Approval Package for:

APPLICATION NUMBER: 761051Orig1s000

Trade Name: Poteligeo® injection

Generic or Established: mogamulizumab-kpkc

Sponsor: Kyowa Kirin, Inc.

Approval Date: August 8, 2018

Indication: For the treatment of adult patients with relapsed or refractory mycosis fungoides (MF) or Sézary syndrome (SS) after at least one prior systemic therapy.
## CONTENTS

**Reviews / Information Included in this NDA Review.**

<table>
<thead>
<tr>
<th>Review Type</th>
<th>Included</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approval Letter</td>
<td>X</td>
</tr>
<tr>
<td>Other Action Letters</td>
<td></td>
</tr>
<tr>
<td>Labeling</td>
<td>X</td>
</tr>
<tr>
<td>REMS</td>
<td></td>
</tr>
<tr>
<td>Officer/Employee List</td>
<td>X</td>
</tr>
<tr>
<td>Multidiscipline Review(s)</td>
<td>X</td>
</tr>
<tr>
<td>- Summary Review</td>
<td></td>
</tr>
<tr>
<td>- Office Director</td>
<td></td>
</tr>
<tr>
<td>- Cross Discipline Team Leader</td>
<td></td>
</tr>
<tr>
<td>- Clinical</td>
<td></td>
</tr>
<tr>
<td>- Non-Clinical</td>
<td></td>
</tr>
<tr>
<td>- Statistical</td>
<td></td>
</tr>
<tr>
<td>- Clinical Pharmacology</td>
<td></td>
</tr>
<tr>
<td>Product Quality Review(s)</td>
<td>X</td>
</tr>
<tr>
<td>Clinical Microbiology / Virology Review(s)</td>
<td></td>
</tr>
<tr>
<td>Other Reviews</td>
<td>X</td>
</tr>
<tr>
<td>Risk Assessment and Risk Mitigation Review(s)</td>
<td>X</td>
</tr>
<tr>
<td>Proprietary Name Review(s)</td>
<td>X</td>
</tr>
<tr>
<td>Administrative/Correspondence Document(s)</td>
<td>X</td>
</tr>
</tbody>
</table>
APPLICATION NUMBER:

761051Orig1s000

APPROVAL LETTER
BLA 761051

KYOWA KIRIN, INC.
c/o KYOWA KIRIN PHARMACEUTICAL DEVELOPMENT, INC.
ATTENTION: JENNIFER JONES, MS, RAC
ASSOCIATE DIRECTOR, REGULATORY AFFAIRS
212 CARNEGIE CENTER, SUITE 400
PRINCETON, NJ 08540

DEAR MS. JONES:

PLEASE REFER TO YOUR BIOLOGIES LICENSE APPLICATION (BLA) DATED OCTOBER 4, 2017, RECEIVED OCTOBER 4, 2017, AND YOUR AMENDMENTS, SUBMITTED UNDER SECTION 351(a) OF THE PUBLIC HEALTH SERVICE ACT FOR POTELIGEO® (MOGAMLULIZUMAB-KPKC) INJECTION.

WE ACKNOWLEDGE RECEIPT OF YOUR MAJOR AMENDMENT DATED MAY 2, 2018, WHICH EXTENDED THE GOAL DATE BY THREE MONTHS.

LICENSED

WE ARE ISSUING DEPARTMENT OF HEALTH AND HUMAN SERVICES U.S. LICENSE NO. 2077 TO KYOWA KIRIN, INC., BEDMINSTER, NJ, UNDER THE PROVISIONS OF SECTION 351(a) OF THE PUBLIC HEALTH SERVICE ACT CONTROLLING THE MANUFACTURE AND SALE OF BIOLOGICAL PRODUCTS. THE LICENSE AUTHORIZES YOU TO INTRODUCE OR DELIVER FOR INTRODUCTION INTO INTERSTATE COMMERCE, THOSE PRODUCTS FOR WHICH YOUR COMPANY HAS DEMONSTRATED COMPLIANCE WITH ESTABLISHMENT AND PRODUCT STANDARDS.

