

**Apadaz™
(immediate-release benzhydrocodone
with acetaminophen) for the Treatment
of Acute Pain**

May 5, 2016

KemPharm, Inc.

Joint Meeting of the Anesthetic and Analgesic Drug
Products Advisory Committee and the Drug Safety and
Risk Management Advisory Committee

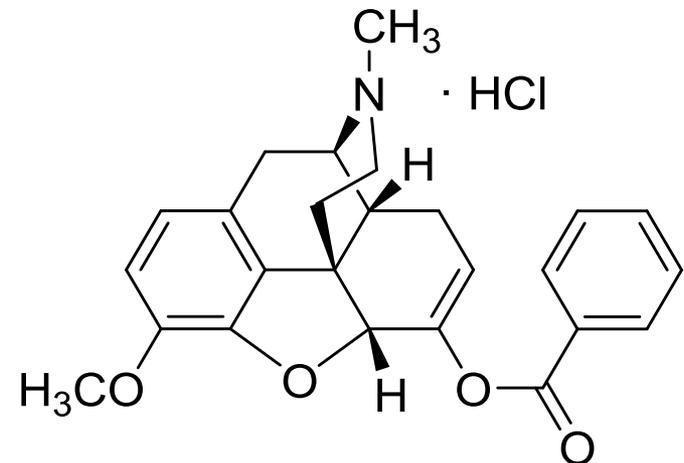
Introduction

Travis Mickle, Ph.D.

Co-Founder and Chief Executive Officer
KemPharm, Inc.

Apadaz is a Fixed-Dose IR Hydrocodone Combination Product

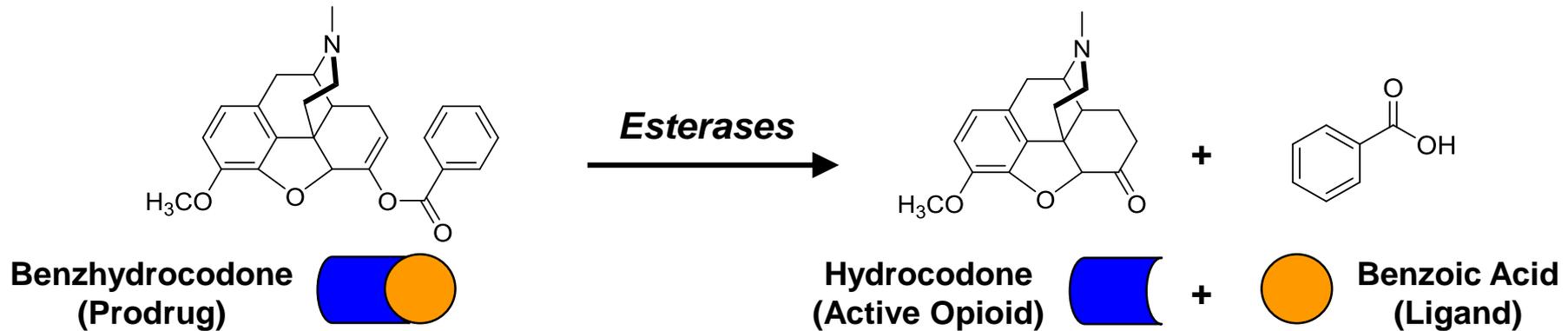
- Apadaz is composed of:
 - **Benzhydrocodone HCl [KP201]** (6.67 mg)
 - Prodrug: hydrocodone + benzoic acid
 - Equivalent to 7.5 mg hydrocodone bitartrate
 - **Acetaminophen [APAP]** (325 mg)
- Taken every 4-6 hours



Abuse-Deterrent Features of Apadaz Imparted Using a Novel Approach

- Historical approaches to deter abuse:
 - Agonist/antagonist
 - Aversive agents
 - Physical/chemical barriers
- Apadaz is a prodrug that imparts abuse-deterrence at molecular level
 - No impact of crushing or grinding on release profile
 - Abuse-deterrence does not affect analgesia

Apadaz Imparts Abuse-Deterrent Properties as Prodrug of Hydrocodone



- Intact prodrug is inert
- Ligand is naturally-occurring in berries

- Active hydrocodone cleaved from ligand through natural processes in GI tract

Summary of Clinical Pharmacology

- Bioequivalent to reference drugs to meet requirement of 505(b)(2) pathway
- Bioequivalent to Norco
- No clinically significant food effect
- No systemic exposure to prodrug when taken orally

Similar Incidence of AEs for Both Products

	Apadaz (N=161)	Norco (N=141)
Nausea	21%	26%
Somnolence	21%	21%
Pruritus	14%	15%
Vomiting	14%	11%
Constipation	12%	14%
Dizziness	8%	6%
Headache	3%	3%
Hypotension	3%	0%
Flatulence	1%	1%

Apadaz Offers Protections Against Non-Oral Routes of Abuse

Route of Abuse	Summary of Findings with Apadaz
Oral	Drug Liking similar to Norco, as expected
Intranasal	Lower hydrocodone exposure and lower Drug Liking compared to Norco at early time points; increased nasal adverse effects
Intravenous	Cannot be efficiently extracted for IV injection; prodrug converts slowly to hydrocodone in blood
Smoking / Vaporizing	No release of hydrocodone

Agenda

Clinical Perspective

Jeffrey Gudin, M.D.

Director

Pain Management and Palliative Care
Englewood Hospital and Medical Center

Development Overview and Tampering Studies

Travis Mickle, Ph.D.

Co-Founder and Chief Executive Officer
KemPharm, Inc.

Clinical Abuse-Deterrence Studies

Lynn Webster, M.D.

Vice President, Scientific Affairs
PRA Health Sciences

Post-Market Surveillance Future Studies

Travis Mickle, Ph.D.

Benefit-Risk Profile

Jeffrey Gudin, M.D.

Additional Experts

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Vice President, Health Analytics
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Clinical Perspective

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Director, Pain Management and Palliative Care
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Clinical Instructor, Anesthesiology
Icahn School of Medicine, Mt. Sinai



The NEW ENGLAND JOURNAL of MEDICINE

SPECIAL REPORT

A Proactive Response to Prescription Opioid Abuse

Robert M. Califf, M.D., Janet Woodcock, M.D., and Stephen Ostroff, M.D.

We at the Food and Drug Administration (FDA) continue to be deeply concerned about the growing epidemic of opioid abuse, addiction, and overdose — an epidemic directly related to the increasingly widespread misuse of powerful opioid pain medications.

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A Proactive Response to Prescription Opioid Abuse

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We at the Food and Drug Administration (FDA) continue to be deeply concerned about the growing epidemic of opioid abuse, addiction, and overdose — an epidemic directly related to the increasingly widespread misuse of powerful opioid pain medications. As the federal agency charged with ensuring that the drugs used by the U.S. public are both effective and safe, we are committed to working in partnership with other government agencies, health care providers, the medical products industry and, most important, patients and their families to deal proactively with this unfolding public health crisis, which has already profoundly affected individuals, families, and communities throughout our country. We will do so while also safeguarding appropriate access to vitally important pain medications for the patients who need them (Table 1).

BACKGROUND

Over the course of a given year, approximately 100 million people in the United States suffer from pain. Some 9 million to 12 million of them have chronic or persistent pain, while the remainder have short-term pain from injuries, illnesses, or medical procedures. All of them should benefit from skillful and appropriate pain management, which may include the judicious use of opioid medicines in conjunction with other methods of treatment or in circumstances in which nonaddictive therapies are insufficient to control pain.

As physicians, we have treated both the intense suffering caused by acute pain and chronic pain with all its exhausting and debilitating consequences. But we have also witnessed the devastating results of opioid misuse and abuse, such as the addiction of patients who have been prescribed opioids for pain treatment and, increasingly, diversion to people for whom the prescription was not written. Many Americans are now addicted to prescription opioids, and the number

of deaths due to prescription opioid overdose is unacceptable. This past month, our sister agency, the Centers for Disease Control and Prevention (CDC), estimated that in 2014 there were almost 19,000 overdose deaths in the United States associated with prescription opioids (Rudd R, CDC, personal communication).

Because protecting the public by ensuring the safety, efficacy, and quality of drugs is an essential part of the FDA's mission, it is appropriate to examine the agency's actions in coping with the public health crisis of opioid misuse. As FDA leaders and as physicians, we believe that these efforts must be founded on two complementary principles: that the United States must deal aggressively with opioid misuse and addiction, and at the same time, that it must protect the well-being of people experiencing the devastating effects of acute or chronic pain. It is a difficult balancing act, but we believe that the continuing escalation of the negative consequences of opioid use compels us to comprehensively review our portfolio of activities, reassess our strategy, and take aggressive actions when there is good reason to believe that doing so will make a positive difference.

We are launching this renewed effort in the context of a broad national campaign that includes a major initiative led by the Department of Health and Human Services (HHS) designed to attack the problem from every angle. The number of annual opioid prescriptions written in the United States is now roughly equal to the number of adults in the population¹; given these numbers, simply reinforcing opioid-related activities that are within the FDA's traditional regulatory scope will not suffice to stem the tide. Instead, we must work more closely with key federal agencies (including many within HHS), the clinical and prescriber communities, and other stakeholders to ensure that all available effective tools are brought to bear on this epidemic and that the evidence base for proper

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All Opioid Products with Abuse-Deterrent Labeling are Extended-Release/Long-Acting

- Six approved ER/LA opioids with abuse-deterrent labeling:
 - OxyContin (oxycodone)
 - Targiniq (oxycodone and naloxone)
 - Embeda (morphine sulfate and naloxone)
 - Hysingla ER (hydrocodone)
 - Morphabond (morphine sulfate)
 - Xtampza ER (oxycodone)
- Abuse-deterrent properties can lower, but not eliminate ability to abuse opioid

Currently No Approved IR Opioid with Abuse-Deterrent Labeling

- No IR opioids labeled for abuse-deterrence
- Hydrocodone IR combination products:
 - 90 million dispensed prescriptions in 2015
 - Most commonly prescribed analgesic
 - Often the first opioid abused
- Unmet need to prevent escalation and progression of opioid abuse

Goal: Prevention of Progression from Oral Route to More Dangerous Routes of Administration

Oral



Snorting



Smoking



Injection



Progression of Abuse

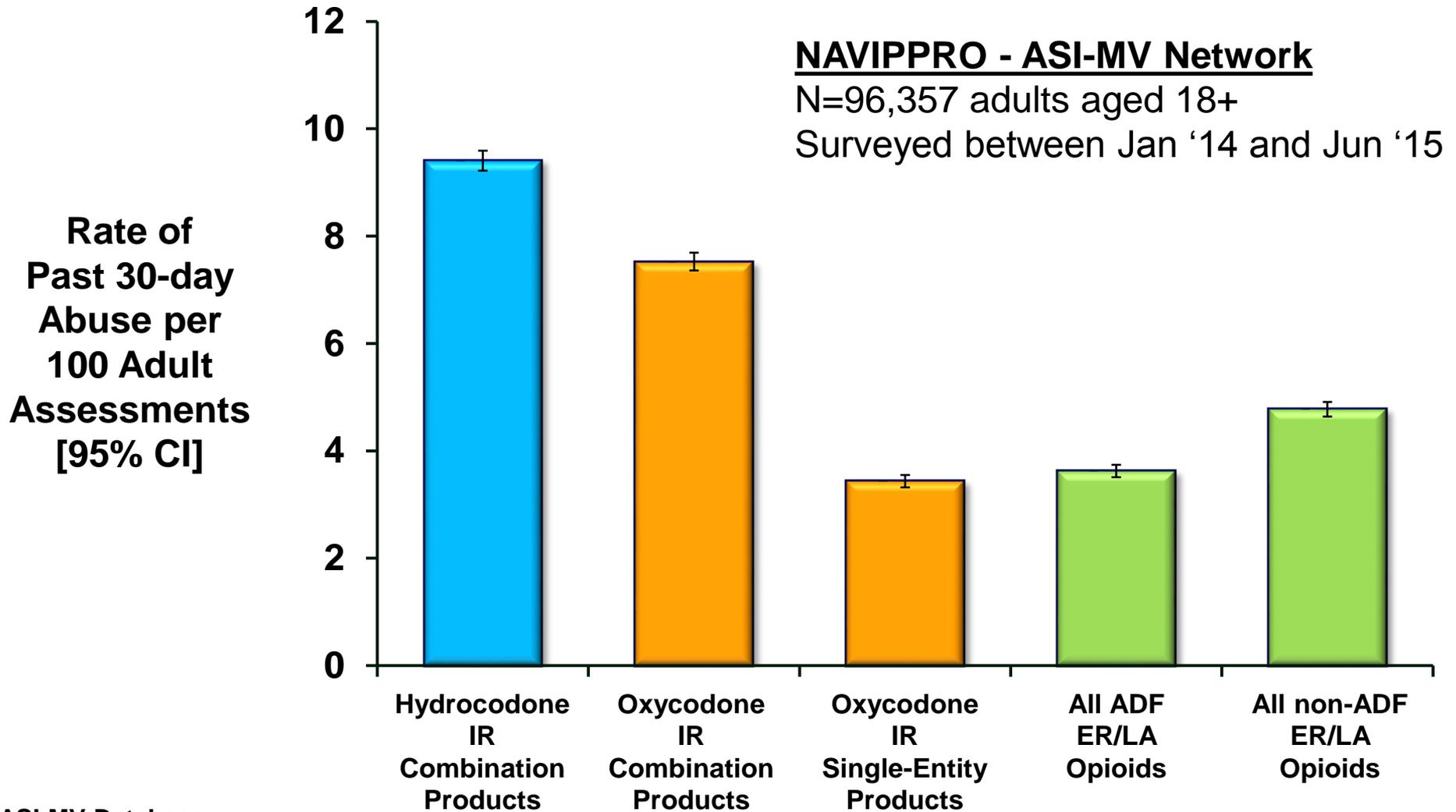


- Abusers progress to more dangerous routes as:
 - Opioid tolerance develops
 - Cost to maintain abuse patterns increases

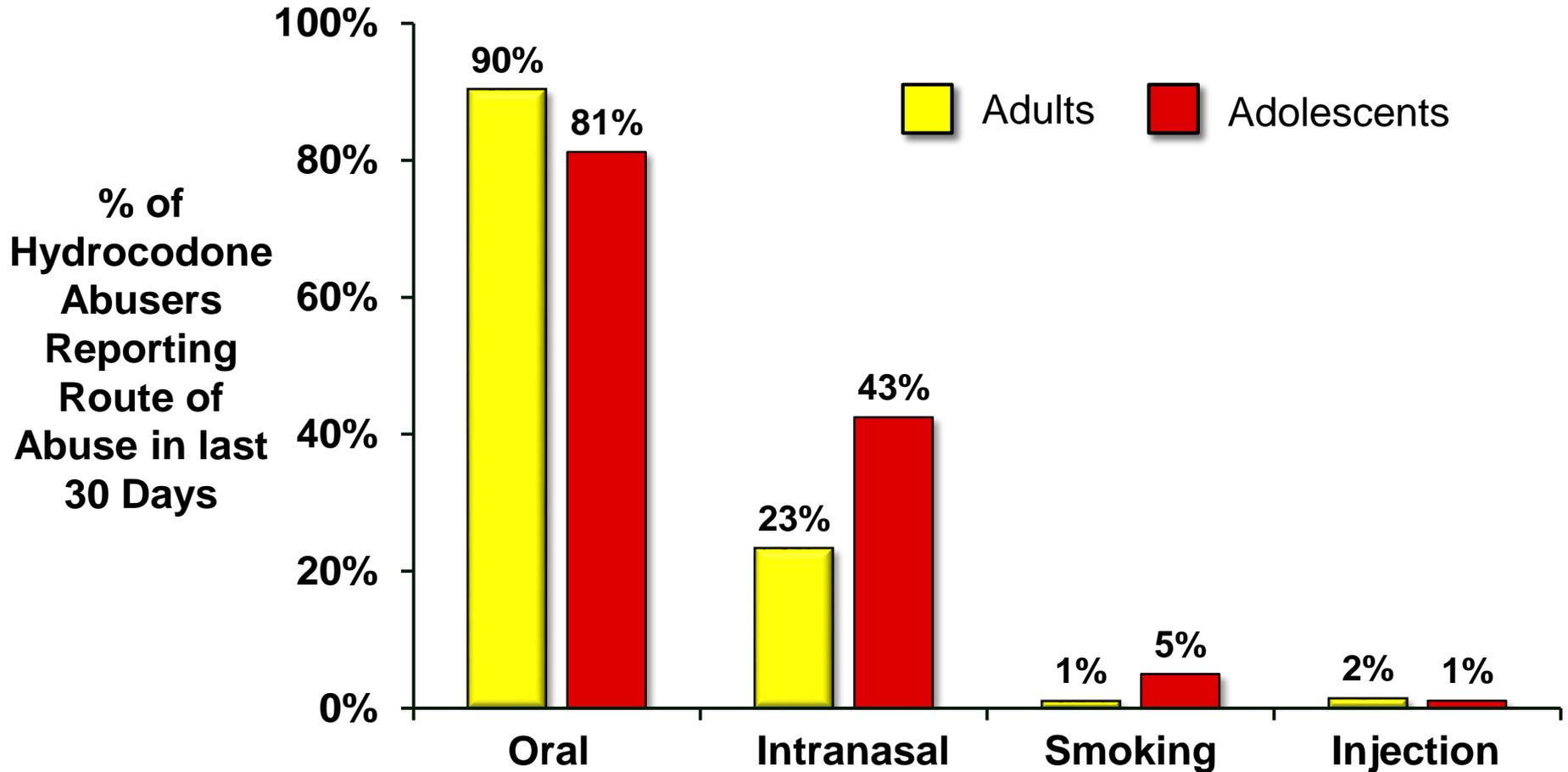
Surveillance Data Offer Window into Scope and Relevant Routes of Abuse

