

Attachment A

(This attachment is to be completed for those applications with multiple indications only.)

Indication #2: _____

Q1: Does this indication have orphan designation?

- Yes. PREA does not apply. **Skip to signature block.**
- No. Please proceed to the next question.

Q2: Is there a full waiver for all pediatric age groups for this indication (check one)?

- Yes: (Complete Section A.)
- No: Please check all that apply:
- Partial Waiver for selected pediatric subpopulations (Complete Sections B)
 - Deferred for some or all pediatric subpopulations (Complete Sections C)
 - Completed for some or all pediatric subpopulations (Complete Sections D)
 - Appropriately Labeled for some or all pediatric subpopulations (Complete Sections E)
 - Extrapolation in One or More Pediatric Age Groups (Complete Section F)
- (Please note that Section F may be used alone or in addition to Sections C, D, and/or E.)

Section A: Fully Waived Studies (for all pediatric age groups)

Reason(s) for full waiver: (check, and attach a brief justification for the reason(s) selected)

- Necessary studies would be impossible or highly impracticable because:
- Disease/condition does not exist in children
 - Too few children with disease/condition to study
 - Other (e.g., patients geographically dispersed): _____
- Product does not represent a meaningful therapeutic benefit over existing therapies for pediatric patients AND is not likely to be used in a substantial number of pediatric patients.
- Evidence strongly suggests that product would be unsafe in all pediatric subpopulations (Note: if studies are fully waived on this ground, this information must be included in the labeling.)
- Evidence strongly suggests that product would be ineffective in all pediatric subpopulations (Note: if studies are fully waived on this ground, this information must be included in the labeling.)
- Evidence strongly suggests that product would be ineffective and unsafe in all pediatric subpopulations (Note: if studies are fully waived on this ground, this information must be included in the labeling.)
- Justification attached.

If studies are fully waived, then pediatric information is complete for this indication. If there is another indication, please complete another Pediatric Page for each indication. Otherwise, this Pediatric Page is complete and should be signed.

Section B: Partially Waived Studies (for selected pediatric subpopulations)

Check subpopulation(s) and reason for which studies are being partially waived (fill in applicable criteria below):
 Note: If Neonate includes premature infants, list minimum and maximum age in "gestational age" (in weeks).

		Reason (see below for further detail):					
		minimum	maximum	Not feasible [#]	Not meaningful therapeutic benefit [*]	Ineffective or unsafe [†]	Formulation failed ^Δ
<input type="checkbox"/>	Neonate	__ wk. __ mo.	__ wk. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are the indicated age ranges (above) based on weight (kg)? No; Yes.

Are the indicated age ranges (above) based on Tanner Stage? No; Yes.

Reason(s) for partial waiver (check reason corresponding to the category checked above, and attach a brief justification):

Not feasible:

Necessary studies would be impossible or highly impracticable because:

- Disease/condition does not exist in children
- Too few children with disease/condition to study
- Other (e.g., patients geographically dispersed): _____

* Not meaningful therapeutic benefit:

Product does not represent a meaningful therapeutic benefit over existing therapies for pediatric patients in this/these pediatric subpopulation(s) AND is not likely to be used in a substantial number of pediatric patients in this/these pediatric subpopulation(s).

† Ineffective or unsafe:

- Evidence strongly suggests that product would be unsafe in all pediatric subpopulations (Note: if studies are partially waived on this ground, this information must be included in the labeling.)
- Evidence strongly suggests that product would be ineffective in all pediatric subpopulations (Note: if studies are partially waived on this ground, this information must be included in the labeling.)
- Evidence strongly suggests that product would be ineffective and unsafe in all pediatric subpopulations (Note: if studies are partially waived on this ground, this information must be included in the labeling.)

