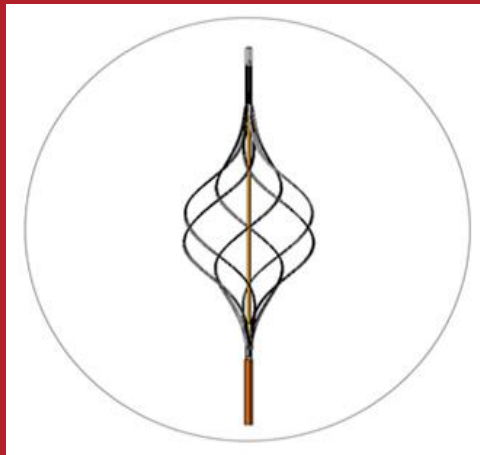


THROMBOLEX™

INNOVATIVE ENDOVASCULAR CATHETERS

Thrombolex provides an innovative line of Endovascular Catheters, which feature a unique combination of mechanical, expandable infusion catheters to infuse physician specified fluids for the treatment of Arterial & Venous Thromboembolic (AVTE) conditions



Value Analysis Packet

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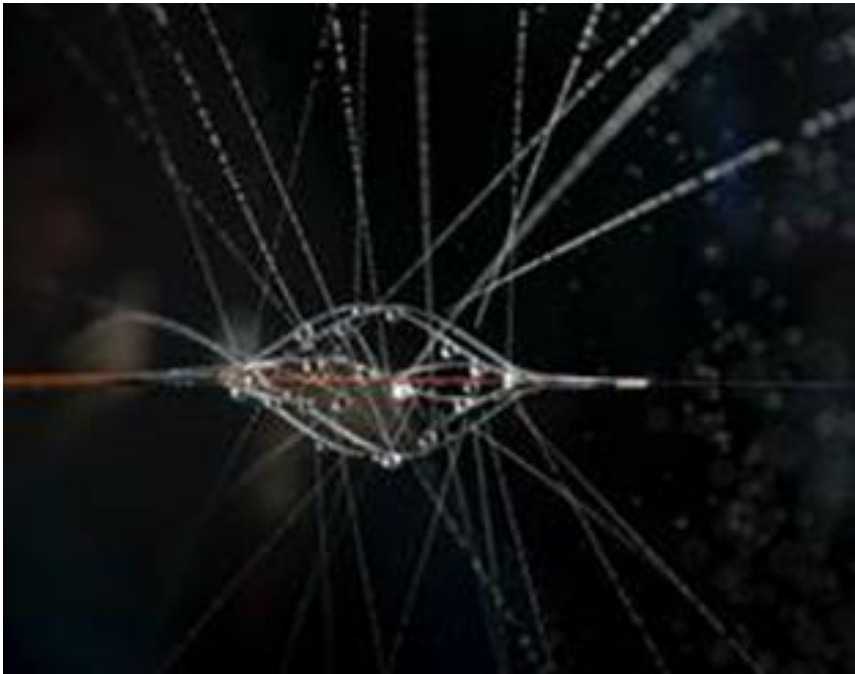
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BASHIR™ *endovascular catheter*



THE PROBLEM

Venous thromboembolic (VTE) disease is an under-recognized and under-treated condition. It is the third leading cause of cardiovascular-related death and accounts for 15% of all hospital related deaths.

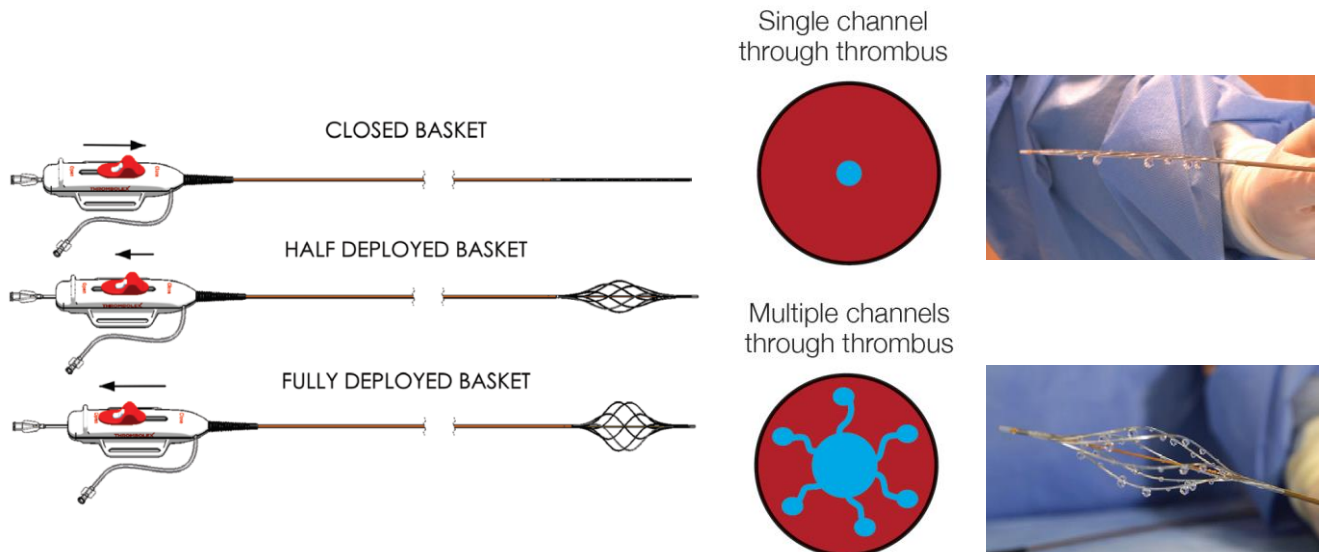
OUR SOLUTION

BASHIR™ Endovascular Catheter: An innovative CDT[‡] technology featuring a unique mechanical function that immediately restores blood flow, while enabling accelerated thrombolysis via its *expandable* infusion basket.

