

DEPARTMENT OF BEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration Rockville, MD 20857

NDA 21-520/S-012

Ell Lilly & Company
Attention: Robin Pitts Wojcicszek, R.Ph.
Associate Director, U.S. Regulatory Affairs
Lilly Corporate Center
Indianapolis, IN 46285

Dear Ms. Wojcieszek:

Please refer to your supplemental new drug application dated September 28, 2006, received September 29, 2006 submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Symbyax (olanzapine/fluoxetine) 3 mg/25 mg, 6 mg/25 mg, 6 mg/50 mg, 12 mg/25 mg, and 12 mg/50 mg (mg equivalent olanzapine/mg equivalent fluoxetine) capsules.

We acknowledge receipt of your amendments dated November 8, 28, 2006, December 11, 14, 2006, and February 5, 20, 2007.

This supplemental new drug application provides for the use of Symbyax (olanzapine/fluoxetine) capsules for Treatment Resistant Depression (TRD).

We completed our review of this application, and it is approvable. Before the application may be approved, however, you must address the following issues:

Updated Information on Risks of Weight Gain, Hyperglycemia, and Hyperlipidemia

A primary concern with this application and the primary basis for our not taking a final action is our view that we lack important safety information needed to adequately update the labeling with all relevant risk information. In particular, we are concerned that the labeling is deficient with regard to information about weight gain, hyperglycemia, and hyperlipidemia that is associated with olanzapine use, whether taken alone or in combination with fluoxetine. You must fully address these concerns before we will be able to take a final action on this application.

Defining what your response will need to be to fully address these concerns will likely involve an interactive process with us over a period of several weeks, because we, first of all, need to fully understand the universe of relevant olanzapine and olanzapine/fluoxetine combination (OFC) studies and their characteristics. Once we better understand this set of studies and what data pertinent to our concerns were collected, we will be in a better position to provide detailed advice on what studies to pool, what data to provide, and what additional analyses to conduct. In characterizing these trials, it will be important to provide details on what data were collected (e.g., plasma glucose, HbA1c, total cholesterol, HDL, LDL, triglyceride, and urine glucose), under what conditions (e.g., fasting vs non-

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 8 2007

NDA 21-520/S-012 Page 2

fasting), the demographic characteristics of the subjects (e.g., pediatric vs adult), and at what intervals.

Once we have this information, we will work with you to define what studies to pool, and what data to provide to us and in what format.

Regarding data displays, an overall strategy will be to subgroup patients on the basis of their status at baseline so that clinicians can better understand the risks associated with treatment of patients falling into different risk categories. For example, we note that your proposed Symbyax label includes information only on proportions of patients who are relatively normal at baseline with regard to random blood glucose (< 140 mg/dL), i.e., 2.9% of such patients receiving OFC had on-treatment levels \geq 200 mg/dL compared to 0.3% of placebo-treated patients. However, we note that 46% of patients who were borderline to high at baseline (140 to 200) had such on-treatment levels compared to only 5% of placebo-treated patients. This latter finding was based on a small number of patients in the OFC program, and for this reason, we would like to see such data for the entire clanzapine program. In addition, we were troubled that this important finding was not included in your proposed label. We will want you to provide similar information based on subgroupings of patients on the basis of weight and BMI (for weight change), and lipid findings for the lipid data. We will want you to provide data both on proportions of patients meeting certain on-treatment criteria and also for mean change from baseline.

If you feel you have already aggregated and submitted data to address these concerns, then we ask that you direct us to precisely which submissions these are. If, on the other hand, you have aggregated the appropriate data for your own internal purposes but not submitted them, we ask you to submit them. Your recent February 20, 2007 response to our January 12, 2007 letter regarding the New York Times story has not been particularly helpful in addressing these concerns.

Our overall goal is to improve labeling with regard to these findings so that clinicians will be better informed on what the risks are for their patients. They cannot make reasonable treatment decisions until they have such information. We do not feel that current labeling for either Symbyax or Zyprexa, provides sufficient information on these risks, and we fully intend to insure that these labels are enhanced with the best available information to characterize these risks.

Post Marketing Commitments

Long-Term Efficacy Studies

Since TRD is a chronic illness, you are required to assess the longer-torm effectiveness and safety of Symbyax in TRD. Accordingly, we ask for your commitment to submit, as a Postmarketing commitment, the results of this study to evaluate Symbyax's ability to reduce the risk of relapse in acutely remitted patients with TRD. We ask that you commit to submitting these results no later than 3 years after the date of approval of this supplemental application.

Labeling

Please submit revised draft labeling for the drug. The labeling should be identical in content to the enclosed labeling text for the package insert.

In addition, all provious revisions, as reflected in the most recently approved package insert, must be included. To facilitate review of your submission, provide a highlighted or marked-up copy that shows the changes.

Exhibit A, Page 3 of 36

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments

Case No. 3AN-06-5630 CI

MAR 2 8 2007

G. Brophy

Unsealed in Alaska v. Lilly 3AN 06-5630 CIV

NDA 21-520/S-012 Page 3

If additional information relating to the safety or effectiveness of this drug becomes available, revision of the labeling may be required.

Foreign Regulatory Update/Labeling

We require a review of the status of all Symbyax actions taken or pending before foreign regulatory authorities. Approval actions can be noted, but we ask that you describe in detail any and all actions taken that have been negative, supplying a full explanation of the views of all parties and the resolution of the matter. If Symbyax has been approved by any non-US regulatory bodies, we ask that you provide us any approved labeling for Symbyax along with English translations when needed.

Request for Safety Update and World Literature 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 non-clinical and clinical studies of the drug under consideration regardless of indication, dosage form, or dose level.

- 1. Describe in detail any significant changes or findings in the safety profile.
- 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 for the proposed indication using the same format as the original NDA submission.
 - · Present tabulations of the new safety data combined with the original NDA data.
 - Include tables that compare frequencies of adverse events in the original NDA 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.
- Present a retabulation of the reasons for premature study discontinuation by incorporating the drop-outs from the newly completed studies. Describe any new trends or patterns identified.
- 4. Provide case report forms and narrative summaries for each patient who died during a clinical study or who did not complete a study 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 NDA data.
- 6. Prior to an approval action, we require an updated report on the world's archival literature pertaining to the safety of Symbyax. Please provide a summary of worldwide experience on the safety of this drug. Include an updated estimate of use for drug marketed in other countries. This report should include only literature not covered in your previous submissions. We will need your warrant that you have reviewed this literature systematically, and in detail, and that you have discovered no finding that would adversely affect conclusions about the safety of Symbyax. The report should also detail how the literature search was conducted, by whom (their credentials) and whether it relied on abstracts or full texts (including translations) of

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 & 2007

NDA 21-520/S-012 Page 4

articles. The report should emphasize clinical data, but new findings in preclinical reports of potential significance should also be described. Should any report or finding be judged important, a copy (translated as required) should be submitted for our review.

Promotional Materials

In addition, submit three copies of the Introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this division and two copies of both the promotional materials and the package insert directly to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

Within 10 days after the date of this letter, you are required to amend the application, notify us of your intent to file an amendment, or follow one of your other options under 21 CFR 314.110. If you do not follow one of these options, we will consider your lack of response a request to withdraw the application under 21 CFR 314.65. Any amendment should respond to all the deficiencies listed. We will not process a partial reply as a major amendment nor will the review clock be reactivated until all deficiencies have been addressed.

Under 21 CFR 314.102(d), you may request a meeting or telephone conference with the Division of Psychiatry Products to discuss what further steps need to be taken before the application may be approved.

If you have any questions, call LCDR Renmeet Grewal, Pharm.D., Regulatory Project Manager, at (301) 796-1080.

Sincerely, .

(See appended electronic signature page)

Thomas Laughren, M.D.

Director

Division of Psychiatry Products

Office of Drug Evaluation I

Center for Drug Evaluation and Research

Enclosure

MAR 2 8 2007

G. Brophy

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

15:07 MAR-28-2007

This version of labeling is based up on the version submitted with the application. We have used track changes to Indicate our additions and deletions. We have added bracketed comments to explain our actions where needed.]