Δ Formulation failed:

Applicant can demonstrate that reasonable attempts to produce a pediatric formulation necessary for this/these pediatric subpopulation(s) have failed. (Note: A partial waiver on this ground may only cover the pediatric subpopulation(s) requiring that formulation. An applicant seeking a partial waiver on this ground must submit documentation detailing why a pediatric formulation cannot be developed. This submission will be posted on FDA's website if waiver is granted.)

Justification attached.

For those pediatric subpopulations for which studies have not been waived, there must be (1) corresponding study plans that have been deferred (if so, proceed to Section C and complete the PeRC Pediatric Plan Template); (2) submitted studies that have been completed (if so, proceed to Section D and complete the PeRC Pediatric Assessment form); (3) additional studies in other age groups that are not needed because the drug is appropriately labeled in one or more pediatric subpopulations (if so, proceed to Section E); and/or (4) additional studies in other age groups that are not needed because efficacy is being extrapolated (if so,

IF THERE ARE QUESTIONS, PLEASE CONTACT THE CDER PMHS VIA EMAIL (cderpmhs@fda.hhs.gov) OR AT 301-796-0700.

proceed to Section F).. Note that more than one of these options may apply for this indication to cover all of the pediatric subpopulations.

Section C: Deferred Studies (for some or all pediatric subpopulations).

Check pediatric subpopulation(s) for which pediatric studies are being deferred (and fill in applicable reason below):

Deferrals (for each or all age groups):				Reason for Deferral			Applicant Certification †
Population	minimum	maximum	Ready for Approval in Adults	Need Additional Adult Safety or Efficacy Data	Other Appropriate Reason (specify below)*	Received	
<input type="checkbox"/> Neonate	__ wk. __ mo.	__ wk. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> All Pediatric Populations	0 yr. 0 mo.	16 yr. 11 mo.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Date studies are due (mm/dd/yy): _____							

Are the indicated age ranges (above) based on weight (kg)? No; Yes.

Are the indicated age ranges (above) based on Tanner Stage? No; Yes.

* Other Reason: _____

† Note: Studies may only be deferred if an applicant submits a certification of grounds for deferring the studies, a description of the planned or ongoing studies, evidence that the studies are being conducted or will be conducted with due diligence and at the earliest possible time, and a timeline for the completion of the studies. If studies are deferred, on an annual basis applicant must submit information detailing the progress made in conducting the studies or, if no progress has been made, evidence and documentation that such studies will be conducted with due diligence and at the earliest possible time. This requirement should be communicated to the applicant in an appropriate manner (e.g., in an approval letter that specifies a required study as a post-marketing commitment.)

If all of the pediatric subpopulations have been covered through partial waivers and deferrals, Pediatric Page is complete and should be signed. If not, complete the rest of the Pediatric Page as applicable.

Section D: Completed Studies (for some or all pediatric subpopulations).

Pediatric subpopulation(s) in which studies have been completed (check below):					
Population		minimum	maximum	PeRC Pediatric Assessment form attached?	
<input type="checkbox"/>	Neonate	__ wk. __ mo.	__ wk. __ mo.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<input type="checkbox"/>	All Pediatric Subpopulations	0 yr. 0 mo.	16 yr. 11 mo.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Are the indicated age ranges (above) based on weight (kg)? No; Yes.

Are the indicated age ranges (above) based on Tanner Stage? No; Yes.

Note: If there are no further pediatric subpopulations to cover based on partial waivers, deferrals and/or completed studies, Pediatric Page is complete and should be signed. If not, complete the rest of the Pediatric Page as applicable.

Section E: Drug Appropriately Labeled (for some or all pediatric subpopulations):

Additional pediatric studies are not necessary in the following pediatric subpopulation(s) because product is appropriately labeled for the indication being reviewed:			
Population		minimum	maximum
<input type="checkbox"/>	Neonate	__ wk. __ mo.	__ wk. __ mo.
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.
<input type="checkbox"/>	Other	__ yr. __ mo.	__ yr. __ mo.
<input type="checkbox"/>	All Pediatric Subpopulations	0 yr. 0 mo.	16 yr. 11 mo.

