



Medtronic Sofamor Danek, USA Inc. Justin O'Connor Sr. Regulatory Affairs Specialist 1800 Pyramid Place Memphis, Tennessee 38132

Re: K221244

Trade/Device Name: CD Horizon™ Spinal System

Regulation Number: 21 CFR 888.3070

Regulation Name: Thoracolumbosacral Pedicle Screw System

Regulatory Class: Class II

Product Code: NKB, KWP, KWQ, HBE, OLO

Dated: April 29, 2022 Received: May 2, 2022

Dear Mr. O'Connor:

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 <a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfpmn/pmn.cfm</a> 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 <u>Federal Register</u>.

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

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

Sincerely,

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** 

### Indications for Use

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2023 See PRA Statement below.

510(k) Number (if known)		
K221244		
Device Name		
CD Horizon™ Spinal System		

#### Indications for Use (Describe)

The CD Horizon<sup>TM</sup> Spinal System with or without Sextant<sup>TM</sup> instrumentation is intended for posterior, non-cervical fixation as an adjunct to fusion for the following indications: degenerative disc disease (DDD - 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.

Except for hooks, when used as an anterolateral thoracic/lumbar system, the CD Horizon<sup>TM</sup> Spinal System titanium, cobalt chrome, and stainless-steel implants may also be used for the same indications as an adjunct to fusion.

With the exception of DDD, CD Horizon<sup>TM</sup> Legacy<sup>TM</sup> 3.5mm rods and associated components may be used for indications in skeletally mature patients as an adjunct to fusion. The 3.5mm rods may be used for the specific pediatric indications noted.

When used for posterior non-cervical pedicle screw fixation in pediatric patients, CD Horizon<sup>TM</sup> Spinal System titanium, cobalt chrome, and stainless-steel implants are indicated as an adjunct to fusion to treat progressive spinal deformities (i.e. scoliosis, kyphosis, or lordosis) including idiopathic scoliosis, neuromuscular scoliosis, and congenital scoliosis.

Additionally, the CD Horizon<sup>TM</sup> Spinal System is intended to treat pediatric patients diagnosed with the following conditions: spondylolisthesis/spondylolysis, fracture caused by tumor and/or trauma, pseudarthrosis, and/or failed previous fusion. These devices are to be used with autograft and/or allograft. Pediatric pedicle screw fixation is limited to a posterior approach.

The CD Horizon<sup>TM</sup> PEEK rods are intended to provide posterior supplemental fixation when used with an interbody fusion cage for patients diagnosed with DDD. These DDD patients may also have up to Grade 1 spondylolisthesis or retrolisthesis at the involved level. This device is intended for 1-2 level use in the lumbosacral spine (L2 - S1) in skeletally mature patients. Devices are intended for use with an interbody fusion cage at the instrumented level and is not intended for standalone use.

The CD Horizon<sup>TM</sup> Spire<sup>TM</sup> plate is a posterior, single-level, non-pedicle supplemental fixation device intended for use in the non-cervical spine (T1-S1) as an adjunct to fusion in skeletally mature patients. It is intended for plate fixation/ attachment to spinous processes for the purpose of achieving supplemental fixation in the following conditions: DDD, spondylolisthesis, trauma, and/or tumor.

To achieve additional levels of fixation, CD Horizon<sup>TM</sup> Spinal System rods may be connected to the Vertex<sup>TM</sup> Reconstruction System with the Vertex<sup>TM</sup> rod connector. Refer to the Vertex<sup>TM</sup> Reconstruction System package insert for a list of Vertex<sup>TM</sup> indications.

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.		

FORM FDA 3881 (6/20) PSC Publishing Services (301) 443-6740 EF

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### **Indications for Use**

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2023 See PRA Statement below.

Over-The-Counter Use (21 CFR 801 Subpart C)

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510(k) Number (if known)	
K221244	
Device Name	
Navigated Reusable Instruments for use with StealthStation™ and IPC™ Powerease™ Syste	ems
Indications for Use (Describe)	
Medtronic Navigated Reusable Instruments are intended to be used during the prepareties of the surgery to assist the surgeon in precisely locating anatomical states.	
invasive, procedures. Medtronic Navigated Reusable Instruments are specifi	* .
StealthStation <sup>TM</sup> System, which is indicated for any medical condition in which th	
appropriate, and where reference to a rigid anatomical structure, such as a skull, a log	•
relative to a CT or MR-based model, fluoroscopy images, or digitized landmarks of Reusable Instruments are also compatible with the IPCTM PowereaseTM System.	of the anatomy. Medironic Navigated
Systems and the second with the second systems	
Do not implant the instruments.	
Type of Use (Select one or both, as applicable)	

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Prescription Use (Part 21 CFR 801 Subpart D)

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### **Indications for Use**

510(k) Number (if known)

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2023 See PRA Statement below.

