

1 FELBATOL® (felbamate)
2 Tablets 400 mg and 600 mg, Oral Suspension 600 mg/5 mL
3

4 **Before Prescribing Felbatol® (felbamate), the physician should be thoroughly familiar with the**
5 **details of this prescribing information.**
6

7 **FELBATOL® SHOULD NOT BE USED BY PATIENTS UNTIL THERE HAS BEEN A**
8 **COMPLETE DISCUSSION OF THE RISKS AND THE PATIENT, PARENT, OR GUARDIAN**
9 **HAS BEEN PROVIDED THE FELBATOL WRITTEN INFORMED CONSENT (SEE PATIENT**
10 **INFORMATION/CONSENT SECTION).**
11

12 **WARNING**

13 **1. APLASTIC ANEMIA**

14 THE USE OF FELBATOL® (felbamate) IS ASSOCIATED WITH A MARKED INCREASE IN THE
15 INCIDENCE OF APLASTIC ANEMIA. ACCORDINGLY, FELBATOL® SHOULD ONLY BE USED
16 IN PATIENTS WHOSE EPILEPSY IS SO SEVERE THAT THE RISK OF APLASTIC ANEMIA IS
17 DEEMED ACCEPTABLE IN LIGHT OF THE BENEFITS CONFERRED BY ITS USE (SEE
18 **INDICATIONS**). ORDINARILY, A PATIENT SHOULD NOT BE PLACED ON AND/OR
19 CONTINUED ON FELBATOL® WITHOUT CONSIDERATION OF APPROPRIATE EXPERT
20 HEMATOLOGIC CONSULTATION.

21
22 AMONG FELBATOL® TREATED PATIENTS, APLASTIC ANEMIA (PANCYTOPENIA IN THE
23 PRESENCE OF A BONE MARROW LARGELY DEPLETED OF HEMATOPOIETIC PRECURSORS)
24 OCCURS AT AN INCIDENCE THAT MAY BE MORE THAN A 100 FOLD GREATER THAN THAT
25 SEEN IN THE UNTREATED POPULATION (I.E., 2 TO 5 PER MILLION PERSONS PER YEAR).
26 THE RISK OF DEATH IN PATIENTS WITH APLASTIC ANEMIA GENERALLY VARIES AS A
27 FUNCTION OF ITS SEVERITY AND ETIOLOGY; CURRENT ESTIMATES OF THE OVERALL
28 CASE FATALITY RATE ARE IN THE RANGE OF 20 TO 30%, BUT RATES AS HIGH AS 70%
29 HAVE BEEN REPORTED IN THE PAST.

30
31 THERE ARE TOO FEW FELBATOL® ASSOCIATED CASES, AND TOO LITTLE KNOWN ABOUT
32 THEM TO PROVIDE A RELIABLE ESTIMATE OF THE SYNDROME'S INCIDENCE OR ITS CASE
33 FATALITY RATE OR TO IDENTIFY THE FACTORS, IF ANY, THAT MIGHT CONCEIVABLY BE
34 USED TO PREDICT WHO IS AT GREATER OR LESSER RISK.

35
36 IN MANAGING PATIENTS ON FELBATOL®, IT SHOULD BE BORNE IN MIND THAT THE
37 CLINICAL MANIFESTATION OF APLASTIC ANEMIA MAY NOT BE SEEN UNTIL AFTER A
38 PATIENT HAS BEEN ON FELBATOL® FOR SEVERAL MONTHS (E.G., ONSET OF APLASTIC
39 ANEMIA AMONG FELBATOL® EXPOSED PATIENTS FOR WHOM DATA ARE AVAILABLE
40 HAS RANGED FROM 5 TO 30 WEEKS). HOWEVER, THE INJURY TO BONE MARROW STEM
41 CELLS THAT IS HELD TO BE ULTIMATELY RESPONSIBLE FOR THE ANEMIA MAY OCCUR
42 WEEKS TO MONTHS EARLIER. ACCORDINGLY, PATIENTS WHO ARE DISCONTINUED
43 FROM FELBATOL® REMAIN AT RISK FOR DEVELOPING ANEMIA FOR A VARIABLE, AND
44 UNKNOWN, PERIOD AFTERWARDS.

45
46 IT IS NOT KNOWN WHETHER OR NOT THE RISK OF DEVELOPING APLASTIC ANEMIA
47 CHANGES WITH DURATION OF EXPOSURE. CONSEQUENTLY, IT IS NOT SAFE TO ASSUME
48 THAT A PATIENT WHO HAS BEEN ON FELBATOL® WITHOUT SIGNS OF HEMATOLOGIC
49 ABNORMALITY FOR LONG PERIODS OF TIME IS WITHOUT RISK.

50 IT IS NOT KNOWN WHETHER OR NOT THE DOSE OF FELBATOL® AFFECTS THE
51 INCIDENCE OF APLASTIC ANEMIA.

52 IT IS NOT KNOWN WHETHER OR NOT CONCOMITANT USE OF ANTIEPILEPTIC DRUGS
53 AND/OR OTHER DRUGS AFFECTS THE INCIDENCE OF APLASTIC ANEMIA.
54

55
56 APLASTIC ANEMIA TYPICALLY DEVELOPS WITHOUT PREMONITORY CLINICAL OR
57 LABORATORY SIGNS, THE FULL BLOWN SYNDROME PRESENTING WITH SIGNS OF
58 INFECTION, BLEEDING, OR ANEMIA. ACCORDINGLY, ROUTINE BLOOD TESTING CANNOT
59 BE RELIABLY USED TO REDUCE THE INCIDENCE OF APLASTIC ANEMIA, BUT, IT WILL, IN
60 SOME CASES, ALLOW THE DETECTION OF THE HEMATOLOGIC CHANGES BEFORE THE
61 SYNDROME DECLARES ITSELF CLINICALLY. FELBATOL® SHOULD BE DISCONTINUED IF
62 ANY EVIDENCE OF BONE MARROW DEPRESSION OCCURS.
63

64 **2. HEPATIC FAILURE**

65 EVALUATION OF POSTMARKETING EXPERIENCE SUGGESTS THAT ACUTE LIVER
66 FAILURE IS ASSOCIATED WITH THE USE OF FELBATOL®. THE REPORTED RATE IN THE
67 U.S. HAS BEEN ABOUT 6 CASES OF LIVER FAILURE LEADING TO DEATH OR TRANSPLANT
68 PER 75,000 PATIENT YEARS OF USE. THIS RATE IS AN UNDERESTIMATE BECAUSE OF
69 UNDER REPORTING, AND THE TRUE RATE COULD BE CONSIDERABLY GREATER THAN
70 THIS. FOR EXAMPLE, IF THE REPORTING RATE IS 10%, THE TRUE RATE WOULD BE ONE
71 CASE PER 1,250 PATIENT YEARS OF USE.
72

73 OF THE CASES REPORTED, ABOUT 67% RESULTED IN DEATH OR LIVER
74 TRANSPLANTATION, USUALLY WITHIN 5 WEEKS OF THE ONSET OF SIGNS AND
75 SYMPTOMS OF LIVER FAILURE. THE EARLIEST ONSET OF SEVERE HEPATIC
76 DYSFUNCTION FOLLOWED SUBSEQUENTLY BY LIVER FAILURE WAS 3 WEEKS AFTER
77 INITIATION OF FELBATOL®. ALTHOUGH SOME REPORTS DESCRIBED DARK URINE AND
78 NONSPECIFIC PRODROMAL SYMPTOMS (E.G., ANOREXIA, MALAISE, AND
79 GASTROINTESTINAL SYMPTOMS), IN OTHER REPORTS IT WAS NOT CLEAR IF ANY
80 PRODROMAL SYMPTOMS PRECEDED THE ONSET OF JAUNDICE.
81

82 IT IS NOT KNOWN WHETHER OR NOT THE RISK OF DEVELOPING HEPATIC FAILURE
83 CHANGES WITH DURATION OF EXPOSURE.
84

85 IT IS NOT KNOWN WHETHER OR NOT THE DOSAGE OF FELBATOL® AFFECTS THE
86 INCIDENCE OF HEPATIC FAILURE.
87

88 IT IS NOT KNOWN WHETHER CONCOMITANT USE OF OTHER ANTIEPILEPTIC DRUGS
89 AND/OR OTHER DRUGS AFFECT THE INCIDENCE OF HEPATIC FAILURE.
90

