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FOOD AND DRUG ADMINISTRATION
CENTER FOR DRUG EVALUATION AND RESEARCH

ONCOLOGIC DRUGS ADVISORY COMMITTEE MEETING
(ODAC)

Virtual Meeting

Morning Session
Friday, March 15, 2024
8:30 a.m. to 1:00 p.m.

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Meeting Roster

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14 *(Morning session only)*

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18 Office of Biostatistics and Pharmacovigilance

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P R O C E E D I N G S

(8:30 a.m.)

Call to Order

DR. MADAN: Good morning, and welcome. I would first like to remind everyone to please mute your line when you are not speaking. For media and press, the FDA press contact is Lauren-Jei McCarthy, and her e-mail is displayed currently. Thank you.

My name is Ravi Madan, and I will be chairing today's meeting. I will now call the morning session of the March 15, 2024 Oncologic Drugs Advisory Committee meeting to order. Dr. Joyce Frimpong is the acting designated federal officer for this meeting and will begin with introductions.

Introduction of Committee

DR. FRIMPONG: Good morning. My name is Joyce Frimpong, and I'm the acting designated federal officer for this meeting. When I call your name, please introduce yourself by stating your name and affiliation. We will start with the

1 standing members.

2 Dr. Advani?

3 DR. ADVANI: Ranjana Advani, Stanford.

4 DR. FRIMPONG: Thank you. Good morning.

5 Dr. Gradishar?

6 DR. GRADISHAR: Bill Gradishar, medical
7 oncology, Northwestern University.

8 DR. FRIMPONG: Thank you.

9 Dr. Lieu?

10 DR. LIEU: Good morning, everybody. I'm
11 Chris Lieu. I'm a GI medical oncologist from the
12 University of Colorado Cancer Center.

13 DR. FRIMPONG: Thank you.

14 Our chairperson, Dr. Madan.

15 DR. MADAN: Good morning. Ravi Madan,
16 medical oncologist, National Cancer Institute.

17 DR. FRIMPONG: Thank you.

18 Dr. Nieva?

19 DR. NIEVA: Good morning. Jorge Nieva,
20 thoracic medical oncologist, University of Southern
21 California, Norris Comprehensive Cancer Center.

22 DR. FRIMPONG: Thank you.

1 Dr. Spratt?

2 DR. SPRATT: Dr. Dan Spratt, Chair of
3 Radiation Oncology at University Hospitals Seidman
4 Cancer Center and Case Western Reserve University.

5 DR. FRIMPONG: Thank you.

6 Dr. Vasan?

7 DR. VASAN: Neil Vasan. I'm a breast
8 medical oncologist at Columbia University Medical
9 Center.

10 DR. FRIMPONG: Thank you.

11 And for our industry representative,
12 Dr. Frenkl?

13 DR. FRENKL: Good morning. I'm Dr. Tara
14 Frenkl, Head of Oncology Development at Bayer
15 Pharmaceuticals.

16 DR. FRIMPONG: And now for our temporary
17 voting members, Dr. Deflice?

18 DR. DEFLICE: Hello. I'm John Deflice. I'm
19 a gastroenterologist and I have a 13-year history
20 of multiple myeloma. I'm a patient advocate.

21 DR. FRIMPONG: Thank you.

22 Dr. Hunsberger?

1 DR. HUNSBERGER: Good morning. I'm Sally
2 Hunsberger. I'm a biostatistician at NIH NIAID.
3 Thank you.

4 DR. FRIMPONG: Dr. Kwok?

5 DR. KWOK: I am Mary Kwok. I am a multiple
6 myeloma physician at the University of Washington
7 and Fred Hutch Cancer Center.

8 DR. FRIMPONG: And for our consumer
9 representative, Ms. Lattimore?

10 MS. LATTIMORE: Good morning. I'm Susan
11 Lattimore from Oregon Health & Science University
12 in Portland.

13 DR. FRIMPONG: And now I will do our FDA
14 participants. I would first start with
15 Dr. Theoret.

16 DR. THEORET: Yes. Hi. Good morning. My
17 name is Mark Theoret. I'm a hematologist/
18 oncologist and Deputy Center Director of the
19 Oncology Center of Excellence.

20 DR. FRIMPONG: Dr. Kanapuru?

21 DR. KANAPURU: Hi. Good morning. I'm Bindu
22 Kanapuru. I'm a hematologist/oncologist and the

1 medical oncology review team lead.

2 DR. FRIMPONG: Dr. Sokolic?

3 DR. SOKOLIC: Hi. Rob Sokolic. I'm the
4 Branch Chief for Hematologic Malignancy in CBER.

5 DR. FRIMPONG: Dr. Peredo-Pinto?

6 DR. PEDERO-PINTO: Good morning. I'm
7 Dr. Helkha Pedereo-Pinto, a pediatric hematologist/
8 oncologist in the Division of Clinical Hematology
9 Evaluation in CBER and the primary clinical
10 reviewer for this product. Thank you.

11 DR. FRIMPONG: And Dr. Wang?

12 DR. WANG: Good morning, everyone. I'm Cong
13 Wang, biostatistical reviewer for the Carvykti
14 application. I'm from the Division of
15 Biostatistics, CBER, FDA.

16 DR. FRIMPONG: Thank you, everyone.

17 Dr. Madan, I'll hand it back over to you.

18 DR. MADAN: Thank you, Dr. Frimpong.

19 For topics such as those being discussed at
20 this meeting, there are often a variety of
21 opinions, some of which are strongly held. Our
22 goal is that this meeting will have a fair and open

1 forum to discuss these issues and that individuals
2 can express their views without interruption.
3 Thus, a gentle reminder, individuals will be
4 allowed to speak into the record only if recognized
5 by the chairperson. We look forward to this
6 meeting.

7 In the spirit of the Federal Advisory
8 Committee Act and the Government in the Sunshine
9 Act, we ask that the advisory committee members
10 take care that their conversations about the topic
11 at hand take place in the open forum of the
12 meeting. We are aware that members of the media
13 are anxious to speak with the FDA about these
14 proceedings; however, FDA will refrain from
15 discussing the details of this meeting with the
16 media until its conclusion. Also, the committee is
17 reminded to please refrain from discussing the
18 meeting topic during breaks or lunch. Thank you.

19 Dr. Frimpong will read the Conflict of
20 Interest Statement for the meeting.

21 **Conflict of Interest Statement**

22 DR. FRIMPONG: Thank you, Dr. Madan.

1 The Food and Drug Administration is
2 convening today's meeting of the Oncologic Drugs
3 Advisory Committee under the authority of the
4 Federal Advisory Committee Act of 1972. With the
5 exception of the industry representative, all
6 members and temporary voting members of the
7 committee are special government employees or
8 regular federal employees from other agencies and
9 are subject to federal conflict of interest laws
10 and regulations.

11 The following information on the status of
12 this committee's compliance with federal ethics and
13 conflict of interest laws, covered by but not
14 limited to those found at 18 U.S.C. Section 208, is
15 being provided to participants in today's meeting
16 and to the public.

17 FDA has determined that members and
18 temporary voting members of this committee are in
19 compliance with federal ethics and conflict of
20 interest laws. Under 18 U.S.C. Section 208,
21 Congress has authorized FDA to grant waivers to
22 special government employees and regular federal

1 employees who have potential financial conflicts
2 when it is determined that the agency's need for a
3 special government employee's services outweighs
4 their potential financial conflicts of interest, or
5 when the interest of a regular federal employee is
6 not so substantial as to be deemed likely to affect
7 the integrity of the services which the government
8 may expect from the employee.

9 Related to the discussion of today's
10 meeting, members and temporary voting members of
11 this committee have been screened for potential
12 financial conflicts of interests of their own as
13 well as those imputed to them, including those of
14 their spouses or minor children and, for purposes
15 of 18 U.S.C. Section 208, their employers. These
16 interests may include investments; consulting;
17 expert witness testimony; contracts, grants,
18 CRADAs; teaching, speaking, writing; patents and
19 royalties; and primary employment.

20 Today's agenda involves a discussion of
21 supplemental biologics license application, sBLA,
22 125746.74 for Carvykti, ciltacabtagene autoleucel,

1 suspension for intravenous infusion, submitted by
2 Janssen Biotech, Incorporated. The proposed
3 indication for this product is for the treatment of
4 adult patients with relapsed or refractory multiple
5 myeloma who have received at least one prior line
6 of therapy, including a proteasome inhibitor and an
7 immunomodulatory agent, and are refractory to
8 lenalidomide.

9 The committee will have a general discussion
10 focused on the overall survival data in the
11 Study MMY3002, CARTITUDE-4, and the risk and
12 benefit of ciltacabtagene autoleucel in the
13 intended population. This is a particular matters
14 meeting during which specific matters related to
15 Janssen Biotech's sBLA will be discussed.

16 Based on the agenda for today's meeting and
17 all financial interests reported by the committee
18 members and temporary voting numbers, a conflict of
19 interest waiver has been issued in accordance with
20 18 U.S.C. Section 208(b)(3) to Dr. Mary Kwok.
21 Dr. Kwok's waiver involves a consulting interest
22 under negotiation with a competing firm. The

1 waiver also involves 10 of the employer's research
2 contracts for various studies funded by the party
3 to the matter or competing firm. Dr. Kwok's
4 employer receives between \$0 and \$50,000 per year
5 for each of the four studies from Janssen, Seagen,
6 Celgene, and a competing firm; between \$50,000 and
7 \$100,000 per patient enrolled for one study from
8 Regeneron Pharmaceuticals; between \$100,000 and
9 \$300,000 per year for each of the two total studies
10 from Janssen and Sanofi; between \$100,000 and
11 \$300,000 per enrolled patients for each of the two
12 total studies from Janssen Research & Development
13 and TeneoOne and AbbVie; and \$300,000 and \$500,000
14 per year for one study from Harpoon Therapeutics.

15 The waiver allows this individual to
16 participate fully in today's deliberations. FDA's
17 reason for issuing the waiver are described in the
18 waiver document, which is posted on the FDA's
19 website on the advisory committee meeting page,
20 which can be found at www.fda.gov and by searching
21 on March 15, 2024 ODAC. Copies of the waiver may
22 also be obtained by submitting a written request to

1 the agency's Freedom of Information Division,
2 5630 Fishers Lane, Room 1035, Rockville, Maryland,
3 20857, or requests may be sent via fax to
4 301-827-9267.

5 To ensure transparency, we encourage all
6 standing committee members and temporary voting
7 members to disclose any public statements they have
8 made concerning the product at issue. With respect
9 to the FDA's invited industry representative, we
10 would like to disclose that Dr. Tara Frenkl is
11 participating in this meeting as a non-voting
12 industry representative, acting on behalf of
13 regulated industry. Dr. Frenkl's role at this
14 meeting is to represent industry in general and not
15 any particular company. Dr. Frenkl is employed by
16 Bayer Pharmaceuticals.

17 For the record, Dr. Sham Mailankody, an
18 employee of Memorial Sloan Kettering Cancer Center,
19 has acknowledged having contracts for grants from
20 Bristol-Myers Squibb and being a principal
21 investigator or co-investigator on studies with
22 Janssen Oncology; Takeda Oncology; Bristol-Myers

1 Squibb; Allogene Therapeutics; BAIT Therapeutics;
2 and Caribou Therapeutics. Dr. Mailankody has also
3 acknowledged receiving consulting fees from Janssen
4 Oncology; Bristol-Myers Squibb; Arcellx; AbbVie;
5 Optimum Oncology; and Sanofi-Aventis. As a guest
6 speaker, Dr. Mailankody will not participate in
7 committee deliberations, nor will he vote.

8 We would like to remind members and
9 temporary voting members that if the discussions
10 involve any other products or firms not already on
11 the agenda for which an FDA participant has a
12 personal or imputed financial interest, the
13 participants need to exclude themselves from such
14 involvement, and their exclusion will be noted for
15 the record. FDA encourages all other participants
16 to advise the committee of any financial
17 relationships that they may have with the firm at
18 issue. Thank you.

19 Dr. Madan, I'll hand it back to you.

20 DR. MADAN: Thank you, Dr. Frimpong.

21 We will now proceed with the FDA
22 introductory remarks from Dr. Robert Sokolic.

1 **FDA Opening Remarks - Robert Sokolic**

2 DR. SOKOLIC: Good morning. My name is Rob
3 Sokolic. I'm the chief of the malignant hematology
4 branch in the Office of Clinical Evaluation at
5 CBER. I'm going to briefly introduce the purpose
6 of this convening of the Oncology Drug Advisory
7 Committee meeting.

8 During this meeting, we'll be discussing the
9 clinical development program for ciltacabtagene
10 autoleucel, also known as cilta-cel, and Carvykti
11 for the treatment of relapsed multiple myeloma.
12 cilta-cel is an autologous T-cell immunotherapy for
13 the treatment of multiple myeloma. Cells are
14 engineered to express a chimeric antigen receptor
15 directed against BCMA, a protein expressed by
16 benign and malignant plasma cells. Cilta-cel is
17 currently approved for the treatment of adults with
18 relapsed or refractory multiple myeloma after four
19 or more prior lines of therapy, including a
20 proteasome inhibitor, an immunomodulatory agent,
21 and then an anti-CD38 monoclonal antibody.

22 The applicant, Janssen, submitted a

1 supplemental biologics license application, or BLA,
2 seeking expansion of the cilta-cel indication to
3 read, "Carvykti is a B-cell maturation antigen
4 directed, genetically modified, autologous T-cell
5 immunotherapy, indicated for the treatment of adult
6 patients with relapsed or refractory multiple
7 myeloma, who have received at least one prior line
8 of therapy, including a proteasome inhibitor and an
9 immunomodulatory agent, and who are refractory to
10 lenalidomide."

11 So during my brief remarks, I'll describe
12 the meeting purpose, provide an overview of the
13 trial, whose results provide the basis for the
14 applicant's request for approval, and conclude with
15 questions for which we're asking the committee's
16 discussion.

17 The applicant submitted the results of the
18 CARTITUDE-4 trial to provide the evidence of safety
19 and effectiveness of cilta-cel for the proposed
20 indication. CARTITUDE-4 demonstrated improvement
21 in progression-free survival in patients randomized
22 to cilta-cel compared to patients randomized to

1 standard of care treatment. During the review of
2 the application, FDA identified the higher rate of
3 early deaths in the cilta-cel arm compared to the
4 standard therapy arm as a major review issue.
5 Specifically, visual inspection of the Kaplan-Meier
6 curves for overall survival indicates a crossing
7 hazards pattern with an early decrement in overall
8 survival through the first 10 months. As you'll
9 hear from my colleagues in the subsequent FDA
10 presentations, the crossing hazards pattern renders
11 the average hazard ratio uninterpretable.

12 We ask the members of the committee to
13 discuss and provide input on the adequacy of the
14 data from the CARTITUDE-4 trial to demonstrate the
15 safety and effectiveness of cilta-cel for the
16 proposed indication, taking into account the
17 effects on progression-free survival and the
18 increased rate of early deaths observed in the
19 cilta-cel arm.

20 I'll now briefly review the CARTITUDE-4
21 trial. CARTITUDE-4 is an ongoing, open-label,
22 randomized, phase 3 clinical trial. A total of

1 419 participants with relapsed or refractory
2 multiple myeloma who are refractory to lenalidomide
3 were randomized to either a single infusion of
4 cilta-cel after lymphapheresis, bespoke product
5 manufacturing, and lymphodepleting chemotherapy, or
6 to standard of care immunochemotherapy until
7 progression or intolerance. Treatment response is
8 assessed in CARTITUDE-4 using the 2016 IMWG
9 criteria.

10 Shown here is the Kaplan-Meier plot for
11 progression-free survival for the
12 intention-to-treat population at the first interim
13 analysis. CARTITUDE-4 demonstrated a statistically
14 significant effect on progression-free survival
15 with a hazard ratio of 0.41, indicating a
16 59 percent decrease in hazard rate of progression
17 for patients randomized to cilta-cel compared to
18 patients randomized to the standard of care. The
19 median progression-free survival was not reached in
20 the cilta-cel arm and was 12 months in the standard
21 of care arm.

22 CARTITUDE-4 demonstrated a numerically

1 increased overall survival in the cilta-cel arm,
2 although the crossing hazards pattern makes the
3 hazard ratio uninterpretable. The median overall
4 survival was not reached in the cilta-cel arm and
5 was 26.7 months for the standard of care arm. My
6 colleague, Dr. Peredo-Pinto, will review these data
7 in greater detail in the body of the presentation.

8 I'll now present the questions for the
9 committee. The review issues are that
10 ciltacabtagene autoleucel led to a significantly
11 improved rate of progression-free survival, but
12 with a decrement in overall survival in the first
13 10 months of the trial. The decrement in overall
14 survival calls into question whether the
15 risk-benefit assessment is favorable. We ask the
16 members of committee to discuss whether the
17 observed increased risk of early deaths in the
18 cilta-cel arm of CARTITUDE-4 is offset by the
19 statistically significant improvement in
20 progression-free survival.

21 Shown here is the voting question, which I
22 will read. Is the risk-benefit assessment for

1 ciltacabtagene autoleucel, for the proposed
2 indication, favorable?

3 Thank you for your attention. I'll now
4 invite FDA's guest speaker, Dr. Sham Mailankody,
5 the Clinical Director of the Cellular Therapy
6 Service at Memorial Sloan Kettering Cancer Center,
7 who will provide an overview of current management
8 of multiple myeloma.

9 DR. MADAN: Thank you, Dr. Sokolic.

10 We'll now proceed with our guest speaker
11 presentation from Dr. Sham Mailankody.

12 **Guest Speaker Presentation - Sham Mailankody**

13 DR. MAILANKODY: Thank you.

14 I'm going to try to summarize the current
15 management of multiple myeloma in the next 20 or so
16 minutes. These are my disclosures.

17 To begin with, incidence and prevalence of
18 multiple myeloma, as many of you may know, this is
19 the second most common blood cancer amongst adults
20 in the U.S. There is probably about
21 35,000 patients being diagnosed with multiple
22 myeloma every year, and the prevalence or the

1 number of patients living with this disease is
2 almost 160,000. Myeloma represents about
3 1.8 percent of all new cancer cases in the United
4 States, and it's primarily seen in older adults.
5 The median age is 69 years.

6 We stage myeloma using either the
7 revised ISS staging or the R2-ISS staging, and as
8 shown here, there are 1 to 3 or 1 to 4 different
9 stages. We don't necessarily change treatments
10 based on staging, at least currently, but suffice
11 it to say that higher stages generally are
12 associated with less optimal outcomes. The other
13 point to note is these staging systems incorporate
14 a cytogenetic risk factor, so about 25 percent of
15 our patients have one or more high-risk cytogenetic
16 factors, which again is associated with somewhat
17 less optimal outcomes. Most trials that we will
18 discuss and we have reported so far report the
19 R-ISS staging, although the R2-ISS is a further
20 refinement of this R-ISS staging.

21 This is one of several examples of
22 population-based studies that have shown a

1 consistent improvement in survival for patients
2 with multiple myeloma over the last 30 or so years,
3 and this improvement has been seen across age
4 groups. It includes patients younger than 65,
5 65 to 74, as well as 75-plus years, and this data
6 only goes up to 2012, after which we've had many
7 more new treatments become available. So it's
8 expected that patients diagnosed with multiple
9 myeloma in 2023 will have an average life
10 expectancy of 10 or more years, and this is largely
11 driven by new drug development.

12 Over the last 25 or so years, we have had
13 multiple classes of treatments become available for
14 our patients, starting with immunomodulatory drugs
15 and proteasome inhibitors in the 2000s, and then
16 monoclonal antibodies targeting CD38 and SLAMF7,
17 and then in the last five or so years, the
18 introduction of T-cell redirecting therapies. This
19 is not an all inclusive but a pretty comprehensive
20 list of treatments we have available for myeloma.
21 The three major classes we have are listed in the
22 top here -- proteasome inhibitors, immunomodulatory

1 drugs, CD38 antibodies -- and then the last seven
2 or so years, we've had the development of T-cell
3 redirecting therapies. Those are CAR T cells or
4 bispecific antibodies. On the bottom right listed
5 here are the five currently approved products.

6 Starting with newly diagnosed myeloma, when
7 the patient is diagnosed with myeloma for the very
8 first time, the first determination that happens
9 after initial screening and testing is to determine
10 whether a patient is transplant eligible or
11 ineligible, and this is based on several factors
12 including age, comorbidities, general organ
13 function, and other clinical factors. So patients
14 who are transplant eligible are typically treated
15 with induction therapy, followed by consolidation,
16 which is typically autologous stem-cell transplant,
17 and this is then followed by maintenance treatment.

18 For patients who are transplant ineligible,
19 they receive initial therapy with a combination of
20 drugs, followed by maintenance. As is standard for
21 most of oncology, supportive care is given
22 throughout the course of these treatments, and

1 eventually when patients relapse, they go on to
2 receiving treatments for their relapse disease.

3 Starting with management of newly diagnosed
4 multiple myeloma, this is a busy slide by intent
5 because we have a lot of data here, but listed here
6 are probably six of the major clinical trials that
7 inform our current practice of managing patients
8 with multiple myeloma. As shown here, most of
9 these treatments are looking at either combinations
10 of 3-drug induction compared to 2 drugs or 4 drugs
11 compared to 3 drugs; and one example, endurance in
12 the middle, looking at a 3-drug versus 3-drug
13 comparison.

14 The second point to note is some of these
15 studies were for patients who were transplant
16 eligible, some for transplant ineligible patients,
17 and two studies where transplant was not intended
18 but was feasible to do in the studies. Then
19 looking at response rates and complete response
20 rates, I won't go through each of these columns
21 individually, but suffice it to say three drugs
22 typically get better responses than two, and four

1 drugs provide better responses than three. And for
2 the one 3 to 3 drug comparison, the response rates
3 were quite similar.

4 The next two rows look at PFS and OS, median
5 PFS and median OS, and red highlights statistically
6 significant results, and blue are those that have
7 not yet met statistical significance. And again,
8 as shown here, every time a 3 drug is compared to
9 2 drugs or a 4 drug is compared to 3 drugs, the
10 progression-free survival is improved statistically
11 significantly, and in some of these studies we're
12 also seeing overall survival benefit.

13 So in general, it's believed that 3 drugs
14 are generally superior to 2 drugs, and with the
15 extreme right two columns, increasingly emerging
16 data for induction therapy with 4 drugs. And when
17 you use 4 drugs as part of induction, you're using
18 a proteasome inhibitor, an immunomodulatory drug,
19 and a CD38 antibody, all as part of the initial
20 induction treatment.

21 So as mentioned, for patients who are
22 transplant eligible, there's a consideration of

1 doing a consolidated autologous transplant after
2 initial induction, and there are currently two
3 major clinical trials that inform the practice of
4 transplant, and both studies looked at the use of
5 autologous transplant in the early or upfront
6 setting or deferred, i.e., at the time of relapse.
7 The first study is IFM-2009. This is from the
8 French myeloma group, and the second study is from
9 the DETERMINATION study done here in the United
10 States. In both studies, patients received
11 induction therapy with the standard 3-drug
12 induction of bortezomib, lenalidomide, and
13 dexamethasone, and thereafter, patients were
14 randomized to receive either transplant in the
15 early setting or transplant that was deferred.

16 Regardless of the transplant status, all
17 patients received lenalidomide maintenance for
18 2 years in the IFM study and indefinitely in the
19 DETERMINATION study. As shown here, both studies
20 showed a pretty significant improvement in the
21 median progression-free survival; however, with
22 8 years of follow for the IFM study and almost

1 5 years for the DETERMINATION study, there was no
2 difference in overall survival. In summary, it's
3 clear with modern induction therapies that the
4 autologous transplant continues to improve
5 progression-free survival, but not quite yet any
6 difference in overall survival in either of these
7 two studies.

8 To the bottom panel are the four relevant
9 studies for maintenance treatment. So again,
10 regardless of whether patients get consolidation or
11 not, most patients then move on to maintenance.
12 The only approved treatment for maintenance
13 currently in the United States is lenalidomide, and
14 that is based on these four large clinical trials,
15 and each of these studies showed a significant
16 improvement in the median progression-free survival
17 with the use of lenalidomide as maintenance
18 compared to placebo, and one of the studies has
19 also shown an overall survival benefit.

20 This is the U.S. study CALGB100104, but also
21 a meta-analysis of all these four studies has shown
22 an improvement in overall survival, suggesting

1 again that lenalidomide maintenance with or without
2 consolidation is the the default standard of care
3 for patients with newly diagnosed multiple myeloma.

4 So to summarize this section, standard
5 induction therapy for patients with multiple
6 myeloma is either a combination of three or
7 increasingly four drugs, and when you use four
8 drugs, all three major classes of our treatments
9 are incorporated, proteasome inhibitors,
10 immunomodulatory drugs, and CD38 antibodies. The
11 role of autologous transplantation as consolidation
12 is evolving. This is based on data that PFS is
13 improved but similar OS, and therefore
14 increasingly, fewer transplant-eligible patients,
15 especially here in the U.S., are receiving upfront
16 autologous transplantation, although it remains an
17 important treatment consideration.

18 Maintenance, particularly with lenalidomide,
19 remains the current standard of care. It has
20 consistently improved progression-free survival in
21 multiple, larger randomized studies, and
22 meta-analysis also shows an improvement in overall

1 survival. Although the number is evolving, I think
2 it's fair to say that median progression-free
3 survival, based on all of these clinical trials and
4 some of the real-world data, for patients receiving
5 first-line therapy is currently estimated to be
6 about 4 to 7 years.

7 So I come back to the slide to say that
8 these are the same 18 or so drugs we have that we
9 can use for patients with relapsed myeloma, and
10 when patients relapse, there are a plethora of
11 choices you have in front of you because of
12 different combinations of these 18 drugs that you
13 can use. I've listed, I think, 42 different
14 choices here, but there may be others as well.

15 One thing to note here is there's a lot of
16 overlap between these regimens. As you can see,
17 all the alphabets are kind of overlapping, and
18 therefore, while there are 42 choices, most
19 patients have been exposed to some of these
20 treatments or classes of these treatments
21 previously, and there's a significant amount of
22 cross resistance across the different classes of

1 drugs and agents used, such that subsequent lines
2 of therapies generally become more and more
3 challenging.