K221244
Device Name Medtronic Reusable Instruments for use with the IPC™ Powerease™ System
Indications for Use (Describe) The IPC <sup>TM</sup> System is indicated for the incision/cutting, removal, drilling and sawing of soft and hard tissue and bone, and biomaterials in Neurosurgical (Cranial, Craniofacial), Orthopedic, Arthroscopic, Spinal, Sternotomy, and General surgical procedures.
The IPC <sup>TM</sup> Powerease <sup>TM</sup> System is indicated for drilling, tapping, and driving screws and working end attachments during spinal surgery, including open and minimally invasive procedures. It is also used in placement or cutting of screws, posts, and rods.
Do not implant instruments.
Type of Use (Select one or both, as applicable)
Prescription Use (Part 21 CFR 801 Subpart D)
CONTINUE ON A SEPARATE PAGE IF NEEDED.

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### **Indications for Use**

Form Approved: OMB No. 0910-0120

Expiration Date: 06/30/2023 See PRA Statement below.

510(k) Number (if known)		
K221244		
Device Name Medtronic Navigated Manual Reusable Instruments for use with StealthS	ation™ System	
Indications for Use (Describe) Medtronic Navigated Reusable Instruments are intended to be use implants during spinal surgery to assist the surgeon in precisely loc invasive, procedures. Medtronic Navigated Reusable Instruments casystems. Navigated surgical instruments are specifically designed indicated for any medical condition in which the use of stereotactic rigid anatomical structure, such as a skull, a long bone, or vertebrate fluoroscopy images, or digitized landmarks of the anatomy. An instance as described on the label and the instruments.	ating anatomical structurant be compatible with varied for use with the Steat surgery may be appropriant be identified relative.	res in either open, or minimally arious Medtronic spinal implant althStation <sup>TM</sup> System, which is priate, and where reference to a ve to a CT or MR-based model,
Do not implant the instruments.		
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)

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## 510(k) Summary

# MEDTRONIC CD HORIZON™ Spinal System

### **April 29, 2022**

	N. I. C. C. D. I. MOL. I.
I. Submitter	Medtronic Sofamor Danek, USA Inc.
	1800 Pyramid Place
	Memphis, Tennessee 38132
	Telephone: (901)396-3133
	Justin O'Connor
Contact Person	Sr. Regulatory Affairs Specialist
	Telephone Number: (901)396-3133
	Email: justin.oconnor@medtronic.com
Date Prepared	April 29, 2022
II. Name of Device	CD Horizon™ Spinal System
Common Name	Bone Screw, Pedicle Screw, Powered Instrument, Stereotaxic Instrument
Classification Name	Thoracolumbosacral Pedicle Screw System, Drills, Burrs, Trephines & Accessories (Simple, Powered), Orthopedic Stereotaxic Instrument
Classification	Implants: Class II
Clussification	Instruments/Accessories: Class II
Product Codes	NKB, KWP, KWQ (888.3070, 888.3060, 888.3050), HBE
Troduct Codes	(882.4310), OLO (882.4560)
	Primary Predicate:
III. Predicate Devices	CD Horizon <sup>TM</sup> Spinal System (K210637, S.E. 04/30/2021)
	Additional Predicates:
	CD Horizon <sup>TM</sup> Spinal System (K201407, S.E. 09/10/2020)
	CD Horizon <sup>TM</sup> Spinal System (K042025, S.E. 08/25/2004)
	CD Horizon <sup>TM</sup> Spinal System (K113174, S.E. 11/21/2011)
	CD Horizon <sup>TM</sup> Spinal System (K141604, S.E. 10/21/2014)
	CD Horizon <sup>TM</sup> Spinal System (K091974, S.E. 09/02/2009)
	CD Horizon <sup>TM</sup> Spinal System (K132471, S.E. 10/08/2013)
	CD Horizon <sup>TM</sup> Spinal System (K150178, S.E. 02/11/2015)
	CD Horizon <sup>TM</sup> Spinal System (K140454, S.E. 05/22/2014)
	CD Horizon <sup>TM</sup> Spinal System (K153442, S.E. 02/18/2016)

The predicates have not been subject to a design related recall.

