

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

761225Orig1s000

OTHER ACTION LETTERS



BLA 761225

COMPLETE RESPONSE

Hugel, Inc
c/o Strategic Drug Development Services, LLC
Attention: Scott A. Oglesby, PhD
Authorized U.S. Agent for Hugel, Inc
6518 Green Rise Road
Hillsborough, NC 27278

Dear Dr. Oglesby:

Please refer to your biologics license application (BLA) dated and received March 31, 2021, and your amendments, submitted under section 351(a) of the Public Health Service Act for letibotulinumtoxinA injection.

We acknowledge receipt of your amendment dated October 6, 2022, which constituted a complete response to our March 31, 2022, action letter.

We have completed our review of this application, as amended, and have determined that we cannot approve this application in its present form. We have described our reasons for this action below and, where possible, our recommendations to address these issues.

FACILITY INSPECTIONS

- (1) During a recent inspection of the Hugel, Inc. (FEI 3012163998) manufacturing and testing facility of drug substance and drug product for this application, our field investigator conveyed deficiencies to the representative of the facility. Satisfactory resolution of these deficiencies is required before this application may be approved.

PRESCRIBING INFORMATION

- (2) We reserve comment on the proposed labeling until the application is otherwise adequate. We encourage you to review the labeling review resources on the Prescription Drug Labeling Resources¹ and Pregnancy and Lactation Labeling Final Rule² websites, including regulations and related guidance documents and

¹ <https://www.fda.gov/drugs/laws-acts-and-rules/prescription-drug-labeling-resources>

² <https://www.fda.gov/drugs/labeling-information-drug-products/pregnancy-and-lactation-labeling-drugs-final-rule>

the Selected Requirements for Prescribing Information (SRPI) – a checklist of important format items from labeling regulations and guidances.

CARTON AND CONTAINER LABELING

- (3) We reserve comment on the proposed labeling until the application is otherwise adequate.

PROPRIETARY NAME

- (4) Please refer to correspondence dated, December 28, 2022, which addresses the proposed proprietary name, Letybo. This name was found acceptable pending approval of the application in the current review cycle. Please resubmit the proposed proprietary name when you respond to the application deficiencies.

SAFETY UPDATE

When you respond to the above deficiencies, include a safety update as described at 21 CFR 314.50(d)(5)(vi)(b). The safety update should include data from all nonclinical and clinical studies/trials of the product under consideration regardless of indication, dosage form, or dose level.

- (1) Describe in detail any significant changes or findings in the safety profile.
- (2) When assembling the sections describing discontinuations due to adverse events, serious adverse events, and common adverse events, incorporate new safety data as follows:
 - Present new safety data from the studies/clinical trials for the proposed indication using the same format as in the original submission.
 - Present tabulations of the new safety data combined with the original application data.
 - Include tables that compare frequencies of adverse events in the original application with the retabulated frequencies described in the bullet above.
 - For indications other than the proposed indication, provide separate tables for the frequencies of adverse events occurring in clinical trials.
- (3) Present a retabulation of the reasons for premature trial discontinuation by incorporating the drop-outs from the newly completed trials. Describe any new trends or patterns identified.

- (4) Provide case report forms and narrative summaries for each subject who died during a clinical trial or who did not complete a trial because of an adverse event. In addition, provide narrative summaries for serious adverse events.
- (5) Describe any information that suggests a substantial change in the incidence of common, but less serious, adverse events between the new data and the original application data.
- (6) Provide updated exposure information for the clinical studies/trials (e.g., number of subjects, person time).
- (7) Provide a summary of worldwide experience on the safety of this product. Include an updated estimate of use for product marketed in other countries.
- (8) Provide English translations of current approved foreign labeling not previously submitted.

ADDITIONAL COMMENTS

We have the following comments/recommendations that are not approvability issues:

PRODUCT QUALITY



(b) (4)



MICROBIOLOGY

(b) (4)



(b) (4)



OTHER

Within one year after the date of this letter, you are required to resubmit or take other actions available under 21 CFR 601.3(b)). If you do not take one of these actions, we may consider your lack of response a request to withdraw the application under 21 CFR 601.3(c). You may also request an extension of time in which to resubmit the application.

U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov

A resubmission must fully address all the deficiencies listed in this letter and should be clearly marked with "**RESUBMISSION**" in large font, bolded type at the beginning of the cover letter of the submission. The cover letter should clearly state that you consider this resubmission a complete response to the deficiencies outlined in this letter. A partial response to this letter will not be processed as a resubmission and will not start a new review cycle.

You may request a meeting or teleconference with us to discuss what steps you need to take before the application may be approved. If you wish to have such a meeting, submit your meeting request as described in the draft guidance for industry *Formal Meetings Between the FDA and Sponsors or Applicants of PDUFA Products*.

The drug product may not be legally marketed until you have been notified in writing that this application is approved.

If you have any questions, call H. F. Van Horn III, PharmD, MBA, Regulatory Project Manager, at (301) 837-7389.

Sincerely,

{See appended electronic signature page}

Julie G. Beitz, MD,
Director
Office of Immunology and Inflammation (OI)
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

JULIE G BEITZ
04/12/2023 01:53:00 PM



BLA 761225

COMPLETE RESPONSE

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Facility Inspection

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Microbiology

(b) (4)

(b) (4)

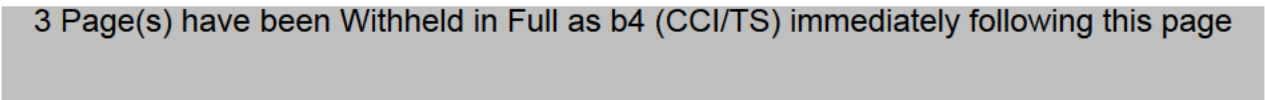


Product Quality

(b) (4)



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PRESCRIBING INFORMATION

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Rule² websites, including regulations and related guidance documents and the Selected Requirements for Prescribing Information (SRPI) – a checklist of important format items from labeling regulations and guidances.

If you revise labeling, use the SRPI checklist to ensure that the Prescribing Information conforms with format items in regulations and guidances. Your response must include updated content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format as described at FDA.gov.³

CARTON AND CONTAINER LABELING

15. We reserve comment on the proposed labeling until the application is otherwise adequate.

MEDICATION GUIDE

16. Add the following bolded statement or appropriate alternative to the carton and container labeling per 21 CFR 208.24(d): **"ATTENTION PHARMACIST: Each patient is required to receive the enclosed Medication Guide."**

PROPRIETARY NAME

17. The proposed proprietary name, Letybo, was found conditionally acceptable pending approval of the application in the current review cycle. Resubmit the proposed proprietary name when you respond to the application deficiencies.

SAFETY UPDATE

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² <https://www.fda.gov/drugs/labeling-information-drug-products/pregnancy-and-lactation-labeling-drugs-final-rule>

³ <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

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(b) (4)



Product Quality

(b) (4)



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(b) (4)



Immunogenicity

(b) (4)



OTHER

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Julie G. Beitz, MD,
Director
Office of Immunology and Inflammation (OI)
Center for Drug Evaluation and Research

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/s/

JULIE G BEITZ
03/31/2022 12:58:15 PM