HIGHLIGHTS OF PRESCRIBENC INFORMATION

These highlights do not include all the information needed to use Symbyas safely and effectively, See Is a prescribing information for Symbysz.

SYMBYAX" (olsexapine and fluescine HCI capaths) for orel administration Inhiai U.S. Approval: 2003

WARNING

See full prescribing information for complete boxed warning. SUICIDALITY IN CHILDREN AND ADDLESCENTS:

- increased risk of swiciful thinking and behavior in children and adolescent toking autidenterants for major description dimerder (ADD) and other psychiatric disorders, Not approved for was in children and adolescents
- INCREASED MORTALITY IN ELDERLY PATIENTS: forcemed meriality in elderty patients with dements refuted psychests compared to piecebo. Not approved for the trestment of patients with dementia-related psychools.

SUBSTRAILED: IN CHILDREN AND ADOLKICENTY electroned risk of miridel thinking and believed to children and udolescent taking antideparaments for anojer depressive Giacries (MDD) and other psychiatric disorders. Not approved for act to children and adolescents.

DUCTERY	MILIOD	FHAR	mee.
-RECENT	MANAGEM	L. PLAI	U-0-

Warrings and Presentions, Minsty in payons with Specialis colored perchait(F.1) HOLLOUS Contraindications. Pimozide (4) 3/2006 Warnings and Preceutions, Hopotobiliary events (5.14) 4/2006 Warnings and Precautions, Scrotonin Syndrome (5.6) 8/2006 Warnings and Practiculous Weight Grip

Warnings and Precautions, Rok of Glucox Dyrecoulation

Warning and Processory I Ivneripidents

SYMBYAX combines of entapine, a psychotropic agent belonging to the dienobenzodiosepine class, and fluoretine, a relective scrotonin reuptake inhibitor, indicated for treatment of.

Depressive opisodos associated with bipolar disorder (1 1)

- Treatment Resistant Depression (major depressive disorder in patients who do not respond to 2 antidepressents of adequate dose and duration in the current episode) (1.2)
- DOSAGE AND ADMINISTRATION-Once deily in the evening generally beginning with 6 mg/25 mg (2)
- Escalace dose cautiously in patients predisposed to hypotentive reactions, hopatic impairment, or with potential for slowed metabolism (2 3)

Discontinue gradually (2.4)

- The safety of doses above 18 mg plantapine with 75 mg fluoratine has not been evolusted in clinical trials.
- DOSAGE FORMS AND STRENGTHS-Capsules: 3 mg/25 mg 6 mg/25 mg, 6 mg/50 mg, 12 mg/25 mg, and 12 mg/50 mg (mg aquivalent olenzapine/mg equivalent fluozoline) (3)
- CONTRAINDICATIONS Do not use with an MAOI or within 14 days of discontinuing an MAOI. At lean 5 weeks should be allowed after stopping 5YMBYAX before starting treatment with an MAOI (4, 7 13) Do not use with Pimozide (4, 7,15)

Do not use with Thioridazine. Do not use Thioridazine within 5 weeks of discontinuing SYMBYAX (4, 7.11)

-WARNINGS AND PRECAUTIONS-

Patients should be monitored for clinical worsening and suscidal thinking and behavior (5 2)

Cerebravascular adverse events including fattlaire were reported more commonly with olanzapine than placebe in trials of cliderly parient with demantu-related psychosis (5 3)

Neurolepite Malignam Syndrome has been reported with atypical antiptychotics (5.4)

ISOE Approvable Letter for justimentine requested for

hyperelycemia stellogs.

- Hyperstycemus in some cases extreme and associated with knowledges or hyperosmolar come or death, has been repented in patients taking otypical antiptychotics, including clansapins along as well as charaspine taken concomitantly with Augustine Disbette patients should be monliared regularly for worrening of glucose connot. Patients with ruk Retors for disbeter should undergo fasting blood glucose testing at the beginning of and periodically during treament. Manitor all patients for symptoms of hyperglycemus. (5 5)
- Hyperinidemia limera appropriate warriag here, see Approvable Laster

Clinically significant worth earn may occur.

- Scrotonip Syndrome may occur with SYMBYAX (5.6)
- Discontinue upon appearance of resh or affergic phenomena (5,7)
- Screen for bipolar disorder and montat for mania hypomenia (3.8)
- Tardive Dyskincais may develop scutely or chanically (5 9)
- Orthostatic hypotension associated with distinct achycaldia. bradycardin, and in some patients, syndope may occur, especially during initial dose tivation. Use causion in patients with cardiovascular disease. cerebrovescular discue, and mose conditions that could affect homodynamia responses (5.10)

Use caucionally in patients at rick for expiration preumonia due to esophageal dyamoulity (5 11)

Use reuniously in patients with a history of seizures or with conditions that potentially lower the seizure threshold (5.12)

Charally sign from weight pole too, on wiff 12)

- Asymptometic elevations of hopstic transaminascs and alkaling phosphatase have been observed with claningline, Periodic assessment recommended in patients with hepsile discours (5.16)
- May increase the risk of bleeding. Use with NSAIDs or crues that affect coagulation may potentiate the risk of percointestinal or other bleeding (5.15)
- Hyponeuremia (some cases with serum sodium lower than 110 mmoVL) possibly associated with the syndrome of inappropriate antidiuretic hormone (SIADH) have been reported with fluoretine (5.16)
- Has potential to impair judgment, thinking and motor skills (5.17)

May disrupt temperature regulation (5.18)

- Due to anicholinergie activity, the with contion in petients with clinically algulicant promitic hypertrophy, narrow angle glaucoma, or a history of paralytic fleus or related conditions (5.19)
- Use a lower dose in patients with clirtosis (5.19)

May elevate prolactin levels (5.20)

Use courion when prescribing with other products containing plantapine. and/or fluogerine as active ingredients (i.e., Zypress, Prozec, Sarafem) (5.21)

Pluosetine has a long climination half-life (5.22)

Monitor when ducontinuing treatment since discontinuation symptoms may occur (5 27)

ADVERSE REACTIONS.... Most common adverse events (25% and at least twice that for placebo) are disturbance in erection, dry mouth ferigue, hypersonnia, increased appetito, peripheral edema, sedation, commolence, tremot, vision blurred, and weight increased (6.1)

TO PEPON SUSPECTED ADVERSE REACTIONS, COMMIN LINY BY 1-800. SAS-3979 OF FDA at 1.200-FDA-1088 OF more fee governed with

DRUG INTERACTIONS Antihypen murves - enhanced antihypenomive effect (7.1)

Anti-Perkinsonian - may antagonine fevodops/dopamina agomita (7 2)

Exhibit A, Page 6 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 E 2007 G. Brophy

- Bermodiarepines may potentiate orthogratic hypotention and sedation
- Carbamazapino povential for cirvated carbamazapino levela (7.5)
- Closepine may closes Closepine levels (7.6).
- CNS Acting Drup Leukon should be used when taken in combination with other occordity setting drugs and alcohol (7.7)
- Emand may poterwise secution and orthograde hypotension (7.9)
- Fluverageins may doubte of enzapine levels (7.10)
- Haloperidal etevated halopendal levels have been observed (7.11)
- Lithium monitor lithium levels (7 12)
- Phenytoin potential for cirvated photyloin levels (7.14)
- Serotonergic drugs potential for Serotonin Syndrome (56, 7.16, 7.20)
- Trioyelic antidepressants (PCAs) monitor TCA levels (7.19)
- Warfarin increase monrooming with SYMBYAX dose change (7,23)
- Drugo that interfers with hemostatis (NSAIDs, suplin, warfarin, etc.) may potentiate the rule of blesoing (7.24)
- Fluoretine is an inhibitor of CYP4502D6 arayme pathway (7 25)
- Oruga tightly bound to plasme proteins, may cause shirt in plasme concentrations (7.29)

-USE IN SPECIFIC POPULATIONS

- . Preprency: SYMBYAX should be used during pregnancy only if the potential benefit justified the potential risk to the fetus (8.1)
- · Nursing mothers, breast feeding is not recommended (1.3)

See 17 DE PATIENT COUNSELING INPORMATION sed FDAapproved potter labeling.

