



March 4, 2020

Vascular Medcure, Inc.  
% Janice Hogan  
Regulatory Counsel  
Hogan Lovells US LLP  
1735 Market Street, Suite 2300  
Philadelphia, Pennsylvania 19103

Re: K200314  
Trade/Device Name: Capere Thrombectomy System  
Regulation Number: 21 CFR 870.5150  
Regulation Name: Embolectomy Catheter  
Regulatory Class: Class II  
Product Code: QEW, KRA  
Dated: February 6, 2020  
Received: February 6, 2020

Dear Ms. Hogan:

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](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Gregory O'Connell  
Assistant Director  
DHT2C: Division of Coronary  
and Peripheral Intervention Devices  
OHT2: Office of Cardiovascular Devices  
Office of Product Evaluation and Quality  
Center for Devices and Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known)  
K200314

Device Name  
CAPERE® Thrombectomy System

### Indications for Use (Describe)

The CAPERE® Thrombectomy System is indicated for:

- Non-surgical removal of soft emboli and thrombi from blood vessels.
- Injection, infusion and/or aspiration of contrast media and other fluids into blood vessel.

The CAPERE® Thrombectomy System is intended only for use in the peripheral vasculature and is not intended for use in the pulmonary arteries.

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.

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**K200314 - 510(k) SUMMARY**

**Vascular Medcure, Inc.'s CAPERE<sup>®</sup> Thrombectomy System**

**Submitter's Name, Address, Telephone Number, Contact Person and Date Prepared**

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Vascular Medcure, Inc.  
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Date Prepared: February 20, 2020

**Name of Device**

CAPERE<sup>®</sup> Thrombectomy System

**Common or Usual Name**

Embolectomy Catheter

**Classification**

21 CFR 870.5150, Class II, product code QEW, KRA

**Predicate Devices**

CAPERE<sup>®</sup> Thrombectomy System (K180722)

**Intended Use / Indications for Use**

The CAPERE<sup>®</sup> Thrombectomy System is indicated for:

- Non-surgical removal of soft emboli and thrombi from blood vessels.
- Injection, infusion and/or aspiration of contrast media and other fluids into blood vessel.

The CAPERE<sup>®</sup> Thrombectomy System is intended only for use in the peripheral vasculature and is not intended for use in the pulmonary arteries.

**Device Description**

The CAPERE<sup>®</sup> Thrombectomy System primarily consists of an 12Fr Delivery Catheter and 15Fr Guide Catheter. The CAPERE<sup>®</sup> Thrombectomy System is delivered percutaneously via transfemoral or jugular venous access. Once delivered, the System's fine mesh nitinol wire basket is used to capture and mechanically remove emboli and thrombi. The CAPERE<sup>®</sup> System does not use aspiration to pull out the thrombus but does have a side port in the funnel catheter that allows aspiration or injection of saline or fluids if needed.

## Technological Characteristics

The CAPERE® Thrombectomy System has the same technological characteristics as its predicate device CAPERE Thrombectomy Catheter (K180722). Both CAPERE® Thrombectomy Systems have either the same components or substantially equivalent components (length change). Each device system includes a guide catheter, delivery catheter, and a mechanism for capturing/removing the soft emboli or thrombi. The predicate and CAPERE® Thrombectomy System both use a 12Fr delivery catheter. The CAPERE® Thrombectomy System utilizes a 15Fr guide catheter while the predicate utilizes a 20Fr guide catheter. In addition, both systems use 0.035" guidewires during the procedure.

The CAPERE® System includes a Guide Catheter and a Delivery Catheter. In the same manner as the previously cleared device, the Guide Catheter and Delivery Catheter are advanced to the therapy site. The funnel of the Guide Catheter is unsheathed, and the Delivery Catheter is then advanced passed the obstruction. A nitinol basket connected to the Delivery Catheter is deployed by retracting the outer sheath of the catheter.

To capture the soft emboli or thrombi ("clot"), the deployed basket is retracted while simultaneously being extended to surround and capture the length of the clot. The Delivery Catheter and clot-load is then retracted into the funnel of the Guide Catheter where the clot is captured and can be removed.

The basket design in the CAPERE® Thrombectomy Systems is exactly the same (nitinol, 18mm diameter, 11.4cm length) as the basket design in the predicate.

Therefore, the subject CAPERE® Thrombectomy System has the same technological characteristics as its predicate.

## Performance Data

The following nonclinical performance testing has been conducted, using the established test methods used in the cleared predicate device, to support the substantial equivalence of the CAPERE® Thrombectomy System to its predicate device. In all instances, the CAPERE® Thrombectomy System functioned as intended under the previously established test methods.

- Biocompatibility of the patient-contacting components of the device was confirmed as there are no differences between the materials in the CAPERE® Thrombectomy System and the predicate.
- Packaging of the CAPERE® Thrombectomy System is the same as the predicate, therefore, the predicate package integrity and accelerated aging studies demonstrate that the packaging was capable of maintaining a sterile barrier and protecting the device after 2X EO sterilization, simulated handling and shipping, environmental conditioning, and 6-months of accelerated aging in support of a 6-month shelf-life.
- Functional bench testing was conducted (including demonstrated compliance with relevant standards such as ISO 10555-1 and ISO 594-2) on the bond joints affected by the reduced diameter of the CAPERE® Thrombectomy System with respect to the predicate and demonstrated that the CAPERE® Thrombectomy System maintained the predicate characteristics.
- Simulated Use Testing was completed to demonstrate that simulated clot can be retrieved under simulated conditions without capture basket rupture, catheter

damage, or other adverse device effect and confirmed that the predicate characteristics were maintained.

### **Substantial Equivalence**

The CAPERE<sup>®</sup> Thrombectomy System has the same intended use and indications for use, technological characteristics, and principles of operation as its predicate devices. Nonclinical testing, including functional testing and simulated use testing demonstrated that the minor differences between the device and predicate (i.e. device diameter and lengths) do not raise new types of safety or effectiveness questions. Thus, the CAPERE<sup>®</sup> Thrombectomy System is substantially equivalent to the predicate devices.

### **Conclusion**

Vascular Medcure's CAPERE<sup>®</sup> is an Embolectomy Catheter, Class II device that has been evaluated in nonclinical testing in accordance with FDA's recognized standards and pre-established acceptance criteria. Testing demonstrated that the device performs as intended. The CAPERE<sup>®</sup> is substantially equivalent to its predicate devices.