

LATHAM & WATKINS LLP

July 6, 2026

BY EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

FIRM / AFFILIATE OFFICES

Austin	Milan
Beijing	Munich
Boston	New York
Brussels	Orange County
Chicago	Paris
Dubai	Riyadh
Düsseldorf	San Diego
Frankfurt	San Francisco
Hamburg	Seoul
Hong Kong	Silicon Valley
Houston	Singapore
London	Tel Aviv
Los Angeles	Tokyo
Madrid	Washington, D.C.

Re: Dkt. No. 3918: *Certain Dermatological Treatment Devices and Components Thereof II*

Dear Secretary Barton:

Complainant Serendia, LLC (“Serendia” or “Complainant”) submits the following information as a supplement to its Complaint:

1. Paragraph 3.2 of the Complaint should be replaced with the following: “Upon information and belief, **InMode Ltd.**, itself and through its subsidiaries and related entities, designs, develops, manufactures, sells for importation, imports into the United States, and/or sells after importation into the United States health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business. **Exhibit 19** at 12 (identifying the InMode Accused Products as “Manufactured by InMode Ltd, Israel”).
2. Paragraph 3.3 of the Complaint should be replaced with the following: “Upon information and belief, **Invasix Inc.**, itself and through its subsidiaries and related entities, designs, develops, manufactures, sells for importation, imports into the United States, and/or sells after importation into the United States health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business. **Exhibit 48** at 63 (identifying Invasix Inc. as the entity responsible for InMode’s U.S. operations, “our U.S. subsidiary, Invasix Inc., signed a leasing agreement for an approximately 24-thousandsquare-foot facility located in Orange County, California, to support our operations in the U.S.”).

3. Paragraph 3.13 of the Complaint should be replaced with the following: “Upon information and belief, **BTL Industries, Inc.**, itself and through its subsidiaries and related entities, designs, develops, manufactures, sells for importation, imports into the United States, sells after importation into the United States, and/or uses health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business. **Exhibit 37** at 84 (identifying BTL Industries, Inc. as the U.S. distributor of the BTL Accused Products).”
4. Paragraph 3.14 of the Complaint should be replaced with the following: “Upon information and belief, **BTL Industries Limited**, itself and through its subsidiaries and related entities, designs, develops, manufactures, sells for importation, imports into the United States, and/or sells after importation into the United States health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business. **Exhibit 24** at 7 (identifying “BTL Industries Ltd.” as the manufacturer of the BTL Accused Products), **Exhibit 37** at 84 (identifying BTL Industries, Ltd. as the manufacturer of the BTL Accused Products).”
5. Paragraph 3.15 of the Complaint should be replaced with the following: “Upon information and belief, **BTL Industries JSC**, itself and through its subsidiaries and related entities, designs, develops, manufactures, sells for importation, imports into the United States, sells after importation into the United States, and/or uses health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business. **Exhibit 49** at 4 (“This company is engaged in the manufacture and sale of medical equipment used in physical therapy, cardiology and aesthetic medicine fields.”). *See also*, **Exhibit 50** (identifying BTL Industries JSC as the shipper of “medical equipment”), **Exhibit 51** (identifying BTL Industries as the owner of the Exion trademark for medical apparatuses and instruments), **Exhibit 52** (describing BTL Industries’ “legal entity type” as “JSC”). On information and belief, BTL Industries JSC is involved in the manufacture and importation of the BTL Accused Products.”
6. Paragraph 3.16 of the Complaint should be replaced with the following: “Upon information and belief, **BTL Healthcare Technologies A/S**, itself and through its subsidiaries and related entities, designs, develops, manufactures, sells for importation, imports into the United States, sells after importation into the United States, and/or uses health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business. For example, BTL Healthcare Technologies A/S is identified as the applicant or assignee for various patents related to treatment of patients using radiofrequency. *See Exhibit 53* and **Exhibit 54**. *See also*, **Exhibit 55** (identifying BTL Healthcare Technologies A/S as “a distributors company.”). Upon information and belief, BTL Healthcare

Technologies A/S designs and sells for importation into the United States the BTL Accused Products.