- Surveillance data are collected from drug abuse treatment centers
- Drug abuse surveillance is useful for understanding opioid abuse:
 - Extent of abuse
 - Routes of administration

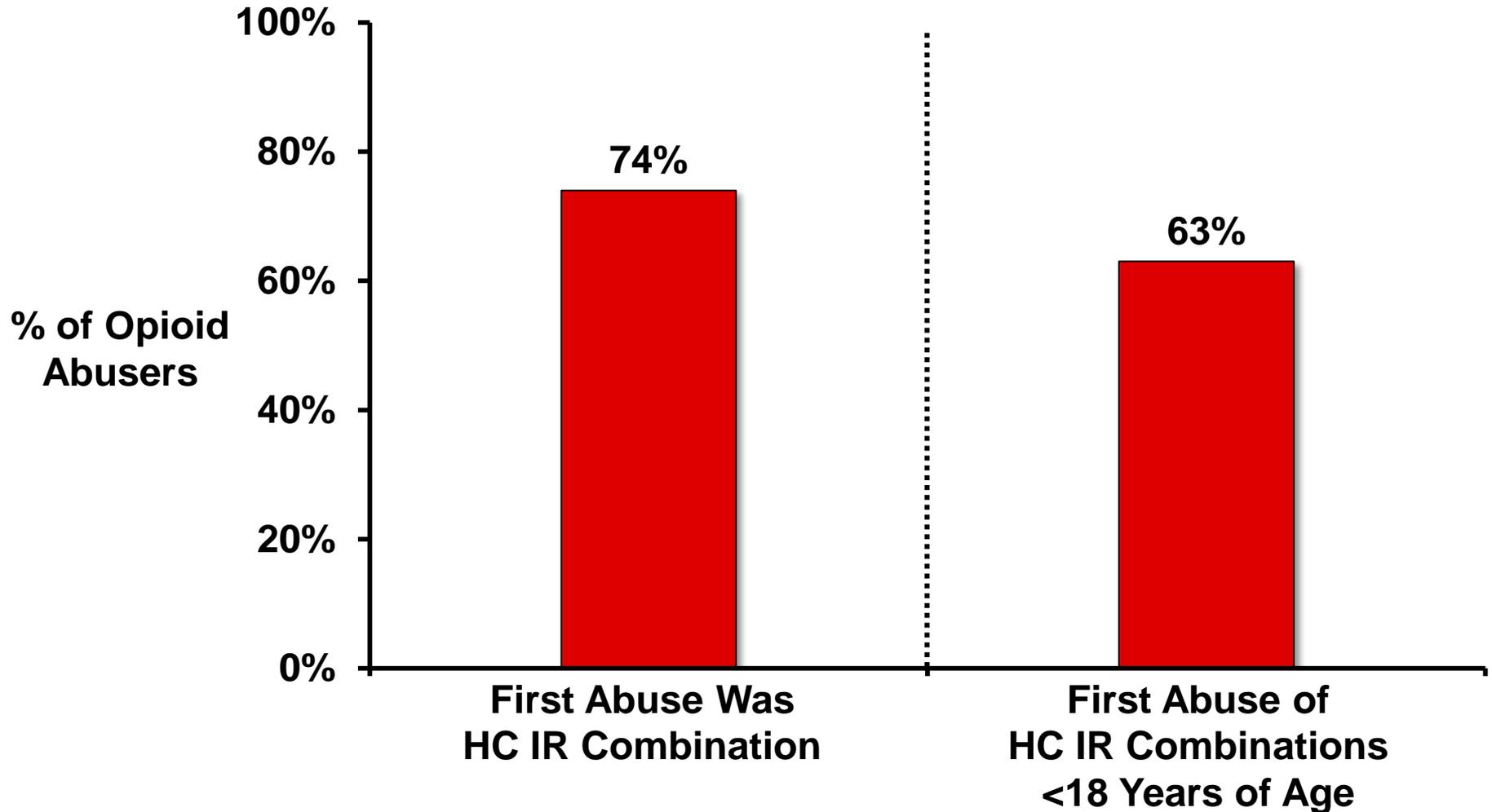
Hydrocodone IR Combination Products Are Commonly Abused

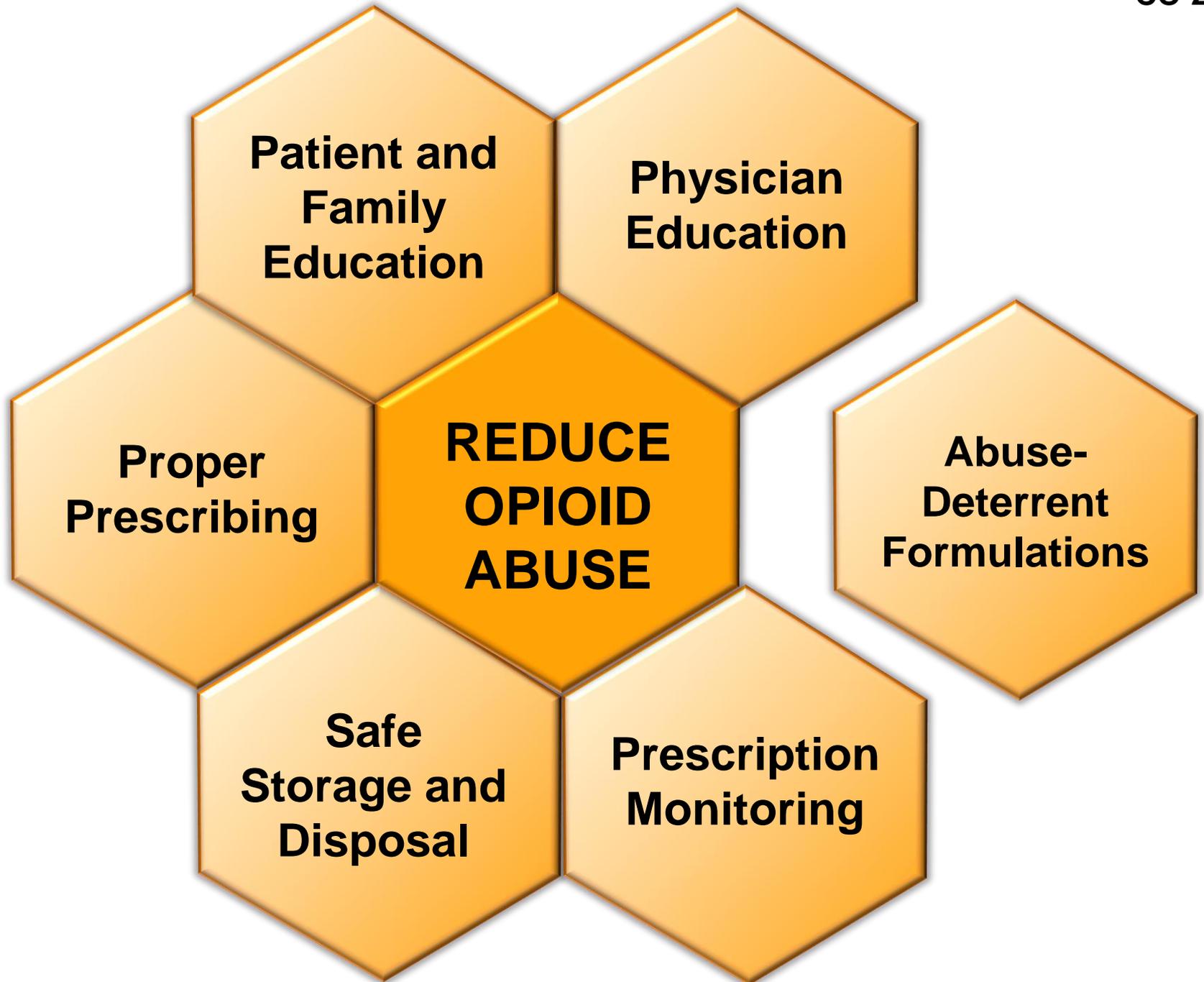


Prevalence of Abuse of Hydrocodone IR Combination Products by Route and Age



Hydrocodone IR Combinations are Often the First Opioid Abused by Young People





Development Overview

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Apadaz Abuse-Deterrence Program Followed FDA Guidance

Category 1

Lab-based *In Vitro*
Manipulation and
Extraction Studies

Evaluates the
difficulty with
which AD
properties can be
defeated or
compromised

Category 2

Pharmacokinetic
Clinical Trials

Evaluates *in vivo*
properties by
measuring
PK profiles of
AD drug vs a
comparator

Category 3

Clinical Abuse
Potential Studies

Assessment of
potential PD
effects of AD drug
vs a comparator

Rationale for Tampering Studies

- As IR product, purpose of extraction is to remove acetaminophen and isolate hydrocodone to:
 - Reduce liver toxicity at high oral doses
 - Reduce insufflation volume
 - Prepare for injection
 - Prepare for freebasing/smoking

Abuse-deterrent Products Increase Time and Effort It Takes To Extract Active Product

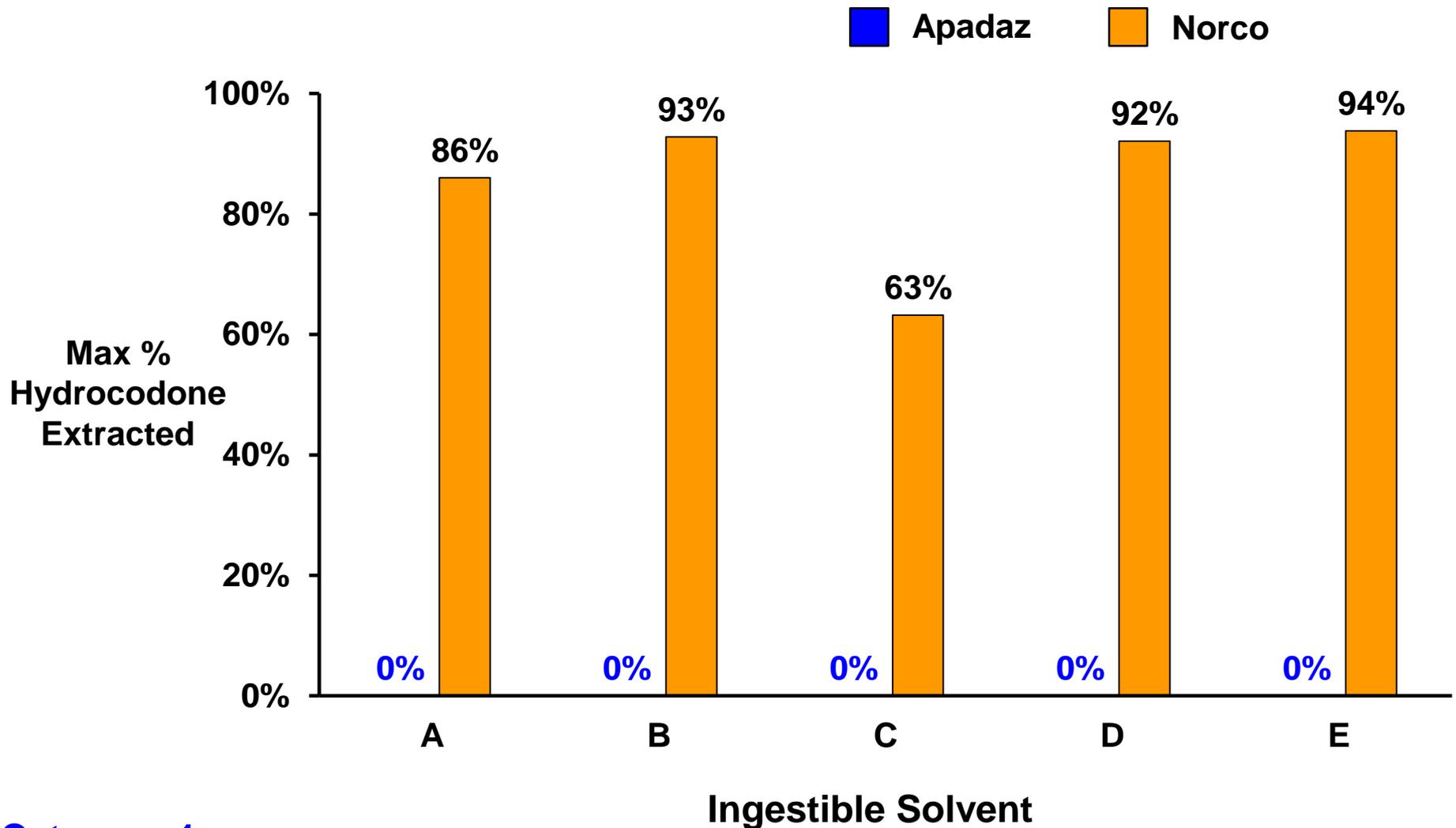
- Goal of abuse-deterrent formulation
 - Make manipulation more difficult and less attractive to abusers
 - Increase time
 - Increase effort

Extraction with Common Ingestible Solvents

5 Common Ingestible Solvents

Evaluated up to 24 hours

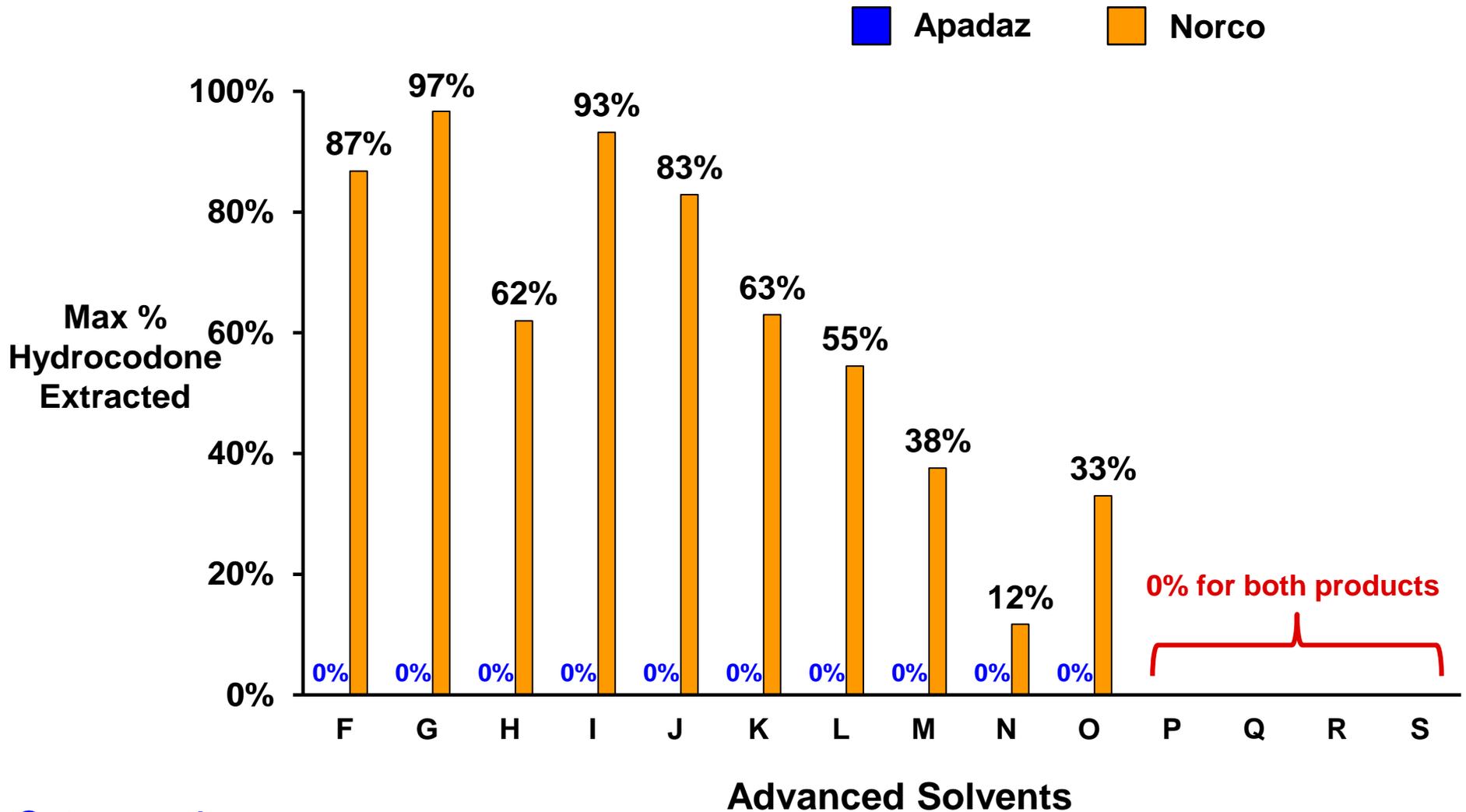
Extraction of Hydrocodone from Apadaz Was Ineffective with Common Ingestible Solvents



