



Our STN: BL 125488/0

Instituto Bioclon, S.A. de C.V.  
Attention: Ms. Jennifer Spinella  
Rare Disease Therapeutics, Inc.  
9550 Cuyamaca Street, Suite 203  
Santee, CA 92071

Dear Ms. Spinella:

This letter is in regard to your biologics license application (BLA) for Crotalidae (pit viper) Immune F(ab')<sub>2</sub> (Equine) Injection manufactured at your Tlalpan, Mexico and (b) (4) Mexico locations, submitted under section 351 of the Public Health Service Act (42 U.S.C. 262).

We have completed our review of all the submissions you have made relating to this BLA. After our complete review, we have concluded that we cannot grant final approval because of the deficiencies outlined below.

CMC:

1. We are unable to complete the final approval action pending the review of the January 14-23, 2014 inspection of your Tlalpan, Mexico D.F., Mexico facility.
2. Cleaning validation for the filling equipment is not complete. Please submit the final study for the cleaning validation in your complete response to this letter.

We stopped the review clock with the issuance of this letter. We will reset and start the review clock when we receive your complete response.

Within 10 days after the date of this letter, you should take one of the following actions: (1) amend the application; (2) notify us of your intent to file an amendment; or (3) withdraw the application.

You may request a meeting or teleconference with us to discuss the steps necessary for approval. For PDUFA products please submit your meeting request as described in our "Guidance for Industry: Formal Meetings With Sponsors and Applicants for PDUFA Products," dated February 2000. This document is available on the internet at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM079744.pdf> or may be requested from the Office of Communication, Outreach, and Development, at (301) 827-1800. For non-PDUFA products, please contact the regulatory

project manager. For details, please also follow the instructions described in CBER's SOPP 8101.1: Scheduling and Conduct of Regulatory Review Meetings with Sponsors and Applicants. This document also is available on the internet at <http://www.fda.gov/BiologicsBloodVaccines/GuidanceComplianceRegulatoryInformation/ProceduresSOPPs/ucm079448.htm>, or may be requested from the Office of Communication, Outreach, and Development.

Please be advised that, as stated in 21 CFR 601.3(c), if we do not receive your complete response within one year of the date of this letter, we may consider your failure to resubmit to be a request to withdraw the application. Reasonable requests for an extension of time in which to resubmit will be granted. However, failure to resubmit the application within the extended time period may also be considered a request for withdrawal of the application.

FDA has contracted with Eastern Research Group, Inc. (ERG) to conduct an independent interim and final assessment of the Program for Enhanced Review Transparency and Communication for NME NDAs and Original BLAs under PDUFA V ('the Program'). The PDUFA V Commitment Letter states that these assessments will include interviews with applicants following FDA action on applications reviewed in the Program. For this purpose, first-cycle actions include approvals, complete responses, and withdrawals after filing. The purpose of the interview is to better understand applicant experiences with the Program and its ability to improve transparency and communication during FDA review.

ERG will contact you to schedule a PDUFA V applicant interview and provide specifics about the interview process. Your responses during the interview will be confidential with respect to the FDA review team. ERG has signed a non-disclosure agreement and will not disclose any identifying information to anyone outside their project team. They will report only anonymized results and findings in the interim and final assessments. Members of the FDA review team will be interviewed by ERG separately. While your participation in the interview is voluntary, your feedback will be helpful to these assessments.

If you have any questions regarding the above, please contact the Regulatory Project Manager, Edward Thompson, at (301) 827-9167.

Sincerely,

Basil Golding, MD  
Director  
Division of Hematology  
Office of Blood Research and Review  
Center for Biologics  
Evaluation and Research