

**Department of Health and Human Services  
Public Health Service  
Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Surveillance and Epidemiology**

**Pediatric Postmarketing Pharmacovigilance and Drug Utilization Review**

**Date:** May 16, 2017

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**Product Name(s):** Keppra (Levetiracetam)

**Pediatric Labeling Approval Date:** August 1, 2014

**Application Type/Number:**

|            |   |
|------------|---|
| NDA-021035 | Keppra oral tablets                       |
| NDA-021505 | Keppra oral solution                      |
| NDA-021872 | Keppra injection for intravenous use      |
| NDA-022285 | Keppra extended-release (XR) oral tablets |

**Applicant/Sponsor:** UBC Inc.

**OSE RCM #:** 2016-2894

**\*\*This document contains proprietary drug use data obtained by FDA under contract. The drug use data/information cannot be released to the public/non-FDA personnel without contractor approval obtained through the FDA/CDER Office of Surveillance and Epidemiology.\*\***

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## EXECUTIVE SUMMARY

In accordance with the Food and Drug Administration Amendments Act (FDAAA) Best Pharmaceuticals for Children Act (BPCA) and Pediatric Research Equity Act (PREA), the Office of Surveillance and Epidemiology (OSE) evaluated postmarketing adverse event reports with a serious outcome and drug utilization data for levetiracetam in pediatric patients.

Levetiracetam extended-release oral tablets were first approved in 2008, and the approved pediatric labeling is for adjunctive treatment of partial onset seizures in patients  $\geq 12$  years of age. Levetiracetam injection for intravenous use was first approved in 2006, and the approved pediatric labeling is for adjunctive treatment of partial onset seizures in patients  $\geq 1$  month of age, myoclonic seizures in patients  $\geq 12$  years of age, and primary generalized tonic-clonic seizures in patients  $\geq 6$  years of age.

In the outpatient setting, pediatric patients aged 0-16 years accounted for approximately 16% (25,280 patients) of total patients who received prescriptions for levetiracetam XR dispensed from U.S. outpatient retail pharmacies from August 2014 through December 2016. Of these pediatric patients, approximately half of the patients were ages 12-16 years. There was a small proportion of patients one year old and younger who received levetiracetam XR prescriptions; however, this use cannot be validated due to the lack of access to patient medical records. In the hospital setting, pediatric patients ages 0-16 years accounted for approximately 8% (79,000 patients) of total patients with a hospital discharge billing for injectable levetiracetam. Use of injectable levetiracetam was seen across all pediatric age groups. Please note that patient counts provided are not mutually exclusive as the patients are likely treated both inpatient and outpatient; therefore summing of patient populations will result in double counting of patients.

We identified 276 FAERS cases with levetiracetam in the U.S. pediatric population reporting a serious outcome, including 22 deaths. All 22 death cases reported alternative etiologies for the death or did not provide adequate information for causality assessment. Our evaluation of postmarketing adverse event reports does not suggest any new or unexpected pediatric safety concerns with levetiracetam at this time. The majority of reported drug event combinations were consistent with the known risks described in the labeling, or were disease-related or indication-related. We identified five cases related to the unlabeled events of cardiovascular adverse events, rhabdomyolysis, or encephalopathy with a possible causal association. No clear patterns or trends suggested a new safety signal associated with the other reported serious unlabeled adverse events in the pediatric case series.

We will continue routine pharmacovigilance for all pediatric adverse events associated with the use of levetiracetam, including cardiovascular adverse events, rhabdomyolysis, and encephalopathy as adverse events of interest in all patient populations.

# 1 INTRODUCTION

## 1.1 PEDIATRIC REGULATORY HISTORY

Keppra (levetiracetam) is available in the following dosage forms:

- NDA-021035: oral tablets (250 mg, 500 mg, 750 mg, or 1000 mg)
- NDA-021505: oral solution (100 mg/ml)
- NDA-021872: injection for intravenous use (500 mg/5 ml)
- NDA-022285: extended-release (XR) oral tablets (500 mg, 750 mg)

Table 1 summarizes the U.S. approval history of Keppra (levetiracetam).

| Date       | Product Formulation * |         |         |        | Approved Indication(s)†   |
|------------|-----------------------|---------|---------|--------|---|
|            | PO tab                | PO soln | IV soln | XR tab |   |
| 11/30/1999 | X                     |         |         |        | • Adjunctive treatment of POS in patients ≥16 years of age  |
| 7/15/2003  |                       | X       |         |        |   |
| 6/21/2005  | X                     | X       |         |        | • Adjunctive treatment of POS in patients ≥4 years of age   |
| 7/31/2006  |                       |         | X       |        | • Adjunctive treatment of POS in patients ≥16 years of age  |
| 8/15/2006  | X                     | X       |         |        | • Adjunctive treatment of POS in patients ≥4 years of age<br>• Adjunctive treatment of myoclonic seizures in patients ≥12 years of age  |
| 3/19/2007  | X                     | X       |         |        | • Adjunctive treatment of POS in patients ≥4 years of age<br>• Adjunctive treatment of myoclonic seizures in patients ≥12 years of age<br>• Adjunctive treatment of PGTCS in patients ≥6 years of age   |
| 9/12/2007  |                       |         | X       |        | • Adjunctive treatment of POS in patients ≥16 years of age<br>• Adjunctive treatment of myoclonic seizures in patients ≥16 years of age   |
| 5/16/2008  |                       |         | X       |        | • Adjunctive treatment of POS in patients ≥16 years of age<br>• Adjunctive treatment of myoclonic seizures in patients ≥16 years of age<br>• Adjunctive treatment of PGTCS in patients ≥16 years of age |
| 9/12/2008  |                       |         |         | X      | • Adjunctive treatment of POS in patients ≥16 years of age  |
| 12/16/2011 | X                     | X       |         |        | • Adjunctive treatment of POS in patients ≥1 month of age<br>• Adjunctive treatment of myoclonic seizures in patients ≥12 years of age<br>• Adjunctive treatment of PGTCS in patients ≥6 years of age   |
| 8/1/2014   |                       |         |         | X      | • Adjunctive treatment of POS in patients ≥12 years of age  |
| 10/30/2014 |                       |         | X       |        | • Adjunctive treatment of POS in patients ≥1 month of age<br>• Adjunctive treatment of myoclonic seizures in patients ≥12 years of age<br>• Adjunctive treatment of PGTCS in patients ≥6 years of age   |

\* PO = oral, soln = solution, IV = intravenous, XR = extended-release  
 † POS = partial onset seizures; PGTCS = primary generalized tonic-clonic seizures

OSE previously evaluated postmarketing adverse event reports with a serious outcome and drug utilization data for levetiracetam in pediatric patients. This evaluation was triggered by the pediatric labeling changes on December 16, 2011, which extended the pediatric ages for the approved indications.<sup>1</sup> FDA presented this evaluation to the Pediatric Advisory Committee (PAC) on April 21, 2014. This evaluation did not identify any new safety concerns, and the PAC recommended return to standard, ongoing monitoring for adverse events with levetiracetam.

### ***1.1.1 Pediatric Labeling Changes for Levetiracetam XR Oral Tablet***

Levetiracetam XR oral tablets were first approved on September 12, 2008. The latest pediatric labeling changes occurred on August 1, 2014. FDA approved extending the indication for adjunctive treatment of POS from 16 years of age to  $\geq 12$  years of age.

Safety and effectiveness in pediatric patients  $\geq 12$  years of age has been established based on pharmacokinetic (PK) data in adults and adolescents using levetiracetam XR and efficacy and safety data in controlled pediatric studies using immediate-release levetiracetam.

No new safety signals were observed in the PK studies for the latest pediatric labeling changes. Adverse events observed in these PK studies included somnolence, abnormal behavior, and a transient elevation in diastolic blood pressure.<sup>2</sup>

### ***1.1.2 Pediatric Labeling Changes for Levetiracetam Injection for Intravenous Use***

Levetiracetam injection for intravenous use was first approved on July 31, 2006. The latest pediatric labeling changes occurred on October 30, 2014. FDA approved extending the following indications:

- Adjunctive treatment of POS from  $\geq 16$  years of age to  $\geq 1$  month of age
- Adjunctive treatment of myoclonic seizures from  $\geq 16$  years of age to  $\geq 12$  years of age
- Adjunctive treatment of PGTCS from  $\geq 16$  years of age to  $\geq 6$  years of age

Safety and effectiveness in pediatric patients has been established based on PK data in adults and children using parenteral levetiracetam and efficacy and safety data in controlled pediatric studies using oral levetiracetam.

No new safety signals were observed in the PK studies for the latest pediatric labeling changes. Adverse events observed in these PK studies included convulsion, somnolence, dizziness, nausea, vomiting, hypotension, and skin reactions.<sup>3</sup>

## **1.2 HIGHLIGHTS OF LABELED SAFETY ISSUES**

The current approved labels for levetiracetam (April 24, 2017) provide the following information excerpted from pertinent sections:<sup>4-6</sup>

## WARNINGS AND PRECAUTIONS

### **Levetiracetam oral tablet, oral solution, XR oral tablet, and injection for IV use:**

- **Behavioral Abnormalities and Psychotic Symptoms:** KEPPRA may cause behavioral abnormalities and psychotic symptoms. Patients treated with KEPPRA should be monitored for psychiatric signs and symptoms.
- **Somnolence and Fatigue:** KEPPRA may cause somnolence and fatigue. Patients should be monitored for these signs and symptoms and advised not to drive or operate machinery until they have gained sufficient experience on KEPPRA to gauge whether it adversely affects their ability to drive or operate machinery.
- **Anaphylaxis and Angioedema:** KEPPRA can cause anaphylaxis or angioedema after the first dose or at any time during treatment.
- **Serious Dermatological Reactions:** Serious dermatological reactions, including Stevens-Johnson syndrome (SJS) and toxic epidermal necrolysis (TEN), have been reported in both pediatric and adult patients treated with KEPPRA.
- **Coordination Difficulties:** KEPPRA may cause coordination difficulties.
- **Withdrawal Seizures:** Antiepileptic drugs, including KEPPRA, should be withdrawn gradually to minimize the potential of increased seizure frequency.
- **Hematologic Abnormalities:** KEPPRA can cause hematologic abnormalities. Hematologic abnormalities occurred in clinical trials and included decreases in red blood cell (RBC) counts, hemoglobin, and hematocrit, and increases in eosinophil counts. Decreased white blood cell (WBC) and neutrophil counts also occurred in clinical trials. Cases of agranulocytosis have been reported in the postmarketing setting.
- **Seizure Control During Pregnancy:** Physiological changes may gradually decrease plasma levels of levetiracetam throughout pregnancy. This decrease is more pronounced during the third trimester. It is recommended that patients be monitored carefully during pregnancy. Close monitoring should continue through the postpartum period especially if the dose was changed during pregnancy.

### **Levetiracetam oral tablet, oral solution, and XR oral tablet only:**

- **Suicidal Behavior and Ideation:** Antiepileptic drugs (AEDs), including KEPPRA, 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.

### **Levetiracetam oral tablet, oral solution, and injection for IV use only:**

- **Increase in Blood Pressure:** In a randomized, placebo-controlled study in patients 1 month to <4 years of age, a significantly higher risk of increased diastolic blood pressure was observed in the KEPPRA-treated patients (17%), compared to the placebo-treated patients (2%). There was no overall difference in mean diastolic blood pressure between the treatment groups. The disparity between the KEPPRA and placebo treatment groups was not observed in the studies of older children or in adults.

## ADVERSE REACTIONS

### **Levetiracetam oral tablet, oral solution, and injection for IV use only:**

Most common adverse reactions (incidence  $\geq 5\%$  more than placebo) include:

- Adult patients: somnolence, asthenia, infection and dizziness
- Pediatric patients: fatigue, aggression, nasal congestion, decreased appetite, and irritability

### **Levetiracetam XR oral tablet only:**

Most common adverse reactions (incidence  $\geq 5\%$  more than placebo) include: somnolence and irritability

## OVERDOSAGE

### **Levetiracetam oral tablet, oral solution, XR oral tablet, and injection for IV use:**

#### *Signs, Symptoms and Laboratory Findings of Acute Overdosage in Humans*

The highest known dose of KEPPRA received in the clinical development program was 6000 mg/day. Other than drowsiness, there were no adverse reactions in the few known cases of overdose in clinical trials. Cases of somnolence, agitation, aggression, depressed level of consciousness, respiratory depression and coma were observed with KEPPRA overdoses in postmarketing use.

