azurity pharmaceuticals

Committed to making a difference in patients' lives.

January 06, 2026

FDA/Center for Drug Evaluation and Research (CDER)
Central Document Room (CDR)
5901-B Ammendale Road
Beltsville, MD 20705-1266

Re: NDA # 214679; eCTD Sequence # 0069
EPRONTIA® (topiramate) Oral Solution, 25 mg/mL
RESPONSE TO PREA NONCOMPLIANCE LETTER
DEFERRAL EXTENSION REQUESTED
Submitted via Electronic Submission Gateway

Dear Sir/Madam:

Reference is made to Azurity Pharmaceuticals, Inc. (referred as "Azurity"), NDA # 214679 for EPRONTIA® (topiramate) Oral Solution, 25 mg/mL approved by the Agency on November 5, 2021. Reference is also made to the IND# 139533 wherein the PMR study protocols have been submitted.

We hereby submit the Response to PREA Noncompliance Letter received dated November 21, 2025 (i.e. Notification of Non-Compliance with PREA), and a Deferral Extension with the reason for the delay.

Azurity has two approved products, EPRONTIA (topiramate oral solution- NDA#214679) and ZONISADE (zonisamide oral suspension - NDA#214273) with post-marketing requirements (PMR) which target the same population of pediatric patients with partial-onset (focal) seizures. Azurity has previously corresponded with the Agency regarding challenges associated with finding clinical sites and investigators on the ZONISAMIDE PMR which is currently in trial initiation. However, this has led to delays related to PMR 4302-1. These same issues, subsequently, also have impacted to the EPRONTIA PMR, which is currently out of compliance.

Azurity approached the PMRs for both ZONISADE and EPRONTIA with initial understanding that the trials (AZ04.001 to address PMR 4302-1 (ZONISADE) and AZ05.002 to address PMR 4169-2 and PMR 4169-3 (EPRONTIA)) could possibly be conducted in parallel. However, this sets up the situation of competing trials for the same participants at the same sites due to the finite sites able to conduct pediatric pharmacokinetic (PK) trials in participants with partial-onset seizures.

The level of difficulty to the challenge faced in the recruitment of study sites willing to participate in the research for AZ04.001 (PMR 4302-1; ZONISADE) was not anticipated, and this led Azurity to consider the impact the EPRONTIA program. While the populations in the two trials differ slightly in that AZ04.001 (PMR 4202-1; ZONISADE) is recruiting participants aged 1 month to 17 years of age and AZ05.002 (PMR 4169-2 and PMR 4169-3; EPRONTIA) is recruiting only participants aged 1 month to 2 years of age. Thus, in terms of ability to recruit and conduct a trial in pediatric patients with partial onset seizures, the youngest age range becomes the key component that has limited Azurity's ability to conduct the EPRONTIA PMR 4169-3 trial due to overlap.

As clinical research sites with apparent access to the pediatric population with partial-onset seizures and capabilities of performing pediatric PK trials to conduct AZ04.001 were approached, Azurity received feedback that the sites would not be able to recruit the population for this trial. Again, the age range for AZ04.001 was a larger range than that of AZ05.002. Additionally, other sites indicated that they had competing trials in partial-onset seizures already in operation at the site or opening soon at the site, which did not include neither of Azurity's ZONISADE trials, which will compete with the EPRONTIA trial.

Even with the expanded age range for the AZ04.001 trial (1 month to 17 years of age) (as compared with the AZ05.002 trial – 1 month to 2 years of age), the investigators, staff, and contract research organizations (CRSs) indicated they would not likely be able to recruit due to the PK requirement. Due to this feedback, and as indicated above, Azurity anticipated AZ05.002 (the 1 month to 2 years of age trial) would be even more challenged due to weight-based blood draw restrictions in children of that age/weight since safety lab blood draws will also be required.

As previously communicated to the Agency in our correspondence on September 23, 2024, Annual Report, related to AZ04.001 (PMR 4202-1) for Zonisade, Azurity has been actively engaging potential clinical investigators and sites that could conduct the trial. From the evaluation of an initial 50 sites identified by the CRO, 48 potential investigative sites with qualifications to perform this study were further screened for feasibility. To date, only two have agreed to participate. One additional site was selected for participation in the clinical trial (AZ04.001). However, the site dropped out during the study startup phase due to staff resource constraints at the site, two investigators resigned, leading to potential risk of patient safety and data integrity. An additional site declined participation in the trial after the site evaluation visit. The difficulty of identifying and contracting sites to enroll study participants was unforeseen during the initial finalization of Azurity's PMR. The circumstances of site withdrawals after selection were not anticipated and have shown to delay the initiation of the studies.

Due to the continued challenges in finding clinical research sites and Investigators for AZ04.001, Azurity would like to request a 2-year deferral extension to allow for Azurity's competing trial to complete enrollment and for data to be collected for that trial. Azurity would review the data from

AZ04.001 to identify sites that were successful at recruiting participants under the age of 2 and approach those sites to assess interest for AZ05.002.

This submission is organized in accordance with the Agency's Guidance for Industry, *"Providing Regulatory Submissions in Electronic Format - Certain Human Pharmaceutical Product Applications and Related Submissions Using eCTD Specifications (September 2024)".*

Should you have any questions concerning this submission, please contact Madhumita Nayak, Senior Manager, Regulatory Affairs by e-mail at primary e-mail: rasa@azurity.com. Alternatively, you may reach out to Azurity's Regulatory Affairs Department (Felicia Bullock, Senior Director, Head of Regulatory Affairs) by phone at +1-(984)-222-6823. Please note that all email correspondence from Azurity regarding this application will be sent from madhumita.nayak@azurity.com.

Sincerely,

Madhumita Nayak

Digitally signed by Madhumita Nayak
Date: 2026.01.06 07:39:19 +05'30'

Madhumita Nayak
Senior Manager, Regulatory Affairs