7. Paragraph 3.17 of the Complaint should be replaced with the following: “Upon information and belief, **BTL Enterprise Group A/S**, itself and through its subsidiaries, including **BTL Healthcare Technologies A/S** and **BTL Medical Technologies S.R.O.**, and related entities, designs, develops, manufactures, sells for importation, imports into the United States, sells after importation into the United States, and/or uses health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business.
8. Paragraph 3.18 of the Complaint should be replaced with the following: “Upon information and belief, **BTL Medical Technologies S.R.O.**, itself and through its subsidiaries and related entities, designs, develops, manufactures, sells for importation, imports into the United States, sells after importation into the United States, and/or uses health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business. For example, BTL Medical Technologies S.R.O. is identified as the former assignee for a patent related to the treatment of patients’ wrinkles using electrical currents. *See Exhibit 56. See also, Exhibit 57* identifying BTL Medical Technologies S.R.O. as “an electronic components company.”). Upon information and belief, BTL Medical Technologies S.R.O. designs and manufactures components for the BTL Accused Products.
9. Paragraph 3.19 of the Complaint should be replaced with the following: “Upon information and belief, **BTL Holding Limited**, itself and through its subsidiaries and related entities, designs, develops, manufactures, sells for importation, imports into the United States, sells after importation into the United States, and/or uses health care equipment, including RF microneedling dermatological treatment devices and components thereof. Upon information and belief, this is the primary nature of its business. **Exhibit 58** at 1 (identifying BTL Holding Limited as the “[s]ole parent company of BTL Industries, Inc.,” the U.S. distributor of the BTL Accused Products).
10. Paragraph 4.1 of the Complaint should be replaced with the following: “Pursuant to 19 C.F.R. § 210.12(a)(12), the category of products accused are RF microneedling dermatological treatment devices and components thereof, Paragraph 4.1 of the Complaint should be replaced with the following: “Pursuant to 19 C.F.R. § 210.12(a)(12), the category of products accused are RF microneedling dermatological treatment devices and components thereof, including the consoles, handpieces, and needle tips.”
11. Paragraph 10.1 of the Complaint should be replaced with the following: “The Asserted Patents are the subject of civil actions in the United States District Court for the Central District of California contemporaneously naming InMode as

defendant and in the District of Massachusetts contemporaneously naming BTL as defendant.”

12. Section VII.A is amended to include the following paragraph:

7.5.1 On information and belief, InMode continues to sell for importation, import, and sell after importation into the United States the InMode Accused Products. For example, InMode’s U.S. website advertises InMode’s “multi-modality approach for comprehensive treatment offerings, from the deep fractional remodeling of Morpheus8 to the hands-free body transformation of EvolveX.” **Exhibit 59.** *See also, Exhibit 60*, <https://www.buckheadfacial.com/blog/quantumrf-and-morpheus8-introducing-our-newest-technology-from-inmode/> at 0:11 (U.S.-based Buckhead Facial’s March 2025 advertisement of its Morpheus8 “newest technology from InMode”) (excerpt below).