4 So how do we use these 42 regimens, or more
5 than 42 regimens, for the patient sitting in front
6 of us? I guess we use different factors. For
7 instance, what's the nature of relapse? Is it
8 symptomatic, asymptomatic? How aggressive is the
9 patient's relapse? Should we be using high-dose
10 chemotherapy to control aggressive relapse?

11 We also look at side effect profiles for
12 these drugs, as well as patients' own history of
13 side effects. Peripheral neuropathy, for instance,
14 may steer us towards using some drugs versus
15 others; cardiac dysfunction, renal dysfunction,
16 cytopenias, immune function, all of these play into
17 our choices of which regimens to use. Patient
18 factors like frailty; how far does the patient live
19 from the treatment center; does the patient prefer
20 an oral drug compared to infusions; eligibility for
21 clinical trial participation, those are also
22 factors.

1 And finally, mechanism of action, has the
2 patient received the same treatment previously or a
3 different drug from the same class? What was the
4 response to that treatment previously? Could we
5 use an alternate mechanism of action? And
6 refractoriness or exposure to a class of drug are
7 all factors we use to determine what treatments to
8 use in the relapsed/refractory setting.

9 Again, when we have patients who have
10 relapsed myeloma, we generally think of patients as
11 being either lenalidomide refractory or not
12 refractory, and listed here are the key clinical
13 trials that inform the management of patients who
14 are not lenalidomide refractory.

15 I'll note that as more and more patients
16 receive lenalidomide maintenance in the initial
17 setting, we increasingly have patients who are
18 lenalidomide refractory at the time of relapse, but
19 in the rare instances that a patient is not
20 lenalidomide refractory, one of these four clinical
21 trials using the lenalidomide backbone may inform
22 the practice of what to do next.

1 Each of these trials look as a combination
2 of 3 drugs compared to 2 drugs, and in every
3 instance, the progression-free survival is better
4 for the 3 drugs compared to 2 drugs. And in most
5 of these cases, as shown here, the overall survival
6 has also improved with the 3-drug combination
7 compared to 2 drugs; so in general, 3-drug
8 combinations are better than 2 drugs, both for PFS
9 and OS in this setting.

10 If you have patients who are lenalidomide
11 refractory, which increasingly is the more common
12 scenario when patients relapse, there are several
13 clinical trials that inform. Again, most of these
14 studies are looking at a 3-drug combination
15 compared to 2 drugs. I've listed here the
16 different treatment regimens, and these trials are
17 largely for patients with either 1 to 3 or more
18 than 2 lines of treatment. And in every case,
19 3 drugs provide better responses and better
20 complete responses compared to 2 drugs; and in
21 every case, the 3-drug regimen has a better
22 progression-free survival compared to 2 drugs.

1 In a couple of instances, we also have
2 overall survival benefit to the 3 drugs versus
3 2 drugs, and in some other instances, either the
4 data is not mature enough or have not demonstrated
5 an overall survival benefit, highlighting some of
6 the challenges of multiple subsequent lines of
7 treatment and other challenges with long-term
8 follow-up for overall survival in these clinical
9 trials.

10 So one final thought about relapsed/
11 refractory myeloma in this setting is attrition
12 through lines of therapy, and we do have several
13 choices for treatment; however, not every patient
14 who gets diagnosed with multiple myeloma receives
15 3rd, 4th, or 5th lines of therapy. This is one
16 example from a U.S. claims-based data set that was
17 published by Dr. Fonseca and colleagues a few years
18 back, looking at non-transplant patients who
19 received first-line treatment. Only about
20 8 percent of those patients received a 5th line of
21 treatment, although we have several treatments now
22 approved for 5th line, and for transplant patients,

1 that number is about 22 percent.

2 The study tries to look into what might be
3 some of the reasons for attrition, and that's
4 harder to do with insurance claims data, but one of
5 the reasons is, unfortunately, death. But that's
6 not actually the most common reason for attrition
7 across lines. Some of the purported reasons could
8 be the patients drop off, or have side effects, or
9 can't access treatments, and other reasons for
10 drop off. This is data from a U.S. claims
11 database, but similar data has been reported from
12 Europe and Australia as well, suggesting that a
13 fair amount of patients who get newly diagnosed
14 myeloma do not receive 3rd, 4th, or 5th lines of
15 treatment despite multiple approvals and choices
16 available.

17 So what about triple-class exposed patients,
18 patients who have already been exposed to or
19 refractory to one proteasome inhibitor, one
20 immunomodulatory drug, and one CD38 antibody? We
21 don't have a lot of perspective randomized data in
22 this setting, but two observational data

1 sets -- again one international and one here in the
2 U.S., the MAMMOTH here from a US-based
3 observational study, and LocoMMotion more
4 international -- both of them show that with
5 conventional treatments, less than 30 percent of
6 patients respond to next line of treatment if
7 they're already triple-class exposed. The median
8 progression-free survival in this setting is under
9 6 months and median survival is somewhere between
10 9 to 12 months.

11 I highlight, again, that these are both
12 observational data sets and we don't currently have
13 a lot of prospective long-term data for
14 triple-class exposed patients; however, whatever
15 limited data we have available would suggest a
16 response rate with conventional treatments of
17 around 30 percent and a median PFS of less than
18 6 months.

19 So that's before we had T-cell redirecting
20 therapies, and CAR T cells are on the left here and
21 bispecific antibodies. CAR T cells are autologous,
22 gene engineered T cells that target tumor-specific

1 antigens. Bispecific antibodies on the other hand
2 are off-the-shelf drugs that target, on the one
3 hand, a tumor-specific antigen, and on the other
4 side, binds to CD3, which is present on T cells,
5 and redirects these T cells towards the tumor
6 cells.

7 We have now five different T-cell
8 redirecting therapies, immune therapies, that are
9 approved for patients with four or more prior lines
10 of treatment. Each of these treatments have been
11 approved based on single-arm, pivotal studies, so
12 not randomized comparisons. None of these
13 treatments have been compared head to head so far,
14 and each of these treatments, like I said, are
15 approved for patients with very advanced multiple
16 myeloma, and in these studies, a median of
17 5 to 6 prior lines of treatments, but showing a
18 very high response rate, in the order of 60 to
19 95-98 percent for each of these products, and
20 complete response rates in the order of 30 to 83
21 percent. The median progression-free survival,
22 again, in this non-randomized, single-arm study is

1 between 8 months, 8 and a half months, to
2 35 months.

3 In terms of safety, while these treatments
4 have high efficacy, they also come with toxicity
5 concerns, for instance, cytokine release syndrome,
6 and neurologic symptoms are class effects for these
7 drugs. Shown here are the rates of CRS and ICANS,
8 and immune compromised and infections are another
9 particularly challenging side effect with many of
10 these treatments.

11 So for holding in on some of these side
12 effects, which will be discussed later today at the
13 meeting as well I'm sure, number one, is cytokine
14 release syndrome or CRS. This has been reported
15 with most T-cell directed therapies, and not only
16 in myeloma but across disease settings and across
17 treatment modalities, and the key symptoms include
18 fever, hypoxia, and hypotension. Any grade CRS, as
19 shown in the previous slide, is 70 to 95 percent of
20 patients; grade 3 or higher, though, is less than
21 5 percent with each of these products. Our
22 management of CRS has improved dramatically in the

1 last 10 or so years with the use of IL-6 blocking
2 drugs like tocilizumab and steroids like
3 dexamethasone, and there are some patients with
4 each of these products that develop a more severe
5 form of inflammation called hemophagocytic
6 syndromes as well.

7 On the right are features of immune effector
8 cell-associated neurologic toxicities or ICANS.
9 Again, symptoms here include lethargy, confusion,
10 somnolence, seizures, and any grade ICANS is 20 to
11 25 percent, and grade 3 or higher, less than
12 5 percent. Treatments here include steroids or
13 anakinra. There are some patients with these
14 products that also develop a distinct neurologic
15 syndrome that's somewhat delayed by weeks to months
16 and presents in the form of either Parkinson's like
17 features or cranial neuropathies, and doesn't fit
18 into the classical ICANS definition or timeline.

19 Then looking at, I guess, really, logistics
20 of CAR T cells, it is a pretty unique treatment in
21 that it's customized and it's individualized, so
22 there are multiple steps involved in providing

1 these treatments to patients, and bottlenecks also
2 that are associated with these steps. There's
3 initial screening when we see the patient to
4 determine whether they're eligible, and then we
5 have to find a slot available for them to collect
6 their T cells. We also have to work with logistics
7 like donor room, catheter placement, treatment
8 washouts, and all of these may take 2 to 4 weeks.

9 After all of this, we apherese or collect
10 their T cells. This is a single-day process and
11 takes about 3 to 4 hours. Once the collection is
12 done, many patients, especially in the advanced
13 setting where patients have had four or more lines
14 of treatment, need bridging therapy because they're
15 rapidly progressing. The challenge here is we have
16 very limited bridging options in this setting
17 because many of these patients have already been
18 exposed to most available treatments, and the
19 choices for bridging that we have have low
20 responses and typically high toxicities, which
21 becomes a challenge.

22 Then we have to consider treatment washout

1 before CAR T cell infusion, so the current time
2 from the apheresis, to bridging, to CAR T infusion
3 can be 4 to 8 weeks. So all in all, from the time
4 when we see the patient to them actually getting
5 the CAR T cell can be upwards of 8 to 12 weeks in
6 the current scenario for the currently approved
7 CAR T cells. And when you give CAR T cells to
8 patients with high burden of disease, as often
9 happens with advanced multiple myeloma, we also
10 recognize that there's higher incidence of
11 toxicities with refractory disease and high burden
12 of disease.

13 So these are all some of the challenges
14 we're facing with the currently approved
15 indications for CAR T cells, and some of that may
16 steer us towards using bispecific antibodies due to
17 ease of access and ready availability of these
18 treatments in the advanced setting.

19 There are other challenges as well to both
20 these treatments, the need for specialized centers;
21 inpatient management and the management of
22 toxicities; availability as I mentioned for CAR T

1 cells; the turnaround time; the efficacy is high
2 but so is cost, and the access is limited; and then
3 finally, bridging therapy, which is particularly,
4 as indicated previously, needed for CAR T cells but
5 obviously not needed for bispecific antibodies.

6 So to summarize the section on relapsed/
7 refractory myeloma, we have multiple available
8 options but significant overlap in mechanisms.
9 Cross resistance and attrition through lines of
10 therapy limits choices. Triple-class exposed
11 patients remain a particular challenge and whether
12 we have limited data for long-term survival.
13 T-cell redirecting therapies in the form of CAR T
14 cells or bispecific antibodies have high responses
15 in this setting, and to date, I guess until
16 recently, had limited long-term and randomized data
17 for safety and survival.

18 To summarize the entire talk, I would say
19 we've made substantial progress in the treatment of
20 multiple myeloma. By some counts, we have
21 19 different FDA-approved treatments for myeloma
22 and most of these treatments became available in

1 the last two decades. This has directly led to
2 consistent improvements in survival, both in our
3 clinical trials as well as population-based
4 studies, but despite these improvements, it's
5 somewhat sobering to say that most patients who
6 have a diagnosis of multiple myeloma will die from
7 the diagnosis. Thank you very much.

8 **Clarifying Questions to Guest Speaker**

9 DR. MADAN: Thank you, Dr. Mailankody.

10 We will now take clarifying questions for
11 our guest speaker, Dr. Mailankody. Please use the
12 raise-hand icon to indicate that you have a
13 question and remember to lower your hand by
14 clicking the raise-hand icon after you have asked
15 your question. When acknowledged by the chair,
16 please remember to state your name for the record
17 before you speak and direct your question to
18 Dr. Mailankody. I guess you'd be the speaker here.

19 If you wish for a specific slide to be
20 displayed, please let us know the slide number, if
21 possible. Finally, it would be helpful to
22 acknowledge the end of your question with a thank

1 you or, "That's the end of my question for now," so
2 we can move on to the next member.

3 I don't know if we have any questions for
4 Dr. Mailankody, but now would be an opportunity.

5 Dr. Vasan?

6 DR. VASAN: Hi. That was a really
7 elucidating presentation. Thank you. I had a
8 question. I'm a solid tumor oncologist, and one
9 thing we think a lot about is disease-free
10 intervals in solid tumor oncology, and there are
11 many studies that correlate disease-free intervals,
12 especially in long indolent diseases like myeloma
13 or ER positive breast cancer, with improved or
14 decreased responses to subsequent therapies.

15 I was wondering if any of the therapies -- I
16 know you presented so many different regimens, but
17 if that theme is manifest in in myeloma.

18 DR. MAILANKODY: Thank you, Dr. Vasan. I
19 would say that our management of multiple myeloma
20 involves some form of treatment -- at least the
21 current management. All of the treatments involve
22 either a component of maintenance or a component of

1 continuous treatments in the relapsed/refractory
2 setting such that many of my patients in clinic
3 really don't get a complete treatment-free interval
4 throughout the course of the disease.

5 Now, the intensity of the treatment may
6 vary. They start with combinations of drugs, and
7 then single drug maintenance, but most of the
8 regimens we have available -- both newly diagnosed,
9 as well as relapsed myeloma -- involve ongoing
10 treatments, with the exception, I guess, of the
11 4-plus lines with the recent approval of CAR T
12 cells. Those patients generally are monitored
13 without any additional treatments after.

14 So yes, we do have disease-free intervals
15 where patients are in remission or response, but
16 there is benefit to continuing ongoing treatments
17 for many of these regimens, so there's really no
18 treatment-free interval for many of our patients.

19 DR. VASAN: For instance, you presented a
20 trial where there's indefinite lenalidomide
21 maintenance. Let's still consider that a
22 disease-free interval in a way --

1 DR. MAILANKODY: Yes.

2 DR. VASAN: -- because we're calling it
3 maintenance therapy. It's micrometastatic or some
4 microscopic disease, so let's just call it that.
5 Even with that, is there a correlation?

6 DR. MAILANKODY: Correlation with --

7 DR. VASAN: With improved response to
8 subsequent therapies.

9 DR. MAILANKODY: Oh, sure. So I guess the
10 question is, if you have a good response to a prior
11 therapy, would you respond also with -- is that
12 indicative of a good response for the next line of
13 therapy? In general, yes, but the classes of
14 treatments change very dramatically. So for
15 instance, we have patients who get CAR T cells or
16 bispecific that have never received the T-cell
17 redirecting therapies that are refractory to all
18 other available classes that have had a very long
19 response to it. So I don't know, because the
20 classes are so different and there are so many
21 different classes, that a response or duration of
22 response to a previous line fully informs next-line

1 response.

2 That said, there are some common themes to
3 patients who don't respond; for instance, patients
4 with high-risk cytogenetics, patients who have
5 extramedullary disease, patients who have
6 RSS stage 3 disease, and fewer of those patients
7 respond and respond to a shorter period of time,
8 largely agnostic of the treatment classes that we
9 have available.

10 DR. VASAN: Thank you.

11 DR. MADAN: Thank you, Dr. Vasan.

12 Dr. Frenkl?

13 DR. FRENKL: Hi. Thank you so much. I was
14 wondering if you could expand a little bit on the
15 bridging therapies. I saw that you said low
16 response and limited options. So could you just
17 tell us a little bit more about how physicians go
18 about that, and why the options are limited when it
19 seems like there are so many drugs available?

20 DR. MAILANKODY: Yes.

21 DR. FRENKL: Thank you.

22 DR. MAILANKODY: I think the slide that

1 refers to the current use of CAR T cells, which is
2 for patients who have received four or more lines
3 of treatment, this is a patient on 5th line that is
4 coming to us to just get CAR T cells. Invariably,
5 they have received a proteasome inhibitor, an
6 immunomodulatory drug, and CD38 antibody
7 previously; that's the requirement. Many of them
8 have actually received more than one
9 immunomodulatory drug, more than one PI, and a CD38
10 antibody, so a large proportion of these patients
11 are definitely triple-class refractory. Many of
12 what we would consider as penta-refractory, which
13 means that they're refractory to five different
14 drugs that are the backbone of many of our
15 treatments.

16 I also mentioned that increasingly we're
17 using all three classes of drugs in the first- and
18 certainly in the second-line treatment, so you can
19 imagine by the time they come to 5th line, we don't
20 have a lot of effective treatment choices. We have
21 a lot of choices, but they're not necessarily
22 effective. Many of these patients are also

1 progressing on available treatment, and like I
2 said, there is about 8 to 12 weeks that we need,
3 when I think about giving somebody a CAR T cell, to
4 them actually getting a CAR T cell because of
5 various logistical or other bottlenecks.

6 So in that setting, our choices of effective
7 bridging is somewhat limited, and this is borne out
8 by clinical trials. So that led to the approval
9 where bridging therapy was used for these trials,
10 and response rates are under 30-40 percent. That's
11 also borne out by real-world experience and our own
12 experience here, and those responses don't tend to
13 be particularly robust or durable.

14 The second challenge is, in our attempt to
15 get deeper responses, if you use multidrug
16 traditional chemotherapy, which we sometimes do,
17 that can lead to cytopenias, infections in some
18 cases, and further delays in patients getting CAR T
19 cells. So our ability to get a good response and
20 our ability to manage toxicities in this setting is
21 somewhat limited such that, invariably, some of our
22 patients are going into these treatments with

1 rapidly progressing disease, or symptomatic
2 disease, or ongoing toxicities from their bridging
3 therapy. So I would say it is one of the key
4 challenges as we think about using these treatments
5 in clinic.

6 DR. FRENKL: Thank you.

7 DR. MADAN: Thank you.

8 Dr. Lieu?

9 DR. LIEU: Hi. This is Chris Lieu,
10 University of Colorado. Thank you so much for that
11 outstanding talk. You showed a lot of different
12 trials in different settings, and one of the things
13 that struck me was this difference in
14 progression-free survival, which in some cases were
15 extreme differences between treatment arms, but
16 then when you look at overall survival, several of
17 the studies have either no significant difference
18 in overall survival or, despite a humongous
19 difference in progression-free survival, the
20 overall survival difference is sometimes somewhat
21 marginal in comparison.

22 I understand that in an indolent

1 disease -- and I'm a solid tumor oncologist, so I
2 think about this like a neuroendocrine tumor. I
3 just want to hear your impression about how you as
4 a clinician treating patients interpret this
5 difference in progression-free survival knowing
6 that overall survival may be marginally different,
7 or in some cases not different at all, and how you
8 perceive the benefit to your patients when thinking
9 about these options if you're not massively
10 increasing overall survival but you have this long
11 progression-free survival period.

12 DR. MAILANKODY: Thank you. I'll give you
13 my perspective. This is obviously very important,
14 and I don't know that I know all the answers, but
15 my perspective is the following, which is if you
16 look at the earliest randomized studies -- those
17 were some of the first studies I presented in
18 relapsed/refractory refractive multiple myeloma,
19 before we had the plethora of treatment choices we
20 had available -- these are the studies that looked
21 at lenalidomide and dexamethasone as a control arm
22 and adding a novel drug or a new drug as

1 combination.

2 There were four studies that I highlighted.
3 Each of them, the initial reports showed PFS and no
4 difference in OS. And now with extended follow-up,
5 three out of those four studies have also shown
6 overall survival benefit. So I think that reflects
7 that in an era when these studies were done, where
8 there were limited post-progression treatment
9 choices both here in the U.S. and internationally
10 where these studies are done, it was a little bit
11 easier to follow patients long enough and have a
12 relatively accurate estimate of long-term overall
13 survival.

14 What has changed in the last 5 to 7 years is
15 that, number one, patients are living longer, which
16 is a great challenge to have, and they're living
17 longer because they can get multiple other lines of
18 treatments. So increasingly common, the patients
19 are progressing.

20 DR. FRIMPONG: Sorry, Dr. Mailankody. At
21 this moment, there shouldn't be any discussion in
22 regards to questions that's geared towards the

1 committee from your end.

2 DR. MAILANKODY: Oh, fair enough. Sorry.

3 DR. FRIMPONG: No problem.

4 Dr. Madan, I hand it back to you.

5 DR. MADAN: No problem.

6 Go ahead. Okay, continue with that
7 guidance, Dr. Mailankody.

8 DR. MAILANKODY: So should I speak about
9 that or --

10 DR. FASHOYIN-AJE: May I interrupt, please?

11 DR. MADAN: Go ahead. Who is this?

12 DR. FASHOYIN-AJE: Yes. Hi. Good morning.

13 This is Lola Fashoyin-Aje from the Office of
14 Clinical Evaluation in CBER. I would like to
15 interrupt just to remind the committee and the
16 chair that Dr. Mailankody is an FDA invited guest,
17 and the purview and the scope of his participation
18 today is to provide the disease overview, and he
19 should not be weighing in on any questions related
20 to the reason we are convening this ODAC today.

21 Thank you.

22 DR. MADAN: Okay.

1 So I think we've got two -- well, let me
2 see. I think we have two more questions here. Are
3 hands still raised?

4 Dr. Lattimore?

5 MS. LATTIMORE: Hi. Thank you. Thank you
6 for that background, though; it was incredibly
7 helpful. You showed a slide that had 5th-line
8 treatments or you showed a progression over time of
9 where uptake of subsequent treatments waned over
10 time and the use of subsequent treatments really
11 narrowed, and you mentioned, in particular, access
12 issues and access to CAR T in particular.

13 Can you share a little bit and expand on
14 contributing factors to access to this treatment
15 and what might play into that a little bit more?

16 DR. MAILANKODY: I will clarify that the
17 data I presented from the study was from 2020, so
18 the CAR T cells were not quite widely available
19 quite yet, but the same themes hold true. What the
20 data showed was that I think as you go further in
21 lines of treatment, fewer and fewer patients get
22 subsequent lines of treatment, and the reasons are

1 probably, one, is patients unfortunately die.
2 Second is the median age, as I showed, is about
3 69 years for patients with multiple myeloma, so
4 accrual of toxicities; inability to travel to
5 treatment sites; and other reasons may preclude
6 getting other lines of treatment.

7 Specifically about access to CAR T cells, I
8 would say the challenges are that at this point,
9 CAR T cells are available in limited specialized
10 centers, so it's not every oncology practice or
11 every oncologist that can give his or her patient
12 CAR T cells currently; and therefore, patients need
13 to be referred to specialized centers that have
14 access to CAR T cells, number one.

15 The second is these are autologous CAR T
16 cells, so there's somewhat limited availability of
17 slots to apheresis and manufacture that we hope will
18 improve over time, but that also leads to a
19 bottleneck. And the third, I guess, is that there
20 are significant disruptions to patients own life.
21 They have to sometimes relocate to a different city
22 and live here for 4, 6, 8 weeks to get these

1 treatments, which may not be feasible for all
2 patients or may not be considered for all patients.
3 So all of those factors put together, I think the
4 use of treatments like CAR T cells, particularly,
5 and access to them continues to be a significant
6 challenge.

7 MS. LATTIMORE: And can you give me an
8 understanding of how many specialty centers exist
9 currently?

10 DR. MAILANKODY: I think it's different for
11 different products. I don't know the exact number,
12 but I would guess it's somewhere between 50 to
13 100 sites across the U.S., but that's my estimate.
14 And it's different for different products because
15 different hospitals and health centers have
16 licensing agreements with different products, and
17 fact declaration is required for many of them; But
18 I would say for the different approved indications
19 for CAR T cells in myeloma and other diseases is
20 somewhere between 50 to 100 sites perhaps, and
21 they're all largely focused in larger cities and
22 less access in rural areas and smaller cities. So

1 there are certain parts of the country where people
2 may have to travel 2-3 hours before they get to the
3 closest CAR T cell center.

4 DR. MADAN: Okay. Thank you,
5 Dr. Mailankody, for that presentation and question
6 and answer session. I think it informed the
7 audience and our panel as well.

8 DR. MAILANKODY: Thank you.

9 Both the Food and Drug Administration and
10 the public believe in a transparent process for
11 information gathering and decision making. To
12 ensure such transparency at the advisory committee,
13 the FDA believes that it is important to understand
14 the context of an individual's presentation.

15 For this reason, the FDA encourages all
16 participants, including the applicant's
17 non-employee presenters, to advise the committee of
18 any financial relationships that they may have with
19 the applicant, such as consulting fees, travel
20 expenses, honoraria, and interests of the
21 applicant, including equity interests and those
22 based upon the outcome of the meeting.

1 Likewise, FDA encourages you at the
2 beginning of your presentation to advise the
3 committee if you do not have any such financial
4 relationships. If you choose not to address this
5 issue of financial relationships at the beginning
6 of the presentation, it will not preclude you from
7 speaking.

8 So with that, we will now proceed with the
9 Janssen Biotech presentation. I turn the floor
10 over to you.

11 **Applicant Presentation - Sen Zhuang**

12 DR. ZHUANG: Good morning, Mr. Chair,
13 members of the advisory committee, and members of
14 the FDA. Sen Zhuang, Vice President of Oncology
15 Research and Development from Johnson & Johnson.
16 Thank you for the opportunity today to review the
17 data supporting Carvykti, which will be referred to
18 as cilta-cel, for the treatment of patients with
19 relapsed and lenalidomide refractory multiple
20 myeloma.

21 Cilta-cel is a BCMA or B cell maturation
22 antigen direct CAR T therapy that is genetically

1 engineered from patients' own T cells to target
2 multiple myeloma. It was approved by the U.S. FDA
3 in February of 2022 for the treatment of patients
4 with relapsed or refractory multiple myeloma who
5 have received four or more prior lines of therapy,
6 including a proteasome inhibitor, an
7 immunomodulatory agent, and an anti-CD38 monoclonal
8 antibody.

9 Cilta-cel is among one of the most active
10 agents ever developed for multiple myeloma. In the
11 pivotal CARTITUDE-1 study, 97 patients with highly
12 advanced multiple myeloma was treated with
13 cilta-cel. The overall response rate was
14 98 percent and stringent complete response rate was
15 over 80 percent. With extended follow-up, the
16 median progression-free survival was 34.9 months
17 compared with historic control of approximately
18 3 to 5 months in a similar patient population.

19 Today we are here to discuss the CARTITUDE-4
20 study and to seek an expanded indication for the
21 treatment of patients with relapsed and
22 lenalidomide refractory multi myeloma. The

1 CARTITUDE-4 study is an international,
2 randomized-controlled, phase 3 study of cilta-cel
3 in patients with relapsed or refractory multi
4 myeloma who have received 1 to 3 prior lines of
5 therapy and whose disease are refractory
6 lenalidomide. This is a patient population with
7 high unmet medical need, with a median
8 progression-free survival of approximately
9 12 months with the current standard of care.