Revbed: [9/2006]

192

(BNL38IJA)MP)

MAR 2 8 2007 G. Brophy

Exhibit A, Page 7 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

P.08/23

FULL PRESCRIBING INFORMATION: CONTENTS.

Licetion reference aumbers man be re-ordered to re-ent charette. heth here and in the hody of the document!

WARNING - INCREASED MORTALITY IN ELDERLY PATIENTS and SUICIDALITY IN CHILDREN AND ADOLESCENTS

- I . INDICATIONS AND USAGE
 - 1.1 Bipole Depression
 - 1.2 Troumont Resistant Depretsion
- Z DOSAGE AND ADMINISTRATION
 - 2.1 Bipole Depression
 - 2.2 Treatmont Resistant Depression
 - 2.3 Special Populations
 - 2.4 Discontinuation of Treatment with SYMBYAX
- DOGAGE FORMS AND STRENGTES
- CONTRAINDICATIONS
- 5 WARNINGS AND PRECAUTIONS
 - 5.1 Increased Montality in Elderly Petients with Dementia-Related Prychotile
 - 5,2 Clinical Worsening and Suicide Risk
 - 5.3 Carebrovencular Advance Events (CVAE), Including Stroke, in Elderly Petients with Dementia-Related Psychotta
 - 5.4 Neuroleptic Melignant Syndrome (NMS)
 - 5.5 Hyperglycemia and Diabetes Mellinus
 - Hypotinidema West'n Grin
 - 56 Sermonin Syndrame
 - 5.7 Allergic Byents and Rath
 - 5.8 Screening Patients for Bipolar Disorder and Monitor for Manie/Hypomania
 - 5.9 Tardivo Dyskinesia

 - 5.10 Onhostetic Hypotension
 - 5.11 Dysphagia
 - 5.12 Sciences
 - S.L.) Waight Corn
 - 5,14 Transaminose Elevasions
- 5.15 Abnormal Blooding
- 5.16 Нуропавтина
- 5.17 Cognitive and Meter Impairment
- 5.18 Body Temperature Regulation
- 5.19 Use in Patients with Concominant Illness
- 5 20 Hyperprotectinemia
- 5.21 Concernium Uso of Olerunpine and Flyanciae Products
- 5.22 Long Helf-Life of Fluoretine
- 5.23 Discontinuation of Treatment with SYMBYAX
- 5 24 Laboratory Tora
- 6 ADVERSE REACTIONS
- 6.1 Clinical Trials Expensions 7 DRUGINTERACTIONS

 - 7.1 Antihypenensive agents 7.2 Anti-Parkinsonion
 - 7.3 Benzodiazepines

- 7.6 Biperiden
- 7.5 Carbamazapine
- 76 Clozapine
- 7.7 CNS Acting Drugs
- 78 Electrosophuline therapy (ECT)
- 7.9 Ethanol
- 7.10 Pluvoxemine
- 7 11 Heloperidol
- 7.12 Lunium
- 7.13 Monoamine oxidase inhibitors
- 7.14 Throyloin
- 7.15 Pimoxide

- 7.16 Scrotenerge drugs
- 7.17 Thoophylline
- 7 18 Throridazine
- 7.19 Tricyclic antidepressants (TCAs)
- 7.20 Triptana
- 7 21 Tryptophen
- 7.22 Velprosie
- 7.33 Warfarin
- 7 26 Drugs that interfere with homostatis (NSAID), aminn, worlding etc.)
- 7.25 Drugs metabolized by CYP2D6
- 7.26 Drugs metabolized by CYPJA
- 7 27 Effect of olanzapino on drugs metabolized by other CYP enzymes
- 7 28 The offect of other drugs on plantapine
- 7.29 Drugs tightly bound to plasma proteins
- USE IN SPECIFIC POPULATIONS
 - I.I Pregnancy
 - 8.2 Labor and Delivery
 - Nursing Mothers
 - 14 Poquero Uso
 - 8.5 Gerietric Use
- DRUG ABUSE AND DEPENDENCE
- 93 Dependence ID OVERDOSAGE
 - 101 Management of Overdox
 - DESCRIPTION
- CLINICAL PHARMACOLOGY
 - 121 Mechanism of Action
 - 122 Pharmacodynamics
 - 12.3 Pharmacokinetics.
 - 12.4 Special Populations
- 13 NONCLINICAL TOXICOLOGY
- 13.1 Carcinogenesis, Mussganisis, Impairment of Ferning
- 14 CLINICAL STUDIES
 - 14.1 Bipolar Depression
- 16.2 Ticalment Resistant Depression
 16 HOW SUPPLIED/STORAGE AND HANDLING 17 PATIENT COUNSELING INFORMATION
 - Information for Patients
 - Clinical Wersening and Suicide Risk
- Scrolanin Syndromo
- FDA approved Medication Guide

Exhibit A, Page 8 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

[&]quot;Sections of subsections omitted from the full prescribing information are not

FULL PRESCRIBING INFORMATION

WARNING

Sulcidality in Children and Adolescents — Antidepressants increased the risk of suicidal thinking and behavior (suicidality) in short-term studies in children and adolescents with major depressive disorder (MDD) and other psychiatric disorders. Anyone considering the use of SYMBYAX or any other notidepressant in a child or adolescent must balance this risk with the clinical need. Patients who are started on therapy should be observed closely for clinical worsening, suicidality, or unusual changes in behavior, Families and caregivers should be advised of the need for close observation and communication with the prescriber, SYMBYAX is not approved for use in padiatric patients. [See Warnings and Precautions (5.2) and Use in Specific Populations (8.4)].

Pooled analyses of short-term (4 to 16 weeks) placebo-controlled trials of 9 antidepressant drugs (SSRIs and others) in children and adolescents with major depressive disorder (MDD), obsessive compulsive disorder (OCD), or other psychiatric disorders (a total of 24 trials involving over 4400 patients) have revealed a greater risk of adverse events representing suicidal thinking or behavior (suicidality) during the first few months of treatment in those receiving antidepressants. The average risk of such events in patients receiving antidepressants was 4%, twice the placebo risk of 2%. No suicides occurred in these trials. [See Warnings and Precoutions (5.2)].

Increased Mortality in Elderly Patients — Elderly patients with dementia-related psychosis treated with atypical autipsychotic drags are at an increased risk of death compared to placebo. Analyses of seventeen placebo-controlled trials (modal duration of 10 weeks) in these patients revealed a risk of death in the drug-treated patients of between 1.6 to 1.7 times that seem in placebo-treated patients. Over the course of a typical 10-week controlled trial, the rate of death in drug-treated patients was about 4.5%, compared to a rate of about 2.6% in the placebo group. Although the causes of death were veried, most of the deaths appeared to be either cardiovascular (e.g., heart failure, sudden death) or infections (e.g., pneumonis) in nature. SYMBYAX (classapine and fluoxetine HCI) is not approved for the treatment of patients with dementia-related psychosis [see Warnings and Precautions (S.1)].

Emicidality in Children and Adalmeents—Antidepressents Increased the rish of suicidal thinking and behavior (suicidality) in short term studies in children and adelessants with major depressive disorder (MDD) and other psychiatric disorders. Anyone considering the use of SVMBYAX or any other natidepressant in a child are adolessent must bulence this risk with the clinical accid. Patients who are started on therapy about the observed classly for alinical wavening, suicidality, or unusual changes in behavior. Families and correlater should be advised of the need for close observation and communication with the preseribes. SVABYAX is not approved for use in pediatric patients. (See Warnings and Preconflows (5.3) and the in Specific Papulations (8.4)).

Pooled unalyses of short term (4 to 16 weeks) placebe controlled trials of 9 antidepresson drags (ESIUs and others) in children and adolescents with major depressive disorder (MDD), obscoire compulsive disorder (OCD), or other psychiatric disorders (a total of 24 trials involving over 1400 patients) have revealed a greater vick of advance events representing suicidal thinking or behavior (minidality) during the first few menths of treatment in those receiving antidepressants. The average risk of such avents in poticula receiving antidepressants was 124 swice the placebu risk of 244. No exteldes ancurred in these trials, (500 Warnings and Precontions (5.2)).