91 FELBATOL® SHOULD NOT BE PRESCRIBED FOR ANYONE WITH A HISTORY OF HEPATIC
92 DYSFUNCTION.
93

94 TREATMENT WITH FELBATOL® SHOULD BE INITIATED ONLY IN INDIVIDUALS WITHOUT
95 ACTIVE LIVER DISEASE AND WITH NORMAL BASELINE SERUM TRANSAMINASES. IT HAS
96 NOT BEEN PROVED THAT PERIODIC SERUM TRANSAMINASE TESTING WILL PREVENT
97 SERIOUS INJURY BUT IT IS GENERALLY BELIEVED THAT EARLY DETECTION OF DRUG-
98 INDUCED HEPATIC INJURY ALONG WITH IMMEDIATE WITHDRAWAL OF THE SUSPECT
99 DRUG ENHANCES THE LIKELIHOOD FOR RECOVERY. THERE IS NO INFORMATION
100 AVAILABLE THAT DOCUMENTS HOW RAPIDLY PATIENTS CAN PROGRESS FROM
101 NORMAL LIVER FUNCTION TO LIVER FAILURE, BUT OTHER DRUGS KNOWN TO BE
102 HEPATOTOXINS CAN CAUSE LIVER FAILURE RAPIDLY (E.G., FROM NORMAL ENZYMES

103 TO LIVER FAILURE IN 2-4 WEEKS). ACCORDINGLY, MONITORING OF SERUM
104 TRANSAMINASE LEVELS (AST AND ALT) IS RECOMMENDED AT BASELINE AND
105 PERIODICALLY THEREAFTER. WHILE THE MORE FREQUENT THE MONITORING THE
106 GREATER THE CHANCES OF EARLY DETECTION, THE PRECISE SCHEDULE FOR
107 MONITORING IS A MATTER OF CLINICAL JUDGEMENT.

108
109 FELBATOL® SHOULD BE DISCONTINUED IF EITHER SERUM AST OR SERUM ALT LEVELS
110 BECOME INCREASED ≥ 2 TIMES THE UPPER LIMIT OF NORMAL, OR IF CLINICAL SIGNS
111 AND SYMPTOMS SUGGEST LIVER FAILURE (SEE PRECAUTIONS). PATIENTS WHO
112 DEVELOP EVIDENCE OF HEPATOCELLULAR INJURY WHILE ON FELBATOL® AND ARE
113 WITHDRAWN FROM THE DRUG FOR ANY REASON SHOULD BE PRESUMED TO BE AT
114 INCREASED RISK FOR LIVER INJURY IF FELBATOL® IS REINTRODUCED. ACCORDINGLY,
115 SUCH PATIENTS SHOULD NOT BE CONSIDERED FOR RE-TREATMENT.

116

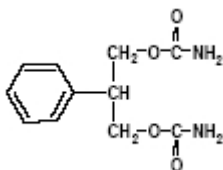
117 DESCRIPTION

118 Felbatol® (felbamate) is an antiepileptic available as 400 mg and 600 mg tablets and as a 600 mg/5 mL
119 suspension for oral administration. Its chemical name is 2-phenyl-1,3-propanediol dicarbamate.

120

121 Felbamate is a white to off-white crystalline powder with a characteristic odor. It is very slightly soluble
122 in water, slightly soluble in ethanol, sparingly soluble in methanol, and freely soluble in dimethyl
123 sulfoxide. The molecular weight is 238.24; felbamate's molecular formula is $C_{11}H_{14}N_2O_4$; its
124 structural formula is:

125



126

127

128 The inactive ingredients for Felbatol® (felbamate) tablets 400 mg and 600 mg are starch, microcrystalline
129 cellulose, croscarmellose sodium, lactose, magnesium stearate, FD&C Yellow No. 6, D&C Yellow No.
130 10, and FD&C Red No. 40 (600 mg tablets only). The inactive ingredients for Felbatol® (felbamate)
131 suspension 600 mg/5 mL are sorbitol, glycerin, microcrystalline cellulose, carboxymethylcellulose
132 sodium, simethicone, polysorbate 80, methylparaben, saccharin sodium, propylparaben, FD&C Yellow
133 No. 6, FD&C Red No. 40, flavorings, and purified water.

134

135 CLINICAL PHARMACOLOGY

136 Mechanism of Action:

137 The mechanism by which felbamate exerts its anticonvulsant activity is unknown, but in animal test
138 systems designed to detect anticonvulsant activity, felbamate has properties in common with other
139 marketed anticonvulsants. Felbamate is effective in mice and rats in the maximal electroshock test, the
140 subcutaneous pentylenetetrazol seizure test, and the subcutaneous picrotoxin seizure test. Felbamate also
141 exhibits anticonvulsant activity against seizures induced by intracerebroventricular administration of
142 glutamate in rats and N-methyl-D,L-aspartic acid in mice. Protection against maximal electroshock-
143 induced seizures suggests that felbamate may reduce seizure spread, an effect possibly predictive of
144 efficacy in generalized tonic-clonic or partial seizures. Protection against pentylenetetrazol-induced
145 seizures suggests that felbamate may increase seizure threshold, an effect considered to be predictive of
146 potential efficacy in absence seizures.

147

148 Receptor-binding studies *in vitro* indicate that felbamate has weak inhibitory effects on GABA-receptor
149 binding, benzodiazepine receptor binding, and is devoid of activity at the MK-801 receptor binding site of
150 the NMDA receptor-ionophore complex. However, felbamate does interact as an antagonist at the
151 strychnine-insensitive glycine recognition site of the NMDA receptor-ionophore complex. Felbamate is
152 not effective in protecting chick embryo retina tissue against the neurotoxic effects of the excitatory
153 amino acid agonists NMDA, kainate, or quisqualate *in vitro*.

154
155 The monocarbamate, p-hydroxy, and 2-hydroxy metabolites were inactive in the maximal electroshock-
156 induced seizure test in mice. The monocarbamate and p-hydroxy metabolites had only weak (0.2 to 0.6)
157 activity compared with felbamate in the subcutaneous pentylenetetrazol seizure test. These metabolites
158 did not contribute significantly to the anticonvulsant action of felbamate.

159 **Pharmacokinetics:**

160 The numbers in the pharmacokinetic section are mean \pm standard deviation.

161
162
163 Felbamate is well-absorbed after oral administration. Over 90% of the radioactivity after a dose of 1000
164 mg ¹⁴C felbamate was found in the urine. Absolute bioavailability (oral vs. parenteral) has not been
165 measured. The tablet and suspension were each shown to be bioequivalent to the capsule used in clinical
166 trials, and pharmacokinetic parameters of the tablet and suspension are similar. There was no effect of
167 food on absorption of the tablet; the effect of food on absorption of the suspension has not been evaluated.

168
169 Following oral administration, felbamate is the predominant plasma species (about 90% of plasma
170 radioactivity). About 40-50% of absorbed dose appears unchanged in urine, and an additional 40% is
171 present as unidentified metabolites and conjugates. About 15% is present as parahydroxyfelbamate, 2-
172 hydroxyfelbamate, and felbamate monocarbamate, none of which have significant anticonvulsant activity.

173
174 Binding of felbamate to human plasma protein was independent of felbamate concentrations between 10
175 and 310 micrograms/mL. Binding ranged from 22% to 25%, mostly to albumin, and was dependent on
176 the albumin concentration.

177
178 Felbamate is excreted with a terminal half-life of 20-23 hours, which is unaltered after multiple doses.
179 Clearance after a single 1200 mg dose is 26 ± 3 mL/hr/kg, and after multiple daily doses of 3600 mg is
180 30 ± 8 mL/hr/kg. The apparent volume of distribution was 756 ± 82 mL/kg after a 1200 mg dose. Felbamate
181 C_{max} and AUC are proportionate to dose after single and multiple doses over a range of 100-800 mg
182 single doses and 1200-3600 mg daily doses. C_{min} (trough) blood levels are also dose proportional.
183 Multiple daily doses of 1200, 2400, and 3600 mg gave C_{min} values of 30 ± 5 , 55 ± 8 , and 83 ± 21
184 micrograms/mL (N=10 patients). Linear and dose proportional pharmacokinetics were also observed at
185 doses above 3600 mg/day up to the maximum dose studied of 6000 mg/day. Felbamate gave dose
186 proportional steady-state peak plasma concentrations in children age 4-12 over a range of 15, 30, and 45
187 mg/kg/day with peak concentrations of 17, 32, and 49 micrograms/mL.

