



**SUBSTANTIALLY EQUIVALENT**

March 20, 2020

RedDress, Ltd.  
c/o Janice Hogan  
Hogan Lovells  
1735 Market Street, 23rd Floor  
Philadelphia, PA 19104

Re: BK200464

Trade/Device Name: RedDress RD2 System  
Regulation Number: 21 CFR 864.9245  
Regulation Name: Automated blood cell separator  
Regulatory Class: Class II  
Common Name: Peripheral Blood Processing Device for Wound Management  
Product Code: PMQ  
Dated: February 21, 2020  
Received: February 21, 2020

Dear Ms. Hogan:

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: CBER does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803) for devices or postmarketing safety reporting (21 CFR 4, Subpart B) for combination products (see <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820) for devices or current good manufacturing practices (21 CFR 4, Subpart A) for combination products; and, if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <https://www.fda.gov/medical-devices/medical-device-safety/medical-device-reporting-mdr-how-report-medical-device-problems>.

For comprehensive regulatory information about medical devices and radiation-emitting products, including information about labeling regulations, please see Device Advice (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance>) and CDRH Learn (<https://www.fda.gov/training-and-continuing-education/cdrh-learn>). Additionally, you may contact the Division of Industry and Consumer Education (DICE) to ask a question about a specific regulatory topic. See the DICE website (<https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/contact-us-division-industry-and-consumer-education-dice>) for more information or contact DICE by email ([DICE@fda.hhs.gov](mailto:DICE@fda.hhs.gov)) or phone (1-800-638-2041 or 301-796-7100).

Sincerely,

**Wilson Bryan -S**

Digitally signed by Wilson Bryan -S  
DN: c=US, o=U.S. Government, ou=HHS,  
ou=FDA, ou=People, cn=Wilson Bryan -S,  
0.9.2342.19200300.100.1.1=0011265579  
Date: 2020.03.20 12:32:48 -04'00'

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

Enclosure: Indications for Use

**Indications for Use (CBER/OTAT)**

510(k) Number (if known): BK200464

Device Name: RedDress RD2 System

Indications for Use:

The RD2 System is intended to be used at point-of-care for the safe and rapid preparation of Whole Blood Clot (WBC) gel from a small sample of a patient’s own peripheral blood. Under the supervision of a healthcare professional, the WBC gel produced by the RD2 System is topically applied for the management of exuding cutaneous wounds, such as leg ulcers, pressure ulcers, diabetic ulcers, and mechanically or surgically-debrided wounds.

Prescription Use  AND/OR Over-The-Counter Use

(Part 21 CFR 801 Subpart D)

(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CBER, Office of Tissues and Advanced Therapies

**Wilson Bryan -**

**S**

Digitally signed by Wilson Bryan -S  
DN: c=US, o=U.S. Government, ou=HHS,  
ou=FDA, ou=People, cn=Wilson Bryan -S,  
0.9.2342.19200300.100.1.1=0011265579  
Date: 2020.03.20 12:32:09 -04'00'

Office Sign-Off  
Office of Tissues and Advanced Therapies

510(k): BK200464