10 A one-time infusion of cilta-cel
11 demonstrates clinically meaningful and highly
12 statistical significant improvement in
13 progression-free survival, the primary endpoint,
14 and key secondary endpoints of overall response
15 rate, complete response rate, MRD, or minimum
16 residual disease, negativity rate compared with
17 continuous standard therapy.

18 These deep and durable responses are not
19 attainable by the standard treatment modalities,
20 and with additional follow-up has translated into a
21 strong trend in improvement of overall survival
22 that has further strengthened as data mature.

1 Additionally, subgroup analyses demonstrate
2 consistent benefit of cilta-cel in both
3 progression-free survival and overall survival
4 across all subgroups. You will hear that a safety
5 profile observed in the cilta-cel CARTITUDE-4 study
6 is consistent with its known safety profile in the
7 approved label and is consistent with the mechanism
8 of action as CAR T therapy.

9 The observed early imbalance of the
10 progression-free survival and overall survival
11 events are driven by patients who did not receive
12 cilta-cel, and it was not due to cilta-cel
13 toxicity. In totality, the data we will present
14 today will support a positive benefit and risk for
15 cilta-cel for the treatment of patients with a
16 relapse in lenalidomide refractory multiple
17 myeloma. Consistent with the study population of
18 the CARTITUDE-4 study, the proposed indication is
19 cilta-cel for the treatment of patients with
20 relapsed or refractory multiple myeloma who have
21 received at least one prior lines of therapy and
22 whose disease is refractory to lenalidomide.

1 With this information in mind, here is the
2 agenda of today's presentation. Dr. Irene Ghobrial
3 from Dana-Farber Cancer Institute will discuss the
4 continued unmet medical need for the treatment of
5 patients with relapsed and refractory multiple
6 myeloma, particularly in the area of lenalidomide
7 refractory multiple myeloma, then Dr. Jordan
8 Schecter from Johnson & Johnson will review the
9 efficacy and safety data supporting today's
10 application.

11 Finally, we have Dr. Sundar Jagannath from
12 Mount Sinai in New York City who will conclude the
13 presentation with his clinical perspectives. With
14 us here are additional experts to help answer
15 potential questions you may have. All outside
16 experts have been compensated for their time for
17 today's meeting. Thank you, and I'll now turn the
18 presentation to Dr. Ghobrial.

19 **Applicant Presentation - Irene Ghobrial**

20 DR. GHOBRIAL: Thank you. My name is Irene
21 Ghobrial. I'm a Professor of Medicine at
22 Dana-Farber Cancer Institute, Harvard Medical

1 School. I'm a physician scientist working at
2 Dana-Farber now for over 19 years. In addition to
3 my work with patients with multiple myeloma, I run
4 a translational lab, and I am currently the
5 principal investigator of a clinical trial with
6 cilta-cel in high-risk, smoldering myeloma. I'm
7 happy to be here to review the background of
8 multiple myeloma and the clear unmet need for this
9 patient population.

10 Multiple myeloma is the second most common
11 hematological malignancy. Over the last 15 years,
12 survival has improved significantly. Before 2010,
13 our patients only survived between 2 to 5 years.
14 Since 2011, patients are living a median of
15 10 years and longer. This improvement is due to
16 the use of ongoing combinations of therapy and the
17 new era of immunotherapy, including CAR T therapy
18 and bispecific antibodies. This has further
19 strengthened the survival of our patients. Despite
20 all of these advances, myeloma is still an
21 incurable disease. We owe it to our patients to
22 keep improving our therapies.

1 You've already heard about CARTITUDE-1 data
2 and how CAR T therapy has emerged as an important
3 late line treatment in multiple myeloma and has
4 truly changed the landscape of patient care. The
5 question we need to consider now is do we need to
6 use this beneficial therapy once patients become
7 lenalidomide refractory rather than the current
8 indication following 4 lines of therapy.

9 I would personally say yes for several
10 reasons. Multiple studies have shown that the use
11 of our best therapy in earlier setting can lead to
12 deeper remission and longer outcome for our
13 patients with myeloma. We also know that patients
14 are lost to attrition with each line of therapy.
15 Biologically, T cells become more exhausted with
16 advanced disease and subsequent lines of therapy;
17 therefore, the development of CAR T cells from less
18 exhausted T cells in an earlier disease setting
19 would lead to the development of more robust CAR T
20 cells, which would indicate that those T cells
21 would have better long-term outcome. Additionally,
22 the current standard of care in first relapse is

1 used indefinitely and is associated with its own
2 toxicity profile. Using one-and-done CAR T therapy
3 earlier helps improve the benefit for our patients.

4 Let me review each of these points more
5 closely. Initial treatment is the best chance for
6 deep and durable remission. You can see here the
7 high attrition and death rate, which underscores
8 the need to use more effective treatments earlier.
9 Our patients may not live to the 4th or 5th line of
10 therapy. With the current indication, as few as
11 15 percent of patients are able to receive
12 cilta-cel as a treatment option.

13 Multiple studies have shown that the T cell
14 repertoire changes over the course of the disease.
15 This is a key research focus in my lab, where we
16 are studying single cell sequencing of immune
17 cells. Changes occur in the immune system during
18 disease progression with a significant increase in
19 exhausted T cells with each progression. We see
20 that there are more terminally differentiated
21 T cells at the later stages of the disease.
22 Developing CAR T cells from less exhausted T cells

1 is beneficial.

2 Several studies have shown that naive-like,
3 central memory T cells that are enriched in earlier
4 disease stages are associated with a better
5 clinical response. In addition, the longer PFS
6 observed in CARTITUDE-1 was directly associated
7 with a less exhausted stem-cell-like phenotype of
8 the CAR product.

9 Here are the current treatment options in
10 the second line of therapy, and many of them are
11 not as effective in lenalidomide refractory
12 disease. All of these options require continuous
13 therapy and therefore come with added toxicity and
14 added burden for the patient who has to think of
15 their disease every day of their life. The
16 potential benefit I can see using cilta-cel earlier
17 is not only to provide patients a high response
18 rate, but also a life without continuous therapy.

19 Here's a schematic to better understand the
20 patient's journey with cilta-cel in the CARTITUDE-4
21 study. Upon relapse, we look to see if CAR T is a
22 viable option for our patients with myeloma. Once

1 selected, we collect the T cells by doing
2 apheresis, which is a simple one day outpatient
3 procedure. Then all patients are put on at least
4 one cycle of bridging therapy to control disease.
5 In the CARTITUDE-4 protocol, this was specified to
6 be one of two standards of care triplets; however,
7 in clinical practice, the bridging therapy would be
8 tailored to the individual needs of the patient.

9 The choice of bridging therapy continues to
10 evolve. Our goal is to control the disease with
11 bridging therapy before the patient receives CAR T
12 therapy. Once we have all the T cells back, we
13 perform lymphodepletion for 3 days with fludarabine
14 and cyclophosphamide, and then we infuse the CAR T
15 cells, and finally we closely monitor the patients
16 for toxicities of the CAR T center.

17 With each successive relapse, symptoms
18 return, quality of life worsens, and the chance and
19 deterioration of response decreases. Patients with
20 lenalidomide refractory multiple myeloma have poor
21 outcomes with current standard therapy; therefore,
22 there remains a significant and critical unmet need

1 for new therapeutic options in these patients to be
2 used earlier in the treatment sequence. I can't
3 emphasize enough that we should provide our
4 patients with the best treatments as early as
5 possible. This would help improve their outcomes,
6 as they, unfortunately, may never get to later
7 lines of therapy. CAR T offers our patients a
8 great opportunity to have a deeper remission and a
9 better long-term outcome.

10 Thank you. I'll turn the presentation to
11 Dr. Schechter to review the clinical data.

12 **Applicant Presentation - Jordan Schechter**

13 DR. SCHECTER: Thank you, Dr. Ghobrial.

14 My name is Jordan Schechter. I am the Vice
15 President for Clinical Development of Myeloma at
16 Johnson & Johnson, and I'm pleased to present the
17 clinical efficacy and safety data supporting
18 cilta-cel based on the CARTITUDE-4 study. This
19 study was designed in consultation with the FDA and
20 other regulatory authorities worldwide. The study
21 population in CARTITUDE-4 includes adults diagnosed
22 with multiple myeloma who've received between

1 1 and 3 prior lines of therapy, including prior
2 exposure to a proteasome inhibitor, an
3 immunomodulatory drug, and additionally who are
4 refractory to lenalidomide.

5 Prior to randomization, investigators
6 selected the standard of care for each patient.
7 With this decision, patients were to be randomized
8 1 to 1 to receive either standard of care or
9 cilta-cel. Standard of care therapy consisted of
10 the investigators' choice of either PVD, which is
11 pomalidomide, bortezomib, and dexamethasone, or
12 DPD, daratumumab, pomalidomide, and dexamethasone.

13 Patients randomized to cilta-cel underwent
14 apheresis to acquire peripheral blood mononuclear
15 cells, followed by at least one cycle of bridging
16 therapy with the aforementioned standard of care
17 triplet. Thereafter, patients received
18 lymphodepletion consisting of cyclophosphamide and
19 fludarabine for 3 days. Cilta-cel was then
20 administered days 5 through 7 after the start of
21 the conditioning regimen. Crossover was not part
22 of the study design; that is, patients randomized

1 to standard of care did not have cilta-cel
2 automatically offered at progression, although some
3 patients did receive commercial or investigational
4 CAR T at the discretion of the treating physician.

5 The primary endpoint of the study was
6 progression-free survival. Key secondary endpoints
7 included complete response or better; overall
8 response; MRD negativity; and overall survival.

9 The primary endpoint and major secondary
10 response-related endpoints were assessed by the
11 International Myeloma Working Group criteria using
12 a computerized algorithm and also an independent
13 review committee.

14 As you can see on this slide, the two arms
15 were well balanced in terms of baseline
16 demographics, disease characteristics, including
17 patients with higher risk disease. The median age
18 of study participants was around 61, with slightly
19 greater proportion of male patients in both groups.
20 Most patients in both arms had a baseline ECOG
21 status of zero and an ISS stage of 1. Soft tissue
22 plasmocytomas, which are known to be a high-risk

1 feature, were slightly higher in cilta-cel patients
2 compared to standard of care patients.

3 The median time for myeloma diagnosis to
4 randomization was 3 years, with approximately
5 one-third of patients having one prior line and
6 two-thirds having between 2 and 3 prior lines.
7 About 60 percent of patients had high-risk
8 cytogenetics and all were refractory to
9 lenalidomide as per study entry criteria. About a
10 quarter of patients were refractory to an anti-CD38
11 monoclonal antibody.

12 Here you can see the CONSORT diagram. The
13 ITT analysis consisted of 419 patients randomized,
14 208 to cilta-cel, 211 to standard of care. Of
15 these, 416 patients received any part of study
16 treatment. This comprises our safety analysis set.
17 Three patients were randomized to standard of care
18 but were not treated. Of the 208 patients
19 randomized to cilta-cel, 32 patients experienced
20 disease progression or died prior to receiving
21 cilta-cel as study treatment. Of those,
22 20 patients received cilta-cel as subsequent

1 therapy after disease progression. This leaves us
2 with 176 patients in the as-treated patient
3 population subset. There are currently 143
4 cilta-cel-treated patients who are still in ongoing
5 follow-up for progression compared to only
6 77 patients who received standard of care.

7 Now, let's turn to our results starting with
8 our primary endpoint. A one-time infusion of
9 cilta-cel demonstrated clinically meaningful and
10 statistically significant improvement in the
11 primary endpoint of progression-free survival as
12 compared to continuous therapy with standard of
13 care. The median progression-free survival for
14 cilta-cel was not reached. This compares to
15 11.8 months with standard of care.

16 In consultation with the FDA, we analyzed
17 the primary endpoint in two ways. The prespecified
18 primary analysis resulted in a weighted hazard
19 ratio of 0.26. This indicates a 74 percent
20 reduction in the risk of death or progression
21 compared to standard of care. A weighted hazard
22 ratio includes events which occur after 8 weeks.

1 The standard unweighted, intent-to-treat analysis,
2 including all events, resulted in a hazard ratio
3 for PFS of 0.40.

4 Now, the PFS curves do cross. This depicts
5 an earlier balance of PFS events. In the first
6 8 weeks of the study, 22 PFS events were observed
7 in the cilta-cel arm compared with eight in the
8 standard of care arm; however, during this initial
9 period, both arms were prescribed the same exact
10 standard of care treatments; in fact, all 22 events
11 in the cilta-cel arm occurred prior to cilta-cel
12 infusion.

13 We'll review the crossing of the curves in
14 more detail shortly. First, let's look at the
15 overall data across subgroups. You can see that
16 the cilta-cel benefit was consistent across every
17 single subgroup test step. These data reaffirm
18 that all patients have the potential to experience
19 a meaningful benefit in terms of progression-free
20 survival.

21 The progression-free survival results are
22 supported by robust secondary endpoints, all

1 favoring cilta-cel versus standard of care.
2 Cilta-cel demonstrated deep and durable responses
3 following the single infusion. This resulted in a
4 statistically significant odds ratio for obtaining
5 a complete response or better of 10.3 between
6 cilta-cel and the standard of care for the ITT
7 population. In terms of overall response rate,
8 85 percent of all patients randomized to cilta-cel
9 obtained the response compared to only 67 percent
10 with standard of care.

11 Importantly, when we consider the
12 176 patients who received cilta-cel as study
13 treatment, 99 percent, or 175 out of the 176
14 patients, had an overall response. The depth and
15 durability of response observed with cilta-cel is
16 something not observed with any other modality, and
17 it is important for long-term outcomes such as
18 progression-free survival and, of course, overall
19 survival.

20 Now, let's look at the DOR curves. Duration
21 of response includes patients who achieve the
22 response of PR or better. The DOR is calculated

1 from the start of a response to the first
2 documented evidence of disease progression or
3 death, whichever comes first. Median DOR was not
4 reached for cilta-cel and was 16.6 months for
5 standard of care. Eighty-five percent of the
6 patients in the cilta-cel arm were in response at
7 12 months compared to only 63 percent in the
8 standard of care arm.

9 The endpoint of MRD, or minimal residual
10 disease, was also met, with an odds ratio of 8.7
11 and a significant p-value of less than 0.0001 in
12 the ITT population. MRD negativity is highly
13 indicative of long-term outcomes, and therefore
14 it's a very meaningful measure for patients. In
15 patients evaluable for MRD, 88 percent in the
16 cilta-cel arm achieved MRD negativity at 10 to the
17 minus 5 threshold compared to only 33 percent in
18 the standard of care.

19 Now, of course, overall survival is a key
20 secondary endpoint, so let's take a look at the
21 most recent data. Our most recent data cut for
22 overall survival was in December of 2023. This was

1 conducted at the request of the European Medicines
2 Agency. At this point, we've observed 48 deaths in
3 the cilta-cel arm, 77 deaths in the standard of
4 care arm, and the resulting hazard ratio for OS is
5 0.57. Now, additional follow-up will not change
6 the early portion of the curve; however, we see an
7 increasing separation of the OS curves over time.
8 And when we look at the forest plot in OS using the
9 most recent data cut, we also see consistent effect
10 favoring cilta-cel for each and every subgroup
11 assessed.

12 Looking further into the deaths, the only
13 period in which we see more deaths on the
14 experimental arm versus standard of care arm is
15 between 0 and 3 months. There were 7 deaths in the
16 experimental arm and one death in the standard of
17 care arm. Recall that most patients who progressed
18 early did so prior to cilta-cel treatment, so a
19 more informative way to look at these data is to
20 break it out by cilta-cel exposure.

21 Here you can see that six out of the seven
22 deaths prior to 3 months were in patients

1 randomized to cilta-cel but progressed prior to the
2 infusion, and thus never received cilta-cel. There
3 was one patient who received cilta-cel as a
4 subsequent therapy post-disease progression. Now,
5 it is this imbalance that is driving the initial
6 crossing of the OS curves; thereafter, OS events
7 are balanced between months 3 and 6 and then tend
8 towards improvement, with fewer deaths observed in
9 the experimental arm compared to the standard of
10 care.

11 Let's take a closer look at these early
12 deaths by cause. This slide presents the ITT
13 analysis, including all events occurring after
14 randomization. We see that most early deaths
15 occurred in patients randomized but did not yet
16 receive cilta-cel, and this was driven by early
17 progression of disease. As you can see, more
18 patients progressed on the standard of care arm
19 compared to those who were actually treated with
20 cilta-cel.

21 Five out of the eight AEs leading to death
22 were in patients with progressive disease and

1 received cilta-cel in subsequent therapy. As I
2 will review in the safety section, these rapidly
3 progressing patients are more vulnerable, and thus
4 more likely to experience serious AEs. This helps
5 reinforce the value of disease control prior to
6 lymphodepletion and cilta-cel infusion.

7 In patients that obtained disease control
8 and received cilta-cel as study treatment, there
9 were only 3 AEs leading to death, and these were
10 all due to COVID-19 infections. Importantly, these
11 deaths occurred during the height of the pandemic
12 and also occurred in patients who are not fully
13 vaccinated.

14 The same trends are seen in PFS, with the
15 imbalance in progression occurring early, within
16 the first 2 months in patients that either never
17 received cilta-cel or those who received cilta-cel
18 as subsequent therapy after disease progression.
19 None of the 22 patients who progressed within the
20 first 8 weeks actually received cilta-cel
21 treatment. By month 2 and beyond, we start to see
22 more PFS events occurring in the standard of care

1 arm.

2 Now, we've performed an extensive analysis
3 to see if any parameters explain the imbalance in
4 early progression on the cilta-cel arm prior to the
5 cilta-cel infusion. Some of the parameters we
6 assessed are listed here, but now let me show you a
7 schematic to help visualize these investigations
8 and also provide a summary of our findings.

9 As shown previously, the baseline
10 demographics and disease characteristics, even
11 those indicative of higher risk disease, were well
12 balanced at study baseline. We also looked at
13 study related factors such as the apheresis
14 procedure and the time for randomization to start
15 of therapy. The median time from randomization to
16 start of therapy was 6 days in standard of care
17 compared to 7 days in the cilta-cel arm, and this
18 was all within the protocol-specified, 7-day
19 randomization window.

20 We assessed the CAR T cells manufacturing
21 time as well. The median time from apheresis to
22 product release for patients with early PFS versus

1 those without early PFS was 59 days versus 57 days.
2 The median number of days patients spent off
3 bridging therapy prior to progression was zero,
4 ranging from 0 to 15. This indicates that most
5 patients were actively receiving bridging therapy
6 at the time of disease progression; therefore, it
7 is unlikely that manufacturing time played a major
8 role in the early PFS events. Patients who had
9 early PFS events did not start lymphodepletion, so
10 exposure to lymphodepletion could not have been a
11 cause of early progression.

12 Finally, we looked at the dose intensity of
13 bridging therapy. Of the many analyses we
14 conducted, we found that the lower relative dose
15 intensity of bridging therapy may have contributed
16 to the imbalance in early progression, although to
17 what extent is unclear. Per protocol, doses of
18 bridging therapy can be decreased secondary to
19 patient tolerability and at the discretion of the
20 treating physician.

21 We evaluated the relationship between dose
22 of bridging therapy and the occurrence of early PFS

1 events. You can see that there was a lower
2 relative dose intensity of pomalidomide, as well as
3 a lower relative dose intensity of bortezomib in
4 patients randomized to cilta-cel compared to
5 standard of care. The doses of dexamethasone and
6 daratumumab were well balanced between the arms,
7 and then when we looked at patients who had early
8 PFS events across both treatment arms, a lower
9 relative dose intensity of pomalidomide or
10 bortezomib may have been associated with a higher
11 risk of progression.

12 Again, the clinical impact of these
13 differences is unclear, but these differences do
14 emphasize the need to optimize bridging therapy and
15 provide standard doses of bridging therapy to help
16 control disease before lymphodepletion and CAR T
17 administration.

18 Now, to summarize the efficacy findings, a
19 one-time infusion of cilta-cel demonstrated deep
20 responses with statistically significant and
21 clinically meaningful improvement in progression-
22 free survival that's expected to contribute to

1 prolonged overall survival. The primary endpoints
2 of PFS achieved a hazard ratio of 0.40, indicating
3 a 60 percent reduction in the risk of death or
4 progression for cilta-cel compared to standard of
5 care. Additionally, cilta-cel showed significant
6 improvement in measurements of disease burden, and
7 while the overall survival data are still maturing,
8 the data we have to date suggests an improving
9 trend for prolonged survival with cilta-cel versus
10 standard of care, and importantly, the beneficial
11 results were consistently observed across every
12 subgroup that we assessed.

13 Now, let's turn our attention to the safety
14 data supporting our application. As described
15 earlier, the sponsor's safety analysis originally
16 included 208 patients in each arm who received any
17 part of study treatment. The FDA has asked us to
18 base the safety on those who received cilta-cel
19 product that met all release specifications. This
20 includes 188 patients in total; 170 out of the
21 176 patients received a conforming cilta-cel
22 product as study treatment, and 18 out of the

1 20 patients that received cilta-cel as subsequent
2 treatment received a conforming product.

3 The overall safety profiles between the
4 original safety analysis with 208 patients and the
5 FDA's requested safety analysis with 188 patients
6 is very similar; therefore, for simplicity, we will
7 present only these data for the FDA safety analysis
8 set. Overall, the safety profile was similar
9 between the arms and consistent with the approved
10 cilta-cel label, as well as the known mechanism of
11 action of CAR T cell therapy. All patients in both
12 arms experienced one or more adverse events and
13 most experienced one or more grade 3 or 4 adverse
14 events. Thirty-five percent and 38 percent of
15 patients reported a non-fatal serious adverse event
16 in cilta-cel and standard of care, respectively.

17 As of the November 2022 data cutoff, adverse
18 events leading to death were reported in 11 percent
19 of patients in the cilta-cel arm and 8 percent of
20 patients in standard of care, but using the most
21 recent data cut in December of 2023, deaths due to
22 adverse events were reported in 12 percent versus

1 13 percent of patients. This helps address part of
2 the FDA's concern regarding the imbalance of AEs
3 leading to death.

4 Of those AEs leading to death, most were due
5 to infections in either arm, the most common
6 infection being COVID-19 in the cilta-cel arm.
7 Hemorrhage and AML/MDS were also seen in 2 percent
8 of cilta-cel patients. The adverse events in the
9 cilta-cel arm were consistent with the known safety
10 of approved cilta-cel and the known mechanism of
11 action of CAR T cell therapy.

12 Adverse events that occurred at a rate of
13 greater than or equal to 30 percent in either arm
14 are presented here. All of these events observed
15 are already described in the current label for
16 cilta-cel. The most common grade 3 to 4 adverse
17 events were cytopenias. This was to be expected
18 based on the mechanism of action of CAR T cell
19 therapy and easily managed with supportive care by
20 the treating physician. Serious adverse events
21 were reported for 38 percent of patients in
22 cilta-cel and 39 percent of patients in the

1 standard of care arm. The most commonly reported
2 SAEs were pneumonia and viral infection across both
3 arms.

4 Now, let me briefly share the adverse events
5 of special interest for cilta-cel. We see that
6 CAR T-specific AEs were largely as expected. Most
7 cases of cytokine release syndrome were low grade
8 and resolved in about 3 days after onset. Rates of
9 neurologic toxicity, including ICANS, cranial nerve
10 palsies, peripheral neuropathy, and movement and
11 neurocognitive toxicity, or MNT, were all
12 relatively low, and most had resolved by the data
13 cutoff.

14 We also investigated secondary primary
15 malignancies. The overall incidence of secondary
16 primary malignancies during the study was similar
17 across both arms. In both, the most common
18 malignancies were cutaneous and non-invasive
19 cancers. Three percent of patients in the
20 cilta-cel arm had a hematologic secondary
21 malignancy, including myelodysplastic syndrome,
22 acute myeloid leukemia, and one patient who

1 developed CAR T positive peripheral T cell
2 lymphoma. The non-cutaneous and invasive solid
3 organ malignancies were balanced between the two
4 arms.

5 We also investigated the safety data for
6 patients who received cilta-cel as subsequent
7 therapy after progression relative to those who had
8 successful bridging therapy. You see that all
9 patients reported an adverse event, and patients
10 who received cilta-cel post-progression, which is
11 denoted in the light blue column, were more likely
12 to experience a serious adverse event. More of
13 these patients also died to adverse events.

14 In contrast, patients that received
15 cilta-cel as study treatment, which is in the dark
16 blue column, had a similar risk for fatal AEs
17 compared to the standard of care arm, and it's
18 understandable that patients with early progression
19 of the disease would experience more serious
20 adverse events and more adverse events leading to
21 death. The deaths due to adverse events in
22 patients who received cilta-cel as subsequent

1 treatment were mainly driven by infections and
2 bleeding events, and this was at a higher
3 percentage than those who received cilta-cel as
4 study treatment.

5 We compared CAR T-specific adverse events
6 for the patients who received cilta-cel as
7 subsequent therapy versus patients who received
8 cilta-cel as study treatment. As you can see in
9 this table, there are more AESIs overall and more
10 severe AEs reported for patients who received
11 cilta-cel as subsequent therapy post-progression.
12 This further highlights the importance of
13 controlling disease prior to lymphodepletion and
14 CAR T cell infusion.

15 In conclusion, safety findings from the
16 pivotal CARTITUDE-4 study were consistent with the
17 previous cilta-cel experience and the known
18 mechanism of action of CAR T cells. Our findings
19 suggest a reduction in the rate and severity of
20 CAR T-specific AEs in an earlier disease setting
21 compared to heavily pretreated relapsed/refractory
22 myeloma as in CARTITUDE-1.

1 I'd like to thank the committee for their
2 attention. I'd now like to invite Dr. Sundar
3 Jagannath to share his clinical perspective on
4 these data.

5 **Applicant Presentation - Sundar Jagannath**

6 DR. JAGANNATH: Thank you. I'm Sundar
7 Jagannath, the Director of Multiple Myeloma at
8 Tisch Cancer Institute and Professor of Medicine at
9 Icahn School of Medicine at Mount Sinai, New York.
10 I'm happy to be here today to share my clinical
11 perspective on the data I just reviewed and the
12 importance of having cilta-cel as an option for our
13 patients with lenalidomide refractory multiple
14 myeloma.