### CD Horizon<sup>TM</sup> Spinal System

The CD Horizon<sup>TM</sup> Spinal System consists of a variety of shapes and sizes of rods, hooks, screws, Crosslink<sup>TM</sup> Plates, staples, and connecting components, as well as implant components from other Medtronic spinal systems which can be rigidly locked into a variety of configurations, with each construct being tailor-made for the individual case. A subset of CD Horizon<sup>TM</sup> Spinal System components may be used for posterior pedicle screw fixation in pediatric cases. These constructs may be comprised of a variety of shapes and sizes of rods (ranging in diameter from 3.5 to 6.35mm), hooks, screws, Crosslink<sup>TM</sup> plates and connecting components. Similar to the CD Horizon<sup>TM</sup> implants used in adult cases, these components can be rigidly locked into a variety of configurations, with each construct being tailor-made for the individual case. Certain components within the CD Horizon<sup>TM</sup> Spinal System are specifically excluded for use in pediatric patients. These include PEEK rods, Shape Memory Alloy Staples, Spire<sup>TM</sup> plates, and Dynalok<sup>TM</sup> bolts. Screws used in pediatric cases are only cleared for use via a posterior approach. Components used in pediatric cases are fabricated from medical grade stainless steel, medical grade titanium, titanium alloy, and medical grade cobalt-chromiummolybdenum alloy. Certain implant components from other Medtronic spinal systems can be used with the CD Horizon<sup>TM</sup> Spinal System in non- pediatric cases. These components include TSRH<sup>TM</sup> rods, hooks, screws, plates, Crosslink<sup>TM</sup> plates, connectors, staples, and washers, GDLH<sup>TM</sup> rods, hooks, connectors, and Crosslink<sup>TM</sup> bar and connectors; Liberty<sup>TM</sup> rods and screws; Dynalok<sup>TM</sup> Plus and Dynalok Classic<sup>TM</sup> bolts along with rod/bolt connectors; and Medtronic multi-axial rods and screws. Note: certain components are specifically designed to connect to specific rod diameters, while other components can connect to multiple rod diameters. Care should be taken so the correct components are used in the spinal construct. CD Horizon<sup>TM</sup> hooks are intended for posterior use only. CD Horizon<sup>TM</sup> staples and CD Horizon<sup>TM</sup> Eclipse<sup>TM</sup> rods and associated screws are intended for anterior use only. However, for patients of smaller stature and pediatric patients, CD Horizon<sup>TM</sup> 4.5mm rods and associated components may be used posteriorly. CD Horizon<sup>TM</sup> Spinal System implant components are

IV. Description

fabricated from medical grade stainless steel, medical grade titanium, titanium alloy, medical grade cobalt-chromiummolybdenum alloy, or medical grade PEEK Optima-LT1. Certain CD Horizon<sup>TM</sup> Spinal System components may be coated with hydroxyapatite. No warranties, expressed or implied, are made. Implied warranties of merchantability and fitness for a particular purpose or use are specifically excluded. Never use stainless steel and titanium implant components in the same construct. Medical grade titanium, titanium alloy, and/or medical grade cobaltchromium-molybdenum alloy may be used together. Never use titanium, titanium alloy, and/or medical grade cobalt-chromiummolybdenum alloy with stainless steel in the same construct. The CD Horizon<sup>TM</sup> Spinal System also includes anterior staples made of Shape Memory Alloy (Nitinol – NiTi). Shape Memory Alloy is compatible with titanium, titanium alloy, and cobalt-chromiummolybdenum alloy. Do not use with stainless steel. These staples are not to be used in pediatric patients. PEEK Optima-LT1 implants may be used with titanium or cobalt-chromium-molybdenum alloy implants. CD Horizon<sup>TM</sup> PEEK rods are not to be used in pediatric patients. PEEK rods are only to be used with the associated pedicle screws as well as interbody fusion devices in the anterior spinal column. To achieve best results, do not use CD Horizon™ Spinal System implant components with components from any other system or manufacturer unless specifically allowed to do so in this or another Medtronic document. As with all orthopedic and neurosurgical implants, none of the CD Horizon™ Spinal System components should ever be reused under any circumstances.

# Medtronic Reusable Instruments for use with IPC<sup>TM</sup> Powerease<sup>TM</sup> System

The Medtronic Reusable Instruments compatible with Medtronic's IPC<sup>TM</sup> Powerease<sup>TM</sup> System are spine preparation instruments, manufactured from materials commonly used in orthopedic procedures which meet available national or international standards specifications. Instruments may be connected to the Powerease<sup>TM</sup> Driver or used manually. These instruments are also compatible with various Medtronic spinal implant systems.