UNDER THIS LICENSE, YOU ARE AUTHORIZED TO MANUFACTURE THE PRODUCT POTELIGEO (MOGAMLULIZUMAB-KPKC). POTELIGEO IS INDICATED FOR THE TREATMENT OF ADULT PATIENTS WITH RELAPSED OR REFRACTORY MYCOSIS FUNGOIDES (MF) OR SÉZARY SYNDROME (SS) AFTER AT LEAST ONE PRIOR SYSTEMIC THERAPY.

MANUFACTURING LOCATIONS

UNDER THIS LICENSE, YOU ARE APPROVED TO MANUFACTURE MOGAMLULIZUMAB-KPKC DRUG SUBSTANCE AT KYOWA HAKKO KIRIN CO., LTD. IN TAKASAKI, SHI, GUNMA, JAPAN. THE FINAL FORMULATED DRUG PRODUCT WILL BE MANUFACTURED AND FILLED AT KYOWA KIRIN CO., LTD. IN TAKASAKI, SHI, GUNMA, JAPAN. THE FINAL DRUG PRODUCT WILL BE LABELED AND PACKAGED AT AND AT

YOU MAY LABEL YOUR PRODUCT WITH THE
proprietary name, Poteligeo, and market it at a strength of 20 mg per 5 mL (4 mg/mL) in a single-dose vial for injection.

**DATING PERIOD**

The dating period for Poteligeo shall be 36 months from the date of manufacture when stored at 2-8 °C. The date of manufacture shall be defined as the date of final sterile filtration of the formulated drug product. The dating period for your drug substance shall be [blank] from the date of manufacture when stored at [blank].

**FDA LOT RELEASE**

You are not currently required to submit samples of future lots of Poteligeo to the Center for Drug Evaluation and Research (CDER) for release by the Director, CDER, under 21 CFR 610.2. We will continue to monitor compliance with 21 CFR 610.1, requiring completion of tests for conformity with standards applicable to each product prior to release of each lot.

Any changes in the manufacturing, testing, packaging, or labeling of Poteligeo, or in the manufacturing facilities, will require the submission of information to your biologics license application for our review and written approval, consistent with 21 CFR 601.12.

**APPROVAL & LABELING**

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

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 601.14(b)] in structured product labeling (SPL) format, as described at [http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm](http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm). Content of labeling must be identical to the enclosed labeling (text for the package insert, text for the patient package insert). Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at [http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf](http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf).

The SPL will be accessible via publicly available labeling repositories.

**CARTON AND IMMEDIATE CONTAINER LABELS**

Submit final printed carton and container labels that are identical to the carton and immediate container labels submitted on March 13, 2018 (carton), and August 7, 2018 (container), as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled *Providing Regulatory Submissions in*
Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (May 2015, Revision 3). For administrative purposes, designate this submission “Final Printed Carton and Container Labels for approved BLA 761051.” Approval of this submission by FDA is not required before the labeling is used.

ADVISORY COMMITTEE

Your application for mogamulizumab-kpkc was not referred to an FDA advisory committee because the application did not raise significant public health questions on the role of the biologic in the treatment of the disease.

REQUIRED PEDIATRIC ASSESSMENTS

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

Because this drug product for this indication has an orphan drug designation, you are exempt from this requirement.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to assess a signal of increased risk of complications after allogeneic hematopoietic stem cell transplantation in recipients of pre-transplantation mogamulizumab-kpkc.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess this serious risk.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following study:

PMR 3459-1 Characterize complications after allogeneic hematopoietic stem cell transplantation (HSCT) following mogamulizumab-kpkc in at least 50 patients with hematologic malignancies (at least 40 with cutaneous T-cell lymphoma), of whom at least two-thirds received mogamulizumab-kpkc as the last regimen prior to HSCT. Evaluate toxicities at least through transplant Day 180, and include
details of prior mogamulizumab-kpkc treatment and the transplant regimen. Characterize toxicities including grade II-IV acute graft-versus-host disease (GVHD), severe (grade III-IV) acute GVHD, steroid-refractory acute GVHD, grade 4, potentially immune-mediated adverse events, graft failure, hepatic veno-occlusive disease, critical illness, and non-relapse mortality and the cause. The study may characterize toxicities prospectively, or through a combination of prospective and retrospective data analysis. Utilize registry data (for example the Center for International Blood and Marrow Transplantation Research registry) to inform the analysis.

The timetable you submitted on July 26, 2018, states that you will conduct this study according to the following schedule:

Draft Protocol Submission: 10/2018
Final Protocol Submission: 01/2019
Interim Report Submission: 07/2021
Study Completion: 02/2024
Final Report Submission: 08/2024

Submit clinical protocol(s) to your IND 101843 with a cross-reference letter to this BLA. Submit nonclinical and chemistry, manufacturing, and controls protocols and all final report(s) to your BLA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate:

**Required Postmarketing Protocol Under 505(o), Required Postmarketing Final Report Under 505(o), Required Postmarketing Correspondence Under 505(o).**

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 601.70 requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 601.70 to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 601.70. We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

**PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:
As required under 21 CFR 601.12(f)(4), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf. Information and Instructions for completing the form can be found at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

REPORTING REQUIREMENTS

You must submit adverse experience reports under the adverse experience reporting requirements for licensed biological products (21 CFR 600.80). You should submit postmarketing adverse experience reports to:

Food and Drug Administration
Center for Drug Evaluation and Research
Central Document Room
5901-B Ammendale Road
Beltsville, MD 20705-1266

Prominently identify all adverse experience reports as described in 21 CFR 600.80.

You must submit distribution reports under the distribution reporting requirements for licensed biological products (21 CFR 600.81).

You must submit reports of biological product deviations under 21 CFR 600.14. You should promptly identify and investigate all manufacturing deviations, including those associated with processing, testing, packing, labeling, storage, holding and distribution. If the deviation involves a distributed product, may affect the safety, purity, or potency of the product, and meets the other criteria in the regulation, you must submit a report on Form FDA-3486 to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Compliance Risk Management and Surveillance
5901-B Ammendale Road
Beltsville, MD 20705-1266
Biological product deviations, sent by courier or overnight mail, should be addressed to:

Food and Drug Administration  
Center for Drug Evaluation and Research 
Division of Compliance Risk Management and Surveillance  
10903 New Hampshire Avenue, Bldg. 51, Room 4206  
Silver Spring, MD  20903

**MEDWATCH-TO-MANUFACTURER PROGRAM**

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at [http://www.fda.gov/Safety/MedWatch/HowToReport/ucm166910.htm](http://www.fda.gov/Safety/MedWatch/HowToReport/ucm166910.htm).

**POST APPROVAL FEEDBACK MEETING**

New molecular entities and new biologics qualify for a post approval feedback meeting. Such meetings are used to discuss the quality of the application and to evaluate the communication process during drug development and marketing application review. The purpose is to learn from successful aspects of the review process and to identify areas that could benefit from improvement. If you would like to have such a meeting with us, call the Regulatory Project Manager for this application.

If you have any questions, contact Katie Chon, Regulatory Project Manager, at [katie.chon@fda.hhs.gov](mailto:katie.chon@fda.hhs.gov) or (240) 402-6578.

Sincerely,

{See appended electronic signature page}

Richard Pazdur, MD  
Director  
Office of Hematology and Oncology Products  
Center for Drug Evaluation and Research

**ENCLOSURE:**

Content of Labeling
This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

ANN T FARRELL
08/08/2018
Signing on behalf of Dr. Pazdur