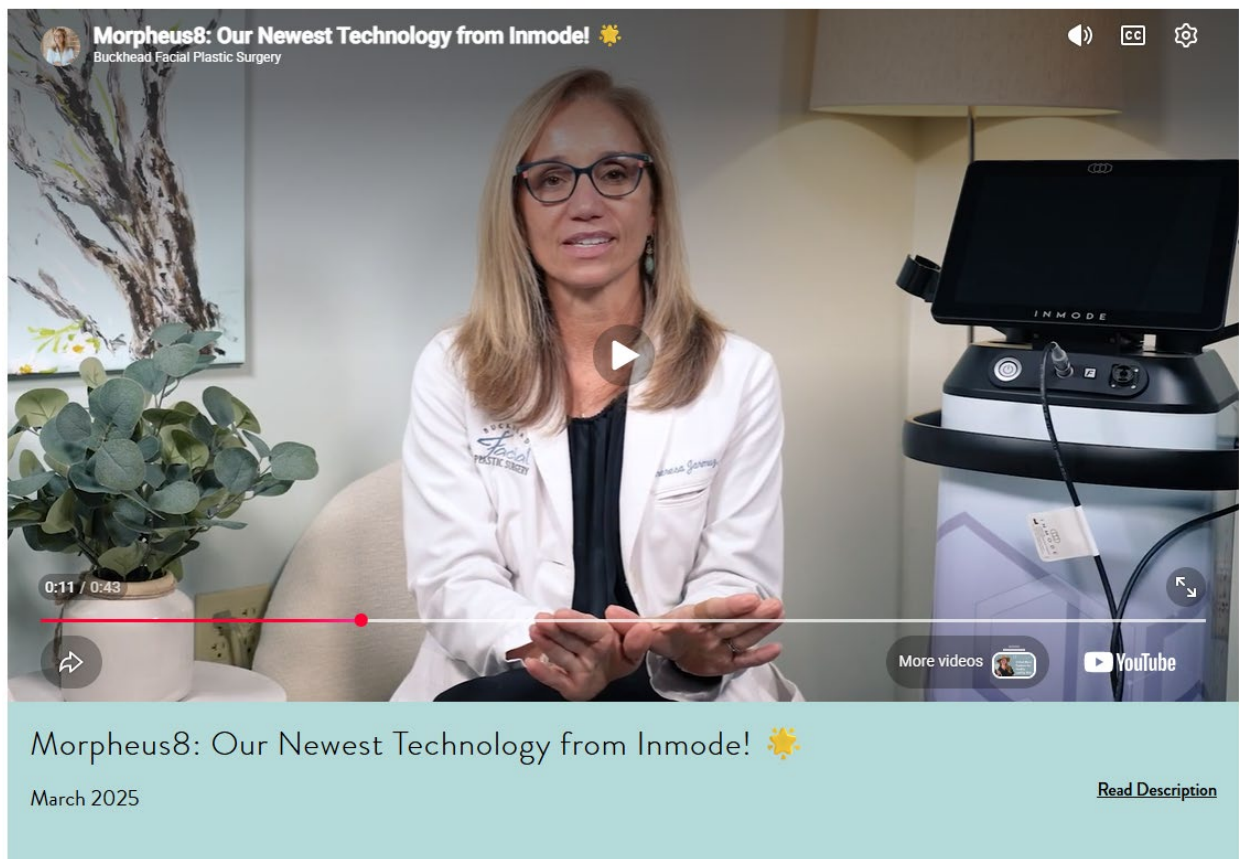


Exhibit 61, <https://www.youtube.com/watch?v=9NEMgg2qFY&t=105s> at 0:04 (U.S.-based Evolve Health and Wellness Medspa discussing the Morpheus8 treatments it offers to patients) (excerpt below).

The image shows a YouTube video player interface. At the top, there is a search bar and a microphone icon. The video player itself is a large rectangle with a grey background. In the center of the video, the text "HOW MANY PATIENTS HAVE YOU TREATED WITH MORPHEUS8" is displayed in white, with a large teal question mark below it. In the top right corner of the video player, the "INMODE" logo is visible. Below the video player, the title "Morpheus8 Medspa Testimonial by Evolve Health and Wellness" is shown. Under the title, there is a channel icon for "InMode International" with 7.32K subscribers and a "Subscribe" button. To the right of the channel information are icons for likes (0), comments, share, save, download, and a menu icon. Below these icons, it says "157 views 1 year ago". At the bottom, a disclaimer states: "The content posted by this account is intended for international providers and patients. Approved intended use varies by country - check with local providers or representatives. Individual treatment results may vary. ...more".