Are the indicated age ranges (above) based on weight (kg)? No; Yes.

Are the indicated age ranges (above) based on Tanner Stage? No; Yes.

If all pediatric subpopulations have been covered based on partial waivers, deferrals, completed studies, and/or existing appropriate labeling, this Pediatric Page is complete and should be signed. If not, complete the rest of the Pediatric Page as applicable.

Section F: Extrapolation from Other Adult and/or Pediatric Studies (for deferred and/or completed studies)

Note: Pediatric efficacy can be extrapolated from adequate and well-controlled studies in adults and/or other pediatric subpopulations if (and only if) (1) the course of the disease/condition AND (2) the effects of the product are sufficiently similar between the reference population and the pediatric subpopulation for which information will be extrapolated. Extrapolation of efficacy from studies in adults and/or other children usually requires supplementation with other information obtained from the target pediatric subpopulation, such as pharmacokinetic and safety studies. Under the statute, safety cannot be extrapolated.

Pediatric studies are not necessary in the following pediatric subpopulation(s) because efficacy can be extrapolated from adequate and well-controlled studies in adults and/or other pediatric subpopulations:

Population	minimum	maximum	Extrapolated from:	
			Adult Studies?	Other Pediatric Studies?
<input type="checkbox"/> Neonate	__ wk. __ mo.	__ wk. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> Other	__ yr. __ mo.	__ yr. __ mo.	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> All Pediatric Subpopulations	0 yr. 0 mo.	16 yr. 11 mo.	<input type="checkbox"/>	<input type="checkbox"/>

Are the indicated age ranges (above) based on weight (kg)? No; Yes.

Are the indicated age ranges (above) based on Tanner Stage? No; Yes.

Note: If extrapolating data from either adult or pediatric studies, a description of the scientific data supporting the extrapolation must be included in any pertinent reviews for the application.

If there are additional indications, please copy the fields above and complete pediatric information as directed. If there are no other indications, this Pediatric Page is complete and should be entered into DFS or DARRTS as appropriate after clearance by PeRC.

This page was completed by:

{See appended electronic signature page}

Regulatory Project Manager

FOR QUESTIONS ON COMPLETING THIS FORM CONTACT THE PEDIATRIC AND MATERNAL HEALTH STAFF at 301-796-0700

(Revised: 6/2008)

**This is a representation of an electronic record that was signed electronically and
this page is the manifestation of the electronic signature.**

/s/

Margaret Pease-Fye
9/12/2008 10:35:44 AM

Form Approved: OMB No. 0910 - 0297 Expiration Date: January 31, 2010 See instructions for OMB Statement, below.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

PRESCRIPTION DRUG USER FEE COVERSHEET

The completed form must be signed and accompany each new drug or biologic product application and each new supplement. See exceptions on the reverse side. If payment is sent by U.S. mail or courier, please include a copy of this completed form with payment. Payment instructions and fee rates can be found on CDER's website: <http://www.fda.gov/cder/pdufa/default.htm>

<p>1. APPLICANT'S NAME AND ADDRESS</p> <p>ELI LILLY AND CO Peggy Basham LILLY CORPORATE CENTER DROP CODE 2546 INDIANAPOLIS IN 46285 US</p>	<p>4. BLA SUBMISSION TRACKING NUMBER (STN) / NDA NUMBER</p> <p>22-307</p>
<p>2. TELEPHONE NUMBER</p> <p>317-2765185</p>	<p>5. DOES THIS APPLICATION REQUIRE CLINICAL DATA FOR APPROVAL?</p> <p><input checked="" type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>IF YOUR RESPONSE IS "NO" AND THIS IS FOR A SUPPLEMENT, STOP HERE AND SIGN THIS FORM. IF RESPONSE IS "YES", CHECK THE APPROPRIATE RESPONSE BELOW:</p> <p><input checked="" type="checkbox"/> THE REQUIRED CLINICAL DATA ARE CONTAINED IN THE APPLICATION</p> <p><input type="checkbox"/> THE REQUIRED CLINICAL DATA ARE SUBMITTED BY REFERENCE TO:</p>