DESIGNED TO ENHANCE OUTCOMES

BASHIR™ Endovascular Catheter is the first interventional catheter to rapidly create multiple channels so the patient's own endogenous lytics can flow into the culprit thrombus. It is the only CDT device that allows clinicians to monitor cardiovascular function and patient vital signs, through the device and during infusion treatment. This helps enable diagnostic and therapeutic decisions to be made earlier, helping to guide clinician treatment decisions for critically ill patients.

[‡] CDT = catheter directed thrombolysis



MODE OF ACTION

Total clot burden reduction

Mechanical expansion of the 6 mini-infusion catheters of the basket in the BASHIR™ family of Endovascular Catheters creates a large central channel which is designed to allow the patient's own blood to flow through the culprit clot immediately. This creates a greater surface area within the clot where the endogenous and exogenous lytics may attach to plasminogen receptors to accelerate lysis, fragmenting the clot and reducing the total clot burden.

SAFETY

The potential to reduce bleeding complications

The patent center lumen of the BASHIR™ Endovascular Catheters uniquely allows the medical team to measure pulmonary artery pressure and mixed venous oxygen saturation during infusion†. This should reduce bleeding complications by helping clinicians assess cardiovascular function data to guide *real time* treatment decisions. This also enables early intervention for critically ill patients, by clinicians, supported by diagnostic and therapeutic decisions.

EASE OF USE & COST-EFFECTIVE CARE

Minimal change to workflow and simple to use

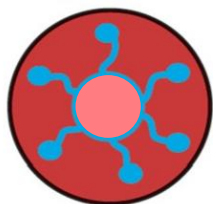
By employing standard interventional techniques used in most cath labs, the BASHIR™ family of Endovascular Catheters are easy to use and do not require the purchase of expensive additional capital equipment. This enables a more cost-effective and efficient approach across the patient care continuum.

† The Bashir™ N-X Endovascular Catheter is the only catheter presently offered by Thrombolex Inc. with an indication for use in the pulmonary artery vasculature. For more information, please refer to Regulatory Information.

SYNERGISTIC ENDOGENOUS AND EXOGENOUS THROMBOLYSIS (A unique mechanism that enhances the body's own ability to dissolve blood clots, while improving the therapeutic effect of thrombolytic drugs)

Rapid flow restoration

Established by creating a large central channel through the thrombus by expansion of the catheter basket.



INCREASE

Luminal filling and blood velocity

PROMOTE

Endogenous thrombolysis^{i,ii}

This creates a greater surface area within the culprit clot for the endogenous and exogenous lytics to attach to more plasminogen receptors, causing fragmentation and promoting accelerated lysis of the clot burden.

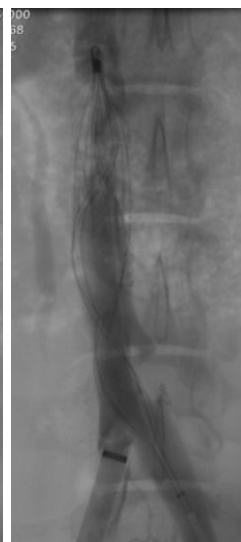
Experimental model of inferior vena cava (IVC) thrombosis



Normal flow in IVC prior to thrombosis



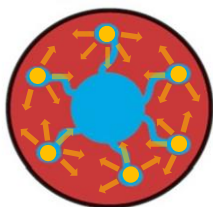
Flow cessation in thrombosed IVC



Flow restored after deployment of basket

Multichannel infusion

Enabled by expansion of the 6 mini sidehole catheters into the thrombus.



INCREASE

Surface area and lytic penetration

PROMOTE

Exogenous thrombolysis

Thrombolytic delivery via the expanded mini catheters



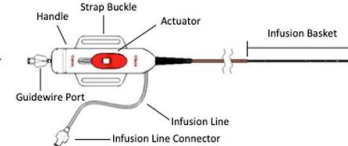
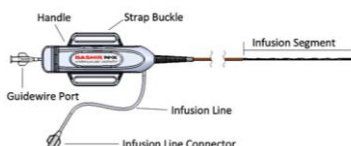
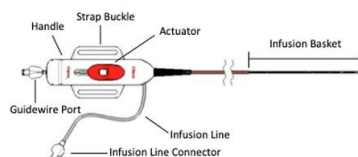
PRODUCT SPECIFICATIONS

THROMBOLEX™
INNOVATIVE ENDOVASCULAR CATHETERS

BASHIR™ *endovascular catheter*

BASHIR™ N-X *endovascular catheter*

BASHIR™ S-B *endovascular catheter*



KEY DIMENSIONS

French Size	7 F (2.3 mm)		
Effective Length	92.5 cm (36.44 in)		
Infusion Basket Length	12.50 cm (4.94 in)	N/A	10.00 cm (3.94 in)
Infusion Basket Diameter	45 mm max.	N/A	42 mm max.

