

1 available therapy is also considered when deciding
2 whether an accelerated approval should be withdrawn
3 or whether there may be an alternative path to
4 verify clinical benefit.

5 While sotorasib was the first KRAS G12C
6 inhibitor to receive FDA approval, there are
7 numerous competitor drugs currently being developed
8 for non-small cell lung cancer. Adagrasib is the
9 other KRAS G12C inhibitor farthest along in drug
10 development, and it is the only other drug in class
11 that has FDA approval to date. Adagrasib was
12 granted accelerated approval in December of 2022
13 and the confirmatory randomized trial, KRYSTAL-12,
14 is ongoing. KRYSTAL-12 evaluates the same patient
15 population as CodeBreaK 200, has the same docetaxel
16 control arm, allows for crossover, and also has a
17 PFS per BICR primary endpoint. Per
18 clinicaltrials.gov, the estimated primary
19 completion date of KRYSTAL-12 is in May of 2025.

20 We note that the applicant has a planned
21 randomized trial in the first-line setting.
22 CodeBreaK 202 randomizes patients with KRAS G12C

1 scheme -- I think it's figure 2 -- which they also
2 showed in their analysis, is actually not quite
3 correct. The scan data is shared with
4 investigators, as well as the COP assessment and
5 the BICR. The investigator was never a gatekeeper,
6 per se, in order for the BICR to receive
7 information. In that regard, again, they were
8 blinded to treatment assignment at all times, and
9 there was no communication between the
10 investigators, the COP assessment, and any of the
11 BICR assessments.

12 With regard to -- I think you had a third
13 question. Can you repeat your third question that
14 was in embedded in there?

15 DR. NIEVA: Yes. I'd like to know the
16 nature -- we do blinded independent central review
17 because we presume it to be more competent or
18 informed. So the fact that the first blinded
19 independent central review seemed to have a large
20 number of errors is concerning. So I'd like to
21 know if that's something that's been acknowledged
22 by the vendor or if the vendor stands by their

1 initial assessments, and I'd like to know if there
2 was a systematic nature to the types of errors that
3 were being made.

4 DR. FRIBERG: So to clarify, the BICR
5 process and the independent imaging reads were
6 entirely independent. As I mentioned, no
7 information was sharing. Also to put it into some
8 context, less than 10 percent of the total reads
9 that were performed by the BICR went through the
10 COP process.

11 That being said, this aggregate data that
12 was identified as having some discordances through
13 the mechanisms that we described was through
14 routine and outlined in the imaging charter
15 communications with the imaging vendor. That led
16 to an independent quality review at the level of
17 the imaging vendor, and ultimately that led to them
18 independently, without regard to saying which of
19 the individual scans were involved; or without,
20 again, knowledge of the treatment assignments, that
21 led to their independent evaluation, reader
22 retraining, and ultimately the three scans that had

1 their values changed.

2 So in that regard, the auditing that the FDA
3 brings up would only have been possible through
4 this communication with Amgen that, again, was
5 without regard to treatment assignment, and the
6 global 100 percent re-reads should have nullified
7 that. So again, no imaging charter violation and
8 the re-reads should have accounted for all of this.

9 DR. MADAN: Okay. Thanks.

10 DR. SINGH: Dr. Madan, may I be permitted to
11 just respond, since it was basically said that the
12 FDA is being inaccurate? I think that we did say
13 within our presentation that this was a very
14 confusing process for us to elucidate. We called
15 it a potential violation, and we did try to gain a
16 deeper understanding. Nevertheless, we considered
17 this to be, in totality, just an atypical
18 interaction, triggering a series of re-reads, which
19 again speaks to just the global concerns regarding
20 the fidelity of this endpoint. I'll end there.

21 DR. MADAN: Thank you, Dr. Singh.

22 Dr. Shaw, you have the next question.

1 DR. SHAW: Thank you very much. Pamela
2 Shaw, Kaiser Permanente, Washington Health Research
3 Institute. I just had a couple of quick follow-up
4 questions regarding the BICR re-read process. I
5 just wanted to understand, were those completely
6 new people from that vendor or new organization
7 that were re-reading it -- so that would be the
8 first time they saw the scans -- or was it some of
9 the same people reading the same scans a second
10 time?

11 DR. FRIBERG: Thank you, Dr. Shaw. They
12 were three separate new individuals, new
13 radiologists, who were independent from anyone who
14 had ever seen a scan on the study.

15 DR. SHAW: Okay. Great. Thank you. I
16 think that completes my questions about the BICR.

17 Then I just had another second question,
18 which related to understanding some of these
19 sensitivity analyses, and we've heard the term
20 "pessimism" being used in some of those
21 imputations, where we think about those people that
22 stop treatment or the early crossovers, and we

1 heard about this imputation process where we take
2 the 58 percent, the top 50 percent, in terms of
3 best progression events in the imputations.

4 For me, what I understood -- and maybe this
5 is a question for Dr. Song, and you can tell me if
6 I'm interpreting this correctly -- is that we've
7 learned about the people, particularly, I'm going
8 to call it the doxa [ph] arm -- I don't pronounce
9 it very well -- that the early switchers had better
10 survival. I think it was a 42 percent hazard
11 ratio. And also, there was a differential better
12 survival being censored for the standard arm.

13 So the idea that this 50 percent imputation
14 is optimistic, I'm confused because the way I think
15 about it, if I'm going to impute this progression,
16 I want to think about people with a similar
17 prognosis. So I'm actually wondering, rather than
18 just taking the progression times, did you think
19 about doing an imputation, or did anyone do an
20 imputation, where you think about people with
21 similar prognosis, similar survival, and then look
22 at the progression times, the progression-free

1 survival times, amongst those who had, obviously,
2 better survival that we're getting censored on one
3 arm versus the other?

4 I don't know if that question made sense,
5 because I'm not sure if an optimistic implication
6 was done because the survival wasn't considered,
7 and it seemed like there was a survival difference
8 or at least some evidence of that.

9 DR. MADAN: Maybe I can try to distill that,
10 and you can correct me if I'm wrong, Dr. Shaw. But
11 you're asking, basically, with the statistical
12 extrapolations, were they done with patients of
13 similar characteristics so you could have a more
14 accurate imputation?

15 DR. SHAW: Yes, in terms of the prognosis,
16 because I'm concerned that this term "optimism" is
17 giving us all comfort, and I'm not sure they were
18 optimistic at all because they didn't consider one
19 of the most important characteristics of the
20 patient, which was prognosis, and somehow
21 conditionally imputing on prognosis, based on
22 survival times.