<p>3. PRODUCT NAME</p> <p>Prasugrel HCl (Effient)</p>	<p>6. USER FEE I.D. NUMBER</p> <p>PD3007953</p>
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7. IS THIS APPLICATION COVERED BY ANY OF THE FOLLOWING USER FEE EXCLUSIONS? IF SO, CHECK THE APPLICABLE EXCLUSION.

<p><input type="checkbox"/> A LARGE VOLUME PARENTERAL DRUG PRODUCT APPROVED UNDER SECTION 505 OF THE FEDERAL FOOD, DRUG, AND COSMETIC ACT BEFORE 9/1/92 (Self Explanatory)</p>	<p><input type="checkbox"/> A 505(b)(2) APPLICATION THAT DOES NOT REQUIRE A FEE</p>
<p><input type="checkbox"/> THE APPLICATION QUALIFIES FOR THE ORPHAN EXCEPTION UNDER SECTION 736(a)(1)(E) of the Federal Food, Drug, and Cosmetic Act</p>	<p><input type="checkbox"/> THE APPLICATION IS SUBMITTED BY A STATE OR FEDERAL GOVERNMENT ENTITY FOR A DRUG THAT IS NOT DISTRIBUTED COMMERCIALY</p>

8. HAS A WAIVER OF AN APPLICATION FEE BEEN GRANTED FOR THIS APPLICATION? YES NO

OMB Statement:
Public reporting burden for this collection of information is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:

<p>Department of Health and Human Services Food and Drug Administration CBER, HFM-99 1401 Rockville Pike Rockville, MD 20852-1448</p>	<p>Food and Drug Administration CDER, HFD-94 12420 Parklawn Drive, Room 3046 Rockville, MD 20852</p>	<p>An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.</p>
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<p>SIGNATURE OF AUTHORIZED COMPANY REPRESENTATIVE</p> <p><i>Cheryl Beal Anderson</i> Cheryl Beal Anderson, PharmD</p>	<p>TITLE</p> <p>Director, USRA</p>	<p>DATE</p> <p>12/13/2007</p>
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9. USER FEE PAYMENT AMOUNT FOR THIS APPLICATION
\$1,178,000.00

Form FDA 3397 (03/07)

Close Print Cover sheet

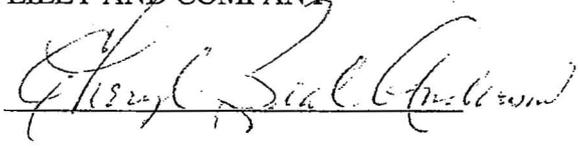
DEBARMENT CERTIFICATION

NDA Application No. 22-307

Drug Name: EFFIENT™ (prasugrel hydrochloride)

Pursuant to the provisions of 21 USC 335a(k)(1), Eli Lilly and Company, through Elizabeth C Bearby, PharmD, hereby certifies that it did not and will not use in any capacity the services of any person debarred under Section (a) or (b) [21 USC 335a (a) or (b)] of the Generic Drug Enforcement Act of 1992, in connection with the above referenced application.