188
189 The effects of race and gender on felbamate pharmacokinetics have not been systematically evaluated, but
190 plasma concentrations in males (N=5) and females (N=4) given felbamate have been similar. The effects
191 of felbamate kinetics on hepatic functional impairment have not been evaluated.

192
193 **Renal Impairment:** Felbamate's single dose monotherapy pharmacokinetic parameters were evaluated in
194 12 otherwise healthy individuals with renal impairment. There was a 40-50% reduction in total body
195 clearance and 9-15 hours prolongation of half-life in renally impaired subjects compared to that in
196 subjects with normal renal function. Reduced felbamate clearance and a longer half-life were associated
197 with diminishing renal function.

198

199 **Pharmacodynamics:**

200 Typical Physiologic responses:

201 1. *Cardiovascular* In adults, there is no effect of felbamate on blood pressure. Small but statistically
202 significant mean increases in heart rate were seen during adjunctive therapy and monotherapy; however,
203 these mean increases of up to 5 bpm were not clinically significant. In children, no clinically relevant
204 changes in blood pressure or heart rate were seen during adjunctive therapy or monotherapy with
205 felbamate.

206

207 2. *Other Physiologic Effects:* The only other change in vital signs was a mean decrease of approximately
208 1 respiration per minute in respiratory rate during adjunctive therapy in children. In adults, statistically
209 significant mean reductions in body weight were observed during felbamate monotherapy and adjunctive
210 therapy. In children, there were mean decreases in body weight during adjunctive therapy and
211 monotherapy; however, these mean changes were not statistically significant. These mean reductions in
212 adults and children were approximately 5% of the mean weights at baseline.

213

214 **CLINICAL STUDIES**

215 The results of controlled clinical trials established the efficacy of Felbatol® (felbamate) as monotherapy
216 and adjunctive therapy in adults with partial-onset seizures with or without secondary generalization and
217 in partial and generalized seizures associated with Lennox-Gastaut syndrome in children.

218

219 **Felbatol® Monotherapy Trials in Adults**

220 Felbatol® (3600 mg/day given QID) and low-dose valproate (15 mg/kg/day) were compared as
221 monotherapy during a 112-day treatment period in a multicenter and a single-center double-blind efficacy
222 trial. Both trials were conducted according to an identical study design. During a 56-day baseline period,
223 all patients had at least four partial-onset seizures per 28 days and were receiving one antiepileptic drug at
224 a therapeutic level, the most common being carbamazepine. In the multicenter trial, baseline seizure
225 frequencies were 12.4 per 28 days in the Felbatol® group and 21.3 per 28 days in the low-dose valproate
226 group. In the single-center trial, baseline seizure frequencies were 18.1 per 28 days in the Felbatol®
227 group and 15.9 per 28 days in the low-dose valproate group. Patients were converted to monotherapy with
228 Felbatol® or low-dose valproic acid during the first 28 days of the 112-day treatment period. Study
229 endpoints were completion of 112 study days or fulfilling an escape criterion. Criteria for escape relative
230 to baseline were: (1) twofold increase in monthly seizure frequency, (2) twofold increase in highest 2-day
231 seizure frequency, (3) single generalized tonic-clonic seizure (GTC) if none occurred during baseline, or
232 (4) significant prolongation of GTCs. The primary efficacy variable was the number of patients in each
233 treatment group who met escape criteria.

234

235 In the multicenter trial, the percentage of patients who met escape criteria was 40% (18/45) in the
236 Felbatol® group and 78% (39/50) in the low-dose valproate group. In the single-center trial, the
237 percentage of patients who met escape criteria was 14% (3/21) in the Felbatol® group and 90% (19/21) in
238 the low-dose valproate group. In both trials, the difference in the percentage of patients meeting escape
239 criteria was statistically significant ($P < .001$) in favor of Felbatol®. These two studies by design were
240 intended to demonstrate the effectiveness of Felbatol® monotherapy. The studies were not designed or
241 intended to demonstrate comparative efficacy of the two drugs. For example, valproate was not used at
242 the maximally effective dose.

243

244 **Felbatol® Adjunctive Therapy Trials in Adults**

245 A double-blind, placebo-controlled crossover trial consisted of two 10-week outpatient treatment periods.
246 Patients with refractory partial-onset seizures who were receiving phenytoin and carbamazepine at
247 therapeutic levels were administered Felbatol® (felbamate) as add-on therapy at a starting dosage of 1400
248 mg/day in three divided doses, which was increased to 2600 mg/day in three divided doses. Among the 56

249 patients who completed the study, the baseline seizure frequency was 20 per month. Patients treated with
250 Felbatol® had fewer seizures than patients treated with placebo for each treatment sequence. There was a
251 23% (P=.018) difference in percentage seizure frequency reduction in favor of Felbatol®.

252
253 Felbatol® 3600 mg/day given QID and placebo were compared in a 28-day double-blind add-on trial in
254 patients who had their standard antiepileptic drugs reduced while undergoing evaluations for surgery of
255 intractable epilepsy. All patients had confirmed partial-onset seizures with or without generalization,
256 seizure frequency during surgical evaluation not exceeding an average of four partial seizures per day or
257 more than one generalized seizure per day, and a minimum average of one partial or generalized tonic-
258 clonic seizure per day for the last 3 days of the surgical evaluation. The primary efficacy variable was
259 time to fourth seizure after randomization to treatment with Felbatol® or placebo. Thirteen (46%) of 28
260 patients in the Felbatol® group versus 29 (88%) of 33 patients in the placebo group experienced a fourth
261 seizure. The median times to fourth seizure were greater than 28 days in the Felbatol® group and 5 days
262 in the placebo group. The difference between Felbatol® and placebo in time to fourth seizure was
263 statistically significant (P=.002) in favor of Felbatol®.

264 265 **Felbatol® Adjunctive Therapy Trial in Children with Lennox-Gastaut Syndrome**

266 In a 70-day double-blind, placebo-controlled add-on trial in the Lennox-Gastaut syndrome, Felbatol® 45
267 mg/kg/day given QID was superior to placebo in controlling the multiple seizure types associated with
268 this condition. Patients had at least 90 atonic and/or atypical absence seizures per month while receiving
269 therapeutic dosages of one or two other antiepileptic drugs. Patients had a past history of using an average
270 of eight antiepileptic drugs. The most commonly used antiepileptic drug during the baseline period was
271 valproic acid. The frequency of all types of seizures during the baseline period was 1617 per month in the
272 Felbatol® group and 716 per month in the placebo group. Statistically significant differences in the effect
273 on seizure frequency favored Felbatol® over placebo for total seizures (26% reduction vs 5% increase,
274 P<.001), atonic seizures (44% reduction vs 7% reduction, P=.002), and generalized tonic-clonic seizures
275 (40% reduction vs 12% increase, P=.017). Parent/guardian global evaluations based on impressions of
276 quality of life with respect to alertness, verbal responsiveness, general well-being, and seizure control
277 significantly (P<.001) favored Felbatol® over placebo.

278
279 When efficacy was analyzed by gender in four well-controlled trials of felbamate as adjunctive and
280 monotherapy for partial-onset seizures and Lennox-Gastaut syndrome, a similar response was seen in 122
281 males and 142 females.

282 283 **INDICATIONS AND USAGE**

284
285 Felbatol® is not indicated as a first line antiepileptic treatment (see **Warnings**). Felbatol® is
286 recommended for use only in those patients who respond inadequately to alternative treatments and
287 whose epilepsy is so severe that a substantial risk of aplastic anemia and/or liver failure is deemed
288 acceptable in light of the benefits conferred by its use.

289
290 If these criteria are met and the patient has been fully advised of the risk, and has provided written,
291 informed consent, Felbatol® can be considered for either monotherapy or adjunctive therapy in the
292 treatment of partial seizures, with and without generalization, in adults with epilepsy and as adjunctive
293 therapy in the treatment of partial and generalized seizures associated with Lennox-Gastaut syndrome in
294 children.

295 296 **CONTRAINDICATIONS**

297 Felbatol® is contraindicated in patients with known hypersensitivity to Felbatol®, its ingredients, or
298 known sensitivity to other carbamates. It should not be used in patients with a history of any blood
299 dyscrasia or hepatic dysfunction.

300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332

WARNINGS

See Boxed Warning regarding aplastic anemia and hepatic failure. Antiepileptic drugs should not be suddenly discontinued because of the possibility of increasing seizure frequency.

