CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:
NDA 21-549/-002

Trade Name: EMEND 80 mg and 125 mg capsules

Generic Name: aprepitant

Sponsor: Merck and Company, Inc.

Approval Date: January 15, 2004
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APPLICATION NUMBER:
NDA 21-549/S-002

APPROVAL LETTER
NDA 21-549

Merck & Co., Inc.
Attention: Andrew Tershakovec, M.D.
Director, Regulatory Affairs
Sumneytown Pike
P.O. Box 4, BLA-20
West Point, PA 19486-0004

Dear Dr. Tershakovec:

Please refer to your supplemental new drug application dated July 17, 2003, received July 18, 2003, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Emend® (aprepitant) 80 mg and 125 mg Capsules.

This “Changes Being Effected” supplemental new drug application provides for editorial revisions to the CLINICAL PHARMACOLOGY, “Clinical Studies” subsection and the ADVERSE REACTION, “Laboratory Adverse Experiences” subsection of the package insert.

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

The final printed labeling (FPL) must be identical to the package insert submitted July 17, 2003.

Please submit the FPL electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format – NDA. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated “FPL for approved supplement NDA 21-549/S-002.” Approval of this submission by FDA is not required before the labeling is used.

If you issue a letter communicating important information about this drug product (i.e., a “Dear Health Care Professional” letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH, HFD-410
FDA
5600 Fishers Lane
Rockville, MD 20857
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 Dr. Betsy Scroggs, Consumer Safety Officer, at (301) 827-1250.

Sincerely,

{See appended electronic signature page}

Robert L. Justice, M.D., M.S.
Director
Division of Gastrointestinal and Coagulation Drug Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Joyce Korvick
1/15/04 01:29:12 PM
for Dr. Robert Justice
APPLICATION NUMBER:
NDA 21-549/S002

LABELING
EMEND®
(aprepitant)
CAPSULES

DESCRIPTION

EMEND® (aprepitant) is a substance P/neurokinin 1 (NK₁) receptor antagonist, chemically described as 5-[[2R,3S]-2-[(1R)-1-[3,5-bis(trifluoromethyl)phenyl]ethoxy]-3-(4-fluorophenyl)-4-morpholino][methyl]-1,2-dihydro-3H-1,2,4-triazol-3-one.

Its empirical formula is C₂₂H₂₁F₂N₂O₃, and its structural formula is:

![Structural formula of EMEND](image)

Aprepitant is a white to off-white crystalline solid, with a molecular weight of 534.43. It is practically insoluble in water. Aprepitant is sparingly soluble in ethanol and isopropyl acetate and slightly soluble in acetonitrile.

Each capsule of EMEND for oral administration contains either 80 mg or 125 mg of aprepitant and the following inactive ingredients: sucrose, microcrystalline cellulose, hydroxypropyl cellulose and sodium lauryl sulfate. The capsule shell excipients are gelatin and titanium dioxide. The 125-mg capsule also contains red ferric oxide and yellow ferric oxide.

CLINICAL PHARMACOLOGY

Mechanism of Action

Aprepitant is a selective high-affinity antagonist of human substance P/neurokinin 1 (NK₁) receptors. Aprepitant has little or no affinity for serotonin (5-HT₃), dopamine, and corticosteroid receptors, the targets of existing therapies for chemotherapy-induced nausea and vomiting (CINV).

Aprepitant has been shown in animal models to inhibit emesis induced by cytotoxic chemotherapeutic agents, such as cisplatin, via central actions. Animal and human Positron Emission Tomography (PET) studies with aprepitant have shown that it crosses the blood brain barrier and occupies brain NK₁ receptors. Animal and human studies show that aprepitant augments the antiemetic activity of the 5-HT₃-receptor antagonist ondansetron and the corticosteroid dexamethasone and inhibits both the acute and delayed phases of cisplatin-induced emesis.

Pharmacokinetics

Absorption

The mean absolute oral bioavailability of aprepitant is approximately 60 to 65% and the mean peak plasma concentration (Cₘₐₓ) of aprepitant occurred at approximately 4 hours (Tₘₐₓ). Oral
administration of the capsule with a standard breakfast had no clinically meaningful effect on the bioavailability of aprepitant.

The pharmacokinetics of aprepitant are non-linear across the clinical dose range. In healthy young adults, the increase in AUC₀₋₂₄hr was 26% greater than dose proportional between 80-mg and 125-mg single doses administered in the fed state.

Following oral administration of a single 125-mg dose of EMEND on Day 1 and 80 mg once daily on Days 2 and 3, the AUC₀₋₂₄hr was approximately 19.6 mcg•hr/mL and 21.2 mcg•hr/mL on Day 1 and Day 3, respectively. The Cₚmax of 1.6 mcg/mL and 1.4 mcg/mL were reached in approximately 4 hours (Tₚmax) on Day 1 and Day 3, respectively.

**Distribution**

Aprepitant is greater than 95% bound to plasma proteins. The mean apparent volume of distribution at steady state (Vdₚss) is approximately 70 L in humans.

Aprepitant crosses the placenta in rats and rabbits and crosses the blood brain barrier in humans (see CLINICAL PHARMACOLOGY, Mechanism of Action).

**Metabolism**

Aprepitant undergoes extensive metabolism. In vitro studies using human liver microsomes indicate that aprepitant is metabolized primarily by CYP3A4 with minor metabolism by CYP1A2 and CYP2C19. Metabolism is largely via oxidation at the morpholine ring and its side chains. No metabolism by CYP2D6, CYP2C9, or CYP2E1 was detected. In healthy young adults, aprepitant accounts for approximately 24% of the radioactivity in plasma over 72 hours following a single oral 300-mg dose of [¹⁴C]-aprepitant, indicating a substantial presence of metabolites in the plasma. Seven metabolites of aprepitant, which are only weakly active, have been identified in human plasma.

