

**CENTER FOR DRUG EVALUATION AND  
RESEARCH**

*APPLICATION NUMBER:*

**206276Orig1s000**

**MEDICAL REVIEW(S)**

Clinical Investigator Financial Disclosure NDA 206276  
Review Template

Application Number: 206276

Submission Date(s): July 30, 2014

Applicant: Alcon Laboratories

Product: Olopatadine hydrochloride 0.7%

Reviewer: Wiley A. Chambers, MD

Date of Review: December 14, 2014

Covered Clinical Study (Name and/or Number): C-10-126

Was a list of clinical investigators provided:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request list from applicant)
Total number of investigators identified: <u>3</u>		
Number of investigators who are sponsor employees (including both full-time and part-time employees): <u>0</u>		
Number of investigators with disclosable financial interests/arrangements (Form FDA 3455): <u>0</u>		
<p>If there are investigators with disclosable financial interests/arrangements, identify the number of investigators with interests/arrangements in each category (as defined in 21 CFR 54.2(a), (b), (c) and (f)):</p> <p>Compensation to the investigator for conducting the study where the value could be influenced by the outcome of the study: _____</p> <p>Significant payments of other sorts: _____</p> <p>Proprietary interest in the product tested held by investigator: _____</p> <p>Significant equity interest held by investigator in sponsor of covered study: _____</p>		
Is an attachment provided with details of the disclosable financial interests/arrangements:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request details from applicant)
Is a description of the steps taken to minimize potential bias provided:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request information from applicant)
Number of investigators with certification of due diligence (Form FDA 3454, box 3) <u>0</u>		
Is an attachment provided with the reason:	Yes <input type="checkbox"/>	No <input type="checkbox"/> (Request explanation from applicant)

Covered Clinical Study (Name and/or Number): C-12-053

Was a list of clinical investigators provided:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request list from applicant)
Total number of investigators identified: <u>6</u>		
Number of investigators who are sponsor employees (including both full-time and part-time employees): <u>0</u>		
Number of investigators with disclosable financial interests/arrangements (Form FDA 3455): <u>0</u>		
<p>If there are investigators with disclosable financial interests/arrangements, identify the number of investigators with interests/arrangements in each category (as defined in 21 CFR 54.2(a), (b), (c) and (f)):</p> <p>Compensation to the investigator for conducting the study where the value could be influenced by the outcome of the study: _____</p> <p>Significant payments of other sorts: _____</p> <p>Proprietary interest in the product tested held by investigator: _____</p> <p>Significant equity interest held by investigator in sponsor of covered study: _____</p>		
Is an attachment provided with details of the disclosable financial interests/arrangements:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request details from applicant)
Is a description of the steps taken to minimize potential bias provided:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request information from applicant)
Number of investigators with certification of due diligence (Form FDA 3454, box 3) <u>0</u>		
Is an attachment provided with the reason:	Yes <input type="checkbox"/>	No <input type="checkbox"/> (Request explanation from applicant)

Covered Clinical Study (Name and/or Number): C-12-028

Was a list of clinical investigators provided:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request list from applicant)
Total number of investigators identified: <u>15</u>		
Number of investigators who are sponsor employees (including both full-time and part-time employees): <u>0</u>		
Number of investigators with disclosable financial interests/arrangements (Form FDA 3455): <u>1</u>		
If there are investigators with disclosable financial interests/arrangements, identify the number of investigators with interests/arrangements in each category (as defined in 21 CFR 54.2(a), (b), (c) and (f):  Compensation to the investigator for conducting the study where the value could be influenced by the outcome of the study: <u>0</u>  Significant payments of other sorts: <u>1</u>  Proprietary interest in the product tested held by investigator: <u>0</u>  Significant equity interest held by investigator in sponsor of covered study: <u>0</u>		
Is an attachment provided with details of the disclosable financial interests/arrangements:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request details from applicant)
Is a description of the steps taken to minimize potential bias provided:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (Request information from applicant)
Number of investigators with certification of due diligence (Form FDA 3454, box 3) <u>0</u>		
Is an attachment provided with the reason:	Yes <input type="checkbox"/>	No <input type="checkbox"/> (Request explanation from applicant)

The applicant has adequately disclosed financial interests/arrangements with clinical investigators. The one reported interest is not likely to raise questions about the integrity of the data because the studies were multicenter, masked trials and the one investigator with a potential interest was responsible for a small percentage of the overall application. The applicant reports that they took the following steps to minimize potential bias:

- The studies were double-masked in which patients were randomized sequentially at each investigational center to receive 1 of 2 (in C-12-028), 3 (in C-10-126) or 4 (in C-12-053) masked study drugs.
- For each study, a list of sequential subject numbers was generated by a member of the Alcon SAS programming group not involved in the conduct of the study or had any contact with study subjects or investigators. Each subject number was associated with a treatment according to a random process. Only once all study data was verified, validated and the database locked, individual subject data were unmasked.
- As a double-masked study, the patients, the Investigators, the investigational center staff, the Sponsor, and the clinical monitors were not aware of the treatment assigned to the individual study patients.
- All study drugs were identical in appearance and supplied in masked bottles with identical packaging and labeling.
- To minimize any potential Investigator bias, designated study site staff personnel administered the first dose of study medication in the subject's eyes during Visit 1 in C-12-028 and at all dosing visits for studies C-10-126 (Visits 3A, 4A and 5) and C-12-053 (Visits 3A and 4).
- All efficacy and safety variables were assessed by masked observers.
- The treatment code was not broken at any time during any of the studies by either the investigator or the Sponsor.
- Frequent on-site monitoring was performed during the conduct of the studies to ensure compliance with protocol guidelines.

# 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.