YouTube

Search

INMODE

HOW MANY PATIENTS HAVE YOU
TREATED WITH MORPHEUS8

Morpheus8 Medspa Testimonial by Evolve Health and Wellness

Unlisted

InMode International
7.32K subscribers

Subscribe

0 | | Share | Save | Download | ...

157 views 1 year ago

The content posted by this account is intended for international providers and patients. Approved intended use varies by country - check with local providers or representatives. Individual treatment results may vary. ...more

Exhibit 62,
https://www.facebook.com/profile.php?id=100066467991356&locale=mt_MT#
(Hope Wellness and Recovery Center of Columbus, Ohio September 15, 2025 announcement that Morpheus8 Burst and Morpheus8 Burst Deep device had “just arrived at Hope Medical Center!”) (excerpt below).

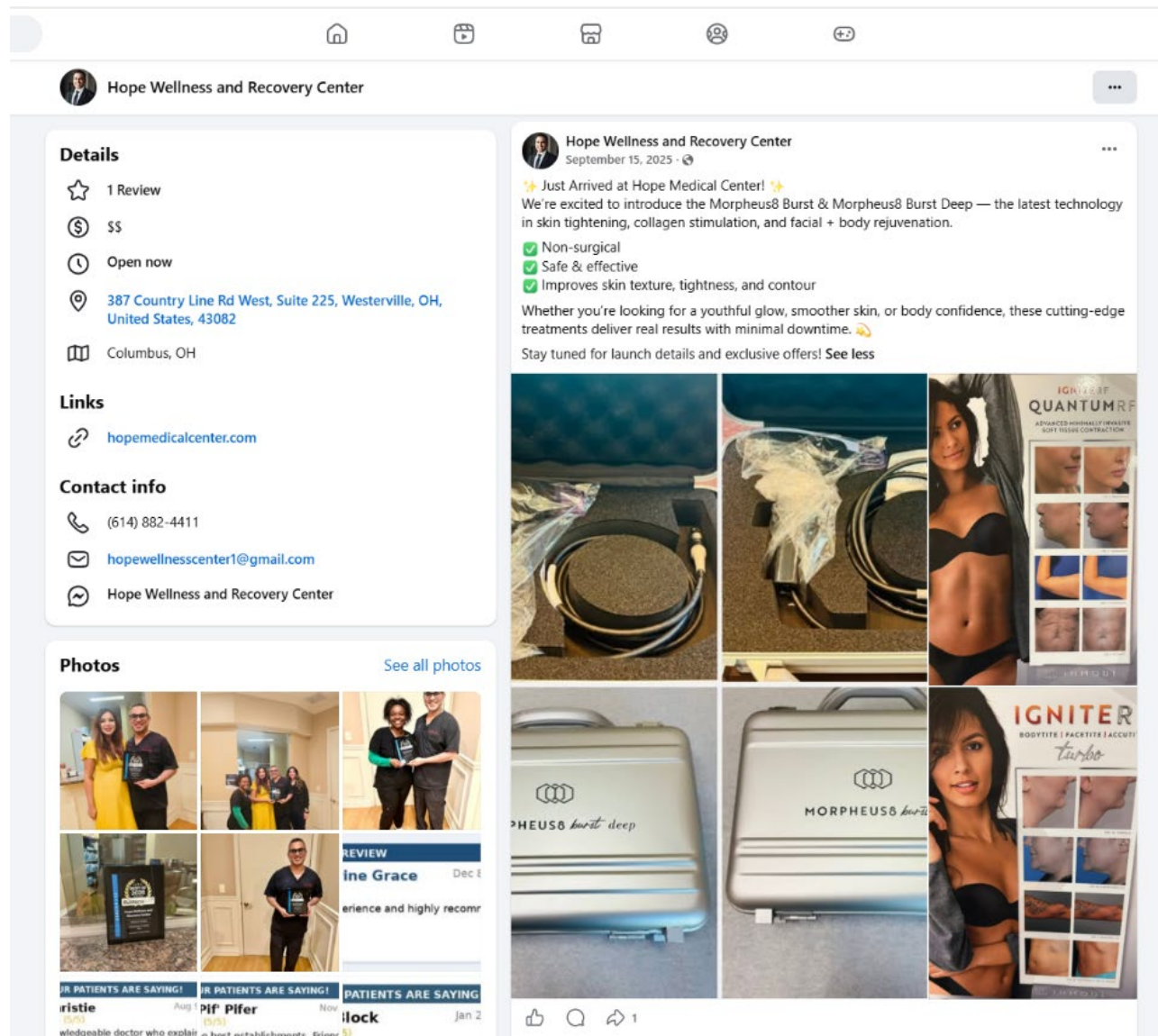
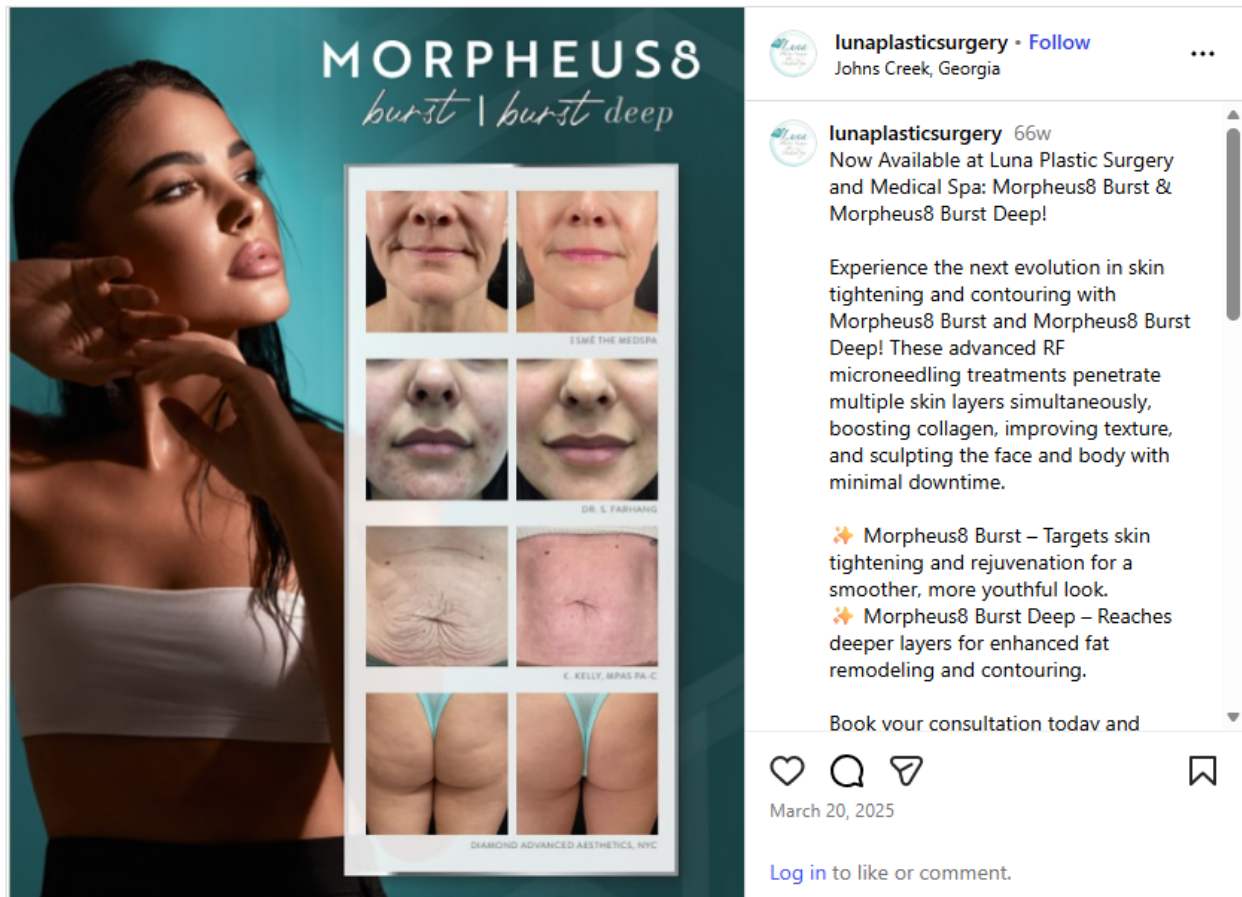