Suicidal Behavior and Ideation

Antiepileptic drugs (AEDs) including Felbatol®, increase the risk of suicidal thoughts or behavior in patients taking these drugs for any indication. Patients treated with any AED for any indication should be monitored for the emergence or worsening of depression, suicidal thoughts or behavior, and/or any unusual changes in mood or behavior.

Pooled analyses of 199 placebo-controlled clinical trials (mono- and adjunctive therapy) of 11 different AEDs showed that patients randomized to one of the AEDs had approximately twice the risk (adjusted Relative Risk 1.8, 95% CI:1.2, 2.7) of suicidal thinking or behavior compared to patients randomized to placebo. In these trials, which had a median treatment duration of 12 weeks, the estimated incidence rate of suicidal behavior or ideation among 27,863 AED-treated patients was 0.43%, compared to 0.24% among 16,029 placebo-treated patients, representing an increase of approximately one case of suicidal thinking or behavior for every 530 patients treated. There were four suicides in drug-treated patients in the trials and none in placebo-treated patients, but the number is too small to allow any conclusion about drug effect on suicide.

The increased risk of suicidal thoughts or behavior with AEDs was observed as early as one week after starting drug treatment with AEDs and persisted for the duration of treatment assessed. Because most trials included in the analysis did not extend beyond 24 weeks, the risk of suicidal thoughts or behavior beyond 24 weeks could not be assessed.

The risk of suicidal thoughts or behavior was generally consistent among drugs in the data analyzed. The finding of increased risk with AEDs of varying mechanisms of action and across a range of indications suggests that the risk applies to all AEDs used for any indication. The risk did not vary substantially by age (5-100 years) in the clinical trials analyzed.

Table 1 shows absolute and relative risk by indication for all evaluated AEDs.

Table 1 Risk by indication for antiepileptic drugs in the pooled analysis				
Indication	Placebo Patients with Events Per 1000 Patients	Drug Patients with Events Per 1000 Patients	Relative Risk: Incidence of Events in Drug Patients/Incidence in Placebo Patients	Risk Difference: Additional Drug Patients with Events Per 1000 Patients
Epilepsy	1.0	3.4	3.5	2.4
Psychiatric	5.7	8.5	1.5	2.9
Other	1.0	1.8	1.9	0.9
Total	2.4	4.3	1.8	1.9

333
334
335
336
337
338
339

The relative risk for suicidal thoughts or behavior was higher in clinical trials for epilepsy than in clinical trials for psychiatric or other conditions, but the absolute risk differences were similar for the epilepsy and psychiatric indications.

Anyone considering prescribing Felbatol or any other AED must balance the risk of suicidal thoughts or behavior with the risk of untreated illness. Epilepsy and many other illnesses for which AEDs are

340 prescribed are themselves associated with morbidity and mortality and an increased risk of suicidal
341 thoughts and behavior. Should suicidal thoughts and behavior emerge during treatment, the prescriber
342 needs to consider whether the emergence of these symptoms in any given patient may be related
343 to the illness being treated.

344
345 Patients, their caregivers, and families should be informed that AEDs increase the risk of suicidal
346 thoughts and behavior and should be advised of the need to be alert for the emergence or
347 worsening of the signs and symptoms of depression, any unusual changes in mood or behavior,
348 or the emergence of suicidal thoughts, behavior, or thoughts about self-harm. Behaviors of
349 concern should be reported immediately to healthcare providers.

350
351 **PRECAUTIONS**

352 **Dosage Adjustment in the Renally Impaired:** A study in otherwise healthy individuals with renal
353 dysfunction indicated that prolonged half-life and reduced clearance of felbamate are associated with
354 diminishing renal function. Felbamate should be used with caution in patients with renal dysfunction (see
355 **DOSAGE AND ADMINISTRATION**).

356
357 **Information for Patients:** Patients should be informed that the use of Felbatol® is associated with
358 aplastic anemia and hepatic failure, potentially fatal conditions acutely or over a long term.

359
360 The physician should provide obtain written, informed consent prior to initiation of Felbatol® therapy
361 (see **PATIENT INFORMATION/CONSENT** section).

362
363 Aplastic anemia in the general population is relatively rare. The absolute risk for the individual patient is
364 not known with any degree of reliability, but patients on Felbatol® may be at more than a 100 fold greater
365 risk for developing the syndrome than the general population.

366
367 The long term outlook for patients with aplastic anemia is variable. Although many patients are
368 apparently cured, others require repeated transfusions and other treatments for relapses, and some,
369 although surviving for years, ultimately develop serious complications that sometimes prove fatal (e.g.,
370 leukemia).

371
372 At present there is no way to predict who is likely to get aplastic anemia, nor is there a documented
373 effective means to monitor the patient so as to avoid and/or reduce the risk. Patients with a history of any
374 blood dyscrasia should not receive Felbatol®.

375
376 Patients should be advised to be alert for signs of infection, bleeding, easy bruising, or signs of anemia
377 (fatigue, weakness, lassitude, etc.) and should be advised to report to the physician immediately if any
378 such signs or symptoms appear.

379
380 Hepatic failure in the general population is relatively rare. The absolute risk for an individual patient is
381 not known with any degree of reliability but patients on Felbatol® are at a greater risk for developing
382 hepatic failure than the general population.

383
384 At present, there is no way to predict who is likely to develop hepatic failure, however, patients with a
385 history of hepatic dysfunction should not be started on Felbatol®.

386
387 Patients should be advised to follow their physician's directives for liver function testing both before
388 starting Felbatol® (felbamate) and at frequent intervals while taking Felbatol®.

389

390 Patients should be advised to be alert for signs of liver dysfunction (jaundice, anorexia, gastrointestinal
391 complaints, malaise, etc.) and to report them to their doctor immediately if they should occur.
392

393 **Laboratory Tests:** Full hematologic evaluations should be performed before Felbatol® therapy,
394 frequently during therapy, and for a significant period of time after discontinuation of Felbatol® therapy.
395 While it might appear prudent to perform frequent CBCs in patients continuing on Felbatol®, there is no
396 evidence that such monitoring will allow early detection of marrow suppression before aplastic anemia
397 occurs. (See **Boxed Warnings**). Complete pretreatment blood counts, including platelets and
398 reticulocytes should be obtained as a baseline. If any hematologic abnormalities are detected during the
399 course of treatment, immediate consultation with a hematologist is advised. Felbatol® should be
400 discontinued if any evidence of bone marrow depression occurs.

401
402 See Box Warnings for recommended monitoring of serum transaminases. If significant, confirmed liver
403 abnormalities are detected during the course of Felbatol® treatment, Felbatol® should be discontinued
404 immediately with continued liver function monitoring until values return to normal. (see **PATIENT**
405 **INFORMATION/CONSENT**).
406

407 **Suicidal Thinking and Behavior** - Patients, their caregivers, and families should be counseled
408 that AEDs, including Felbatol®, may increase the risk of suicidal thoughts and behavior and
409 should be advised of the need to be alert for the emergence or worsening of symptoms of
410 depression, any unusual changes in mood or behavior, or the emergence of suicidal thoughts,
411 behavior, or thoughts about self-harm. Behaviors of concern should be reported immediately to
412 healthcare providers.
413

414 **Pregnancy:** Patients should be encouraged to enroll in the North American Antiepileptic Drug
415 (NAAED) Pregnancy Registry if they become pregnant. This registry is collecting information
416 about the safety of antiepileptic drugs during pregnancy. To enroll, patients can call the toll free
417 number 1-888-233-2334 (see Pregnancy section).
418

419 **Drug Interactions:**

420 The drug interaction data described in this section were obtained from controlled clinical trials and studies
421 involving otherwise healthy adults with epilepsy.
422

423 **Use in Conjunction with Other Antiepileptic Drugs (See DOSAGE AND ADMINISTRATION):**
424

425 **The addition of Felbatol® to antiepileptic drugs (AEDs) affects the steady-state plasma**
426 **concentrations of AEDs.** The net effect of these interactions is summarized in Table 2:
427

Table 2 Steady-State Plasma Concentrations of Felbatol When Coadministered With Other AEDs		
AED Coadministered	AED Concentration	Felbatol® Concentration
Phenytoin	↑	↓
Valproate	↑	↔**
Carbamazepine (CBZ)	↓	↓
*CBZ epoxide	↑	
Phenobarbital	↑	↓
*Not significant but an active metabolite of carbamazepine. **No significant effect.		