Extraction with Advanced Solvents

14 Advanced, Non-ingestible Solvents
Evaluated up to 24 hours

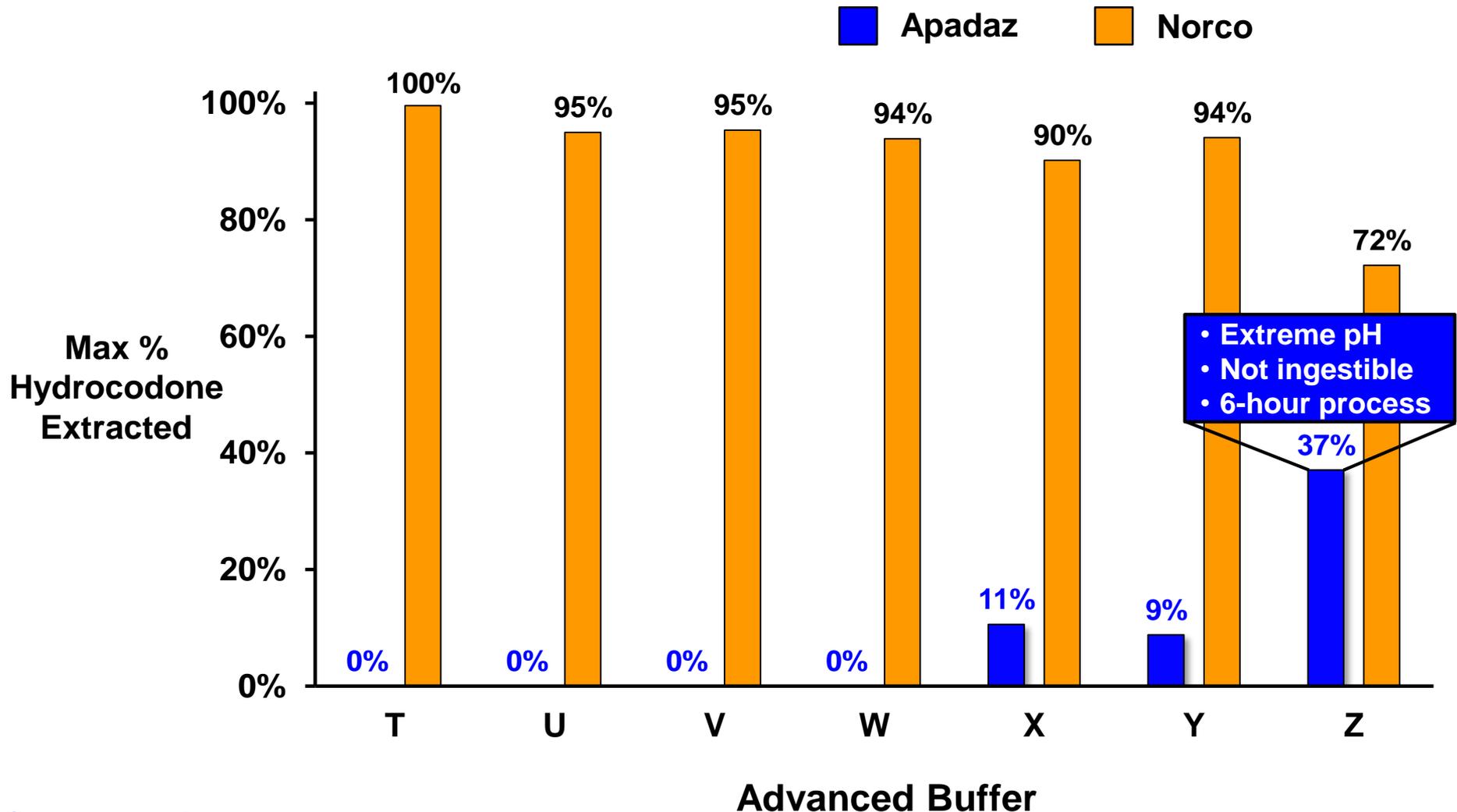
Extraction of Hydrocodone from Apadaz Was Ineffective with Advanced Solvents



Extraction with Advanced Buffers

7 Advanced Buffers of varying pH
Evaluated up to 24 hours

Extraction of Hydrocodone from Apadaz Was Inefficient with Advanced Buffers



Extraction of Hydrocodone with Heat and Continuous Agitation

20 solvents evaluated up to 24 hours

Extraction at Various Temperatures and Continuous Agitation Did Not Yield Abusable Hydrocodone

Solvent	Max % Hydrocodone Extracted	Time at Maximum Extraction	Solvent	Maximum % Hydrocodone Extracted	Time at Maximum Extraction
A	0%	-	N*	0%	-
B	0%	-	O*	0%	-
C	0%	-	R*	0%	-
D	0%	-	T**	0%	-
E	0%	-	U**	0%	-
F*	0%	-	V**	0%	-
G*	0%	-	W**	61%	24 hours
J*	0%	-	X**	60%	4 hours
K*	0%	-	Y**	63%	6 hours
L*	0%	-	Z**	46%	24 hours

*Advanced non-ingestible solvents

**Advanced buffers

Hydrolysis

Covalent bond between benzoic acid and hydrocodone has to be broken to release hydrocodone from Apadaz prodrug

Hydrolysis is Not a Feasible Way for Abusers to Tamper with Apadaz

- Fewer than 20% of samples tested released >50% of hydrocodone
 - Hydrolysis occurred only under specific conditions related to pH, with temperature modifications, over extended time
- Additional steps required to obtain abusable hydrocodone

Route-Specific Manipulations

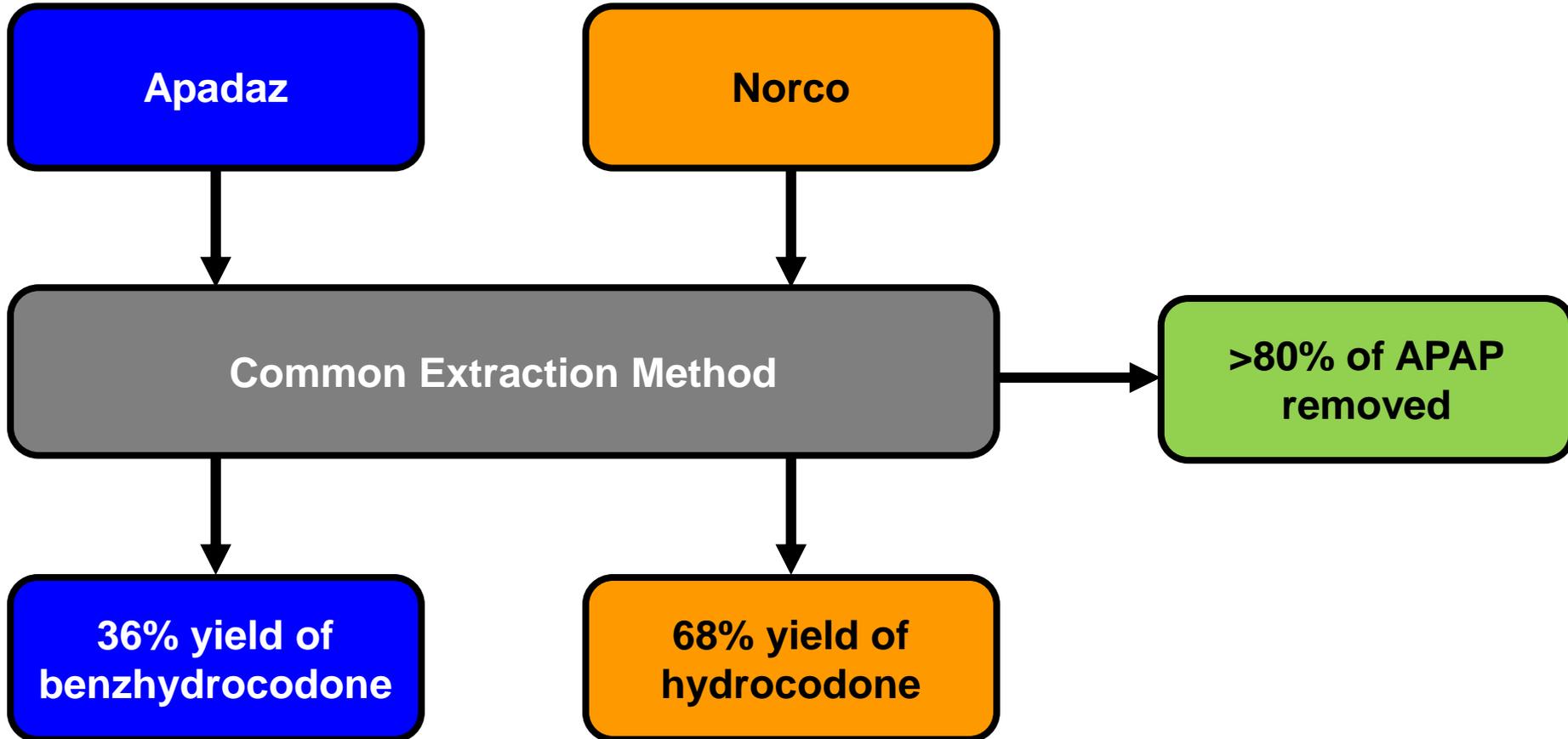
Injection

Smoking

IV Preparation was Less Efficient for Apadaz Than Norco; Syringability is Feasible

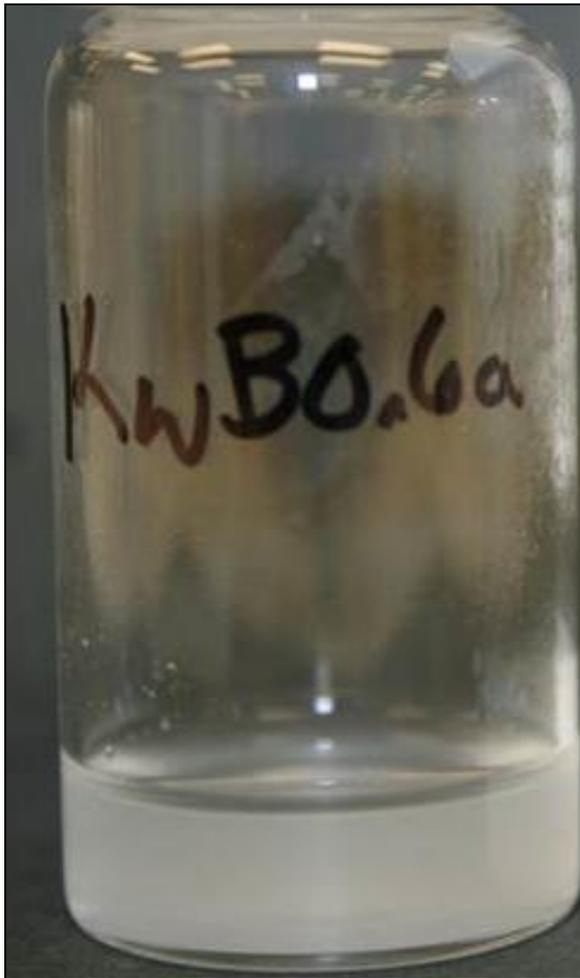
- Of 164 conditions tested:
 - 39 conditions yielded >70% hydrocodone from Norco
 - 1 condition yielded >70% benzhydrocodone from Apadaz
- Syringeability is feasible for both products
 - Only inactive prodrug can be extracted from Apadaz, and is less efficient than Norco

Common Extraction Method to Prepare IV Formulations is Inefficient for Apadaz

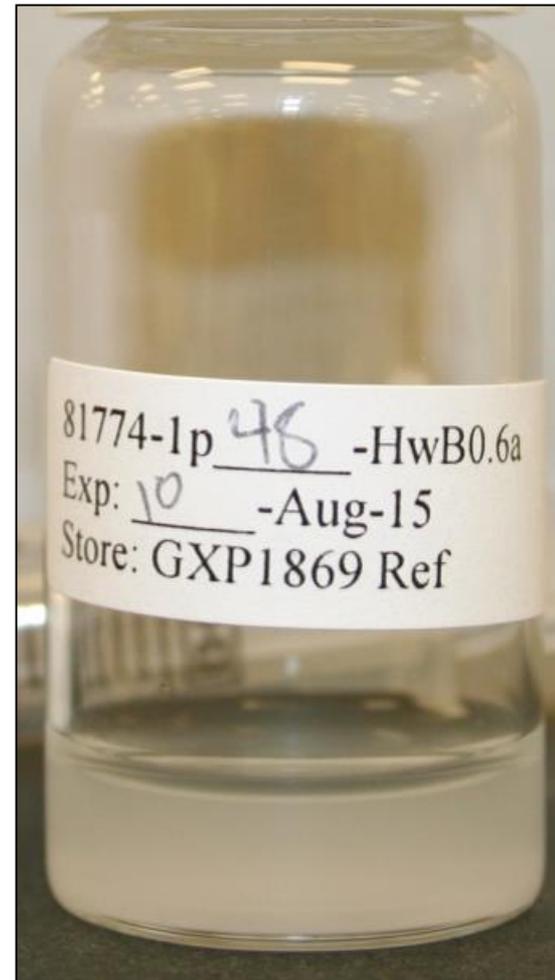


Cloudy Mock IV Preparations Due to Undissolved Excipients and Acetaminophen

Apadaz



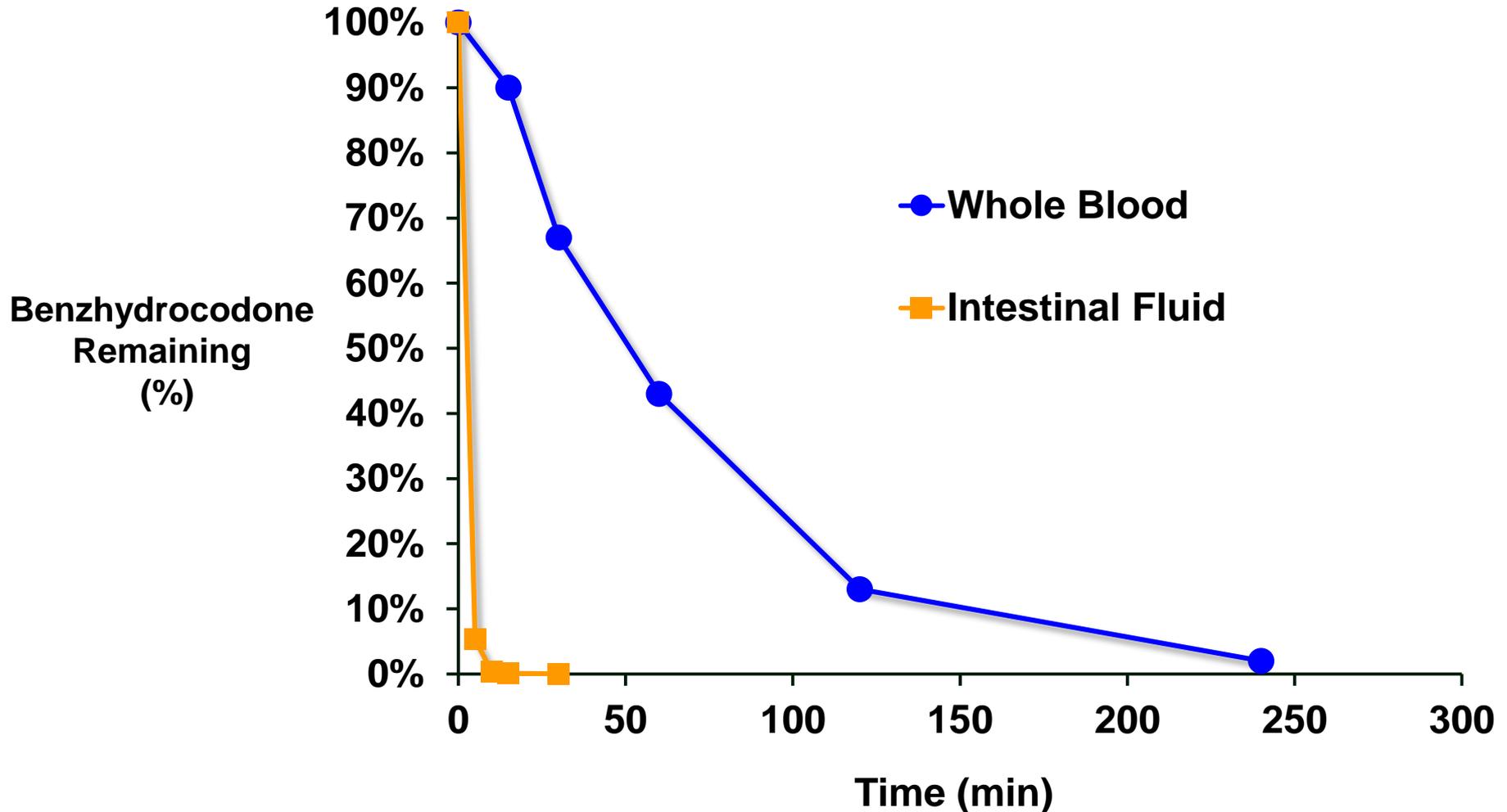
Norco



Why Would an Abuser Inject?