#### *Management of Overdose*

There is no specific antidote for overdose with KEPPRA. If indicated, elimination of unabsorbed drug should be attempted by emesis or gastric lavage; usual precautions should be observed to maintain airway. General supportive care of the patient is indicated including monitoring of vital signs and observation of the patient's clinical status. A Certified Poison Control Center should be contacted for up to date information on the management of overdose with KEPPRA.

#### *Hemodialysis*

Standard hemodialysis procedures result in significant clearance of levetiracetam (approximately 50% in 4 hours) and should be considered in cases of overdose. Although hemodialysis has not been performed in the few known cases of overdose, it may be indicated by the patient's clinical state or in patients with significant renal impairment.

## 2 DRUG UTILIZATION DATA

### 2.1 METHODS AND MATERIALS

We used proprietary drug utilization databases available to FDA to conduct this analysis. Detailed database descriptions are provided in Appendix A.

### 2.2 DATA SOURCES USED

*The QuintilesIMS, National Sales Perspectives*<sup>TM</sup> was used to determine the settings of care where levetiracetam products were distributed based on the volume of drug products sold from the manufacturers to various U.S. distribution channels in 2016.

*The QuintilesIMS, Total Patient Tracker*<sup>TM</sup> *database* was used to obtain the nationally estimated number of patients who received a dispensed prescription for levetiracetam from U.S. outpatient retail pharmacies, stratified by formulation and by patient age (<1 year, 1 year, 2-5, 6-11, 12-16, 17 years and older) from August 1, 2014, through December 31, 2016, aggregated.

*The QuintilesIMS Hospital Visit Analyzer database* was used to determine the nationally estimated number of patients with an inpatient and outpatient hospital discharge billing for levetiracetam, stratified by formulation (oral includes IR/XR tablets and solution) and by patient age (<1 year, 1 year, 2-5, 6-11, 12-16, 17 years and older) from non-federal U.S. hospitals from August 1, 2014, through December 31, 2016, aggregated. Of note, given the limitations of this database, we are not able to provide breakdown of oral formulations, immediate-release, or extended-release.

### 2.3 RESULTS

#### 2.3.1 Settings of Care

According to sales distribution data for 2016, 63% of levetiracetam bottles and vials were sold to U.S. non-retail settings of care (primarily non-federal hospitals), 33% to outpatient retail pharmacies, and 4% to mail-order/specialty pharmacy settings. Of the total market share, Oral levetiracetam, which includes immediate-release (IR) and extended-release (XR) tablets as well as oral solution, accounted for 62%, where approximately half were distributed to U.S. outpatient retail pharmacies. Injectable products accounted for 38% of the total market share, of which over 99% were distributed to non-retail (primarily non-federal hospitals) settings of care. Therefore, we focused on both hospital (inpatient and outpatient) and outpatient retail settings of care to examine the drug utilization trends for this review. Mail-order/specialty pharmacy and clinic data were not included in this review.

### 2.3.2 Outpatient Pharmacy Patient Level Data

**Table 2. Nationally Estimated Number of Patients with Dispensed Prescriptions for Levetiracetam\*, Stratified by Formulation and by Patient Age, from U.S. Outpatient Retail Pharmacies, August 1, 2014 - December 31, 2016**

|  | <b>August 1, 2014 - December 31, 2016</b> |                 |
|--|---|-----------------|
|  | <b>Patients (N)</b>                       | <b>Share %</b>  |
| <b>Levetiracetam Total Patients</b>                            | <b>2,378,146</b>                          | <b>100.0%</b>   |
| <b>0 - 16 years total</b>                                      | <b>363,968</b>                            | <b>15.3%</b>    |
| <b>17 years and older</b>                                      | <b>2,013,595</b>                          | <b>84.7%</b>    |
| <b>Levetiracetam Immediate Release (solution/tablet) Oral*</b> | <b>2,282,064</b>                          | <b>96.0%</b>    |
| <b>0 - 16 years</b>  | <b>346,507</b>                            | <b>15.2%</b>    |
| < 1 year   | 27,932                                    | 8.1%            |
| 1 year   | 31,499                                    | 9.1%            |
| 2 - 5 years  | 102,201                                   | 29.5%           |
| 6 - 11 years   | 133,260                                   | 38.5%           |
| 12 - 16 years  | 108,789                                   | 31.4%           |
| <b>17 years and older</b>                                      | <b>1,933,379</b>                          | <b>84.7%</b>    |
| <b>Age Unknown</b>   | <b>36,414</b>                             | <b>1.6%</b>     |
| <b>Levetiracetam Extended Release Oral</b>                     | <b>154,983</b>                            | <b>6.5%</b>     |
| <b>0 - 16 years</b>  | <b>25,279</b>                             | <b>16.3%</b>    |
| < 1 year   | 547                                       | 2.2%            |
| 1 year   | 850                                       | 3.4%            |
| 2 - 5 years  | 4,933                                     | 19.5%           |
| 6-11 years   | 7,772                                     | 30.7%           |
| 12 - 16 years  | 13,094                                    | 51.8%           |
| <b>17 years and older</b>                                      | <b>131,096</b>                            | <b>84.6%</b>    |
| <b>Age Unknown</b>   | <b>2,651</b>                              | <b>1.7%</b>     |
| <b>Levetiracetam Injection</b>                                 | <b>634</b>                                | <b>&lt;0.1%</b> |
| <b>0 - 16 years</b>  | <b>97</b>                                 | <b>15.3%</b>    |
| <b>17 years and older</b>                                      | <b>531</b>                                | <b>83.8%</b>    |
| <b>Age Unknown</b>   | <b>10</b>                                 | <b>1.6%</b>     |

Source: QuintilesIMS, Total Patient Tracker™. August 2014 - December 2016. Extracted April 2017.

File: TPT 2017-2894 levetiracetam BPCA April 2017.xls

*Note: subtotals may not sum exactly because of patients aging during the study period and may be counted more than once in the individual age categories. Patients may have also received more than one drug product/formulation during the study period. Therefore, summing across patient age bands or drug products is not advisable and will result in overestimates of patient counts.*

*\*Immediate release includes oral solution, tablet, and disintegrating tablet*

### 2.3.3 Inpatient and Outpatient Hospital Patient Level Data

**Table 3. Nationally Estimated Number of Patients With an Inpatient or Outpatient Hospital Discharge Billing for Levetiracetam Stratified by Formulation and by Patient Age, from U.S. Non-Federal Hospitals, August 1, 2014 - December 31, 2016, Aggregated**

|  | August 1, 2014 - December 31, 2016 |               |
|--|------------------------------------|---------------|
|  | Patients (N)                       | Share %       |
| <b>Levetiracetam Total Patients</b>          | <b>2,413,986</b>                   | <b>100.0%</b> |
| <b>0 - 16 years total</b>                    | <b>179,967</b>                     | <b>7.5%</b>   |
| 17 years and older                           | 2,235,533                          | 92.6%         |
| <b>Levetiracetam Oral*</b>                   | <b>1,619,653</b>                   | <b>67.1%</b>  |
| <b>0 - 16 years</b>                          | <b>99,564</b>                      | <b>6.1%</b>   |
| < 1 year                                     | 12,965                             | 13.0%         |
| 1 year                                       | 8,735                              | 8.8%          |
| 2 - 5 years                                  | 25,357                             | 25.5%         |
| 6 - 11 years                                 | 27,220                             | 27.3%         |
| 12 - 16 years                                | 28,374                             | 28.5%         |
| 17 years and older                           | 1,520,818                          | 93.9%         |
| <b>Levetiracetam Injection</b>               | <b>1,009,962</b>                   | <b>41.84%</b> |
| <b>0 - 16 years</b>                          | <b>79,011</b>                      | <b>7.8%</b>   |
| < 1 year                                     | 13,650                             | 17.3%         |
| 1 year                                       | 8,148                              | 10.3%         |
| 2 - 5 years                                  | 20,438                             | 25.9%         |
| 6-11 years                                   | 19,394                             | 24.5%         |
| 12 - 16 years                                | 18,615                             | 23.6%         |
| 17 years and older                           | 931,246                            | 92.2%         |
| <b>Levetiracetam Formulation Unspecified</b> | <b>698,604</b>                     | <b>28.94%</b> |
| <b>0 - 16 years</b>                          | <b>63,321</b>                      | <b>9.1%</b>   |
| 17 years and older                           | 635,747                            | 91.0%         |

Source: QuintilesIMS, Hospital Visit Analyzer (HVA). Aug 2014 – Dec 2016. Extracted April-2017.  
File: HVA 2016-2894 Levetiracetam BPCA April-2017.xlsx

*Note: subtotals may not sum exactly because of patients aging during the study period, and may be counted more than once in the individual age categories. Patients may have also received more than one drug product/formulation during the study period. Therefore, summing across patient age bands or drug product/formulation is not advisable and will result in overestimates of patient counts.*

*\*Oral levetiracetam includes immediate release (tablet, disintegrating tablets, oral solution) and extended release tablet.*

### 3 POSTMARKET ADVERSE EVENT REPORTS

#### 3.1 METHODS AND MATERIALS

##### 3.1.1 FDA Adverse Event Reporting System (FAERS) Search Strategy

DPV searched the FAERS database with the strategy described in Table 4. See Appendix B for a description of the FAERS database.

|                       |   |
|-----------------------|---|
| Date of Search        | January 3, 2017   |
| Time Period of Search | May 31, 2013* - December 31, 2016   |
| Search Type           | FBIS profile (or product manufacturer reporting summary) query<br>FBIS quick query                              |
| Product Name(s)       | Product name: Keppra, Keppra XR<br>Product active ingredient: levetiracetam<br>Active ingredient: levetiracetam |
| Search Parameters     | All ages, outcomes, worldwide, MedDRA PTs (v19.1)   |

\* May 31, 2013 is the date of FAERS data cutoff from the previous Pediatric Postmarketing Pharmacovigilance and Drug Utilization Review presented at the April 2014 Pediatric Advisory Committee. U.S. approval dates of last pediatric labeling were August 1, 2014 for Keppra XR tablets and October 30, 2014 for Keppra IV solution.

We identified all U.S. pediatric FAERS reports of levetiracetam with a serious outcome received from May 31, 2013, to December 31, 2016. Serious outcomes per regulatory definition (CFR 314.80) include death, life-threatening, hospitalization (initial or prolonged), disability, congenital anomaly, and other serious important medical events. We screened all reported drug event combinations (DECs) during this timeframe for serious unlabeled events with levetiracetam. A DEC is a drug and adverse event combination reported in at least one case in the database. Cases may have more than one reported DEC.

We also reviewed all designated medical events (DMEs) in U.S. pediatric FAERS reports received from May 31, 2013, to December 31, 2016, to capture adverse events that are considered rare, serious, and associated with a high drug-attributable risk. OSE created the DME list for working purposes; it has no regulatory significance. See Appendix C for a list of OSE's DMEs.

Furthermore, we used the Empirica Signal database to perform data mining and disproportionality analysis on all reported DECs for levetiracetam since product approval for all pediatric and adult FAERS reports. Data mining and disproportionality analysis identifies patterns of associations or unexpected occurrences (i.e., "potential signals") in large databases (e.g., FAERS). Data mining complements our traditional signal detection approaches, as described above, in routine assessment of spontaneous adverse event report data. Data mining scores do not, by themselves, demonstrate causal associations; rather, they serve as a signal for further investigation. See Appendix D for a description of data mining of FAERS using Empirica Signal.

This review focuses on deaths and serious unlabeled events of interest, identified in our data analysis described above, in the U.S. pediatric population from May 31, 2013, to December 31, 2016. We did not identify any additional events of interest with levetiracetam in the U.S. pediatric population in the other timeframes analyzed for this review.

## 3.2 RESULTS

### 3.2.1 Total Number of FAERS Reports by Age

Our FAERS search retrieved 13,049 total reports for levetiracetam in all ages and countries from May 31, 2013, to December 31, 2016. Table 5 summarizes the total number of FAERS reports stratified by age and outcome.

|                                      | All reports (U.S.) | Serious <sup>†</sup> (U.S.)    | Death (U.S.) |
|--------------------------------------|--------------------|--------------------------------|--------------|
| <b>Adults (≥ 17 years)</b>           | 6,194 (2,497)      | 5,397 (1,828)                  | 629 (269)    |
| <b>Pediatrics (0 - &lt;17 years)</b> | 1,505 (691)        | <b>1,246 (470)<sup>‡</sup></b> | 86 (28)      |

\* May include duplicates and transplacental exposures, and have not been assessed for causality.