428

429 **Specific Effects of Felbatol® on Other Antiepileptic Drugs:**

430 **Phenytoin** : Felbatol® causes an increase in steady-state phenytoin plasma concentrations. In 10
431 otherwise healthy subjects with epilepsy ingesting phenytoin, the steady-state trough (C_{min}) phenytoin
432 plasma concentration was 17±5 micrograms/mL. The steady-state C_{min} increased to 21±5
433 micrograms/mL when 1200 mg/day of felbamate was coadministered. Increasing the felbamate dose to
434 1800 mg/day in six of these subjects increased the steady-state phenytoin C_{min} to 25±7 micrograms/mL.
435 In order to maintain phenytoin levels, limit adverse experiences, and achieve the felbamate dose of 3600
436 mg/day, a phenytoin dose reduction of approximately 40% was necessary for eight of these 10 subjects.
437

438 In a controlled clinical trial, a 20% reduction of the phenytoin dose at the initiation of Felbatol® therapy
439 resulted in phenytoin levels comparable to those prior to Felbatol® administration.
440

441 **Carbamazepine** : Felbatol® causes a decrease in the steady-state carbamazepine plasma concentrations
442 and an increase in the steady-state carbamazepine epoxide plasma concentration. In nine otherwise
443 healthy subjects with epilepsy ingesting carbamazepine, the steady-state trough (C_{min}) carbamazepine
444 concentration was 8±2 micrograms/mL. The carbamazepine steady-state C_{min} decreased 31% to 5±1
445 micrograms/mL when felbamate (3000 mg/day, divided into three doses) was coadministered.
446 Carbamazepine epoxide steady-state C_{min} concentrations increased 57% from 1.0±0.3 to 1.6±0.4
447 micrograms/mL with the addition of felbamate.
448

449 In clinical trials, similar changes in carbamazepine and carbamazepine epoxide were seen.
450

451 **Valproate** : Felbatol® causes an increase in steady-state valproate concentrations. In four subjects with
452 epilepsy ingesting valproate, the steady-state trough (C_{min}) valproate plasma concentration was 63±16
453 micrograms/mL. The steady-state C_{min} increased to 78±14 micrograms/mL when 1200 mg/day of
454 felbamate was coadministered. Increasing the felbamate dose to 2400 mg/day increased the steady-state
455 valproate C_{min} to 96±25 micrograms/mL. Corresponding values for free valproate C_{min} concentrations
456 were 7±3, 9±4, and 11±6 micrograms/mL for 0, 1200, and 2400 mg/day Felbatol®, respectively. The
457 ratios of the AUCs of unbound valproate to the AUCs of the total valproate were 11.1%, 13.0%, and
458 11.5%, with coadministration of 0, 1200, and 2400 mg/day of Felbatol®, respectively. This indicates that
459 the protein binding of valproate did not change appreciably with increasing doses of Felbatol®.
460

461 **Phenobarbital** : Coadministration of felbamate with phenobarbital causes an increase in phenobarbital
462 plasma concentrations. In 12 otherwise healthy male volunteers ingesting phenobarbital, the steady-state
463 trough (C_{min}) phenobarbital concentration was 14.2 micrograms/mL. The steady-state C_{min}
464 concentration increased to 17.8 micrograms/mL when 2400 mg/day of felbamate was coadministered for
465 one week.
466

467 *Effects of Other Antiepileptic Drugs on Felbatol®:*

468 **Phenytoin** : Phenytoin causes an approximate doubling of the clearance of Felbatol® (felbamate) at
469 steady state and, therefore, the addition of phenytoin causes an approximate 45% decrease in the steady-
470 state trough concentrations of Felbatol® as compared to the same dose of Felbatol® given as
471 monotherapy.
472

473 **Carbamazepine** : Carbamazepine causes an approximate 50% increase in the clearance of Felbatol® at
474 steady state and, therefore, the addition of carbamazepine results in an approximate 40% decrease in the
475 steady-state trough concentrations of Felbatol® as compared to the same dose of Felbatol® given as
476 monotherapy.
477

478 **Valproate** : Available data suggest that there is no significant effect of valproate on the clearance of
479 Felbatol® at steady state. Therefore, the addition of valproate is not expected to cause a clinically
480 important effect on Felbatol® (felbamate) plasma concentrations.
481

482 **Phenobarbital** : It appears that phenobarbital may reduce plasma felbamate concentrations. Steady-state
483 plasma felbamate concentrations were found to be 29% lower than the mean concentrations of a group of
484 newly diagnosed subjects with epilepsy also receiving 2400 mg of felbamate a day.
485

486 **Effects of Antacids on Felbatol®:**

487 The rate and extent of absorption of a 2400 mg dose of Felbatol® as monotherapy given as tablets was
488 not affected when coadministered with antacids.
489

490 **Effects of Erythromycin on Felbatol®:**

491 The coadministration of erythromycin (1000 mg/day) for 10 days did not alter the pharmacokinetic
492 parameters of C_{max}, C_{min}, AUC, Cl/kg or t_{max} at felbamate daily doses of 3000 or 3600 mg/day in 10
493 otherwise healthy subjects with epilepsy.
494

495 **Effects of Felbatol® on Low-Dose Combination Oral Contraceptives:**

496 A group of 24 nonsmoking, healthy white female volunteers established on an oral contraceptive regimen
497 containing 30 µg ethinyl estradiol and 75 µg gestodene for at least 3 months received 2400 mg/day of
498 felbamate from midcycle (day 15) to midcycle (day 14) of two consecutive oral contraceptive cycles.
499 Felbamate treatment resulted in a 42% decrease in the gestodene AUC 0-24, but no clinically relevant
500 effect was observed on the pharmacokinetic parameters of ethinyl estradiol. No volunteer showed
501 hormonal evidence of ovulation, but one volunteer reported intermenstrual bleeding during felbamate
502 treatment.
503

504 **Drug/Laboratory Test Interactions:** There are no known interactions of Felbatol® with commonly used
505 laboratory tests.
506

507 **Carcinogenesis, Mutagenesis, Impairment of Fertility:** Carcinogenicity studies were conducted in mice
508 and rats. Mice received felbamate as a feed admixture for 92 weeks at doses of 300, 600, and 1200 mg/kg
509 and rats were also dosed by feed admixture for 104 weeks at doses of 30, 100, and 300 (males) or 10, 30,
510 and 100 (females) mg/kg. The maximum doses in these studies produced steady-state plasma
511 concentrations that were equal to or less than the steady-state plasma concentrations in epileptic patients
512 receiving 3600 mg/day. There was a statistically significant increase in hepatic cell adenomas in high-
513 dose male and female mice and in high-dose female rats. Hepatic hypertrophy was significantly increased
514 in a dose-related manner in mice, primarily males, but also in females. Hepatic hypertrophy was not
515 found in female rats. The relationship between the occurrence of benign hepatocellular adenomas and the
516 finding of liver hypertrophy resulting from liver enzyme induction has not been examined. There was a
517 statistically significant increase in benign interstitial cell tumors of the testes in high-dose male rats
518 receiving felbamate. The relevance of these findings to humans is unknown.
519

520 As a result of the synthesis process, felbamate could contain small amounts of two known animal
521 carcinogens, the genotoxic compound ethyl carbamate (urethane) and the nongenotoxic compound methyl
522 carbamate. It is theoretically possible that a 50 kg patient receiving 3600 mg of felbamate could be
523 exposed to up to 0.72 micrograms of urethane and 1800 micrograms of methyl carbamate. These daily
524 doses are approximately 1/35,000 (urethane) and 1/5,500 (methyl carbamate) on a mg/kg basis, and
525 1/10,000 (urethane) and 1/1,600 (methyl carbamate) on a mg/m² basis, of the dose levels shown to be
526 carcinogenic in rodents. Any presence of these two compounds in felbamate used in the lifetime
527 carcinogenicity studies was inadequate to cause tumors.

528

529 Microbial and mammalian cell assays revealed no evidence of mutagenesis in the Ames *Salmonella*
530 /microsome plate test, CHO/HGPRT mammalian cell forward gene mutation assay, sister chromatic
531 exchange assay in CHO cells, and bone marrow cytogenetics assay.

532

533 Reproduction and fertility studies in rats showed no effects on male or female fertility at oral doses of up
534 to 13.9 times the human total daily dose of 3600 mg on a mg/kg basis, or up to 3 times the human total
535 daily dose on a mg/m² basis.