ELI LILLY AND COMPANY

By: 

Cheryl Beal Anderson, PharmD, RAC
Director, US Regulatory Affairs

Date: December 18, 2007

Note to Reviewer

Studies Covered for Financial Disclosure:

“21 CFR Part 54-Financial Disclosure by Clinical Investigators” requires the reporting of financial information for investigators participating in clinical studies. Studies that are “covered” by this rule are defined as those studies that Lilly and the FDA will rely on to determine efficacy and safety of the prasugrel in patients with acute coronary syndrome and meet the requirements outlined in the regulations. Therefore, Lilly will be providing financial disclosures for the following studies:

- Study H7T-MC-TAAL “A Comparison of CS-747 and Clopidogrel in Acute Coronary Syndrome Subjects who are to Undergo Percutaneous Coronary Intervention/TIMI-38” (Phase 3)
- Study H7T-MC-TAAH “A Double-Blind, Randomized, Multicenter, Dose-Ranging Trial of CS-747 Compared with Clopidogrel in Subjects Undergoing Percutaneous Coronary Intervention” (Phase 2)
- Study H7T-MC-TABL “Prasugrel in Comparison to Clopidogrel for Inhibition of Platelet Activation and Aggregation/TIMI-44” (Phase 2)
- Study H7T-MC-TABR “A Pharmacokinetic and Pharmacodynamic Comparison of Prasugrel (LY640315) versus Clopidogrel in Aspirin-Treated Subjects with Stable Atherosclerosis” (Phase 1b)
- Study H7T-EW-TACS “Relative Bioavailability of Stored Compared to Newly Manufactured Tablets after a 60-mg Prasugrel Loading Dose in Healthy Subjects Taking a Proton Pump Inhibitor” (Phase 1)
- Study H7T-EW-TAAW “A Study to Determine the Relative Bioavailability of 5 and 10 mg Prasugrel Tablets (Part A) and to Investigate the Pharmacokinetics of Prasugrel when Administered as a 5, 30, and 60 mg Dose (Part B) in Healthy Subjects” (Phase 1)

Listed below are the details of the processes that were observed for collection of the financial disclosure information.

Lilly and Daiichi-Sankyo Processes for Collection of Financial Disclosure Information

Since prasugrel is being co-developed by Eli Lilly and Daiichi-Sankyo, two processes were followed for the collection of the financial information from the investigators.

All investigators were provided a letter prior to their participation in any one of the above-mentioned “covered” studies informing them of the “21 CFR Part 54- Financial Disclosure by Clinical Investigators” regulation. Attached to the letter was a financial disclosure collection form for investigators to fill out and sign indicating whether or not they had any significant financial interests (i.e. proprietary interest, equity interest or significant non-study payments) in either Eli Lilly or Daiichi Sankyo. Investigators were

required to fill out and sign the financial disclosure collection form prior to their participation in the study.

At the conclusion of the study, investigators were reminded to notify Lilly (or its business partners who may be conducting site management) of any changes to their financial interest in Eli Lilly or Daiichi Sankyo during the course of the study and up to 1-year post study completion.

In addition to the financial disclosure collection forms obtained from the investigators, Lilly's standard operating procedures mandate that an internal Lilly query be conducted to identify any significant payments for consulting, honoraria and/or speaker fees that may have been made to any participating investigators, by Lilly, during their course of study participation or up to 1-year post study completion. Daiichi-Sankyo standard operating procedures do not mandate the additional internal query of payments made to investigators, therefore, Daiichi-Sankyo financial disclosures were reliant on what the investigators disclosed on their financial disclosure collection form(s).

Note: No investigators who are employees of either Eli Lilly or Daiichi Sankyo participated in the trials at the time the trial was conducted.

Format of Financial Disclosure Information:

Form FDA-3454

There is a single completed Form 3454 for each of the "covered" trials, signed by the Lilly Medical Director for the prasugrel global brand development team. Following each Form 3454 is a listing of investigators who had no financial information to disclose or whose financial information was not collected, despite due diligence.

Form FDA-3455

Study H7T-MC-TAAL

There are three completed 3455 forms, signed by the Lilly Medical Director for the prasugrel global brand development team followed by the required financial disclosure (3455 Attachment) information for these three investigators, including a statement why the disclosure did not have any potential bias impact on the trial.

All other "covered studies"

There were no completed 3455 forms for any of the other "covered" studies since no investigators participating in those trials had any significant financial interest to disclose.