# Medtronic Navigated Reusable Instruments for use with StealthStation<sup>TM</sup> and IPC<sup>TM</sup> Powerease<sup>TM</sup> Systems

Medtronic Navigated Reusable Instruments are spine preparation instruments made of high-grade stainless steel. These instruments are specifically designed for use in procedures where the use of stereotactic surgery may be appropriate. Placing Medtronic single-use sterile spheres on each of the NavLock<sup>TM</sup> Tracker passive stems allows a Medtronic computer-assisted surgery system such as the StealthStation<sup>TM</sup> Image Guidance System to track the instruments in the surgical field. Medtronic Navigated Reusable Instruments are compatible with various Medtronic spinal implant systems. These instruments are also compatible with Medtronic's IPC<sup>TM</sup> Powerease<sup>TM</sup> System when connected to the Powerease<sup>TM</sup> Driver.

# Medtronic Navigated Manual Reusable Instruments for use with the StealthStation<sup>TM</sup> System

Medtronic Navigated Reusable Instruments are spine preparation instruments made of high-grade stainless steel. These instruments are specifically designed for use in procedures where the use of stereotactic surgery may be appropriate. Placing Medtronic single-use sterile spheres on each of the NavLock<sup>TM</sup> Tracker passive stems allows a Medtronic computer-assisted surgery system such as the StealthStation<sup>TM</sup> Image Guidance System to track the instruments in the surgical field. Medtronic Navigated Reusable Instruments are compatible with various Medtronic spinal implant systems. If the device passes the visual and functional inspection as described in the IFU, the instrument can be expected to perform as intended for the perioperative period.

### CD Horizon<sup>TM</sup> Spinal System

V. Indications for Use

The CD Horizon<sup>™</sup> Spinal System with or without Sextant<sup>™</sup> instrumentation is intended for posterior, non-cervical fixation as an adjunct to fusion for the following indications: degenerative disc disease (DDD - 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. Except for hooks, when used as an anterolateral thoracic/lumbar system, the CD Horizon<sup>™</sup> Spinal System titanium, cobalt chrome, and stainless-steel implants may also be used for the same indications

as an adjunct to fusion. With the exception of DDD, CD Horizon<sup>TM</sup> Legacy<sup>TM</sup> 3.5mm rods and associated components may be used for indications in skeletally mature patients as an adjunct to fusion. The 3.5mm rods may be used for the specific pediatric indications noted. When used for posterior non-cervical pedicle screw fixation in pediatric patients, CD Horizon<sup>TM</sup> Spinal System titanium, cobalt chrome, and stainless-steel implants are indicated as an adjunct to fusion to treat progressive spinal deformities (i.e. scoliosis, kyphosis, or lordosis) including idiopathic scoliosis, neuromuscular scoliosis, and congenital scoliosis. Additionally, the CD Horizon<sup>TM</sup> Spinal System is intended to treat pediatric patients diagnosed with the following conditions: spondylolisthesis/spondylolysis, fracture caused by tumor and/or trauma, pseudarthrosis, and/or failed previous fusion. These devices are to be used with autograft and/or allograft. Pediatric pedicle screw fixation is limited to a posterior approach. The CD Horizon<sup>TM</sup> PEEK rods are intended to provide posterior supplemental fixation when used with an interbody fusion cage for patients diagnosed with DDD. These DDD patients may also have up to Grade 1 spondylolisthesis or retrolisthesis at the involved level. This device is intended for 1-2 level use in the lumbosacral spine (L2 - S1) in skeletally mature patients. Devices are intended for use with an interbody fusion cage at the instrumented level and is not intended for stand-alone use. The CD Horizon<sup>TM</sup> Spire<sup>TM</sup> plate is a posterior, single-level, non-pedicle supplemental fixation device intended for use in the non-cervical spine (T1-S1) as an adjunct to fusion in skeletally mature patients. It is intended for plate fixation/attachment to spinous processes for the purpose of achieving supplemental fixation in the following conditions: DDD, spondylolisthesis, trauma, and/or tumor. To achieve additional levels of fixation, CD Horizon<sup>TM</sup> Spinal System rods may be connected to the Vertex<sup>TM</sup> Reconstruction System with the Vertex<sup>TM</sup> rod connector. Refer to the Vertex<sup>TM</sup> Reconstruction System package insert for a list of Vertex<sup>TM</sup> indications.