15 Overall, the data observed in CARTITUDE-4
16 were outstanding. The progression-free survival
17 improvements observed were clinically meaningful
18 with strong trends towards improved overall
19 survival. The minimum residual disease negativity,
20 or MRT negativity, of 88 percent for evaluable
21 patients further supports the potential for
22 improved long-term outcomes and data were

1 consistent across all the subgroups. The data do
2 not support exclusion of any subset of patients and
3 all patients have the potential to experience
4 meaningful benefit from cilta-cel. As discussed,
5 the imbalance in early progressions occurred mostly
6 in patients who did not receive cilta-cel, speaking
7 to the need for disease control prior to cilta-cel
8 infusion.

9 For patients who relapsed after 1 to 3 prior
10 lines of therapy, several triplet regimens have
11 been approved; however, these regimens have largely
12 been tested in variable lenalidomide naive or
13 lenalidomide sensitive patients. Among patients
14 with the triplet regimen, median progression-free
15 survival is around 12 months, with longer median
16 progression-free survival noted for the CANDOR and
17 IKEMA studies, which were largely not lenalidomide
18 refractory patients. Additionally, the response
19 shown in these studies relies on ongoing therapy
20 until progression of disease, potentially resulting
21 in cumulative toxicity and significant treatment
22 burden.

1 The MRD negativity rates for cilta-cel are
2 impressive, as MRD is an important marker for depth
3 and durability of remission. With a one-time
4 administration, cilta-cel produces responses
5 unattainable with other modalities. Of course, we
6 must consider the safety in our determination of
7 benefit-risk. There are risks with cilta-cel, as
8 with any therapy; however, these are well
9 understood by physicians and are manageable. CRS
10 and ICANS, for example, were mostly mild in
11 CARTITUDE-4 and all resolved. There is also my
12 experience in clinical practice, as we know how to
13 manage these events.

14 Infections are a known risk and
15 well-established management protocols are already
16 in place. Most of the fatal infections observed in
17 CARTITUDE-4 were due to COVID-19, which has now
18 been minimized through less prevalence of serious
19 COVID, vaccinations, and our understanding of the
20 disease. It is also important to consider that the
21 safety profile appears to be even better when used
22 in the earlier line setting.

1 There is less incidence and severity of CRS
2 and neurotoxicities, including MNT, movement and
3 neurocognitive toxicity being reported in
4 CARTITUDE-4 than in the prior CARTITUDE-1 study.
5 This continues to support the positive benefit-risk
6 for patients with 1 to 3 prior lines of therapy.
7 Not only are there receiving all the benefits of
8 CAR T therapy before T cell exhaustion, but their
9 safety profile tends to be more favorable.

10 To contextualize the safety profile, here
11 again I show cilta-cel compared to other available
12 treatments of relapses and refractory multiple
13 myeloma. You can see that cilta-cel has fewer
14 serious adverse events versus its counterparts.
15 Cilta-cel is a one-time infusion; however, the
16 other triplet regimens are given continuously until
17 disease progression, imparting additive toxicity
18 and treatment burden.

19 Cilta-cel brings significant clinical
20 benefit compared to other approved therapies, based
21 on improved efficacy, and has changed the treatment
22 landscape for late-stage patient care. Being able

1 to provide these deep and durable responses and the
2 chance for improved progression-free survival and
3 overall survival to patients with lenalidomide
4 refractory myeloma would be invaluable. Saving the
5 best therapy for last would not be good,
6 particularly in lenalidomide refractory myeloma, as
7 these patients tend to have worse outcomes.

8 While scientifically we want to understand
9 the imbalance in early progression observed in the
10 cilta-cel arm, we know from the data this was prior
11 to cilta-cel infusion. Regardless of the reason
12 for the imbalance of the overall benefit-risk, it
13 remains overwhelmingly positive. Based on the data
14 and my experience with the drug, cilta-cel would be
15 an appropriate treatment option for all patients
16 who meet the criteria consistent with CARTITUDE-4
17 enrollment. I hope to see this transformative
18 treatment option available to early align patients.
19 I appreciate your time and consideration. This
20 concludes our presentation. Thank you.

21 DR. MADAN: We will now proceed with FDA's
22 presentations, starting with Dr. Helkha

1 Peredo-Pinto.

2 **FDA Presentation - Helkha Peredo-Pinto**

3 DR. PEREDO-PINTO: Good morning. I'm Helkha
4 Peredo-Pinto, a pediatric hematologist/ oncologist
5 in the Division of Clinical Evaluation Hematology
6 in the Office of Clinical Evaluation in CBER, and
7 the primary reviewer for the supplemental
8 biological license application 125746/74 for
9 Carvykti, or ciltacabtagene autoleucel, which I
10 will refer to as cilta-cel during my presentation.

11 Cilta-cel is an autologous CAR T cell
12 therapy approved for the treatment of
13 relapsed/refractory multiple myeloma. The
14 applicant seeks expansion of the indication, as I
15 will discuss in my presentation. Listed on the
16 slide are the members of the FDA review team who
17 contributed to my presentation.

18 The applicant submitted the results of the
19 phase 3 CARTITUDE-4 trial to demonstrate the safety
20 and efficacy of cilta-cel for the proposed
21 indication. CARTITUDE-4 compares cilta-cel to
22 standard therapy in patients with relapsed/

1 refractory multiple myeloma who have received a
2 proteasome inhibitor and an immunomodulator drug
3 and who are refractory to lenalidomide. The trial
4 met its primary endpoint, demonstrating a
5 statistically significant improvement in
6 progression-free survival for patients randomized
7 to the cilta-cel arm compared to the standard
8 therapy arm.

9 During the review of the application, we
10 identified an increased rate of early deaths in the
11 cilta-cel arm compared to the standard therapy arm.
12 As a key issue, this issue is the main topic of
13 discussion at this Oncologic Drug Advisory
14 Committee meeting.

15 During my presentation, I will provide a
16 very brief overview of the treatment of
17 relapsed/refractory multiple myeloma and provide a
18 brief regulatory background. I will then summarize
19 the key efficacy and safety results from
20 CARTITUDE-4 and present the main topic for
21 discussion. My colleague, Dr. Wang, will then
22 provide an overview of the statistical

1 considerations pertaining to the main topic of
2 discussion. I will conclude my presentation by
3 briefly discussing FDA's consideration of the PRO
4 data submitted in the application and presented in
5 the discussion and voting question.

6 As discussed by Dr. Mailankody in the
7 detailed overview of multiple myeloma treatment,
8 shown here is the current treatment landscape for
9 treatment of relapsed/refractory multiple myeloma.
10 Please note, and as discussed by Dr. Mailankody,
11 the treatment landscape has changed drastically
12 over the last decade with multiple approvals.
13 Combination regimens typically include patients
14 that fall within the three main classes. This
15 includes immunomodulator drugs, proteasome
16 inhibitors, and anti-CD38 monoclonal antibodies.

17 For patients who have received 1 to 3 prior
18 lines of therapy, including a PI and an IMiD,
19 several treatment options exist, as shown in the
20 slide. Highlighted regimens on the slide were used
21 in the CARTITUDE-4 trial. Also available as
22 options for treatment in the relapsed/refractory

1 setting are cytotoxic polychemotherapy, cell-based
2 therapies by specific T-cell engagers, and also two
3 CAR T therapies.

4 Cilta-cel is an autologous CAR T therapy
5 that targets B-cell maturation antigen, which is
6 expressed on the surface of normal and malignant
7 plasma cells. Cilta-cel was approved in 2022 for
8 the treatment of adult patients with relapsed or
9 refractory multiple myeloma after four or more
10 prior lines of systemic therapy, including an IMiD,
11 a PI, and an anti-CD38 monoclonal antibody.

12 Approval was based on CARTITUDE-1, a single-arm,
13 open-label trial in 97 efficacy available patients
14 with relapsed/refractory multiple myeloma, with a
15 median of 6 prior lines of therapy.

16 The overall rate response was 97.9. Median
17 duration was not reached. The ORR and the
18 durability were considered a clinical benefit in
19 this patient population. The approved dose is
20 0.5 to 1 million viable CAR positive cells per
21 kilogram of body weight. The cilta-cel product
22 labels include a boxed warning for cytokine release

1 syndrome; neurological toxicities; hemophagocytic
2 lymphohistiocytosis macrophage activation syndrome,
3 HLH/MAS; prolonged and recurrent cytopenia; and
4 secondary hematological malignancies.

5 With the current submission, the applicant
6 is seeking an indication for the treatment of adult
7 patients with relapsed or refractory multiple
8 myeloma, who have received at least one prior line
9 of therapy, including an IMiD and an PI, and who
10 are lenalidomide refractory. The proposed dose is
11 the same as the approved dose of 0.5 to 1 million
12 viable CAR positivity cells per kilogram of body
13 weight. The data to support the indication is
14 based on the results from CARTITUDE-4, which I will
15 now discuss.

16 CARTITUDE-4 is an ongoing, open-label,
17 randomized-controlled trial that enrolled patients
18 with relapsed/refractory multiple myeloma who had
19 received 1 to 3 prior lines of therapy, including a
20 PI and an IMiD, and who were refractory to
21 lenalidomide. Patients were randomized 1 to 1,
22 either to standard therapy arm or cilta-cel arm.

1 The standard therapy arm included either the PVD or
2 the DPD regimens, which were continued until
3 disease progression or toxicity. The cilta-cel arm
4 included leukapheresis; bridging therapy; which is
5 administered to stabilize the disease during the
6 product manufacture; lymphodepleting chemotherapy;
7 followed by the cilta-cel infusion.

8 Patients could receive one or more cycles of
9 bridging therapy during the product manufacture.
10 Of note, the investigator selected the standard
11 therapy and bridging therapy prior to
12 randomization, based on prior therapies. The
13 primary endpoint was progression-free survival per
14 an independent review committee assessment. The
15 key secondary endpoints were overall response rate,
16 overall survival, and patient-reported outcomes.
17 Patients from the standard therapy arm were not
18 allowed to cross over the cilta-cel arm.

19 The primary efficacy and safety results
20 presented today are based on the clinical cutoff
21 date of November 1, 2022, corresponding a median
22 duration of follow-up of 15.9 months and represents

1 the protocol-specified interim analysis of PFS,
2 where approximately 75 percent of the total
3 progression-free survival events have occurred.

4 I will summarize the efficacy analysis plan
5 for CARTITUDE-4. The statistical analysis plan
6 prespecified three interim overall survival
7 analyses. The first interim OS analysis occurred
8 at the time of the primary PFS, and the second OS
9 analysis will occur at the time of the final PFS
10 analysis. The third interim analysis for OS is
11 explained when approximately 200 deaths have
12 occurred. A final OS analysis powered at
13 80 percent will occur when 250 deaths have
14 occurred. The overall type 1 error rate is
15 controlled at two-sided 0.05. Currently, the first
16 interim analysis for overall survival has already
17 occurred. The second, third, and the final OS
18 analysis results are awaited.

19 In the next few slides, I will briefly
20 review the study results. Shown here are the
21 baseline demographics of the study population. The
22 median age of the study population was 61 years,

1 which is younger than the median age of 69 years at
2 diagnosis in the United States. The older
3 population, racial and ethnic minorities, were
4 underrepresented in the study. Only 15 percent of
5 the subjects were enrolled from the North America
6 region. Most subjects enrolled had an equal
7 performance status of 0 or 1. It is important to
8 mention that baseline disease factors that are
9 indicative of poor prognosis, such as high-risk
10 cytogenetics, presence of extramedullary
11 plasmacytoma, and ESS [indiscernible - 2:14:04/ISS]
12 stage 3 were balanced across arms.

13 The majority of the subjects received one or
14 two prior lines of therapy. Only 26 percent of the
15 subjects received a prior anti-CD38 monoclonal
16 antibody and 15 percent of the subjects were
17 triple-class refractory. Only 40 percent of the
18 patients had a high-risk cytogenetic feature. None
19 of the subjects received four or more lines of
20 therapy, the population currently approved to
21 receive cilta-cel. Overall, the study population
22 enrolled in CARTITUDE-4 was not heavily pretreated.

1 I will now describe the primary efficacy
2 analysis. Treatment with cilta-cel is associated
3 with a statistically significant improvement in the
4 PFS per IRC assessment compared to the standard
5 therapy arm, as noted by the applicant. The median
6 PFS was 12 months for the standard therapy arm and
7 it was not reached for the cilta-cel arm at the
8 time of the data cutoff date.

9 I would like to draw your attention to the
10 early part of the Kaplan-Meier curve, which
11 indicates inferior PFS in the cilta-cel arm
12 compared to the standard therapy arm and to the
13 data in the table highlighted by the red box, which
14 indicates that a greater proportion of PFS events
15 in the cilta-cel arm are due to deaths compared to
16 the standard therapy arm. I will discuss this
17 issue in a subsequent part of my presentation.

18 Overall survival was a key secondary
19 endpoint. The first interim OS analysis done at
20 the time of the primary PFS analysis is shown in
21 the slide. Twenty percent of the study population
22 had died at the time of the primary PFS analysis.

1 The results show a lower overall survival in the
2 cilta-cel arm compared to the standard therapy arm
3 that appears to extend to 10 months, with the
4 curves crossing after that. The crossing pattern
5 of the Kaplan-Meier curves for overall survival
6 renders the average hazard ratio not interpretable.
7 There's a significant censoring after the curves
8 cross, indicating that the data are immature. I
9 will discuss the FDA's concerns with the OS-related
10 results in detail later in my presentation.

11 In summary, a statistically significant
12 improvement in median PFS with cilta-cel is
13 observed compared to standard therapy. Median PFS
14 was not reached for cilta-cel compared to 12 months
15 for the standard therapy. We observe a higher
16 proportion of PFS events in the cilta-cel arm are
17 due to deaths compared to the standard therapy arm.
18 There were 17 deaths in the cilta-cel arm versus
19 only 4 deaths in the standard therapy arm, and
20 immature overall survival with 30 percent
21 information fraction, we observe an early OS that
22 remained in the cilta-cel arm with a pattern of

1 crossing of the curves.

2 I will now present a brief overview of
3 safety. Safety was assessed in all subjects who
4 received conforming cilta-cel in the investigation
5 arm, including subjects randomized and treated
6 under the study and those randomized and treated
7 after disease progression. Overall, the rate of
8 grade 4 adverse event was higher in the cilta-cel
9 arm compared to the standard therapy arm. In the
10 safety population, deaths due to adverse events
11 were higher in the cilta-cel arm compared to the
12 standard therapy arm, 11 percent in the cilta-cel
13 arm compared to 8 percent in the standard therapy
14 arm, as is shown in the last row of the table.

15 Cytokine release syndrome, neurotoxicity,
16 HLH/MAS, and secondary malignancies are known
17 safety concerns for cilta-cel. Overall, the rate
18 of grade 3 or higher CRS, neurotoxicity, and
19 HLH/MAS was higher in the cilta-cel arm, as was the
20 rate of grade 3 or higher neutropenia and
21 thrombocytopenia.

22 The overall rate of hematological neoplasm

1 was higher in the cilta-cel arm. At the time of
2 the 120-day safety update, two new cases of
3 myelodysplastic syndrome in the cilta-cel arm were
4 also reported, bringing the number of patients with
5 secondary hematological malignancies to five, with
6 2.6 percent in the cilta-cel arm versus none in the
7 standard therapy arm. The major issue we would
8 like to focus on today is the increased rate of
9 early deaths in the cilta-cel arm compared to the
10 standard therapy arm noted in the CARTITUDE-4
11 trial.

12 Before I review the FDA assessment of the
13 major issue, I would like to briefly highlight the
14 multiple steps between randomization and CAR T cell
15 infusion, although, traditionally, the safety risks
16 due to the treatment are considered in subjects who
17 actually received the treatment. For CAR T cell
18 therapy, the risk associated with administration of
19 CAR T cell therapy is a process. It starts with
20 the risk of leukapheresis, bridging
21 therapy -- which in CARTITUDE-4 consisted of the
22 same choice of regimens as the control arm, either

1 PVD or DPD -- delays in manufacture resulting in
2 adverse clinical outcomes, and toxicity from
3 lymphodepleting regimen. All these risks should be
4 considered integral to the benefit-risk assessment
5 of CAR T cell therapy.

6 Since randomization balances for known and
7 unknown prognostic factors, an assessment of
8 overall survival and safety of randomized patient
9 informs the benefit-risk assessment of any
10 investigational therapy in a randomized clinical
11 trial. Although PFS has been accepted as a primary
12 endpoint and has supported traditional approval in
13 multiple myeloma trials, it's always evaluated at
14 the time of the primary PFS assessment.

15 Particularly for therapies with significant
16 toxicity, assessment of overall survival is
17 important to ensure that there is a favorable
18 benefit-risk assessment.

19 As I mentioned before, the data in
20 CARTITUDE-4 indicated that a greater proportion of
21 PFS events in the cilta-cel arm were due to deaths
22 compared to the standard therapy arm, as shown in

1 the table highlighted by the blue box. The
2 progression-free survival plot shows a crossing
3 hazard pattern as well. FDA conducted additional
4 analyses to evaluate the increased rate of early
5 deaths observed in CARTITUDE-4. FDA analysis
6 indicated an increased rate of death in the
7 cilta-cel arm in the first 10 months
8 post-randomization. As shown in the table,
9 14 percent of the patients in the cilta-cel arm
10 died in the first 10 months compared to 12 percent
11 in the standard arm of therapy. This includes an
12 increased rate of death primarily for adverse
13 events.

14 Due to the increased rate of death in the
15 cilta-cel arm, FDA further analyzed deaths
16 occurring in the first 10 months
17 post-randomization. It is notable that almost
18 5 percent of the patients randomized to the
19 cilta-cel arm died without receiving the intended
20 CAR T cell infusion within 10 months compared to
21 almost none of the standard therapy arm.

22 Although we note the difference in early

1 deaths in patients who did not go on to receive
2 cilta-cel, as I stated previously, these patients
3 started the process to cilta-cel therapy and had
4 received leukapheresis and bridging therapy. These
5 are still relevant in the assessment of the
6 benefit-risk of cilta-cel. Within the treated
7 patients, the rate of deaths from adverse events is
8 higher in the cilta-cel arm in the ITT population,
9 as is highlighted in the last row of this table.

10 Analysis of the patients who died within
11 10 months post-randomization demonstrated that
12 patient attrition occurred at different steps in
13 the process of receiving CAR T cell therapy. This
14 includes patients who were randomized to proceed
15 with leukapheresis and did not receive
16 lymphodepletion; therefore could not proceed to
17 receive cilta-cel infusion.

18 Thirty-two subjects in the cilta-cel arm
19 experienced progressive disease or death prior to
20 receiving the study treatment; however, there is no
21 clear reason for these 32 early progression of
22 disease or deaths. Twelve patients never received

1 cilta-cel, and 10 out of those died within
2 10 months of randomization. Twenty subjects went
3 on to receive cilta-cel as a subsequent therapy
4 after progression and eight died within 10 months
5 of randomization.

6 Since the role of bridging therapy is to
7 stabilize the disease while awaiting product
8 manufacture, we conducted an exploratory analysis
9 of the recipients of bridging therapy in the
10 patients who progressed or died early and compared
11 it to the patients that received cilta-cel. I
12 would like to point out that while the protocol
13 allowed one cycle of bridging therapy, additional
14 cycles could be administered based on patient risk
15 status and cilta-cel availability. Cycle 2 and
16 following cycles of bridging therapy could be
17 truncated to allow for adequate washout
18 [indiscernible - 2:24:14] for the patient.

19 In CARTITUDE-4, investigators selected the
20 optimal bridging therapy from the two
21 protocol-specified regimens based on clinical
22 considerations similar to the standard therapy arm.

1 All the subjects received, and while there were
2 minor differences, the overall bridging therapies
3 in both groups were similar. There are limitations
4 to this analysis, including a small number, and
5 post hoc analysis

6 To further analyze the early dates in
7 CARTITUDE-4, FDA conducted exploratory analysis to
8 assess whether any particular prognostic subgroup
9 was associated with the higher early mortality in
10 the cilta-cel arm. This slide demonstrates that
11 the increased early mortality with cilta-cel was
12 observed across prognostic subgroup and was
13 observed even in the absence of individual poor
14 prognostic factors. The study was not designed to
15 characterize a heterogeneous study population,
16 which may have contributed to a higher early
17 mortality in the cilta-cel arm.

18 Since most of the CAR T cell therapy-related
19 toxicities have onset within 90 days of product
20 infusion, and given the higher early death rate in
21 the cilta-cel arm, we analyzed deaths within
22 90 days of treatment start in the safety population

1 for patients that received conforming cilta-cel or
2 any treatment in the standard therapy arm. The
3 overall death rate for adverse events in the safety
4 population was higher in the cilta-cel arm compared
5 to the standard therapy arm, 11 percent versus
6 8 percent. Similarly, deaths due to adverse events
7 within 90 days of treatment start was higher in the
8 cilta-cel arm compared to the standard therapy arm,
9 4 percent in the cilta-cel arm versus zero in the
10 standard therapy arm.

11 This table shows the cause of death from
12 treatment-emergent adverse events in the safety
13 population in CARTITUDE-4. Overall, the most
14 common cause of death in both arms was infection.
15 In summary, we observe a higher rate of deaths in
16 the first 10 months after randomization in the
17 intent-to-treat population, 14 percent in the
18 cilta-cel arm versus 12 percent in the standard
19 therapy arm.

20 Additionally, there is a higher rate of
21 deaths in the safety population due to adverse
22 events. Similarly, a major difference is observed

1 between the two arms when analyzing death from
2 adverse events within 90 days of treatment start,
3 which was 4 percent in the cilta-cel arm versus
4 zero in the standard therapy arm.

5 Overall survival is the ultimate clinical
6 benefit endpoint because it is not subject to
7 biased assessment and because prolongation of life
8 in the setting of life-threatening and fatal
9 disease is a clinical benefit. OS not only
10 provides an estimate of efficacy but also a safety.
11 Particularly for therapies with significant
12 toxicity, evaluation of overall survival is
13 important to ensure that there is a favorable
14 benefit-risk assessment.

15 During the FDA review period, the applicant
16 provided updated Kaplan-Meier curves based on the
17 clinical cutoff of April 17, 2023 for the 120-day
18 safety update, the figure on the left with the
19 information fraction of 44 percent. Most recently,
20 the applicant provided another overall survival
21 update with a cutoff of December 13, 2023, as shown
22 in the figure on the right with information

1 fraction of 50 percent. Of note, both OS analyses
2 were unplanned and no statistical testing was
3 performed.

4 While there is a further separation of the
5 curves, the OS data is still immature with only
6 50 percent information fraction at the latest
7 unplanned data cutoff. In addition, as we can see
8 from the two Kaplan-Meier curves, for OS in this
9 slide, our major concern regarding the early OS
10 detriment is still evident with longer follow-up of
11 OS data.

12 While CARTITUDE-4 demonstrated a statistical
13 significant effect on PFS and overall response rate
14 in the relapsed/refractory multiple myeloma
15 population enrolled, an increased rate of early
16 deaths was observed as described. Given the higher
17 rate of early deaths in the cilta-cel arm, there is
18 uncertainty if the overall benefit-risk assessment
19 is favorable.

20 I will now invite the statistical reviewer,
21 Dr. Wang, to provide the biostatistical
22 considerations on the OS analysis for CARTITUDE-4.

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FDA Presentation - Cong Wang

DR. WANG: Thank you, Dr. Peredo-Pinto.

Good morning, everyone. I'm Cong Wang, the biostatistical reviewer for the Carvykti application. I'm from the Division of Biostatistics, CBER, FDA. In the next few slides, I will present FDA's biostatistical considerations regarding OS analysis on the CARTITUDE-4 study.

This slide shows FDA's efficacy result on the primary endpoint, PFS, and key secondary endpoint, OS, as discussed earlier in the presentation. The figure on the left shows the Kaplan-Meier curves for PFS per IRC, based on the ITT population. As mentioned by my colleague, Dr. Peredo-Pinto, it shows a statistically significant result with a hazard ratio of 0.41 and p-value less than 0.0001. The figure on the right shows the Kaplan-Meier curves for OS, based on the ITT population, with a data cutoff date of November 1, 2022.

In the presence of a crossing hazards pattern, survival curves occurred at approximately

1 10 months after randomization. A single average
2 hazard ratio across the entire course of a study is
3 not able to accurately capture its overall
4 treatment effects profile at different time points;
5 therefore, it is difficult to interpret, and it can
6 be misleading.

7 We calculated the piecewise hazard ratio of
8 overall survival. The piecewise hazard ratio is
9 1.04 before the crossing time point. There is
10 heavy censoring afterwards, indicating that OS data
11 is immature. Of note, there was a similar crossing
12 hazards pattern in PFS as in OS; however, the
13 crossing occurred much earlier and was followed by
14 a large and sustained PFS benefit.

15 The observed early OS detriment is FDA's
16 major concern. We evaluated the potential causes
17 for the early deaths in the cilta-cel arm. One
18 concern with subjects' specific cell therapy is
19 that subjects may suffer morbidity or mortality
20 while waiting for the product to be available.
21 This may have contributed to the early mortality in
22 the CARTITUDE-4 study in the subjects randomized to

1 the cilta-cel arm. It is also possible that there
2 were product-specific toxicities leading to early
3 deaths. As discussed earlier in the presentation,
4 these subjects started the cilta-cel regimen and
5 had received leukapheresis, bridging therapy, and
6 lymphodepletion.

7 As mentioned by my clinical colleague,
8 Dr. Peredo-Pinto, there were 32 subjects who
9 experienced progressive disease or died prior to
10 receiving the cilta-cel infusion. Among those
11 32 subjects, 20 subjects went on to receive
12 cilta-cel as subsequent therapy after progression.
13 Of those 20 subjects, 10 died as of the data cutoff
14 date. It is difficult to determine which death had
15 cilta-cel toxicity as a contribution factor or for
16 which the delayed administration of cilta-cel was
17 the main cause.

18 Another key question for this application is
19 the duration of the period of increased risk of
20 early death in the cilta-cel arm compared to the
21 standard therapy arm. Because the Kaplan-Meier
22 survival curves cross, a single average hazard

1 ratio does not provide an interpretable estimate of
2 the entire time dependent [indiscernible - 2:33:36]
3 in the effects profile of cilta-cel of overall
4 survival.

5 There was a statistical analysis, such as
6 piecewise hazard ratio assessment, conducted based
7 on selected landmark time points that may provide
8 alternative ways to estimate the treatment effect.
9 For example, presented in this slide is FDA's
10 additional analysis on piecewise hazard ratio
11 assessment based on different time cutoffs. On the
12 top, you can see the piecewise hazard ratio for
13 overall survival was 3 months cutoff, while on the
14 bottom, you can see the piecewise hazard ratio with
15 cutoffs of 5 or 10 months.