CHARACTERISTICS

Basket Expansion	Controlled by actuator	N/A	Controlled by actuator
Thrombolytic Infusion	6 mini-infusion catheters with 48 precision laser-drilled holes		
Guidewire Compatibility	0.018"		
Sterilization	Ethylene oxide gas		
Use	Single use		
Shelf Life	2 years		

ORDERING INFORMATION

Product Order Number	7201	7200	7101
Minimum Order Quantity*	Each	Each	Each

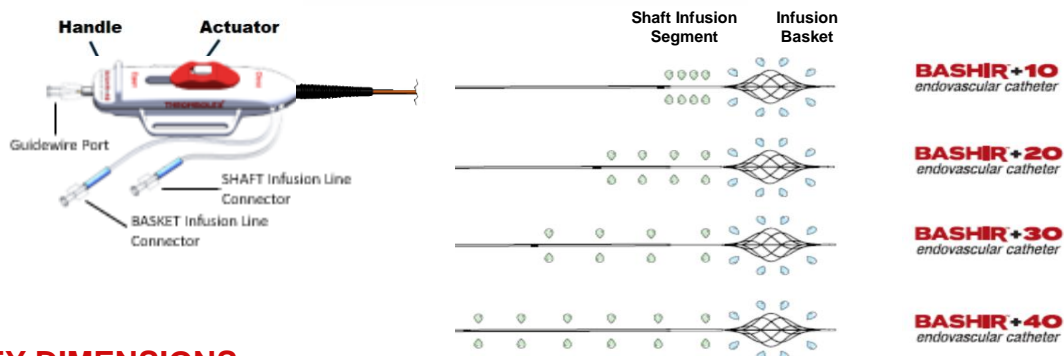
* Suggested initial order quantity of 8 catheters (2 cartons)

To order or for more information,
contact customer service at 1.844.792.6300
or fax your order to 267.224.4436

PRODUCT SPECIFICATIONS

THROMBOLEX™
INNOVATIVE ENDOVASCULAR CATHETERS

BASHIR™+ *endovascular catheter*



KEY DIMENSIONS

French Size	7 F (2.3 mm)
Effective Length	92.50 cm (36.44 in)
Infusion Basket Length	12.50 cm (4.94 in)
Infusion Basket Diameter	45 mm max.
Shaft Infusion Additional Treatment Zone Segment Length	10.00 cm (3.94 in) for +10 20.00 cm (7.87 in) for +20 30.00 cm (11.80 in) for +30 40.00 cm (15.75 in) for +40

CHARACTERISTICS

Basket Expansion	Controlled by actuator
Thrombolytic Infusion	6 mini-infusion catheters with 48 precision laser-drilled holes in the infusion basket, and additionally along the shaft: <ul style="list-style-type: none">• 42 precision laser-drilled holes for +10, +20, +30• 56 precision laser-drilled holes for +40
Guidewire Compatibility	0.018"
Sterilization	Ethylene oxide gas
Use	Single use
Shelf Life	2 years

ORDERING INFORMATION

Product Order Number	7210, 7220, 7230, 7240
Minimum Order Quantity*	Each

* Suggested initial order quantity of 8 catheters (2 cartons)

**To order or for more information,
contact customer service at 1.844.792.6300
or fax your order to 267.224.4436**

PRODUCT CATALOG

THROMBOLEX
INNOVATIVE ENDOVASCULAR CATHETERS

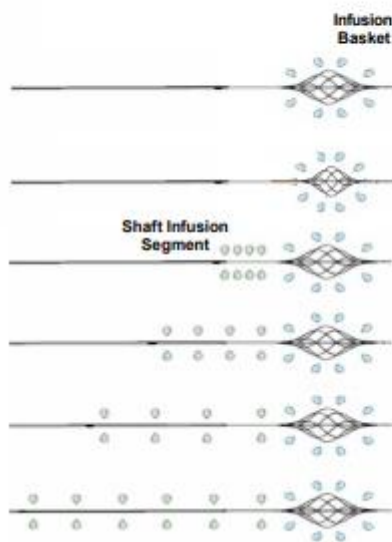
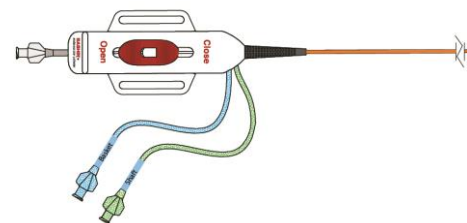
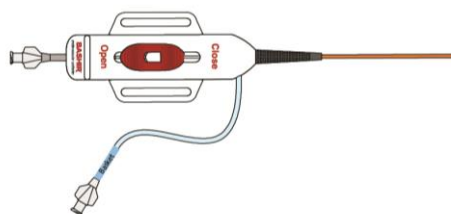
Customer Service: **844.792.6300**

Customer Service Fax: **267.224.4436**

Email Inquiries: **INFO@THROMBOLEX.COM**

Place Orders: **ORDERS@THROMBOLEX.COM**

Website: **WWW.THROMBOLEX.COM**

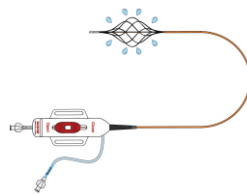


Trade Name	Product No.
BASHIR endovascular catheter	7201
BASHIR S-B endovascular catheter	7101
BASHIR + 10 endovascular catheter	7210
BASHIR + 20 endovascular catheter	7220
BASHIR + 30 endovascular catheter	7230
BASHIR + 40 endovascular catheter	7240

