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09 October 2020

Division of Non-malignant Hematology
Office of Cardiology, Hematology, Endocrinology and Nephrology
Center for Drug Evaluation and Research
Food and Drug Administration
5901-B Ammendale Road
Beltsville, MD 20705-1266

Attn: Charlene Wheeler, Chief of Project Management Staff

Re: Bevyxxa® (betrixaban)
NDA 208383, SN0147
RESPONSE TO PREA NON-COMPLIANCE LETTER

Dear Charlene:

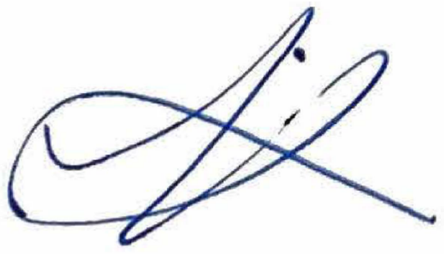
Reference is made to Portola Pharmaceuticals, Inc.'s (Portola's) NDA 208383 for Bevyxxa® (betrixaban) that was approved on 23 June 2017.

Please find enclosed Portola's response to the PREA Non-compliance Letter. Please note that we are requesting a deferral extension within this response.

Portola submitted Protocol Amendment #2 for PMR 3229-1 (Study 16-021) in SN0250 to IND 072679.

If you have any questions, please contact me by telephone (mobile: 707-333-0074), e-mail (Iain.Smith@alexion.com), or facsimile (650-246-7768).

Sincerely,



Iain Smith
Associate Director, Regulatory Affairs

1.11.3 CLINICAL INFORMATION AMENDMENT

Response to the notification of Non-Compliance with PREA, NDA 208383

Portola is hereby responding to the Food and Drug Administration (FDA) letter, issued 14 August 2020, under Section 505B(d)(1) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) [21 U.S.C. 355c(d)(1)] concerning Non-Compliance with PREA for NDA 208383, Bevyxxa® (betrixaban) capsules, 40 mg and 80 mg.

Portola has exercised due diligence in attempting to effect timely provision of the pediatric assessment for PMR 3229-1.

Due to significant delays in approval of (b) (4), very slow enrollment for the Part 1 pediatric cohort, and the challenges inherent to enrollment of acutely ill pediatric patients who require VTE prophylaxis, it became apparent to Portola that timely completion of PMR 3229-1 would be difficult. To this end, from December 2019 through March 2020, Portola initiated discussion with the Agency in regard to the ongoing feasibility (and utility) of completing PMR 3229-1 and PMR 3229-2 and 3229-3.

As embodied in the Notice of Permanent Discontinuance of Manufacturing in April 2020, Portola had decided to withdraw Bevyxxa® (betrixaban) capsules, 40 mg and 80 mg from the market for independent business reasons. From April through August 2020, Portola repeatedly sought Agency guidance on the correct path for cessation of the PMR commitments, in light of the withdrawal of Bevyxxa® from the market.

In August 2020, the Agency acknowledged Portola's voluntary request to withdraw the NDA for Bevyxxa, referencing Portola's Notice of Permanent Discontinuance of Manufacturing from April 2020. Portola was also then made aware of the letter of Notification of Non-Compliance with PREA, to which this letter is responsive.

DEFERRAL EXTENSION REQUESTED

Portola anticipates that the abbreviated CSR, with the available information for PMR 3229-1, will be finalized no later than December 15, 2020. Portola therefore requests deferral of the submission of this abbreviated CSR for PMR 3229-1 to December 15, 2020.