† For the purposes of this review, the following outcomes qualify as serious: death, life-threatening, hospitalization (initial or prolonged), disability, congenital anomaly, required intervention, and other serious important medical events.

### 3.2.2 Selection of Serious Pediatric Cases in FAERS

We identified 470 U.S. pediatric reports with levetiracetam reporting a serious outcome from May 31, 2013, to December 31, 2016 (see Table 5). Our pediatric case series included 276 cases, including 22 deaths, after excluding duplicate reports (n=173), transplacental exposure reports (n=19), and miscoded age reports (n=2).

### 3.2.3 Characteristics of Pediatric Case Series

Appendix E lists all the FAERS case numbers, FAERS version numbers and Manufacturer Control Numbers for the Pediatric Case Series.

Table 6 summarizes the 276 FAERS cases in U.S. pediatric patients with levetiracetam reporting a serious outcome received by FDA from May 31, 2013, to December 31, 2016.

**Table 6. Characteristics of U.S. Pediatric Case Series With Levetiracetam, Received by FDA From May 31, 2013, to December 31, 2016 (N=276)**

|                              |  |     |
|------------------------------|--|-----|
| Age                          | 0 - < 1 month                              | 13  |
|                              | 1 month - <2 years                         | 36  |
|                              | 2- < 6 years                               | 84  |
|                              | 6- <12 years                               | 78  |
|                              | 12- < 17 years                             | 63  |
|                              | Unknown pediatric                          | 2   |
| Sex                          | Male                                       | 129 |
|                              | Female                                     | 134 |
|                              | Unknown                                    | 13  |
| Report Year                  | 2013 (36), 2014 (62), 2015 (91), 2016 (87) |     |
| Reported Reason for Use*     | Seizures/epilepsy                          | 201 |
|                              | Unknown                                    | 16  |
|                              | Neonatal seizures                          | 12  |
|                              | Partial seizures                           | 10  |
|                              | Status epilepticus                         | 9   |
|                              | Generalized seizures                       | 8   |
|                              | Seizure prophylaxis                        | 6   |
|                              | Infantile spasms                           | 5   |
|                              | Absence seizures                           | 3   |
|                              | Lennox-Gastaut syndrome                    | 2   |
|                              | Complex febrile seizures                   | 1   |
|                              | Dravet syndrome                            | 1   |
|                              | Juvenile myoclonic epilepsy                | 1   |
|                              | “Shaking/spacing out”                      | 1   |
| Serious Outcome <sup>†</sup> | Death                                      | 22  |
|                              | Life-threatening                           | 20  |
|                              | Hospitalized                               | 85  |
|                              | Disability                                 | 3   |
|                              | Congenital anomaly                         | 0   |
|                              | Required Intervention                      | 0   |
|                              | Other serious                              | 200 |

\* Seizures/epilepsy includes: seizures, convulsions, and epilepsy. Partial seizures includes: partial seizures, complex partial seizures, frontal lobe seizures, temporal lobe seizures, and benign rolandic epilepsy. Generalized seizures includes: generalized tonic-clonic seizures and idiopathic generalized epilepsy.

<sup>†</sup> For the purposes of this review, the following outcomes qualify as serious: death, life-threatening, hospitalization (initial or prolonged), disability, congenital anomaly, required intervention, and other serious important medical events. Reports may have more than one outcome.

### 3.3 SUMMARY OF FATAL PEDIATRIC ADVERSE EVENT CASES (N=22)

We identified 22 cases with levetiracetam reporting death as an outcome in the pediatric population. All 22 cases did not provide evidence of a causal association with levetiracetam. All 22 cases reported alternative etiologies for the death or did not provide adequate information for causality assessment. Most cases (18 of 22) reported death secondary to seizure, sudden unexpected death in epilepsy (SUDEP), or complications from hypoxic ischemic encephalopathy. The remaining four cases reported death secondary to respiratory failure or meningoencephalitis. More than half of the cases (12 of 22) also reported use of other concomitant antiepileptic drugs (AEDs). The cases are described below.

#### 3.3.1 *Seizure, SUDEP, or Complications from Hypoxic Ischemic Encephalopathy (n=18)*

- FAERS #10930623v1: a 3-year-old male died secondary to seizure. The patient had received levetiracetam with several concomitant AEDs in the past, and the reporter inquired about the use of medicinal cannabis sativa because the AEDs were ineffective.
- FAERS #9604661v1, 9554651v2: a literature article<sup>7</sup> reported two pediatric patients (5-month-old female and 11-month-old male) died while receiving levetiracetam with several concomitant AEDs and therapeutic hypothermia for refractory status epilepticus. Both patients had a poor prognosis and were transitioned to comfort care.
- FAERS #10280172v1, 10280183v1: a literature article<sup>8</sup> reported two pediatric patients of unknown age (< 18 years old) died while receiving intravenous levetiracetam for seizures. This retrospective study reported “two patients died because of continued seizure activity on three anticonvulsants” and did not provide any patient specific details for these two cases.
- FAERS #9587733v3: an 8-year-old male died secondary to SUDEP. The patient had a history of intractable convulsive epilepsy and received levetiracetam with clobazam.
- FAERS #12536849v1: a literature article<sup>9</sup> reported an 11-year-old male died secondary to SUDEP. The patient had a history of Lennox-Gastaut syndrome and received levetiracetam with several concomitant AEDs.
- FAERS #12241983v1: a literature article<sup>10</sup> reported a 12-year-old male died secondary to SUDEP. The patient had a history of Lennox-Gastaut syndrome, infantile spasms, and meningoencephalitis and received levetiracetam with several concomitant AEDs.
- FAERS #11610875v1: an 8-day-old female died while receiving levetiracetam with several concomitant AEDs for seizures in neonatal hypoxic ischemic encephalopathy. The patient had a poor prognosis and was transitioned to comfort care.
- FAERS #10957787v1: a literature article<sup>11</sup> reported a 9-month-old female died secondary to complications of influenza A-associated acute necrotizing encephalopathy and hypoxic ischemic encephalopathy. The patient presented with symptoms of pneumonia and developed seizures and subsequently received levetiracetam. The patient was diagnosed with influenza A-associated acute necrotizing encephalopathy and hypoxic ischemic encephalopathy. The patient’s status progressively worsened and she died secondary to complications, including cardiac arrest with pulseless electrical activity, disseminated intravascular coagulation, and gastrointestinal and pulmonary hemorrhages.

- FAERS #13025491v1, 13025492v1, 13025493v1, 13025494v1, 13025499v1, 13025500v1, 13025541v1, 13025542v1: a literature article<sup>12</sup> reported eight neonates who died while receiving levetiracetam for seizures in neonatal hypoxic ischemic encephalopathy. This retrospective study reported 8 of 32 neonates treated with levetiracetam died and did not provide any patient specific details for these 8 cases.

### 3.3.2 *Respiratory Failure or Meningoencephalitis (n=4)*

- FAERS #11992572v1: a literature article<sup>13</sup> reported a 7-month-old male infant died secondary to respiratory failure after developing cerebral atrophy and subdural hematoma. The patient had a medical history of Pierson’s syndrome and developed a catheter-associated thrombus and was placed on enoxaparin. The patient later developed cerebral atrophy, subdural hematoma, seizures, and status epilepticus and subsequently received levetiracetam with several concomitant AEDs, and transitioned to comfort care.
- FAERS #11102056v1: a literature article<sup>14</sup> reported a 32-month-old female died secondary to respiratory failure and disease progression from mutations in the polymerase gamma (POLG) gene of mitochondria. The patient developed seizures and status epilepticus and received levetiracetam with several concomitant AEDs.
- FAERS #11138725v1: a literature article<sup>15</sup> reported a 9-week-old male died secondary to respiratory illness while receiving levetiracetam with several concomitant AEDs and ketogenic diet for refractory status epilepticus.
- FAERS #10785131v1: a literature article<sup>16</sup> reported a 4-year-old male died secondary to meningoencephalitis after exposure to *Naegleria fowleri* in tap water from a treated public drinking water system. The patient was hospitalized for meningitis symptoms and was initiated on levetiracetam for “repeat staring spells, which were suggestive of seizures.” The patient’s status progressively worsened and died secondary to the meningoencephalitis.

## 3.4 SUMMARY OF ALL PEDIATRIC SERIOUS ADVERSE EVENT CASES (N=276)

We identified 276 FAERS cases with levetiracetam in the U.S. pediatric population reporting a serious outcome including the 22 death cases described above, with 351 DEC. The majority of reported DEC were consistent with the known risks described in the labeling, and no apparent increased severity was observed in these cases. These adverse events are adequately described in the labeling, including several in Warnings and Precautions. Labeled DEC reported in  $\geq 5$  cases included:

- behavioral abnormalities and psychotic symptoms
- somnolence and fatigue
- gastrointestinal adverse events
- dermatological and allergic reactions
- movement disorders
- sleep disorders
- coordination difficulties or dizziness
- hematologic abnormalities
- suicidal behavior and ideation

Several unlabeled DEC's were disease-related or indication-related. Unlabeled DEC's related to the patient's underlying disease or indication for use reported in  $\geq 5$  cases included:

- seizures
- drug ineffective, condition aggravated
- product substitution issue, product use issue, product quality issue
- off label use, drug administered to patient of inappropriate age

The cases reporting ineffective drug and product issues primarily reported seizures with the use of levetiracetam. Several of these cases reported ineffective seizure control with the use of generic levetiracetam, and requested the use of brand Keppra for insurance coverage. We did not identify a trend with any specific levetiracetam products, lot numbers, or manufacturers associated with these DEC's. Several cases also reported refractory seizures requiring the use of concomitant AEDs that were also ineffective for seizure control.

We identified four events of interest in the pediatric population with all levetiracetam formulations that are serious unlabeled DEC's. These events include cardiovascular adverse events, rhabdomyolysis, encephalopathy, and neurophysiologic abnormalities. Our review focuses on these events of interest with levetiracetam in the U.S. pediatric population. No clear patterns or trends suggested a new safety signal associated with the other reported serious unlabeled adverse events in the pediatric case series.

We did not identify any additional events of interest specific to the extended-release or intravenous formulations of levetiracetam. Most events were consistent with the known risks described in the labeling, or were disease or indication related.

We identified 45 pediatric cases in unlabeled patient populations with levetiracetam reporting a serious outcome. We did not identify any additional events of interest specific to use of levetiracetam in these unlabeled patient populations. Most events were consistent with the known risks described in the labeling, or were disease or indication related. These 45 cases included:

- neonatal seizures (12)
- status epilepticus (9)
- seizure prophylaxis (6)
- infantile spasms (5)
- absence seizure (3)
- extended-release tablet in <12 years of age (3)
- generalized tonic-clonic seizures <6 years of age (2)
- Lennox-Gastaut Syndrome (2)
- Complex febrile seizures (1)
- Dravet syndrome (1)
- "shaking and spacing out" episodes (1)

### 3.4.1 Serious unlabeled DEC's

We identified seven cases reporting seven serious unlabeled DEC's of interest with levetiracetam in the pediatric population.

- Two cases (FAERS # 11549994v2, FAERS #10453143v4) reported cardiorespiratory failure or cardiac arrest after an intentional overdose of levetiracetam with other medications.
- One case (FAERS #10472342v1) reported hypotension after an unintentional overdose of levetiracetam.
- One case (FAERS #10884951v1) reported increased premature ventricular contractions (PVCs) in a neonate with pre-existing PVCs.
- One case (FAERS #13038769v1) reported rhabdomyolysis after receiving levetiracetam for tonic-clonic seizures.
- One case (FAERS #9494308v1) reported encephalopathy in a patient presenting with renal failure and metabolic acidosis on levetiracetam.
- One case (FAERS # 10772415v1) reported neurophysiologic abnormalities while receiving levetiracetam during craniotomy and tumor resection.

All seven cases reported evidence of a possible causal association with levetiracetam. However, many cases also reported other factors affecting the causality assessment. The cases are described below.

