August 28, 2023

Skeletal Dynamics Inc
Alexandra Rodriguez Rojas
Regulatory Affairs Manager
7300 North Kendall Drive
Miami, Florida 33156

Re: K231623
Trade/Device Name: Distal Elbow Plating System
Regulation Number: 21 CFR 888.3030
Regulation Name: Single/Multiple Component Metallic Bone Fixation Appliances And Accessories
Regulatory Class: Class II
Product Code: HRS, HWC
Dated: June 2, 2023
Received: June 2, 2023

Dear Alexandra Rodriguez Rojas:

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,

Shumaya Ali -S

Shumaya Ali, M.P.H.
Assistant Director
DHT6C: Division of Restorative, Repair
and Trauma 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: 06/30/2023
See PRA Statement below.

510(k) Number *(if known)*
K231623

Device Name

Distal Elbow Plating System

Indications for Use *(Describe)*

The Skeletal Dynamics Distal Elbow Plating System is indicated for fixation of fractures, fusions, osteotomies and non-unions of the radius and ulna, particularly in osteopenic bone.

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.

This section applies only to requirements of the Paperwork Reduction Act of 1995.

DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.

The burden time for this collection of information is estimated to average 79 hours per response, including the time to review instructions, search existing data sources, gather and maintain the data needed and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden, to:

Department of Health and Human Services
Food and Drug Administration
Office of Chief Information Officer
Paperwork Reduction Act (PRA) Staff
PRAStaff@fda.hhs.gov

"An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB number."

510(k) SUMMARY

Submitter
Skeletal Dynamics, Inc.
7300 N. Kendall Drive
Suite 400
Miami, FL 33156
Phone: 305-596-7585
Facsimile: 305-596-7591
Contact Person: Alexandra Rodriguez Rojas
Date Prepared: August 11, 2023

Name and Classification

Trade Name:	Distal Elbow Plating System
Common Name:	Plate, fixation, bone (Primary) Screw, Fixation, Bone
Classification Name:	Single/Multiple Component Metallic Bone Fixation Appliances and Accessories (Primary) Smooth or threaded metallic bone fixation fastener
Classification Number:	21 CFR §888.3030 (Primary) 21 CFR §888.3040
Device Class:	Class II
Product Code:	HRS (Primary) HWC

Primary Predicate Device
K171590 -Distal Elbow Plating System (Skeletal Dynamics)
Additional Predicate Devices
K140892 - Distal Elbow Plating System (Skeletal Dynamics)
K082300 - Anatomic Locking Plating System (Depuy Orthopaedics)

Device Description
The predicate Skeletal Dynamics Distal Elbow Plating System (K171590) consists of medical grade titanium alloy radial head plates, proximal ulna plates, double hockey stick, Y and coronoid plates designed for fracture fixation, fusions, osteotomies and non-unions of the proximal radius and ulna. Included in the system are titanium bone screws and pegs, cobalt chrome cannulated polyaxial screws, k-wires, and specialized instrumentation.

The system is provided non-sterile and is sterilized in the user facility.

The modifications to the currently marketed Distal Elbow Plating System include the following.

- Two new Proximal Ulna Plate extension options
- New 3.5mm FreeFix™ screw options
- Addition of Protean Radial Head Plate configurations.
- Addition of Modified Proximal Ulna Plate configurations.

Indications for Use
The Skeletal Dynamics Distal Elbow Plating System is indicated for fixation of fractures, fusions, osteotomies and non-unions of the radius and ulna, particularly in osteopenic bone.

Summary of Technological Characteristics
The substantial equivalence of the Distal Elbow Plating System to the predicate and reference devices is demonstrated by similarities in intended use, indications for use, materials, design (fundamental scientific technology), performance, sterility and packaging and does not present any new issues of safety or effectiveness.

Performance Testing
Engineering analysis and mechanical testing demonstrated that the Skeletal Dynamics Distal Elbow Plating System is equivalent to predicate devices currently marketed. Static and Dynamic testing which established equivalency included conformance to ASTM F382-17, Standard Specification and Test Method for Metallic Bone Plates, ASTM F543-17, Standard Specification and Test Methods for Metallic Medical Bone Screws and ASTM F1839-08(2021), Standard Specification for Rigid Polyurethane Foam for Use as a Standard Material for Testing Orthopaedic Devices and Instruments. Therefore, the subject device is as safe and effective as the legally marketed predicate device.

Conclusions
The Skeletal Dynamics Distal Elbow Plating System is substantially equivalent to the predicate Distal Elbow Plating System identified in this premarket notification.