16 Based on this assessment, the increased risk
17 of death on the cilta-cel arm goes beyond 3 months
18 after randomization. It appears to persist until
19 at least 5 months and possibly up to 10 months.
20 While an analysis such as this piecewise hazard
21 ratio assessment may provide information to support
22 a benefit-risk assessment, such analysis has

1 limitations. For example, choosing the cutoffs for
2 such approaches retrospectively, based on observed
3 outcomes, limits generalizability of the findings
4 and lacks the clinical or biological rationale,
5 leading to an unreliable estimate that is unlikely
6 to be replicated in future studies.

7 Now, I will turn it back to my clinical
8 colleague, Dr. Peredo-Pinto, for the rest of the
9 presentation. Thank you.

10 **FDA Presentation - Helkha Peredo-Pinto**

11 DR. PEREDO-PINTO: Thank you, Dr. Wang.

12 I will now briefly mention the PRO data
13 presented by the applicant. Because the purpose of
14 a PRO measure is to capture the patient's
15 experience, FDA welcomes the inclusion of PRO data
16 in regulatory submissions. PRO endpoint time to
17 worsening of symptoms in the MySim-Q Total Symptom
18 Score was not formally tested since it follows OS
19 in the statistical hierarchy; therefore, no
20 conclusion can be made. Some of the limitations
21 are infrequent assessment of PROs early in the
22 trial during acute CAR T toxicity, and the

1 longitudinal PRO data does not include the
2 experience of patients with early mortality.

3 In conclusion, the overall survival result
4 from the CARTITUDE-4 study demonstrated a benefit
5 in the PFS and overall response rate in a
6 relapsed/refractory multiple myeloma population who
7 had received 1 to 3 prior lines of therapy and was
8 lenalidomide refractory. An increased rate of
9 early deaths was observed in the cilta-cel arm
10 compared to those randomized to the standard
11 therapy arm. The study was not designed to
12 identify predictive factors for early mortality
13 observed with cilta-cel. The higher rate of early
14 deaths appears to be an inherent risk of autologous
15 CAR T cell therapy. Overall, there is an uncertain
16 benefit-risk of cilta-cel in the proposed proposed
17 population.

18 Please, discuss whether the results of
19 CARTITUDE-4 are sufficient to support a positive
20 risk-benefit assessment of ciltacabtagene
21 autoleucel for the proposed indication. Is the
22 risk of early death associated with ciltacabtagene

1 prerogative, if one exists, and maybe ask the first
2 question of the FDA, and this is in reference to
3 slide 15 and slide 20. You highlight that the
4 primary concern here is early deaths, and I think
5 you display a lot of numbers on slide 15 and 20,
6 and maybe 26 as well, but the statistical focus is
7 really on survival, which isn't necessarily what
8 the FDA has said is their primary interest here.

9 Well, I'll just ask you. Are there
10 statistics that can show us if the numbers of
11 deaths that you guys displayed on slides 15 and 20
12 are indeed statistically significant, or is it just
13 numerical?

14 DR. VERDUN: Hello. This is Nicole Verdun.
15 I'm the CBER Office Director in the Office of
16 Therapeutic Products. I'm going to turn it over to
17 Dr. Peredo-Pinto.

18 DR. PEREDO-PINTO: Thank you for the
19 question. What we are going to try to address with
20 our responses is that the overall survival data is
21 immature; therefore, we cannot conclude a
22 statistical value at this point yet. That's why we

1 mentioned that the maturity of the data is relevant
2 for this situation.

3 DR. MADAN: Right. So just to clarify,
4 though, the differences, then, in deaths that are
5 displayed on slides 15 and 20 are numerical only;
6 correct?

7 DR. PEREDO-PINTO: Yes. Those are
8 numerical, and that's the way that we analyze for
9 the safety of the CARTITUDE-4; yes, correct.

10 DR. MADAN: Okay. Great. Thank you.

11 I think Dr. Spratt will be next.

12 DR. VERDUN: Sorry; one more point of
13 clarification on that. Thank you.

14 DR. FASHOYIN-AJE: Yes. Hi. Good morning.
15 It's Lola Fashoyin-Aje, clinical. I'd also like to
16 add that when we evaluate progression-free
17 survival, we consider the overall survival when it
18 is immature as an endpoint that can contribute to
19 our assessment of safety, and in the context of a
20 safety evaluation, we're not looking for
21 statistical significance. Analysis of safety is
22 typically descriptive. So I just wanted to add

1 that for context. Thank you.

2 DR. MADAN: Thank you.

3 Okay. For our next question, Dr. Spratt.

4 DR. SPRATT: Thank you. Dan Spratt,
5 University Hospitals Seidman Cancer Center and Case
6 Western Reserve University. This is for the FDA.

7 Because you have done this recently for
8 various -- and I won't mention the drugs, but in
9 prostate cancer. There was one in kidney cancer.
10 There are things outside of the oncology space
11 where supplemental sensitivity analysis or
12 restricted mean survival times have been
13 calculated, which usually are never prespecified in
14 studies but has been used when especially
15 non-proportional hazard is met. And I'm somewhat
16 surprised that neither the sponsor or especially
17 the FDA's analysis can show us the RMST difference
18 at 24 to 36 months.

19 Again, I think that's probably a more
20 appropriate way to understand, over that time
21 period, what's the gain or loss in survival time
22 given the focus here. Do you have that calculated?

1 If so, can you please show it? I don't feel I need
2 to hear from the sponsor unless the FDA doesn't
3 have it.

4 DR. VERDUN: Thank you for the question.

5 DR. KANAPURU: Yes. Hi. This is
6 Dr. Kanapuru. I'm the oncology review team lead.
7 No, we did not conduct those analyses, and I would
8 just like to reiterate, as pointed out by
9 Dr. Fashoyin-Aje, a safety analysis, the overall
10 survival is an important safety metric, and all of
11 these analyses are just restricted mean survival.
12 Again, they're generally used when there is a
13 crossover, and they're all considered sensitivity
14 analyses. Here in our analysis, we were looking at
15 the safety based on the observed early overall
16 survival detriment as noted in the KM curves.

17 DR. SPRATT: Then to follow up, again,
18 following up on the chair's comment, because
19 there's numerically superior outcomes, after where
20 the Kaplan-Meier curves cross, it just seems that
21 this would be appropriate, as the FDA has done
22 previously, to show that data so we can better

1 understand because there may be statistical
2 significance -- although I realize this is a
3 sensitivity analysis -- to understand the total
4 restricted mean survival time gain or loss in that
5 duration of follow-up we have, but thank you.

6 DR. SOKOLIC: Thank you, Doctor. It's Rob
7 Sokolic. You're correct, analyses are sensitivity
8 analyses. They're post hoc. They could be the
9 basis of hypotheses, but they're not something upon
10 which we would be able to make a regulatory
11 decision; and that goes with what we're saying,
12 that the data are yet somewhat immature.

13 DR. MADAN: Okay. Thank you.

14 Dr. Spratt, does that address your question?

15 DR. SPRATT: Yes, partially. I wish the
16 analysis was done. The FDA has done that for many
17 other products, so it'd be great if that could be
18 done prior to the decision, but I appreciate their
19 responses. Thank you.

20 DR. MADAN: Thank you, Dr. Spratt.

21 DR. SCHECTER: Sorry. Hi. Jordan Schecter
22 with the sponsor.

1 Dr. Spratt, if you wish us to show the
2 analysis, that's something that the sponsor has
3 prepared, so we are able to show should that be
4 helpful for the committee.

5 DR. SPRATT: If you have that analysis, I
6 would greatly appreciate it, just to be brief.
7 Thank you.

8 DR. SCHECTER: Sure. Let me turn it over to
9 my statistical colleague, Tzu-Min Yeh, to bring us
10 through this data. Thank you.

11 MS. YEH: Hi. It's Tzu-Min Yeh, statistical
12 lead for cilta-cel, Johnson & Johnson. We do have
13 the RMST analysis that I would like to show you.
14 As you said, this is the RMST on the PFS, and the
15 difference in the restricted mean survival time is
16 a gain of 4.7 months in the period up to
17 22.4 months. We also have the restricting mean
18 survival analysis for the overall survival. As
19 said, this is a post hoc sensitivity, and after a
20 follow-up of three years, the difference in the
21 restricting mean survival is a gain of
22 approximately 2.3 months with a confidence interval

1 of 0.1 to 4.5.

2 DR. SPRATT: Thank you. Appreciate it.
3 That addresses my comment.

4 DR. MADAN: Thank you, Dr. Spratt.

5 FDA? Okay, you guys are good.

6 Dr. Vasan, you're next.

7 DR. VASAN: Hi. Neil Vasan, Columbia. I
8 had two broad questions. The first is on the
9 question of is there a subset of patients who are
10 not benefiting? The FDA presented in their
11 analysis, as did the sponsor, that it didn't really
12 seem like there was, but in the FDA briefing
13 document, on page 31, figure 10, where there's a
14 stratification by the prior line of therapy, I
15 wanted to ask the FDA if they had point estimates
16 for the hazard ratio for the patients who had
17 gotten one prior line of therapy versus two or
18 three. It just looks like, on visual inspection,
19 that this is a higher hazard ratio for the patients
20 who had received only one prior line of therapy.

21 DR. VERDUN: Dr. Wang?

22 DR. WANG: Hi. This is Cong Wang,

1 biostatistical reviewer. Thank you for the
2 question. The answer is no, we don't have such
3 hazard ratio estimates because all the subgroup
4 analyses are post hoc and only can be considered as
5 exploratory and post hoc hypothesis generating.
6 Thank you.

7 DR. MADAN: Dr. Vasan?

8 DR. VASAN: The second question has to do
9 with post-progression therapies. This is the FDA
10 briefing document, page 14, table 5. I'm just
11 trying to understand both the balances and the
12 heterogeneities in these post-progression therapies
13 as it impinges on OS. I think there are several
14 issues here.

15 The first is that it seems that more
16 patients on the cilta-cel arm who progressed
17 received post-progression therapies, so I'd like a
18 little bit of guidance on that from both the FDA
19 and the sponsor. And the second, I think this
20 points to the heterogeneity in treatments that
21 Dr. Mailankody described. It's very hard to
22 interpret these different post-progression

1 therapies, given the heterogeneity, and also given
2 the fact that 20 patients in the cilta-cel arm got
3 subsequent cilta-cel who didn't actually receive
4 the drug but they were on the variable arm; and
5 then also noting that the study did not have
6 crossover. I'd like a little more clarity on how
7 to interpret these post-progression data since it
8 impinges on OS.

9 DR. VERDUN: I would like to invite Janssen
10 to answer that question.

11 DR. SCHECTER: Great. Thank you for the
12 question and for the opportunity to present our
13 perspective. I think we first need to look at the
14 overall OS data, which is contained on sponsor
15 slide number 27, which is our most recent data
16 cutoff and shows the hazard ratio for OS of 0.57.

17 Our perspective is that this data, while not
18 fully mature, should be easier to interpret since
19 there was no crossover as part of study design.
20 You asked specifically what the patients got after
21 disease progression. I do have a backup slide,
22 which is PF-29 on the screen here. The 32 subjects

1 who had early progression, 20 of them in the
2 cilta-cel arm, which you could see there, cellular
3 therapy, received cilta-cel.

4 In the standard of care arm at the interim
5 analysis for PFS, there were zero who received
6 cilta-cel, but there were some patients who
7 received other cellular therapies, including
8 ide-cell or investigational CAR Ts with additional
9 data follow-up. As of the 4-month safety update,
10 there were additionally 2 subjects who had
11 cilta-cel in the control arm. But in total, the
12 data for the OS we think is strong and shows a
13 strong hazard ratio for OS at the most recent data
14 cut, December 2023.

15 DR. VASAN: Can you comment also on -- this
16 is FDA briefing document, page 13 in table 4.
17 There were 30 patients in the cilta-cel arm who had
18 progression of disease, and then 117 who got
19 standard therapy, and then of those
20 patients -- this is table 5 -- 43 received one or
21 more subsequent anti-myeloma therapies and 112
22 received the standard therapy, and if you could

1 comment on those ratios.

2 DR. SCHECTER: For table 4?

3 DR. VASAN: I want to make sure I'm
4 interpreting these data correctly. So table 4 says
5 that 30 patients on the cilta-cel arm had
6 progressive disease and 117 on the standard arm.
7 So of those patients, it says 43 subjects received
8 one or more subsequent anti-myeloma therapies, and
9 then 112 subjects received anti-myeloma therapies
10 in the standard therapy arm of those 117. So I'd
11 like a little clarity on what exactly that means.

12 DR. SCHECTER: I could bring up the list of
13 the subsequent therapies that were offered to the
14 patients who had disease progression on the
15 standard of care arm. In addition to cellular
16 therapies, which I mentioned, some patients
17 received novel therapy; patients received standard
18 of care therapy; and patients sometimes went on
19 clinical protocols.

20 So I'm not sure exactly if I'm answering
21 your question, but the subsequent therapy,
22 obviously there were more patients who went on to

1 subsequent therapy in the control group because
2 there's more progression in the control group, as
3 evidenced by the progression-free survival curves.

4 DR. VASAN: I guess the question is, if
5 there are 30 patients who had progressive disease,
6 but then it says 43 subjects with one or more
7 subsequent anti-myeloma therapies in the cilta-cel
8 arm.

9 DR. SCHECTER: Right. I think I could
10 explain this by going back to the CONSORT diagram,
11 which is on slide 21 in the sponsor deck. I think
12 where possible confusion lies is that when patients
13 started bridging therapy, there were 32 patients
14 who developed progression or death before
15 cilta-cel, and 20 of those went on to subsequently
16 receive cilta-cel as kind of a compassionate care
17 and 12 never retreated with cilta-cel. Of the
18 patients who received cilta-cel as study treatment,
19 those 176, there were patients that progressed.
20 They may have progressed a year later, 2 years
21 later, and they may have gone on to subsequent
22 therapy.

1 So there are two separate populations.
2 There are those early progressors who progressed on
3 bridging therapy, and then there are progressors
4 who had cilta-cel as study treatment and progressed
5 well into the future.

6 DR. FASHOYIN-AJE: Permission from the chair
7 to comment, from the FDA?

8 DR. MADAN: Yes. Go ahead

9 DR. FASHOYIN-AJE: Yes. Thank you for all
10 the questions. I think I want to re-emphasize that
11 the purpose of today's meeting isn't really to
12 evaluate the benefit as described by the overall
13 survival as an efficacy endpoint. We're convening
14 this meeting because we have concerns about the
15 rate of early deaths. So in this context, we're
16 evaluating and assessing overall survival as a
17 safety endpoint and as supportive to the main
18 concern around the early deaths in the cilta-cel
19 arm compared to the standard of care arm.

20 That is really the main concern. And while
21 all these additional analyses around
22 post-progression therapies may be interesting, I

1 would like to reorient us back to the main purpose
2 of today's meeting, which is to discuss the high
3 rate of early deaths in the context of the PFS
4 benefit, which is the efficacy endpoint that would
5 support the efficacy assessment in this
6 application. Thank you.

7 DR. VASAN: Thank you. No further
8 questions.

9 DR. MADAN: Okay. Thank you for that
10 guidance.

11 Dr. Nieva is next. Dr. Kwok, you will come
12 thereafter.

13 DR. NIEVA: Hi. Jorge Nieva, University of
14 Southern California. I find the data here very
15 clear that this drug has a great deal of
16 front-loaded risk relative to late benefit, and
17 that's not something new to medicine. We see that
18 in allogeneic transplantations, thoracic surgery;
19 we see it in coronary artery bypass grafting.

20 Has either the FDA or the sponsor done any
21 kind of comparison of the front-loaded risk seen
22 with this product relative to other procedures that

1 are commonly used in medicine that are associated
2 with front-loaded risk? Thank you. That concludes
3 my question.

4 DR. SOKOLIC: I can answer that for FDA.
5 This is Dr. Sokolic. I'm a bone marrow transplant
6 physician, and that's exactly what I said when I
7 saw these curves. This looks like an allogeneic
8 transplant curve. So in allogeneic transplant, we
9 counsel patients. We ask them to accept an upfront
10 burden of increased mortality because we know that,
11 down the line, overall, there's a benefit in
12 survival. So in this setting, we know there's a
13 benefit in PFS. We know there's a safety concern
14 in overall survival upfront. That's not balanced
15 by overall survival balance on the tail end. It
16 may be when the data are more mature, but it's not
17 there yet.

18 Did that help?

19 DR. NIEVA: Yes.

20 DR. MADAN: The sponsor would like to --

21 DR. SCHECTER: Thank you. Thank you for the
22 recognition. I'd like to call up the slide, CO-30,

1 which presents our analysis, and it perhaps
2 presents a counter discussion and a counterargument
3 with the comments that we just heard from
4 Dr. Sokolic.

5 The sponsor and the data show that it's not
6 cilta-cel toxicity. When we looked at different
7 time periods, the only period in time where we see
8 more deaths, those early deaths, are between
9 0 and 3 months with 7 deaths in the experimental
10 arm and one death in the standard of care arm, and
11 six out of seven patients never received cilta-cel.
12 The one last patient received cilta-cel as a
13 subsequent therapy.

14 Every period thereafter, the deaths are
15 either balanced as in the months 3 to 6 or more
16 deaths observed in the standard of care arm. And
17 those deaths are really attributable to three
18 causes: number one, patients who progressed
19 because they didn't get cilta-cel and they didn't
20 have effective bridging; patients who received
21 cilta-cel as subsequent therapy; and third, due to
22 COVID-19. And risks one and two could be mitigated

1 by more effective bridging therapy, and risk
2 number three for COVID-19, we're in a much
3 different period in the pandemic, and the patients
4 that succumb to COVID-19 were not vaccinated, not
5 adequately treated, did not have the supportive
6 care, and of course COVID-19 was much more lethal
7 then. So I would just answer into the record that
8 the data in our assessment do not show that there's
9 a specific cilta-cel toxicity in the early period.

10 DR. MADAN: Thank you.

11 DR. VERDUN: From the FDA, can I please call
12 up Dr. Peredo-Pinto? Thank you.

13 DR. PEREDO-PINTO: Thank you. One might
14 consider that since the subject did not receive
15 cilta-cel, there is no treatment causality;
16 however, it is a consequence of proceeding to
17 receive treatment in the investigation arm. In
18 this case, a CAR T product therefore is relevant to
19 the subject outcome. This brings to light a
20 persistent consideration on the current CAR T
21 treatment pathway in which subjects will die while
22 waiting to receive the product.

1 As it is clearly shown in this study trial,
2 the early OS detriment in the subjects, in the
3 context of an autologous product that requires the
4 subject to go through multiple steps prior to
5 CAR T, is an important determinant of the overall
6 benefit-risk. Early mortality in subjects who die
7 who did not receive cilta-cel raises issues in the
8 subject selection optimal disease control while
9 awaiting CAR T product and manufacturing issues as
10 well. Thank you.

11 DR. SCHECTER: If I may be recognized.

12 DR. MADAN: Yes, this is the heart of
13 issues, so go ahead, but be on point briefly,
14 please.

15 DR. SCHECTER: Sure. To answer the
16 question, I'd like to ask Dr. Irene Ghobrial to
17 provide her comments, specifically about the
18 optimization of bridging, because I think that
19 really could improve the overall profile.

20 Dr. Ghobrial?

21 DR. GHOBRIAL: Absolutely. Thank you so
22 much. So again, I'm not a statistician. I'm a

1 clinician who sits down with patients and tell them
2 whether they are allowed to get cilta-cel or not.
3 And I can tell you that these days, we are giving
4 very different bridging therapy compared to what we
5 had on the CARTITUDE-4 trial, and this is great
6 because we have now options that we did not have
7 before.

8 I believe that the current bridging therapy
9 could potentially optimize our patient care, can
10 improve the way that we treat our patients, and
11 make them capable of getting into the cilta-cel.
12 That's a huge difference because the loss of
13 patients early on was truly because we could not
14 have those patients respond well to therapy, and,
15 unfortunately, myeloma is a very aggressive
16 disease. Even when it is first line of therapy,
17 those patients are refractory to lenalidomide, and
18 sometimes even refractory to everything else, even
19 after the first line.

20 So this is not an indolent disease where we
21 have the option of waiting and giving them other
22 things. This is why they were progressing so fast

1 why we were trying to rescue them with bridging
2 therapy, but we do have better bridging therapies
3 these days.

4 DR. MADAN: Thank you.

5 Okay. I'd like to get to the next question,
6 then, from Dr. Kwok, and, Dr. Gradishar, you're
7 next.

8 DR. KWOK: Thank you. Mary Kwok from
9 University of Washington. I just have a few
10 clarifying questions. I guess the first one is,
11 how were adjunctive therapies used? Was IVIG and
12 things like that mandated in the protocol?

13 DR. SCHECTER: I'm happy to take that
14 question. As per protocol, we had supportive care
15 being suggested: IVIG, prophylactic antibiotics,
16 antivirals, growth factor. This was done at the
17 discretion of the treating physician and also
18 subject to local hospital practice or availability,
19 depending on the region.

20 DR. KWOK: Thank you.

21 I have just a couple other questions. For
22 the patients that went on to progress and

1 subsequently receive cilta-cel, did they receive
2 any therapy in between their progression and
3 cilta-cel, or did they go straight to cilta-cel,
4 meaning did they go into cilta-cel refractory
5 already?

6 DR. SCHECTER: Twenty such patients who
7 received cilta-cel as subsequent therapy,
8 approximately eight received additional therapy
9 between bridging and lymphodepletion cilta-cel.

10 DR. MADAN: Thank you.

11 Dr. Kwok, does that answer your question?

12 DR. KWOK: Yes. Thank you.

13 DR. MADAN: Okay. Thank you.

14 Okay. Thank you.

15 Dr. Gradishar, you're up.

16 DR. GRADISHAR: Bill Gradishar, Northwestern
17 University. I have a question for Dr. Schechter,
18 and it relates to what you talked about a little
19 bit with respect to dose intensity. Do you have
20 more granular information about the people who
21 either had deaths or were progressing? Do we have
22 a better understanding of what fraction of the

1 intended dose intensity of the bridging therapy
2 they actually received? Because there was a
3 clustering of a lot of the COVID cases among that
4 group, and I'm just wondering how much have they
5 actually got, and not the entire group, but
6 specifically those who are having the events.

7 DR. SCHECTER: Yes, absolutely, and this is
8 somewhat of a complicated question, so I'll be
9 brief but hopefully on target. The methodology
10 used, we took all patients who received the
11 bridging therapy. We ranked the patients based on
12 dose intensity, and then we took the lowest
13 25 percent who received pom or bortez. For pom,
14 there were 104 patients in the lower quartile; for
15 bortez, there were 13 patients in the lowest
16 quartile.

17 Looking at the 104 patients within the
18 lowest quartile of pomalidomide, 12 out of 104 had
19 an early PFS event. Looking at the patients who
20 were in the lowest quartile for bortezomib, 7 out
21 of 13 had an early PFS event. So the patients who
22 were in the lowest quartile had twice the rate of

1 early PFS for the pomalidomide, 5 times the rate of
2 early PFS, versus those without this level of dose
3 reduction, and there were twice as many patients in
4 the lower quartile for pom and bortez in the
5 cilta-cel arm.

6 So we're not saying that this is the obvious
7 smoking gun, so to speak, but we do think that
8 there's an association between that lower dose of
9 pomalidomide and bortezomib and the early
10 progression that was seen.

11 DR. GRADISHAR: Thank you.

12 DR. MADAN: Thank you, Dr. Gradishar.

13 Dr. Hunsberger?

14 DR. HUNSBERGER: Yes. Sally Hunsberger. In
15 the curves that were shown -- I think slide CO-27,
16 there are four censored observations in the
17 standard of care arm in the first 3 months, but
18 there's no censoring in the treatment arm. So I'm
19 a little bit worried about that censoring pattern
20 because it's all about those early events. So if
21 there are four early events or censoring in the
22 standard of care arm, that's a lot of numbers

1 compared to the number of deaths. So do we know
2 anything about those events that were censored?

3 DR. SCHECTER: So there were were 4 patients
4 in the standard of care arm that withdrew consent
5 to study participation. There were also 7 subjects
6 who received subsequent anti-myeloma therapy prior
7 to disease progression; so in total, 11 censoring
8 in the standard of care arm.

9 DR. HUNSBERGER: And no censoring in the
10 treatment arm.

11 DR. SCHECTER: That's correct.

12 DR. HUNSBERGER: Okay. Thank you.

13 DR. MADAN: Okay. I think, actually, that
14 completes our questions.

15 Dr. Kwok, I think your hand is up again, so
16 we'll go ahead if you have a question.

17 DR. KWOK: Sorry. I just have one more
18 clarifying question, and this gets back to the
19 comment from the FDA reviewer about the potential
20 delays that might be built into the cilta-cel arm.
21 My first question is, do we know when the
22 progressions happened? Did it happen on therapy or

1 during the delays or breaks, washout period?

2 Then two, I understand the idea of a need
3 for a washout period before leukapheresis in order
4 to preserve T cells and things like that. I don't
5 quite understand the need for a washout period
6 between bridging therapy and initiation of
7 lymphodepletion, so I was just wondering if someone
8 could clarify that. Thank you.

9 DR. SCHECTER: Sure. Perhaps I could take
10 the first question, and then perhaps turn it over
11 to our clinical experts to comment on the second.
12 You had asked about that potential longer
13 vein-to-vein time. There were a lot of
14 complications treating patients during the
15 pandemic, mostly logistical, so what we've looked
16 at is the receipt-to-release timing, so when we
17 received the product here at Janssen, when it was
18 released, and back to the study site.

19 We found that the timing was actually very
20 similar between the patients who had early
21 progression events, patients who had later
22 progression events. The average time off of

1 therapy was essentially zero, so most patients
2 progressed while on bridging therapy. Of those
3 22 patients who had early progression, the
4 majority, 19 out of 22, had progression events
5 within the first 5 weeks. So it's not like they
6 spent an inordinate time off of therapy and they're
7 waiting around for their product. These are
8 progressing on DPD, and we know DPD should have a
9 PFS of about 12 months. Having a PFS of one and a
10 half months or 1.3 months, that's a very high-risk
11 patient. So our conclusion is that the
12 vein-to-vein time or receipt-to-release time did
13 not inordinately contribute to that early
14 progression events.

