U.S. FOOD & DRUG ADMINISTRATION

VIA UNITED PARCEL SERVICE AND E-MAIL

CSPC-NBP Pharmaceutical Co., Ltd.
Attention: Xi-De Wang, PhD, Vice President, Regulatory Science and Compliance
Conjupro Biotherapeutics, Inc., CSPC Pharmaceutical Group
302 Carnegie Center
Suite 100
Princeton, New Jersey 08540

Re: Submission of Clinical Trial Results Information Pursuant to 42 U.S.C. 282(j)
FDA Reference Number: CDER-2026-136
NCT02905565

Dear Dr. Wang:

Based on an initial review of Food and Drug Administration (FDA) records, information from the ClinicalTrials.gov data bank operated by the National Library of Medicine, a part of the National Institutes of Health, and any available public information, it appears that CSPC-NBP Pharmaceutical Co., Ltd. is the "responsible party"[1] for the above-identified clinical trial, which appears to be an "applicable clinical trial"[2] subject to the requirements of section 801 of the Food and Drug Administration Amendments Act of 2007, including its implementing regulations in 42 CFR part 11. A responsible party for an applicable clinical trial is required to submit to the ClinicalTrials.gov data bank certain results information for the clinical trial; such results information generally must be submitted no later than one year after the primary completion date[3] of the applicable clinical trial, unless the responsible party has submitted a timely certification of delay, a

[1] *See* sections 402(j)(1)(A)(ix) of the Public Health Service Act (PHS Act) (42 U.S.C. 282(j)(1)(A)(ix)) and 42 CFR 11.10 for the definition of "responsible party."
[2] *See* sections 402(j)(1)(A)(i)-(iii) of the PHS Act (42 U.S.C. 282(j)(1)(A)(i)-(iii)) and 42 CFR 11.10 for the definition of "applicable clinical trial."
[3] *See* 42 CFR 11.10 for the definition of "primary completion date." *See also* section 402(j)(1)(A)(v) of the PHS Act (42 U.S.C. 282(j)(1)(A)(v)), which defines "completion date." As reflected in 42 CFR 11.10, the terms "primary completion date" and "completion date" are synonymous for the purposes of 42 CFR part 11.

U.S. Food & Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993
www.fda.gov

request for an extension for good cause, or a request for a waiver of the requirements for submission of results information.[4]

FDA has identified potential noncompliance related to the above-identified clinical trial, titled "A Phase 2, Multicenter, Randomized, Double-Blind, Placebo-Controlled, Add-On to Standard Of-Care Study of n Butylphthalide (NBP) Softgel Capsules for Treatment of Mild to Moderate Acute Ischemic Stroke (AIS) in Adult Subjects." It appears that results information for the referenced applicable clinical trial has not been submitted to the ClinicalTrials.gov data bank.[5] Moreover, it appears that your company failed to update the responsible party contact information for this clinical trial as required under 42 CFR 11.64(a)(1)(ii)(L).[6] Your company should review its records of this clinical trial and determine whether your company submitted all required information. If your company determines that information is required and due for this clinical trial, please submit the information promptly.

Failure to submit clinical trial information[7] required under section 402(j) of the PHS Act (42 U.S.C. 282(j)), including information required under the regulations found in 42 CFR part 11, is a prohibited act under section 301(jj)(2) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) (21 U.S.C. 331(jj)(2)). Beginning 30 calendar days after you receive this letter, FDA intends to further review and assess the above-identified clinical trial. If FDA determines that your company has failed to submit any clinical trial information required under section 402(j) of the PHS Act (42 U.S.C. 282(j)), including its implementing regulations in 42 CFR part 11, your company may receive from FDA a Notice of Noncompliance,[8] and FDA may thereafter initiate an enforcement action against your company.

As requested, please review your company's clinical trial records and submit any required results information to the ClinicalTrials.gov data bank. We also request that you review all applicable clinical trials for which your company is the responsible party to ensure compliance with all ClinicalTrials.gov registration and results information submission requirements. You can access the ClinicalTrials.gov website at https://register.clinicaltrials.gov.

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[4] *See* sections 402(j)(3)(E) and (H) of the PHS Act (42 U.S.C. 282(j)(3)(E) and (H)) and 42 CFR part 11, subpart C for results information submission requirements.

[5] We acknowledge that, as recently as March 13, 2023, your company entered results information for NCT02905565 into the National Library of Medicine Protocol Registration and Results System (PRS); however, your company did not complete the process for submitting results information, and the preliminary steps taken by your company do not constitute submission of results information under 42 CFR 11.44(a).

[6] For applicable clinical trials initiated on or after January 18, 2017, such as the referenced clinical trial, 42 CFR 11.64(a)(1)(ii)(L) requires that responsible party contact information be "updated not later than 30 calendar days after a change in the responsible party or the contact information for the responsible party." If your company is no longer the responsible party for this clinical trial, your company should notify FDA and must update this information in the ClinicalTrials.gov data bank.

[7] *See* sections 402(j)(1)(A)(iv) of the PHS Act (42 U.S.C. 282(j)(1)(A)(iv)) and 42 CFR 11.10 for the definition of "clinical trial information."

[8] *See* section 402(j)(5)(C)(ii) of the PHS Act (42 U.S.C. 282(j)(5)(C)(ii)).

We request that you submit a written response to FDA within 30 calendar days after you receive this letter, stating the actions you have taken in response to this letter. If you believe that your company has complied with applicable requirements, please provide us with your reasoning and include any supporting information for our consideration.

Your written response, and any questions or concerns about this letter, should be sent via email to the FDA at CDER-OSI-Advisory@fda.hhs.gov. Please include the FDA reference number with any e-mail communications.

Sincerely yours,

{See appended electronic signature page}

Laurie Muldowney, M.D.
Deputy Director
Office of Scientific Investigations
Office of Compliance
Center for Drug Evaluation and Research
U.S. Food and Drug Administration

cc: (b) (6)
CSPC-NBP Pharmaceutical Co., Ltd.

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

LAURIE B MULDOWNEY
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