**Excretion**

Following administration of a single IV 100-mg dose of [¹⁴C]-aprepitant prodrug to healthy subjects, 57% of the radioactivity was recovered in urine and 45% in feces. A study was not conducted with radiolabeled capsule formulation. The results after oral administration may differ.

Aprepitant is eliminated primarily by metabolism; aprepitant is not renally excreted. The apparent plasma clearance of aprepitant ranged from approximately 62 to 90 mL/min. The apparent terminal half-life ranged from approximately 9 to 13 hours.

**Special Populations**

**Gender**

Following oral administration of a single 125-mg dose of EMEND, no difference in AUC₀₋₂₄hr was observed between males and females. The Cₚmax for aprepitant is 16% higher in females as compared with males. The half-life of aprepitant is 25% lower in females as compared with males and Tₚmax occurs at approximately the same time. These differences are not considered clinically meaningful. No dosage adjustment for EMEND is necessary based on gender.

**Geriatric**

Following oral administration of a single 125-mg dose of EMEND on Day 1 and 80 mg once daily on Days 2 through 5, the AUC₀₋₂₄hr of aprepitant was 21% higher on Day 1 and 36% higher on Day 5 in elderly (≥65 years) relative to younger adults. The Cₚmax was 10% higher on Day 1 and 24% higher on Day 5 in elderly relative to younger adults. These differences are not considered clinically meaningful. No dosage adjustment for EMEND is necessary in elderly patients.

**Pediatric**

The pharmacokinetics of EMEND have not been evaluated in patients below 18 years of age.

**Race**

Following oral administration of a single 125-mg dose of EMEND, the AUC₀₋₂₄hr is approximately 25% and 29% higher in Hispanics as compared with Whites and Blacks, respectively. The Cₚmax is 22% and 31% higher in Hispanics as compared with Whites and Blacks, respectively. These differences are not considered clinically meaningful. There was no difference
in AUC_0-24hr or C_max between Whites and Blacks. No dosage adjustment for EMEND is necessary based on race.

**Hepatic Insufficiency**

EMEND was well tolerated in patients with mild to moderate hepatic insufficiency. Following administration of a single 125-mg dose of EMEND on Day 1 and 80 mg once daily on Days 2 and 3 to patients with mild hepatic insufficiency (Child-Pugh score 5 to 6), the AUC_0-24hr of aprepitant was 11% lower on Day 1 and 36% lower on Day 3, as compared with healthy subjects given the same regimen. In patients with moderate hepatic insufficiency (Child-Pugh score 7 to 9), the AUC_0-24hr of aprepitant was 10% higher on Day 1 and 18% higher on Day 3, as compared with healthy subjects given the same regimen. These differences in AUC_0-24hr are not considered clinically meaningful; therefore, no dosage adjustment for EMEND is necessary in patients with mild to moderate hepatic insufficiency.

There are no clinical or pharmacokinetic data in patients with severe hepatic insufficiency (Child-Pugh score >9) (see PRECAUTIONS).

**Renal Insufficiency**

A single 240-mg dose of EMEND was administered to patients with severe renal insufficiency (CrCl < 30 mL/min) and to patients with end stage renal disease (ESRD) requiring hemodialysis.

In patients with severe renal insufficiency, the AUC_{0-∞} of total aprepitant (unbound and protein bound) decreased by 21% and C_max decreased by 32%, relative to healthy subjects. In patients with ESRD undergoing hemodialysis, the AUC_{0-∞} of total aprepitant decreased by 42% and C_max decreased by 32%. Due to modest decreases in protein binding of aprepitant in patients with renal disease, the AUC of pharmacologically active unbound drug was not significantly affected in patients with renal insufficiency compared with healthy subjects. Hemodialysis conducted 4 or 48 hours after dosing had no significant effect on the pharmacokinetics of aprepitant; less than 0.2% of the dose was recovered in the dialysate.

No dosage adjustment for EMEND is necessary for patients with renal insufficiency or for patients with ESRD undergoing hemodialysis.

**Clinical Studies**

Oral administration of EMEND in combination with ondansetron and dexamethasone (aprepitant regimen) has been shown to prevent acute and delayed nausea and vomiting associated with highly emetogenic chemotherapy including high-dose cisplatin.

In 2 multicenter, randomized, parallel, double-blind, controlled clinical studies, the aprepitant regimen (see table below) was compared with standard therapy in patients receiving a chemotherapy regimen that included cisplatin >50 mg/m² (mean cisplatin dose = 80.2 mg/m²). Of the 550 patients who were randomized to receive the aprepitant regimen, 42% were women, 58% men, 59% White, 3% Asian, 5% Black, 12% Hispanic American, and 21% Multi-Racial. The aprepitant-treated patients in these clinical studies ranged from 14 to 84 years of age, with a mean age of 56 years. 170 patients were 65 years or older, with 29 patients being 75 years or older.

Patients (N = 1105) were randomized to either the aprepitant regimen (N = 550) or standard therapy (N = 555). The treatment regimens are defined in the table below.

<table>
<thead>
<tr>
<th>Treatment Regimen</th>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aprepitant</td>
<td>Aprepitant 125 mg PO</td>
<td>Aprepitant 80 mg PO Daily (Days 2 and 3 only)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Dexamethasone 12 mg PO</td>
<td>Dexamethasone 8 mg PO Daily (morning)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ondansetron 32 mg IV</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standard Therapy</td>
<td>Dexamethasone 20 mg PO</td>
<td>Dexamethasone 8 mg PO Daily (morning)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ondansetron 32 mg IV</td>
<td>Dexamethasone 8 mg PO Daily (evening)</td>
<td></td>
</tr>
</tbody>
</table>

Aprepitant placebo and dexamethasone placebo were used to maintain blinding.

During these studies 95% of the patients in the aprepitant group received a concomitant chemotherapeutic agent in addition to protocol-mandated cisplatin. The most common
chemotherapeutic agents and the number of aprepitant patients exposed follows: etoposide (106), fluorouracil (100), gemcitabine (89), vinorelbine (82), paclitaxel (52), cyclophosphamide (50), doxorubicin (38), docetaxel (11).