- Bypass first-pass metabolism
 - Cocaine and heroin
- Injection gets opioid into brain more quickly
- Faster exposures, faster highs

In Vitro Study: Stability of Apadaz in Whole Human Blood



Smoking Simulation Study

Apadaz Did Not Release Hydrocodone in Smoking Simulation Study

- Freebasing Apadaz was not possible
- Vaporizing or smoking Apadaz or benzhydrocodone at any temperature did not produce any hydrocodone

Summary of Findings from Category 1 Evaluations of Apadaz

- Common ingestible solvents not effective in extracting Apadaz
- Harsh chemicals and heat typically required over 4-24 hours for moderate hydrocodone extraction
- Preparing Apadaz for IV injection was inefficient, and prodrug converts slowly in blood
- Smoking/freebasing Apadaz tablets not effective

Clinical Abuse-Deterrence Studies

Lynn Webster, M.D.

Vice President, Scientific Affairs

PRA Health Sciences

Apadaz Abuse-Deterrence Program Followed FDA Guidance

Category 1

Lab-based *In Vitro*
Manipulation and
Extraction Studies

Evaluates the
difficulty with
which AD
properties can be
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Category 2

Pharmacokinetic
Clinical Trials

Study A01: Oral abuse
Study A02: IN abuse
Study A03: IN abuse with APIs

Category 3

Clinical Abuse
Potential Studies

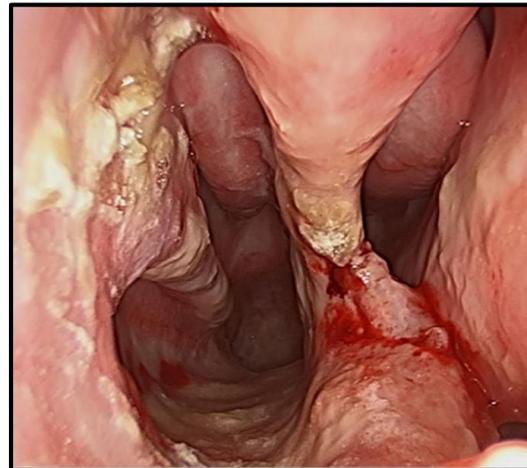
Health Consequences of Intranasal Abuse of Hydrocodone Combination Products

- Nasal/facial pain
- Nasal obstruction
- Necrosis of nasal passages & soft palate
- Fungal rhinosinusitis
- Septal and palatal perforation

Nasal Septal Injury from IN Hydrocodone-Acetaminophen Abuse



Pre-debridement



Post-debridement

Why Does an Abuser Snort Opioids?

- Snorting gets opioids into circulation faster
 - Circumvents first-pass metabolism
 - Provides greater exposures and faster highs

How Do Abusers Snort Hydrocodone Combination Products?

1. Without manipulation (Study A02)
2. After removing APAP, using “Common Tampering Method” (Study A03)
 - Reduces snorting volume
 - Reduces potential for liver toxicity

Drug Liking E_{\max} is a Relevant Primary Endpoint to Evaluate Abuse-Deterrent ER Opioids

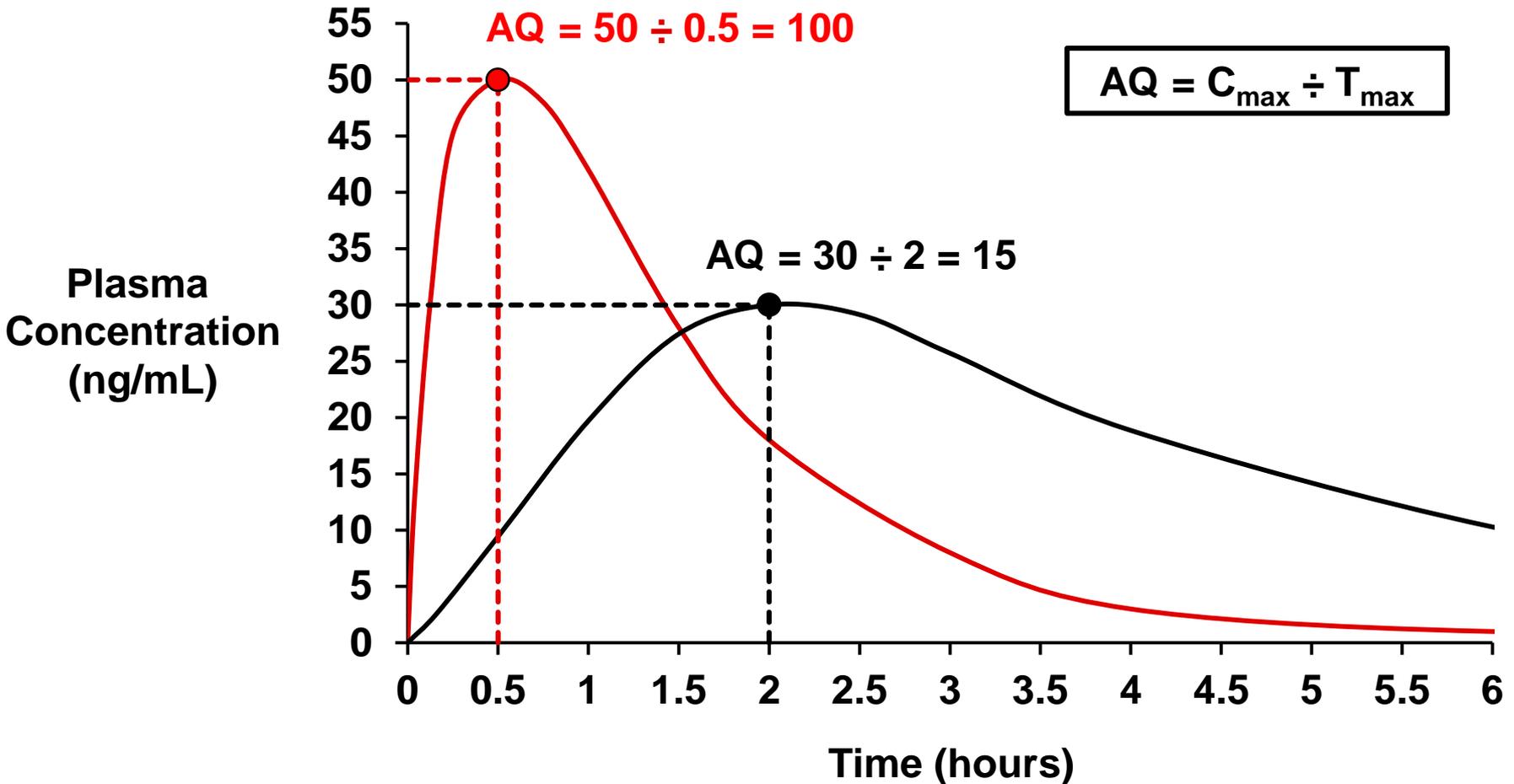
- Primary endpoint: difference in maximum Drug Liking (E_{\max})¹
 - Calculated as the average of every subject's maximum liking, regardless of time it occurred
- Evaluates manipulated AD ER vs. non-AD IR product at high dose
- Lower E_{\max} expected if AD ER product does not dose dump

Rationale of Drug Liking E_{\max} Harder to Apply to Abuse-Deterrent IR Opioids

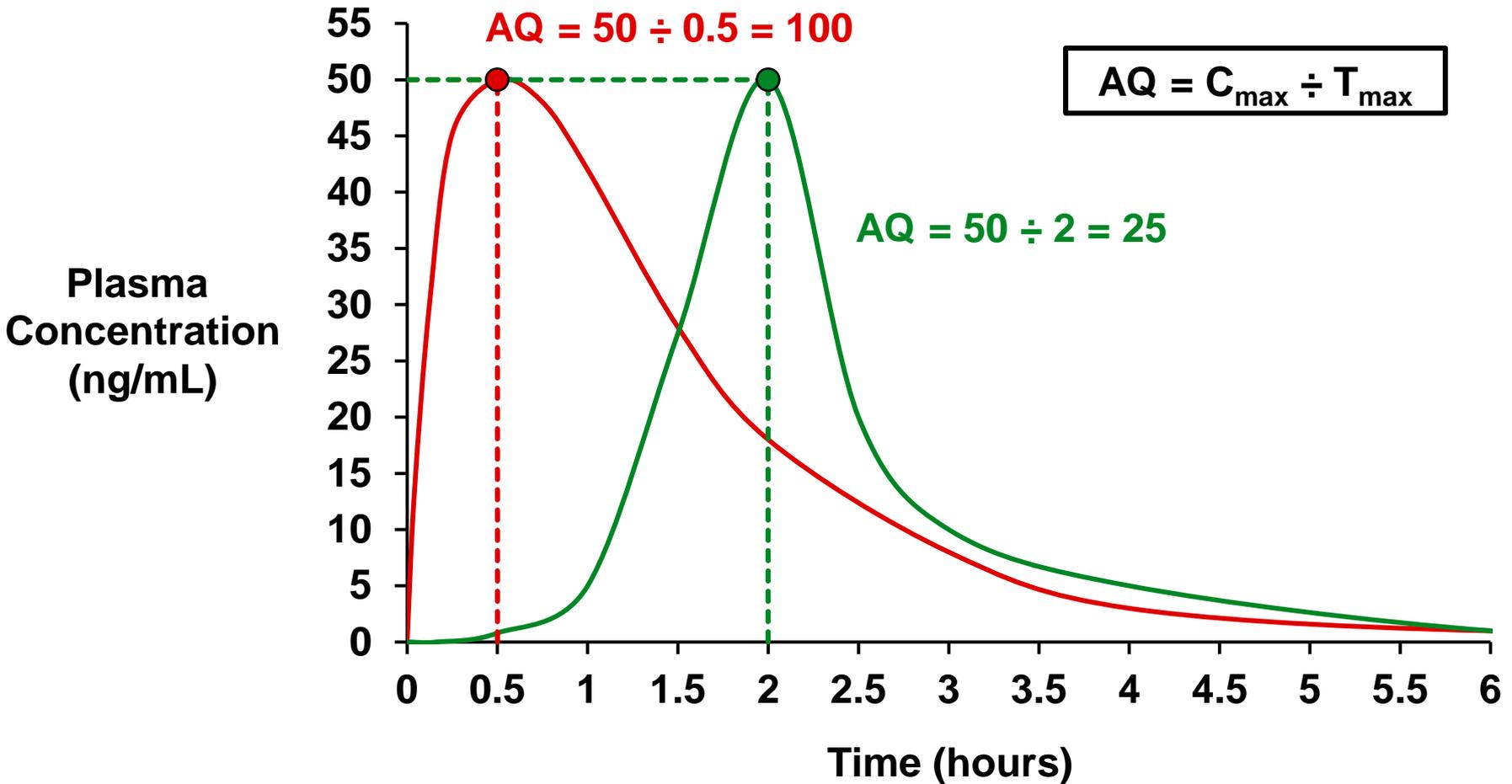
- Differences between IR and ER in opioid quantity and timeframe of proper opioid delivery
 - ER products release more opioid *slowly*
 - IR products release less opioid *quickly*
- Time course of Drug Liking, particularly at early time points, may be more relevant than E_{\max}
- Drug Liking E_{\max} does not account for time

Abuse Quotient

Rate of Rise in Drug Levels Evaluated Using Abuse Quotient



Abuse Quotient Simulation



Study A02: Intranasal Human Abuse Potential

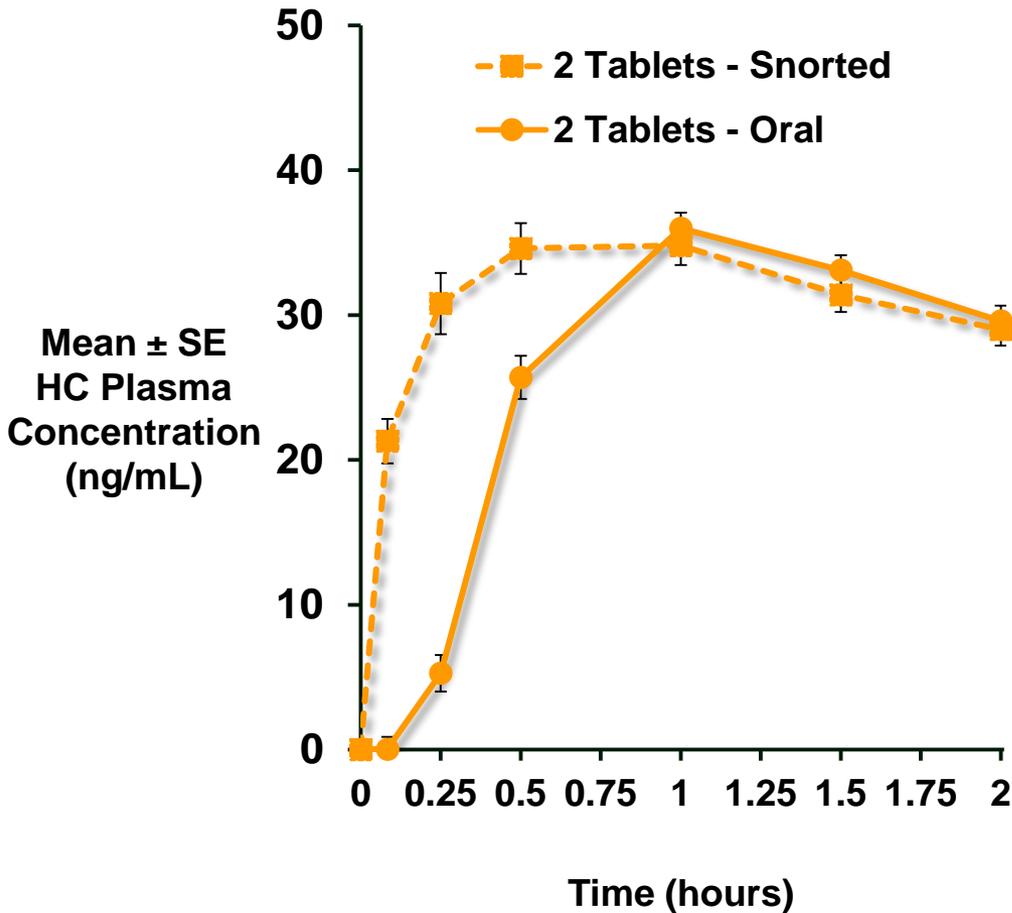
Apadaz vs. Norco

Part A: Dose selection (2 tablets selected as largest volume that produced reliable Drug Liking scores)