# Medtronic Reusable Instruments for use with IPC<sup>TM</sup> Powerease<sup>TM</sup> System

The IPC<sup>TM</sup> System is indicated for the incision/cutting, removal, drilling and sawing of soft and hard tissue and bone, and biomaterials in Neurosurgical (Cranial, Craniofacial), Orthopedic, Arthroscopic, Spinal, Sternotomy, and General surgical procedures.

The IPC<sup>TM</sup> Powerease<sup>TM</sup> System is indicated for drilling, tapping, and driving screws and working end attachments during spinal surgery, including open and minimally invasive procedures. It is also used in placement or cutting of screws, posts, and rods. Do not implant instruments.

## Medtronic Navigated Reusable Instruments for use with StealthStation<sup>TM</sup> and IPC<sup>TM</sup> Powerease<sup>TM</sup> Systems

Medtronic Navigated Reusable Instruments are intended to be used during the preparation and placement of Medtronic screws during spinal surgery to assist the surgeon in precisely locating anatomical structures in either open, or minimally invasive, procedures. Medtronic Navigated Reusable Instruments are specifically designed for use with the StealthStation<sup>TM</sup> System, which is indicated for any medical condition in which the use of stereotactic surgery may be appropriate, and where reference to a rigid anatomical structure, such as a skull, a long bone, or vertebra can be identified relative to a CT or MR-based model, fluoroscopy images, or digitized landmarks of the anatomy. Medtronic Navigated Reusable Instruments are also compatible with the IPC<sup>TM</sup> Powerease<sup>TM</sup> System. Do not implant the instruments.

# Medtronic Navigated Manual Reusable Instruments for use with the StealthStation<sup>TM</sup> System

Medtronic Navigated Surgical Instruments are intended to be used during preparation and placement of Medtronic implants during spinal surgery to assist the surgeon in precisely locating anatomical structures in either open or minimally invasive procedures. Medtronic Navigated Reusable Instruments can be compatible with various Medtronic spinal implant systems. Navigated surgical instruments are specifically designed for use with the StealthStation<sup>TM</sup> System, which is indicated for any medical condition in which the use of stereotactic surgery may be appropriate, and where reference to a rigid anatomical structure, such as a skull, a long bone, or vertebra, can be identified relative to a CT or MR-based model, fluoroscopy images, or digitized landmarks of the anatomy. An instrument may incorporate a measuring function, which has uses as described on the label and the instruments. Do not implant the instruments.

	The subject devices have the same intended use, indications for use, materials, similar overall design, fundamental technology,
	sterilization, and surgical technique as the following CD Horizon <sup>TM</sup> Spinal System predicates:
VI. Comparison of Technological Characteristics with the Predicate Devices	K210637 (S.E. 04/30/2021), K201407 (S.E. 09/10/2020), K042025 (S.E. 08/25/2004), K113174 (S.E. 11/21/2011), K141604 (S.E. 10/21/2014), K091974 (S.E. 09/02/2009), K132471 (S.E. 10/08/2013), K150178 (S.E. 02/11/2015), K140454 (S.E. 05/22/2014), and K153442 (S.E. 02/18/2016).  The subject and predicate implants and instruments have the
	same function and fundamental scientific technology.
VII. Performance Data	In accordance with the Guidance for Industry and FDA Staff – Spinal System 510(k)'s, Medtronic has evaluated the subject devices to demonstrate substantial equivalence to the predicate devices.  The subject devices have been tested or rationalized based on if Medtronic believes that testing is not warranted for the subject devices as they do not present a new worst case when compared to the predicates.  The mechanical tests that were performed per ASTM F1717 include Static Compression, Static Torsion, Compression Fatigue, and per ASTM F1798 include Axial Grip, Axial Torsion, Flexion Extension Static, Flexion Extension Fatigue. In addition to the ASTM testing, Medtronic also performed Decapitation testing. For the tested subject devices, the pre-determined acceptance criteria have been met for all tests.  For subject devices that are rationalized, all existing predicate data previously provided in the predicate 510(k)s is still applicable. Therefore, Medtronic believes design verification testing demonstrated that the subject devices are substantially equivalent
	to the predicate devices. Design validation testing has also been performed and demonstrated that the subject devices performed as intended.
VIII. Conclusion	Based on the supporting evidence provided in this premarket notification, Medtronic believes the subject devices are substantially equivalent to the predicate devices.