The antiemetic activity of EMEND was evaluated during the acute phase (0 to 24 hours post-cisplatin treatment), the delayed phase (25 to 120 hours post-cisplatin treatment) and overall (0 to 120 hours post-cisplatin treatment) in Cycle 1. Efficacy was based on evaluation of the following endpoints:

Primary endpoint:
- complete response (defined as no emetic episodes and no use of rescue therapy)

Other prespecified (secondary and exploratory) endpoints:
- complete protection (defined as no emetic episodes, no use of rescue therapy, and a maximum nausea visual analogue scale [VAS] score <25 mm on a 0 to 100 mm scale)
- no emesis (defined as no emetic episodes regardless of use of rescue therapy)
- no nausea (maximum VAS <5 mm on a 0 to 100 mm scale)
- no significant nausea (maximum VAS <25 mm on a 0 to 100 mm scale)

A summary of the key study results from each individual study analysis is shown in Table 1 and in Table 2.

<table>
<thead>
<tr>
<th>ENDPOINTS</th>
<th>Aprepitant Regimen (N= 280)</th>
<th>Standard Therapy (N= 281)</th>
<th>p-Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRIMARY ENDPOINT</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Complete Response</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall³</td>
<td>73</td>
<td>52</td>
<td>&lt;0.001</td>
</tr>
</tbody>
</table>

OTHER PRESPECIFIED (SECONDARY AND EXPLORATORY) ENDPOINTS

<table>
<thead>
<tr>
<th>ENDPOINTS</th>
<th>Aprepitant Regimen (N= 280)</th>
<th>Standard Therapy (N= 281)</th>
<th>p-Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complete Response</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acute phase¹</td>
<td>89</td>
<td>78</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Delayed phase²</td>
<td>75</td>
<td>55</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Complete Protection</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>63</td>
<td>49</td>
<td>0.001</td>
</tr>
<tr>
<td>Acute phase</td>
<td>85</td>
<td>75</td>
<td>0.005</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>66</td>
<td>52</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>No Emesis</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>78</td>
<td>55</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Acute phase</td>
<td>90</td>
<td>79</td>
<td>0.001</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>81</td>
<td>59</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>No Nausea</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>48</td>
<td>44</td>
<td>&gt;0.050</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>51</td>
<td>48</td>
<td>&gt;0.050</td>
</tr>
<tr>
<td>No Significant Nausea</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>73</td>
<td>66</td>
<td>&gt;0.050</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>75</td>
<td>69</td>
<td>&gt;0.050</td>
</tr>
</tbody>
</table>

¹N: Number of patients (older than 18 years of age) who received cisplatin, study drug, and had at least one post-treatment efficacy evaluation.
²Overall: 0 to 120 hours post-cisplatin treatment.
³Acute phase: 0 to 24 hours post-cisplatin treatment.
⁴Delayed phase: 25 to 120 hours post-cisplatin treatment.
Visual analogue scale (VAS) score range: 0 mm = no nausea; 100 mm = nausea as bad as it could be.
Table 1 includes nominal p-values not adjusted for multiplicity.
### Table 2

Percent of Patients Responding by Treatment Group and Phase for Study 2 — Cycle 1

<table>
<thead>
<tr>
<th>ENDPOINTS</th>
<th>Aprepitant Regimen (N=281)</th>
<th>Standard Therapy (N=283)</th>
<th>p-Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRIMARY ENDPOINT</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Complete Response</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>63</td>
<td>43</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>OTHER PRESPECIFIED (SECONDARY AND EXPLORATORY) ENDPOINTS</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Complete Response</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acute phase</td>
<td>83</td>
<td>68</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>68</td>
<td>47</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Complete Protection</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>56</td>
<td>41</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Acute phase</td>
<td>80</td>
<td>65</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>61</td>
<td>44</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>No Emesis</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>66</td>
<td>44</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Acute phase</td>
<td>54</td>
<td>69</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>72</td>
<td>48</td>
<td>&lt;0.001</td>
</tr>
<tr>
<td>No Nausea</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>49</td>
<td>39</td>
<td>0.021</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>53</td>
<td>40</td>
<td>0.004</td>
</tr>
<tr>
<td>No Significant Nausea</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Overall</td>
<td>71</td>
<td>64</td>
<td>&gt;0.050</td>
</tr>
<tr>
<td>Delayed phase</td>
<td>73</td>
<td>65</td>
<td>&gt;0.050</td>
</tr>
</tbody>
</table>

- N: Number of patients (older than 18 years of age) who received cisplatin, study drug, and had at least one post-treatment efficacy evaluation.
- Overall: 0 to 120 hours post-cisplatin treatment.
- Acute phase: 0 to 24 hours post-cisplatin treatment.
- Delayed phase: 25 to 120 hours post-cisplatin treatment.
- Visual analogue scale (VAS) score range: 0 mm = no nausea; 100 mm = nausea as bad as it could be.
- Table 2 includes nominal p-values not adjusted for multiplicity.

In both studies, a statistically significantly higher proportion of patients receiving the aprepitant regimen in Cycle 1 had a complete response (primary endpoint), compared with patients receiving standard therapy. A statistically significant difference in complete response in favor of the aprepitant regimen was also observed when the acute phase and the delayed phase were analyzed separately.

In both studies, the estimated time to first emesis after initiation of cisplatin treatment was longer with the aprepitant regimen, and the incidence of first emesis was reduced in the aprepitant regimen group compared with standard therapy group as depicted in the Kaplan-Meier curves in Figure 1.
Figure 1: Percent of Patients Who Remain Emesis Free Over Time – Cycle 1

Study 1
Aprepitant Regimen (N=260)
Standard Therapy (N=261)

Study 2
Aprepitant Regimen (N=261)
Standard Therapy (N=263)

p-Value <0.001 based on a log rank test for Study 1 and Study 2; nominal p-values not adjusted for multiplicity.