I INDICATIONS AND USACE

1.1 Bipolar Depression

SYMBYAX is indicated for the treatment of depressive episodes associated with bipolar disorder.

Unlike with unipolar depression, there are no established guidelines for the length of time patients with bipolar disorder experiencing a major depressive episode should be treated with agents containing antidepressant drugs.

The effectiveness of SYMBYAX for maintaining antidepressant response in this patient population beyond 8 weeks has not been established in controlled clinical studies. Physicians who elect to use SYMBYAX for extended periods should periodically recevaluate the benefits and long-term risks of the drug for the individual patient.

1.2 Treatment Resistant Depression

SYMBYAX is indicated for treatment resistant depression (major depressive disorder in patients who do not respond to 2 antidepressants of adequate dose and duration in the current episode) [see Clinical Studius (14,2)].

The effectiveness of SYMBYAX for maintaining antidepressant response in this patient population beyond 8 weeks has not reevaluate the benefits and long-term risks of the drug for the individual patient.

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI MAR 2 8 2007

DOSAGE AND ADMINISTRATION

Bipolar Depression 2.1

SYMBYAX should be administered once daily in the evening, generally beginning with the 6-mg/25-mg capsule. While food has no appreciable effect on the absorption of clanzapine and fluoxetine given individually, the effect of food on the absorption of SYMBYAX has not been studied. Dosage adjustments, if indicated, can be made according to efficacy and tolerability. Antidepressant efficacy was demonstrated with SYMBYAX in a dose range of clanzapine 6 to 12 mg and fluoxetine 25 to 50 mg [see Clinical Studies (14)].

The safety of doses above 18 mg/75 mg has not been evaluated in clinical studies.

2.1 Trestment Resistant Depression

SYMBYAX should be administered once daily in the evening, generally beginning with the 6-mg/25-mg capsule. While food has no appreciable effect on the absorption of clanzapine and fluoxetine given individually, the effect of food on the absorption of SYMBYAX has not been studied. Dosage adjustments, if indicated, can be made according to officecy and tolerability. Antidepressant efficacy was demonstrated with SYMBYAX in a dose range of olanzapine 6 to 18 mg and fluoretine 25 to 50 mg (see Clinical Studies (14)]. The safety of doses above 18 mg/75 mg has not been evaluated in clinical studies.

2.3 Special Populations

The starting dose of SYMBYAX 3 mg/25 - 6 mg/25 mg should be used for patients with a predisposition to hypotensive reactions, patients with hepatic impairment, or patients who exhibit a combination of factors that may slow the metabolism of SYMBYAX (female gender, geriatric age, nonsmoking status) or those patients who may be pharmacodynamically sensitive to olanzapine. When indicated, dose escalation should be performed with caution in these patients. SYMBYAX has not been systematically studied in patients over 65 years of age or in patients <18 years of age [see Warnings and Precautions (5.19). Use in Specific Populations (8.4 and 8.5), and Clinical Pharmacology (12.3)].

2.4 Discontinuation of Treatment with SYMBYAX

Symptoms associated with discontinuation of fluoxetine, a component of SYMBYAX, and other SSRIs and SNRIs, have been reported [see Warnings and Precautions (5.23)].

DOSAGE FORM AND STRENGTHS

Capsules (mg equivalent olanzapine/mg equivalent fluoxetine):

- 3 mg/25 mg
- 6 mg/25 mg
- 6 mg/50 mg
- 12 mg/25 mg
- 12 mg/50 mg

CONTRAINDICATIONS

The use of SYMBYAX is contraindicated with the following:

- Monoemine Oxidase Inhibitors (MAOI) [see Drug Interactions (7.13)]
- Piropride [see Drug Interoctions (7.15)]
- Thioridazine (see Drug Interactions (7.18))

5 WARNINGS AND PRECAUTIONS

5.1 Increased Mortellty in Elderly Patients with Domentin-Related Psychosis

Elderly patients with dementia-related psychosis treated with atypical antipsychotic drugs are at an increased risk of death compared to placebo. SYMBYAX is not approved for the treatment of patients with dementin-related psychosis (see Box

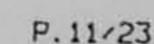
In clanzapine placebo-controlled clinical trials of elderly patients with dementia-related psychosis, the incidence of death in olanzapine-weated petients was significantly greater than placebo-treated patients (3.5% vs 1.5%, respectively).

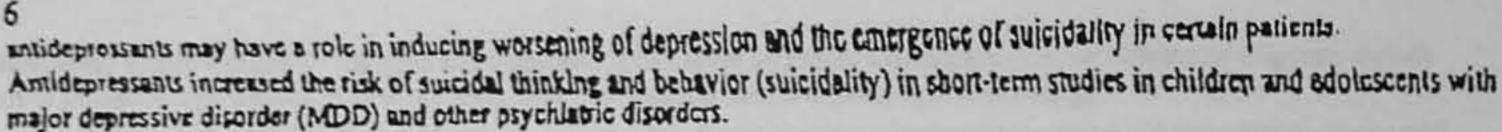
Clinical Worsening and Suicide Risk

Patients with major depressive disorder (MDD), both adult and pedintrio, may experience worsening of their depression and/or the emergence of suicidal ideation and behavior (suicidality) or unusual changes in behavior, whether or not they are taking antidepressant medications, and this risk may persist until eignificant remission occurs. There has been a long-standing concern that

MAR 2 8 2007

SOA Response to Lilly Motion in Limine Regarding Rece®, Brophy Exhibit A, Page 10 of 36 Case No. 3AN-06-5630 CI





Pooled analyses of short-term placebo-controlled trials of 9 antidepressant drugs (SSRIs and others) in children and adolescents with MDD, OCD, or other psychlatric disorders (a total of 24 trials involving over 4400 patients) have revealed a greater risk of adverse events representing suicidal behavior or thinking (suicidality) during the first few months of treatment in those receiving antidepressants. The average risk of such events in patients receiving antidepressants was 4%, twice the placebo risk of 2%. There was considerable variation in risk among drugs, but a tendency toward an increase for almost all drugs studied. The risk of suicidality was most consistently observed in the MDD trials, but there were signals of risk arising from some trials in other psychiatric indications (obsessive compulsive disorder and social anxiety disorder) as well. No suicides occurred in any of these trials. It is unknown whether the suicidality risk in pediatric patients extends to longer-term use, i.e., beyond several months. It is also unknown whether the suicidality risk extends to adults.

All pediatric patients being treated with natidepressants for any indication should be observed closely for clinical worsening, suicidality, and nousual changes to behavior, especially during the initial few months of a course of drug therapy, or at times of dose changes, either increases or decreases. Such observation would generally include at least weekly face-to-face contact with patients or their family members or caregivers during the first 4 weeks of treatment, then every other work visits for the next 4 weeks, then at 12 weeks, and as clinically indicated beyond 12 weeks. Additional contact by telephone may be appropriate between face-to-face visits.

Adults with MDD or co-morbid depression in the setting of other psychlatric illness being treated with notidepressants should be observed similarly for clinical worsaning and suicidality, especially during the initial few months of a course of drug therapy, or at times of dose changes, either increases or decreases.

The following symptoms, anxiety, agitation, panic attacks, insomnia, irritability, hostility, aggressiveness, impulsivity, akathisia (psychomotor restlessness), hypomania, and mania, have been reported in adult and pediatric patients being treated with antidepressants for major depressive disorder as well as for other indications, both psychlatric and nonpsychiatric. Although a causal link between the emergence of such symptoms and either the worsening of depression and/or the emergence of suicidal impulses has not been established, there is concern that such symptoms may represent precursors to emerging suicidality.

Consideration should be given to changing the therapeutic regimen, including possibly discontinuing the medication, in patients whose depression is persistently worse, or who are experiencing emergent suicidality or symptoms that might be precursors to womening depression or suicidality, especially if these symptoms are severe, abrupt in onset, or were not part of the patient's presenting symptoms.

If the decision has been made to discontinue treatment, medication should be tapered, as rapidly as is feasible, but with recognition that abrupt discontinuation can be associated with certain symptoms (see Warnings and Precautions (5.23) and Dorage and Administration (2.4), for a description of the risks of discontinuation of SYMBYAX).