Exhibit 63, <https://www.instagram.com/p/DHbxKvIPqbg/> (Luna Plastic Surgery of Johns Creek, Georgia advertising on March 20, 2025 that treatments with Morpheus8 Burst and Morpheus8 Burst Deep were “now available”) (excerpt below).



13. Section VII.B is amended to include the following paragraph:

7.10 On information and belief, BTL continues to sell for importation, import, and sell after importation into the United States the BTL Accused Products. For example, Capital Laser & Skin Care, of Chevy Chase, Maryland, posted a November 3, 2025 “new treatment alert” video advertising the treatments it provides using the BTL Accused Products. **Exhibit 64**, <https://www.facebook.com/watch/?v=1167683871988452> at 0:03 (excerpt below).

LATHAM & WATKINS LLP

Capital Laser & Skin Care

Details

100% recommend (11 Reviews)

\$\$

Closing Soon

5471 Wisconsin Ave, Chevy Chase, MD, United States, 20815

Links

capitalskinlaser.com

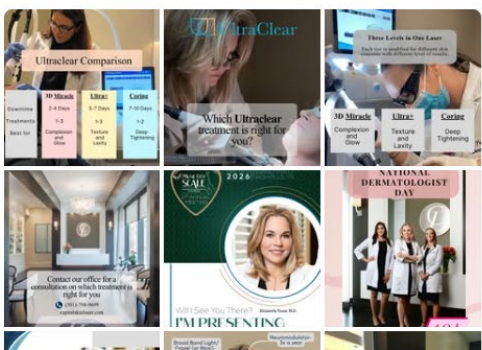
Contact info

 (240) 802-2993

Capital Laser & Skin Care

Photos

See all photos



Capital Laser & Skin Care is with Dr Geeta Shah and Dr. Tania Peters.
November 3, 2025 · 🌐

Exion Clear Radiofrequency microablation is a new technology we are pleased to bring to our patients. After completing two clinical studies with the device (and having ... See more



