CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

210875Orig1s000

ADMINISTRATIVE and CORRESPONDENCE DOCUMENTS

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

IND 110955

MEETING MINUTES

Sunovion Pharmaceuticals Inc.
Attention: Sonya Roeloffzen
Director, Global Regulatory Affairs
88 Waterford Drive
Marlborough, MA 01752-7010

Dear Ms. Roeloffzen:

Please refer to your Investigational New Drug Application (IND) submitted under section 505(i) of the Federal Food, Drug, and Cosmetic Act for APL-130277.

We also refer to the meeting between representatives of your firm and the FDA on February6, 2018. The purpose of the meeting was to discuss the original new drug application (NDA).

A copy of the official minutes of the meeting is enclosed for your information. Please notify us of any significant differences in understanding regarding the meeting outcomes.

If you have any questions, call Jack Dan, Regulatory Project Manager at (240) 402-6940.

Sincerely,

{See appended electronic signature page}

Eric Bastings, MD
Deputy Director
Division of Neurology Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

Enclosure:
Meeting Minutes

FOOD AND DRUG ADMINISTRATION
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MEMORANDUM OF MEETING MINUTES

Meeting Type:	B
Meeting Category:	Pre-NDA
Meeting Date and Time:	February 6, 2018 from 3:00 pm to 4:00 pm
Meeting Location:	White Oak, Building 22, Room 1309
Application Number:	110955
Product Name:	APL-130277
Indication:	Acute intermittent management of OFF episodes in patients with Parkinson's disease
Sponsor/Applicant Name:	Sunovion Pharmaceuticals Inc.
Meeting Chair:	Billy Dunn, MD
Meeting Recorder:	Jack Dan, RPh

FDA ATTENDEES
Billy Dunn, MD, Director, Division of Neurology Products (DNP)
Eric Bastings, MD, Deputy Director, DNP
Nick Kozauer, MD, Associate Director, DNP
Gerald (Dave) Podskalny, DO, MPHS Clinical Team Leader, DNP
Kenneth Bergmann, MD, Clinical Reviewer, DNP
LuAnn Mckinney, PhD, Nonclinical Reviewer, DNP
Dan Berger, PhD, Chemistry Manufacturing Controls, Reviewer
Atul Bhattaram, PhD, Clinical Pharmacology Reviewer, DNP
Kun Jin, PhD, Statistical Team Leader
Junshan Qiu, PhD, Statistical Reviewer
Jack Dan, RPh, Regulatory Project Manager

SPONSOR ATTENDEES
Antony Loebel, MD, Executive Vice President, Chief Medical Officer, Head of Global Clinical Development
Bradford Navia, MD, Senior Director, Global Clinical Development
David Blum, MD, Head, Global Clinical Research Neurology
Diana Hughes, MD, MSc, Head PVRM & Head Global PV
E. Radford Decker, PhD, Senior Director DMPK
James Rawls, PharmD, Head, Global Regulatory Affairs
Jane Xu, PhD, Head, Global Data Science
Kenneth Sciarappa, PhD, Senior Director, Global Data Science, Biostatistics

Kimberley Treinen, PhD, Executive Director & Head of Preclinical
Parul Bhargava, PhD, Associate Director, Global Data Science, Biostatistics
Paul McGlynn, PhD, Executive Director, Global Project Management
Rachel Morrison, GRSC, Associate Director, Global Regulatory Affairs
Renee Carroll, MS, RAC, Senior Director, Global Regulatory Affairs
Robert Goldman, PhD, Head Global Clinical Research & Medical Affairs
Sonya Roeloffzen Stokowski, MSc, Director, Global Regulatory Affairs
Thierry Bilbault, PhD, Head, Technical Operations
(b) (4)
Yu-Yuan Chiu, PhD, Senior Director, Clinical Pharmacology

1.0 BACKGROUND

Sunovion Pharmaceuticals Inc. (Sunovion) is developing APL-130277 (apomorphine hydrochloride) sublingual film for the acute, intermittent treatment of "OFF" episodes associated with Parkinson's disease (PD)

APL-130277 is a (b) (4) film strip of apomorphine for sublingual (sl) administration which is designed to deliver apomorphine systemically through absorption from the oral cavity mucosa, thus bypassing the extensive first pass metabolism associated with gastrointestinal absorption of the compound.

APL-130277 was developed by Cynapsus Therapeutics (Cynapsus) under Investigational New Drug application (IND) 110,955. Sunovion acquired Cynapsus on October 21, 2016.

APL-130277 obtained Fast Track designation on August 25, 2016.

Sunovion will submit a 505(b)(2) NDA for APL-130277 which contains the same active ingredient in NDA 021264 Apokyn injection.

FDA sent Preliminary Comments to Sunovion Pharmaceuticals Inc. on February 1, 2018.

2. DISCUSSION

Question 1: Integrated Efficacy Analysis: Sunovion proposes to submit a Summary of Clinical Efficacy (SCE) that will also meet the statutory requirement for an Integrated Summary of Effectiveness (ISE) for the reasons provided below. Does the Division agree with this proposal?

FDA Response to Question 1:
Yes, it is possible to submit the narrative portions of the SCE summarizing APL-130277 efficacy (including all subgroup analyses) within Module 2. The texts should contain functioning hyperlinks to the information found in the appendices, tables, figures, listings, and datasets for the ISE.

All appendices must have a hyperlinked table of contents (TOC) that uses logical names that describe its contents. If an appendix contains subsections, the TOC for the appendix should contain hyperlinks or bookmarks to each subsection. Create a Master TOC that lists the order and title of each of the appendices. The Master TOC should contain functioning hyperlinks or bookmarks that bring the reader to the location of each appendix listed. The SCE needs to be clearly labeled and navigable.

Meeting Discussion:
None.

Question 2: Clinical Development: Does the Division agree that the clinical development package as described below is sufficient to support a substantive review of APL-130277 (apomorphine hydrochloride) sublingual film 505(b)(2) NDA?

FDA Response to Question 2:
The clinical pharmacology and clinical trial information appear, on face, to be sufficient to support a review of your product. However, this will be a matter of review after your complete application is submitted.

We remind you that in order to rely on FDA's finding of safety and/or effectiveness for a listed drug, you must establish that such reliance is scientifically appropriate and establish a satisfactory "bridge" between your proposed product and the listed drug to be relied upon. You propose to rely on Apokyn (NDA 21264) and to justify such reliance through a comparison of your proposed product and APO-go. The acceptability of such an approach will be a matter for review and will depend on several factors, including, as we have previously noted, your ability to assure us of the "sameness" of the current Apokyn and APO-go products. Please refer to the following guidance for further information on the requirements for establishment of effectiveness of your product: "Guidance for Industry: Providing Clinical Evidence of Effectiveness for Human Drugs and Biological Products"
https://www.fda.gov/ucm/groups/fdagov-public/@fdagov-drugs-ggen/documents/document/ucm072008.pdf

Meeting Discussion:
The Division's suggested including in the NDA the final results from Study 203, a comparative bioavailability study assessing Apokyn, Apo-go and APL-130277, because the information from the study may help with bridging Apokyn to APL-130277.

Question 3: Integrated Summary of Safety (ISS): Sunovion proposes to summarize the individual study level data from Studies CTH-203 and CTH-302 separately within the ISS given that these are ongoing studies with only a small number of subjects enrolled at the time of NDA submission and their differences in study design. Does the Division agree with this proposal?

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