536

537 **Pregnancy: Pregnancy Category C.** The incidence of malformations was not increased compared to
538 control in offspring of rats or rabbits given doses up to 13.9 times (rat) and 4.2 times (rabbit) the human
539 daily dose on a mg/kg basis, or 3 times (rat) and less than 2 times (rabbit) the human daily dose on a
540 mg/m² basis. However, in rats, there was a decrease in pup weight and an increase in pup deaths during
541 lactation. The cause for these deaths is not known. The no effect dose for rat pup mortality was 6.9 times
542 the human dose on a mg/kg basis or 1.5 times the human dose on a mg/m² basis.

543

544 Placental transfer of felbamate occurs in rat pups. There are, however, no studies in pregnant women.
545 Because animal reproduction studies are not always predictive of human response, this drug should be
546 used during pregnancy only if clearly needed.

547

548 To provide information regarding the effects of in utero exposure to Felbatol®, physicians are
549 advised to recommend that pregnant patients taking Felbatol enroll in the NAAED Pregnancy
550 Registry. This can be done by calling the toll free number 1-888-233-2334, and must be done by
551 patients themselves. Information on the registry can also be found at the website
552 <http://www.aedpregnancyregistry.org/>.

553

554 **Labor and Delivery:** The effect of felbamate on labor and delivery in humans is unknown.

555

556 **Nursing Mothers:** Felbamate has been detected in human milk. The effect on the nursing infant is
557 unknown (see **Pregnancy** section).

558

559 **Pediatric Use:** The safety and effectiveness of Felbatol® in children other than those with Lennox-
560 Gastaut syndrome has not been established.

561

562 **Geriatric Use:** No systematic studies in geriatric patients have been conducted. Clinical studies of
563 Felbatol® did not include sufficient numbers of patients aged 65 and over to determine whether they
564 respond differently from younger patients. Other reported clinical experience has not identified
565 differences in responses between the elderly and younger patients. In general, dosage selection for an
566 elderly patient should be cautious, usually starting at the low end of the dosing range, reflecting the
567 greater frequency of decreased hepatic, renal, or cardiac function, and of concomitant disease or other
568 drug therapy.

569

570 **ADVERSE REACTIONS**

571 **To report SUSPECTED ADVERSE REACTIONS, contact Meda Pharmaceuticals at**
572 **1-800-526-3840 or FDA at 1-800-FDA-1088 or www.fda.gov/medwatch.**

573

574 The most common adverse reactions seen in association with Felbatol® (felbamate) in adults during
575 monotherapy, are anorexia, vomiting, insomnia, nausea, and headache. The most common adverse

576 reactions seen in association with Felbatol® in adults during adjunctive therapy are anorexia, vomiting,
577 insomnia, nausea, dizziness, somnolence, and headache.

578
579 The most common adverse reactions seen in association with Felbatol® in children during adjunctive
580 therapy are anorexia, vomiting, insomnia, headache, and somnolence.

581
582 The dropout rate because of adverse experiences or intercurrent illnesses among adult felbamate patients
583 was 12 percent (120/977). The dropout rate because of adverse experiences or intercurrent illnesses
584 among pediatric felbamate patients was six percent (22/357). In adults, the body systems associated with
585 causing these withdrawals in order of frequency were: digestive (4.3%), psychological (2.2%), whole
586 body (1.7%), neurological (1.5%), and dermatological (1.5%). In children, the body systems associated
587 with causing these withdrawals in order of frequency were: digestive (1.7%), neurological (1.4%),
588 dermatological (1.4%), psychological (1.1%), and whole body (1.0%). In adults, specific events with an
589 incidence of 1% or greater associated with causing these withdrawals, in order of frequency were:
590 anorexia (1.6%), nausea (1.4%), rash (1.2%), and weight decrease (1.1%). In children, specific events
591 with an incidence of 1% or greater associated with causing these withdrawals, in order of frequency was
592 rash (1.1%).

593
594 **Incidence in Clinical Trials:**

595 The prescriber should be aware that the figures cited in the following table cannot be used to predict the
596 incidence of side effects in the course of usual medical practice where patient characteristics and other
597 factors differ from those which prevailed in the clinical trials. Similarly, the cited frequencies cannot be
598 compared with figures obtained from other clinical investigations involving different investigators,
599 treatments, and uses including the use of Felbatol® (felbamate) as adjunctive therapy where the incidence
600 of adverse events may be higher due to drug interactions. The cited figures, however, do provide the
601 prescribing physician with some basis for estimating the relative contribution of drug and nondrug factors
602 to the side effect incidence rate in the population studied.

603
604 **Adults**

605 **Incidence in Controlled Clinical Trials--Monotherapy Studies in Adults:**

606 The table that follows enumerates adverse events that occurred at an incidence of 2% or more among 58
607 adult patients who received Felbatol® monotherapy at dosages of 3600 mg/day in double-blind controlled
608 trials. Table 3 presents reported adverse events that were classified using standard WHO-based dictionary
609 terminology.
610

Table 3 Adults Treatment-Emergent Adverse Event Incidence in Controlled Monotherapy Trials		
	Felbatol® (N=58)	Low Dose Valproate** (N=50)
Body System Event	%	%
Body as a Whole		
Fatigue	6.9	4.0
Weight Decrease	3.4	0
Face Edema	3.4	0
Central Nervous System		
Insomnia	8.6	4.0
Headache	6.9	18.0
Anxiety	5.2	2.0
Dermatological		
Acne	3.4	0
Rash	3.4	0

Digestive		
Dyspepsia	8.6	2.0
Vomiting	8.6	2.0
Constipation	6.9	2.0
Diarrhea	5.2	0
SGPT Increased	5.2	2.0
Metabolic/Nutritional		
Hypophosphatemia	3.4	0
Respiratory		
Upper Respiratory Tract Infection	8.6	4.0
Rhinitis	6.9	0
Special Senses		
Diplopia	3.4	4.0
Otitis Media	3.4	0
Urogenital		
Intramenstrual Bleeding	3.4	0
Urinary Tract Infection	3.4	2.0
*3600 mg/day, ** 15 mg/kg/day		

611

612 **Incidence in Controlled Add-On Clinical Studies in Adults:**

613 Table 4 enumerates adverse events that occurred at an incidence of 2% or more among 114 adult patients
614 who received Felbatol® adjunctive therapy in add-on controlled trials at dosages up to 3600 mg/day.

615 Reported adverse events were classified using standard WHO-based dictionary terminology.

616

617 Many adverse experiences that occurred during adjunctive therapy may be a result of drug interactions.

618 Adverse experiences during adjunctive therapy typically resolved with conversion to monotherapy, or

619 with adjustment of the dosage of other antiepileptic drugs.

620

Table 4 Adults Treatment-Emergent Adverse Event Incidence in Controlled Add-On Trials		
	Felbatol®	Placebo
	(N=114)	(N=43)
Body System/Event	%	%
Body as a Whole		
Fatigue	16.8	7.0
Fever	2.6	4.7
Chest Pain	2.6	0
Central Nervous System		
Headache	36.8	9.3
Somnolence	19.3	7.0
Dizziness	18.4	14.0
Insomnia	17.5	7.0
Nervousness	7.0	2.3
Tremor	6.1	2.3
Anxiety	5.3	4.7
Gait Abnormal	5.3	0
Depression	5.3	0
Paraesthesia	3.5	2.3
Ataxia	3.5	0
Mouth Dry	2.6	0
Stupor	2.6	0
Dermatological		
Rash	3.5	4.7
Digestive		
Nausea	34.2	2.3
Anorexia	19.3	2.3
Vomiting	16.7	4.7
Dyspepsia	12.3	7.0
Constipation	11.4	2.3
Diarrhea	5.3	2.3
Abdominal Pain	5.3	0
SGPT Increased	3.5	0
Musculoskeletal		
Myalgia	2.6	0
Respiratory		
Upper Respiratory Tract Infection		
Sinusitis	5.3	7.0
Pharyngitis	3.5	0
	2.6	0
Special Senses		
Diplopia	6.1	0
Taste Perversion	6.1	0
Vision Abnormal	5.3	2.3

621
622

623
624
625
626
627
628

Children

Incidence in a Controlled Add-On Trial in Children with Lennox-Gastaut Syndrome:

Table 5 enumerates adverse events that occurred more than once among 31 pediatric patients who received Felbatol® up to 45 mg/kg/day or a maximum of 3600 mg/day. Reported adverse events were classified using standard WHO-based dictionary terminology.