#### **CARDIOVASCULAR ADVERSE EVENTS (N=4)**

**FAERS # 11549994v2, MCN: US-TEVA-596583USA, 2015:** a literature article<sup>17</sup> reported a 16-year-old male developed lactic acidosis and cardiorespiratory failure after an intentional overdose of unknown amounts of multiple medications, including levetiracetam, metformin, and paroxetine. Medical history included depression. The patient presented unconscious with serum pH 7.13 [normal 7.35-7.45] and lactate 20.3 mmol/L [normal 0.5-2 mmol/L]. The patient received normal saline with sodium bicarbonate for lactic acidosis, was intubated for altered mental status, and received vasopressors for hypotension. On day 2, the patient's condition deteriorated and he developed cardiorespiratory failure and was placed on extracorporeal membrane oxygenation (ECMO) and hemodialysis. After 6 days of ECMO treatment, the patient was weaned from treatment and eventually had a full neurologic recovery.

***Reviewer comment:*** *this case provides evidence of a possible causal association of lactic acidosis and cardiorespiratory failure with levetiracetam overdose because of the plausible temporal relationship. However, the concomitant ingestion of metformin and paroxetine provide a more likely alternative etiology. Metformin has been associated with lactic acidosis with hypotension, respiratory depression, and bradyarrhythmias. Paroxetine has been associated with hypotension, ventricular dysrhythmias, and bradycardia.*

**FAERS #10453143v4, MCN: US-TEVA-508022USA, 2014:** a literature article<sup>18</sup> reported a 16-year-old female developed cardiac arrest after an intentional overdose of levetiracetam (unknown amount), lacosamide 4.5 g, and cyclobenzaprine 120 mg. Medical history included seizure disorder, depression, three prior suicide attempts, and medication non-compliance. The patient presented with pulseless ventricular tachycardia, received defibrillation, and converted to sinus tachycardia. The patient then developed tonic-clonic seizure and received diazepam. The patient's condition deteriorated and she developed respiratory depression requiring intubation, asystole requiring epinephrine and atropine with cardiopulmonary resuscitation, possible sodium channel blockade requiring sodium bicarbonate, and QRS widening. Urine screen was positive for opiates. Approximately 9 hours after initial presentation, the serum lacosamide level was elevated, and serum levetiracetam and cyclobenzaprine levels were within the therapeutic range. On day 2, the patient was extubated, and on day 5, she returned to her neurologic baseline without any deficits and was medically cleared.

***Reviewer comment:*** *this case provides evidence of a possible causal association of cardiac arrest with levetiracetam overdose because of the plausible temporal relationship. However, the concomitant ingestion of lacosamide and cyclobenzaprine provide a more likely alternative etiology because lacosamide has been associated with cardiac toxicity, and both of these medications are sodium channel blockers, which may affect cardiac conduction. In addition, the patient had a positive urine screen for opiates; opioid-induced respiratory arrest with hypoxia and acidosis may present similarly.*

**FAERS #10472342v1, MCN: 2014PRN00023, 2014:** a literature article<sup>19</sup> reported a 6-year-old male developed altered mental status and hypotension after an unintentional overdose of levetiracetam 10.5 g. Medical history included cerebral palsy, and concomitant medications were not reported. The patient's parent unintentionally administered 3.5 oz of levetiracetam 100 mg/ml oral solution via jejunostomy tube. Three hours post-ingestion, the patient presented with altered mental status, lethargy, and decreased gag reflex. The patient began to waken approximately 8 hours post-ingestion and mental status cleared throughout the day. The patient also developed hypotension with lowest measured blood pressure of 80/38 mmHg, managed with intravenous fluids. Approximately 24 hours post-ingestion, the patient was discharged home.

***Reviewer comment:*** *this case provides evidence of a possible causal association of hypotension with levetiracetam because of the plausible temporal relationship and positive dechallenge after levetiracetam ingestion. However, the case lacks information regarding concomitant medications.*

**FAERS #10884951v1, Direct report, 2015:** a 3-day-old female developed increased premature ventricular contractions (PVCs) while receiving intravenous levetiracetam in a study for new-onset neonatal seizures secondary to hypoglycemia. Concomitant medications included acyclovir, ampicillin, and cefotaxime. The patient developed PVCs

prior to the first levetiracetam infusion. PVCs were observed between the first and second loading dose of levetiracetam, and appeared to increase in frequency during the third levetiracetam infusion. During the levetiracetam maintenance infusion, the patient began having PVCs at a frequency of approximately 1 every 10 seconds. There were no clinical changes associated with the PVCs observed on the monitor. Levetiracetam was discontinued and changed to phenobarbital and the PVCs resolved. Additional findings included MRI of head showing venous infarct and normal electrolyte panel.

**Reviewer comment:** *this case provides evidence of a possible causal association of increased PVCs with levetiracetam because of the plausible temporal relationship and positive dechallenge after levetiracetam discontinuation. However, the patient had pre-existing PVCs prior to receiving the first dose of levetiracetam.*

### **RHABDOMYOLYSIS (N=1)**

**FAERS #13038769v1, MCN: US-ACCORD-046568, 2016:** a literature article<sup>20</sup> reported a 16-year-old male experienced rhabdomyolysis while receiving levetiracetam for new onset seizures. Medical history was unremarkable. The patient was hospitalized after developing two generalized tonic-clonic seizures. The first seizure occurring at school lasted for 2 minutes and the second seizure occurring in the emergency department lasted for 2.5 minutes. There was no reported fall or other trauma to the patient before or during the seizure. The patient was started on lorazepam and intravenous levetiracetam [unknown dose], and a normal saline bolus followed by maintenance fluid, and during hospitalization was started on levetiracetam 750 mg PO BID. Laboratory values on admission included serum bicarbonate 18 mmol/L [normal 21-29 mmol/L], normal serum electrolytes and creatinine, and negative urinalysis and drug screen. The following day, the patient developed back pain. Laboratory values included creatine kinase (CK) 565 U/L [normal 94-499 U/L], serum creatinine (SCr) 2.2 mg/dL [normal 0.5-1.2 mg/dL], and urinalysis positive for myoglobin and negative for protein, red blood cells, white blood cells, and bacteria. Potassium was omitted from the maintenance fluids and the rate was increased to 200 ml/h for hydration. The patient's back pain worsened and spread to other locations and required narcotics for pain control. On day 4, CK was 15,111 U/L and SCr "remained elevated with only mild fluctuations." On day 5, levetiracetam was discontinued and changed to divalproex sodium. By day 7, the patient's back pain completely resolved and SCr "normalized," and by day 10, CK "normalized." The patient was discharged on divalproex sodium and subsequent SCr and CK laboratories were normal.

**Reviewer comment:** *this case provides evidence of a possible causal association of rhabdomyolysis with levetiracetam because of the plausible temporal relationship and positive dechallenge after levetiracetam discontinuation. However, the two generalized tonic-clonic seizures one day prior to the event may provide an alternative etiology; tonic-clonic seizures may cause CK elevation and are a nontraumatic exertional cause of rhabdomyolysis.*

## **ENCEPHALOPATHY (N=1)**

**FAERS #9494308v1, MCN: LEVE20130007, 2013:** a literature article<sup>21</sup> reported a 12-year-old female developed encephalopathy with opsoclonus and triphasic waves on electroencephalogram (EEG) while receiving levetiracetam (unknown dose and duration) for epilepsy. Medical history included Chiari II malformation, repaired myelomeningocele, shunted hydrocephalus, and renal tubular acidosis. Concomitant medications were not reported. The patient was hospitalized for acute renal failure, metabolic acidosis, respiratory distress, and confusion. The patient received treatment for metabolic abnormalities and respiratory failure and had continued renal impairment. Within a few hours, the patient became increasingly somnolent, tremulous and encephalopathic. Neurologic findings included continuous, random conjugate jerky eye movements in all directions of gaze (opsoclonus) and chin quivering with occasional multifocal twitches of lower face muscles. EEG showed diffuse delta with continuous runs of periodic frontally predominant sharp waves consistent with triphasic waves. The patient was treated with lorazepam and fosphenytoin without resolution of symptoms. The plasma level of levetiracetam was 112 mcg/ml (reported therapeutic range 5–60 mcg/ml) and the dose of levetiracetam was adjusted for creatinine clearance. Continuous EEG over several days showed persistent triphasic waves. Other causes of metabolic encephalopathy were excluded. Levetiracetam was discontinued and the patient was started on valproate. Over the next 4-5 days abnormal eye movements resolved, and the patient gradually returned to baseline. Follow-up EEG showed resolution of triphasic waves.

***Reviewer comment:** this case provides evidence of a possible causal association of encephalopathy with levetiracetam because of the plausible temporal relationship and positive dechallenge after levetiracetam discontinuation. However, the case reports a supratherapeutic level of levetiracetam and other factors that may affect the causality assessment (acute renal failure, metabolic acidosis, respiratory distress) and lacks information regarding concomitant medications.*

## **NEUROPHYSIOLOGIC ABNORMALITIES (N=1)**

**FAERS # 10772415v1, MCN: US-ACCORD-028505, 2015:** a literature article<sup>22</sup> reported a 12-year-old female developed transient loss of transcranial electrical motor-evoked potential (tceMEP) signals while receiving intravenous levetiracetam 10 mg/kg for seizure prophylaxis during craniotomy and tumor resection. Medical history included fibrillary astrocytoma of the right temporal lobe and persistent seizures. Concomitant home medications included topiramate and clorazepate. Concomitant hospital medications included midazolam, propofol, remifentanyl, and inadvertent administration of succinylcholine. Baseline tceMEPs were normal at the start of the procedure. Ten minutes after initiating levetiracetam infusion (10 mg/kg over 30 minutes) during surgery, an abrupt, global decrease in tceMEP amplitude was observed, despite near-baseline vital signs, no other recent medication boluses, and minimal intracranial dissection (i.e., surgical trauma) at that point. The levetiracetam infusion was stopped,

and 3 minutes later, the tceMEP amplitude returned to baseline. TceMEPs remained stable throughout the remainder of surgery. After completion of surgery, the same levetiracetam infusion was resumed, and again a similar global decrease in tceMEP amplitude was observed, which resolved several minutes after cessation of the levetiracetam infusion. The patient experienced a full recovery after surgery.

**Reviewer comment:** *this case provides evidence of a probable causal association of transient loss of transcranial electrical motor-evoked potential (tceMEP) signals with levetiracetam because of the plausible temporal relationship, positive dechallenge after levetiracetam discontinuation, and positive rechallenge after levetiracetam restart. This phenomenon may have implications in surgical procedures using this electrophysiologic monitoring technique in combination with levetiracetam and concurrent general anesthetics (e.g., suboptimal resection of tumor due to misinterpretation of MEP changes).*

#### 4 DISCUSSION

In the outpatient setting, pediatric patients ages 0-16 years accounted for approximately 16% (25,280 patients) of total patients who received a prescription for levetiracetam XR from U.S. outpatient retail pharmacies from August 2014 through December 2016. Of these pediatric patients, approximately half were ages 12-16 years. There was a small proportion of patients one year old and younger who received levetiracetam XR prescriptions; however, this use could not be validated due to the lack of access to patient medical records. In the hospital setting, pediatric patients aged 0-16 years accounted for approximately 8% (79,000 patients) of total patients with a hospital discharge billing for injectable levetiracetam. However, these data may underrepresent pediatric utilization of levetiracetam in the hospital setting, as the data sources do not capture data from pediatric standalone hospitals. Use of injectable levetiracetam was seen across all pediatric age groups. Please note that patient counts provided are not mutually exclusive as the patients are likely treated both inpatient and outpatient and with multiple formulations over time; therefore summing of patient populations will result in double counting of patients.

Our review of the 276 FAERS cases with levetiracetam in the U.S. pediatric population demonstrated the majority of cases (263 of 276) were reported in pediatric patients  $\geq$  1 month of age. The most commonly reported reason for use was unspecified seizures/epilepsy (201), and all reported reasons for use were related to seizures and epilepsy.

Our review of the DEC's reported in the 276 FAERS cases with levetiracetam in the U.S. pediatric population, including unlabeled patient populations, did not identify any new safety concerns. The majority of reported DEC's were consistent with the known risks described in the labeling, and no apparent increased severity was observed in these cases. The majority of labeled DEC's were related to behavioral abnormalities and psychotic symptoms, somnolence and fatigue, gastrointestinal adverse events, dermatological and allergic reactions, movement disorders, sleep disorders, coordination difficulties or dizziness, hematologic abnormalities, or suicidal behavior and ideation. These adverse events are adequately described in the labeling, including several in Warnings and Precautions.