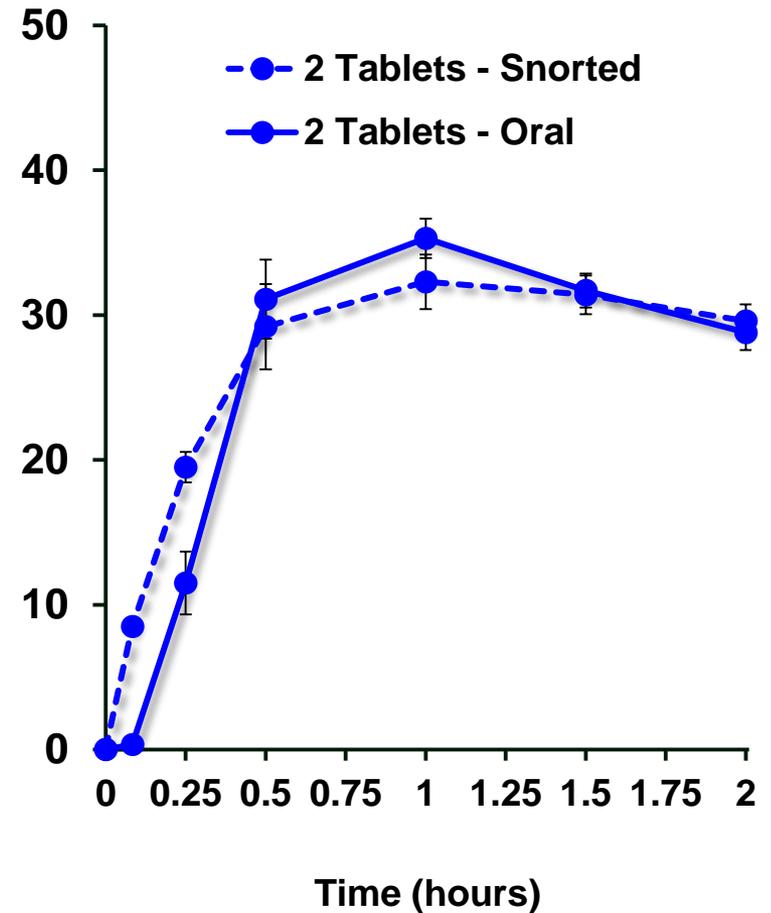
Part B: Bioavailability and Drug Liking

Snorting Apadaz Does Not Accelerate Exposure to Hydrocodone

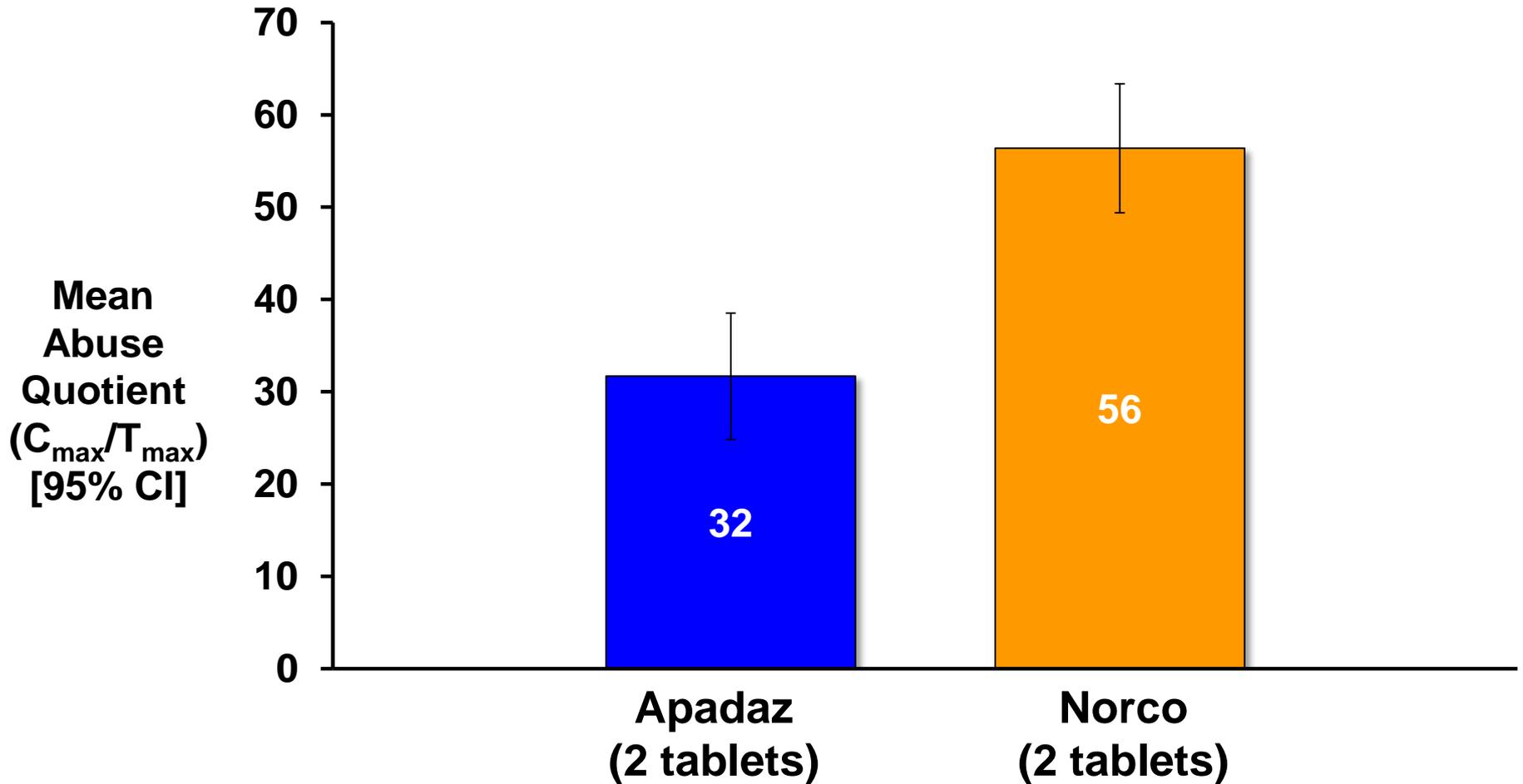
Norco



Apadaz



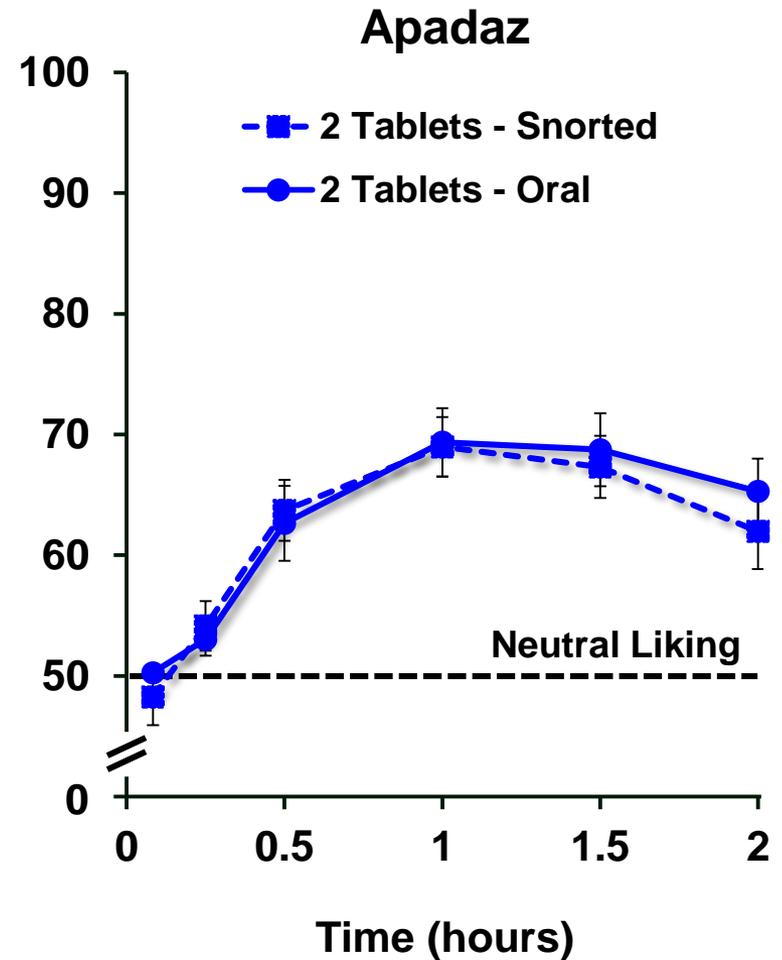
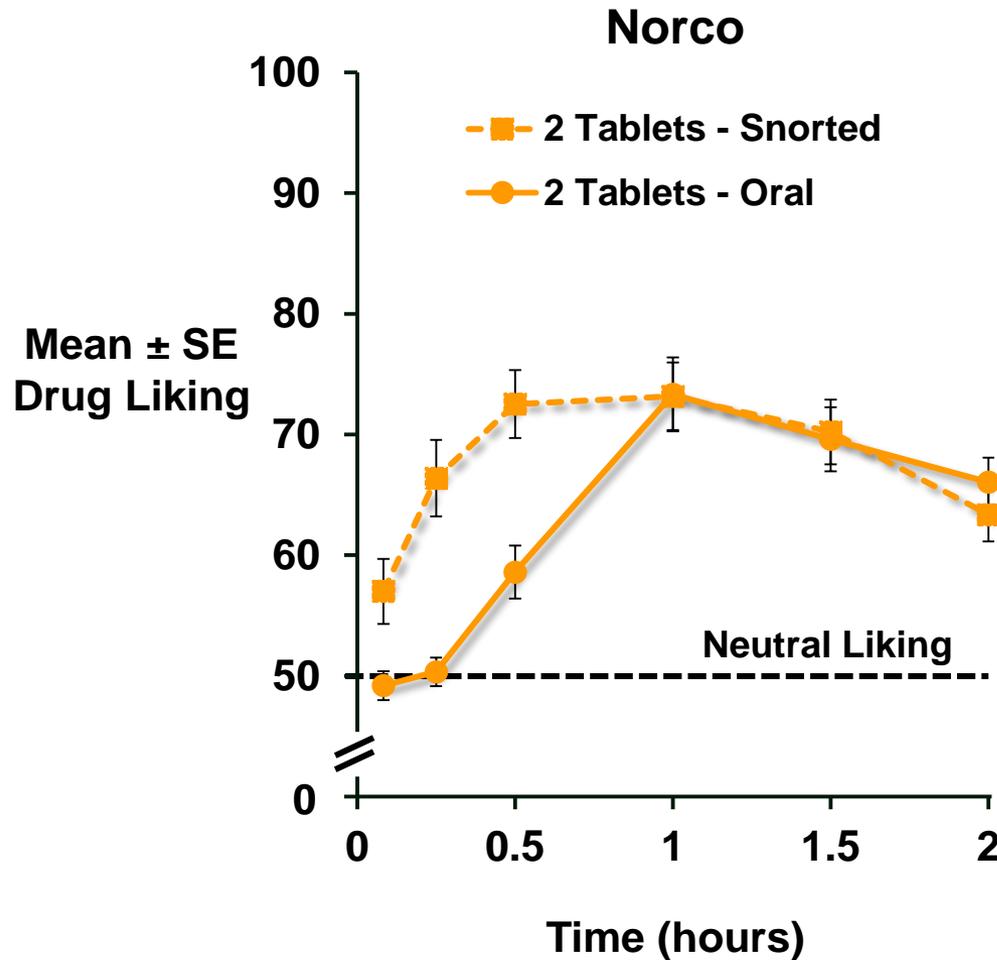
Apadaz Has Lower Abuse Quotient Than Norco When Snorted



No Difference in Drug Liking E_{max} in Study A02

Drug Liking	Intranasal (2 Tablets)	
	Apadaz	Norco
E_{max} , mean	75.9	79.0
P-value	0.28	

Snorting Apadaz Does Not Increase Drug Liking at Early Time Points



Apadaz Associated with Lower Ease of Insufflation

- Ease of Insufflation Score
0=Very Easy 100 = Very Difficult

Variable	Mean (SD)		Difference (P-value)
	Apadaz	Norco	
Ease of Insufflation (0-100 scale)	57 (36)	43 (33)	14 (p = 0.01)

Apadaz Associated with More Adverse Nasal Effects When Snorted

■ Nasal Effect Assessment Score

0=None 1=Mild 2=Moderate 3=Severe

Variable	Mean (SD)		Difference (P-value)
	Apadaz	Norco	
Burning	1.6 (1.0)	0.7 (0.7)	-1.0 (<0.001)
Pain	1.0 (1.0)	0.5 (0.8)	-0.5 (<0.001)
Blow	1.5 (0.9)	1.0 (0.9)	-0.5 (<0.001)
Irritate	1.5 (1.0)	0.7 (0.7)	-0.8 (<0.001)
Congestion	1.5 (1.0)	1.0 (0.8)	-0.5 (<0.001)
Discharge	1.4 (1.0)	0.8 (0.9)	-0.7 (<0.001)

Apadaz Associated with Higher Frequency of Nasal-Related Adverse Events

Adverse Event	Apadaz Intranasal (N=44)	Norco Intranasal (N=43)
Respiratory, thoracic and mediastinal disorders	66%	21%
Nasal discomfort	36%	5%
Nasal congestion	16%	5%
Rhinorrhea	16%	9%
Throat irritation	14%	7%
Dry throat	2%	0%
Oropharyngeal pain	2%	2%
Upper-airway cough syndrome	0%	2%

Study A03: Intranasal Bioavailability Study with Abuse Potential Assessments

Benzhydrocodone vs. Hydrocodone Bitartrate

- Subjects administered equivalent amounts of the API found in 2 tablets

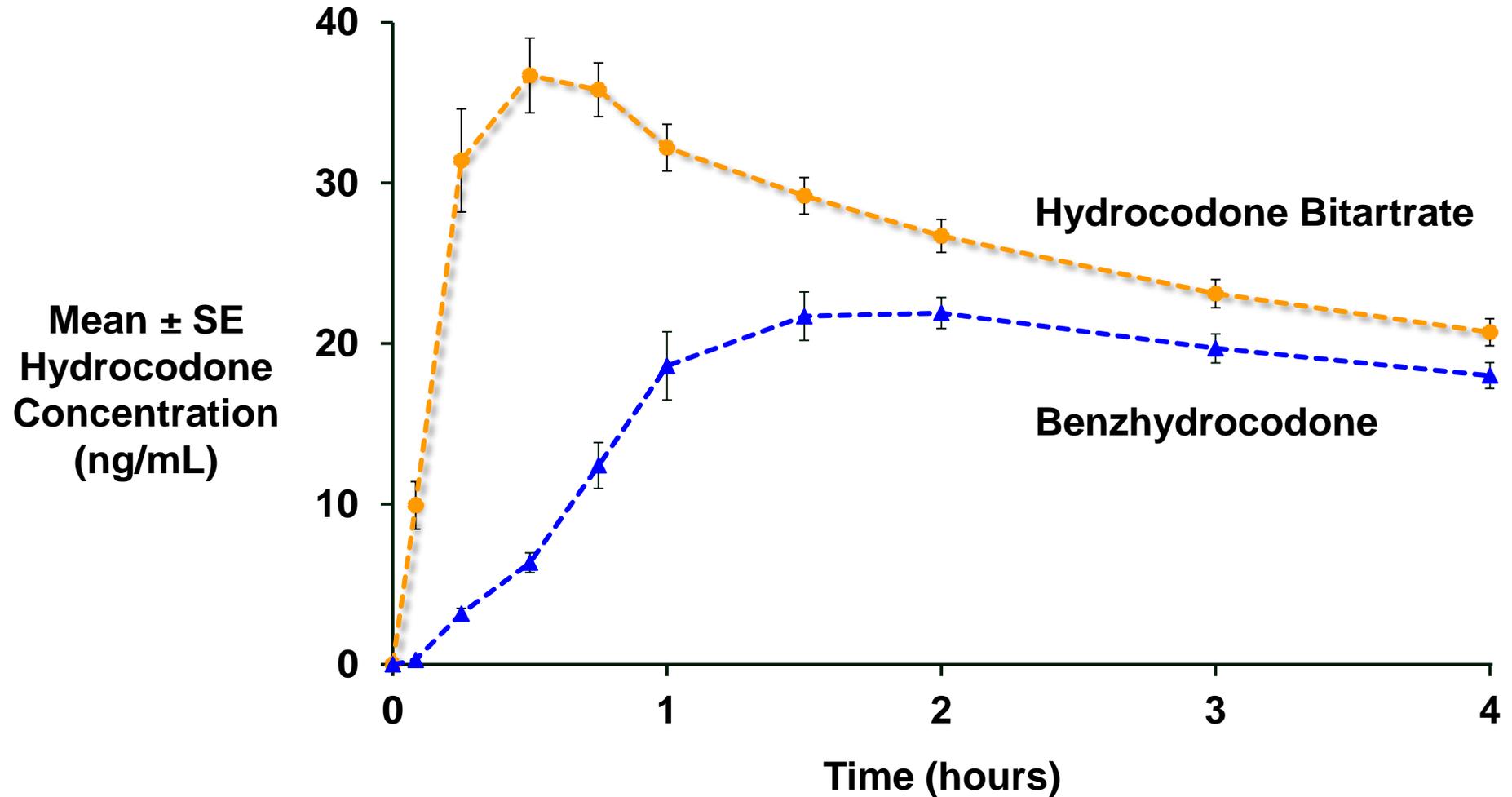
Study A03: Intranasal Bioavailability Study with Abuse Potential Assessments

- No drug discrimination phase
- Lack of enrichment made it less likely to find differences in Drug Liking

