



NDA 203100/S-004

**SUPPLEMENT APPROVAL  
FULFILLMENT OF POSTMARKETING REQUIREMENTS**

Gilead Sciences, Inc.  
Attention: Leighann Timbs, RAC  
Associate Director, Regulatory Affairs  
333 Lakeside Drive  
Foster City, CA 94404

Dear Ms. Timbs:

Please refer to your Supplemental New Drug Application (sNDA) dated and received December 5, 2012, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Stribild<sup>®</sup> (elvitegravir, cobicistat, emtricitabine, tenofovir disoproxil fumarate) fixed dose combination tablets 150 mg/150 mg/200 mg/300 mg.

We acknowledge receipt of your amendments dated March 21, 2013, April 3, 2013, April 19, 2013, May 15, 2013, August 1, 2013, August 13, 2013, August 30, 2013, September 18, 2013, and October 1, 2013.

This Prior Approval sNDA application proposes to update the Prescribing Information (PI) with 96-week efficacy, resistance and safety data from:

- Phase 3 Study GS-US-236-0102 entitled, “A Phase 3, Randomized, Double-Blind Study to Evaluate the Safety and Efficacy of Elvitegravir/Emtricitabine/Tenofovir Disoproxil Fumarate/GS-9350 Versus Efavirenz/Emtricitabine/Tenofovir Disoproxil Fumarate in HIV-1 Infected, Antiretroviral Treatment-Naive Adults” and
- Phase 3 Study GS-US-236-0103 entitled, “A Phase 3, Randomized, Double-Blind Study to Evaluate the Safety and Efficacy of Elvitegravir/Emtricitabine/Tenofovir Disoproxil Fumarate/GS-9350 Versus Ritonavir-Boosted Atazanavir Plus Emtricitabine/Tenofovir Disoproxil Fumarate in HIV-1 Infected, Antiretroviral Treatment-Naive Adults”.

This supplement also includes clinical study reports for the Phase 1 Study GS-US-216-0125 entitled, “A Phase 1 Study Evaluating the Drug Interaction Potential Between Once-Daily Cobicistat-Boosted Elvitegravir and Methadone or Buprenorphine/Naloxone,” submitted in response to PMR 1919-10 and PMR 1919-11, established in the August 27, 2012, Stribild approval letter. In addition, this supplement includes non-clinical toxicology studies TX-216-

2030 and TX-216-2031, the long-term carcinogenicity data for cobicistat in mice and rats, respectively, and population pharmacokinetics data for cobicistat.

### **APPROVAL & LABELING**

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

### **WAIVER OF HIGHLIGHTS SECTION**

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

### **CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>. Content of labeling must be identical to the enclosed labeling (text for package insert, text for patient package insert) with the addition of any labeling changes in pending “Changes Being Effectuated” (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

Information on submitting SPL files using eList may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that includes labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

### **REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because none of these criteria apply to your application, you are exempt from this requirement.

### **FULFILLMENT OF POSTMARKETING REQUIREMENTS**

We have received your submission dated December 5, 2012, containing the final reports for the following postmarketing requirements listed in the August 27, 2012 approval letter.

1919-10 Conduct an in vivo drug-drug interaction trial of Stribild and buprenorphine/naloxone.

1919-11 Conduct an in vivo drug-drug interaction trial of Stribild and methadone.

We have reviewed your submission and conclude that the above requirements were fulfilled.

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Prescription Drug Promotion (OPDP)  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at <http://www.fda.gov/opacom/morechoices/fdaforms/cder.html>; instructions are provided on page 2 of the form. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

**REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Stacey Min, PharmD, Senior Regulatory Project Manager, at (301) 796-4253.

Sincerely,

*{See appended electronic signature page}*

Debra Birnkrant, M.D.  
Director  
Division of Antiviral Products  
Office of Antimicrobial Products  
Center for Drug Evaluation and Research

ENCLOSURE:  
Content of Labeling

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

/s/  
-----

DEBRA B BIRNKRANT  
10/02/2013