3





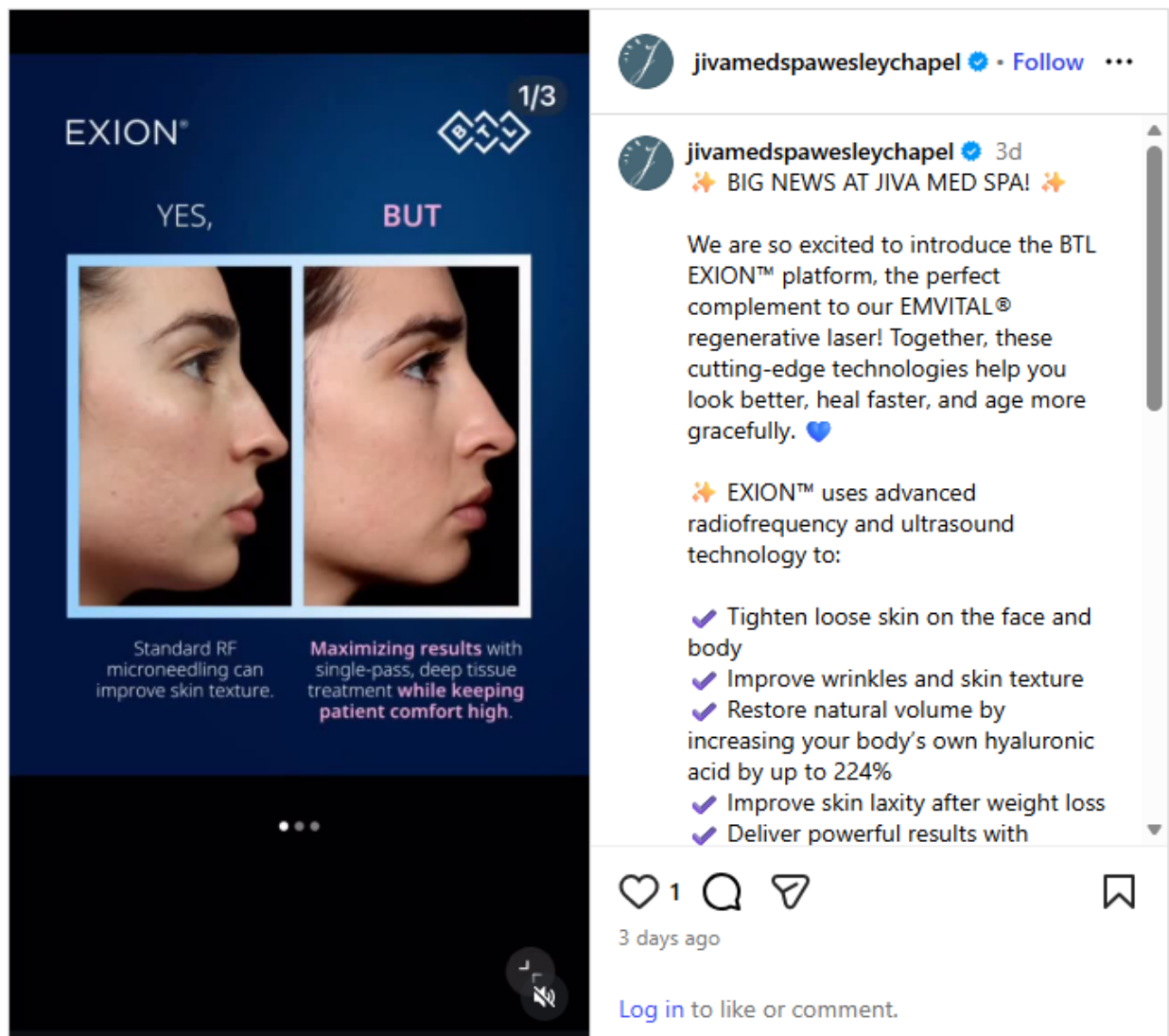


See also, Exhibit 65, <https://www.instagram.com/reel/DPOZGLWDozj/> (Luna Sol Med Spa of Wake Forest North Carolina advertised on September 30, 2025 that the BTL Exion RF Microneedling was “now available at our Wake Forest office”) (excerpt below).

LATHAM & WATKINS LLP



Exhibit 66, <https://www.instagram.com/reel/DaDJW3whJSq/> (Jiva Med Spa of Columbus Ohio advertised on June 26, 2026 “We are so excited to introduce the BTL EXION™ platform”) (excerpt below).



14. **Public Exhibit 10** is replaced with the attached supplemental **Public Exhibit 10**.
15. **Exhibit 24** is replaced with the attached supplemental **Exhibit 24**.
16. **Public Exhibit 26** is replaced with the attached supplemental **Public Exhibit 26**.
17. New **Exhibit 48**, **Exhibit 49**, **Exhibit 50**, **Exhibit 51**, **Exhibit 52**, **Exhibit 53**, **Exhibit 54**, **Exhibit 55**, **Exhibit 56**, **Exhibit 57**, **Exhibit 58**, **Exhibit 59**, **Exhibit 60**, **Exhibit 61**, **Exhibit 62**, **Exhibit 63**, **Exhibit 64**, **Exhibit 65**, and **Exhibit 66** are attached.

LATHAM & WATKINS^{LLP}

Thank you for your attention to this matter. Please do not hesitate to contact me with any questions regarding this submission.

Respectfully submitted,

/s/ Kevin C. Wheeler
Kevin C. Wheeler
of LATHAM & WATKINS LLP

Enclosures