Several unlabeled DECAs were disease-related or indication-related, including seizures, drug ineffective, condition aggravated, product substitution issue, product use issue, product quality issue, off label use, and drug administered to patient of inappropriate age. The cases reporting ineffective drug and product issues primarily reported seizures with the use of levetiracetam. Seizures are expected in this patient population with epilepsy, therefore the events of seizure reported in this pediatric case series are consistent with treatment of the disease state. We did not identify a trend with any specific levetiracetam products, lot numbers, or manufacturers associated with these DECAs.

We identified 22 FAERS cases reporting death as an outcome with levetiracetam in the U.S. pediatric population; however, all 22 cases did not provide evidence of a causal association with levetiracetam. All 22 cases reported alternative etiologies for the death or did not provide adequate information for causality assessment. Most cases (18 of 22) reported death secondary to seizure, SUDEP, or complications from hypoxic ischemic encephalopathy. The remaining four cases reported death secondary to respiratory failure or meningoencephalitis. More than half of the cases (12 of 22) also reported use of other concomitant AEDs, which also affects the causality assessment. In addition, children with epilepsy have an overall mortality rate of 228 per 100,000 person-years, 5 to 10 times greater than the age-matched death rate in the general population.<sup>23</sup> The incidence of SUDEP in children with epilepsy is approximately 0.22/1,000 patient-years.<sup>24</sup>

We identified four FAERS cases reporting the unlabeled events of cardiovascular adverse events, including cardiac arrest, cardiorespiratory failure, hypotension, and increased premature ventricular contractions. Three cases provided reasonable evidence of a possible causal association with levetiracetam because of the plausible temporal relationship. These three cases reported adverse events (cardiac arrest, cardiorespiratory failure, or hypotension) occurring after an overdose of levetiracetam. However, two of these three cases also reported ingestion of concomitant medications (metformin and paroxetine; lacosamide and cyclobenzaprine) that may provide an alternative etiology for the cardiac adverse event. Cardiac adverse events, including bradycardia and hypotension, have also been reported with levetiracetam overdose in the adult population.<sup>25</sup> In addition, levetiracetam partially inhibits N-type calcium currents in neuronal cells *in vitro*,<sup>4</sup> and inhibition of N-type calcium channels may inhibit norepinephrine release and result in cardiovascular effects.<sup>26</sup>

The remaining FAERS case of cardiovascular adverse events reported factors affecting causality assessment and was unlikely related to levetiracetam. This one case reported increased PVCs in a neonate with pre-existing PVCs.

We identified one FAERS case reporting the unlabeled event of rhabdomyolysis with levetiracetam in the pediatric population with evidence of a possible causal association. Rhabdomyolysis and CK elevation have also been reported with levetiracetam in pediatric and adult populations,<sup>20,27-32</sup> but a probable causal association has not been established because of confounding factors. Although all these cases reported a plausible temporal relationship with levetiracetam administration and positive dechallenge after levetiracetam discontinuation, all of these cases also report seizures prior to the initiation of levetiracetam and onset of rhabdomyolysis or CK elevation. Tonic-clonic seizures may cause CK elevation and are a nontraumatic exertional cause of rhabdomyolysis.<sup>33,34</sup> Therefore, it is unclear in our case whether the rhabdomyolysis or CK elevation occurred secondary to the seizures or levetiracetam administration.

OSE identified the signals of rhabdomyolysis and CK elevation with levetiracetam in FAERS and the literature prior to this pediatric review. OSE and the Office of New Drugs (OND) evaluated the signal and decided to continue pharmacovigilance with no labeling changes for rhabdomyolysis or CK elevation.

We identified one FAERS case reporting the unlabeled event of encephalopathy with levetiracetam in the pediatric population. This case provides evidence of a possible causal association of encephalopathy with levetiracetam because of the plausible temporal relationship and positive dechallenge after levetiracetam discontinuation. However, the case reports a supratherapeutic level of levetiracetam and other factors that may affect the causality assessment (acute renal failure, metabolic acidosis, respiratory distress) and lacks information regarding concomitant medications. Encephalopathy with levetiracetam has also been reported in the adult population, with and without renal failure.<sup>35-37</sup>

The association of levetiracetam with encephalopathy-related adverse events provides biologic plausibility supporting the possible association of levetiracetam with encephalopathy. Although levetiracetam is not labeled for encephalopathy, it is labeled for signs and symptoms of encephalopathy, including behavioral abnormalities, somnolence and fatigue, coordination difficulties, confusional state, sedation, dyskinesia, and coma in the context of overdose.

No clear patterns or trends suggested a new safety signal associated with the other reported serious unlabeled adverse events in the pediatric case series.

## **5 CONCLUSION**

We identified 276 FAERS cases with levetiracetam in the U.S. pediatric population reporting a serious outcome, including 22 deaths. All 22 death cases reported alternative etiologies for the death or did not provide adequate information for causality assessment. Our evaluation of postmarketing adverse event reports does not suggest any new or unexpected pediatric safety concerns with levetiracetam at this time. The majority of reported drug event combinations were consistent with the known risks described in the labeling, or were disease-related or indication-related. We identified five cases related to the unlabeled events of cardiovascular adverse events, rhabdomyolysis, or encephalopathy with a possible causal association. No clear patterns or trends suggested a new safety signal associated with the other reported serious unlabeled adverse events in the pediatric case series.

## **6 RECOMMENDATIONS**

We will continue routine pharmacovigilance for all pediatric adverse events associated with the use of levetiracetam, including cardiovascular adverse events, rhabdomyolysis, and encephalopathy as adverse events of interest in all patient populations.

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## **8 APPENDICES**

### **8.1 APPENDIX A. DRUG UTILIZATION DATABASE DESCRIPTIONS/LIMITATIONS**

#### **National Sales Perspectives (NSP)**

The QuintilesIMS National Sales Perspectives™ measures the volume of drug products, both prescription and over-the-counter, and selected diagnostic products moving from manufacturers into various outlets within the retail and non-retail markets. Volume is expressed in terms of sales dollars, eaches, extended units, and share of market. These data are based on national projections. Outlets within the retail market include the following pharmacy settings: chain drug stores, independent drug stores, mass merchandisers, food stores, and mail service. Outlets within the non-retail market include clinics, non-federal hospitals, federal facilities, HMOs, long-term care facilities, home health care, and other miscellaneous settings.

#### **QuintilesIMS, Total Patient Tracker (TPT)**

The QuintilesIMS, Total Patient Tracker (TPT) is a national-level projected audit designed to estimate the total number of unique patients across all drugs and therapeutic classes in the retail outpatient setting over time. TPT derives its data from the VectorOne® database which integrates prescription activity from a sample received from payers, switches, and other software systems that may arbitrage prescriptions at various points in the sales cycle. VectorOne® receives over 2.1 billion prescription claims per year. No statistical tests were conducted to determine whether statistically significant changes occurred over time; therefore, all changes over time or between products should be considered approximate and may be due to random error.

#### **Hospital Visit Analyzer (HVA)**

The Hospital Visit Analyzer (HVA) provides hospital inpatient and outpatient encounter transactions and patient level data drawn from hospital operational files and other reference sources. Encounter information is available from 2002, is collected weekly and monthly, and is available 25-30 days after the end of each monthly period. This robust data set includes >700 hospitals with hospital inpatient and outpatient encounter data linked to each appropriate patient as well as to select individual hospital departments by anonymized, consistent, longitudinal patient identifiers. These data include over 13 million patients and 60 million visits per year projected to approximately 37 million inpatient visits and 560 million outpatient (including Emergency Department) visits per year, representing acute care, short-term hospital inpatient sites, and their associated hospital emergency departments in order to measure and track the near term health care utilization of hospitalized patients. Each hospital patient encounter includes detailed drug, procedure, device, diagnosis, and applied charges data; location of initiation of each service within the hospital setting of care (for example, Pediatric, Intensive Care Units) by day for each patient's entire stay; and patient demographics and admission/discharge characteristics. HVA is representative geographically and across payer types, such as commercial insurers, Medicare and Medicaid.

The QuintilesIMS (QI) hospital sample does not include Federal hospitals, including VA facilities, and some other specialty hospitals (such as children's hospitals and other standalone specialty hospitals), and does not necessarily represent all acute care hospitals in the U.S. in all markets. Caveats of the QI hospital data source are common to this type of hospital charge information, but are mostly limited to limitations of charge descriptions and what is actually entered by the sample hospitals. However, validations of QI's hospital CDM data using both the National Hospital Discharge Survey (NHDS) and the AHRQ HCUP data have shown QI's patient level data to be representative and accurate across multiple therapeutic areas.

## **8.2 APPENDIX B. FDA ADVERSE EVENT REPORTING SYSTEM (FAERS)**

### **FDA Adverse Event Reporting System (FAERS)**

The FDA Adverse Event Reporting System (FAERS) is a database that contains information on adverse event and medication error reports submitted to FDA. The database is designed to support the FDA's post-marketing safety surveillance program for drug and therapeutic biologic products. The informatic structure of the database adheres to the international safety reporting guidance issued by the International Conference on Harmonisation. Adverse events and medication errors are coded to terms in the Medical Dictionary for Regulatory Activities (MedDRA) terminology. The suspect products are coded to valid tradenames or active ingredients in the FAERS Product Dictionary (FPD).

FAERS data have limitations. First, there is no certainty that the reported event was actually due to the product. FDA does not require that a causal relationship between a product and event be proven, and reports do not always contain enough detail to properly evaluate an event. Further, FDA does not receive reports for every adverse event or medication error that occurs with a product. Many factors can influence whether or not an event will be reported, such as the time a product has been marketed and publicity about an event. Therefore, FAERS data cannot be used to calculate the incidence of an adverse event or medication error in the U.S. population.

### 8.3 APPENDIX C. LIST OF OSE DESIGNATED MEDICAL EVENTS AND ASSOCIATED MEDDRA PTs

| Designated Medical Event                          | MedDRA Preferred Terms (Version 19.1)  |
|---|--|
| <b>Acute pancreatitis</b>                         | Pancreatic necrosis, Pancreatitis acute, Pancreatitis haemorrhagic, Pancreatitis necrotising, Pancreatitis, Haemorrhagic necrotic pancreatitis |
| <b>Acute respiratory failure</b>                  | Acute respiratory distress syndrome, Acute respiratory failure, Respiratory failure  |
| <b>Agranulocytosis</b>                            | Agranulocytosis, Febrile neutropenia, Neutropenia  |
| <b>Amyotrophic lateral sclerosis</b>              | Amyotrophic lateral sclerosis  |
| <b>Anaphylaxis and anaphylactoid reactions</b>    | Anaphylactic reaction, Anaphylactic shock, Anaphylactoid reaction, Anaphylactoid shock, Anaphylactic transfusion reaction                      |
| <b>Aplastic anemia</b>                            | Aplasia pure red cell, Aplastic anemia, Bone marrow failure  |
| <b>Blind</b>                                      | Blindness, Blindness transient, Blindness unilateral, Optic ischaemic neuropathy, Sudden visual loss   |
| <b>Colitis ischaemic</b>                          | Colitis ischaemic, Intestinal infarction   |
| <b>Congenital anomalies</b>                       | Congenital anomaly   |
| <b>Deaf</b>                                       | Deafness bilateral, Deafness neurosensory, Deafness permanent, Deafness transitory, Deafness unilateral, Deafness, Sudden hearing loss         |
| <b>Disseminated intravascular coagulation</b>     | Disseminated intravascular coagulation   |
| <b>Endotoxic shock, confirmed or suspected</b>    | Endotoxic shock, Septic shock  |
| <b>Haemolysis</b>                                 | Haemoglobinaemia, Haemoglobinuria, Haemolysis, Haptoglobin decreased, Intravascular haemolysis   |
| <b>Hemolytic anemia</b>                           | Coombs negative haemolytic anaemia, Coombs positive haemolytic anaemia, Haemolytic anaemia   |
| <b>Liver failure</b>                              | Acute hepatic failure, Hepatic encephalopathy, Hepatic failure, Subacute hepatic failure   |
| <b>Liver necrosis</b>                             | Hepatitis acute, Hepatitis fulminant, Hepatic necrosis   |
| <b>Liver transplant</b>                           | Liver transplant   |
| <b>Neuroleptic malignant syndrome</b>             | Neuroleptic malignant syndrome   |
| <b>Pancytopenia</b>                               | Pancytopenia   |
| <b>Progressive multifocal leukoencephalopathy</b> | Progressive multifocal leukoencephalopathy   |
| <b>Product infectious disease transmission</b>    | Suspected transmission of an infectious agent via product, Transmission of an infectious agent via product, Product contamination microbial    |
| <b>Pulmonary fibrosis</b>                         | Pulmonary fibrosis   |
| <b>Pulmonary hypertension</b>                     | Cor pulmonale, Pulmonary hypertension  |
| <b>Renal failure</b>                              | Renal failure, Acute kidney injury, Renal impairment   |
| <b>Rhabdomyolysis</b>                             | Rhabdomyolysis   |
| <b>Seizure</b>                                    | Seizure, Epilepsy, Generalised tonic-clonic seizure  |
| <b>Serotonin syndrome</b>                         | Serotonin syndrome   |
| <b>Stevens-Johnson syndrome</b>                   | Erythema multiforme, Stevens-Johnson syndrome  |
| <b>Sudden death</b>                               | Sudden cardiac death, Sudden death   |
| <b>Suicide</b>                                    | Completed suicide  |
| <b>Torsade de Pointes</b>                         | Torsade de pointes   |
| <b>Toxic epidermal necrolysis</b>                 | Dermatitis exfoliative, Toxic epidermal necrolysis   |
| <b>TTP</b>  | Thrombotic thrombocytopenic purpura  |
| <b>Ventricular fibrillation</b>                   | Ventricular fibrillation   |