Table 5 Children Treatment-Emergent Adverse Event Incidence in Controlled Add-On Lenox Trials		
	Felbatol® (N=31)	Placebo (N=27)
Body System/Event	%	%
Body as a Whole		
Fever	22.6	11.1
Fatigue	9.7	3.7
Weight Decrease	6.5	0
Pain	6.5	0
Central Nervous System		
Somnolence	48.4	11.1
Insomnia	16.1	14.8
Nervousness	16.1	18.5
Gait Abnormal	9.7	0
Headache	6.5	18.5
Thinking Abnormal	6.5	3.7
Ataxia	6.5	3.7
Urinary Incontinence	6.5	7.4
Emotional Lability	6.5	0
Miosis	6.5	0
Dermatological		
Rash	9.7	7.4
Digestive		
Anorexia	54.8	14.8
Vomiting	38.7	14.8
Constipation	12.9	0
Hiccup	9.7	3.7
Nausea	6.5	0
Dyspepsia	6.5	3.7
Hematologic		
Purpura	12.9	7.4
Leukopenia	6.5	0
Respiratory		
Upper Respiratory Tract Infection	45.2	25.9
Pharyngitis	9.7	3.7
Coughing	6.5	0
Special Senses		
Otitis Media	9.7	0

629
630
631

Other Events Observed in Association with the Administration of Felbatol® (felbamate):

632 In the paragraphs that follow, the adverse clinical events, other than those in the preceding tables, that
633 occurred in a total of 977 adults and 357 children exposed to Felbatol® (felbamate) and that are
634 reasonably associated with its use are presented. They are listed in order of decreasing frequency.
635 Because the reports cite events observed in open-label and uncontrolled studies, the role of Felbatol® in
636 their causation cannot be reliably determined.

637
638 Events are classified within body system categories and enumerated in order of decreasing frequency
639 using the following definitions: frequent adverse events are defined as those occurring on one or more
640 occasions in at least 1/100 patients; infrequent adverse events are those occurring in 1/100-1/1000
641 patients; and rare events are those occurring in fewer than 1/1000 patients.

642
643 Event frequencies are calculated as the number of patients reporting an event divided by the total number
644 of patients (N=1334) exposed to Felbatol®.

645
646 **Body as a Whole:** *Frequent:* Weight increase, asthenia, malaise, influenza-like symptoms; *Rare:*
647 anaphylactoid reaction, chest pain substernal.

648 **Cardiovascular:** *Frequent:* Palpitation, tachycardia; *Rare:* supraventricular tachycardia.

649 **Central Nervous System:** *Frequent:* Agitation, psychological disturbance, aggressive reaction;
650 *Infrequent:* hallucination, euphoria, suicide attempt, migraine.

651 **Digestive:** *Frequent:* SGOT increased; *Infrequent:* esophagitis, appetite increased; *Rare:* GGT elevated.

652 **Hematologic:** *Infrequent:* Lymphadenopathy, leukopenia, leukocytosis, thrombocytopenia,
653 granulocytopenia; *Rare:* antinuclear factor test positive, qualitative platelet disorder, agranulocytosis.

654 **Metabolic/Nutritional:** *Infrequent:* Hypokalemia, hyponatremia, LDH increased, alkaline phosphatase
655 increased, hypophosphatemia; *Rare:* creatinine phosphokinase increased.

656 **Musculoskeletal:** *Infrequent:* Dystonia.

657 **Dermatological:** *Frequent:* Pruritus; *Infrequent:* urticaria, bullous eruption; *Rare:* buccal mucous
658 membrane swelling, Stevens-Johnson Syndrome.

659 **Special Senses:** *Rare:* Photosensitivity allergic reaction.

660

661 **Postmarketing Adverse Event Reports:**

662 Voluntary reports of adverse events in patients taking Felbatol® (usually in conjunction with other drugs)
663 have been received since market introduction and may have no causal relationship with the drug(s). These
664 include the following by body system:

665 **Body as a Whole:** neoplasm, sepsis, L.E. syndrome, SIDS, sudden death, edema, hypothermia, rigors,
666 hyperpyrexia.

667 **Cardiovascular:** atrial fibrillation, atrial arrhythmia, cardiac arrest, torsade de pointes, cardiac failure,
668 hypotension, hypertension, flushing, thrombophlebitis, ischemic necrosis, gangrene, peripheral ischemia,
669 bradycardia, Henoch-Schönlein purpura (vasculitis).

670 **Central & Peripheral Nervous System:** delusion, paralysis, mononeuritis, cerebrovascular disorder,
671 cerebral edema, coma, manic reaction, encephalopathy, paranoid reaction, nystagmus, choreoathetosis,
672 extrapyramidal disorder, confusion, psychosis, status epilepticus, dyskinesia, dysarthria, respiratory
673 depression, apathy, concentration impaired.

674 **Dermatological:** abnormal body odor, sweating, lichen planus, livedo reticularis, alopecia, toxic
675 epidermal necrolysis.

676 **Digestive:** (Refer to **WARNINGS**) hepatitis, hepatic failure, G.I. hemorrhage, hyperammonemia,
677 pancreatitis, hematemesis, gastritis, rectal hemorrhage, flatulence, gingival bleeding, acquired megacolon,
678 ileus, intestinal obstruction, enteritis, ulcerative stomatitis, glossitis, dysphagia, jaundice, gastric ulcer,
679 gastric dilatation, gastroesophageal reflux.

680 **Fetal Disorders:** fetal death, microcephaly, genital malformation, anencephaly, encephalocele.

681 **Hematologic:** (Refer to **WARNINGS**) increased and decreased prothrombin time, anemia, hypochromic
682 anemia, aplastic anemia, pancytopenia, hemolytic uremic syndrome, increased mean corpuscular volume

683 (mcv) with and without anemia, coagulation disorder, embolism-limb, disseminated intravascular
684 coagulation, eosinophilia, hemolytic anemia, leukemia, including myelogenous leukemia, and lymphoma,
685 including T-cell and B-cell lymphoproliferative disorders.

686 **Metabolic/Nutritional:** hypernatremia, hypoglycemia, SIADH, hypomagnesemia, dehydration,
687 hyperglycemia, hypocalcemia.

688 **Musculoskeletal:** arthralgia, muscle weakness, involuntary muscle contraction, rhabdomyolysis.

689 **Respiratory:** dyspnea, pneumonia, pneumonitis, hypoxia, epistaxis, pleural effusion, respiratory
690 insufficiency, pulmonary hemorrhage, asthma.

691 **Special Senses:** hemianopsia, decreased hearing, conjunctivitis.

692 **Urogenital** menstrual disorder, acute renal failure, hepatorenal syndrome, hematuria, urinary retention,
693 nephrosis, vaginal hemorrhage, abnormal renal function, dysuria, placental disorder.

694

695 **DRUG ABUSE AND DEPENDENCE**

696 **Abuse:** Abuse potential was not evaluated in human studies.

697

698 **Dependence:** Rats administered felbamate orally at doses 8.3 times the recommended human dose 6 days
699 each week for 5 consecutive weeks demonstrated no signs of physical dependence as measured by weight
700 loss following drug withdrawal on day 7 of each week.

701

702 **OVERDOSAGE**

703 Four subjects inadvertently received Felbatol® (felbamate) as adjunctive therapy in dosages ranging from
704 5400 to 7200 mg/day for durations between 6 and 51 days. One subject who received 5400 mg/day as
705 monotherapy for 1 week reported no adverse experiences. Another subject attempted suicide by ingesting
706 12,000 mg of Felbatol® in a 12-hour period. The only adverse experiences reported were mild gastric
707 distress and a resting heart rate of 100 bpm. No serious adverse reactions have been reported.

708 General supportive measures should be employed if overdosage occurs. It is not known if felbamate is
709 dialyzable.

710

711 **DOSAGE AND ADMINISTRATION**

712 Felbatol® (felbamate) has been studied as monotherapy and adjunctive therapy in adults and as
713 adjunctive therapy in children with seizures associated with Lennox-Gastaut syndrome. As Felbatol® is
714 added to or substituted for existing AEDs, it is strongly recommended to reduce the dosage of those
715 AEDs in the range of 20-33% to minimize side effects (see **Drug Interactions** subsection).

716

717 **Dosage Adjustment in the Renally Impaired:** Felbamate should be used with caution in patients with
718 renal dysfunction. In the renally impaired, starting and maintenance doses should be reduced by one-half
719 (See CLINICAL PHARMACOLOGY / Pharmacokinetics and PRECAUTIONS). Adjunctive therapy
720 with medications which affect felbamate plasma concentrations, especially AEDs, may warrant further
721 reductions in felbamate daily doses in patients with renal dysfunction.