Families and caregivers of pediatric patients being treated with antidepressants for major depressive disorder or other indications, both psychiatric and nonpsychiatric, should be alcried about the need to monitor patients for the emergence of agitation, irritability, unusual changes in behavior, and the other symptoms described above, as well as the emergence of suicidality, and to report such symptoms immediately to health care providers. Such monitoring should include daily observation by families and enregivers. Prescriptions for SYMBYAX should be written for the smallest quantity of capsules consistent with good patient management, in order to reduce the risk of overdose. Families and caregivers of adults being treated for depression should be similarly advised.

It should be noted that SYMBYAX is not approved for use in treating any indications in the pediatric population.

Cerebrovassular Adverse Events (CVAE), Including Stroke, In Elderly Patlents with Dementia-Related Psychosis 5.3

Cerebrovascular adverse events (e.g., stroke, transiont Ischemic attack), including fatalities, were reported in patients in trials of olanzapine in elderly patients with dementia-related psychosis. In placebo-controlled trials, there was a significantly higher incidence of cerebrovascular adverse events in patients treated with olanzapine compared to patients treated with placebo. Olanzapine and SYMBYAX are not approved for the treatment of patients with dementia-related psychosis.

Neuroleptic Malignant Syndrome (NMS)

A potentially fatal symptom complex sometimes referred to as NMS has been reported in association with administration of antipsychotic drugs, including ofanzapine. Clinical manifestations of NMS are hyperpyrexia, muscle rigidity, altered mental status, and evidence of autonomic instability (irregular pulse or blood pressure, tachycardia, diaphoresis, and cardiao dysrhythmia). Additional signs may include elevated creatinine phosphokinase, myoglobinurla (rhabdomyolysis), and acute renal failure.

The diagnostic evaluation of patients with this syndrome is complicated. In arriving at a diagnosts, it is important to exclude cases where the clinical presentation includes both serious medical illness (e.g., pneumonia, systemic infection, etc.) and ungreated or

> Exhibit A, Page 11 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 2 2007

3. Brophy

Unsealed in Alaska v. Lilly 3AN 06-5630 CIV

inadequately treated extrapyramidal signs and symptoms (EPS). Other important considerations in the differential diagnosis include central anticholinergic toxicity, heat stroke, drug fever, and primary central nervous system pathology.

The management of NMS should include: 1) immediate discontinuation of antipsychotic drugs and other drugs not essential to concurrent therapy, 2) intensive symptomatic treatment and medical monitoring, and 3) treatment of any concomitant serious medical problems for which specific treatments are available. There is no general agreement about specific pharmacological treatment regimens for NMS.

If after recovering from NMS, a parient requires treatment with an antipsychotic, the patient should be carefully monitored, since recurrences of NMS have been reported.

[As noted shove, we have requested additional information on treating patients with hyperglyczmin in the Approvable Letter. Section 5.5 will be modified when we have reviewed the requested information. We have also erouped hyperglycemin, hyperholdemin, and weight gain together (see Full Prescribing Contents section and order the appropriate sections below to correspond to those changes.)]

5.5 Hyperglycemis and Diabetes Mellitus

Hyperglycemia, in some cases extreme and associated with ketoacldosis or hyperosmolar coma or death, has been reported in patients treated with atypical antipsychotics, including clanzapine alone, as well as clanzapine taken concomitantly with fluoxedne. Assessment of the relationship between atypical antipsychotic use and glucose abnormalities is complicated by the possibility of an increased background risk of diabetes mellitus in patients with schizophrenia and the increasing incidence of diabetes mellitus in the general population. Given these confounders, the relationship between stypical antipsychotic use and hyperglycemia-related adverse events is not completely understood. However, epidemiological studies suggest an increased risk of treatment-emorgent hyperglycemia-related adverse events in patients treated with the atypical amipsychotics. Precise risk estimates for hyperglycemia-related adverse events in patients treated with atypical antipsychotics are not available.

Patients with an established diagnosis of diabetes mellitus who are started on anypical analysychotics should be monitored regularly for worsening of glucose control. Patients with risk factors for diabetes mellitus (e.g., obesity, family history of diabetes) who are starting treatment with atypical antipsychotics should undergo fasting blood glupose testing at the beginning of treatment and periodically during treatment. Any patient treated with atypical antipsychotics should be monitored for symptoms of hyperglycemia including polydipsia, polyurla, polyphagia, and weakness. Patients who develop symptoms of hyperglycemia during treatment with atypical antipsychotics should undergo fasting blood glucose testing. In some cases, hyperglycemia has resolved when the atypical antipsychotic was discontinued; however, some patients required continuation of anti-diabetic treatment despite discontinuation of the suspect drug.

5.6 Serotonin Syndrome

The development of a potentially life-threatening serotonin syndrome may occur with SYMBYAX, particularly with concomitant use of serotonergic drugs (including triptens) and with drugs which impair metabolism of serotonin (including MAOIs). Serotonin syndrome symptoms may include mental status changes (e.g., agitation, hallucinations, come), autonomic instability (e.g., tachycardia, labile blood pressure, byperthermia), neuromuscular aberrations (c.g., hypercflexia, incoordination) and/or gastrointestinal symptoms (e.g., nausos, vomiting, diarrhes).

The concomitant use of SYMBYAX with MADIs intended to treat depression is contraindicated (see Contraindications (4) and Drug Interactions (7 13)].

If concomitant treatment of SYMBYAX with a 5-hydroxytryptamine receptor agonist (triptan) is clinically warranted, careful observation of the patient is advised, particularly during treetment initiation and dose increases [see Drug Interactions (7.19)].

The concomitant use of SYMBYAX with serotonin precursors (such as tryptophan) is not recommended (see Drug Interoctions (7.20)].

5.7 Allergie Events and Rash

In SYMBYAX premarketing controlled clinical studies, the overall incidence of rash or allergic events in SYMBYAX-treated patients [4.6% (26/571)] was similar to that of placebo [5.2% (25/477)]. The majority of the cases of rash and/or urticaria were mild; however, three patients discontinued (one due to rash, which was moderate in reverity and two due to allergic

In fluoretine US clinical studies, 7% of 10,782 fluoretine-treated patients developed various types of rather and/or unitaria, Among the cases of rash and/or urticaria reported in premarketing clinical studies, almost a third were withdrawn from treatment because of the rash and/or systemic signs or symptoms associated with the rash. Clinical findings reported in association with rash include fever, leukocytosis, arthralgias, edoma, corpal funnel syndrome, respiratory distress, lymphadenopathy, proteinuris, and mild transaminase elevation. Most patients improved promptly with discontinuation of fluoxetine and/or adjunctive treatment with antihistamines or steroids, and all patients experiencing these events were reported to recover completely.

> SOA Response to Lilly Motion in Limine Regarding Recent Exhibit A, Page 12 of 36 Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 8 2007

In fluoretine premarketing clinical studies, 2 patients are known to have developed a serious cutaneous systemic illness. In neither patient was there an unequivocal diagnosis, but I was considered to have a leukocytoclastic vasculitis, and the other, a severe desquamating syndrome that was considered variously to be a vasculitis or erythema multiforme. Other patients have had systemic syndromes suggestive of serum sickness.

Since the introduction of fluoxetine, systemic events, possibly related to vasculitis, have developed in patients with rash.

Although these events are rare, they may be serious, involving the lung, kidney, or liver. Death has been reported to occur in association with these systemic events.

Anaphylactoid events, including bronchospasm, angioedema, and urticaria alone and in combination, have been reported.

Pulmonary events, including inflammatory processes of varying histopathology and/or fibrosis, have been reported rarely.

These events have occurred with dyspnea as the only preceding symptom.

Whether these systemic events and rash have a common underlying cause or are due to different etiologies or pathogenic processes is not known. Furthermore, a specific underlying immunologic basis for these events has not been identified. Upon the appearance of rash or of other possible allergic phenomena for which an alternative etiology cannot be identified, SYMBYAX should be discontinued.