REGULATORY INFORMATION

THROMBOLEX™
INNOVATIVE ENDOVASCULAR CATHETERS

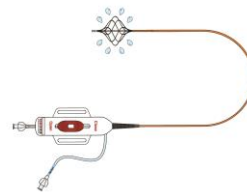
BASHIR™
endovascular catheter



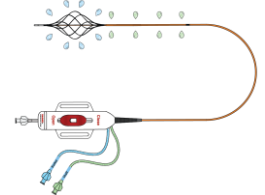
BASHIR™ N-X
endovascular catheter



BASHIR™ S-B
endovascular catheter



BASHIR™+
endovascular catheter



Intended Use	<p>The Bashir™ Endovascular Catheter is intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature, enabling the restoration of blood flow in patients with venous thrombus.</p>		<p>The Bashir™ N-X Endovascular Catheter is intended for the controlled and selective infusion of physician-specified fluids into the peripheral and pulmonary artery vasculature.</p>	<p>The Bashir™ S-B Endovascular Catheter is intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature.</p>	<p>The Bashir™ Plus Endovascular Catheter is intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature, enabling the restoration of blood flow in patients with venous thrombus.</p>
	Trade/Device Name	Bashir™ Endovascular Catheter, Model 7201	Bashir™ N-X Endovascular Catheter, Model 7200	Bashir™ S-B Endovascular Catheter, Model 7101	Bashir™ Plus Endovascular Catheter, Model [7210, 7220, 7230, and 7240]
	510(k) Number	K183290 K211061	K183290	K192598	K193071 K211061
	Clearance Date	25 February 2019	25 February 2019	17 October 2019	17 December 2019
Classification Name	Continuous Flush Catheter				
Regulation Number	21 CFR 870.1210				
FDA Classification	2				
Product Code	KRA – Continuous Flush Catheter				
Classification Panel	Cardiovascular				
Prescriptive Details	For the most current material and IFU, please visit www.thrombolex.com				

Bashir™ Endovascular Catheter Bashir™ N-X Endovascular Catheter



February 25, 2019

Thrombolex, Inc.
% Diane Horwitz
Regulatory Consultant
Eminence Clinical Research Inc.
2995 Steven Martin Dr.
Fairfax, Virginia 22031

Re: K183290

Trade/Device Name: Bashir Endovascular Catheter Model 7201, Bashir N-X Endovascular Catheter Model 7200

Regulation Number: 21 CFR 870.1210

Regulation Name: Continuous Flush Catheter

Regulatory Class: Class II

Product Code: KRA

Dated: January 31, 2019

Received: January 31, 2019

Dear Ms. Horwitz:

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](#).

Bashir™ Endovascular Catheter Bashir™ N-X Endovascular Catheter

K183290 - Diane Horwitz

Page 2

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/CombinationProducts/GuidanceRegulatoryInformation/ucm597488.htm>); 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 <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/MedicalDevices/DeviceRegulationandGuidance/>) and CDRH Learn (<http://www.fda.gov/Training/CDRHLearn>). 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 (<http://www.fda.gov/DICE>) for more information or contact DICE by email (DICE@fda.hhs.gov) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

Gregory 2019.02.25
For O'Connell 16:29:55 -05'00'
Bram D. Zuckerman, M.D.
Director
Division of Cardiovascular Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure

Bashir™ Endovascular Catheter Bashir™ N-X Endovascular Catheter

<p>DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration</p> <p>Indications for Use</p> <hr/> <p>510(k) Number (if known) K183290</p> <hr/> <p>Device Name Bashir™ Endovascular Catheter Model 7201 Bashir™ N-X Endovascular Catheter Model 7200</p> <hr/> <p>Indications for Use (Describe) Bashir™ Endovascular Catheter:</p> <p>The Bashir™ Endovascular Catheter is intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature.</p> <p>Bashir™ N-X Endovascular Catheter:</p> <p>The Bashir™ N-X Endovascular Catheter is intended for the controlled and selective infusion of physician-specified fluids into the peripheral and pulmonary artery vasculature.</p>	<p>Form Approved: OMB No. 0910-0120 Expiration Date: 06/30/2020 See PRA Statement below.</p>
<p>Type of Use (Select one or both, as applicable)</p> <p><input checked="" type="checkbox"/> Prescription Use (Part 21 CFR 801 Subpart D) <input type="checkbox"/> Over-The-Counter Use (21 CFR 801 Subpart C)</p>	
<p>CONTINUE ON A SEPARATE PAGE IF NEEDED.</p>	
<p>This section applies only to requirements of the Paperwork Reduction Act of 1995.</p> <p>*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.*</p> <p>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:</p> <p style="text-align: center;">Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRASaff@fda.hhs.gov</p> <p style="text-align: center;"><i>"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."</i></p>	
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PSC Publishing Services (301) 443-6740 EF	

Bashir™ Endovascular Catheter Bashir™ Plus +10, +20, +30, +40 Endovascular Catheter

