July 28, 2022

Nexxt Spine LLC
% Karen Warden
President
BackRoads Consulting Inc.
PO Box 566
Chesterland, Ohio 44026

Re: K221905
Trade/Device Name: INERTIA CONNEXX Modular Pedicle Screw System
Regulation Number: 21 CFR 888.3070
Regulation Name: Thoracolumbosacral Pedicle Screw System
Regulatory Class: Class II
Product Code: NKB
Dated: June 29, 2022
Received: June 30, 2022

Dear Karen Warden:

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/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products); 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 https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance) and CDRH Learn (https://www.fda.gov/training-and-continuing-education/cdrh-learn). 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 (https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

for

Colin O'Neill, M.B.E.
Assistant Director
DHT6B: Division of Spinal Devices
OHT6: Office of Orthopedic Devices
Office of Product Evaluation and Quality
Center for Devices and Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: 06/30/2020
See PRA Statement below.

510(k) Number *(if known)*
K221905

Device Name
INERTIA® CONNEXX™ Modular Pedicle Screw System

Indications for Use *(Describe)*
The INERTIA® CONNEXX™ Modular Pedicle Screw System is intended for immobilization and stabilization of the posterior non-cervical spine (Tl-S2/Ilium) in skeletally mature patients as an adjunct to fusion for the following indications: 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, or lordosis), tumor, pseudarthrosis, and/or failed previous fusion.

When used for posterior non-cervical pedicle screw fixation in pediatric patients, the INERTIA® CONNEXX™ Modular Pedicle Screw System implants are indicated as an adjunct to fusion to treat adolescent idiopathic scoliosis. The INERTIA® CONNEXX™ Modular Pedicle Screw System is to be used with autograft and/or allograft. Pediatric pedicle screw fixation is limited to a posterior approach.

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.

510(k) Summary

Date:	28 July 2022
Sponsor:	Nexxt Spine, LLC 14425 Bergen Blvd, Suite B Noblesville, IN 46060 Office: 317.436.7801 Fax: 317.245.2518
Sponsor Contact:	Andy Elsbury, President
510(k) Contact:	Karen E. Warden, PhD BackRoads Consulting Inc. PO Box 566 Chesterland, OH 44026 Office: 440.729.8457
Proposed Trade Name:	INERTIA® CONNEXX™ Modular Pedicle Screw System
Common Name:	Posterior pedicle screw system
Regulatory Class:	Class II
Regulation Name:	Thoracolumbosacral pedicle screw system
Regulation Number:	21 CFR 888.3070
Product Code:	NKB
Submission Purpose:	The subject 510(k) adds rods and modular pedicle screws to the INERTIA® Pedicle Screw System.
Device Description:	The INERTIA® CONNEXX™ Modular Pedicle Screw System consists of longitudinal members (rods), anchors (pedicle screws) and fasteners in a variety of sizes to accommodate differing anatomic requirements. The INERTIA® CONNEXX™ Modular Pedicle Screw System implants are sold sterile and non-sterile.
Indications for Use:	The INERTIA® CONNEXX™ Modular Pedicle Screw System is intended for immobilization and stabilization of the posterior non-cervical spine (T1-S2/Ilium) in skeletally mature patients as an adjunct to fusion for the following indications: 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, or lordosis), tumor, pseudarthrosis, and/or failed previous fusion. When used for posterior non-cervical pedicle screw fixation in pediatric patients, the INERTIA® CONNEXX™ Modular Pedicle Screw System implants are indicated as an adjunct to fusion to treat adolescent idiopathic scoliosis. The INERTIA® CONNEXX™ Modular Pedicle Screw System is to be used with autograft and/or allograft. Pediatric pedicle screw fixation is limited to a posterior approach.
Materials:	INERTIA® CONNEXX™ implants are manufactured from Ti6Al4V ELI titanium alloy (ASTM F136).
Primary Predicate:	INERTIA® Pedicle Screw and Deformity Correxxion™ System (Nexxt Spine, LLC – K153453)
Additional Predicates:	Mesa Spinal System (K2M, Inc. – K143334), CD Horizon® Spinal System (Medtronic Sofamor Danek – K152457), INERTIA® Pedicle Screw System (Nexxt Spine, LLC – K090984, K101278, K132412 [MIS], K141376)]

Performance Data: Mechanical testing of worst case INERTIA® CONNEXX™ constructs included static and dynamic compression bending and static torsion according to ASTM F1717 and tulip dissociation per ASTM F1798. The results demonstrate that INERTIA® CONNEXX™ Modular Pedicle Screw System performance is substantially equivalent to the predicate devices. In addition, bacterial endotoxin testing was conducted in accordance with AAMI ST72.

Technological Characteristics: The INERTIA® CONNEXX™ devices possess the same technological characteristics as one or more of the predicate devices. These include:

- performance (as described above),
- basic design (rod and screw configuration),
- material (titanium alloy) and
- size (dimensions are comparable to those offered by the cleared devices).

Therefore the fundamental scientific technology of the INERTIA® CONNEXX™ Modular Pedicle Screw System devices is the same as previously cleared devices.

Conclusion: The INERTIA® CONNEXX™ devices possesses the same intended use and technological characteristics as the predicate devices. Therefore the INERTIA® CONNEXX™ Modular Pedicle Screw System is substantially equivalent for its intended use.