

Millennium Medical Technologies Inc./DBA Cellmyx Attention: Jacqueline Hauge Regulatory Consultant 37743 175<sup>th</sup> Ave Avon, MN 56310 Email address: Jacqueline.Hauge@gmail.com February 9, 2023

Re: BK220726 (Formally K210528) Trade/Device Name: IntelliFat Disposable Adipose Tissue Harvesting and Transfer Kit, IntelliFat Body On Demand (BOD) Kit Regulation Number: 21 CFR 878.5040 Regulation Name: Suction lipoplasty system Regulatory Class: Class II Product Code: QKL, QUB

Dear Ms.Hauge:

The Food and Drug Administration (FDA) is sending this letter to notify you of an administrative change related to your previous substantial equivalence (SE) determination letter dated March 16, 2022. Specifically, FDA is updating this SE Letter because FDA has assigned your submission a new submission tracking number and created a new product code to better categorize your device technology.

Please update the registration and listing of the device within the FURLS Device Registration and Listing Module according to <u>http://www.fda.gov/</u> <u>MedicalDevices/DeviceRegulationandGuidance/HowtoMarketYourDevice/RegistrationandListing/ucm053185.htm</u>.

For more information, please refer to the Federal Register Notice Consolidation of Devices That Process Autologous Human Cells, Tissues, and Cellular and Tissue-Based Products at the Point of Care To Produce a Therapeutic Article (86 FR 50887, available at <a href="https://www.federalregister.gov/documents/2021/09/13/2021-18912/consolidation-of-devices-that-process-autologous-human-cells-tissues-and-cellular-and-tissue-based">https://www.federalregister.gov/documents/2021/09/13/2021-18912/consolidation-of-devices-that-process-autologous-human-cells-tissues-and-cellular-and-tissue-based</a>).

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Please note that the 510(k) submission was not re-reviewed. For questions regarding this letter please contact the Regulatory Project Manager, Candace Jarvis at (240) 402-8315 or by email at <u>Candace.Jarvis@fda.hhs.gov</u>.

Sincerely,

Wilson W. Bryan, MD Director Office of Tissues and Advanced Therapies Center for Biologics Evaluation and Research



March 16, 2022

Millennium Medical Technologies Inc (DBA Cellmyx) % Jacqueline Hauge Regulatory Consultant Cellmyx 37743 175th Avenue Avon, Minnesota 56310

Re: K210528

Trade/Device Name: IntelliFat Disposable Adipose Tissue Harvesting and Transfer Kit IntelliFat Body On Demand (BOD) Kit Regulation Number: 21 CFR 878.5040 Regulation Name: Suction Lipoplasty System Regulatory Class: Class II Product Code: MUU Dated: January 28, 2022 Received: January 31, 2022

Dear Jacqueline Hauge:

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 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 <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 <u>https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems</u>.

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

Sincerely,

for Deborah Fellhauer, RN, BSN Assistant Director DHT4B: Division of Infection Control and Plastic Surgery Devices OHT4: Office of Surgical and Infection Control Devices Office of Product Evaluation and Quality Center for Devices and Radiological Health

Enclosure

# **Indications for Use**

510(k) Number *(if known)* K210528

Device Name intelliFat<sup>™</sup> Disposable Adipose Tissue Harvesting and Transfer Kit intelliFat<sup>™</sup> BOD Kit

#### Indications for Use (Describe)

The intelliFat Disposable Adipose Tissue Harvesting and Transfer or BOD Kit is a sterile medical device intended for the closed-loop processing of lipoaspirate tissue in medical procedures involving the harvesting, concentrating, and transferring of autologous adipose tissue harvested with a legally marketed lipoplasty system. The device is intended for use in the following surgical specialties when the transfer of harvested adipose tissue is desired: orthopedic surgery, arthroscopic surgery, neurosurgery, gastrointestinal and affiliated organ surgery, urological surgery, general surgery, gynecological surgery, thoracic surgery, laparoscopic surgery, and plastic and reconstructive surgery when aesthetic body contouring is desired. Only legally marketed accessory items, such as syringes, should be used with the system. If harvested fat is to be transferred, the harvested fat is only to be used without any additional manipulation.

Type of Use (Select one or both, as applicable)
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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.