Patient-Reported Outcomes: The impact of nausea and vomiting on patients’ daily lives was assessed in Cycle 1 of both Phase III studies using the Functional Living Index–Emesis (FLIE), a validated nausea- and vomiting-specific patient-reported outcome measure. Minimal or no impact of nausea and vomiting on patients’ daily lives is defined as a FLIE total score >108. In each of the 2 studies, a higher proportion of patients receiving the aprepitant regimen reported minimal or no impact of nausea and vomiting on daily life (Study 1: 74% versus 64%; Study 2: 75% versus 64%).

Multiple-Cycle Extension: In the same 2 clinical studies, patients continued into the Multiple-Cycle extension for up to 5 additional cycles of chemotherapy. The proportion of patients with no emesis and no significant nausea by treatment group at each cycle is depicted in Figure 2. Antiemetic effectiveness for the patients receiving the aprepitant regimen is maintained throughout repeat cycles for those patients continuing in each of the multiple cycles.

Figure 2: Proportion of Patients With No Emesis and No Significant Nausea by Treatment Group and Cycle

Study 1
Aprepitant Regimen
Standard Therapy

Study 2
Aprepitant Regimen
Standard Therapy

Aprepitant (N) 158 122 81 54 40 191 148 103 63 43
Standard (N) 177 111 68 37 29 216 167 112 74 43

INDICATIONS AND USAGE

EMEND, in combination with other antiemetic agents, is indicated for the prevention of acute and delayed nausea and vomiting associated with initial and repeat courses of highly emetogenic cancer chemotherapy, including high-dose cisplatin (see DOSAGE AND ADMINISTRATION).
CONTRAINDICATIONS

EMEND is a moderate CYP3A4 inhibitor. EMEND should not be used concurrently with pimozide, terfenadine, astemizole, or cisapride. Inhibition of cytochrome P450 isoenzyme 3A4 (CYP3A4) by aprepitant could result in elevated plasma concentrations of these drugs, potentially causing serious or life-threatening reactions (see PRECAUTIONS, Drug Interactions).

EMEND is contraindicated in patients who are hypersensitive to any component of the product.

PRECAUTIONS

General

EMEND should be used with caution in patients receiving concomitant medicinal products, including chemotherapy agents that are primarily metabolized through CYP3A4. Inhibition of CYP3A4 by aprepitant could result in elevated plasma concentrations of these concomitant medicinal products. The effect of EMEND on the pharmacokinetics of orally administered CYP3A4 substrates is expected to be greater than the effect of EMEND on the pharmacokinetics of intravenously administered CYP3A4 substrates (see PRECAUTIONS, Drug Interactions).

Chemotherapy agents that are known to be metabolized by CYP3A4 include docetaxel, paclitaxel, etoposide, irinotecan, ifosfamide, imatinib, vinorelbine, vinblastine and vincristine. In clinical studies, EMEND was administered commonly with etoposide, vinorelbine, or paclitaxel. The doses of these agents were not adjusted to account for potential drug interactions.

In a separate pharmacokinetic study in patients receiving docetaxel, which is also metabolized by CYP3A4, EMEND did not influence the pharmacokinetics of docetaxel.

Due to the small number of patients in clinical studies who received the CYP3A4 substrates vinblastine, vincristine, or ifosfamide, particular caution and careful monitoring are advised in patients receiving these agents or other chemotherapy agents metabolized primarily by CYP3A4 that were not studied (see PRECAUTIONS, Drug Interactions).

Chronic continuous use of EMEND for prevention of nausea and vomiting is not recommended because it has not been studied and because the drug interaction profile may change during chronic continuous use.

Coadministration of EMEND with warfarin may result in a clinically significant decrease in International Normalized Ratio (INR) of prothrombin time. In patients on chronic warfarin therapy, the INR should be closely monitored in the 2-week period, particularly at 7 to 10 days, following initiation of the 3-day regimen of EMEND with each chemotherapy cycle (see PRECAUTIONS, Drug Interactions).

The efficacy of oral contraceptives during administration of EMEND may be reduced. Although effects on contraception with a 3-day regimen of EMEND given concomitantly with oral contraceptives has not been studied, alternative or back-up methods of contraception should be used (see PRECAUTIONS, Drug Interactions).

There are no clinical or pharmacokinetic data in patients with severe hepatic insufficiency (Child-Pugh score > 9). Therefore, caution should be exercised when EMEND is administered in these patients (see CLINICAL PHARMACOLOGY, Special Populations, Hepatic Insufficiency and DOSAGE AND ADMINISTRATION).

Information for Patients

Physicians should instruct their patients to read the patient package insert before starting therapy with EMEND and to reread it each time the prescription is renewed.

Patients should be instructed to take EMEND only as prescribed. Patients should be advised to take their first dose (125 mg) of EMEND 1 hour prior to chemotherapy treatment.

EMEND may interact with some drugs including chemotherapy; therefore, patients should be advised to report to their doctor the use of any other prescription, non-prescription medication or herbal products.
Patients on chronic warfarin therapy should be instructed to have their clotting status closely monitored in the 2-week period, particularly at 7 to 10 days, following initiation of the 3-day regimen of EMEND with each chemotherapy cycle.

Administration of EMEND may reduce the efficacy of oral contraceptives. Patients should be advised to use alternative or back-up methods of contraception.

**Drug Interactions**

Aprepitant is a substrate, a moderate inhibitor, and an inducer of CYP3A4. Aprepitant is also an inducer of CYP2C9.

**Effect of aprepitant on the pharmacokinetics of other agents**

As a moderate inhibitor of CYP3A4, aprepitant can increase plasma concentrations of coadministered medicinal products that are metabolized through CYP3A4 (see CONTRAINDICATIONS).