5.8 Screening Patients for Bipolar Disorder and Monitor for Mania/Hypomania

A major depressive episode may be the initial presentation of bipolar disorder. It is generally believed (though not established in controlled trials) that treating such an episode with an amidepressant alone may increase the likelihood of precipitation of a mixed/manic episode in patients at risk for bipolar disorder. Whether any of the symptoms described for clinical worsening and suicide risk represent such a conversion is unknown. However, prior to initiating treatment with an antidepressant, patients with depressive symptoms should be adequately screened to determine if they are at risk for bipolar disorder; such screening should include a detailed psychiatric history, including a family history of suicide, bipolar disorder, and depression. It should be noted that SYMBYAX is approved for use in treating bipolar depression.

In the two controlled bipolar depression studies there was no statistically significant difference in the incidence of manic events (manic reaction or manic depressive reaction) between SYMBYAX- and placebo-treated patients. In one of the studies, the incidence of manic events was (7% [3/43]) in SYMBYAX-treated patients compared to (3% [5/184]) in placebo-treated patients. In the other study, the incidence of manic events was (2% [1/43]) in SYMBYAX-treated patients compared to (8% [15/193]) in placebo-treated patients. This limited controlled trial experience of SYMBYAX in the treatment of bipolar depression makes it difficult to interpret these findings until additional data is obtained. Because of this and the cyclical nature of bipolar disorder, patients should be monitored closely for the development of symptoms of mania/hypomania during treatment with SYMBYAX.

5.9 Tardive Dyskinesia

A syndrome of potentially irreversible, involuntary, dyskinetic movements may develop in patients treated with antipsychotic drugs. Although the prevalence of the syndrome appears to be highest among the elderly, especially elderly women, it is impossible to tely upon prevalence estimates to predict, at the inception of antipsychotic treatment, which patients are likely to develop the syndrome. Whether antipsychotic drug products differ in their potential to cause tardive dyskinesia is unknown.

The risk of developing tardive dyskinesia and the likelihood that it will become ineversible are believed to increase as the duration of treatment and the total cumulative dose of antipsychotic drugs administered to the patient increase. However, the syndrome can develop, although much less commonly, after relatively brief treatment periods at low doses or may even arise after discontinuation of treatment.

There is no known treatment for established cases of tardive dyskinesia, although the syndrome may remit, partially or completely, if antipsychotic treatment is withdrawn. Antipsychotic treatment little, however, may suppress (or partially suppress) the signs and symptoms of the syndrome and thereby may possibly mask the underlying process. The offeet that symptomatic suppression has upon the long-term course of the syndrome is unknown.

The incidence of dyskinetic movement in SYMBYAX-treated parlents was infrequent. The mean score on the Abnormal involuntary Movement Scale (AIMS) in the SYMBYAX-controlled database across clinical studies involving SYMBYAX-treated patients decreased from baseline. Nonetheless, SYMBYAX should be prescribed in a manner that is most likely to minimize the risk of tardive dyskinesia. If signs and symptoms of tardive dyskinesia appear in a patient on SYMBYAX, drug discontinuation should be considered. However, some patients may require treatment with SYMBYAX despite the presence of the syndrome. The need for continued treatment should be reassessed periodically.

5.10 Orthostatic Hypotension

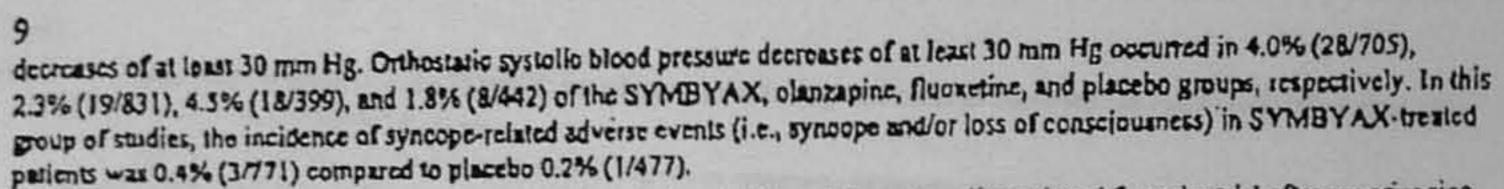
SYMBYAX may induce onthostatic hypotension associated with dizziness, tachycardia, bradycardia, and in some patients, syncope, especially during the initial dose-titration period.

In the SYMBYAX-controlled clinical trials across all indications, there were no significant differences between SYMBYAXtreated patients and clanzapine, fluoxetine or placebo-treated patients in exposure adjusted rates of orthostatic systelle blood pressure

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI MAR 2 8 2007

G. Brophy

Unsealed in Alaska v. Lilly 3AN 06-5630 CIV



In a clinical pharmacology study of SYMBYAX, three healthy subjects were discontinued from the trial after experiencing severe, but self-limited, hypotension and bradycardia that occurred 2 to 9 hours following a single 12-mg/50-mg dose of SYMBYAX. Reactions consisting of this combination of hypotension and bradycardia (and also accompanied by sinus pause) have been observed in at least three other healthy subjects treated with various formulations of olsnzapine (one oral, two intramuscular). In comboiled clinical studies, the incidence of patients with a ≥20 bpm decrease in orthostatic pulse concomitantly with a ≥20 mm Hg decrease in orthostatic systolic blood pressure was 0.3% (2/706) in the SYMBYAX group, 0.2% (1/445) in the placebo group, 0.7% (6/837) in the placebo group, and 0% (0/404) in the fluoxetine group.

SYMBYAX should be used with particular caution in patients with known cardiovascular disease (history of myocardial infarction or ischemia, heart failure, or conduction abnormalities), cerebrovascular disease, or conditions that would predispose patients to hypotension (dehydration, hypovolemia, and treatment with antihypertensive medications).

5.11 Dysphagia

Esophageal dysmotility and aspiration have been associated with antipsychotic drug use. Aspiration pneumonia is a common cause of morbidity and mortality in patients with advanced Alzheimer's disease. Olanzapine and other antipsychotic drugs should be used cautiously in patients at risk for aspiration pneumonia.

5.12 Selzures

Seizures occurred in 0.2% (4/2547) of SYMBYAX-treated patients during open-label clinical studies. No seizures occurred in the controlled SYMBYAX studies. Seizures have also been reported with both olangapine and fluoxetine monotherapy.

SYMBYAX should be used cautiously in patients with a history of seizures or with conditions that potentially lower the seizure threshold. Conditions that lower the seizure threshold may be more prevalent in a population of 265 years of age.

[As noted, we will want the Weight Section ravised with new requested information and moved to be adjacent to the hyperelycemia and hyperlipidemia sections.]

5.13 Weight Gain

In clinical studies, the mean weight increase for SYMBYAX-breated patients after 8 weeks of treatment was statistically significantly greater than placebo-treated (4.3 kg vs -0.5 kg) and fluoxetino-treated (4.3 kg vs -0.2 kg) patients, but was not statistically significantly different from clanzapine-treated patients (4.3 kg vs 4.1 kg). Thirty-five percent of SYMBYAX-treated patients met criterion for having gained >7% of their baseline weight. This was statistically significantly greater than placebo-treated (3%) and fluoxetine-treated patients (3%) but was not statistically significantly different than clanzapine-treated patients (31%).

5.14 Transaminase Elevations

As with clanzapine, asymptomatic elevations of hepatic transaminases [ALT (SGPT), AST (SGOT), and GGT] and alkaline phosphatase have been observed with SYMBYAX. In the SYMBYAX-controlled database, ALT (SGPT) elevations (normal baseline and ≥3 times the upper limit of the normal range post-baseline) were observed in 3.4% (20/586) of patients exposed to SYMBYAX compared with none of the 342 placebo patients and 3.5% (23/665) of clanzapine-treated patients. The difference between SYMBYAX and placebo was statistically significant. Of the SYMBYAX patients who started normal at baseline and had increases in ALT ≥5 times the upper limit of normal range, none experienced jaundice and four had transient elevations >200 IU/L. In the premarketing SYMBYAX controlled database, ALT (SGPT) elevations (23 times the upper limit of the normal range) was observed in 6.3% (31/495) of patients exposed to SYMBYAX compared with 0.5% (3/384) of the placebo patients and 1.5% (25/560) of elevations (526 Adverse Reactions (6.1)).