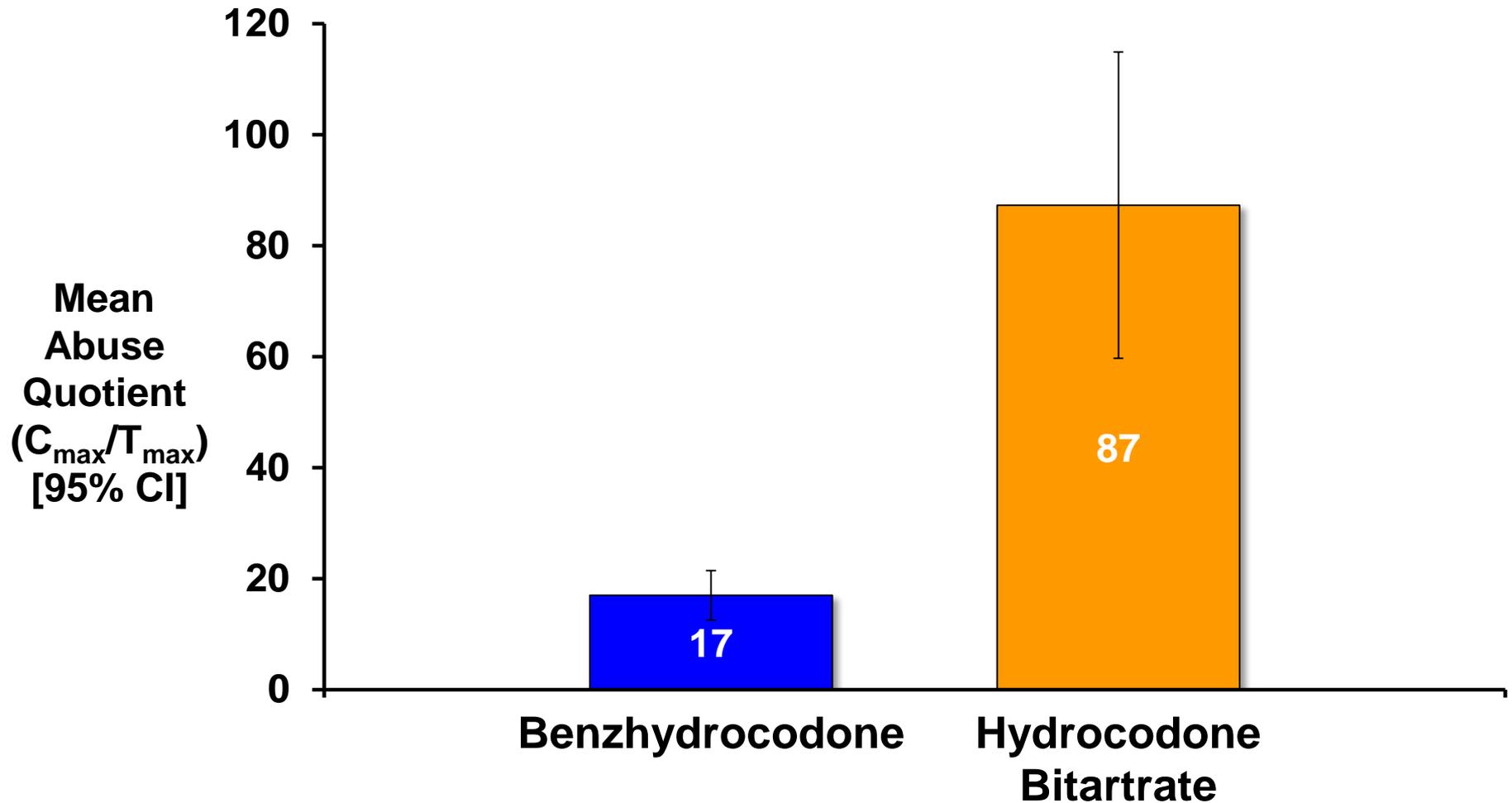
Common Extraction Method Applied to Reduce Bulk for Snorting Is Inefficient for Apadaz

- Practical Extraction results:
 - >80% of APAP removed for both products
 - 68% yield of hydrocodone from Norco
 - 36% yield of benzhydrocodone from Apadaz
- Study A03 assumptions (assumes best case):
 - 100% of APAP removed
 - 100% yield of hydrocodone and benzhydrocodone

Intranasal Administration of Apadaz Prodrug Leads to Lower HC Release



5-Fold Lower Abuse Quotient With Snorted Apadaz Prodrug

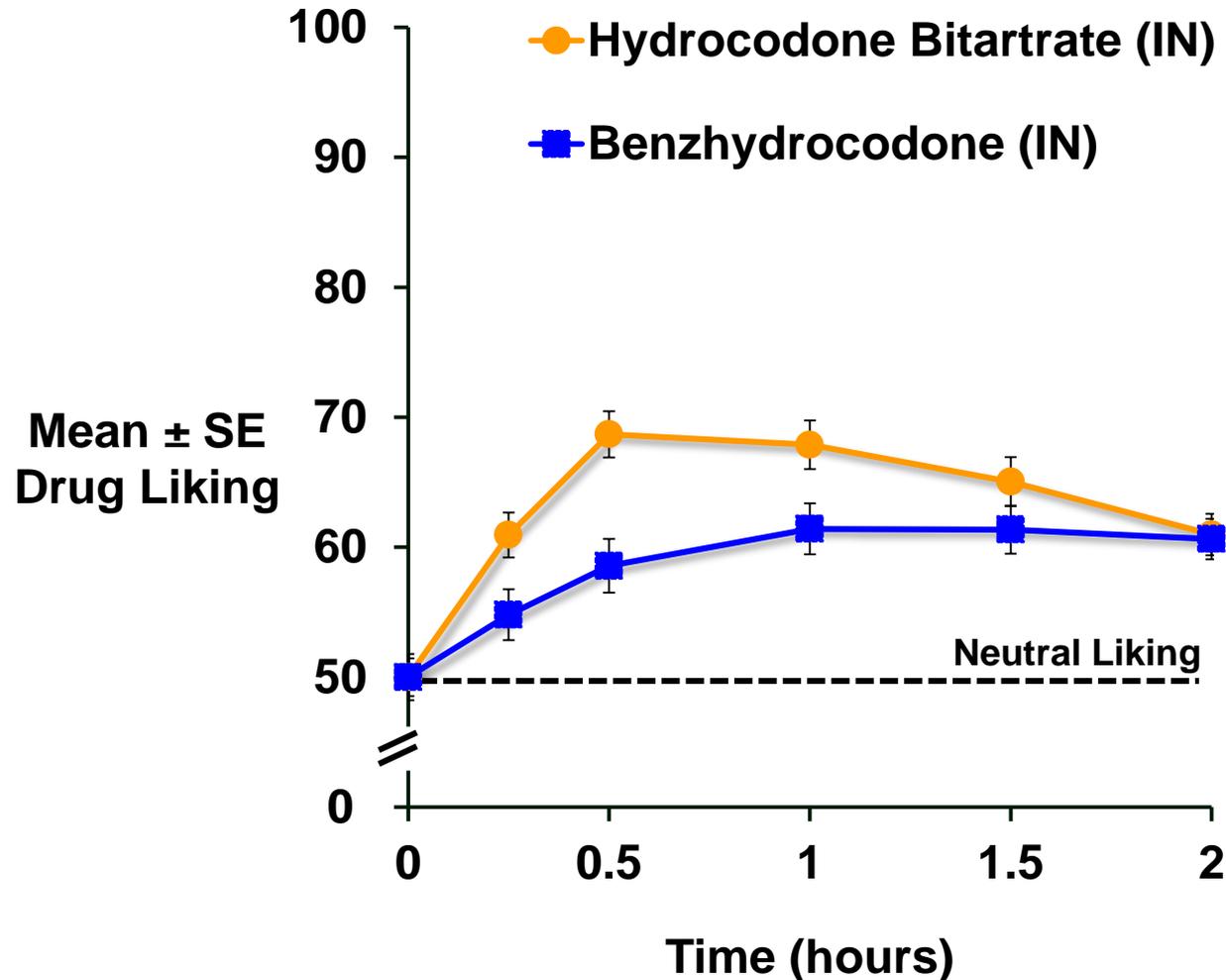


Differences Observed in Drug Liking

E_{\max} with APIs

Drug Liking	Intranasal	
	Benzhydrocodone	Hydrocodone Bitartrate
E_{\max} , mean	67.4	73.2
P-value	0.004	

Differences in Drug Liking with APIs Over Time Mirrored PK Findings in Study A03



Snorting Apadaz Prodrug Associated with Lower Ease of Insufflation than Hydrocodone API

Variable	Mean (SD)		Difference (P-value)
	Benzhydrocodone	Hydrocodone Bitartrate	
Ease of Insufflation	79 (20)	66 (26)	13 (p = 0.004)

Summary of Findings from Intranasal Clinical Abuse Potential Studies of Apadaz

- **With Apadaz, abusers do not achieve the rapid highs they seek from snorting**
- Snorting with APAP (A02)
 - Unlike Norco, Apadaz produced nearly identical profiles for PK and Drug Liking compared to oral
- Snorting without APAP (A03)
 - Most common tampering method to remove APAP is half as efficient with Apadaz
 - Even at equimolar doses, benzhydrocodone produced lower hydrocodone exposure and Drug Liking
- Apadaz was harder to snort than Norco, with or without APAP

Post-Market Surveillance Future Studies

Travis Mickle, Ph.D.

Co-Founder and Chief Executive Officer
KemPharm, Inc.

Epidemiologic Approach to Post-Market Surveillance and Evaluation of Abuse Profile

- Epidemiologic program evaluating abuse and routes of abuse
- Continued market surveillance
 - Specific for Apadaz
 - Generally related to entire opioid market

Several Sources of Post-Marketing Data

- Continuation of current market surveillance similar to pre-approval approach
- NAVIPPRO database
 - **ASI-MV[®] Network** (adults)
 - **CHAT[®]** (adolescents)
 - **WIS[®]: Internet Monitoring**
- Additional sources as needed for support

Surveillance Monitoring and Epidemiological Studies to Monitor Use and Abuse of Apadaz

- Surveillance monitoring for abuse
 - Initial abuse expected to be low
 - Monitoring tools to provide early assessment of abuse potential
- Post-market epidemiological studies
 - Primary study assessing rates and routes of abuse
 - Supportive study to monitor and assess discussion among recreational drug abusers

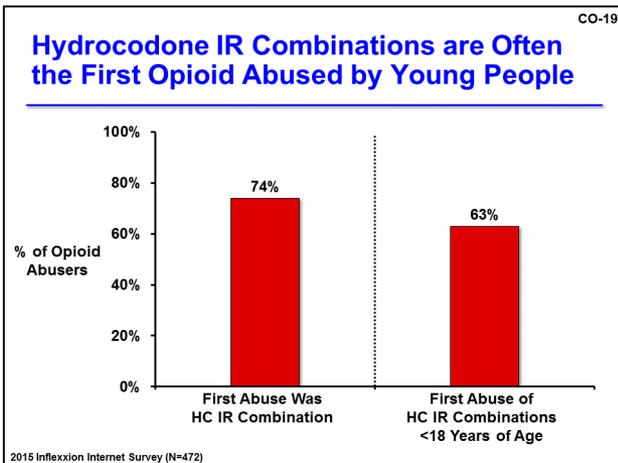
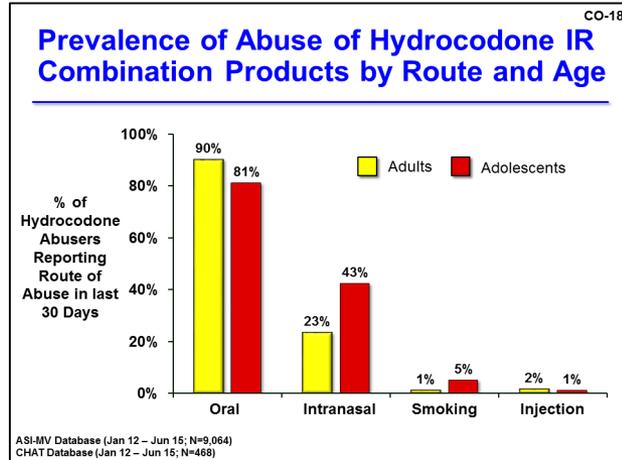
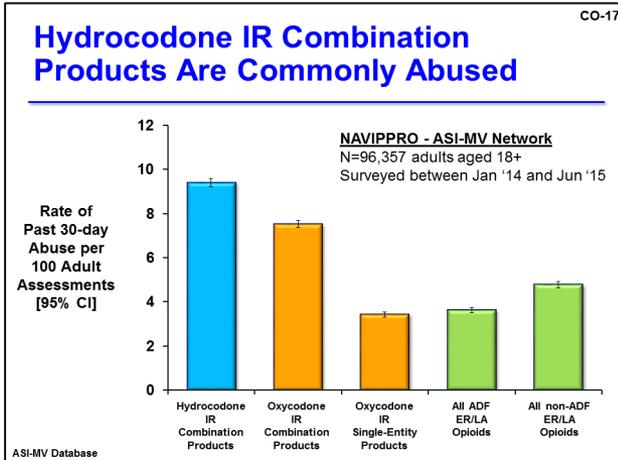
Benefit-Risk Profile

Jeffrey Gudin, M.D.

Director, Pain Management and Palliative Care
Englewood Hospital and Medical Center

Clinical Instructor, Anesthesiology
Icahn School of Medicine, Mt. Sinai

Epidemiologic Data Illustrate the Need for Abuse-Deterrent Hydrocodone IR Combination



Goal: Prevention of Progression from Oral Route to More Dangerous Routes of Administration CO-15

Oral Snorting Smoking Injection

Progression of Abuse

- Abusers progress to more dangerous routes as:
 - Opioid tolerance develops
 - Cost to maintain abuse patterns increases

Apadaz: First Abuse-Deterrent Hydrocodone IR Combination Product

Physical/ Chemical Manipulations

- Prodrug: No impact of physical tampering on release
- Prodrug is very difficult to chemically manipulate

Smoking

- Apadaz cannot be smoked/vaporized to release HC

IV injection

- Extraction for injection is inefficient and expensive
- Slow conversion of inactive prodrug to HC in blood

Intranasal

When Crushed and Snorted:

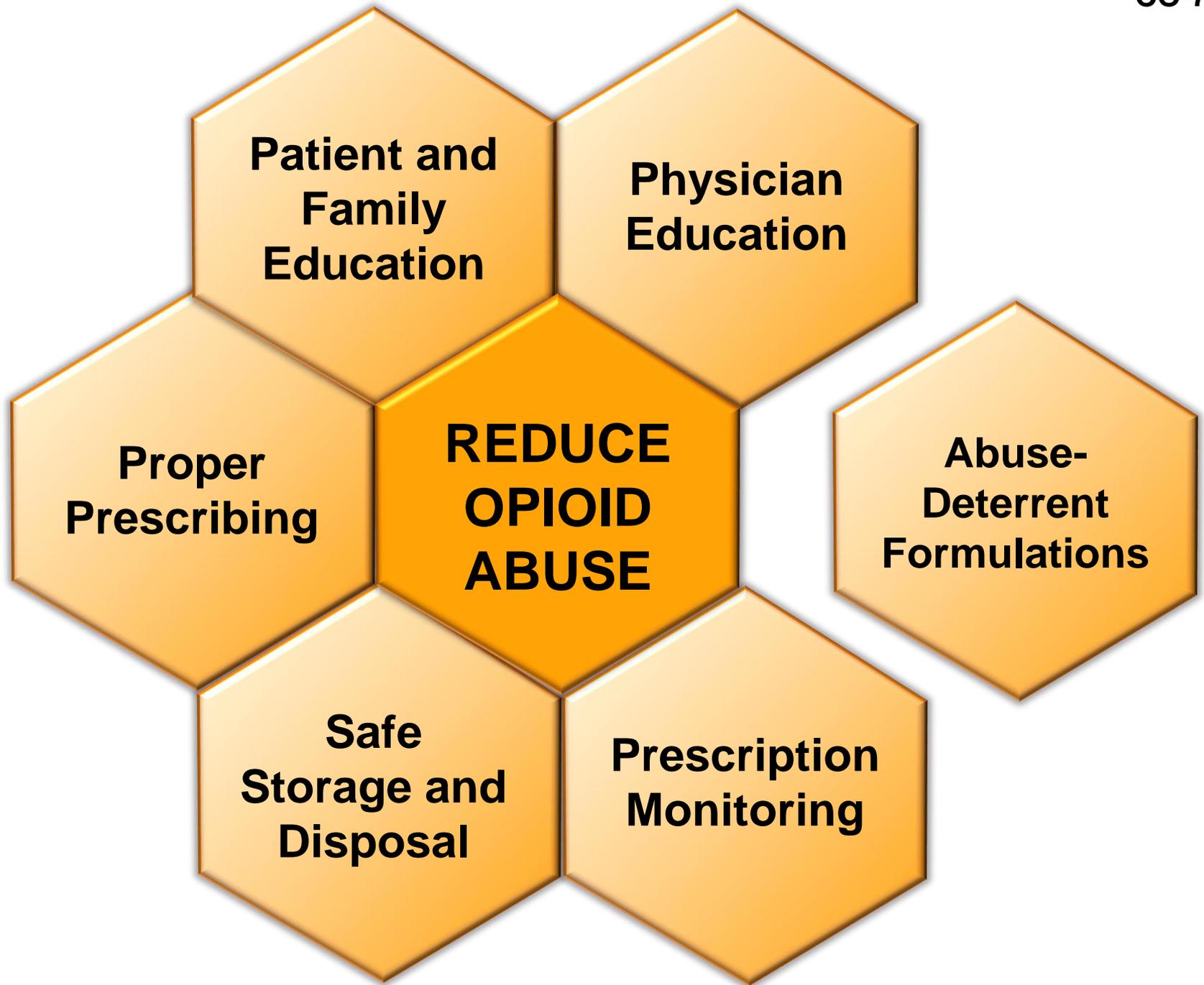
- Abusers don't get more rapid exposure or faster highs
- No advantage over oral administration
- More nasal AEs, harder to snort

When Crushed, APAP Extracted, and Snorted:

- Extraction yields ½ as much API compared to Norco
- Lower exposures and Drug Liking vs. Norco API
- Harder to snort

Apadaz Bioequivalent to Hydrocodone IR Combination Products; No Additional Risk

- Similar hydrocodone, hydromorphone and acetaminophen exposures to currently marketed products when taken as intended
- No clinically significant effect of food
- Safety of Apadaz in patients would be similar to existing products
 - No systemic exposure to prodrug
 - Ligand (benzoic acid) is naturally-occurring in berries



**Patient and
Family
Education**

**Physician
Education**

**Proper
Prescribing**

**REDUCE
OPIOID
ABUSE**

**Abuse-
Deterrent
Formulations**

**Safe
Storage and
Disposal**

**Prescription
Monitoring**

**Apadaz™
(immediate-release benzhydrocodone
with acetaminophen) for the Treatment
of Acute Pain**

May 5, 2016

KemPharm, Inc.