15 Perhaps I'll ask Dr. Yi Lin from Mayo Clinic
16 to help comment on your second question about why a
17 washout period is so common in CAR T studies,
18 specifically that washout between the bridging
19 therapy and then the start of lymphodepletion.

20 DR. MADAN: That would be great. I just
21 think we should try to keep this brief because we
22 do have to get to a break. We have the OPH session

1 starting at 11:20, so probably a high-level summary
2 here would be good in a minute or less. Thank you.

3 DR. LIN: Yi Lin from Mayo Clinic. On
4 clinical trials, there is often a washout period,
5 from the stop of bridging therapy to start of
6 lymphodepletion chemotherapy, to allow patients to
7 potentially recover from any of the side effects of
8 the bridging therapy and any potential effect of
9 the bridging therapy on the CAR T therapy.

10 We do know in real-world practice that that
11 is certainly not mandatory. We would have more
12 options to consider, patients' overall fitness and
13 status from bridging therapy to the start. So in
14 real-world practice, we do not necessarily mandate
15 a bridging period, and we do have data from
16 real-world practice to show the benefit of the
17 treatment despite the lack of washout period.

18 Thank you.

19 DR. MADAN: Thank you very much.

20 DR. PEREDO-PINTO: FDA would like to
21 clarify.

22 DR. MADAN: A quick point of clarification

1 would be great. Go ahead.

2 DR. PEREDO-PINTO: Thank you. It's the
3 applicant's responsibility to demonstrate or prove
4 that a more adequate bridging therapy has the
5 capacity to prevent the early progression of
6 disease or death. Given that the study stands as a
7 single pivotal trial to support the marketing
8 application and likely the scenario with two
9 confirmatory trials, it represents a challenge for
10 the agency to make a conclusive regulatory decision
11 based solely on a speculative assessment of the
12 benefit-risk profile rather than robust scientific
13 evidence. Thank you very much.

14 DR. MADAN: Okay. Thank you.

15 With respect to Dr. Advani, who's got a
16 question, we'll try to come back to that after the
17 OPH session. I apologize for not getting to that
18 now.

19 We will take a quick 9-minute break, as it
20 stands. Panel members, please remember that there
21 should be no chatting or discussion of the meeting
22 topics with other panel members during the break.

1 We will resume for the open public hearing portion
2 of this session at 11:20. Thank you.

3 (Whereupon, at 11:11 a.m., a recess was
4 taken, and meeting resumed at 11:20 a.m.)

5 **Open Public Hearing**

6 DR. MADAN: We will now begin the open
7 hearing session.

8 Both the FDA and the public believe in a
9 transparent process for information gathering and
10 decision making. To ensure such transparency at
11 the open public hearing session of the advisory
12 committee meeting, FDA believes that it is
13 important to understand the context of an
14 individual's presentation.

15 For this reason, FDA encourages you, the
16 open public hearing speaker, at the beginning of
17 your written or oral comment to advise the
18 committee of any financial relationships that you
19 may have with the applicant. For example, this
20 financial information may include the applicant's
21 payment of your travel, lodging, or other expenses
22 in connection with your participation in the

1 meeting.

2 Likewise, FDA encourages you, at the
3 beginning of your statement, to advise the
4 committee if you do not have any such financial
5 relationships. If you choose not to address this
6 issue of financial relationships at the beginning
7 of the statement, it will not preclude you from
8 speaking.

9 The FDA and this committee place a great
10 importance in the open public hearing process. The
11 insights and comments provided can help the agency
12 and this committee in their consideration of the
13 issues before them.

14 That said, in many instances and for many
15 topics, there will be a variety of opinions. One
16 of our goals for today for this open public hearing
17 is for it to be conducted in a fair and open way,
18 where every participant is listened to carefully
19 and treated with dignity, courtesy, and respect.
20 Therefore, please speak only when recognized by the
21 chair, and we thank you in advance for everyone's
22 participation and staying on time.

1 We do have 10 speakers, so we'll go ahead
2 and get started with speaker number 1. Go ahead.
3 I see you're already on. Please introduce yourself
4 and state your name and any organization you're
5 representing. You will have 3 minutes. Please go
6 ahead.

7 MS. DeROME: Great. Thank you. I have no
8 disclosures. Hello. My name is Mary DeRome, and
9 I'm the Senior Director of Medical Communications
10 and Education at the Multiple Myeloma Research
11 Foundation or MMRF. The MMRF is a national
12 501(c)(3) nonprofit organization and our mission is
13 to accelerate a cure for each and every myeloma
14 patient. We are the number one private funder of
15 myeloma research in the world and have raised over
16 \$600 million in support of this mission over the
17 last 25 years.

18 On behalf of the hundreds of thousands of
19 patients, family members, and friends that the MMRF
20 represents, we would like to express our support
21 for the availability of therapies with a positive
22 risk-benefit ratio to less heavily pretreated

1 patients, particularly these agents that show
2 efficacy in high-risk populations where there is
3 still considerable unmet need.

4 Despite decades of progress, the 5-year
5 survival rate for multiple myeloma patients is
6 still only about 60 percent. Myeloma is a disease
7 of remission and relapse, with some patients
8 cycling rapidly through many lines of therapy until
9 their treatment options are exhausted. Due to the
10 increased use of quad therapy in the upfront
11 setting, many patients arrive at their first
12 relapse already refractory to many effective
13 therapies, and the majority of patients, as we have
14 seen in today's presentations, do not survive to
15 receive 4th or 5th line therapy, which is where
16 many of the newer, most effective therapies are now
17 approved.

18 It is also clear that the more lines of
19 therapy a myeloma patient is exposed to, the more
20 compromised their immune system becomes, making
21 immune therapies less effective. The use of
22 therapies such as CAR T earlier in a patient's

1 disease journey, as shown in the briefing of
2 today's discussion, can lead to higher response
3 rates and rates of MRD negativity, longer
4 progression-free survival, and improved quality of
5 life, as patients do not resume therapy again until
6 they relapse. These significant benefits, however,
7 must be weighed against the risks for short-term
8 adverse effects such as CRS and ICANS, and
9 long-term effects of cytopenias, serious
10 infections, and second primary malignancies.

11 It is our hope that the committee will
12 appreciate that despite the significant progress
13 made in myeloma in the last 20 years, more options
14 are urgently needed. In addition, we encourage the
15 FDA to provide guidance on optimizing bridging
16 therapy for patients eligible for CAR T therapy in
17 earlier lines to maximize disease control and
18 enable patients to achieve the best possible
19 outcome.

20 In conclusion, there remains a significant
21 unmet need for effective therapies for
22 relapsed/refractory myeloma patients, and making

1 more effective therapies earlier in the disease
2 course will help to address that need. Thank you.

3 DR. MADAN: Thank you, speaker number 1.

4 Speaker number 2, please unmute your mic and
5 turn on your webcam. Will speaker number 2 please
6 introduce yourself? Please state your name and any
7 organization for the record. You will also have
8 3 minutes. Thank you.

9 MS. CHMIELEWSKI: Hello. Good morning. My
10 name is Cindy Chmielewski, and I'm a multiple
11 myeloma patient and a research advocate. I am on a
12 number of the patient advisory boards and receive
13 honoraria for the work from various pharmaceutical
14 companies, including J&J, but I am not being
15 compensated for speaking at today's meeting.

16 We all know that myeloma is a disease of
17 relapse and remission. As such, it is a disease of
18 continuous therapy. CAR T is the only treatment
19 now that allows patients to have a break from
20 continuous therapy. I believe it's important to
21 have access to this therapy earlier on in a
22 patient's myeloma journey when they and their

1 T cells are healthier.

2 I attend a lot of medical meetings. Doctors
3 are always talking about T cell health, saying that
4 the healthier your T cells are, the more likely you
5 are to have a longer duration of response.

6 Continuous therapy can exhaust your T cells. It
7 makes sense to me to have this therapy available
8 earlier when T cells are healthier. Wouldn't it be
9 nice if someone in a second or a third line could
10 get access to CAR T therapy and have a deep
11 remission so they wouldn't need another therapy for
12 maybe years? And as we heard today, unfortunately,
13 not every patient will make it to the 4th line of
14 treatment, so why wait?

15 Right now, patients typically have shorter
16 and shorter remissions as they go through
17 successive lines of therapy. These patients live
18 from blood work to blood work. Every lab could be
19 the one that tells them they're out of remission.
20 I know that firsthand, and it makes it hard to live
21 your life and plan for your future. CAR T
22 treatment early on, when T cells are healthier,

1 could change that. A longer treatment-free
2 interval could help you plan ahead.

3 In my case, I have not had Carvykti. Now I
4 am on a monthly maintenance therapy. I am very
5 thankful for that treatment option, but to be
6 honest, it's a pain in my neck. I have to figure
7 out where I'm going to be so I can schedule the
8 next shot. I am tied to a treatment center. If I
9 could have a drug-free period, I would be able to
10 travel for business and pleasure freely and to
11 visit my family more easily. My life would be much
12 less complicated. Making Carvykti available
13 earlier could improve patients' lives.

14 I appreciate this committee's review of this
15 important data, and I want to assure you that
16 whenever I start a new therapy, I always examine
17 the risks and the benefits of the product and how
18 it may affect my future options down the line. I
19 am comfortable doing this with my doctor. What I
20 want are treatment options and the information to
21 be part of that decision-making process over my
22 disease. Thank you very much.

1 DR. MADAN: Thank you, speaker number 2.
2 Speaker number 3, please unmute your mic and
3 turn on your webcam. Will speaker number 3 please
4 introduce yourself? Please state your name and any
5 organization you are representing for the record.
6 You will also have 3 minutes.

7 DR. USMANI: Thank you so much for the
8 opportunity, Mr. Chairperson. My name is Saad
9 Usmani. I'm a myeloma physician who's been
10 treating patients for about 17 years. I have
11 served as an investigator and consultant for
12 Janssen as part of what I do as a researcher, and
13 they are not compensating me for these comments.
14 I'm speaking as a physician taking care of patients
15 every day in clinics.

16 While we've seen an improvement in myeloma
17 outcomes in the last two decades, we know that
18 myeloma is a very heterogeneous disease, and even
19 in patients who are at their first and second
20 relapses, we see a very aggressive nature of
21 disease. A lot of what I've been hearing in the
22 ODAC so far is a testament to that heterogeneity.

1 The clinical trial data, as a
2 [indiscernible - 3:28:54] clinician, I see a
3 therapy that is highly effective, clearly
4 demonstrating PFS benefit and meeting its primary
5 endpoint. The early death events, again, as a
6 [indiscernible - 3:29:04] clinician, are included
7 in those PFS events and also demonstrate how
8 quickly the disease can turn and create challenges
9 for both patients and clinicians.

10 Looking at these data, I do support the
11 notion that this option needs to be there for my
12 patients. Our patients can have discussions with
13 their physicians about the pros and cons of the
14 therapies that they have at hand. They can be well
15 informed and make their decisions for themselves.

16 Based on these data, what I take away is
17 that the cilta-cel therapy is effective when
18 compared to standard of care in this early line of
19 treatment. I did not see any data that shows me
20 that the OS is any worse with cilta-cel; if
21 anything, it may appear similar. And as a
22 clinician and patient advocate, I think that is a

1 discussion that I need to be allowed to have with
2 my patients.

3 We have seen so many examples in clinics of
4 patients cycling through available treatments
5 within months but benefiting tremendously from
6 these therapies and subsequent lines. I'd like to
7 offer that option to my patients who have that
8 aggressive relapse in early lines, who otherwise
9 won't be able to get this therapy. Thank you so
10 much.

11 DR. MADAN: Thank you, speaker number 3.

12 Speaker number 4, please unmute and turn on
13 your webcam. Will speaker number 4 go ahead and
14 introduce yourself? Please state your name and any
15 organization you're possibly representing for the
16 record. You will also have 3 minutes. Thank you.

17 MS. PURI: Hi. Good morning. My name is
18 Aparajita Puri, and I'm going to share the story
19 that me and my father, Ajai Puri, have been through
20 in the past few years with myeloma. Ajai is a
21 patient of myeloma. He was diagnosed in 2021. We
22 speak purely as patients. We're not associated

1 with any organization. Ajai has gone through the
2 Carvykti treatment in May 2022, and we're here to
3 just share our experience.

4 As a family member and as a daughter, we
5 went through a torrid time when Ajai was diagnosed
6 in 2021. He went through a bone marrow transplant,
7 and within a few months of the transplant, the
8 disease had recurred again. He also went through a
9 second-line treatment of KPd, but only to see that
10 the disease had come back once again. And within
11 18 months of diagnosis, we were tearing it apart,
12 which had very few options, and that's when
13 Janssen, and MSK, and Dr. Usmani allowed us a
14 chance at the Carvykti trial, and for us that was a
15 life changer.

16 Ajai went through the treatment in 2022 of
17 May, and almost 2 years down with the Almighty's
18 blessings and all the care that we received, he's
19 doing very, very well. The treatment process was
20 relatively easier than the transplant. I was with
21 him through the process. The only adverse side
22 effect that he continues to live with is the risk

1 of infections, but within a few months, we were
2 able to get him back to his normal life, including
3 getting to work, spending time with family, and
4 honestly going on as he would before he was
5 diagnosed.

6 As a family member and as a daughter, I
7 would only say that this treatment for us has been
8 a blessing, and if we're able to make that choice
9 available for more and more patients for this
10 disease, that is most unpredictable and sometimes
11 in the cases of high-risk patients very quickly
12 takes a dangerous path, this treatment option can
13 give patients another chance at life like it's
14 given us. I'll just let Ajai quickly share his
15 thoughts.

16 MR. PURI: Thank you very much for letting
17 us in for sharing our experience. I had a
18 successful corporate life. I was a COO for Bharti
19 Airtel, the leading telecom operator in India, and
20 in January '21, as Aparajita said, I figured out
21 that I had myeloma, and as Aparajita said, we went
22 through the treatment phase 1, then a bone marrow

1 transplant, and then the third treatment, and then
2 we were fortunate enough to be coming in contact
3 with Dr. Usmani, who's been like a godsend figure
4 for us, and went through the the CAR T transplant.

5 I must say that during the transplant and
6 post-transplant, the experience has been extremely
7 smooth. I would rather risk myself by saying it
8 was better than the stem-cell transplant experience
9 in terms of after effects and in terms of during
10 the treatment effects. I just had one impact,
11 which was a little low blood count and all that,
12 but I think it was very, very well managed in the
13 U.S., and we were there for 3 months
14 post-treatment.

15 Since then, we've come back to India, and
16 I'm completely drug free. That's a blessing. For
17 the last 19 months, I'm completely drug free. I
18 don't take any drugs at all and live a normal life.
19 I'm on boards of a few companies. I --

20 DR. MADAN: That's wonderful. That's
21 really --

22 MR. PURI: Yes. I support some of the

1 government initiatives. I support some of the
2 philanthropic initiatives, so it's been wonderful.
3 I would only urge that a treatment like this, which
4 can be a lifesaver and a game changer, be brought
5 to many more people at a state when it has lesser
6 impact and immunity is strong in the human body,
7 rather than depleting the immunity first by other
8 treatments, and then giving them this life-saving
9 treatment, which could only risk the life a little
10 more. So I would urge that it should be --

11 DR. MADAN: Thank you.

12 MR. PURI: -- opened up globally and across
13 the economic strata. Thank you very much.

14 DR. MADAN: Thank you very much for sharing
15 your story. We have to move on to our next
16 speaker, but we do appreciate your perspectives as
17 a patient. Thank you very much.

18 Our next speaker will be speaker number 5.
19 Will speaker number 5 unmute your mic and turn on
20 your webcam? Please introduce yourself and state
21 the name of any organization you may be
22 representing. You'll have 3 minutes. Speaker

1 number 5, go ahead.

2 DR. SIDANA: Thank you very much for giving
3 me the opportunity to present. I'm Surbhi Sidana.
4 I'm a myeloma physician and researcher at Stanford
5 University. I am an investigator on J&J sponsored
6 trials and do work with them as a consultant, but
7 I'm not being paid for this testimony.

8 I would like to share my experience of
9 treating myeloma patients every day, trying to get
10 them to CAR T, and per the current label, I cannot
11 emphasize how challenging it is to get patients to
12 CAR T from when we think about CAR T to CAR T
13 because our options for bridging therapy by the
14 time the patients are at 5th line are very limited.
15 Given the manufacturing time, patients are often
16 progressing and never make it to CAR T or start
17 CAR T with very high disease burden, which we know
18 is associated with increased risk of side effects.

19 In contrast, I was an investigator on
20 CARTITUDE-4, and I have to say the experience of
21 treating patients early line was completely
22 different. I know there were some patients

1 progressing on bridging therapy on CARTITUDE-4, but
2 when I see my real clinical practice, that is a
3 stark contrast, and I would like to share with you
4 an example of one such patient I had on
5 CARTITUDE-4.

6 He's a young man in his 40s. I saw him for
7 a transplant consult, but he progressed within
8 2 months of starting frontline therapy with
9 bortezomib, lenalidomide, and dexamethasone. We
10 know historically these patients do very poorly.
11 He was randomized to the cilta-cel arm and is in a
12 stringent complete response 3 years later. He's
13 back to work full time, which for him was very
14 important, as he has a young family to support, and
15 he's enjoying an excellent quality of life.

16 So given that we have many more effective
17 bridging options earlier line, there are lots of
18 logistical issues with CAR T where we need more
19 effective bridging options. I would like to urge
20 the panel to consider allowing earlier line use of
21 CAR T given the progression-free survival benefit
22 and improved quality of life with this limited

1 duration treatment. The option whether to use it
2 as 2nd line, 3rd line, or 4th line should be a
3 discussion between the patient and the physician,
4 considering the side effects and the logistics, and
5 the circumstances of each patient. Thank you.

6 DR. MADAN: Thank you, speaker number 5.

7 Speaker number 6, please unmute your mic and
8 turn on your webcam. Please introduce yourself and
9 state your name and any organization you're
10 representing for the record. You will have
11 3 minutes. Thank you.

12 MR. AIELLO: Good morning. My name is Jack
13 Aiello. Regarding any conflict of interest and
14 honoraria, I sit on several pharma myeloma patient
15 advisory councils, including Janssen, BMS,
16 Karyopharm, Genentech, and GSK, but I'm not being
17 compensated for my testimony here, and I'm also on
18 the International Myeloma Foundation's Board of
19 Directors.

20 I was diagnosed with multiple myeloma in
21 early 1995 and given 2 to 3 years to live. As
22 such, I've been fortunate to participate in

1 multiple clinical trials, and I've seen the FDA
2 approve 19 new drugs in the last 21 years for
3 myeloma treatment, resulting in tripling survival
4 rates. Thank you, FDA, investigators, pharma
5 companies, NCI, and patients who have made this
6 happen. However, we still have no cure, and nearly
7 all of these treatments are given until
8 progression, and when a treatment stops working,
9 patients hopefully are immediately moved to another
10 available treatment option. Unfortunately, studies
11 have also shown that responses are typically
12 shorter with each new line of therapy.

13 For the last 20 years, I have facilitated
14 our large San Francisco Bay Area myeloma support
15 group. Last year, I convened a panel of six of our
16 CAR T patients, a mix of folks who received
17 Carvykti or Abecma within trials or commercially.
18 They shared a mix of responses, ranging from
19 4 months and relapsed to 4 years and counting.
20 They experienced different side effects, including
21 CRS and neurotoxicities. But when I asked each of
22 them if they would go through a CAR T again,

1 everyone said yes; and the one reason they all
2 strongly indicated was the opportunity to be off
3 treatment for months or years. Patients get so
4 physically tired from treatment after treatment,
5 that a treatment holiday was incredibly beneficial
6 to feeling better.

7 In so many cases, Carvykti has been shown to
8 work well, resulting in excellent responses. I
9 hope you'll consider giving patients a chance to
10 feel better sooner by approving Carvykti usage
11 rather than waiting until after 4 lines of therapy.
12 This is a difficult disease to battle, and giving
13 patients a chance to stop treatment sooner rather
14 than later would mean a better quality of life.
15 Until you've experienced myeloma treatments, you
16 can't believe how the side effects can wear you
17 down. The benefit of a treatment holiday means so
18 much to patients. Thank you for listening and your
19 consideration of this request.

20 DR. MADAN: Thank you, sir. I appreciate
21 your perspective.

22 I think that brings us to speaker number 7.

1 Will speaker number 7 please unmute and turn on
2 your webcam? Please introduce yourself and state
3 your name, and for the record any organization you
4 are representing. You will also have 3 minutes.
5 Thank you.

6 MR. BIRU: Good morning. My name is Yelak
7 Biru. I serve as President and CEO of the
8 International Myeloma Foundation. I sit before you
9 today as a myeloma patient, a survivor, and an
10 advocate. I was diagnosed at the tender age of 25
11 in 1995, a few months after the previous speaker
12 28 years ago. My journey with multiple myeloma has
13 really been one of ups and downs, requiring
14 resilience, and treatment, and treatment, and
15 retreatment.

16 The International Myeloma Foundation, where
17 I serve as president and CEO, receives funding from
18 various sources, including industry partners like
19 Janssen Biotech. I have not been compensated for
20 expressing my opinion today. My sole motivation is
21 to champion a treatment that can change patients'
22 lives like mine.

1 My role at IMF allows me to hear the voice
2 of hundreds of patients from across the U.S. and
3 global. They yearn for more treatment options at
4 different stages of their journey. They are all
5 aware that no treatment is a magic bullet. Every
6 option comes with its own set of challenges and a
7 potential side effect. Their goal: to find the
8 best outcome with the least side effect, allowing
9 for a better quality of life and bridging the gap
10 to the next treatment until a cure is finally
11 found.

12 Myeloma is really a formidable adversary.
13 It infiltrates our bones, disrupts our immune
14 system, and threatens our very existence. As a
15 patient, I have witnessed firsthand the devastating
16 toll it takes on individuals, families, and
17 communities. We need more treatment options,
18 innovative solutions that can offer a lifeline to
19 those who face this relentless opponent.

20 I'm not just an advocate, I am a beneficiary
21 of Carvykti. Close to 18 months ago, I underwent
22 this transformative therapy. The results were

1 nothing short of remarkable, MRD negative,
2 mass spec negative, M-spike negative, with a clean
3 PET CT sustained over 15 months, approaching
4 18 months. Carvykti allowed me to break free from
5 the cycle of treatment, experience the deepest
6 remission I have known in years, and reclaim my
7 life. It was a second chance, a lifeline that
8 renewed my determination to live fully. The
9 CARTITUDE-4 approach mirrors how autologous
10 stem-cell transplants are used, administered early
11 for maximum impact. Early use of Carvykti had the
12 potential to prevent T-cell function, a crucial
13 element of the immune system for future treatments.

14 In closing, I stand here not just as Yelak
15 Biru, but as a collective voice of patients,
16 caregivers, and advocates. We implore you to
17 consider the evidence, the science, and the human
18 stories behind Carvykti. Approving this therapy is
19 not a mere decision; it is a lifeline, an
20 opportunity to change the trajectory of myeloma.
21 Thank you for your attention, your dedication, and
22 your commitment to advancing medicine.

1 DR. MADAN: Thank you, sir, for sharing your
2 perspective.

3 This brings us to speaker 8. Please unmute
4 and turn on your webcam. Please begin and
5 introduce yourself. Please state your name into
6 the record and any organization you may be
7 representing. You will also have 3 minutes. Thank
8 you.

9 MS. HAUSTEIN: Good morning. My name is Deb
10 Haustein, and I'm actually a retired oncology
11 nurse. I live in a beautiful little town along the
12 St. Croix River in Hudson, Wisconsin. I'm thankful
13 for the time to share my story with Carvykti. I'm
14 speaking on my own behalf, and I'm not being
15 compensated for my testimony.

16 I was diagnosed with multiple myeloma in
17 2014 and went through the usual Revlimid/
18 dexamethasone regimen, followed by an autologous
19 stem-cell transplant. I had a poor response to
20 this transplant, and after only a few months was
21 back on treatment. It was then 2015, and I was on
22 one treatment after another, from then until May of

1 2020, when I was offered a CAR T therapy with
2 Carvykti. In total, I received seven different
3 lines of treatment in six years.

4 I feel strongly that it is important to
5 approve Carvykti sooner instead of later, waiting
6 for patients to go through 4, 5, or 6 lines of
7 treatment, or even seven, as in my case. I
8 received my CAR T therapy with Carvykti 2 years
9 ago. It was successful, and I am still in
10 remission today. This is the longest I have been
11 in remission since being diagnosed. It is the
12 longest I have gone without needing some type of
13 treatment, without being totally impacted by
14 constant fatigue, frequent treatments, numerous
15 daily medications, constant medical appointments
16 and tests, and side effects. I am in remission
17 because of Carvykti.

18 But it is more than that. It has given me a
19 normal life again. I'm not wearing rose-colored
20 glasses by any means. I know there might be a day
21 in the future when myeloma will come back, but that
22 day is not today, and hasn't been for 2 years of

1 today, and counting. It feels really good to not
2 wake up every morning knowing that I have cancer.
3 I feel like I can take a deep breath again. I can
4 now make plans with my husband, children, and
5 grandchildren.

6 I can actually plan vacations. I can even
7 book a European river cruise without having to look
8 at my calendar for appointments and treatment dates
9 that might interfere with these plans. I can plan
10 things. What a great way to celebrate. I feel
11 normal and have a normal life again. Cancer
12 patients will understand how important that is to
13 feel normal.

14 Thank you for your time and for letting me
15 share my story and why I believe the benefits of
16 this treatment outweigh the risks.

17 DR. MADAN: Thank you for your story and
18 sharing that with us.

19 Speaker number 9, please unmute and turn on
20 your webcam. Please begin and introduce yourself
21 and any organization you are representing into the
22 record. You will have 3 minutes. Thank you.

1 MS. AHLSTROM: My name is Jenny Ahlstrom,
2 and I'm the founder and CEO of HealthTree
3 Foundation, a patient advocacy organization
4 supporting multiple myeloma. More importantly, I'm
5 a multiple myeloma patient who was diagnosed in
6 2010. As a disclosure, I participate on many
7 former patient ad boards, including
8 Johnson & Johnson's, and Health Tree receives
9 funding support from many companies, including
10 Johnson & Johnson, but I'm not being paid for my
11 testimony today.