<p>DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration</p> <p>Indications for Use</p> <hr/> <p>510(k) Number: K211061</p> <hr/> <p>Device Name BASHIR™ Endovascular Catheter and BASHIR™ Plus Endovascular Catheters (BASHIR™+10, BASHIR™+20, BASHIR™+30, BASHIR™+40)</p> <hr/> <p>Indications for Use (Describe) The BASHIR™ Endovascular Catheter and the BASHIR™ Plus Endovascular Catheters (BASHIR™+10, BASHIR™+20, BASHIR™+30, BASHIR™+40) are intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature, enabling the restoration of blood flow in patients with venous thrombus.</p> <hr/> <p>Type of Use (Select one or both, as applicable) <input checked="" type="checkbox"/> Prescription Use (Part 21 CFR 801 Subpart D) <input type="checkbox"/> Over-The-Counter Use (21 CFR 801 Subpart C) </p> <hr/> <p style="text-align: center;">CONTINUE ON A SEPARATE PAGE IF NEEDED.</p> <hr/> <p style="text-align: center;">This section applies only to requirements of the Paperwork Reduction Act of 1995.</p> <p style="text-align: center;">*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.*</p> <p>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:</p> <p style="text-align: center;">Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRAStaff@fda.hhs.gov</p> <p style="text-align: center;"><i>*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.*</i></p>	<p>Form Approved: OMB No. 0910-0120 Expiration Date: 06/30/2023 See PRA Statement below.</p>
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FD-3881 (Rev. 10/14/15) 107

Bashir™ S-B Endovascular Catheter



FDA U.S. FOOD & DRUG
ADMINISTRATION

October 18, 2019

Thrombolex, Inc.
% Diane Horwitz, PhD
Regulatory Consultant
Eminence Clinical Research, Inc.
5 Lake Como Ct.
Greenville, South Carolina 29609

Re: K192598

Trade/Device Name: Bashir™ S-B Endovascular Catheter, Ref. No. 7101
Regulation Number: 21 CFR 870.1210
Regulation Name: Continuous Flush Catheter
Regulatory Class: Class II
Product Code: KRA
Dated: September 19, 2019
Received: September 20, 2019

Dear Dr. Horwitz:

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

U.S. Food & Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
www.fda.gov

Bashir™ S-B Endovascular Catheter

K192598 - Diane Horwitz, PhD

Page 2

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,

Eleni
For Whatley
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

Digitally signed
by Eleni Whatley
Date: 2019.10.18
09:39:55 -04'00'

Enclosure

Bashir™ S-B Endovascular Catheter

<p>DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration</p> <p>Indications for Use</p> <hr/> <p>510(k) Number (if known) K192598</p> <hr/> <p>Device Name Bashir™ S-B Endovascular Catheter, Ref. No. 7101</p> <hr/> <p>Indications for Use (Describe) The Bashir™ S-B Endovascular Catheter is intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature.</p> <hr/>	<p>Form Approved: OMB No. 0910-0120 Expiration Date: 06/30/2020 See PRA Statement below.</p>
<p>Type of Use (Select one or both, as applicable)</p> <p> <input checked="" type="checkbox"/> Prescription Use (Part 21 CFR 801 Subpart D) <input type="checkbox"/> Over-The-Counter Use (21 CFR 801 Subpart C) </p> <hr/> <p style="text-align: center;">CONTINUE ON A SEPARATE PAGE IF NEEDED.</p> <hr/> <p style="text-align: center;">This section applies only to requirements of the Paperwork Reduction Act of 1995.</p> <p style="text-align: center;">*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.*</p> <p>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:</p> <p style="text-align: center;"> Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRASStaff@fda.hhs.gov </p> <p style="text-align: center;"><i>"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."</i></p>	
<div style="display: flex; justify-content: space-between;"> FORM FDA 3881 (7/17) Page 1 of 1 PSC Publishing Services (301) 443-6740 EF </div>	

Bashir™ Plus Endovascular Catheter



December 17, 2019

Thrombolex, Inc.
% Diane Horwitz
Regulatory
Eminence Clinical Research Inc.
5 Lake Como Ct.
Greenville, South Carolina 29609

Re: K193071
Trade/Device Name: Bashir Plus Endovascular Catheter
Regulation Number: 21 CFR 870.1210
Regulation Name: Continuous Flush Catheter
Regulatory Class: Class II
Product Code: KRA
Dated: November 1, 2019
Received: November 4, 2019

Dear Diane Horwitz:

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

U.S. Food & Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
www.fda.gov

Bashir™ Plus Endovascular Catheter

2K193071 - Diane Horwitz

Page

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,

Gregory W. O'Connell - S

Digitally signed by
Gregory W. O'Connell - S
Date: 2019.12.17
15:11:09 -0500

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

Bashir™ Plus Endovascular Catheter

<p>DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration</p> <p>Indications for Use</p> <hr/> <p>510(k) Number (if known) K193071</p> <hr/> <p>Device Name Bashir™ Plus Endovascular Catheter</p> <hr/> <p>Indications for Use (Describe) The Bashir™ Plus Endovascular Catheters are intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature.</p> <hr/>	<p>Form Approved: OMB No. 0910-0120 Expiration Date: 06/30/2020 See PRA Statement below.</p>
<p>Type of Use (Select one or both, as applicable)</p> <p><input checked="" type="checkbox"/> Prescription Use (Part 21 CFR 801 Subpart D) <input type="checkbox"/> Over-The-Counter Use (21 CFR 801 Subpart C)</p>	
<p>CONTINUE ON A SEPARATE PAGE IF NEEDED.</p>	
<p>This section applies only to requirements of the Paperwork Reduction Act of 1995.</p> <p>*DO NOT SEND YOUR COMPLETED FORM TO THE PRA STAFF EMAIL ADDRESS BELOW.*</p> <p>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:</p> <p style="text-align: center;">Department of Health and Human Services Food and Drug Administration Office of Chief Information Officer Paperwork Reduction Act (PRA) Staff PRASStaff@fda.hhs.gov</p> <p style="text-align: center;"><i>"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."</i></p>	
FORM FDA 3881 (7/17)	Page 1 of 1
PSC Publishing Services (301) 443-6740 EF	

