

From: Thompson, Edward
Sent: Monday, June 24, 2013 7:20 PM
To: 'Jennifer Spinella (jspinella@raretx.com)'
Cc: Kennedy, Michael; Frost, Mitchell M
Subject: Information Request for BL 125488/0

Contacts: Jennifer Spinella

Dear Ms. Spinella:

We are reviewing your March 16, 2013 biologics license application (BLA) for Crotalidae (pit viper) Immune F(ab')₂ (Equine) Injection. We are providing the following comments and request for additional information to continue our review:

1. Historical data that describes the natural history (e.g., coagulopathy, bleeding, myolysis, etc.) of patients with North American crotalid envenomation and untreated with antivenin.
2. Pharmacovigilance data from the Mexican market.
3. Snake Bite Severity Scores calculated at multiple time points beyond baseline, at least through the end of maintenance, and at Days 5 and 8 if possible. Use descriptive statistics to tabulate and graph the data for all 3 Groups.
4. For all 3 Groups graph vital signs, PT, PTT and INR over time (Mean \pm SD).
5. For all 3 Groups, graph over time each individual patient whose platelet count at Baseline was < 100K and graph the composite for each Group (Mean \pm SD). Please construct one graph with the individual patients (i.e., all patients on one graph not an individual graph for each patient) and another with the composites.
6. For all 3 Groups, graph over time each individual patient whose fibrinogen at Baseline was < 100 mg/dL and graph the composite for each Group (Mean \pm SD). Please construct one graph with the individual patients (i.e., all patients on one graph not an individual graph for each patient) and another with the composites.

The review of this submission is on-going and issues may be added, expanded upon, or modified as we continue to review this submission.

Please submit your response to this information request as an amendment to this file by July 15, 2013 referencing the date of this request. If you anticipate you will not be able to respond by this date, please contact the Agency immediately so a new response date can be identified.

If we determine that your response to this information request constitutes a major amendment, we will notify you in writing.

The action due date for this file is March 18, 2014.

Please send an email message acknowledging receipt of this request.

If you have any questions, please contact me at (301) 827-9167.

Sincerely,

Edward Thompson
Regulatory Project Manager
FDA/CBER/OBRR/DBA/RPMB