12 When I started therapy at the age of 43, I
13 looked for something that was a one-and-done
14 approach that would allow me to take care of my six
15 young children without constantly being on therapy
16 over many years. I chose tandem transplants, and
17 it turned out to be one of my best decisions. For
18 almost 10 years, I was off all therapy and able to
19 be an advocate for others. About six years after
20 that treatment, however, my myeloma did begin
21 relapsing, but it was slow growing, and I had
22 sufficient time to make a decision about my next

1 major therapy while doing what was needed to manage
2 my disease. This time my strategy was, once again,
3 to look for a one-and-done approach.

4 I've spent the last many years understanding
5 the science of myeloma in order to serve my myeloma
6 peers. After a decade of study, consults with
7 experts, and careful consideration, I decided I
8 wanted to receive CAR T therapy, and Carvykti in
9 particular because of the impressive data. What I
10 consider miraculous is that I qualified for and was
11 able to join the CARTITUDE-4 study testing this
12 CAR T in earlier lines of therapy with the help of
13 my doctor, Doug Sborov.

14 The trial was opened in my hometown, and I
15 was fortunately randomized into the treatment arm.
16 In November 2021, I received Carvykti in that
17 trial. I had grade 1 CRS and no ICANS. I'm still
18 MRD negative after 2 and a half years and hope that
19 will continue for many more. For me, it was a
20 fabulous, effective, and safe approach. The timing
21 of this strategy was important in my decision. I
22 chose it because it would be more effective when my

1 immune system was stronger. I chose it because my
2 disease is not yet highly aggressive. I chose it
3 because I believe it is one critical step on a
4 curative path for my multiple myeloma.

5 Like other myeloma patients, I'm not
6 comparing it equally against standard of care
7 options; I'm looking at it strategically. When is
8 a patient's immune system stronger so its
9 immunotherapy has more utility? It's in earlier
10 lines. When is a patient's disease less aggressive
11 and lower risk? It's in earlier lines. Our
12 standard of care options today are not curing
13 patients and they place wear and tear on the immune
14 system, making immunotherapies weaker in later
15 lines of treatment. New approaches are critically
16 needed.

17 To sit in last year's spring ASCO session in
18 person to hear the data readout for CARTITUDE-4 was
19 a memory I won't forget. May other patients be so
20 fortunate. I highly recommend you approve this
21 therapy for patients in earlier lines to open new
22 doors of hope to myeloma patients in the United

1 States. Thank you for your consideration.

2 DR. MADAN: Thank you for sharing your
3 story.

4 Speaker number 10, please unmute and turn on
5 your webcam. Please begin and introduce yourself,
6 and state into the record your name and any
7 organization you may be representing. You will
8 have 3 minutes. Thank you.

9 MR. KELLER: Hello. My name is Doug Keller,
10 and I've been a multiple myeloma patient for
11 12 years. I'm representing myself and have not
12 been compensated in any form for speaking today.
13 My main message today is that, currently, multiple
14 myeloma patients must go through years of
15 debilitating treatments before they can get
16 Carvykti.

17 As is the case for many myeloma patients, I
18 had a bone lesion that caused a broken bone when I
19 fell. After surgery and radiation, I had induction
20 therapy, a stem-cell transplant, and lenalidomide
21 maintenance. Over the next 8 years, I was on a
22 series of treatments that included elotuzumab,

1 daratumumab, lenalidomide, pomalidomide,
2 carfilzomib, dexamethasone, and various
3 combinations thereof, a clinical trial and a second
4 stem-cell transplant, all without achieving
5 remission.

6 I had constant trips to the clinic for blood
7 work and never more than 2 weeks between
8 treatments. My quality of life during this time
9 was only fair. I suffered from sleep disturbances;
10 rashes; cardiac abnormalities; peripheral
11 neuropathy; fatigue; neutropenia; and the anxiety
12 of the cancer burden. My condition also affected
13 the lives of my caregiver and family.

14 In early 2022, I was able to get a slot for
15 Carvykti. At that point, my serum light chain
16 level was very high at 10,500 milligrams per liter.
17 I had Carvykti at the end of May, and one month
18 later, my serum light chains were 3 milligrams per
19 liter. I've been in remission ever since, with few
20 of the side effects of previous treatments, and my
21 quality of life is excellent.

22 I think what is not well recognized by FDA

1 and the medical community is the often debilitating
2 nature of the standard of care treatments that are
3 available to myeloma patients. According to a 2022
4 HealthTree Cure Hub study, even the successful quad
5 induction therapy comes with a high level of side
6 effects, including fatigue, neuropathy,
7 neutropenia, anemia, bone pain, and GI effects.
8 While overall survival is important, myeloma
9 patients don't want to simply survive, they want to
10 live a full life.

11 The response rates of the standard of care
12 treatments are not as good as Carvykti's. Carvykti
13 can give the patient significant time off without
14 treatments and has a better side effect profile
15 than standard of care. Having Carvykti as a
16 5th line treatment or later is not in the best
17 interest of patients who suffer from years of
18 debilitating treatments before they can get their
19 potential for relief. Carvykti can cause serious
20 AEs, but they're usually temporary in contrast to
21 the standard of care. Patients deserve to have the
22 opportunity to make an informed choice about the

1 use of Carvykti early in the course of a disease
2 that has no cure. Thank you for your time.

3 **Clarifying Questions (continued)**

4 DR. MADAN: Thank you for your perspective,
5 sir.

6 So with that, the open public hearing
7 portion of this meeting has now concluded, and we
8 will no longer take comments from the audience.
9 What I'd like to do now, I know we're right at
10 schedule, maybe a little bit behind, but I did
11 promise Dr. Advani that she may ask her question
12 that was a holdover from our earlier session of
13 clarifying questions. I'd like that to be the
14 final question, and then we can move on to our
15 discussion questions.

16 Dr. Advani, I see you up there. Please go
17 ahead with your question.

18 DR. ADVANI: Thank you. Ranjana Advani from
19 Stanford. Since most of the deaths were people who
20 didn't get to the product, you've clumped
21 patients -- this is for the sponsor -- one prior
22 line, and then two, and three have been clumped

1 together. Was there any difference between those
2 who had one, versus two, versus three? Then the
3 second question is, was the PFS different between
4 one, versus two, versus three?

5 DR. SCHECTER: Okay. Thank you for the
6 question. To paraphrase, you're interested in the
7 the aspect of the patients who had one prior line
8 of therapy. Before we take a look at the subgroup,
9 I would like to review again slide 22, which has
10 the overall patient population of patients with
11 1 to 3 prior lines, showing that the primary
12 endpoint was met with a statistically significant
13 hazard ratio of either 0.4 for the unweighted or
14 the 0.26 for the weighted.

15 The subgroups were analyzed. We did look at
16 this in slide 23, if we could bring it up. In the
17 one prior line subset, you can see there on the
18 left-hand side of the screen, sort of two-thirds of
19 the way down, a statistically significant hazard
20 ratio for PFS, which does not cross 1, which is
21 significant. If we look at the similar data for
22 OS, we could see the same performance of that one

1 prior line setting. If we could look at the OS
2 across subgroups on slide 28, you can see in the
3 one prior line subgroup, again, the hazard ratio
4 for OS in favor of the cilta-cel arm versus
5 standard of care.

6 Our study was not powered specifically to
7 look at that one prior line subgroup. We had about
8 a third of patients who received exactly one prior
9 line, so any differences between the performance of
10 the one prior line, two to three prior line, is
11 hypothesis generating at best, and therefore is not
12 something we could base firm conclusions on whether
13 there's better effect on the one prior line versus
14 two to three.

15 What I can say, though, is if we look at the
16 1 to 3 prior line in totality, the CART-4 study,
17 compared to the CARTITUDE-1 study, we do get a hint
18 at a better response rate, better durability,
19 perhaps, but also equally important, if not more
20 so, better safety. So the adverse events of
21 special interests that are attributable to
22 cilta-cel are better.

1 This was a slide that was shown
2 previously -- sorry; the adverse event slide.
3 Well, I'll just speak to it in the interest of
4 time. The incidence of cytokine release syndrome,
5 the incidence of ICANS, the incidence of MNT, the
6 the Parkinsonism syndrome, all better tolerated in
7 the 1 to 3 prior line setting as in CARTITUDE-4
8 than the later line setting in CARTITUDE-1.

9 DR. ADVANI: Also, people who didn't make it
10 to the product, were they mainly those who had one
11 prior, two prior, or three prior?

12 DR. SCHECTER: Right. So I think you're
13 specifically asking about the -- is it the
14 32 patients --

15 DR. ADVANI: Yes.

16 DR. SCHECTER: -- who had disease
17 progression? Certainly.

18 DR. ADVANI: Prior to starting cilta-cel.

19 DR. SCHECTER: Right. I could bring this
20 up. This is PF-34. On the light blue column all
21 the way on the right, you can see the demographic
22 factors of those patients, those 32 who had early

1 disease progression, and it's not as if they're
2 only in stage 3 or only in stage 2. You can see
3 that the demographic factors are very similar to
4 the entire patient population, which is the dark
5 blue column, the 208. So we actually agree with
6 the FDA assessment that was discussed in their
7 slide deck, that there are not demographic factors
8 or other variables that we could identify at study
9 baseline that would identify those patients for
10 early risk of progression.

11 DR. ADVANI: Thank you.

12 DR. VERDUN: I would like to request the
13 chair if FDA can also respond?

14 DR. MADAN: Yes, that would be fine.

15 DR. VERDUN: Thank you.

16 Dr. Wang?

17 DR. WANG: Thank you. This is Cong Wang,
18 biostats reviewer. I just would like to highlight
19 that there are important limitations for the forest
20 plot for both the OS and PFS. First, the hazard
21 ratio assessment within each subgroup was
22 calculated based on unstratified log rank test,

1 ignoring all the stratification factors, and
2 second, based on FDA's exploratory subgroup
3 analysis, in the presence of a crossing hazard
4 pattern or a prolonged overlapping hazard pattern,
5 in the Kaplan-Meier curves for most subgroups, the
6 average hazard ratio reported within each subgroup
7 is unreliable and uninterpretable. So we would
8 like to please ask the committee to interpret the
9 first plot for both PFS and OS for subgroup
10 analysis with caution. Thank you.

11 **Questions to the Committee and Discussion**

12 DR. MADAN: Okay. Thank you. That will end
13 the clarifying question portion of our discussion,
14 and the committee will now turn its attention to
15 the task at hand, the careful consideration of the
16 data before the committee, as well as the public
17 comments.

18 We will now proceed with the questions to
19 the committee and panel discussions. I would like
20 to remind public observers that while the meeting
21 is open for public observation, public attendees
22 may not participate, except at the specific request

1 of the panel. After I read each question, we will
2 pause for any questions or comments concerning
3 wording. We will proceed with our first question,
4 which is a discussion question, and we see it
5 displayed here, and I will read this.

6 Discuss whether the results of CARTITUDE-4
7 are sufficient to support a positive risk-benefit
8 assessment of cilta-cel for the proposed
9 indication. I will ask the committee now, the
10 panel, as we embark on our discussion, if there are
11 any questions concerning the wording of the
12 question or requests for clarity from the FDA
13 before we proceed with our discussion.

14 (No response.)

15 DR. MADAN: Okay. I'm not really seeing any
16 requests for clarification, so I think we
17 understand. I would just like to say that
18 oftentimes during the discussions, we start talking
19 about endpoints or conversations with the FDA,
20 other approved agents, FDA approval. I think we
21 just have to remember that the focus of this
22 discussion is actually the questions before us.

1 The question here is clearly asking about the
2 risk-benefit assessment of cilta-cel, so if we can
3 keep it on point with that, that would be great.

4 I would like to open the floor for any
5 comments, or in the absence of any lead-off
6 comments, I would like to lead into the expertise
7 of our invited panel members, who probably deal
8 more with multiple myeloma than many of us on this
9 panel. That would be Dr. Kwok and Dr. Lattimore,
10 so if one of you would like to volunteer to give us
11 your thoughts on this specific question at hand.

12 Dr. Kwok, I saw your camera come on, so by
13 all means.

14 DR. KWOK: Thank you. I'm happy to weigh
15 in. Actually, a lot of the testimony that we heard
16 from people who treat myeloma and the patients of
17 myeloma echo also my personal --

18 DR. MADAN: Dr. Kwok, just for procedure,
19 just state your name and your institution.

20 DR. KWOK: Sorry. My name is Mary Kwok.
21 I'm from the University of Washington. I actually
22 also had very similar thoughts as -- I forgot his

1 name, but the person who said he was a BMT
2 physician; that the curves really remind me a lot
3 of transplant-associated toxicities and things like
4 that are high early on, and a lot of the thoughts
5 on disease heterogeneity, rapid relapse of disease,
6 and things like that, really, really echo what I
7 also see in my practice.

8 I think that the treatment option, bringing
9 Carvykti or CAR T cell cell early on is an
10 important consideration for a variety of reasons
11 that were already stated; one, that it's an
12 effective therapy. Sometimes it takes a lot of
13 creativity to get to 4 lines of therapy and
14 sometimes giving therapies that you think might not
15 be very effective.

16 I also recognize the importance of a
17 one-and-done treatment. I practice in Washington
18 State, where I see patients who come to us from
19 outlying states where they might not have access to
20 clinical trials or more intensive myeloma
21 therapies. They come to us from Alaska, or
22 Montana, or Idaho, or wherever, and to be able to

1 give a one-time treatment without requiring them to
2 come back and forth is a really important treatment
3 option.

4 I think it's interesting -- and I'm just
5 trying to reconcile in my head why there would be a
6 difference in the initial overall survival when the
7 patients were given the same treatments. I wonder
8 if it's just kind of bad luck or if there's a more
9 scientific explanation, but I think that beyond
10 that, the separation of the survival curves is
11 really striking and impressive to me.

12 DR. MADAN: Dr. Kwok, I think you brought up
13 an interesting point, and it's not been probably
14 touched on a lot. But is it true that multiple
15 myeloma patients who face autologous transplant
16 early on also face a mortality risk, and how would
17 you characterize that risk in the context of what
18 we're seeing here?

19 DR. KWOK: I would say the risk associated
20 with autologous stem-cell transplant, it's very,
21 very low, like probably close to 1 percent, but
22 it's not zero. Then we know from studies, like the

1 DETERMINATION study, that there's a significant
2 quality-of-life decrease that goes on during a
3 period of stem-cell transplant because of
4 toxicities related to intensity of therapy,
5 cytopenias, et cetera. So conceptually, I think
6 toxicities that go into a cell therapy, like
7 receiving CAR T cell, where you're getting
8 lymphodepletion, we know that you're going to have
9 cytopenias and infections, and it seems inherent in
10 the design of the study that that would happen, but
11 if you can get past that, the long-term benefit
12 pays off.

13 DR. MADAN: Thank you.

14 Dr. Lattimore -- and Dr. Advani -- is also a
15 hematology expert here on this panel. Would either
16 of you like to weigh in specifically on this
17 question, of the CARTITUDE data and how it is able
18 to support, or not, a risk-benefit assessment?

19 MS. LATTIMORE: Yes. I'm Susan Lattimore.
20 I just want to be clear that I'm here as a consumer
21 representative on this panel.

22 DR. MADAN: Oh, okay. My apology.

1 MS. LATTIMORE: That's my role on this
2 committee. But I do want to say, in lifting
3 Dr. Kwok's comments, I think we can't understate
4 the ability of individuals who have this period of
5 non-treatment that allows them higher quality of
6 life, which the data did support, and moving into
7 more of a disease-free state. I think that,
8 certainly, there's some confounding data around
9 outcomes, but I think there is some disclosure from
10 a patient perspective that allows those discussions
11 to really be lifted in a treating physician and a
12 patient realm. That also allows the opportunity
13 for people to have more ability to have choice in
14 treatment, and then certainly have that choice
15 earlier on where quality of life may be
16 overwhelmingly improved, but also the opportunity
17 for a higher quality of life to be available to
18 begin with. I don't think that that could be
19 understated.

20 I do think it's difficult supporting a
21 positive risk-benefit assessment. Some of the
22 data, again, from a patient perspective, might be

1 very challenging to understand and interpret. So
2 we think that if the committee can come to -- or if
3 some labeling could come to the opportunity to be
4 overtly transparent about what that risk-benefit
5 looks like and entails in more lay terms, I think
6 it would allow for more opportunity of choice on a
7 patient perspective.

8 DR. MADAN: The chair recognizes Dr. Vasan.

9 DR. VASAN: Neil Vasan, Columbia. I think
10 that this comparison to transplant, I think,
11 metaphorically is powerful and relevant for this
12 patient population. I guess I would just add, and
13 wanted to get Dr. Kwok's thoughts on this, that,
14 obviously, with transplant, we do have risk
15 stratification factors as to who is a better
16 candidate than others, age, and other molecular
17 factors and whatnot. Here, the discussion has
18 really focused on the fact that there really isn't
19 a stratification factor we can point to, to
20 identify the patients who would not benefit.

21 So I wanted to ask if you could comment on,
22 given the heavy censoring, if this longer term

1 follow-up may sway that decision also.

2 DR. KWOK: Thanks for the question, but I'm
3 not sure that I'm the best person to answer this.
4 I will just say that, in general, when we think of
5 stem-cell transplant, we use age and performance
6 status probably as our biggest cutoffs in
7 determining eligibility. That doesn't exactly
8 exist for CAR T. I mean, yes, you consider
9 performance status, but the oldest patient I think
10 on this study was 78, and in other types of CAR T
11 cell therapies, we've heard of people getting it in
12 their 80s and things like that. I would wonder if
13 there's more data in this setting, but I don't know
14 that I would take it off the table necessarily for
15 someone purely based on an age cutoff or something
16 like that.

17 If I could say something about age, people
18 are living longer and longer with myeloma these
19 days. If there is a consideration that things like
20 maybe age or other comorbidities will play a role
21 into whether or not they can get CAR T cell, it
22 makes me wonder if somebody is diagnosed, say, at

1 age 69, the average age, and then they get 6 years
2 out of their initial therapy, and then they get
3 another 2 years or 3 years out of the next
4 subsequent lines of therapy, by the time they are
5 4th line therapy, currently FDA approved, they're
6 quite elderly and may have more comorbidities and
7 things like that. And I wonder if things like that
8 contribute to whether or not somebody can tolerate
9 something like CAR T.

10 So I think thinking about bringing it
11 earlier on certainly makes these types of options
12 available to people, although to answer your
13 question directly, I'm not sure that there are
14 strong cutoffs in terms of who we would necessarily
15 give it to or not. We think about things like
16 kidney and what's appropriate for someone with
17 chronic kidney disease, or maybe end-stage renal
18 disease, which is not uncommon in myeloma, and
19 whether or not somebody can tolerate the cytokine
20 release syndrome that comes on early on. I think
21 these are interesting questions; I just don't
22 exactly have the answer to them.

1 DR. MADAN: Just to follow up a little bit
2 on your answer -- this is Ravi Madan, NCI -- would
3 you say that age is a harder cutoff for a
4 transplant than it would be for this type of agent?
5 Is that what I heard you say?

6 DR. KWOK: I think so. We draw a line in
7 the sand. I think because there are a lot of
8 clinical trials looking at autologous stem-cell
9 transplant, in Europe it tends to be a little bit
10 on the younger side, like 65 or 70, and in the
11 U.S., we push it a little bit more, 70-75. It's
12 like a physiologic age, but usually it corresponds
13 well because the risk for transplant-related
14 mortality and stuff like that increases.

15 I don't know if that kind of data exactly
16 exists with CAR T cell. Clearly, they were not
17 excluded from this clinical trial for age, so I
18 think it's an important option, regardless of age,
19 if somebody's able to receive the treatment.

20 DR. MADAN: Okay. Great.

21 DR. VASAN: Neil Vasan, Columbia. The point
22 I was trying to make was that it's an interesting

1 metaphor, and I think that there are a lot of
2 similarities, but it does seem like one difference
3 is the fact that, with transplant, we have decades
4 and decades of experience. We have very mature
5 stratification factors for whom may or may not be a
6 great candidate, and I think with CAR T cells, we
7 have less of that, just given that these are new
8 therapies. Thank you.

9 DR. MADAN: Thank you.

10 Dr. Frenkl, I see your hand's up.

11 DR. FRENKL: Yes. I have a question maybe
12 back to Dr. Vasan, just to understand his
13 perspective a little bit more on this, because when
14 I am interpreting the data, for me, for the
15 patients who receive it, to me, they have a very
16 clear benefit based on the PFS and the trending OS.

17 So I'm wondering when you're thinking about
18 stratification, are you thinking about people who
19 can make it to the therapy or are you actually
20 thinking about it for the patients on therapy?
21 Because for me, when I look at this study, it's
22 really the maintenance of the patients during

1 bridging that is critically important and maybe
2 something that requires more transparency in
3 education, or that we need to allow the physician
4 and patient to decide what's best for them, based
5 on the heterogeneity of the population and also the
6 emerging treatment landscape.

7 So my question is, are you talking about up
8 until bridging or after with this specific drug?

9 DR. VASAN: Yes, I guess both, and also if
10 longer follow-up, given that the information
11 fraction was lower -- I think it was about a third
12 on this interim analysis. That was my question to
13 Dr. Kwok, so I guess I'm answering your question
14 with a question as well; if longer term follow-up
15 would shed light on these separations.

16 I guess to answer your question, Dr. Frenkl,
17 I think that for those patients who are not
18 receiving therapy, I guess the question is just to
19 what extent does that confound the data, and I
20 think we've seen a lot of subanalyses, sensitivity
21 analyses, that have pointed to what that is.

22 DR. FRENKL: Thank you.

1 DR. MADAN: Great.

2 DR. FRENKL: May I make one more comment?

3 DR. MADAN: Go ahead, Dr. Frenkl.

4 DR. FRENKL: I'm sorry. Thank you.

5 I'll just say that I think with the OS
6 curve, the crossing of the OS curves is not going
7 to change; that has long passed. But we could
8 continue to see further separation or lowering of
9 that with continued follow-up, but the crossing's
10 done, based on the timing of the study.

11 DR. MADAN: Yes. It does seem in the early
12 stages.

13 DR. FRENKL: Yes. Thank you.

14 DR. MADAN: Dr. Advani, I wanted to give you
15 an opportunity to weigh in as more of a heme
16 malignancy specialist. Did you have any thoughts
17 you want to add to this question, specifically?

18 DR. ADVANI: I think it's a difficult
19 comparison because we have a lot of experience with
20 transplant --

21 DR. MADAN: I mean, you can answer that
22 question if you like, but I just meant the FDA

1 question about the data and how it supports a
2 positive risk-benefit assessment, not
3 necessarily -- if you want to talk about the
4 transplant, you can as well, but I meant more
5 the -- either one, quite frankly. Go ahead.

6 DR. ADVANI: I don't have questions on this
7 right now. I'd just like to clarify better. It's
8 a little gray area because we're referring to those
9 32 patients who didn't make it, predominantly,
10 because otherwise, there looks great, and there's
11 no stratification factor, which came across as
12 helping us understand who those patients were
13 compared to the rest of the population. So I don't
14 know how to think of it any differently.

15 DR. MADAN: Okay. Yes, and we'll get to the
16 early events with the second question that we have
17 for discussion here today.

18 Does anybody else have any additional
19 comments? I think Dr. Frenkl did bring up the
20 point that it probably isn't said, but the curves
21 have crossed, and that was in the past, and we have
22 seen that with immunotherapy trials sometimes in

1 the past.

2 Dr. Nieva?

3 DR. NIEVA. Yes. I just want to add that
4 part of this issue of the start-up time is somewhat
5 going to be ameliorated when it leaves the clinical
6 trial setting because we have consent processes and
7 an authorization process. We've looked at how long
8 it takes to get people started up on clinical
9 trials, and it does add about 30 days. And for
10 these patients, that 30 days may actually have
11 been --

12 DR. MADAN: Dr. Nieva, I'll just ask you to
13 hold this thought, and you'll be the first one to
14 talk in the second question because the second
15 question actually focuses on the risk of early
16 death; so that's actually a great way to kick off
17 that.

18 But do we have any other discussion points
19 specifically on discussion question number 1 here?

20 (No response.)

21 DR. MADAN: I think just to summarize this
22 discussion, there is a sense that there is benefit.

1 There are risks here to this population, but in
2 some ways, somewhat modulated, their risks are a
3 little bit similar in some ways to the risks of
4 transplant that this population has faced before.

5 Something that's lost in the curves but
6 really came out in the discussion, not just amongst
7 the panel but also the patients, is the
8 progression-free survival is really also like a
9 freedom of treatment, and these patients are
10 liberated from therapy as well, and I think that
11 was something that resonated with the panel
12 discussion here, that some of the benefit here is
13 indeed being able to get a therapy, and then kind
14 of coast for a while.

15 I do think that the risk component will take
16 on another discussion component here as we get to
17 the second discussion question, which we will now
18 move on to that, which talks about the early
19 deaths, and I think that's kind of where the risk
20 has been highlighted.

21 So here is the discussion question that's
22 now displayed. I think at this time, we will not

1 be taking any comments from the sponsor. This is
2 the discussion point for the panel here, again, and
3 the question is, is the risk of early death
4 associated with cilta-cel treatment acceptable in
5 the context of the PFS benefit?

6 Before we move on to this, are there any
7 requests for clarifications from the FDA on this
8 question? And again, the discussion here is really
9 to focus on the early deaths that were seen on
10 this, as the question is asking us to focus on, in
11 in the context of what was seen later in the trial.
12 So any questions for clarifications from the FDA?

13 Okay. I think those two hands that I see
14 were up before my request for questions, so please
15 let me know if that's incorrect. No? Okay.

16 So with respect to Dr. Nieva, who I somewhat
17 rudely cut off earlier, and I apologize, sir, but I
18 will allow you to kick off this discussion with the
19 points that you were making, which I think are very
20 relevant to this question, so please go ahead.

21 DR. NIEVA: Thank you. Jorge Nieva, USC.
22 So I was saying that in the clinical trial context,

1 there's going to be more delays than there will be
2 in actual practice because of the consent process
3 and everything else associated with trial
4 enrollment, so we expect that problem of delays to
5 go down. Now, I think we've heard some comments
6 from the FDA that you can't analyze the OS curves
7 because we don't have, a priori, rules and formal
8 testing at this level of events, but those curves
9 are pretty wide, and they don't look like they're
10 going to cross again, and I think the MRD data that
11 we have also supports they're not going to cross
12 again.