#### **8.4 APPENDIX D. DATA MINING OF FAERS USING EMPIRICA SIGNAL**

Empirica Signal refers to the software that OSE uses to perform data mining analyses while using the Multi-item Gamma Poisson Shrinker (MGPS) data mining algorithm. “Data mining” refers to the use of computer algorithms to identify patterns of associations or unexpected occurrences (i.e., “potential signals”) in large databases. These potential signals can then be evaluated for intervention as appropriate. In OSE, the FDA Adverse Event Reporting System (FAERS) database is utilized for data mining. MGPS analyzes the records in FAERS and then quantifies reported drug-event associations by producing a set of values or scores that indicate varying strengths of reporting relationships between drugs and events. These scores, denoted as Empirical Bayes Geometric Mean (EBGM) values, provide a stable estimate of the relative reporting of an event for a particular drug relative to all other drugs and events in FAERS. MGPS also calculates lower and upper 90% confidence limits for EBGM values, denoted EB05 and EB95, respectively. Because EBGM scores are based on FAERS data, limitations relating to FAERS data also apply to data mining-derived data. Further, drug and event causality cannot be inferred from EBGM scores.

**8.5 APPENDIX E. FAERS CASE NUMBERS, FAERS VERSION NUMBERS AND MANUFACTURER CONTROL NUMBERS FOR THE PEDIATRIC CASE SERIES WITH DRUG (N=276)**

| FAERS Case #         | Version # | Manufacturer Control #                                   |
|----------------------|-----------|--|
| 12968620             | 1         |  |
| 13025491             | 1         | US-UCBSA-2016047791                                      |
| 13025492             | 1         | US-UCBSA-2016047786                                      |
| 13025493             | 1         | US-UCBSA-2016047787                                      |
| 13025494             | 1         | US-UCBSA-2016047788                                      |
| 13025499             | 1         | US-UCBSA-2016047636                                      |
| 13025500             | 1         | US-UCBSA-2016047789                                      |
| 13025541             | 1         | US-UCBSA-2016047792                                      |
| 13025542             | 1         | US-UCBSA-2016047790                                      |
| 10280172             | 1         | US-UCBSA-2014004623                                      |
| 10280183             | 1         | US-UCBSA-2014004624                                      |
| 10884951             |           |  |
| 10527229 (duplicate) | 1         |  |
| 11610875             | 1         |  |
| 10763382             | 1         | 2014015151   |
| 11596490             | 1         | US-JNJFOC-20150924527                                    |
| 11992572             | 1         | US-UCBSA-2015010946                                      |
| 9330858              | 1         |  |
| 10462327             | 1         | US-ROXANE LABORATORIES, INC.-2014-RO-01386RO             |
| 10637629 (duplicate) | 1         | US-GLENMARK PHARMACEUTICALS EUROPE LIMITED-2014GMK012323 |
| 10809822 (duplicate) | 1         | CC15-0144  |
| 10569659 (duplicate) | 1         | GB-AUROBINDO-AUR-APL-2014-11580                          |
| 10463519 (duplicate) | 1         | US-DRREDDYS-USA/USA/14/0043031                           |
| 10484082 (duplicate) | 1         | 2014HINLIT0855   |
| 11138725             | 1         | PHHY2015US062564   |
| 11986867             | 1         | US-UCBSA-2015005415                                      |
| 12891849             | 1         | US-UCBSA-2016040737                                      |
| 12347331 (duplicate) | 1         | US-UCBSA-2016015477                                      |
| 10467497             | 1         | US-UCBSA-2014012193                                      |
| 10440710 (duplicate) | 2         | US-AUROBINDO-AUR-APL-2014-09585                          |
| 11994332             | 1         | US-UCBSA-2015031332                                      |
| 10947110             | 2         | US-JNJFOC-20140709882                                    |
| 9604661              | 1         | US-UCBSA-099690  |
| 10366946 (duplicate) | 1         | 2013SP006895   |
| 9594978 (duplicate)  | 1         | AUR-APL-2013-08123                                       |
| 10338051             | 1         |  |
| 11992512             | 1         | US-UCBSA-2015007786                                      |
| 11743759             | 1         | US-UCBSA-2015035898                                      |
| 11811996             | 2         | US-ENDO PHARMACEUTICALS INC.-2015-004552                 |
| 9627919              | 1         | US-LUNDBECK-DKLU1093117                                  |
| 11994059             | 1         | US-UCBSA-2015027357                                      |
| 10284815             | 1         |  |
| 12875286             | 1         | US-UCBSA-2016039987                                      |
| 10957787             | 1         | US-BAXTER-2015BAX015494                                  |
| 11773868             | 2         | US-LUNDBECK-DKLU2006880                                  |
| 9499636              | 1         |  |
| 9627294              | 1         | US-LUNDBECK-DKLU1085307                                  |

| <b>FAERS Case #</b>  | <b>Version #</b> | <b>Manufacturer Control #</b>                            |
|----------------------|------------------|--|
| 9554651              | 2                | US-PFIZER INC-2013271317                                 |
| 10937062 (duplicate) | 2                | US-JNJFOC-20130914893                                    |
| 9585516 (duplicate)  | 1                | 2013SP006896   |
| 9593093 (duplicate)  | 1                | AUR-APL-2013-08120                                       |
| 11987508             | 1                | US-UCBSA-2015025044                                      |
| 10563294             | 1                | US-PFIZER INC-2014302829                                 |
| 12092934             | 1                | US-UCBSA-2016005584                                      |
| 10937130             | 2                | US-JNJFOC-20141021540                                    |
| 12239303             | 3                | GXBR2016US000918   |
| 9717325              | 2                | US-LUNDBECK-DKLU1095521                                  |
| 13009299             | 1                | US-UCBSA-2016034534                                      |
| 10308097             | 1                |  |
| 12067186             | 1                | US-JNJFOC-20160116381                                    |
| 10154712             | 1                |  |
| 10763587             | 1                | 2014014735   |
| 11814737             | 3                | US-UCBSA-2015039403                                      |
| 11997416             | 1                | US-ABBVIE-16P-163-1550128-00                             |
| 11212304             | 1                |  |
| 12120329             | 1                | PHEH2016US004642   |
| 10710235             | 1                | US-UCBSA-2015000652                                      |
| 10762099             | 1                | 2014017201   |
| 11724714             | 3                | US-UCBSA-2015007784                                      |
| 11986744             | 1                | US-UCBSA-2015005431                                      |
| 11986869             | 1                | US-UCBSA-2014017201                                      |
| 11992502             | 1                | US-UCBSA-2015007789                                      |
| 11376392             | 1                | US-UCBSA-2015025270                                      |
| 11688754             | 1                | US-UCBSA-2015027944                                      |
| 10754191             | 1                | US-UCBSA-2015002165                                      |
| 10763347             | 1                | 2014014775   |
| 11986699             | 1                | US-UCBSA-2015002892                                      |
| 11987464             | 1                | US-UCBSA-2015012620                                      |
| 12402999             | 1                | US-UCBSA-2016019075                                      |
| 12854838             | 1                | US-UCBSA-2016039095                                      |
| 10911932             | 2                | US-MERCK-1503USA005864                                   |
| 11210945             | 1                | US-ALEMBIC PHARMACEUTICALS LIMITED-2015SCAL000253        |
| 10538046             | 1                |  |
| 10978804             | 1                |  |
| 11102056             | 1                | US-GLENMARK PHARMACEUTICALS EUROPE LIMITED-2015GMK016749 |
| 12556359             | 1                |  |
| 10229723             | 1                |  |
| 9664103              | 1                |  |
| 10359404             | 1                |  |
| 10573895             | 1                | PHHY2014US140646   |
| 10914374             | 1                | US-GLAXOSMITHKLINE-US2015GSK032307                       |
| 11986760 (duplicate) | 1                | US-UCBSA-2015006226                                      |
| 10936907             | 2                | US-JNJFOC-20141006637                                    |
| 10570422             | 1                | US-UCBSA-2014016422                                      |
| 11309928             | 1                | US-LUNDBECK-DKLU2001857                                  |
| 11417503             | 1                | US-LUNDBECK-DKLU2003113                                  |
| 11987472             | 1                | US-UCBSA-2014020533                                      |
| 10868339             | 1                | US-LUNDBECK-DKLU1109028                                  |
| 10936943 (duplicate) | 2                | US-JNJFOC-20150214623                                    |
| 11590994             | 1                | US-AUROBINDO-AUR-APL-2015-08832                          |
| 11609156             | 1                | US-LUNDBECK-DKLU2004799                                  |

| FAERS Case #         | Version # | Manufacturer Control #                                   |
|----------------------|-----------|--|
| 9344494              | 1         |  |
| 9458644              | 4         | AUR-APL-2013-06565                                       |
| 10930623             | 1         | US-JNJFOC-20150309296                                    |
| 10787791 (duplicate) | 2         | US-UCBSA-2015003217                                      |
| 10925266             | 1         | 2014007865   |
| 11886797             | 1         | US-UCBSA-2015043273                                      |
| 11781854 (duplicate) | 1         | US-UCBSA-2015037232                                      |
| 11986413             | 1         | US-UCBSA-2014021078                                      |
| 11994111             | 1         | US-UCBSA-2015027470                                      |
| 10387685             | 1         | US-UCBSA-2014008776                                      |
| 10936857 (duplicate) | 2         | US-JNJFOC-20140719676                                    |
| 10655467             | 1         | US-UCBSA-2014021676                                      |
| 9832815 (duplicate)  | 1         | US-GLAXOSMITHKLINE-B0961592A                             |
| 10655507 (duplicate) | 1         | US-UCBSA-2014021673                                      |
| 9828374 (duplicate)  | 1         | US-GLAXOSMITHKLINE-B0960875A                             |
| 11722841             | 1         | US-LUNDBECK-DKLU2006225                                  |
| 10570111             | 2         | US-AUROBINDO-AUR-APL-2014-09638                          |
| 10463561 (duplicate) | 1         | US-DRREDDYS-USA/USA/14/0043032                           |
| 10637635 (duplicate) | 1         | US-GLENMARK PHARMACEUTICALS EUROPE LIMITED-2014GMK012324 |
| 10809784 (duplicate) | 1         | CC15-0145  |
| 9593370              | 9         | US-ALEXION-A201301855                                    |
| 11289601             | 2         | US-UCBSA-2015022156                                      |
| 11992503             | 1         | US-UCBSA-2015007136                                      |
| 9330861              | 1         |  |
| 9903010              | 2         | PHEH2014US002487   |
| 9885961 (duplicate)  | 1         | US-GLAXOSMITHKLINE-A1060312A                             |
| 10218584 (duplicate) | 1         | US-LUNDBECK-DKLU1100427                                  |
| 9890963 (duplicate)  | 2         | US-ABBVIE-14P-163-1199174-00                             |
| 9879579 (duplicate)  | 2         | US-UCBSA-111075  |
| 12400233             | 1         |  |
| 11992618             | 1         | US-UCBSA-2015012202                                      |
| 12756087             | 1         | US-UCBSA-2016035334                                      |
| 11819701             | 1         | US-JNJFOC-20151118874                                    |
| 10896063             | 1         | US-UCBSA-2015005669                                      |
| 11665452             | 1         |  |
| 11986785             | 1         | US-UCBSA-2014014097                                      |
| 10763517 (duplicate) | 1         | 2014014097   |
| 11986868             | 1         | US-UCBSA-2015006241                                      |
| 10922916 (duplicate) | 1         | US-LUNDBECK-DKLU1109875                                  |
| 10949452 (duplicate) | 1         | US-ABBVIE-15P-163-1363323-00                             |
| 11345803 (duplicate) | 1         | US-ABBVIE-15P-163-1358859-00                             |
| 10937146             | 2         | US-JNJFOC-20150217719                                    |
| 10655468             | 1         | US-UCBSA-2014021672                                      |
| 9832816              | 1         | US-GLAXOSMITHKLINE-B0961593A                             |
| 10655469             | 1         | US-UCBSA-2014021675                                      |
| 9832818              | 1         | US-GLAXOSMITHKLINE-B0961595A                             |
| 10785131             | 1         | US-UCBSA-2015002928                                      |
| 9707205              | 1         | US-JNJFOC-20131110844                                    |
| 9529176              | 1         | US-LUNDBECK-DKLU1089070                                  |
| 13053284             | 1         |  |
| 11807698             | 2         | US-UCBSA-2015030819                                      |
| 12628471             | 1         |  |
| 10337992             | 1         |  |
| 10527924             | 1         | US-UCBSA-2014014737                                      |
| 12228030             | 1         | US-UCBSA-2015040834                                      |
| 11450997             | 1         | US-DRREDDYS-USA/USA/15/0050394                           |