Joint Meeting of the Anesthetic and Analgesic Drug
Products Advisory Committee and the Drug Safety and
Risk Management Advisory Committee

Backup Slides Shown

Drug Liking Study A02

Parameter	Intranasal				Oral			
	Apadaz		Norco		Apadaz		Norco	
	Mean	SD	Mean	SD	Mean	SD	Mean	SD
AUE _{0-0.5}	30.2	6.3	36.1	8.9	30.8	3.9	28.2	4.6
P-value	<0.0001				0.1244			
AUE ₀₋₁	63.5	12.6	72.6	16.4	63.7	11.7	62.3	11.6
P-value	<0.0001				0.4689			
AUE ₀₋₂	129.8	26.6	141.8	30.3	131.7	26.3	131.9	25.1
P-value	0.0079				0.9896			
AUE ₀₋₄	249.6	53.3	262.3	51.8	249.5	47.5	251.5	41.2
P-value	0.1219				0.8270			
AUE ₀₋₈	467.0	83.2	477.0	77.6	456.2	70.2	459.6	71.9
P-value	0.4112				0.7991			
AUE ₀₋₂₄	1294	187.0	1281	198.6	1264	83.1	1263	127.2
P-value	0.5847				0.9610			

Earlier Exposure to Abuse of Hydrocodone IR Combination Products Associated with Non-Oral Routes of Abuse

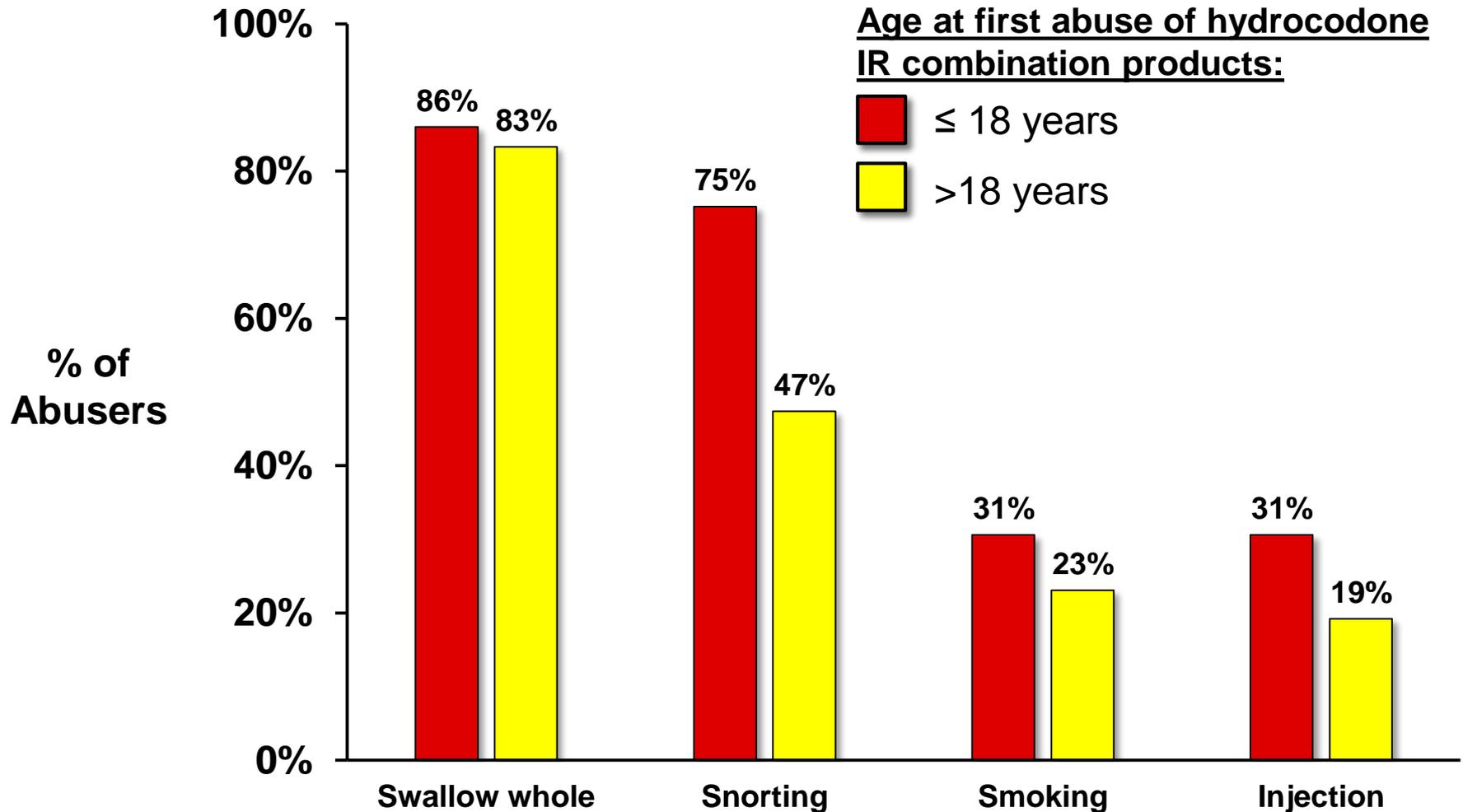
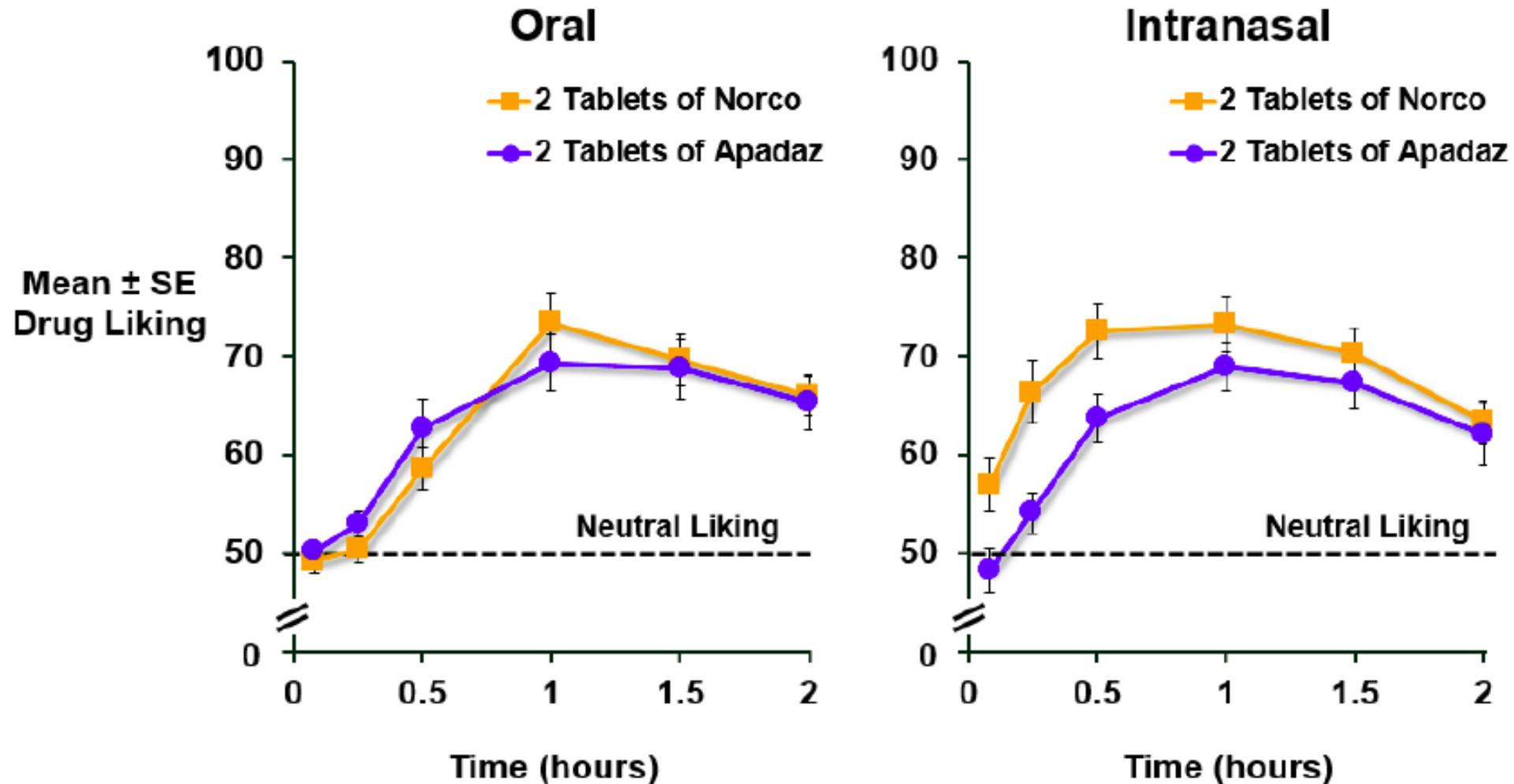
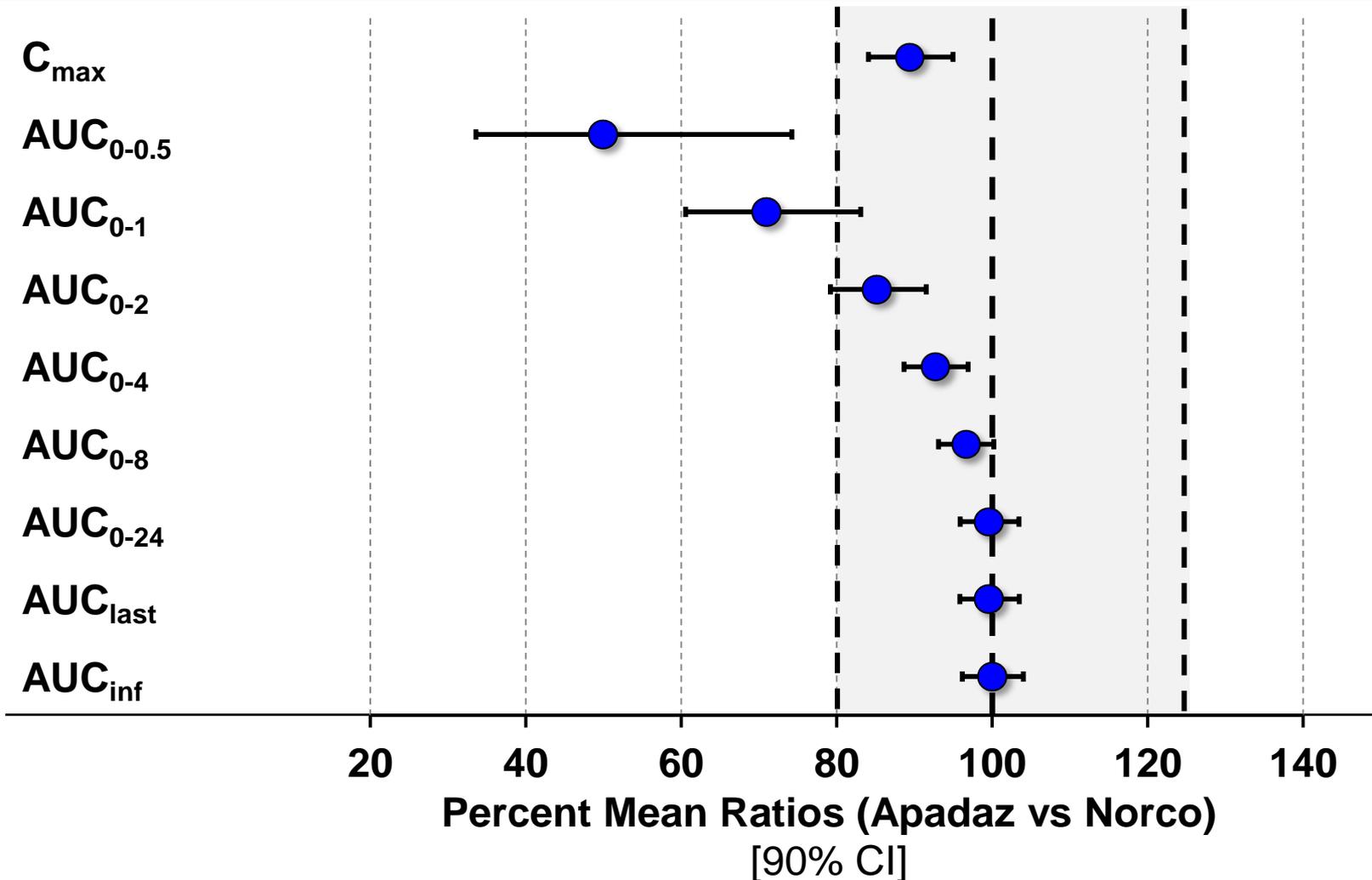