13 So I really think this is a case of
14 front-loaded risk, much like we see with many other
15 things in medicine, and I think as long as the
16 patients understand the magnitude of the
17 front-loaded risk, then I think these risks are
18 acceptable. Thank you.

19 DR. MADAN: Thank you, Dr. Nieva. I
20 appreciate you holding those comments for this
21 section.

22 I believe, Dr. Spratt, your hand was up

1 next.

2 DR. SPRATT: Thank you. Dan Spratt, UH
3 Seidman Cancer Center and Case Western Reserve
4 University. When I look at this, it's very
5 interesting, the early deaths, because with a PFS
6 benefit, there's also a worse or inferior PFS early
7 on as well. So you have to look at this in the
8 context globally and both, as the FDA appropriately
9 stated, will say a flawed assuming proportional
10 hazards analysis. But even in their analysis,
11 which, of course, would never be prespecified,
12 looking only at 0 to 3 months, their statistically
13 was not statistically significant, and looking over
14 the whole curves, it is, and as the sponsor showed,
15 the restricted mean survival time is a benefit at
16 various cutpoints.

17 Still very much, I don't think any trial
18 will ever be able to prespecify for non-
19 proportional hazards because you would not know
20 that necessarily a priori. So given it's widely
21 accepted in the statistical community that that is
22 probably a more appropriate way of looking at this,

1 I think that for patients treated, there is a
2 non-significant increase in early deaths and there
3 is a significant improvement in survival and PFS.
4 So I'm not overall concerned, and I think Dr. Nieva
5 hit the nail on the head, as I think these are
6 delays related, and we've talked about COVID, and
7 we talked about real world versus clinical trials.

8 DR. MADAN: Yes. Thank you, Dr. Spratt.

9 Dr. Lieu?

10 DR. LIEU: Yes. I'll keep my comments short
11 because I totally agree with Dr. Nieva and
12 Dr. Spratt. I'll just make mention, when you look
13 at the context of the progression-free survival
14 benefit and the sheer number of patients that you
15 see on the tail of that curve, along with the
16 duration of durable response, you put that in the
17 context of what could be harm, for sure, in the
18 first 3 to 6 months.

19 But I keep going back to the sheer number of
20 events that we see, and it's a really small number.
21 That's why, to Dr. Spratt's point, when you look at
22 the confidence intervals -- and I know safety is

1 descriptive, and we shouldn't rely on statistical
2 analyses here, but those confidence intervals are
3 unbelievably high when you look at the hazard
4 ratio, and that really just reflects the small
5 number of events in that period of time.

6 So to answer this question, when you look at
7 the context of the harm in a handful of events in
8 the early months compared to the tail of the curves
9 that we're seeing, I think it's a pretty clear
10 signal of benefit.

11 DR. MADAN: Thank you, Dr. Lieu.

12 Dr. Hunsberger?

13 DR. HUNSBERGER: Sally Hunsberger. I just
14 want to emphasize again, the censoring only in the
15 control arm is problematic to me, especially,
16 again, the fact that there are just so few in the
17 first 3 months and there are four censored events
18 that could totally make up -- those could be the
19 people that would have died going off treatment to
20 get something else. So again, the imbalance in the
21 censoring is also a problem to me, so I think I
22 also feel that the risk is probably acceptable.

1 DR. VERDUN: Hi. This is FDA. We would
2 like to respond as well. Is that ok?

3 DR. MADAN: Yes, briefly.

4 DR. VERDUN: Thank you. I'd like to bring
5 Dr. Scott from statistics. Thank you.

6 DR. SCOTT: Thank you. John Scott,
7 statistics. We appreciate the committee's
8 discussion of the RMST. We just wanted to point
9 out that the interpretation of RMST does very much
10 depend on, when you're looking at it, what the
11 cutpoints are, and that we're not yet fully
12 convinced of a long-term advantage on overall
13 survival, although, certainly, there is separation
14 visually in the curves after the crossing point.
15 Thanks.

16 DR. MADAN: Yes. Thanks for clarifying
17 that.

18 I think the committee accepts the
19 uncertainty of the data as it stands, but we're
20 doing our best, I think -- if I'm not speaking for
21 everybody, go ahead, but I think we're doing our
22 best to wrap our heads around it. But I think

1 Dr. Spratt can maybe go ahead and say something
2 more eloquent than what I just said.

3 Go ahead Dr. Spratt.

4 DR. SPRATT: Yes. Just for a discussion
5 point to the FDA, I mean, there's obviously the
6 clinical -- sorry, Dr. Spratt, Dan Spratt from UH
7 Seidman Cancer Center. I think that statistical
8 tests, while none of them are perfect, there is
9 conventional statistical significance using both a
10 log rank, a hazard ratio, and I assume they use
11 some type of Cox proportional hazard, as well as
12 the sponsor presents -- it wasn't in the packet
13 provided -- it was statistical significance. I
14 realize, for honesty, you have to pick a time
15 point, so picking something around 20 some odd
16 months was decent follow-up, or the 36 months, I
17 believe.

18 So I think by any standard statistical test,
19 realizing most of all of this is not prespecified,
20 they all are directionally consistent and reach
21 statistical significance. So it just seems that
22 we're digging really, really hard to focus on

1 non-statistically significant, very, very few
2 events early on, and I would just state that, are
3 we looking in contrast at survival curves that
4 separate early on in favor of, let's say, the
5 investigational agent, but come back together or
6 maybe cross later, and how do we handle that?

7 I don't want to be tangential here, but they
8 often come back together, and we often don't follow
9 patients long enough to see if they end up
10 flipping. So it just seems there may be some
11 inconsistencies here to be putting so much weight
12 on a couple events early on.

13 DR. SCOTT: Thanks. John Scott, FDA,
14 biostatistics. Yes. I certainly appreciate your
15 comments. I can't really speak to the second part
16 of that about curves coming together later, but I
17 would say there's a variety of statistical
18 significance tests that can be used, but we always
19 put a very strong premium on the prespecified
20 primary analyses of trials to support regulatory
21 decision making because looking post hoc and
22 choosing cutpoints after all the data have been

1 observed does tend to inflate the false positive
2 chance of being misled. Having said that, we
3 support the committee using all the evidence they
4 have in front of them to make up their minds.

5 Thank you.

6 DR. MADAN: Ravi Madan, NCI. I think from
7 my perspective -- this is shared across the
8 committee -- it's almost unsatisfying because we
9 have these 6 or 8 early deaths before treatment,
10 but we really can't pin down exactly what happened.
11 We can chalk it up to bridging therapy, or COVID,
12 and both of those things leave the door open for
13 things to get better in the future, which we hope,
14 but I think we're used to having more of a direct
15 tie.

16 Depending on how you see this, a little bit,
17 it's actually, I think, dictated by the long-term
18 outcomes, and what do you do when you have so much
19 unknown around such a small number of patients in
20 the beginning, and how does that balance with the
21 long-term potential benefits here? That's at least
22 my thoughts on this question.

1 Any other comments from the panel?

2 (No response.)

3 DR. MADAN: So I think in summarizing this,
4 the panel is struck by the fact that there are
5 numerically increased deaths early on. It's hard
6 with descriptive statistics to really understand
7 the implications and the ultimate determinations
8 here, but there is a sense of long-term benefit as
9 well. So I think the the sense of the panel's
10 discussion here has been that there are issues up
11 front, but they are small and perhaps balanced by
12 the long-term benefits.

13 If anyone wants to clarify that
14 characterization of this discussion further, please
15 let me know. But I also think we have to
16 acknowledge that, statistically, we can't be as
17 certain as maybe we'd like to be with the final
18 polished results of a phase 3 trial or something,
19 and I think that is well understood by the panel as
20 well, and that's part of the reason why it's a
21 discussion point here.

22 The FDA wants to make a final comment. Go

1 ahead.

2 DR. VERDUN: Hi. Yes. Sorry. Thank you.
3 We'd like to make one additional comment. Thank
4 you.

5 DR. FASHOYIN-AJE: Hi. It's Lola
6 Fashoyin-Aje again from FDA. I guess I just want
7 to emphasize and clarify our view of these data.
8 We may never know why there was this increase of
9 early deaths in the cilta-cel arm compared to the
10 control arm. This trial was not designed in a way
11 that allows us to know with certainty which
12 population is experiencing these increased deaths
13 in the treatment arm. This trial was a randomized
14 trial.

15 We do see these early deaths, and what we're
16 asking the committee, really, here is to consider
17 whether in light of the clinical benefit shown in
18 this trial, which we agree is clinically
19 meaningful, whether that benefit outweighs these
20 risks, which are risks associated with cilta-cel
21 treatment. Whether it's before the treatment is
22 administered or after the treatment is

1 administered, it's a risk. When a patient is
2 referred to receive this treatment, they're
3 foregoing other treatments that may not result in
4 deaths, so the totality of the risks associated
5 with the treatment should be considered as part of
6 the benefit-risk assessment.

7 Now, there was a lot of discussion around
8 the overall survival curves and the data provided
9 for survival, and I think another consideration for
10 the committee may be whether or not, at this time,
11 it is your assessment that those additional data
12 provide more support and reassurance around the
13 clinical benefit in a way that outweighs, again,
14 those risks that we don't completely understand why
15 these early deaths occurred.

16 So that's ultimately the reason we convened
17 this committee, is for you to say these PFS data,
18 this evidence of effectiveness, how do we consider
19 these early deaths in that context? But this trial
20 is not going to tell us for whom CAR T in this line
21 of treatment is more favorable than another group.
22 Thank you.

1 DR. MADAN: Right. I think their discussion
2 points -- Ravi Madan, NCI -- have really wrestled
3 with those 6 or 8 patients early on, and we don't
4 know, that are before the therapy. I think that's
5 actually been the crux of a lot of our discussions
6 here, and my sense, generally, is there is a sense
7 of benefit in terms of PFS here, but I welcome
8 anyone from the committee, or the panel I should
9 say, who would like to join in or have any other
10 comments in addition to that context. But I think
11 our discussion has been within that context, and if
12 anyone wants to chime in, go ahead, Dr. Frenkl.

13 DR. FRENKL: Okay. Thanks. I'll just say
14 when I look at the FDA slide, on slide 21, the rate
15 of death in the first 10 months after
16 randomization, I think is the context of what we're
17 talking about here. But I also appreciate the
18 sponsor's demonstration of the data, where it was
19 really in the first 2 months that accounted for the
20 difference in the death, which, of course, they
21 didn't receive the drug yet.

22 But if I look at that data that the FDA

1 showed on slide 21, it's 14 percent versus
2 12 percent in the rate of death, and that's in the
3 beginning before treatment -- first of all, 14 to
4 12 percent, it's hard to know if that's really a
5 meaningful difference, and then it's driven by
6 progressive disease prior to treatment, which makes
7 sense, and then after treatment, the rate of death
8 is actually lower in the cilta-cel arm. It's
9 9.1 percent versus 11.3 percent. So overall,
10 lower, and then the AE rate of 7.7 percent
11 versus -- sorry, I'm just trying to remember.

12 DR. MADAN: The slide's up. I think they
13 put it up.

14 DR. FRENKL: Oh, the the slide is up? Okay.
15 Thank you. Yes. So here, after treatment, the
16 higher rate of death is due to AEs, 7.7 percent
17 versus 4.2 percent, but then that's traded with
18 death from PD, and results in the overall. So, to
19 me, it's definitely a positive risk-benefit ratio
20 here when we're looking at it.

21 DR. MADAN: Okay. Yes. I think you've
22 highlighted the slide that's pinpointed a lot of

1 what we've been discussing here, Dr. Frenkl, so I
2 thank you for doing that.

3 Does anybody else want -- Dr. Spratt, go
4 ahead.

5 DR. SPRATT: Yes. Dan Spratt, Case Western.
6 Again, just trying to make it a discussion here,
7 and again, to respond, I appreciate what the FDA
8 said, that they want for regulatory approval to
9 focus on prespecified endpoints. And just going
10 back to the question here, the discussion point,
11 the PFS benefit prespecified was positive.

12 I don't know if they can pull up on the FDA
13 presentation, slide 30, which is the OS data with
14 the longer term follow-up data cutoff from
15 December 13, 2023, if that can be shown, but in the
16 context -- perfect; on the right, we're talking
17 about the early deaths. I think, again, they
18 showed -- and I realize the confidence intervals
19 are incredibly wide because there are so few events
20 early on. There is no statistical difference, and
21 I think many of us early on, if you saw curves that
22 just sort of floated around there, we would say

1 that's probably just negative, no difference, but
2 there's plenty of events happening after that.

3 So I think in this prespecified secondary
4 endpoint, overall survival was also statistically
5 significant, so I'm still a little bit confused
6 here. The prespecified a priori endpoints were
7 positive.

8 DR. MADAN: Right, and I think that that
9 factors into a little bit of our discussion here
10 because we have some positive long term with
11 survival and PFS signals, but the short-term focus
12 of this question is really the early risk of death,
13 so we're struggling with that a little bit. But I
14 think that's actually been the heart of the matter
15 this morning, and not something lost on the panel.

16 I do think that Dr. Spratt, in a lot of
17 ways, summed it up very nicely, that we're seeing
18 those curves, we're seeing the PFS benefit, and the
19 deaths up front are concerning and definitely
20 factoring into our decision, including the deaths
21 before treatment, and that's factored into our
22 discussion here.

1 My sense, again, from this conversation that
2 we're having about specifically question 2, just as
3 a summary, is that there is an acknowledgement of
4 early risk, some of what may or may not be clearly
5 mitigated in the future. There is optimism that
6 that's possible, but there are no guarantees, but
7 the sense is that it does lead to long-term
8 benefits here, and I think that's the sense of the
9 the panel, although I think we'll have a vote
10 coming up with our third question. That's how I
11 would summarize our discussion point here. I
12 appreciate everyone for contributing, and this was
13 good.

14 So with that, unless there are any last
15 comments, we will now proceed to question 3, which
16 is a voting question. I don't see any hands, so
17 Dr. Joyce Frimpong will now provide us instructions
18 for the voting question. And again, just pay
19 attention to what the question's asking and make
20 sure that we go ahead.

21 Dr. Frimpong, you're up.

22 DR. FRIMPONG: Thank you, Dr. Madan.

1 This is Joyce Frimpong, DFO. Question 3 is
2 a voting question. Voting members will use the
3 Zoom platform to submit their votes for this
4 meeting. If you are not a voting member, you will
5 be moved to a breakout room while we conduct the
6 vote. After the chairperson reads the voting
7 question into the record and all questions and
8 discussion regarding the wording of the vote
9 question are complete, we will announce that voting
10 will begin.

11 A voting window will appear where you can
12 submit your vote. There'll be no discussion during
13 the voting session. You should select the button
14 in the window that corresponds to your vote.
15 Please note that once you click the submit button,
16 you will not be able to change your vote. Once all
17 voting members have selected their vote, I will
18 announce that the vote is closed. Please note that
19 there will be a momentary pause as we tally the
20 vote results and return non-voting members into the
21 meeting room.

22 Next, the vote results will be displayed on

1 the screen. I'll read the vote results from the
2 screen into the record. Thereafter, the
3 chairperson will go down the list and each voting
4 member will state their name and their vote into
5 the record. Voting members should address any
6 subparts of the vote in question, including the
7 rationale for their vote.

8 Are there any questions about the voting
9 process before we begin?

10 (No response.)

11 DR. FRIMPONG: Since there are no questions,
12 I will hand it back to Dr. Madan so we can begin.

13 DR. MADAN: Okay. This is the voting
14 question that we are being asked to vote on. Is
15 the risk-benefit assessment of cilta-cel for the
16 proposed indication favorable? And I'll ask the
17 committee or panel if they have any requests for
18 clarification on voting question number 3?

19 (No response.)

20 DR. MADAN: Not seeing any hands requesting
21 clarification, I think we will move forward with
22 voting on question 3.

1 DR. FRIMPONG: We will now move non-voting
2 participants to the breakout room.

3 (Voting.)

4 DR. FRIMPONG: Voting has closed and is now
5 complete. The voting results will be displayed.

6 (Pause.)

7 DR. MADAN: Thank you. I think I'm not
8 seeing the Excel voting list, but we will now go
9 down the list.

10 DR. FRIMPONG: Dr. Madan --

11 DR. MADAN: Go ahead.

12 DR. FRIMPONG: -- I'll be able to read.

13 DR. MADAN: Go ahead.

14 DR. FRIMPONG: There are 11 yeses, 0 noes,
15 and 0 abstentions. I'll hand it over to you.

16 DR. MADAN: Thank you. Okay. Thank you,
17 Dr. Frimpong.

18 We will go down the list and have everyone
19 who voted state their name into the record. You
20 may also include the rationale for your vote. It
21 looks like I am up first, so I will go ahead and do
22 that.

1 I voted yes. The data from the CARTITUDE-4
2 is still somewhat immature, but it appears to be
3 favorable in its totality at this time. While the
4 risks of early death, often prior to therapy, are
5 not ignored in this discussion or this vote this
6 morning, it does seem to be outweighed by the
7 long-term potential benefits here. Ideally,
8 emphasis in the further development of this therapy
9 could be placed in better understanding of how to
10 optimize bridging therapy and guarding against
11 infection for patients with multiple myeloma to
12 further optimize this therapy.

13 Our second vote comes from John Deflice.

14 DR. DEFLICE: Yes. My perspective is from a
15 myeloma perspective. I've had myeloma for
16 13 years, and I know most of the people that gave
17 testimonials for Carvykti is based on the
18 CARTITUDE-4 study. I've been a facilitator of a
19 support group in New Mexico for greater than
20 10 years, and we've had attendees at the last
21 meeting from California and New York. We've also
22 started a support group to the IMF, a Spanish

1 support group, which is mostly international, and I
2 also volunteer for the LLS.

3 As we witnessed, we were informed that the
4 deaths were not related to Carvykti but were
5 related to other issues, and it was during the
6 pandemic. And we were also informed that there may
7 be variations and options for bridging therapy, so
8 I wholeheartedly voted yes.

9 DR. MADAN: Thank you, Mr. Deflice.

10 Dr. Advani?

11 DR. ADVANI: So I voted yes for very similar
12 reasons. I think the benefit is pretty robust, and
13 there's the small number of patients in the
14 beginning, and largely the deaths are related to
15 not getting the treatment, or inadequate bridging,
16 or delay, or COVID; not completely understood, but
17 I think, overall, it was a very positive trial with
18 significant benefit to most patients.

19 DR. MADAN: Thank you.

20 Dr. Lieu?

21 DR. LIEU: Hi, everybody. This is Chris
22 Lieu from University of Colorado. I voted yes. To

1 me, I thought that the data that was striking was
2 the tail of the PFS curve and the duration of
3 response. If patients have a chance to get a
4 durable response while being off of therapy, the
5 question is whether or not the patients are willing
6 to undertake the risk that we see in the data so
7 far of early progression or death.

8 The old adage is, is the run worth the
9 slide? And the run here, it's not trivial. We're
10 talking about potential increased risk of death in
11 the early months. There's no question that these
12 patients are going to experience cytokine relief
13 syndrome, the possibility of ICANS, and other
14 long-term toxicities. If there's only a minimal
15 improvement in PFS, the answer here is always no;
16 it's too short of a, quote, "slide," however,
17 there's a chance for a long durable response.

18 While not receiving toxic therapy during
19 that response time, the answer may be yes, and I
20 honestly believe the answer will likely be yes for
21 patients who may want just a chance at a long,
22 durable time off treatment for multiple myeloma, so

1 therefore, I believe the benefit-risk profile is
2 favorable. Thank you.

3 DR. MADAN: Thank you, Dr. Lieu.

4 Dr. Gradishar?

5 DR. GRADISHAR: Yes, much the same. I felt
6 that the long-term PFS was compelling and the
7 survival is going in that direction. Furthermore,
8 the upfront risk, I remain unconvinced that that's
9 directly attributable to the therapy itself. I
10 think there are other factors that are likely
11 contributing rather than the therapy in question.
12 So I think the totality of the data is what
13 motivated me to vote yes.

14 DR. MADAN: Thank you.

15 Dr. Vasani?

16 DR. VASANI: Hi. Neil Vasani, Columbia. I
17 voted yes. So for me, this came down to
18 acknowledging the very real but small risks of
19 early death relative to the large benefits, and I
20 believe that the benefits here do outweigh the
21 risks. I think that the analogy to bone marrow
22 transplant is relevant, and that in further years,

1 as we obtain more experience with CAR T cells in
2 myeloma, we'll have a better understanding of all
3 of these risks and benefits.

4 That being said, I do have concerns about
5 the balance in post-progression therapies in this
6 trial, which would directly impinge on OS. I'd
7 like to thank the FDA and the applicant. I think
8 this was a productive discussion today on
9 endpoints. It's clear that there are challenges in
10 getting patients to CAR T therapy in myeloma, and I
11 hope that all stakeholders can further define the
12 subgroups of patients who can and cannot make it to
13 therapy and expedite the timeline to receiving
14 CAR T cells. Thank you.

15 DR. MADAN: Thank you, Dr. Vasan.

16 Dr. Nieva?

17 DR. NIEVA: Jorge Nieva, USC. I voted yes.
18 People want to be cured, and this treatment induces
19 long term eradication of minimal residual disease,
20 but I think it comes at an upfront cost, and I
21 don't think it's entirely the delays. I think it's
22 also the preconditioning regimen. But this is

1 something that can be individually decided between
2 patients and physicians, and I think each person
3 can decide for themselves if the run is worth the
4 slide, as Dr. Lieu said. Thank you.

5 DR. MADAN: Thank you, Dr. Nieva.

6 Dr. Spratt?

7 DR. SPRATT: Yes. Dan Spratt, UH Seidman
8 Cancer Center and Case Western Reserve University.
9 I voted yes. I think the FDA was very appropriate
10 to focus on these early deaths; however, seeing the
11 totality of the data, I think both the prespecified
12 primary and at least all the presented secondary
13 endpoints -- so PFS, CRs, minimal residual disease
14 just mentioned, and even including overall
15 survival -- clearly favor this agent.

16 I think the benefit outweighs the risk, and
17 I think there's a lot of learning lessons to
18 continue to optimize this, as well as I think the
19 discussion today is worth further discussion also
20 on design of endpoints and prespecification
21 analyses, and how to actually embed these in a
22 realistic way.

1 DR. MADAN: Thank you, Dr. Spratt.

2 Dr. Lattimore?

3 MS. LATTIMORE: Thank you. Susan Lattimore.

4 I also voted yes. I just want to lift the comments
5 of others on this committee in that the opportunity
6 for off-treatment time is incredibly compelling for
7 patients and families. Certainly improving access
8 to this treatment will improve overall outcomes for
9 all individuals, so I appreciate the conversation
10 and a second look at this data.

11 DR. MADAN: Thank you, Dr. Lattimore.

12 Dr. Hunsberger?

13 DR. HUNSBERGER: Sally Hunsberger. I voted
14 yes. I agree that the PFS data is very strong. I
15 think it was appropriate for the FDA to want to
16 explore the early deaths and ask this question, so
17 I do applaud that, and so I affirm Dr. Spratt's
18 comments. But I do think the long-term survival
19 curves that are looking to separate are really
20 important and outweigh the early deaths, but I
21 think we do need to explore what's going on early.
22 Thank you.

1 DR. MADAN: Thank you. Dr. Hunsberger.

2 Dr. Kwok?

3 DR. KWOK: Mary Kwok, University of
4 Washington, Fred Hutch Cancer Center. I also voted
5 yes. I think the separation of the curves showing
6 improvement of PFS with this regimen early on is
7 impressive. It's an important therapy, and I just
8 echo other comments from this panel.

9 I also agree that treating oncologists will
10 have to have a serious conversation with the
11 patient when it comes time to choose this option to
12 explore the increased risk of death, and then I
13 also look forward to future data to help us
14 understand what's going on and what we can do to
15 improve.

16 DR. MADAN: Thank you, Dr. Kwok.

17 So I think, just to summarize, we see that
18 the votes were 11 for yes and zero for no. I think
19 the committee in this discussion today clearly
20 recognized that the early deaths are a concern and
21 something that really needs to be worked on to be
22 mitigated in the future, but I also think that the

1 committee recognized that despite our best efforts,
2 we probably don't have one clear cause for that.
3 And on top of that, the PFS data is encouraging,
4 and then the added dimension of the fact that those
5 aren't just curves, but are patients free of
6 therapy, I think really resonated with the
7 committee today.

8 I think there was some optimism that these
9 survival curves are giving us a glimpse into truly
10 longer duration of flattening of the curves, or
11 tails on the curves as we like to say, which maybe
12 indicates much more longer disease-free survival.
13 But I think that everybody agrees that we need to
14 pay attention to these upfront deaths and also
15 optimize this, and continue to follow this data.

16 Taking a step back, though, I agree with the
17 committee here. This was an important question to
18 ask, and I appreciate the FDA for their balanced
19 discussion and helping us understand the data in an
20 added dimension as well. I appreciate the openness
21 of Janssen Biotech in sharing their data, and the
22 presentations I thought were very good on both the

1 FDA and the sponsor side.

2 We had 10 open public hearing speakers, and
3 they shared their stories, and I do think that,
4 again, it resonated with the committee. So I just
5 want to say thank you to everybody for joining this
6 morning session. We still have an afternoon
7 session to come, which we'll talk about in a
8 moment. But before we do adjourn this morning
9 session, I just want to make sure that there are no
10 last comments from the FDA.

11 DR. VERDUN: Thank you. I would just like
12 to, on behalf of the FDA, really thank the
13 committee for the robust conversation and
14 discussion this morning. It was extremely helpful
15 to us, and we appreciate your time and the thought
16 that you put into that discussion. Thank you very
17 much.

18 **Adjournment**

19 DR. MADAN: Thank you.

20 So we are now going to adjourn this
21 morning's session. We went a little long, so I
22 would like to reconvene at 1:30 instead of 1:25.

1 The FDA has given us an opportunity to do that, so
2 we can reconvene, then, at 1:30. Panel members,
3 please remember that there's no discussion or
4 chatting of the meeting topics with other panel
5 members during this break or lunch. Additionally,
6 panel members should plan to join back at 1:20 p.m.
7 Eastern Time to ensure that we are connected before
8 we reconvene to start the afternoon session at
9 1:30 p.m. Eastern Time.

10 Thank you, everybody, for a productive
11 morning session.

12 (Whereupon, at 1:00 p.m., the morning
13 session was adjourned.)
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