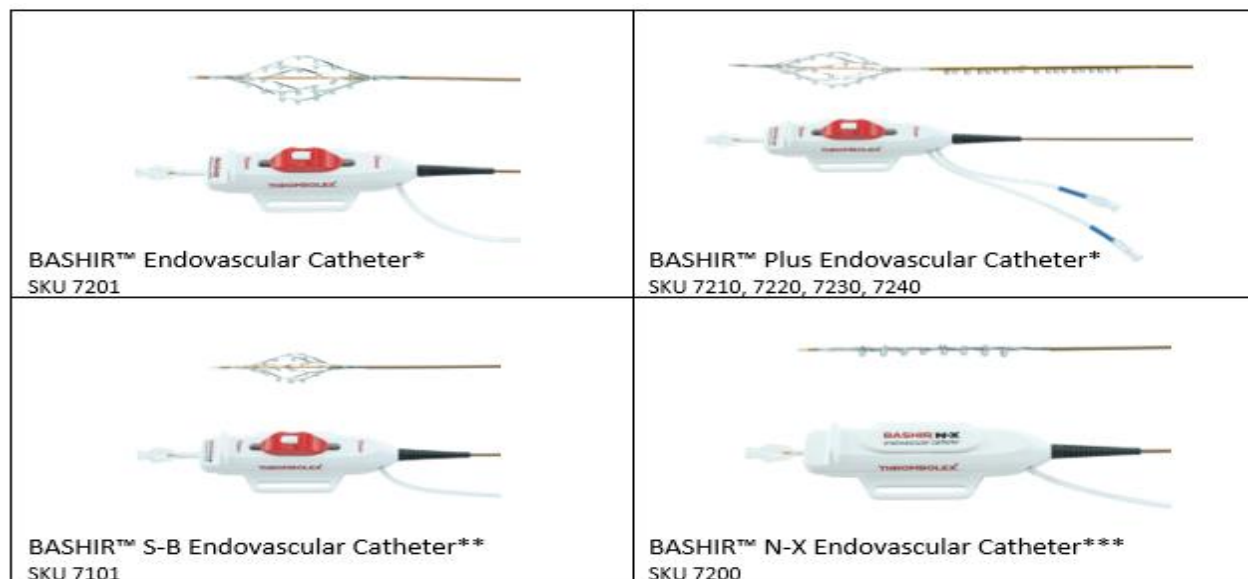
FY 2022 CODING INFORMATION (In effect Oct.1, 2021 thru Sept. 30, 2022)

Thrombolex has received multiple clearances from the FDA for these products:

* **The BASHIR™ Endovascular Catheter and the BASHIR™ Plus Endovascular Catheter** is (are) intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature, enabling the restoration of blood flow in patients with venous thrombus.

****The BASHIR™ S-B Endovascular Catheter** is intended for the controlled and selective infusion of physician-specified fluids, including thrombolytics, into the peripheral vasculature.

*****The BASHIR™ N-X Endovascular Catheter** is intended for the controlled and selective infusion of physician-specified fluids into the peripheral and pulmonary artery vasculature.



ICD-10 Diagnosis Code	Description
Pulmonary Vessels	
I26.0	Pulmonary embolism with acute cor pulmonale
I26.9	Pulmonary embolism without acute cor pulmonale
Thoracic Veins	
I82.29	Embolism and thrombosis of other thoracic veins
Peripheral Veins	
I82.4	Acute embolism and thrombosis of deep veins of lower extremity
Peripheral and Other Arteries	
I74.2	Embolism and thrombosis of arteries of the upper extremities
I74.3	Embolism and thrombosis of arteries of the lower extremities
I74.4	Embolism and thrombosis of arteries of extremities, unspecified
I74.5	Embolism and thrombosis of iliac artery
I74.8	Embolism and thrombosis of other arteries
I74.9	Embolism and thrombosis of unspecified artery

CODING INFORMATION

CPT Code	Description
37211	Transcatheter therapy, arterial infusion for thrombolysis other than coronary or intracranial, any method, including radiological supervision and interpretation, initial treatment day
37212	Transcatheter therapy, venous infusion for thrombolysis, any method, including radiological supervision and interpretation, initial treatment day