In olanzapine placebo-controlled studies, clinically significant ALT (SGPT) elevations (23 times the upper limit of the normal range) were observed in 2% (6/243) of patients exposed to olanzapine compared with 0% (0/115) of the placebo patients. None of these patients experienced jaundice. In 2 of these patients, liver enzymes decreased toward normal despite communed treatment, and in 2 others, enzymes decreased upon discontinuation of olanzapine. In the remaining 2 patients, 1, scropositive for hepatitis C, had perstatent enzyme elevations for 4 months after discontinuation, and the other had insufficient follow-up to determine if enzymes normalized.

Within the larger of states premarketing database of about 2400 patients with baseline SGPT \$90 IU/L, the incidence of SGPT elevation to >200 IU/L was 2% (50/2381). Again, none of these patients experienced jaundice or other symptoms attributable to liver impairment and most had transient changes that tended to normalize while of other symptoms attributable to 2500 patients in of other symptoms attributable to 2500 patients in of other symptoms attributable 1% (23/2500) discontinued treatment was continued. Among all

MAR 2 & 2007

G. Brophy

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI Rare postmarketing reports of hepatitis have been received. Very rare cases of cholestatic or mixed liver injury have also been reported in the postmarketing period.

Caution should be exercised in patients with signs and symptoms of haponic impairment. In patients—to personant a conditions associated with limited hapatic functional reserve, and in patients who are being treated with potentially hapatotaxic drugs. Periodic assessment of transaminases is recommended in patients with significant hapatic disease [see Warnings and Precautions (5.24)].

5.15 Abnormal Blending

Published case reports have documented the occurrence of bleeding episodes in patients treated with psychotropic drugs that interfere with serotonin reuptake. Subsequent epidemiological studies, both of the case-control and cohort design, have demonstrated an association between use of psychotropic drugs that interfere with serotonin reuptake and the occurrence of upper gastrointestinal bleeding. In two studies, concurrent use of a nonsteroidal anti-inflammatory drug (NSAID) or aspirin potentiated the risk of bleeding (see Drug Interactions (7.23, 7.24)]. Although these studies focused on upper gastrointestinal bleeding, there is reason to believe that bleeding at other sites may be similarly potentiated. Patients should be cautioned regarding the risk of bleeding associated with the concomitant use of SYMBYAX with NSAIDs, aspirin, or other drugs that affect coagulation.

S.16 Hyponetremia

Hyponetremia has been observed in SYMBYAX premarketing clinical atudies. In controlled trials, no SYMBYAX-treated patients had a treatment-emergent serum sodium below 129 mmoVL; however, a lowering of serum sodium below the reference range occurred at an incidence of 1.6% (11/693) of SYMBYAX-treated patients compared with 0.5% (2/380) of placebo patients. This difference was not statistically significant. In open label studies, 0.0% (1/2376) of these SYMBYAX-treated patients had a treatment-emergent serum sodium below 129 mmol/L.

Cases of hyponatremia (some with serum sodium lower than 110 mmoVL) have been reported with fluoxetine. The hyponatremia appeared to be reversible when fluoxetine was discontinued. Although these cases were complex with varying possible etiologies, some were possibly due to the syndrome of inappropriate antidiuretic hormone secretion (SIADH). The majority of these occurrences have been in older patients and in patients taking diuretics or who were otherwise volume depleted. In two 6-week controlled studies in patients 260 years of age, 10 of 323 fluoxetine patients and 6 of 327 placebo recipients had a lowering of serum sodium below the reference range; this difference was not statistically significant. The lowest observed concentration was 129 mmol/L. The observed decreases were not clinically significant.

5.17 Cognitive and Motor Impairment

Sedation-related adverse events were commonly reported with SYMBYAX treatment occurring at an incidence of 26.6% in SYMBYAX-treated patients compared with 10.9% in placebo-treated patients. Sedation-related adverse events (sedation, somnolence, hypersomnia, and lethargy) led to discontinuation in 2% (15/771) of patients in the controlled clinical studies. As with any CNS-active drug, SYMBYAX has the potential to impair judgment, thinking, or motor skills. Patients should be cautioned about operating hazardous machinery, including automobiles, until they are reasonably certain that SYMBYAX therapy does not affect them adversely.

5.18 Body Temperature Regulation

Disruption of the body's ability to reduce core body temperature has been attributed to antipsychotic drugs. Appropriate care is advised when prescribing SYMBYAX for patients who will be experiencing conditions which may contribute to an elevation in core body temperature (e.g., exercising strenuously, exposure to extreme heat, receiving concomitant medication with anticholinergic activity, or being subject to dehydration).

5.19 Use in Pattents with Concomitant Illners

Clinical experience with SYMBYAX in patients with concomitant systemic illnesses is limited [see Clinical Pharmocology (12.4)]. The following precautions for the individual components may be applicable to SYMBYAX.

Olanzapine exhibits in vitro musearinic receptor affinity. In premarketing clinical studies, SYMBYAX was associated with constipation, dry mouth, and tachycardia, all adverse events possibly related to chollnergic antegonism. Such adverse events were not often the basis for study discontinuations; SYMBYAX should be used with caution in patients with clinically significant prostatic hypertrophy, narrow angle glaucoma, a history of paralytic ileus, or related conditions.

In five placebo-controlled studies of olanzapine in elderly patients with dementia-related psychosis (n=1184), the following treatment-emergent adverse events were reported in olanzapine-treated patients at an incidence of at least 2% and significantly greater than placebo-treated patients: falls, somnolence, peripheral edems, abnormal gait, urinary incontinence, lethargy, increased weight, asthenia, pyrexia, pneumonia, dry mouth and visual hallucinations. The rate of discontinuation due to adverse events was significantly greater with olanzapine than placebo (13% vs 7%). Elderly patients with dementia-related psychosis treated with olanzapino are at an increased risk of death compared to placebo. Olanzapine is not approved for the treatment of patients with dementia-related psychosis.

Exhibit A, Page 15 of 36
SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments
Case No. 3AN-06-5630 CI

MAR 2 € 2007

@. Brophy

If the prescriber elects to treat elderly patients with dementis-related psychosis, vigilance should be exercised (see Box Warning and

As with other CNS-active drugs, SYMBYAX should be used with caution in elderly patients with dementia. Olanzapine is Wornings and Precautions (5.1)]. not approved for the treatment of patients with domentia-related psychosis. If the prescriber elects to treat elderly patients with demontia-related psychosis, vigilance should be exercised [see Box Warning and Warnings and Precautions (5.1)].

SYMBYAX has not been evaluated or used to any appreciable extent in patients with a recent history of myocardial infarction or unstable heart disease. Patients with these diagnoses were excluded from clinical studies during the premarket testing. Caution is advised when using SYMBYAX in cordine patients and in patients with diseases or conditions that could offeet

hemodynamic responses [see Warnings and Precautions (5.10)].

In subjects with cirrhosis of the liver, the clearances of fluoxetine and its active metabolite, norfluoxetine, were decreased, thus increasing the elimination half-lives of these substances. A lower dose of the fluoxeline-component of SYMBYAX should be used in patients with cirrhosis. Caution is advised when using SYMBYAX in patients with diseases or conditions that could affect its metabolism [see Clinical Pharmacology (12.4) and Dosage and Administration (2.3)].

Olanzapine and fluoxetine individual pharmacokinetics do not differ significantly in patients with renal impairment. SYMBYAX dosing adjustment based upon renal impairment is not routinely required [see Clinical Pharmacology (12.4)].

As with other drugs that antagonize dopamine D2 receptors, SYMBYAX elevates prolactin levels, and a modest elevation 5.20 persists during administration; however, possibly associated clinical manifestations (e.g., galactorrhea and breast enlargement) were

Tissue culture experiments indicate that approximately one-third of human breast cancers are protectin dependent in vitro, a infrequently observed. factor of potential importance if the prescription of these drugs is contemplated in a patient with previously detected breast cancer of this type. Although disturbances such as galautorrhea, amenorrhea, gynecomastia, and impotence have been reported with prolactin-elevating compounds, the clinical significance of elevated serum protectin levels is unknown for most patients. As is common with compounds that Increase protectin release, an increase in mammary gland neoplasia was observed in the olanzapine curcinogenicity studies conducted in mice and rats (see Nonclinical Toxicology (13.1)). However, neither clinical studies nor epidemiologia studies have shown an association between chronic administration of this class of drugs and tumorigenesis in humans; the available evidence is considered too limited to be conclusive.