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# 510(k) Summary

Date Prepared:

Submitter

March 15, 2022

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Name and Address:	6352 Co Suite A	rte Del Abeto I, CA 92011	
Primary Contact:	Jacqueline A. Hauge Regulatory Consultant Minneapolis, MN Phone: 763-269-2069 Email: jacqueline.hauge@gmail.com		
Secondary Contact:	Michelle Nguyen Quality Assurance and Regulatory Manager, Cellmyx 6352 Corte de Abeto, Suite A Carlsbad, CA 92011 Phone: (949) 215-8560 Email: <u>michelle@cellmyx.com</u>		
II. Device Information FDA Product Code:		MUU	
FDA Regulation Number:		21 CFR 878.5040	
FDA Classification Name:		System, Suction, Lipoplasty	
Classification Panel:		General and Plastic Surgery	

# Common Name: Lipoplasty System

FDA Classification: Class II

Device Name: intelliFat<sup>™</sup> Disposable Adipose Tissue Harvesting and Transfer Kit

intelliFat<sup>™</sup> Body On-Demand (BOD) Kit

Predicate	510(k) Number	Trade Name	Submitter
Primary	K161636	Lipogems System	Lipogems International SpA
Reference	K162932	Ranfac Fat Aspiration Cannula	Ranfac Corp.
Reference	K113255	Puregraft 850/PURE System	Cytori Therapeutics, Inc.

#### III. Predicate Information

### 510(k) Summary

## IV. Device Description

The intelliFat Disposable Adipose Tissue Harvesting and Transfer and intelliFat BOD Kits are sterile single-use, disposable suction lipoplasty systems that are intended for closed-loop processing of lipoaspirate tissue in various medical procedures involving harvesting and transferring autologous adipose tissue. These kits contain stand-alone components that are assembled by the physician user. Primary components include: cannulae, filters, resizer, luer adapters, and syringe caps. The intelliFat Kits accommodate minimal handling of adipose tissue. These devices may be used in combination with FDA-cleared device such as syringes.

# V. Indication for Use

The intelliFat Disposable Adipose Tissue Harvesting and Transfer or BOD Kit is a sterile medical device intended for the closed-loop processing of lipoaspirate tissue in medical procedures involving the harvesting, concentrating, and transferring of autologous adipose tissue harvested with a legally marketed lipoplasty system. The device is intended for use in the following surgical specialties when the transfer of harvested adipose tissue is desired: orthopedic surgery, arthroscopic surgery, neurosurgery, gastrointestinal and affiliated organ surgery, urological surgery, general surgery, gynecological surgery, thoracic surgery, laparoscopic surgery, and plastic and reconstructive surgery when aesthetic body contouring is desired. Only legally marketed accessory items, such as syringes, should be used with the system. If harvested fat is to be transferred, the harvested fat is only to be used without any additional manipulation.



### VI. Comparison of Technological Characteristics

Technological	Predicate Device	Reference Devices		Subject Device
Characteristics	Lipogems System	Ranfac Fat Aspiration Cannula	Puregraft 850/PURE System	IntelliFat™ Kits
<b>Regulatory Information</b>	1			
510(k) Number	K161636	K162932	K113255	This submission
Device Name	Lipogems System	Ranfac Fat Aspiration Cannula	Puregraft 850/PURE System	intelliFat Disposable Adipose Tissue Harvesting and Transfer Kit, intelliFat BOD Kit
Manufacturer	Lipogems International SpA	Ranfac Corp.	Cytori Therapeutics, Inc.	Cellmyx
Common Name	Lipoplasty System	Ranfac Fat Aspiration Cannula	Puregraft 850/PURE System	Lipoplasty System
Regulation Number	21 CFR 878.5040	21 CFR 878.5040	21 CFR 878.5040	21 CFR 878.5040
Device Class	Class II	Class II	Class II	Class II
Product Code	MUU	MUU	MUU	MUU
Classification Panel	General and Plastic Surgery	General and Plastic Surgery	General and Plastic Surgery	General and Plastic Surgery
Intended Use		•	•	•
Indications for Use	The Lipogems System is a	The Ranfac Fat Aspiration	The Puregraft 850/PURE	The intelliFat Disposable
Statement	sterile medical device	Cannula are intended for use in	System is indicated for use	Adipose Tissue Harvesting
	intended for the closed-	aesthetic body contouring. If	in the harvesting, filtering	and Transfer or BOD Kit is a
	loop processing of	harvested fat is to be re-	and transferring of	sterile medical device
	lipoaspirate tissue in	implanted, the harvested fat is	autologous fat tissue for	intended for the closed-loop
	medical procedures	only to be used without any	reinjecting back into the	processing of lipoaspirate
	involving the harvesting,	additional manipulation.	same patient for aesthetic	tissue in medical procedures
	concentrating, and		body contouring.	involving the harvesting,
	transferring of autologous			concentrating, and
	adipose tissue harvested			transferring of autologous
	with a legally marketed			adipose tissue harvested with
	lipoplasty system. The			a legally marketed lipoplasty
	device is intended for use in			system. The device is
	the following surgical			intended for use in the