ICD-10 Procedure Code	Description	DRG Assignments
Pulmonary Vessels		
02FP3ZZ	Fragmentation of Pulmonary Trunk, Percutaneous Approach	166, 167, 168
02FQ3ZZ	Fragmentation of Right Pulmonary Artery, Percutaneous Approach	166, 167, 168
02FR3ZZ	Fragmentation of Left Pulmonary Artery, Percutaneous Approach	166, 167, 168
02FS3ZZ	Fragmentation of Right Pulmonary Vein, Percutaneous Approach	166, 167, 168
02FT3ZZ	Fragmentation of Left Pulmonary Vein, Percutaneous Approach	166, 167, 168
Upper Arteries		
03F23ZZ	Fragmentation of Innominate Artery, Percutaneous Approach	166, 167, 168
03F33ZZ	Fragmentation of Right Subclavian Artery, Percutaneous Approach	252, 253, 254
03F43ZZ	Fragmentation of Left Subclavian Artery, Percutaneous Approach	252, 253, 254
03F53ZZ	Fragmentation of Right Axillary Artery, Percutaneous Approach	252, 253, 254
03F63ZZ	Fragmentation of Left Axillary Artery, Percutaneous Approach	252, 253, 254
03F73ZZ	Fragmentation of Right Brachial Artery, Percutaneous Approach	252, 253, 254
03F83ZZ	Fragmentation of Left Brachial Artery, Percutaneous Approach	252, 253, 254
03F93ZZ	Fragmentation of Right Ulnar Artery, Percutaneous Approach	252, 253, 254
03FA3ZZ	Fragmentation of Left Ulnar Artery, Percutaneous Approach	252, 253, 254
03FB3ZZ	Fragmentation of Right Radial Artery, Percutaneous Approach	252, 253, 254
03FC3ZZ	Fragmentation of Left Radial Artery, Percutaneous Approach	252, 253, 254
03FY3ZZ	Fragmentation of Upper Artery, Percutaneous Approach	252, 253, 254
Lower Arteries		
04FC3ZZ	Fragmentation of Right Common Iliac Artery, Percutaneous Approach	252, 253, 254
04FD3ZZ	Fragmentation of Left Common Iliac Artery, Percutaneous Approach	252, 253, 254
04FE3ZZ	Fragmentation of Right Internal Iliac Artery, Percutaneous Approach	252, 253, 254
04FF3ZZ	Fragmentation of Left Internal Iliac Artery, Percutaneous Approach	252, 253, 254
04FH3ZZ	Fragmentation of Right External Iliac Artery, Percutaneous Approach	252, 253, 254
04FJ3ZZ	Fragmentation of Left External Iliac Artery, Percutaneous Approach	252, 253, 254
04FK3ZZ	Fragmentation of Right Femoral Artery, Percutaneous Approach	252, 253, 254
04FL3ZZ	Fragmentation of Left Femoral Artery, Percutaneous Approach	252, 253, 254

CODING INFORMATION

04FM3ZZ	Fragmentation of Right Popliteal Artery, Percutaneous Approach	252, 253, 254
04FN3ZZ	Fragmentation of Left Popliteal Artery, Percutaneous Approach	252, 253, 254
04FP3ZZ	Fragmentation of Right Anterior Tibial Artery, Percutaneous Approach	252, 253, 254
04FQ3ZZ	Fragmentation of Left Anterior Tibial Artery, Percutaneous Approach	252, 253, 254
04FR3ZZ	Fragmentation of Right Posterior Tibial Artery, Percutaneous Approach	252, 253, 254
04FS3ZZ	Fragmentation of Left Posterior Tibial Artery, Percutaneous Approach	252, 253, 254
04FT3ZZ	Fragmentation of Right Peroneal Artery, Percutaneous Approach	252, 253, 254
04FU3ZZ	Fragmentation of Left Peroneal Artery, Percutaneous Approach	252, 253, 254
04FY3ZZ	Fragmentation of Lower Artery, Percutaneous Approach	252, 253, 254
Upper Veins		
05F33ZZ	Fragmentation of Right Innominate Vein, Percutaneous Approach	252, 253, 254
05F43ZZ	Fragmentation of Left Innominate Vein, Percutaneous Approach	252, 253, 254
05F53ZZ	Fragmentation of Right Subclavian Vein, Percutaneous Approach	252, 253, 254
05F63ZZ	Fragmentation of Left Subclavian Vein, Percutaneous Approach	252, 253, 254
05F73ZZ	Fragmentation of Right Axillary Vein, Percutaneous Approach	252, 253, 254
05F83ZZ	Fragmentation of Left Axillary Vein, Percutaneous Approach	252, 253, 254
05F93ZZ	Fragmentation of Right Brachial Vein, Percutaneous Approach	252, 253, 254
05FA3ZZ	Fragmentation of Left Brachial Vein, Percutaneous Approach	252, 253, 254
05FB3ZZ	Fragmentation of Right Basilic Vein, Percutaneous Approach	252, 253, 254
05FC3ZZ	Fragmentation of Left Basilic Vein, Percutaneous Approach	252, 253, 254
05FD3ZZ	Fragmentation of Right Cephalic Vein, Percutaneous Approach	252, 253, 254
05FF3ZZ	Fragmentation of Left Cephalic Vein, Percutaneous Approach	252, 253, 254
05FY3ZZ	Fragmentation of Upper Vein, Percutaneous Approach	252, 253, 254
Lower Veins		
06FC3ZZ	Fragmentation of Right Common Iliac Vein, Percutaneous Approach	252, 253, 254
06FD3ZZ	Fragmentation of Left Common Iliac Vein, Percutaneous Approach	252, 253, 254
06FF3ZZ	Fragmentation of Right External Iliac Vein, Percutaneous Approach	252, 253, 254
06FG3ZZ	Fragmentation of Left External Iliac Vein, Percutaneous Approach	252, 253, 254
06FH3ZZ	Fragmentation of Right Hypogastric Vein, Percutaneous Approach	252, 253, 254
06FJ3ZZ	Fragmentation of Left Hypogastric Vein, Percutaneous Approach	252, 253, 254
06FM3ZZ	Fragmentation of Right Femoral Vein, Percutaneous Approach	252, 253, 254
06FN3ZZ	Fragmentation of Left Femoral Vein, Percutaneous Approach	252, 253, 254
06FP3ZZ	Fragmentation of Right Saphenous Vein, Percutaneous Approach	252, 253, 254
06FQ3ZZ	Fragmentation of Left Saphenous Vein, Percutaneous Approach	252, 253, 254
06FY3ZZ	Fragmentation of Lower Vein, Percutaneous Approach	252, 253, 254