Aprepitant has been shown to induce the metabolism of S(-) warfarin and tolbutamide, which are metabolized through CYP2C9. Coadministration of EMEND with these drugs or other drugs that are known to be metabolized by CYP2C9, such as phenytoin, may result in lower plasma concentrations of these drugs.

EMEND is unlikely to interact with drugs that are substrates for the P-glycoprotein transporter, as demonstrated by the lack of interaction of EMEND with digoxin in a clinical drug interaction study.

**5-HT\textsubscript{3} antagonists:** In clinical drug interaction studies, aprepitant did not have clinically important effects on the pharmacokinetics of ondansetron or granisetron. No clinical or drug interaction study was conducted with dolasetron.

**Corticosteroids:**

**Dexamethasone:** EMEND, when given as a regimen of 125 mg with dexamethasone coadministered orally as 20 mg on Day 1, and EMEND when given as 80 mg/day with dexamethasone coadministered orally as 8 mg on Days 2 through 5, increased the AUC of dexamethasone, a CYP3A4 substrate, by 2.2-fold on Days 1 and 5. The oral dexamethasone doses should be reduced by approximately 50% when coadministered with EMEND, to achieve exposures of dexamethasone similar to those obtained when it is given without EMEND. The daily dose of dexamethasone administered in clinical studies with EMEND reflects an approximate 50% reduction of the dose of dexamethasone (see DOSAGE AND ADMINISTRATION).

**Methylprednisolone:** EMEND, when given as a regimen of 125 mg on Day 1 and 80 mg/day on Days 2 and 3, increased the AUC of methylprednisolone, a CYP3A4 substrate, by 1.34-fold on Day 1 and by 2.5-fold on Day 3, when methylprednisolone was coadministered intravenously as 125 mg on Day 1 and orally as 40 mg on Days 2 and 3. The IV methylprednisolone dose should be reduced by approximately 25%, and the oral methylprednisolone dose should be reduced by approximately 50% when coadministered with EMEND to achieve exposures of methylprednisolone similar to those obtained when it is given without EMEND.

**Chemotherapeutic agents:** See PRECAUTIONS, General.

**Docetaxel:** In a pharmacokinetic study, EMEND did not influence the pharmacokinetics of docetaxel.

**Warfarin:** A single 125-mg dose of EMEND was administered on Day 1 and 80 mg/day on Days 2 and 3 to healthy subjects who were stabilized on chronic warfarin therapy. Although there was no effect of EMEND on the plasma AUC of R(+) or S(-) warfarin determined on Day 3, there was a 34% decrease in S(-) warfarin (a CYP2C9 substrate) trough concentration accompanied by a 14% decrease in the prothrombin time (reported as International Normalized Ratio or INR) 5 days after completion of dosing with EMEND. In patients on chronic warfarin therapy, the prothrombin time (INR) should be closely monitored in the 2-week period, particularly at 7 to 10 days, following initiation of the 3-day regimen of EMEND with each chemotherapy cycle.

**Tolbutamide:** EMEND, when given as 125 mg on Day 1 and 80 mg/day on Days 2 and 3, decreased the AUC of tolbutamide (a CYP2C9 substrate) by 23% on Day 4, 28% on Day 8, and
EMEND®
(aprepitant) 9565004

15% on Day 15, when a single dose of tolbutamide 500 mg was administered orally prior to the administration of the 3-day regimen of EMEND and on Days 4, 8, and 15.

Oral contraceptives: Aprepitant, when given once daily for 14 days as a 100-mg capsule with an oral contraceptive containing 35 mcg of ethinyl estradiol and 1 mg of norethindrone, decreased the AUC of ethinyl estradiol by 43%, and decreased the AUC of norethindrone by 8%; therefore, the efficacy of oral contraceptives during administration of EMEND may be reduced. Although a 3-day regimen of EMEND given concomitantly with oral contraceptives has not been studied, alternative or back-up methods of contraception should be used.

Midazolam: EMEND increased the AUC of midazolam, a sensitive CYP3A4 substrate, by 2.3-fold on Day 1 and 3.3-fold on Day 5, when a single oral dose of midazolam 2 mg was coadministered on Day 1 and Day 5 of a regimen of EMEND 125 mg on Day 1 and 80 mg/day on Days 2 through 5. The potential effects of increased plasma concentrations of midazolam or other benzodiazepines metabolized via CYP3A4 (alprazolam, triazolam) should be considered when coadministering these agents with EMEND.

In another study with intravenous administration of midazolam, EMEND was given as 125 mg on Day 1 and 80 mg/day on Days 2 and 3, and midazolam 2 mg IV was given prior to the administration of the 3-day regimen of EMEND and on Days 4, 8, and 15. EMEND increased the AUC of midazolam by 25% on Day 4 and decreased the AUC of midazolam by 19% on Day 8 relative to the dosing of EMEND on Days 1 through 3. These effects were not considered clinically significant. The AUC of midazolam on Day 15 was similar to that observed at baseline.

Effect of other agents on the pharmacokinetics of aprepitant

Aprepitant is a substrate for CYP3A4; therefore, coadministration of EMEND with drugs that inhibit CYP3A4 activity may result in increased plasma concentrations of aprepitant. Consequently, concomitant administration of EMEND with strong CYP3A4 inhibitors (e.g., ketoconazole, iraconazole, nefazodone, troleandomycin, clarithromycin, ritonavir, nefazodone) should be approached with caution. Because moderate CYP3A4 inhibitors (e.g., diltiazem) result in 2-fold increase in plasma concentrations of aprepitant, concomitant administration should also be approached with caution.

Aprepitant is a substrate for CYP3A4; therefore, coadministration of EMEND with drugs that strongly induce CYP3A4 activity (e.g., rifampin, carbamazepine, phenytoin) may result in reduced plasma concentrations of aprepitant that may result in decreased efficacy of EMEND.