722

723 **Adults (14 years of age and over)**

724 The majority of patients received 3600 mg/day in clinical trials evaluating its use as both monotherapy
725 and adjunctive therapy.

726

727 **Monotherapy:** (Initial therapy) Felbatol® (felbamate) has not been systematically evaluated as initial
728 monotherapy. Initiate Felbatol® at 1200 mg/day in divided doses three or four times daily. The prescriber
729 is advised to titrate previously untreated patients under close clinical supervision, increasing the dosage in
730 600-mg increments every 2 weeks to 2400 mg/day based on clinical response and thereafter to 3600
731 mg/day if clinically indicated.

732

733 **Conversion to Monotherapy:** Initiate Felbatol® at 1200 mg/day in divided doses three or four times
734 daily. Reduce the dosage of concomitant AEDs by one-third at initiation of Felbatol® therapy. At week 2,
735 increase the Felbatol® dosage to 2400 mg/day while reducing the dosage of other AEDs up to an
736 additional one-third of their original dosage. At week 3, increase the Felbatol® dosage up to 3600 mg/day
737 and continue to reduce the dosage of other AEDs as clinically indicated.

738
739 **Adjunctive Therapy:** Felbatol® should be added at 1200 mg/day in divided doses three or four times
740 daily while reducing present AEDs by 20% in order to control plasma concentrations of concurrent
741 phenytoin, valproic acid, phenobarbital, and carbamazepine and its metabolites. Further reductions of the
742 concomitant AEDs dosage may be necessary to minimize side effects due to drug interactions. Increase
743 the dosage of Felbatol® by 1200 mg/day increments at weekly intervals to 3600 mg/day. Most side
744 effects seen during Felbatol® adjunctive therapy resolve as the dosage of concomitant AEDs is
745 decreased.
746

	WEEK 1 REDUCE original dose by 20–33%*	WEEK 2 REDUCE original dose by up to an additional 1/3*	WEEK 3 REDUCE as clinically indicated
Dosage reduction of concomitant AEDs			
Felbatol® Dosage	1200 mg/day Initial dose	2400 mg/day Therapeutic dosage range	3600 mg/day Therapeutic dosage range

*See *Adjunctive* and *Conversion to Monotherapy* sections.

747
748 While the above Felbatol® conversion guidelines may result in a Felbatol® 3600 mg/day dose within 3
749 weeks, in some patients titration to a 3600 mg/day Felbatol® dose has been achieved in as little as 3 days
750 with appropriate adjustment of other AEDs.

751
752 **Children with Lennox-Gastaut Syndrome (Ages 2-14 years)**

753 **Adjunctive Therapy:** Felbatol® should be added at 15 mg/kg/day in divided doses three or four times
754 daily while reducing present AEDs by 20% in order to control plasma levels of concurrent phenytoin,
755 valproic acid, phenobarbital, and carbamazepine and its metabolites. Further reductions of the
756 concomitant AEDs dosage may be necessary to minimize side effects due to drug interactions. Increase
757 the dosage of Felbatol® by 15 mg/kg/day increments at weekly intervals to 45 mg/kg/day. Most side
758 effects seen during Felbatol® adjunctive therapy resolve as the dosage of concomitant AEDs is
759 decreased.

760
761 **HOW SUPPLIED**

762 Felbatol® (felbamate) Tablets, 400 mg, are yellow, scored, capsule-shaped tablets, debossed 0430 on one
763 side and FELBATOL 400 on the other; available in bottles of 100 (NDC 0037-0430-01). Felbatol®
764 (felbamate) Tablets, 600 mg, are peach-colored, scored, capsule-shaped tablets, debossed 0431
765 on one side and FELBATOL 600 on the other; available in bottles of 100 (NDC 0037-0431-01).
766 Felbatol® (felbamate) Oral Suspension, 600 mg/5 mL, is peach-colored; available in 8 oz bottles (NDC
767 0037-0442-67) and 32 oz bottles (NDC 0037-0442-17).

768
769 Shake suspension well before using. Store at controlled room temperature 20°-25°C (68°-77°F). Dispense
770 in tight container.

771
772 **To report SUSPECTED ADVERSE REACTIONS, contact Meda Pharmaceuticals at**
773 **1-800-526-3840 or FDA at 1-800-FDA-1088 or www.fda.gov/medwatch.**

774
775 MEDA Pharmaceuticals

776 MEDA Pharmaceuticals Inc.
777 Somerset, NJ 08873
778 IN-00431-19 Rev. MM/YY

779
780 PATIENT INFORMATION/CONSENT

781
782 FELBATOL® (felbamate) SHOULD NOT BE USED BY PATIENTS UNTIL THERE HAS BEEN A
783 COMPLETE DISCUSSION OF THE RISKS AND WRITTEN INFORMED CONSENT HAS BEEN
784 OBTAINED.

785
786 IMPORTANT INFORMATION AND WARNING:

787 Felbatol®, taken by itself or with other prescription and/or non-prescription drugs, can result in severe,
788 potentially fatal blood abnormality ("aplastic anemia") and/or severe, potentially fatal liver damage.

789 PATIENT CONSENT:

790
791 My [My son, daughter, ward _____]'s]
792 treatment with Felbatol® has been personally explained to me by Dr. _____.

793
794 The following points of information, among others, have been specifically discussed and made clear and I
795 have had the opportunity to ask any questions concerning this information:

796
797 1. I, _____ (Patient's Name),
798 understand that Felbatol® is used to treat certain types of seizures and my physician has told me that I
799 have this type(s) of seizures;
800 INITIALS: _____

801
802
803 2. I understand that Felbatol® is being used since my seizures have not been satisfactorily treated with
804 other antiepileptic drugs;
805 INITIALS: _____

806
807 3. I understand that there is a serious risk that I could develop aplastic anemia and/or liver failure, both of
808 which are potentially fatal, by using Felbatol®;
809 INITIALS: _____

810
811 4. I understand that there are no laboratory tests which will predict if I am at an increased risk for one of
812 the potentially fatal conditions;
813 INITIALS: _____

814
815 5. I understand that I should have the recommended blood work before my treatment with Felbatol® is
816 begun (baseline) and periodically thereafter as clinical judgement warrants. I understand that although this
817 blood work may help detect if I develop one of these conditions, it may do so only after significant,
818 irreversible and potentially fatal damage has already occurred;
819 INITIALS: _____

820
821 6. If I am currently taking another antiepileptic drug, I understand that the manufacturer of Felbatol®
822 recommends that the dosage of these other drugs be decreased by a certain amount when Felbatol® is
823 started; if my physician determines that this should not be done in my case, he/she has explained the
824 reason(s) for this decision;
825 INITIALS: _____

826

827 7. I understand that I must immediately report any unusual symptoms to Dr. _____
828 and be especially aware of any rashes, easy bruising, bleeding, sore throats, fever, and/or dark urine;
829 INITIALS: _____
830

831 8. I understand that antiepileptic drugs such as Felbatol® may increase the risk of suicidal thoughts and
832 behavior. I understand that I must immediately report any unusual changes in mood or behavior,
833 symptoms of depression or thoughts about self-harm to Dr. _____.
834 INITIALS: _____
835

836
837 **I now authorize Dr. _____ to begin my treatment**
838 **with Felbatol®; OR, if my treatment has already begun with Felbatol®, to continue such treatment.**
839

840 _____
841 **Patient, Parent, or Guardian**

842 _____
843 **Address**

844 _____
845 **Telephone**

846
847 PHYSICIAN STATEMENT:

848 I have fully explained to the patient, _____, the nature and
849 purpose of the treatment with Felbatol® (felbamate) and the potential risks associated with that treatment.
850 I have asked the patient if he/she has any questions regarding this treatment or the risks and have
851 answered those questions to the best of my ability. I also acknowledge that I have read and understand the
852 prescribing information listed above.
853

854 _____
855 Physician

856 _____ Date

857 **NOTE TO PHYSICIAN:** It is strongly recommended that you retain a signed copy of the informed
858 consent with the patient's medical records.
859

860 SUPPLY OF PATIENT INFORMATION/CONSENT FORMS:

861 A supply of "Patient Information/Consent" forms as printed above is available, free of charge, from your
862 local MEDA Pharmaceuticals representative, or may be obtained by calling 1-800-526-3840. Permission
863 to use the above Patient Information/Consent by photocopy reproduction is also hereby granted by
864 MEDA Pharmaceuticals Inc.

865
866 MEDA Pharmaceuticals
867 MEDA Pharmaceuticals Inc.
868 Somerset, NJ 08873