MEDTRONIC Sofamor Danek
PYRAMID® +4 Anterior Lumbar Plate System 510(k) Summary
January 2008

I. Company: Medtronic Sofamor Danek, Inc.
1800 Pyramid Place
Memphis, Tennessee 38132
(901) 396-3133

Contact: Lila Joe
Associate Regulatory Affairs Specialist

II. Product Name: PYRAMID® +4 Anterior Lumbar Plate System
Classification Name: Spinal Intervertebral Body Fixation Orthosis
Class II Product Code: KWQ
21 CFR: 888.3060

III. Description: The subject device represents an expansion of the PYRAMID® +4
ANTERIOR LUMBAR PLATE System. This system consists of a series of 3-hole and
4-hole plates as well as bone screws in a variety of sizes. The 3-hole plates are intended
for use as an anterior fixation device while the 4-hole plates are intended for use as an
anterior lateral fixation device. The system incorporates a locking mechanism to prevent
the bone screws from backing out by covering the bone screw heads. Like its predicate
counterpart, the subject device is intended for use as an anterior fixation device to
supplement an anterior lumbar interbody fusion. The variety of the PYRAMID® +4
ANTERIOR LUMBAR PLATE System provides surgeons with options in the placement
of the device to avoid interference with the vasculature, while still allowing for fixation.
The PYRAMID® +4 ANTERIOR LUMBAR PLATE components are made of titanium
alloy.

IV. Indications for Use: The Medtronic Spinal and Biologics PYRAMID® +4 ANTERIOR
LUMBAR PLATE Fixation System is indicated for use as a supplemental fixation device
for the lumbosacral level, anterior below the bifurcation (L5-S1) of the vascular
structures or anterior lateral above the bifurcation (L1-L5) of the vascular structures.
When properly used, this system will help provide temporary stabilization until a solid
spinal fusion develops. Specific indications include: 1) Degenerative disc disease (as
defined by back pain of discogenic origin with degeneration of the disc confirmed by
history and radiographic studies); 2) Pseudoarthrosis; 3) Spondylolysis; 4)
Spondylolisthesis; 5) Fracture; 6) Neoplastic disease; 7) Unsuccessful previous fusion surgery; 8) Lordotic deformities of the spine; 9) Idiopathic thoracolumbar or lumbar scoliosis; 10) Deformity (i.e., scoliosis, lordosis, and/or kyphosis) associated with deficient posterior elements such as that resulting from laminectomy, spina bifida, or myelomenigocele; and/or 11) Neuromuscular deformity (i.e., scoliosis, lordosis, and/or kyphosis) associated with pelvic obliquity.

V. **Substantial Equivalence:** Documentation, including mechanical test results, provided has demonstrated that the PYRAMID® +4 Anterior Lumbar Plate System is substantially equivalent to similar previously cleared devices such as the PYRAMID® Anterior Plate Fixation System (K013665, SE 12/29/2002) and PYRAMID® +4 Anterior Lumbar Plate System (K071416, SE 11/1/2007).
Medtronic Sofamor Danek USA, Inc.
% Ms. Michelle Willis
1800 Pyramid Place
Memphis, TN 38132

Re: K080429
Trade/Device Name: PYRAMID® +4 Anterior Lumbar Plate System
Regulation Number: 21 CFR 888.306
Regulation Name: Spinal intervertebral body fixation orthosis
Regulatory Class: Class II
Product Code: KWQ
Dated: April 11, 2008
Received: April 14, 2008

Dear Ms. Willis:

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 recategorized 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 Center for Devices and Radiological Health’s (CDRH’s) Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, “Misbranding by reference to premarket notification” (21CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH’s Office of Surveillance and Biometric’s (OSB’s) Division of Postmarket Surveillance at (240) 276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at (240) 276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at toll-free number (800) 638-2041 or (240) 276-3150 or the 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
Device Name: PYRAMID® +4 Anterior Lumbar Plate System

Indications for Use:
The Medtronic Spinal and Biologics PYRAMID® +4 ANTERIOR LUMBAR PLATE Fixation System is indicated for use as a supplemental fixation device for the lumbosacral level, anterior below the bifurcation (L5-S1) of the vascular structures or anterior lateral above the bifurcation (L1-L5) of the vascular structures. When properly used, this system will help provide temporary stabilization until a solid spinal fusion develops. Specific indications include: 1) Degenerative disc disease (as defined by back pain of discogenic origin with degeneration of the disc confirmed by history and radiographic studies); 2) Pseudoarthrosis; 3) Spondylolysis; 4) Spondylolisthesis; 5) Fracture; 6) Neoplastic disease; 7) Unsuccessful previous fusion surgery; 8) Lordotic deformities of the spine; 9) Idiopathic thoracolumbar or lumbar scoliosis; 10) Deformity (i.e., scoliosis, lordosis, and/or kyphosis) associated with deficient posterior elements such as that resulting from laminectomy, spina bifida, or myelomeningocele; and/or 11) Neuromuscular deformity (i.e., scoliosis, lordosis, and/or kyphosis) associated with pelvic obliquity.

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)

Concurrence of CDRH, Office of Device Evaluation (ODE)

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

510(k) Number K080429