Ketoconazole: When a single 125-mg dose of EMEND was administered on Day 5 of a 10-day regimen of 400 mg/day of ketoconazole, a strong CYP3A4 inhibitor, the AUC of aprepitant increased approximately 5-fold and the mean terminal half-life of aprepitant increased approximately 3-fold. Concomitant administration of EMEND with strong CYP3A4 inhibitors should be approached cautiously.

Rifampin: When a single 375-mg dose of EMEND was administered on Day 9 of a 14-day regimen of 600 mg/day of rifampin, a strong CYP3A4 inducer, the AUC of aprepitant decreased approximately 11-fold and the mean terminal half-life decreased approximately 3-fold.

Coadministration of EMEND with drugs that induce CYP3A4 activity may result in reduced plasma concentrations and decreased efficacy of EMEND.

Additional interactions

Diltiazem: In patients with mild to moderate hypertension, administration of aprepitant once daily, as a tablet formulation comparable to 230 mg of the capsule formulation, with diltiazem 120 mg 3 times daily for 5 days, resulted in a 2-fold increase of aprepitant AUC and a simultaneous 1.7-fold increase of diltiazem AUC. These pharmacokinetic effects did not result in clinically meaningful changes in ECG, heart rate or blood pressure beyond those changes induced by diltiazem alone.

Paroxetine: Coadministration of once daily doses of aprepitant, as a tablet formulation comparable to 85 mg or 170 mg of the capsule formulation, with paroxetine 20 mg once daily, resulted in a decrease in AUC by approximately 25% and Cmax by approximately 20% of both aprepitant and paroxetine.
EMEND®
(aprepitant) 9565901

Carcinogenesis, Mutagenesis, Impairment of Fertility

Three 2-year carcinogenicity studies of aprepitant (two in Sprague-Dawley rats and one in CD-1 mice) were conducted with aprepitant. Dose selection for the studies was based on saturation of absorption in both species. In the rat carcinogenicity studies, animals were treated with oral doses of 0.05, 0.25, 1, 5, 25, 125 mg/kg twice daily. The highest dose tested produced a systemic exposure to aprepitant (plasma AUC$_{0-24h}$) of 0.4 to 1.4 times the human exposure (AUC$_{0-24h}$ = 19.6 mcg•hr/mL) at the recommended dose of 125 mg/day. Treatment with aprepitant at doses of 5 to 125 mg/kg twice per day produced thyroid follicular cell adenomas and carcinomas in male rats. In female rats, it produced increased incidences of hepatocellular adenoma at 25 and 125 mg/kg twice daily, and thyroid follicular adenoma at the 125 mg/kg twice daily dose. In the mouse carcinogenicity study, animals were treated with oral doses of 2.5, 25, 125, and 500 mg/kg/day. The highest tested dose produced a systemic exposure of about 2.2 to 2.7 times the human exposure at the recommended dose. Treatment with aprepitant produced skin fibrosarcomas in male mice of 125 and 500 mg/kg/day groups.

Aprepitant was not genotoxic in the Ames test, the human lymphoblastoid cell (TK6) mutagenesis test, the rat hepatocyte DNA strand break test, the Chinese hamster ovary (CHO) cell chromosome aberration test and the mouse micronucleus test.

Aprepitant did not affect the fertility or general reproductive performance of male or female rats at doses up to the maximum feasible dose of 1000 mg/kg twice daily (providing exposure in male rats lower than the exposure at the recommended human dose and exposure in female rats at about 1.6 times the human exposure).

Pregnancy. Teratogenic Effects: Category B. Teratology studies have been performed in rats at oral doses up to 1000 mg/kg twice daily (plasma AUC$_{0-24h}$ of 31.3 mcg•hr/mL, about 1.6 times the human exposure at the recommended dose) and in rabbits at oral doses up to 25 mg/kg/day (plasma AUC$_{0-24h}$ of 26.9 mcg•hr/mL, about 1.4 times the human exposure at the recommended dose) and have revealed no evidence of impaired fertility or harm to the fetus due to aprepitant. There are, however, no adequate and well-controlled studies in pregnant women. Because animal reproduction studies are not always predictive of human response, this drug should be used during pregnancy only if clearly needed.

Nursing Mothers

Aprepitant is excreted in the milk of rats. It is not known whether this drug is excreted in human milk. Because many drugs are excreted in human milk and because of the potential for possible serious adverse reactions in nursing infants from aprepitant and because of the potential for tumorigenicity shown for aprepitant in rodent carcinogenicity studies, a decision should be made whether to discontinue nursing or to discontinue the drug, taking into account the importance of the drug to the mother.

Pediatric Use

Safety and effectiveness of EMEND in pediatric patients have not been established.

Geriatric Use

In 2 well-controlled clinical studies, of the total number of patients (N=544) treated with EMEND, 31% were 65 and over, while 5% were 75 and over. No overall differences in safety or effectiveness were observed between these subjects and younger subjects. Greater sensitivity of some older individuals cannot be ruled out. Dosage adjustment in the elderly is not necessary.

ADVERSE REACTIONS

The overall safety of aprepitant was evaluated in approximately 3300 individuals.

In 2 well-controlled clinical trials in patients receiving highly emetogenic cancer chemotherapy, 544 patients were treated with aprepitant during Cycle 1 of chemotherapy and 413 of these patients continued into the Multiple-Cycle extension for up to 6 cycles of chemotherapy. EMEND was given in combination with ondansetron and dexamethasone and was generally well
tolerated. Most adverse experiences reported in these clinical studies were described as mild to moderate in intensity.

In Cycle 1, clinical adverse experiences were reported in approximately 69% of patients treated with the aprepitant regimen compared with approximately 68% of patients treated with standard therapy. Table 3 shows the percent of patients with clinical adverse experiences reported at an incidence ≥3% during Cycle 1 of the 2 combined Phase III studies.