| FAERS Case #         | Version # | Manufacturer Control #                             |
|----------------------|-----------|--|
| 12456112             | 1         | US-SUN PHARMACEUTICAL INDUSTRIES LTD-2016US-117772 |
| 10412605             | 1         |  |
| 11430371             | 1         | PHEH2015US007300                                   |
| 10752846             | 1         | US-LUNDBECK-DKLU1108066                            |
| 10766037 (duplicate) | 2         | US-PFIZER INC-2015045046                           |
| 11694314             | 1         | US-GLAXOSMITHKLINE-US2015GSK156607                 |
| 10925583             | 1         | 2014000946   |
| 11828883             | 1         | US-LUNDBECK-DKLU2007786                            |
| 11993981             | 1         | US-UCBSA-2015026124                                |
| 11434756 (duplicate) | 1         | PHEH2015US016655                                   |
| 10655505             | 1         | US-UCBSA-2014021671                                |
| 9824189 (duplicate)  | 1         | US-GLAXOSMITHKLINE-B0960845A                       |
| 11128836             | 2         | US-UCBSA-2015015972                                |
| 12833558             | 1         | US-TARO-2016TAR00832                               |
| 12093761             | 1         |  |
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| 10494474             | 1         |  |
| 10938900             | 2         | US-JNJFOC-20140200985                              |
| 10924205 (duplicate) | 1         | 108754U  |
| 10544204             | 1         |  |
| 11138768             | 1         | PHHY2015US061717                                   |
| 10472342             | 1         | 2014PRN00023                                       |
| 11061665 (duplicate) | 1         | CC14-1676  |
| 10435265 (duplicate) | 1         | US-AUROBINDO-AUR-APL-2014-09470                    |
| 10453454 (duplicate) | 2         | US-UCBSA-2014011514                                |
| 10488794 (duplicate) | 1         | 2014AJA00031                                       |
| 9922236              | 1         |  |
| 10365229             | 1         |  |
| 10344230             | 1         |  |
| 10040785             | 2         | PHHY2013US035945                                   |
| 10727062             | 1         |  |
| 12337347             | 1         |  |
| 11587920             | 1         | US-MEDA-2014100053                                 |
| 12114090             | 1         | US-UCBSA-2016005924                                |
| 12133968             | 1         | PHEH2016US004476                                   |
| 12123587             | 1         |  |
| 10938909             | 2         | US-JNJFOC-20140401813                              |
| 11450996             | 1         | US-DRREDDYS-USA/USA/15/0050410                     |
| 11620847 (duplicate) | 1         | US-LPDUSPRD-20150780                               |
| 10655509             | 1         | US-UCBSA-2014021674                                |
| 9832817 (duplicate)  | 1         | US-GLAXOSMITHKLINE-B0961594A                       |
| 10925509             | 1         | 122949U  |
| 11169388             | 1         | US-GLAXOSMITHKLINE INC.-US2015GSK077164            |
| 11430166 (duplicate) | 2         | PHEH2015US010166                                   |
| 12069431             | 1         | US-HETERO LABS LTD-1047653                         |
| 9792004              | 1         | US-UCBSA-107064                                    |
| 10404188             | 1         | PHEH2012US000565                                   |
| 10565888             | 1         | US-UCBSA-2014016808                                |
| 12609446             | 1         | US-LUPIN PHARMACEUTICALS INC.-2015-03191           |
| 12609486             | 1         | US-LUPIN PHARMACEUTICALS INC.-2015-04022           |
| 10871090             | 1         | US-LUNDBECK-DKLU1108975                            |
| 11318342             | 1         | US-LUNDBECK-DKLU2002117                            |
| 11375560             | 2         | US-UCBSA-2015025032                                |
| 10657923             | 2         | PHHY2014US150911                                   |
| 11387847             | 4         | PHEH2014US021399                                   |
| 10276391             | 1         |  |
| 10358569             | 5         | PHHY2014US079448                                   |

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| 9347911              | 1         |   |
| 9973244              | 1         | 085435  |
| 11574362             | 1         |   |
| 12411977             | 1         |   |
| 11871672             | 1         | PHEH2015US027008                                      |
| 13051573             | 1         |   |
| 10689309             | 1         | US-ACCORD-027916                                      |
| 10688794 (duplicate) | 1         | US-AUROBINDO-AUR-APL-2014-13746                       |
| 12950312             | 1         | US-SAGENTPRD-2016-US-000055                           |
| 10547996             | 1         |   |
| 13023384             | 1         |   |
| 10906498             | 4         | US-UCBSA-2015001084                                   |
| 11994764             | 1         | US-UCBSA-2015035642                                   |
| 11890449 (duplicate) | 2         | US-ABBVIE-15P-163-1530538-00                          |
| 10551133             | 1         | US-UCBSA-2014015208                                   |
| 12073229             | 1         |   |
| 11518762             | 2         | US-TEVA-594853USA                                     |
| 11516557 (duplicate) | 4         | US-ACTAVIS-2015-19742                                 |
| 12216308 (duplicate) | 1         | US-AUROBINDO-AUR-APL-2015-06710                       |
| 11522887 (duplicate) | 2         | US-UCBSA-2015029385                                   |
| 11535054 (duplicate) | 2         | US-SUN PHARMACEUTICAL INDUSTRIES LTD-2015US-103337    |
| 11575289 (duplicate) | 2         | US-DEXPHARM-20151679                                  |
| 11694461 (duplicate) | 1         | US-ROXANE LABORATORIES, INC.-2015-RO-01787RO          |
| 11390594 (duplicate) | 2         | US-ACCORD-032808                                      |
| 12543906             | 2         | US-ALVOGEN-2016-ALVOGEN-025864                        |
| 12541267 (duplicate) | 1         | US-WEST-WARD PHARMACEUTICALS CORP.-US-H14001-16-01243 |
| 12546391 (duplicate) | 2         | US-TEVA-675198USA                                     |
| 12551503 (duplicate) | 1         | US-BAUSCH-BL-2016-016247                              |
| 12552367 (duplicate) | 1         | US-SUN PHARMACEUTICAL INDUSTRIES LTD-2016US-120187    |
| 12544270 (duplicate) | 2         | US-UCBSA-2016025617                                   |
| 12573183 (duplicate) | 1         | US-AUROBINDO-AUR-APL-2016-09401                       |
| 12572939 (duplicate) | 1         | US-ACCORD-042454                                      |
| 9587733              | 3         | US-UCBSA-099256                                       |
| 9540724 (duplicate)  | 2         | US-LUNDBECK-DKLU1093726                               |
| 12977253             | 1         | US-ACCORD-045766                                      |
| 11725028             | 1         | US-UCBSA-2014010795                                   |
| 10924802 (duplicate) | 1         | 2014010795  |
| 10132962             | 1         | US-JNJFOC-20140411956                                 |
| 9604628              | 1         | US-UCBSA-099669                                       |
| 9595014 (duplicate)  | 1         | AUR-APL-2013-08093                                    |
| 10366941 (duplicate) | 1         | 2013SP006864  |
| 12928047             | 1         | US-UCBSA-2016027926                                   |
| 11682087             | 2         | US-ROCHE-1652414                                      |
| 11667886 (duplicate) | 2         | US-UCBSA-2015033873                                   |
| 11687712 (duplicate) | 1         | US-LUNDBECK-DKLU2005893                               |
| 11690752 (duplicate) | 1         | US-ENDO PHARMACEUTICALS INC.-2015-003675              |
| 11696082 (duplicate) | 2         | US-ABBVIE-15P-163-1490343-00                          |
| 11706232 (duplicate) | 2         | US-ABBVIE-15P-163-1496154-00                          |
| 11980855 (duplicate) | 1         | US-BAUSCH-BL-2016-001874                              |
| 10644455             | 1         | US-LUNDBECK-DKLU1106304                               |
| 9882976              | 1         | 20140023  |
| 11358852             | 1         |   |
| 9604563              | 1         | US-UCBSA-099703                                       |
| 10366947 (duplicate) | 1         | 2013SP006897  |
| 9595051 (duplicate)  | 1         | AUR-APL-2013-08118                                    |
| 9661580              | 1         | AUR-APL-2013-09031                                    |
| 9337057              | 1         | US-UCBSA-088151                                       |

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| 11993677             | 1         |   |
| 9325745              | 1         |   |
| 10338002             | 1         |   |
| 11217538             | 1         | PHHY2015US056358                                    |
| 12818604             | 2         | PHHY2016US135985                                    |
| 11457307             | 1         | US-ACCORD-033425                                    |
| 9625545              | 2         | US-ROXANE LABORATORIES, INC.-2013-RO-01671RO        |
| 11990404             | 5         | US-MEDTRONIC-1047217                                |
| 11371531             | 2         | US-UCBSA-2015024886                                 |
| 11626585             | 1         | US-UCBSA-2014014617                                 |
| 12677640             | 1         | US-UCBSA-2016031804                                 |
| 11660526             | 1         | US-KNIGHT THERAPEUTICS (USA) INC.-1043373           |
| 12536849             | 1         | US-CONCORDIA PHARMACEUTICALS INC.-GSH201607-003469  |
| 10283315             | 1         |   |
| 11833979             | 2         | US-ENDO PHARMACEUTICALS INC.-2015-004879            |
| 11986783             | 1         | US-UCBSA-2014020682                                 |
| 10772415             | 1         | US-ACCORD-028505                                    |
| 11381740 (duplicate) | 1         | PHHY2015US095420                                    |
| 12070980 (duplicate) | 1         | US-PRINSTON PHARMACEUTICAL INC.-2016PRN00029        |
| 11360754 (duplicate) | 1         | US-ACTAVIS-2015-16475                               |
| 11398763 (duplicate) | 1         | US-LUPIN PHARMACEUTICALS INC.-2015-02468            |
| 10783924 (duplicate) | 2         | US-ALVOGEN-2015AL000231                             |
| 11546457 (duplicate) | 2         | US-LPDUSPRD-20150716                                |
| 12076396 (duplicate) | 1         | US-AJANTA PHARMA USA INC.-1047787                   |
| 12637664             | 1         | US-ABBVIE-15P-163-1468037-00                        |
| 9547821              | 1         | 2013-01241  |
| 9494308              | 1         | LEVE20130007  |
| 9474831 (duplicate)  | 1         | PHHY2013US089291                                    |
| 9472242 (duplicate)  | 1         | US-TEVA-427629USA                                   |
| 9482594 (duplicate)  | 1         | US-MYLANLABS-2013S1018436                           |
| 9495212 (duplicate)  | 1         | US-ROXANE LABORATORIES, INC.-2013-RO-01446RO        |
| 9500007 (duplicate)  | 1         | US-UCBSA-096895                                     |
| 9513995 (duplicate)  | 1         | US-TARO PHARMACEUTICALS U.S.A., INC-2013SUN04604    |
| 9537344 (duplicate)  | 1         | US-MUTUAL PHARMACEUTICAL COMPANY, INC.-LVTM20130005 |
| 9498847 (duplicate)  | 1         | USA/USA/13/0034289                                  |
| 9486424 (duplicate)  | 1         | 2013AP007497  |
| 9511042 (duplicate)  | 1         | FK201303689   |
| 9507294 (duplicate)  | 1         | 2013/166  |
| 9612544 (duplicate)  | 1         | 20130510  |
| 9490443 (duplicate)  | 2         | AUR-APL-2013-07063                                  |
| 12596567 (duplicate) | 1         | US-ENDO PHARMACEUTICALS INC-LEVE20130007            |
| 12241983             | 1         | US-UCBSA-2016012034                                 |
| 10910672             | 1         | US-ABBVIE-14P-163-1315124-00                        |
| 9407522              | 1         | US-JNJFOC-20130706928                               |
| 10591531             | 1         | US-LUNDBECK-DKLU1105730                             |
| 11856210             | 1         | US-MYLANLABS-2015M1027431                           |
| 10469369             | 2         | PHHY2014US115035                                    |
| 10863598             | 2         | PHHY2014US130071                                    |
| 9353102              | 1         |   |
| 10495402             | 1         | ADR-2014-00656                                      |
| 12529793             | 1         |   |
| 10196893             | 3         | US-UCBSA-122082                                     |
| 13037204             | 1         | US-PFIZER INC-2016576096                            |
| 11466963             | 1         | US-UCBSA-2015028140                                 |
| 12935901             | 1         |   |
| 9422050              | 1         |   |
| 10368217             | 1         |   |

