

NDA 209388

NDA APPROVAL

Evoke Pharma, Inc.
Attention: Marilyn Carlson, DMD, MD
Chief Medical Officer
420 Stevens Avenue
Suite 370
Solana Beach, CA 92075

Dear Dr. Carlson:

Please refer to your new drug application (NDA) dated and received June 1, 2018, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Gimoti (metoclopramide) 15 mg nasal spray.

We acknowledge receipt of your amendment dated December 19, 2019, which constituted a complete response to our April 1, 2019, action letter. This new drug application provides for the use of Gimoti for the relief of symptoms in adults with acute and recurrent diabetic gastroparesis.

APPROVAL & LABELING

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling with minor editorial revisions listed below and reflected in the enclosed labeling.

Highlights of Prescribing Information:

Added line of white space above the bolded Adverse Reactions contact statement.
Moved the vertical line to below Table of Contents.

Section 12.3 Pharmacokinetics

Table 3: revised units to (ng·h/mL)

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 FDA.gov.¹ Content of labeling must be identical to the enclosed labeling (text for the

¹ <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

Prescribing Information, Instructions for Use, and Medication Guide) 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 *SPL Standard for Content of Labeling Technical Qs and As*.²

The SPL will be accessible via publicly available labeling repositories.

CARTON AND CONTAINER LABELING

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling, as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labeling for approved NDA 209388.**” Approval of this submission by FDA is not required before the labeling is used.

MARKET PACKAGE

Please submit one market package of the drug product when it is available to the following address:

Maureen Dewey, M.P.H, RAC
Senior Regulatory Health Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
White Oak Building 22, Room: 5232
10903 New Hampshire Avenue
Silver Spring, Maryland
*Use zip code **20903** if shipping via United States Postal Service (USPS).*
*Use zip code **20993** if sending via any carrier other than USPS*

ADVISORY COMMITTEE

Your application for Gimoti was not referred to an FDA advisory committee because this drug is not the first in its class and the application did not raise significant public health questions on the role of the drug in the diagnosis, cure, mitigation, treatment, or prevention of a disease.

² We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

SENTINEL/ARIA NOTIFICATION

The Food and Drug Administration Amendments Act of 2007 (FDAAA) required FDA to establish a national electronic system to monitor the safety of FDA-regulated medical products. In fulfillment of this mandate, FDA established the Sentinel System, which enables FDA to proactively monitor drug safety using electronic health data from multiple data sources that contribute to the Sentinel Distributed Database.

FDA plans to evaluate Gimoti (metoclopramide) nasal spray in the Sentinel System as required for the implementation of section 505(o) of the FDCA. We have determined that Sentinel's Active Postmarket Risk Identification and Analysis System, established under section 505(k)(3) of the FDCA, is sufficient to identify an unexpected serious risk of tardive dyskinesia and related central nervous system reactions related to the novel intranasal route of administration of Gimoti (metoclopramide) nasal spray.

The ARIA safety assessment will be posted to the Sentinel website.³ Once there is sufficient product uptake to support an analysis, an analysis plan will be posted online. After the analysis is complete, FDA will also post the results on the Sentinel website. FDA will notify you prior to posting the analysis plan.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), 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 in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for this application because necessary studies are impossible or highly impracticable. The proposed indication is limited to relief of symptoms associated with acute and recurrent diabetic gastroparesis, a complication associated with longstanding Type 1 and Type 2 diabetes mellitus that rarely affects children with diabetes prior to reaching adulthood (age 18 years). Diabetic gastroparesis is among the adult-related conditions that qualify for a waiver because they rarely or never occur in pediatric patients.

POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B

We remind you of your postmarketing commitments:

- 3859-1 Conduct a single dose pharmacokinetics trial of Gimoti (metoclopramide) nasal spray in healthy subjects to characterize dose proportionality of the

³ <https://www.sentinelinitiative.org>

lower strength (e.g., 7.5 mg) and the 15 mg dose strengths. Develop a lower dosage strength (e.g., 7.5-mg) to accommodate various situations requiring further dosage adjustments.

The timetable you submitted on June 10, 2020, states that you will conduct this trial according to the following schedule:

Draft Protocol Submission: 03/2021

Final Protocol Submission: 09/2021

Trial Completion: 03/2022

Final Report Submission: 09/2022

A final submitted protocol is one that the FDA has reviewed and commented upon, and you have revised as needed to meet the goal of the clinical trial.

Submit clinical protocols to your IND 025512 for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii) you should include a status summary of each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled “**Postmarketing Commitment Protocol**,” “**Postmarketing Commitment Final Report**,” or “**Postmarketing Commitment Correspondence**.”

RISK EVALUATION AND MITIGATION STRATEGY (REMS) REQUIREMENTS

We acknowledge receipt of your submission dated June 1, 2018, of a proposed risk evaluation and mitigation strategy (REMS). We have determined that, at this time, a REMS is not necessary for Gimoti (metoclopramide) nasal spray to ensure that its benefits outweigh its risks. We will notify you if we become aware of new safety information and make a determination that a REMS is necessary.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs*.⁴

⁴ For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the Prescribing Information, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at FDA.gov.⁵ Information and Instructions for completing the form can be found at FDA.gov.⁶

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 Maureen Dewey, Senior Regulatory Project Manager, at (301) 796-0845.

Sincerely,

{See appended electronic signature page}

Joyce Korvick, M.D., M.P.H.
Deputy Director for Safety
Division of Gastroenterology
Office of Immunology and Inflammation
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
 - Prescribing Information
 - Medication Guide
 - Instructions for Use
- Carton and Container Labeling

⁵ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

⁶ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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/

JOYCE A KORVICK
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