DRG	Description
166	OTHER RESP SYSTEM O.R. PROCEDURES W MCC
167	OTHER RESP SYSTEM O.R. PROCEDURES W CC
168	OTHER RESP SYSTEM O.R. PROCEDURES W/O CC/MCC
252	OTHER VASCULAR PROCEDURES W MCC
253	OTHER VASCULAR PROCEDURES W CC
254	OTHER VASCULAR PROCEDURES W/O CC/MCC

The above listing of codes is not exhaustive. There may be other codes for endovascular catheter procedures. There are codes for thrombolysis procedures. CMS defines “**FRAGMENTATION**” as “Breaking solid matter in a body part into pieces. The pieces of solid matter are not taken out.”

DISCLAIMER: The materials contained in this document are presented for general informational purposes only, are only effective from October 1, 2021 thru September 30, 2022, and have been gathered from third-party sources, and are subject to change without notice. Nothing in this document is intended to represent, constitute, or may be construed as legal, coding, business, financial, clinical, or consultative advice, recommendation, or instruction. Thrombolex expressly and explicitly disclaims any accuracy, reliability, or completeness and does not promise or guarantee any coverage or reimbursement by any health insurance plan. **The ultimate responsibility for documentation and coding always remains with the healthcare provider.** Healthcare providers should consult their own advisors. Refer to these official sources for further information:

1. ICD-10 diagnosis codes are maintained by the World Health Organization.
2. CPT-4 codes are maintained and copyrighted by the American Medical Association.
3. ICD-10-PCS and DRG codes are maintained by the Centers for Medicare & Medicaid Services of the U.S. Department of Health & Human Services (“CMS”).

For prescribing and safety information please see <https://www.thrombolex.com>.

Thrombolex, Inc.
October 1, 2021

Print or type.
See Specific Instructions on page 3.

Part II	Certification
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1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined below); and
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

Date ► 2/14/2020

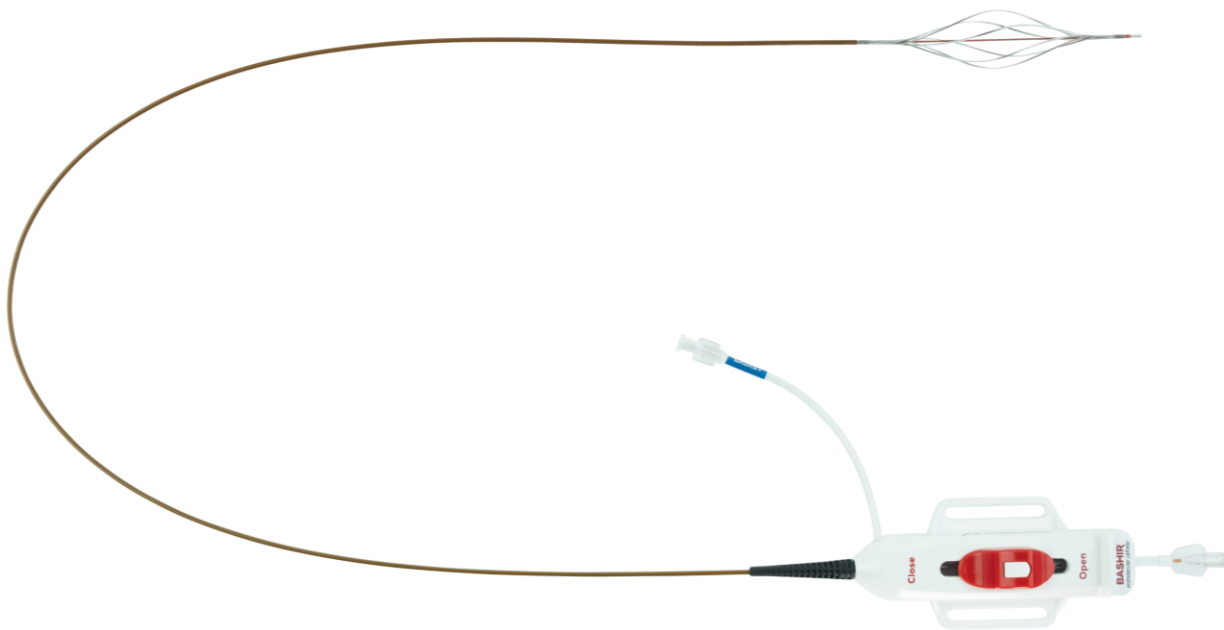
Section references are to the Internal Revenue Code unless otherwise noted.

Future developments. For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/FormW9.

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following.

- Form 1099-DIV (dividends, including those from stocks or mutual funds)
 - Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
 - Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
 - Form 1099-S (proceeds from real estate transactions)
 - Form 1099-K (merchant card and third party network transactions)
 - Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)
 - Form 1099-C (canceled debt)
 - Form 1099-A (acquisition or abandonment of secured property)
- Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See What is backup withholding, later.



THROMBOLEX™
INNOVATIVE ENDOVASCULAR CATHETERS

**To order or for more information,
contact customer service at 1.844.792.6300
or fax your order to 267.224.4436**

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