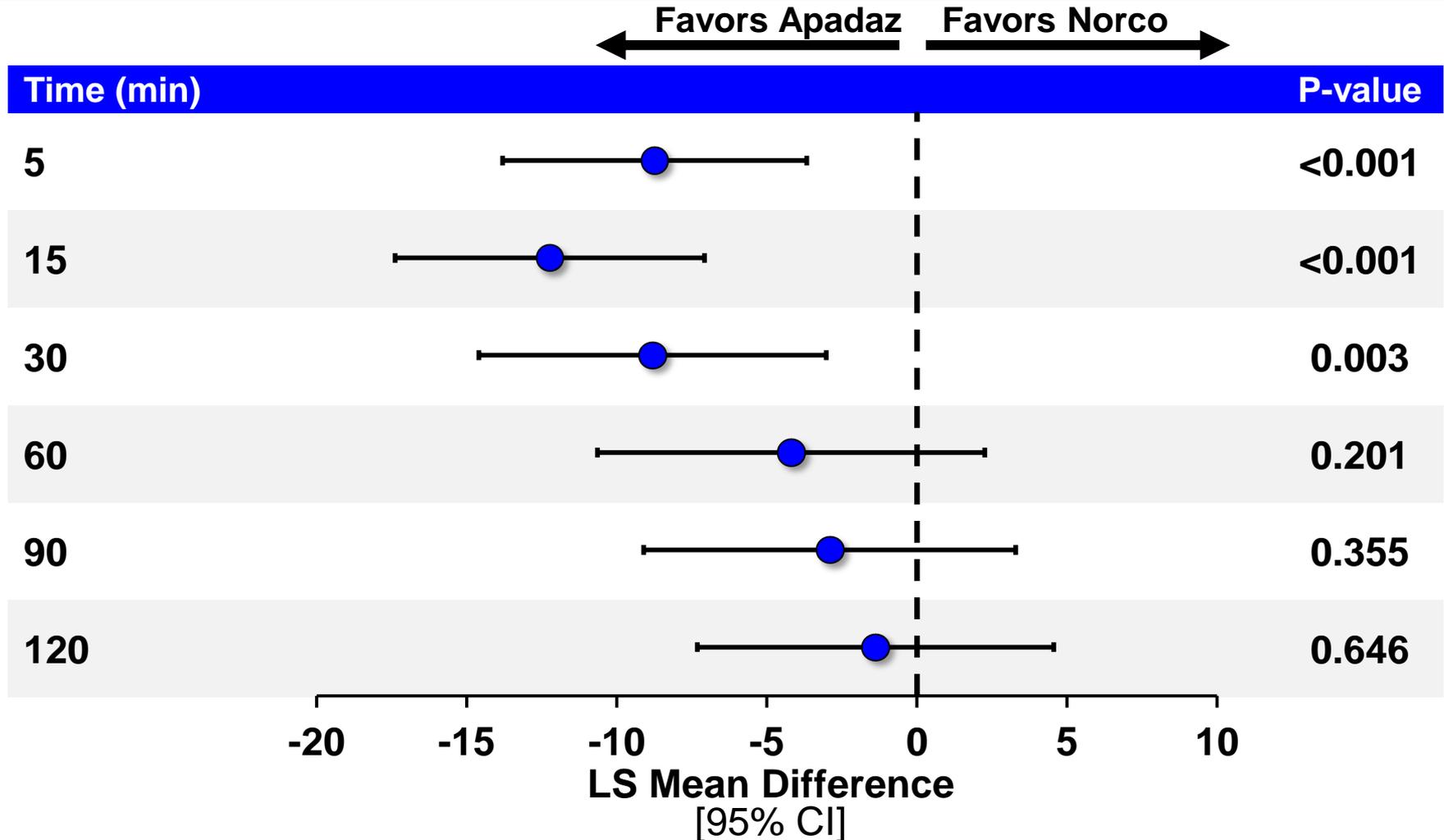
Figure 25: Mean Drug Liking in First Two Hours of Study A02



Lower Early HC Exposure with Apadaz with Intranasal Administration



Significantly Lower Drug Liking for Intranasal Administration of Apadaz vs. Norco at Early Time Points



Enzyme Hydrolysis Study of Benzhydrocodone

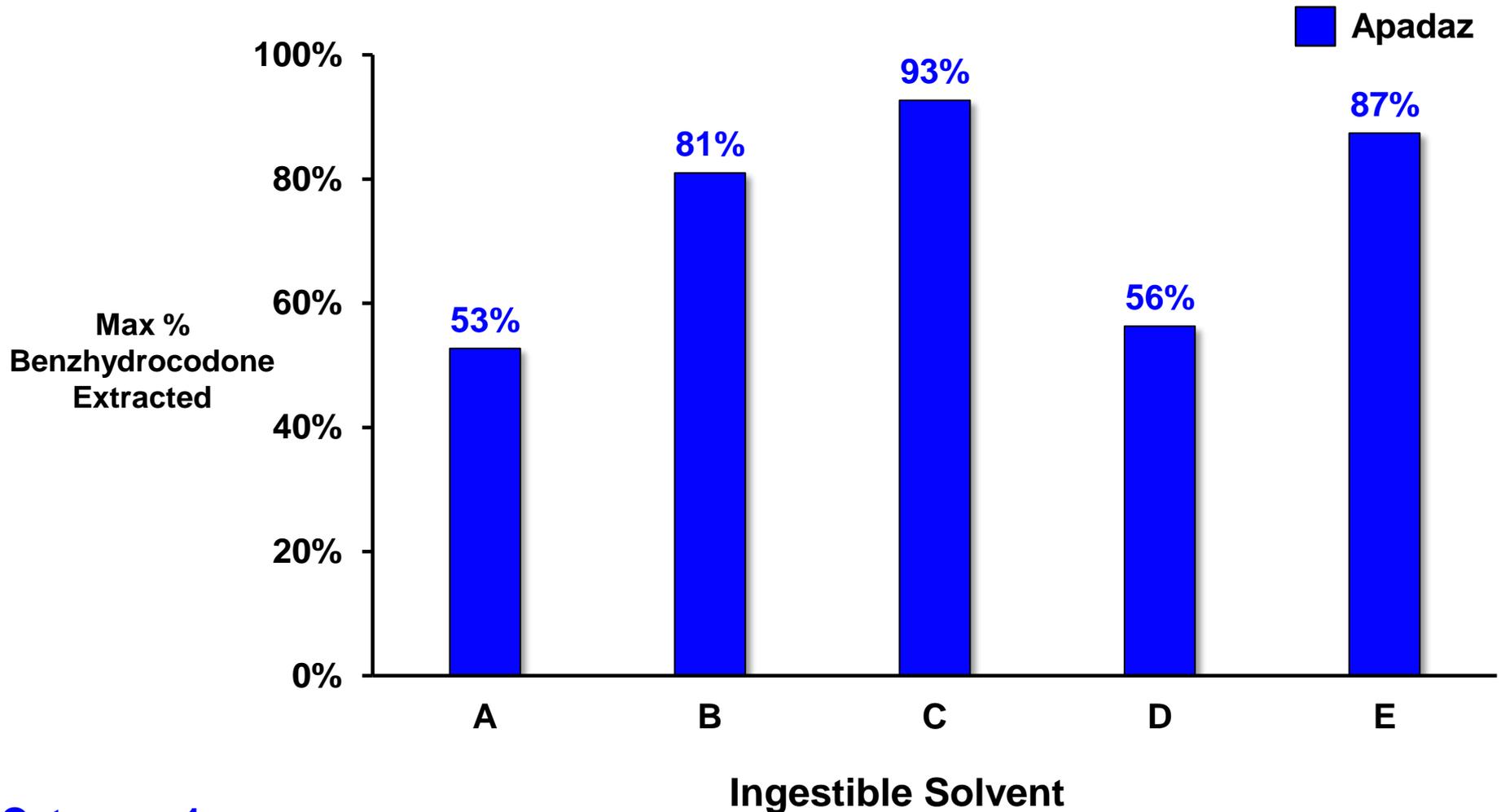
Enzyme	%-Release of Hydrocodone After 2 Hours
α -Chymotrypsin	0%
Amylase	0%
Bromelain	0%
Esterases	100%
Papain	0%
Pepsin	0%
Protease	0%
Trypsin	0%
Commercial Digestive Enzyme Cocktail	0%

Data Not Reviewed by FDA

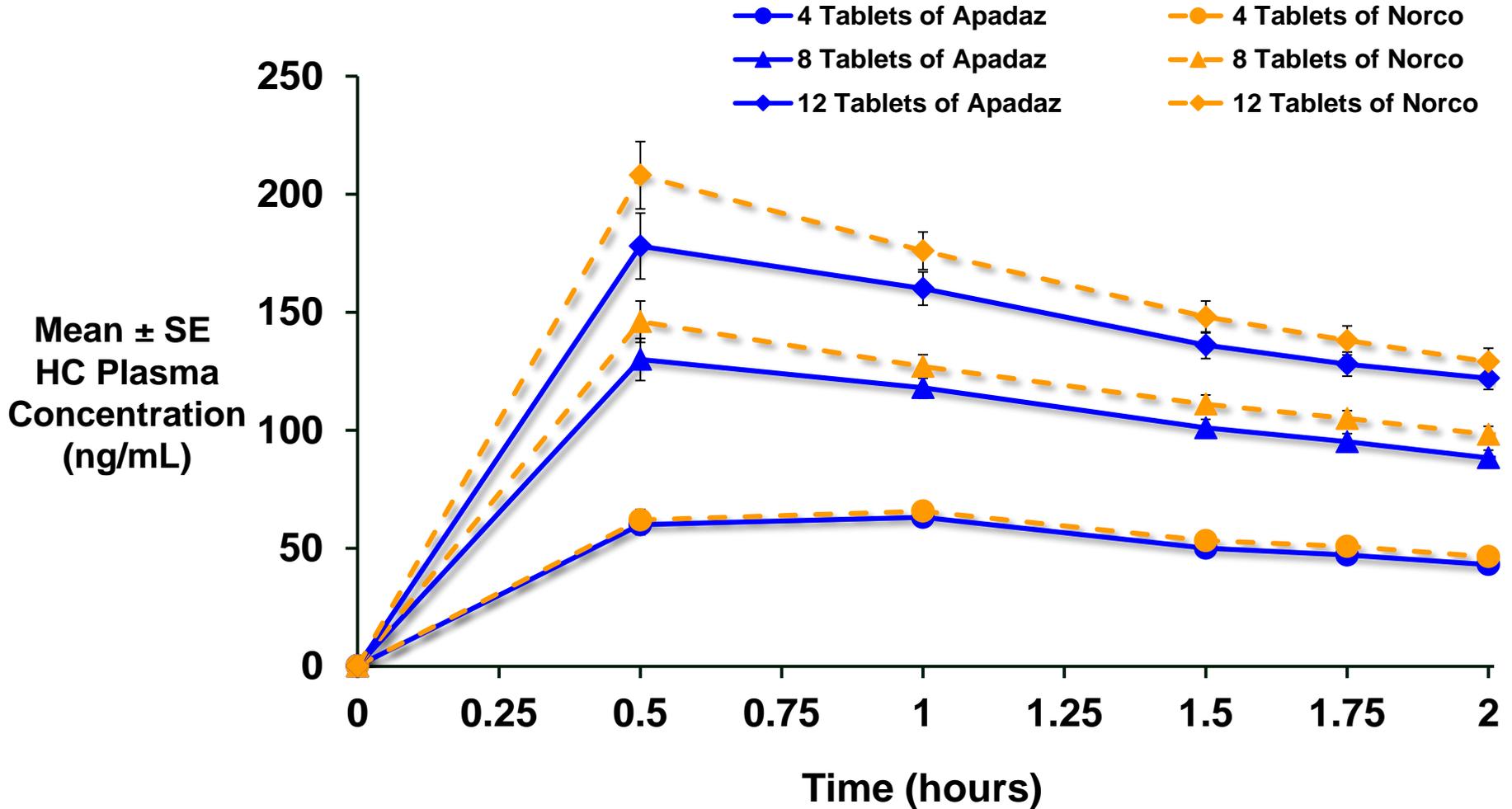
Coefficient of Variation for PK Parameters for All PK Studies with Therapeutic Doses

Study	Drug	C _{max}	AUC _{last}
101	KP201 (1x5 mg)	29.97	24.6
101	KP201 (2x5 mg)	26.04	25.6
101	Norco (10 mg)	31.55	26.43
102	Apadaz	24.63	25.67
102	Norco	25.24	26.36
103	Apadaz (Day 1)	24.77	24.8
103	Apadaz (Day 4)	23.49	27.42
104	Apadaz (fasted)	25.24	28.98
104	Apadaz (fed)	22.49	21.38
104	Norco (fed)	36.49	22.38
105	Apadaz	21.02	25.79
105	Vicoprofen	18.11	20.02
106	Apadaz	28.33	24.61

Extraction of Hydrocodone from Apadaz Was Ineffective with Ingestible Solvents



Hydrocodone Exposures at Supratherapeutic Doses Similar Between Products



Benzoic Acid Is Safe for Injection

- Ammonul[®] (sodium phenylacetate and sodium benzoate [BzONa]) for acute hyperammonemia in adult and pediatric patients (250 mg/kg of BzONa in loading phase)
- Used as preservative in some drug injections (e.g., Diazepam Injection, USP)

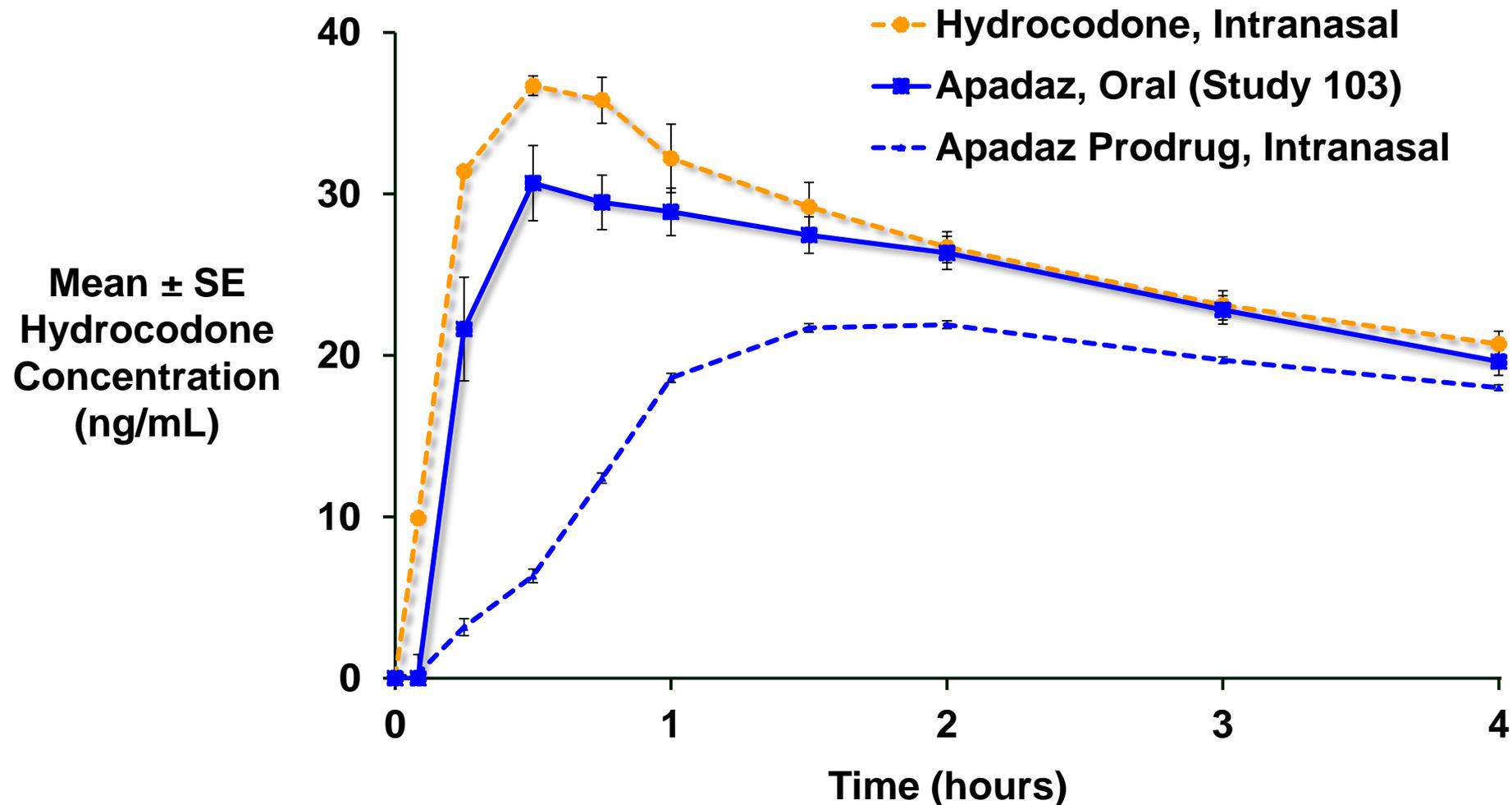
Benzoic Acid in Benzhydrocodone

- 27.7% of benzhydrocodone mass is benzoic acid
- 1.85 mg of benzoic acid per tablet
- Naturally occurs in berries and some fruits
- 1 cup of cranberries contains about 50 mg benzoic acid¹
- Used as preservative in fruit juice, soda, salad dressing, etc.
- 75–100% of oral doses up to 160 mg/kg excreted as hippuric acid within 6 hours⁽²⁾
- Estimated intake of benzoic acid in U.S.²
 - Average consumer: 161 mg/day/day
 - High consumers: 511 mg

1. Clague JA, Fellers CR. Relation of Benzoic Acid Content and Other Constituents of Cranberries to Keeping Quality. *Plant Physiol.* 1934;9(3):631-636.

2. Concise International Chemical Assessment Document (CICADS 26, 2000): Benzoic Acid and Sodium Benzoate

Intranasal Administration of Apadaz Prodrug Leads to Lower HC Release



Clarification of Sponsor Solvent X and FDA Solvent G

Sponsor Solvent X

- Advanced buffer
- 4 hours under stress conditions to extract 60% hydrocodone
- Stress +/- 4 hours reduced percent extracted
- Turned black in color
- FDA banned as food additive

FDA Solvent G

- Advanced laboratory equipment required to maintain stress temperature
- 3 hours under stress condition #2 required for effective hydrolysis