

**CENTER FOR DRUG EVALUATION AND  
RESEARCH**

*APPLICATION NUMBER:*

**NDA 22-249**

**APPROVAL LETTER**



NDA 22-249

**NDA APPROVAL**

Cephalon, Inc.  
Attention: Carol S. Marchione  
Senior Director and Group Leader  
41 Moores Road  
Frazer, PA 19355

Dear Ms. Marchione:

Please refer to your new drug application (NDA) dated September 19, 2007, received September 20, 2007, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for TREANDA<sup>®</sup> (bendamustine hydrochloride) for Injection, for intravenous infusion.

We acknowledge receipt of your submissions dated October 3, 18, 22, 24, 26, November 1, 2, 9, 15 (2), 27, 28, December 10 and 17, 2007, January 7 (2), 8, 11, 14, 15, 17, 18, 23, 24, 25, 28, 31, February 12, 13, 14, 20, 22, 25, 28, March 3, 6, 7, 12, 13 (2), 14, 17 (2), 18 (electronic) and 19 (4 electronic), 2008.

This new drug application provides for the use of TREANDA<sup>®</sup> (bendamustine hydrochloride) for Injection, for intravenous infusion, for the treatment of patients with chronic lymphocytic leukemia (CLL). Efficacy relative to first line therapies other than chlorambucil has not been established.

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

An expiration dating period of 24 months is granted when stored as recommended in the approved product labeling. You may extend the expiration dating based on accrual of real-time stability data and report this in an annual report for this NDA.

As soon as possible, but no later than 14 days from the date of this letter, please submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format as described at <http://www.fda.gov/oc/datacouncil/spl.html> that is identical to the enclosed labeling (text for the package insert). Upon receipt, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission, "SPL for approved NDA 22-249."

We acknowledge your March 13, 2008, submission containing final printed carton and container labels.

Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

This application was not referred to the Oncologic Drugs Advisory Committee because the improvements in response rate and progression-free survival with bendamustine compared to chlorambucil were clinically and statistically robust and the safety profile is comparable to other therapies used for the treatment of CLL.

We remind you of your postmarketing study commitments in your submission dated March 19 (electronic), 2008. These commitments are listed below.

1. Cephalon commits to providing an updated study report of Protocol 02CLLIII titled "*Phase III, Open-Label, Randomized, Multicenter Efficacy and Safety Study of Bendamustine Hydrochloride Versus Chlorambucil in Treatment-Naive Patients with (Binet Stage B/C) B-CLL Requiring Therapy*" at data cut off date in May 2008. Response rate, progression-free survival, overall survival and safety updates will be provided in this study report.

Protocol Submission: N/A

Study Start: N/A

Final Report Submission: February, 2009

2. Cephalon commits to submitting the results and data from the ADME Study 1039 titled "An Open-Label Study to Investigate the Pharmacokinetics (Distribution, Metabolism, and Excretion) of Bendamustine Hydrochloride Following Intravenous Infusion of [<sup>14</sup>C]Bendamustine Hydrochloride in Patients With Relapsed or Refractory Malignancy (Hematologic or Nonhematologic)". Results from this study may indicate a need for dedicated renal and/or hepatic organ impairment studies.

Protocol Submission: May, 2008

Study Start: December, 2008

PK Report Submission: December, 2009

Final Report Submission: March, 2010

3. Cephalon commits to conducting a study to assess the potential for bendamustine to prolong the QT interval in patients. The QT plan will be submitted prior to initiation for IRT review and concurrence.

Protocol Submission: July, 2008

Study Start: December, 2008

Final Report Submission: June, 2010

4. Since bendamustine is a CYP1A2 substrate *in vitro*, Cephalon agrees to perform an *in vivo* drug interaction study of the ability of fluvoxamine (CYP1A2 inhibitor) to alter the pharmacokinetics of a single dose of bendamustine. The necessity to conduct this study will be predicated upon the results from Study 1039.

Protocol Submission: March, 2010

Study Start: September, 2010

PK Report Submission: January, 2012

Final Report Submission: July, 2012

5. Since bendamustine is a CYP1A2 substrate *in vitro*, Cephalon agrees to perform an *in vivo* drug interaction study of the ability of smoking (CYP1A2 inducer) to alter the pharmacokinetics of a single dose of bendamustine. The necessity to conduct this study will be predicated upon the results from Study 1039.

Protocol Submission: March, 2010  
Study Start: September, 2010  
PK Report Submission: July, 2012  
Final Report Submission: December, 2012

6. Cephalon commits to conducting *in vitro* screens to determine if bendamustine is a p-glycoprotein substrate or inhibitor.

Protocol Submission: March, 2008  
Study Start: September, 2007  
Final Report Submission: June, 2008

7. Cephalon commits to assess the physico-chemical compatibility of Treanda with the following diluents as admixtures to reconstituted TREANDA: [redacted] [redacted] sodium chloride).

Protocol submission: April 1, 2008  
Study start: May 15, 2008  
Final Report: September 1, 2008

Submit clinical protocols to your IND for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all study final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii), you should include a status summary of each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies, number of patients entered into each study. All submissions, including supplements, relating to these postmarketing study commitments should be prominently labeled "Postmarketing Study Commitment Protocol," "Postmarketing Study Commitment Final Report," or "Postmarketing Study Commitment Correspondence."

We also remind you of your agreement dated February 12, 2008, to initiate change controls for all the documents impacted by the revision to the maximum hold time not to exceed [redacted] [redacted] and to submit appropriate post-approval correspondence reflecting this change in the next annual report.

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert(s) to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Drug Marketing, Advertising, and Communications  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert(s), at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see [www.fda.gov/cder/ddmac](http://www.fda.gov/cder/ddmac).

If you issue a letter communicating important safety related information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit an electronic copy of the letter to both this NDA and to the following address:

MedWatch  
Food and Drug Administration  
HFD-001, Suite 5100  
5515 Security Lane  
Rockville, MD 20852

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at [www.fda.gov/medwatch/report/mmp.htm](http://www.fda.gov/medwatch/report/mmp.htm).

If you have any questions, please call Frank H. Cross, Jr., Regulatory Project Manager, at (301) 796-0876.

Sincerely,

*{See appended electronic signature page}*

Richard Pazdur, M.D.  
Office Director  
Office of Oncology Drug Products  
Center for Drug Evaluation and Research

Enclosure

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.