Table 3

Percent of Patients With Clinical Adverse Experiences (Incidence ≥3%)
in CINV Phase III Studies (Cycle 1)

<table>
<thead>
<tr>
<th>Body as a Whole/ Site Unspecified</th>
<th>Aprepitant Regimen (N = 544)</th>
<th>Standard Therapy (N = 550)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abdominal Pain</td>
<td>4.6</td>
<td>3.3</td>
</tr>
<tr>
<td>Asthenia/Fatigue</td>
<td>17.8</td>
<td>11.8</td>
</tr>
<tr>
<td>Dehydration</td>
<td>5.9</td>
<td>5.1</td>
</tr>
<tr>
<td>Dizziness</td>
<td>6.8</td>
<td>4.4</td>
</tr>
<tr>
<td>Fever</td>
<td>2.9</td>
<td>3.5</td>
</tr>
<tr>
<td>Mucous Membrane Disorder</td>
<td>2.6</td>
<td>3.1</td>
</tr>
<tr>
<td>Digestive System</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Constipation</td>
<td>10.3</td>
<td>12.2</td>
</tr>
<tr>
<td>Diarrhea</td>
<td>10.3</td>
<td>7.5</td>
</tr>
<tr>
<td>Epigastric Discomfort</td>
<td>4.0</td>
<td>3.1</td>
</tr>
<tr>
<td>Gastritis</td>
<td>4.2</td>
<td>3.1</td>
</tr>
<tr>
<td>Heartburn</td>
<td>5.3</td>
<td>4.9</td>
</tr>
<tr>
<td>Nausea</td>
<td>12.7</td>
<td>11.8</td>
</tr>
<tr>
<td>Vomiting</td>
<td>7.5</td>
<td>7.6</td>
</tr>
<tr>
<td>Eyes, Ears, Nose, and Throat</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tinnitus</td>
<td>3.7</td>
<td>3.8</td>
</tr>
<tr>
<td>Hemic and Lymphatic System</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Neutropenia</td>
<td>3.1</td>
<td>2.9</td>
</tr>
<tr>
<td>Metabolism and Nutrition</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Anorexia</td>
<td>10.1</td>
<td>9.5</td>
</tr>
<tr>
<td>Nervous System</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Headache</td>
<td>8.5</td>
<td>8.7</td>
</tr>
<tr>
<td>Insomnia</td>
<td>2.9</td>
<td>3.1</td>
</tr>
<tr>
<td>Respiratory System</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hiccups</td>
<td>10.8</td>
<td>5.6</td>
</tr>
</tbody>
</table>

The following additional clinical adverse experiences (incidence >0.5% and greater than standard therapy), regardless of causality, were reported in patients treated with aprepitant regimen:

Body as a whole: diaphoresis, edema, flushing, malaise, malignant neoplasm, pelvic pain, septic shock, upper respiratory infection.

Cardiovascular system: deep venous thrombosis, hypertension, hypotension, myocardial infarction, pulmonary embolism, tachycardia.

Digestive system: acid reflux, deglutition disorder, dysgeusia, dyspepsia, dysphagia, flatulence, obstipation, salivation increased, taste disturbance.

Endocrine system: diabetes mellitus.

Eyes, ears, nose, and throat: nasal secretion, pharyngitis, vocal disturbance.

Hemic and lymphatic system: anemia, febrile neutropenia, thrombocytopenia.

Metabolism and nutrition: appetite decreased, hypokalemia, weight loss.
Musculoskeletal system: muscular weakness, musculoskeletal pain, myalgia.
Nervous system: peripheral neuropathy, sensory neuropathy.
Psychiatric disorder: anxiety disorder, confusion, depression.
Respiratory system: cough, dyspnea, lower respiratory infection, non-small cell lung carcinoma, pneumonia, respiratory insufficiency.
Skin and skin appendages: alopecia, rash.
Urogenital system: dysuria, renal insufficiency.

Laboratory Adverse Experiences
Table 4 shows the percent of patients with laboratory adverse experiences reported at an incidence ≥3% during Cycle 1 of the 2 combined Phase III studies.

| Percent of Patients With Laboratory Adverse Experiences (Incidence ≥3%) in CINV Phase III Studies (Cycle 1) |
|-------------------------------------------------|-------------------------------------------------|
| Aprepitant Regimen (N = 544) | Standard Therapy (N = 550) |
| ALT Increased | 6.0 | 4.3 |
| AST Increased | 5.0 | 1.3 |
| Blood Urea Nitrogen Increased | 4.7 | 3.5 |
| Serum Creatinine Increased | 3.7 | 4.3 |
| Proteinuria | 6.8 | 5.3 |

The following additional laboratory adverse experiences (incidence >0.5% and greater than standard therapy), regardless of causality, were reported in patients treated with aprepitant regimen: alkaline phosphatase increased, hyperglycemia, hyponatremia, leukocytes increased, erythrocyturia, leukocycturia.

The adverse experiences of increased AST and ALT were generally mild and transient.

The adverse experience profile in the Multiple-Cycle extension for up to 6 cycles of chemotherapy was generally similar to that observed in Cycle 1.

In addition, isolated cases of serious adverse experiences, regardless of causality, of bradycardia, disorientation, and perforating duodenal ulcer were reported in CINV clinical studies.

Stevens-Johnson syndrome was reported in a patient receiving aprepitant with cancer chemotherapy in another CINV study. Angioedema and urticaria were reported in a patient receiving aprepitant in a non-CINV study.

OVERDOSAGE

No specific information is available on the treatment of overdosage with EMEND. Single doses up to 600 mg of aprepitant were generally well tolerated in healthy subjects. Aprepitant was generally well tolerated when administered as 375 mg once daily for up to 42 days to patients in non-CINV studies. In 33 cancer patients, administration of a single 375-mg dose of aprepitant on Day 1 and 250 mg once daily on Days 2 to 5 was generally well tolerated.

Drowsiness and headache were reported in one patient who ingested 1440 mg of aprepitant.

In the event of overdose, EMEND should be discontinued and general supportive treatment and monitoring should be provided. Because of the antiemetic activity of aprepitant, drug-induced emesis may not be effective.

