

MEMORANDUM
Department of Health and Human Services
Public Health Service
Food and Drug Administration
Center for Biologics Evaluation and Research

Date: August 05, 2016

From: Kristine Khuc, Pharm.D.
Consumer Safety Officer
Advertising and Promotional Labeling Branch (APLB)
Division of Case Management (DCM)
Office of Compliance and Biologics Quality (OCBQ)

Through: Lisa Stockbridge, Ph.D.
Branch Chief
APLB/DCM/OCBQ

To: Thomas Maruna, RPM, OBRR/DBCD
Lisa Faulcon, M.D., Clinical Reviewer, OBRR/DHCR/CRB
Mikhail Ovanesov, Ph.D., Chairperson, OBRR/DHRR/LH

Subject: Labeling Review- **ANDEXXA** (Coagulation Factor Xa (Recombinant), Inactivated)
(STN 125586/0)
Sponsor: Portola Pharmaceuticals, Inc.

Background

The sponsor submitted:

- Original Biologics License Application
- Changes Being Effected (CBE) supplement
- Prior Approval Supplement (PAS)
- Major Amendment

Submission Date: December 18, 2015

PDUFA Action Date: August 17, 2016

Submission contains:

- Prescribing Information (PI)
- Patient Prescribing Information (PPI)
- Container and/or package labels
- Instructions For Use (IFU)

This review is for the original BLA submission of ANDEXXA (Coagulation Factor Xa (Recombinant), Inactivated) for the proposed indication of reversing the anticoagulant effect of direct or indirect factor Xa inhibitors in patients experiencing a serious uncontrolled bleeding event (b) (4) [REDACTED]. On December 18, 2015, Portola submitted this BLA for ANDEXXA, which would

undergo the accelerated approval regulatory pathway. During the mid-cycle review period, the clinical reviewer and CMC reviewers expressed concerns regarding the company's data. The submission contained data considered insufficient to support the proposed indication. On July 8, 2016, Portola submitted revised draft labeling. During July 11-18, 2016, the firm submitted some draft preapproval promotional materials for advisory comment. The firm acknowledged that they still have some more promotional materials under development. Because there are insufficient data to support the labeling revisions at this time, APLB will defer further comments on the proposed draft labeling, including the promotional materials.

If you have any questions regarding this review please contact Kristine T. Khuc, Pharm.D., Consumer Safety Officer at 240-402-8982.