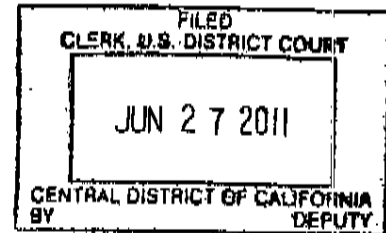


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VASCULAR GALWAY LTD.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MEDTRONIC COREVALVE LLC,  
MEDTRONIC CV LUXEMBOURG  
S A R L, AND MEDTRONIC  
VASCULAR GALWAY LTD.,

Case **NCV11-00961-JVS(MLG)**  
**COMPLAINT FOR PATENT  
INFRINGEMENT**

Plaintiffs,

v.

EDWARDS LIFESCIENCES  
CORPORATION, EDWARDS  
LIFESCIENCES LLC, AND  
EDWARDS LIFESCIENCES (U.S.)  
INC.,

Defendants.

1 Plaintiffs Medtronic CoreValve LLC, Medtronic CV Luxembourg S.a.r.l.,  
2 and Medtronic Vascular Galway, Ltd. (collectively "Medtronic") for their  
3 Complaint against Defendants Edwards Lifesciences Corporation, Edwards  
4 Lifesciences LLC, and Edwards Lifesciences (U.S.) Inc., hereby states and alleges  
5 as follows:

6 I.

7 **INTRODUCTION**

8 1. This is an action for willful infringement by Defendants of a United  
9 States patent owned by Medtronic CoreValve LLC.

10 2. Plaintiff Medtronic CoreValve LLC is a limited liability company  
11 organized and existing under the laws of Delaware, with its principal place of  
12 business in Irvine, California.

13 3. Plaintiff Medtronic CV Luxembourg S.a.r.l. is a limited liability  
14 company organized and existing under the laws of Luxembourg, with its principal  
15 place of business in Luxembourg.

16 4. Plaintiff Medtronic Vascular Galway Ltd. is a company organized and  
17 existing under the laws of Ireland, with its principal place of business in Galway,  
18 Ireland.

19 5. Upon information and belief, Defendant Lifesciences Corporation is a  
20 corporation organized and existing under the laws of Delaware with its principal  
21 place of business in Irvine, California.

22 6. Upon information and belief, Defendant Edward Lifesciences LLC is a  
23 wholly-owned subsidiary of Edwards Lifesciences Corporation that is organized  
24 under the laws of Delaware with its principal place of business in Irvine, California.

25 7. Upon information and belief, Defendant Edwards Lifesciences (U.S.)  
26 Inc. is a wholly-owned subsidiary of Edwards Lifesciences Corporation that is  
27 organized under the laws of Delaware with its principal place of business in Irvine,  
28 California. Edwards Lifesciences Corporation, Edwards Lifesciences LLC and

1 Edwards Lifesciences (U.S.) Inc. are collectively hereinafter referred to as  
2 “Edwards.”

## 3 II.

### 4 JURISDICTION AND VENUE

5 8. This Court has jurisdiction over the subject matter of this action  
6 pursuant to 28 U.S.C. § 1331 and § 1338(a) in that this action arises under the  
7 patent laws of the United States.

8 9. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b),  
9 1391(c) and 1400(b).

10 10. This Court has personal jurisdiction over the Defendants because,  
11 upon information and belief, Defendants conduct business within this judicial  
12 district, and have their principal places of business within this judicial district.  
13 Upon information and belief, Defendants have committed and continue to commit  
14 acts of patent infringement within this judicial district.

## 15 III.

### 16 FACTUAL BACKGROUND

17 11. Plaintiff Medtronic CoreValve LLC is the lawful owner of United  
18 States Patent No. 7,892,281 (“the ‘281 Patent”), which was duly and legally issued  
19 by the United States Patent and Trademark Office on February 22, 2011. The ‘281  
20 Patent is entitled “Prosthetic Valve for Transluminal Delivery.” A copy of the ‘281  
21 Patent is attached hereto as Exhibit 1.

22 12. Plaintiff Medtronic CV Luxembourg S.a.r.l. is the exclusive licensee  
23 of the ‘281 Patent.

24 13. Plaintiff Medtronic Vascular Galway Ltd. holds world wide  
25 manufacturing and distribution rights to the ‘281 Patent.

26 14. Collectively, the Medtronic Plaintiffs own all rights, title and interests  
27 in the ‘281 Patent.

**(Claim for Patent Infringement of U.S. Patent No. 7,892,281)**

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.  
ATTORNEYS AT LAW  
LOS ANGELES

V.

**PRAYER FOR RELIEF**

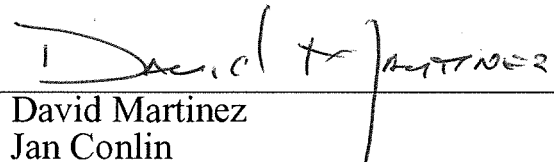
WHEREFORE, Plaintiff Medtronic prays for judgment against Defendants as follows:

1. That Defendants have infringed, either literally or under the Doctrine of Equivalents, one or more claims of the '281 Patent;
2. That Defendants' infringement has been willful and trebling the award of damages;
3. That Defendants, and their respective agents, servants, officers, directors, employees and all persons acting in concert with them, directly or indirectly, be permanently enjoined from infringing the '281 Patent;
4. That Defendants account for and pay to Plaintiff damages adequate to compensate them for Defendants' infringement, in an amount to be proven at trial, together with interest and costs as fixed by the Court;
5. Declaring that this case is exceptional and awarding Plaintiff its costs and attorneys' fees in accordance with 35 U.S.C. § 285; and
6. That Plaintiff be awarded such other and further relief as the Court may deem just and equitable.

Dated: June 24, 2011

**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**

By:

  
David Martinez  
Jan Conlin  
Stacie Oberts  
Lauren Wood

**Attorneys for Plaintiffs  
MEDTRONIC COREVALVE LLC,  
MEDTRONIC CV LUXEMBOURG S.A.R.L.,  
and MEDTRONIC VASCULAR GALWAY  
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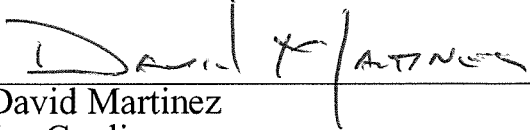
**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff  
demands a jury trial as to all matters so triable.

Dated: June 24, 2011

**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**

By:

  
David Martinez

Jan Conlin

Stacie Oberts

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**Attorney for Plaintiffs**

**MEDTRONIC COREVALVE LLC,  
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