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| 10341281             | 3                | US-UCBSA-2014005960                                |
| 12609465             | 1                | US-LUPIN PHARMACEUTICALS INC.-2015-03193           |
| 13075101             | 1                | US-ZYDUS-013023                                    |
| 12938844 (duplicate) | 1                | US-ALVOGEN-2016-ALVOGEN-086381                     |
| 12961884 (duplicate) | 1                | US-UCBSA-2016043086                                |
| 13063146 (duplicate) | 1                | US-SUN PHARMACEUTICAL INDUSTRIES LTD-2016US-129995 |
| 13067297 (duplicate) | 1                | US-APOTEX-2016AP016018                             |
| 13069475 (duplicate) | 1                | US-TEVA-723025USA                                  |
| 11195932             | 1                |  |
| 10655379             | 1                |  |
| 12936305             | 1                |  |
| 10925036             | 1                | 2014012916   |
| 10763544 (duplicate) | 1                | 2014014153   |
| 10508873 (duplicate) | 1                | US-ELI_LILLY_AND_COMPANY-US201410001321            |
| 9669872              | 1                | AUR-APL-2013-08303                                 |
| 12406007             | 2                | US-LUPIN PHARMACEUTICALS INC.-E2B_00005458         |
| 12257330             | 1                | PHHY2016US047901                                   |
| 12238851 (duplicate) | 1                | US-MDT-ADR-2016-00628                              |
| 9649492              | 1                | 2013-01417   |
| 10196323             | 4                | ADR-2013-02060                                     |
| 9416445              | 1                | US-MYLANLABS-2013S1015593                          |
| 10065345             | 2                | ADR-2014-00538                                     |
| 10163052 (duplicate) | 2                | PHHY2014US041059                                   |
| 12173735             | 1                |  |
| 10924118             | 1                | 2014005292   |
| 10925358             | 1                | 2014008785   |
| 10925522             | 1                | 122951U  |
| 9595091              | 1                | AUR-APL-2013-08089                                 |
| 10366942 (duplicate) | 1                | 2013SP006862                                       |
| 9411183              | 1                | US-MYLANLABS-2013S1015420                          |
| 10328184             | 1                | PHEH2014US014322                                   |
| 9330892              | 1                |  |
| 12253862             | 1                | US-UCBSA-2016011887                                |
| 10796302             | 2                | US-UCBSA-2015000299                                |
| 10405554             | 1                | US-LUPIN PHARMACEUTICALS INC.-E2B_00002383         |
| 9396608              | 1                | US-UCBSA-091056                                    |
| 10248639             | 1                |  |
| 10397614             | 1                | PHHY2014US102479                                   |
| 11694035             | 3                | US-APOTEX-2015AP013867                             |

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| 10453143             | 4         | US-TEVA-508022USA                                  |
| 10440298 (duplicate) | 1         | PHHY2014US109596                                   |
| 11309603 (duplicate) | 1         | PHHY2015US086433                                   |
| 11542866 (duplicate) | 1         | US-MORTON GROVE PHARMACEUTICALS, INC.-1042238      |
| 11368068 (duplicate) | 1         | ADR-2015UNK160                                     |
| 10442477 (duplicate) | 1         | 2014AP004469                                       |
| 10452745 (duplicate) | 1         | US-TARO PHARMACEUTICALS U.S.A., INC-2014SUN02067   |
| 11311579 (duplicate) | 1         | US-TARO PHARMACEUTICALS U.S.A., INC-2015SUN01692   |
| 10453866 (duplicate) | 1         | US-ROXANE LABORATORIES, INC.-2014-RO-01372RO       |
| 10463586 (duplicate) | 1         | US-DRREDDYS-USA/USA/14/0043023                     |
| 10469560 (duplicate) | 2         | US-ZYDUS-005001                                    |
| 10900492 (duplicate) | 1         | US-GLENMARK PHARMACEUTICALS EUROPE LIMITED-        |
| 11143611 (duplicate) | 2         | 2015GMK014609                                      |
| 11291791 (duplicate) | 3         | US-ACCORD-030920                                   |
| 11294518 (duplicate) | 1         | US-ACTAVIS-2015-15069                              |
| 11340749 (duplicate) | 1         | US-HI4001-15-01392                                 |
| 11359780 (duplicate) | 4         | US-FRESENIUS KABI-FK201503660                      |
| 11381186 (duplicate) | 1         | US-DRREDDYS-USA/USA/15/0049880                     |
| 10435269 (duplicate) | 2         | US-ROXANE LABORATORIES, INC.-2015-RO-01322RO       |
| 10446660 (duplicate) | 6         | US-AUROBINDO-AUR-APL-2014-09467                    |
| 10452349 (duplicate) | 5         | US-RANBAXY-2014US-85163                            |
| 10466249 (duplicate) | 1         | US-UCBSA-2014011510                                |
| 10484071 (duplicate) | 2         | FK201403670  |
| 11117473 (duplicate) | 3         | 2014HINLIT0856                                     |
| 11143002 (duplicate) | 1         | US-AUROBINDO-AUR-APL-2015-04283                    |
| 11315927 (duplicate) | 1         | US-ALVOGEN-2015AL002122                            |
| 12080672 (duplicate) | 1         | 2014US-85163                                       |
| 10392851             | 1         | US-AUROBINDO-AUR-APL-2016-01119                    |
| 10365363 (duplicate) | 1         | 2014HINLIT0706                                     |
| 10431575 (duplicate) | 2         | 2014AP003701                                       |
| 10187131 (duplicate) | 1         | 20140578   |
| 10415337 (duplicate) | 1         | US-ACCORD-023776                                   |
| 10954274 (duplicate) | 1         | US-ZYDUS-004145                                    |
| 11318478 (duplicate) | 1         | US-ACTAVIS-2015-05971                              |
| 10381004 (duplicate) | 1         | US-LUPIN PHARMACEUTICALS INC.-2015-01732           |
| 11922852 (duplicate) | 1         | 2014/056   |
| 12114035             | 1         | US-SUN PHARMACEUTICAL INDUSTRIES LTD-2016US-109690 |
| 11292564             | 2         |  |
| 11215679             | 2         | PHEH2015US014062                                   |
| 12613509             | 1         | US-APOTEX-2015AP009976                             |
| 10761930             | 1         | US-LUPIN PHARMACEUTICALS INC.-2016-03330           |
| 11994745             | 1         | 2014016445   |
|                      |           | US-UCBSA-2015035942                                |

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| 11549994             | 2                | US-TEVA-596583USA                                     |
| 11546455 (duplicate) | 1                | PHHY2015US112459                                      |
| 11580820 (duplicate) | 2                | US-BRISTOL-MYERS SQUIBB COMPANY-BMS-2015-065467       |
| 11610805 (duplicate) | 1                | US-BRISTOL-MYERS SQUIBB COMPANY-BMS-2015-066346       |
| 11561396 (duplicate) | 1                | US-APOTEX-2015AP013019                                |
| 11575037 (duplicate) | 1                | US-TARO PHARMACEUTICALS USA.,INC-2015SUN02058         |
| 11617788 (duplicate) | 1                | US-PRINSTON PHARMACEUTICAL INC.-2015PRN00082          |
| 11540814 (duplicate) | 1                | US-WEST-WARD PHARMACEUTICALS CORP.-US-H14001-15-01713 |
| 11544838 (duplicate) | 2                | US-ACTAVIS-2015-20327                                 |
| 11558297 (duplicate) | 1                | US-GLENMARK PHARMACEUTICALS INC, USA.-2015GMK019688   |
| 11558550 (duplicate) | 1                | US-LUPIN PHARMACEUTICALS INC.-2015-02943              |
| 11573265 (duplicate) | 1                | US-BAUSCH-BL-2015-022136                              |
| 11574486 (duplicate) | 1                | US-FRESENIUS KABI-FK201504524                         |
| 11582821 (duplicate) | 1                | US-HOSPIRA-3020041                                    |
| 11591011 (duplicate) | 1                | US-INVENTIA-000079                                    |
| 11591012 (duplicate) | 1                | US-ALKEM-001252                                       |
| 11591020 (duplicate) | 1                | US-INDICUS PHARMA-000365                              |
| 11591848 (duplicate) | 1                | US-ACCORD-034068                                      |
| 11614967 (duplicate) | 1                | US-DRREDDYS-USA/USA/15/0053189                        |
| 11617960 (duplicate) | 1                | US-ZYDUS-009179                                       |
| 11761882 (duplicate) | 1                | US-ROXANE LABORATORIES, INC.-2015-RO-01935RO          |
| 11556335 (duplicate) | 1                | US-IMPAX LABORATORIES, INC-2015-IPXL-00955            |
| 11557902 (duplicate) | 1                | US-ALVOGEN-2015AL003777                               |
| 11558316 (duplicate) | 2                | US-UCBSA-2015030323                                   |
| 11568533 (duplicate) | 3                | US-SUN PHARMACEUTICAL INDUSTRIES LTD-2015R1-103811    |
| 11572306 (duplicate) | 1                | US-IPCA LABORATORIES LIMITED-IPC201509-000643         |
| 11618582 (duplicate) | 1                | US-ORCHID HEALTHCARE-1042809                          |
| 11621543 (duplicate) | 1                | US-AJANTA PHARMA USA INC.-1042838                     |
| 11636269 (duplicate) | 1                | US-HETERO LABS LTD-1043027                            |
| 11644018 (duplicate) | 3                | US-AUROBINDO-AUR-APL-2015-09300                       |
| 13038769             | 1                | UUS-UCBSA-2016042819                                  |
| 12946146 (duplicate) | 1                | US-PFIZER INC-2016560474                              |
| 13002398 (duplicate) | 1                | US-DEXPHARM-20162349                                  |
| 13008184 (duplicate) | 1                | US-ALVOGEN-2016-ALVOGEN-087279                        |
| 13022137 (duplicate) | 1                | US-HETERO LABS LTD-1061013                            |
| 13043327 (duplicate) | 1                | US-TOLMAR INC.-1060974S-ACCORD-046568                 |
| 13039776 (duplicate) | 1                |   |
| 10582330             | 2                | US-UCBSA-2014011653                                   |
| 9516527              | 2                | US-ROXANE LABORATORIES, INC.-2013-RO-01499RO          |
| 11994666             | 1                | US-UCBSA-2015029315                                   |

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