Technological	Predicate Device	Reference Devices		Subject Device
Characteristics	Lipogems System	Ranfac Fat Aspiration Cannula	Puregraft 850/PURE System	IntelliFat™ Kits
	specialties when the transfer of harvested adipose tissue is desired: orthopedic surgery, arthroscopic surgery, gastrointestinal and affiliated organ surgery, urological surgery, general surgery, gynecological surgery, thoracic surgery, laparoscopic surgery, and plastic and reconstructive surgery when aesthetic body contouring is desired. Only legally marketed accessory items, such as syringes, should be used with the system. If harvested fat is to be transferred, the harvested fat is only to be used without any additional manipulation.			following surgical specialties when the transfer of harvested adipose tissue is desired: orthopedic surgery, arthroscopic surgery, neurosurgery, gastrointestinal and affiliated organ surgery, urological surgery, general surgery, gynecological surgery, thoracic surgery, laparoscopic surgery, and plastic and reconstructive surgery when aesthetic body contouring is desired. Only legally marketed accessory items, such as syringes, should be used with the system. If harvested fat is to be transferred, the harvested fat is only to be used without any additional manipulation.
Technological Characte		1		
System	Closed loop	-	Closed loop	Closed loop
Construction	Preassembled	-	-	Assembly by user
Use and Sterility	Single-use, sterile	Single-use, sterile	Single-use, sterile	Single-use, sterile
Sterilization Method	Ethylene Oxide	Ethylene Oxide	Gamma irradiation	Gamma Radiation
Biocompatibility	Biocompatible	Biocompatible	Biocompatible	Biocompatible



Technological	Predicate Device Lipogems System	Reference Devices		Subject Device
Characteristics		Ranfac Fat Aspiration Cannula	Puregraft 850/PURE System	IntelliFat™ Kits
Mechanical Operation	Manual shaking of stainless- steel spheres through filtered chamber	-	Manually operated system that receive adipose tissue, filter the adipose tissue, and temporarily hold the adipose tissue until it is removed or placed into a syringe that delivers / re- injects the adipose tissue back into the same patient during the same surgical procedure	Manual transfer back and forth through filtered syringe
Source of Energy	None required	None required	None required	None required
Tissue Washing Media	Physiological saline	-	-	Physiological saline
Harvesting Cannula Ga. Size	13Ga.	11Ga., 13Ga. & 14Ga.	-	12Ga.
Harvesting Cannula Length	19cm	10cm, 12cm, 15cm, 20cm & 25cm	-	15cm
Filter / Mesh sizes	LGD 240 and LGD60: 2000 micron mesh at inlet and 1000 micron mesh at outlet - collected adipose tissue passes though both meshes	-	The Puregrafto 850 Bag contains two (2) filters that are continuous within the bag. The first filter is an 800 micron filter mesh and the second filter is a 74 micron filter mesh.	Filters: 100 micron and 300 micron Resizer: 500 micron

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## VII. Summary of Non-Clinical Testing and Risk Analysis

The performance of the device is entirely controlled by the user and is not predetermined by the device itself. The instructions for use advise the user on the proper user of the device.

Nonclinical testing included:

- Biocompatibility testing:
  - Cytotoxicity
  - $\circ \quad \text{Sensitization} \quad$
  - Intracutaneous Reactivity
  - Acute Systemic Toxicity
  - o Pyrogen
- Sterilization validation
- Packaging validation
- Nucleated cell viability

# VIII. Clinical Testing

Clinical testing was not required to support a substantial equivalence determination for the intelliFat Kits.

## IX. Conclusion

Based on the comparison of intended use and technological characteristics, Cellmyx has demonstrated that the intelliFat Kits are substantially equivalent to the predicate device.