Aprepitant cannot be removed by hemodialysis.
EMEND®
(aprepitant)

DOSAGE AND ADMINISTRATION

EMEND is given for 3 days as part of a regimen that includes a corticosteroid and a 5-HT3 antagonist. The recommended dose of EMEND is 125 mg orally 1 hour prior to chemotherapy treatment (Day 1) and 80 mg once daily in the morning on Days 2 and 3. EMEND has not been studied for the treatment of established nausea and vomiting.

In clinical studies, the following regimen was used:

<table>
<thead>
<tr>
<th></th>
<th>Day 1</th>
<th>Day 2</th>
<th>Day 3</th>
<th>Day 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>EMEND*</td>
<td>125 mg</td>
<td>80 mg</td>
<td>80 mg</td>
<td>none</td>
</tr>
<tr>
<td>Dexamethasone**</td>
<td>12 mg orally</td>
<td>8 mg orally</td>
<td>8 mg orally</td>
<td>8 mg orally</td>
</tr>
<tr>
<td>Ondansetron†</td>
<td>32 mg IV</td>
<td>none</td>
<td>none</td>
<td>none</td>
</tr>
</tbody>
</table>

*EMEND was administered orally 1 hour prior to chemotherapy treatment on Day 1 and in the morning on Days 2 and 3.
**Dexamethasone was administered 30 minutes prior to chemotherapy treatment on Day 1 and in the morning on Days 2 through 4. The dose of dexamethasone was chosen to account for drug interactions.
†Ondansetron was administered 30 minutes prior to chemotherapy treatment on Day 1.

Chronic continuous administration is not recommended (see PRECAUTIONS).

See PRECAUTIONS, Drug Interactions for additional information on dose adjustment for corticosteroids when coadministered with EMEND.

Refer to the full prescribing information for coadministered antiemetic agents.

EMEND may be taken with or without food.

No dosage adjustment is necessary for the elderly.
No dosage adjustment is necessary for patients with renal insufficiency or for patients with end stage renal disease undergoing hemodialysis.
No dosage adjustment is necessary for patients with mild to moderate hepatic insufficiency (Child-Pugh score 5 to 9). There are no clinical data in patients with severe hepatic insufficiency (Child-Pugh score >9).

HOW SUPPLIED

No. 3854 — 80 mg capsules: White, opaque, hard gelatin capsule with “461” and “80 mg” printed radially in black ink on the body. They are supplied as follows:
NDC 0006-0461-30 bottles of 30 (with desiccant)
NDC 0006-0461-05 unit-dose packages of 5.
No. 3855 — 125 mg capsules: Opaque, hard gelatin capsule with white body and pink cap with “462” and “125 mg” printed radially in black ink on the body. They are supplied as follows:
NDC 0006-0462-30 bottles of 30 (with desiccant)
NDC 0006-0462-05 unit-dose packages of 5.
No. 3862 — Unit-of-use tri-fold pack containing one 125 mg capsule and two 80 mg capsules.
NDC 0006-3862-03.

Storage
Bottles: Store at 20-25°C (68-77°F) [see USP Controlled Room Temperature]. The desiccant should remain in the original bottle.
Blisters: Store at 20-25°C (68-77°F) [see USP Controlled Room Temperature].

Rx only

MERCK & CO., INC., Whitehouse Station, NJ 08889, USA

Issued May 2003
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Division of Gastrointestinal & Coagulation Drug Products

REGULATORY PROJECT MANAGER REVIEW

Application Numbers:  NDA 21-549/SLR-002 for Emend® (aprepitant)
80 mg and 125 mg Capsules

Sponsor:  Merck & Co., Inc.
Submission Date:  July 17, 2003
Receipt Date:  July 18, 2003

Material Reviewed

Background and Summary Description:  NDA 21-549 for Emend® (aprepitant)
80 mg and 125 mg Capsules was approved March 26, 2003 and is indicated for the prevention of
acute and delayed nausea and vomiting associated with initial and repeat courses of highly
emetogenic cancer chemotherapy, including high-dose cisplatin.

This supplement provides for editorial changes under the CLINICAL PHARMACOLOGY,
“Clinical Studies” subsection and ADVERSE REACTION, “Laboratory Adverse Experiences”
subsection of the package insert.

Review:  Deletions are shown as strikeouts and additions are shown as double underlines. The
following revisions were noted.

Package Insert
The submitted draft package, identified as “9565001” was compared to the package insert
identified as “9565000,” approved on March 26, 2003.

1. The identifier is located in the upper right corner of each page of the package insert and
has been revised to read:

   “956500[H]”

Comment:  This is an acceptable revision.

2. In the CLINICAL PHARMACOLOGY section, “Clinical Studies” subsection, the first
sentence in the first paragraph has been revised to read:

   “Multiple-Cycle Extension:  In the same 2 clinical studies, patients continued
into the Multiple-Cycle extension for up to 5 additional [x] cycles of
chemotherapy.”
Comment: Based on conversation with the medical reviewer, this editorial revision is acceptable.

3. In the ADVERSE REACTIONS section, Table 4 in the “Laboratory Adverse Experiences” subsection, the phrase Serum Creatine has been revised to read:

“Serum Creatinine.”

Comment: Based on conversation with the medical reviewer, this is a correction in spelling and is an acceptable editorial revision.

Conclusions

The submitted labeling is acceptable based on conversation with the medical reviewer. An approval letter will be drafted.

Betsy Scroggs, Pharm. D.  
Consumer Safety Officer

Brian Strongin, R.Ph., MBA  
Supervisory Consumer Safety Officer

Gary Della’Zanna, M.D.  
Medical Reviewer
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/
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Betsy Scroggs
1/13/04 03:54:50 PM
CSO

Brian Strongin
1/13/04 03:59:16 PM
CSO

Ruyi He
1/13/04 05:56:54 PM
MEDICAL OFFICER