device Evaluation (ODE)

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

510(k) Number K070460