

## Mid-Cycle Communication

**Application Type:** Original Biologics License Application (BLA)  
**Tracking Number:** STN 125590/0  
**Product Name:** Immune Globulin Intravenous (Human) [RI-002]  
**Proposed Indication:** Treatment of primary immunodeficiency disease  
**Applicant:** ADMA Biologics, Inc. (ADMA)  
**Meeting Date & Time:** January 19, 2016, 10 AM, EST  
**Committee Chair:** Pei Zhang, MD  
**RPM:** Yu Do, MS

### FDA Attendees:

Pei Zhang, MD, Research Biologist, DHRR/OBRR/CBER  
Michael Kennedy, PhD, Biologist (Team Lead), DHRR/OBRR/CBER  
Yu Do, MS, Regulatory Project Manager (RPM), RPMS/OBRR/CBER

### Other Attendees:

Christopher Sese, Independent Assessor, Eastern Research Group, Inc.

### ADMA Attendees:

James Mond, MD, PhD, Chief Scientific Officer, Chief Medical Officer, ADMA  
Lucy DeMario, PhD, Senior Director, Quality, ADMA  
Adam Grossman, President & CEO, ADMA  
Kaitlin Kestenberg, Director of Program Management, Clinical Operations, ADMA  
Diane P. Myers, Regulatory Consultant, Malvern Consulting Group (MCG)  
Gerri Henwood, Development Consultant, MCG  
Randall Mack, Development Consultant, MCG  
Alex Freyer, PharmD, Development Consultant, MCG  
(b) (4), Statistical Consultant

### Discussion Summary:

1. Adverse events associated with the product lot that exhibited visual appearance issue will be analyzed and may pose potential safety concerns. The significance of the safety analyses is still under review.
2. The current thinking of the review committee is that a *Risk Evaluation and Mitigation Strategy* (REMS) would not be required. However, additional pharmacovigilance activities may be recommended.
3. The current thinking of the review committee is that this BLA will not be presented at the *Blood Products Advisory Committee* meeting.
4. Information requests (IRs) issued, but with responses from ADMA still pending:
  - FDA IR issued on January 5, 2016 with ADMA's response due by January 22, 2016
  - FDA IR issued on January 8, 2016 with ADMA's response due by January 29, 2016
  - FDA IR issued on January 11, 2016 with ADMA's response due by January 29, 2016

- FDA IR issued on January 14, 2016 with ADMA's response due by January 22, 2016
  - FDA IRs (2) issued on January 15, 2016 with ADMA's response due by January 29, 2016
5. The review is ongoing, and additional requests for information may be issued in the near future as the need arises.
  6. ADMA and FDA agreed to have the *Late-Cycle Meeting* on Wednesday, April 13, 2016 from 1 PM to 2 PM via teleconference.
  7. The action due date for this BLA is Saturday, July 30, 2016.

**Additional Discussions:**

8. ADMA asked if it would be possible to have a teleconference with FDA before January 29, 2016 for discussion regarding the request to exclude any references to (b) (4) from the package insert and drug product release specifications.

FDA asserted that it is not feasible to have a meaningful discussion on this topic if ADMA does not provide comprehensive and detailed preclinical information package in response to the information request in question. FDA would also need adequate time allotted for thorough review of such response by various managers up the chain of command. A decision whether to meet for further discussion in this regard will not be made until ADMA's response package has been properly vetted by upper managers in the Office of Blood Research and Review.

ADMA agreed to submit their response by January 29, 2016.

9. ADMA asked for a current status on the need for pre-approval inspection. FDA deferred the response to the Division of Manufacturing and Product Quality (DMPQ) within Office of Compliance and Biologics Quality and advised them to wait for future notifications directly from DMPQ regarding the next step.