Concomitant Use of Olanzapine and Fluoxetine Products 5.21

SYMBYAX contains the same active ingredients that are in Zyprexa and Zyprexa Zydis (olanzapine) and in Prozec, Prozec Weekly, and Surafem (fluoxetine HCl). Caution should be exercised when prescribing these medications concomitantly with SYMBYAX (see Overdosage (10)).

Long Half-Life of Fluoretine

Because of the long elimination half-lives of fluoxetine and its major active metabolite, changes in dose will not be fully reflected in plasma for several weeks, affecting both strategies for titration to final dose and withdrawal from treatment [sea Clinical Pharmacology (12.3)].

Discontinuation of Treatment with SYMBYAX 5,23

During marketing of fluoxetine, a component of SYMBYAX, and other SSRIs and SNRIs (serotonia and norepinephrine reuptake inhibitors), there have been spontaneous reports of adverse events occurring upon discontinuation of these drugs, particularly when abrupt, including the following: dysphorie mood, Initability, agitation, dizziness, sensory disturbances (e.g., paresthesias such as electric shock sensations), anxiety, confusion, headache, lethargy, emotional lability, insomnia, and hypomania. While these events are generally self-limiting, there have been reports of serious discontinuation symptoms. Patients should be monitored for these symptoms when discontinuing treatment with fluoxetine. A gradual reduction in the dose rather than abrupt cessation is recommended whenever possible. If intelerable symptoms occur following a decrease in the dose or upon discontinuation of treatment, then resuming the previously prescribed dose may be considered. Subsequently, the physician may continue decreasing the dose but at a more gradual rate. Plasma fluoxetine and norfluoxetine concentration docrease gradually at the conclusion of therapy, which may minimize the risk of discontinuation symptoms with this drug [see Dosage and Administration (2.4)].

Laboratory Tests 5.24

Periodic assessment of transaminases is recommended in patients with significant hepatic disease (sea Warnings and Precautions, 5.14)].

ADVERSE REACTIONS 6

6.1 Clinical Trials Experience

MAR 2 8 2007 G. Brophy

Exhibit A, Page 16 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

15:09 MAR-28-2007

12

The information below is derived from a clinical study database for SYMBYAX consisting of 2547 patients with treatment resistant depression, bipolar depression, major depressive disorder with psychosis, or sexual dysfunction with approximately 1085 patient-years of exposure. The conditions and duration of treatment with SYMBY AX varied greatly and included (in overlapping categories) open-label and double-blind phases of studies, inpatients and outpatients, fixed-dose and dose-titration studies, and short-term or long-term exposure.

Adverse events were recorded by ellnical investigators using descriptive terminology of their own choosing. Consequently, it is not possible to provide a meaningful estimate of the proportion of individuals experiencing adverse events without first grouping similar types of events into a limited (i.e., reduced) number of standardized event categories.

In the tables and tabulations that follow, MedDRA or COSTART Dictionary terminology has been used to classify reported adverse events. The data in the tables represent the proportion of individuals who experienced, at least once, a treatment-emergent adverse event of the type listed. An event was considered treatment-emergent if it occurred for the first time or worsened while receiving therapy following baseline evaluation. It is possible that events reported during therapy were not necessarily related to drug exposure.

The prescriber should be aware that the figures in the tables and tabulations cannot be used to predict the Incidence of side effects in the course of usual medical practice where patient characteristics and other factors differ from those that prevailed in the clinical studies. Similarly, the cited frequencies cannot be compared with figures obtained from other clinical investigations involving different treatments, uses, and investigators. The cited figures, however, do provide the prescribing clinician with some basis for estimating the relative contribution of drug and non-drug factors to the side effect incidence rate in the population studied.

Incidence in Controlled Clinical Studies

The following findings are based on the short-term, controlled studies including bipolar depression and treatment resistant depression.

Adverse events associated with discontinuation of pentment - Overall, 11.3% of the 771 patients in the SYMBYAX group discontinued due to adverse events compared with 4.4% of the 477 patients for placebo. Adverse events leading to discontinuation associated with the use of SYMBYAX (incidence of at least 1% for SYMBYAX and greater than that for placebo) using MedDRA Dictionary coding were weight increased (2%) and sedation (1%) versus placebo patients which had 0% incidence of weight increased and sedation.

Commonly observed adverse events in controlled clinical studies - The most commonly observed adverse events associated with the use of SYMBYAX (incidence 25% and at least twice that for placebo in the SYMBYAX-controlled database) using MedDRA Dictionary coding were: disturbance in attention, dry mouth, fatigue, hypersomnia, increased appetite, peripheral edema, sedstion, somnolence, tremot, vision blurred and weight increased. Adverse events reported in clinical trials of olanzapine/fluoxetine in combination are generally consistent with treatment-emergent adverse events during clanzapine or fluoxetine monotherapy.

Adverse events occurring at an incidence of 2% or more in short-term controlled clinical studies - Table 1 enumerates the treatment-emergent adverse events associated with the use of SYMBYAX (incidence of at least 2% for SYMBYAX and twice or more than for placebo). The SYMBYAX-controlled column includes patients with various diagnoses while the placebo column includes only patients with bipolar depression and major depression with psychotic features.

Table 1: Treatment-Emergent Adverse Events: Incidence in Controlled Clinical Studies

System Organ Class	Adverse Event	Percentage of Patients Reporting Event		
		SYMBYAX-Controlled (N=771)	Placebo (N=477)	
Eyo disorders	Vision blurred	5	2	
Gastrointestinal disorders	Dry mouth	15		
	Flamience	3	-	
	Abdominal distension	2	0	
General disorders and	Fatigue	12	7	
administration site conditions	Edema peripheral	9	0	
	Edema	3	0	
	Asthenla	3		
	Pain	2		

Exhibit A, Page 17 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 8 2007

3	Pyrexia	2	1
Infections and infestations	Sinusitia	7	1
Investigations	Weight increased	25	3
Metabolism and nutrition Increased appealte disorders		20	4
Musculoskeletal and	Arthralgia	4	1
connective tissue disorders	Pain in extremity	3	
	Museuloskeletal stiffness	2	
Nervous system disorders	Somnolence	14	6
	Tremor	9	3
	Sedation	8	4
	Hypersomnia	5	
	Disturbance in attention	5	1
	Lethargy	3	
Psychiatric disorders	Restlessness	4	
	Thinking abnormal	2	1
	Nervousness	2	1
Reproductive system and breast disorders	Erectile dysfunction	2	1

Additional Findings Observed in Clinical Studies

Effect on cardine repolarization — The mean increase in QT, interval for SYMBYAX-treated patients (4.4 msec) in clinical studies was significantly greater than that for placebo-treated (-0.8 msec), clanzapine-treated (-0.3 msec) patients, and fluoxetine-treated (1.7 msec) patients. There were no significant differences between patients treated with SYMBYAX, placebo, clanzapine, or fluoxetine in the incidence of QT, outliers (>500 msec).

As discussed above, we Intend to move and group together data relevant to treatment-emergent hyperglycemia, hyperlipidemia, and weight gain to Warnings/Precautions. In addition, the information in these sections will need to be revised to include new information based on requested new data searches and analyses.]

Laboratory changes — In SYMBYAX clinical studies, (including treatment resistant depression, bipolar depression, major depressive disorder with psychosis, or sexual dysfunction) SYMBYAX was associated with statistically significantly greater frequencies for the following treatment-emergent findings in laboratory analytes (normal at baseline to abnormal at any time during the trial) compared to placebo: clovated random blood glucose levels of ≥200 mg/dL in patients with levels of <140 mg/dL at baseline (2.9% vs. 0.3%); clevated random cholesterol ≥240 mg/dL in patients with levels of <200 mg/dL at baseline (9.7% vs. 1.9%); elevated prolactin (27.6% vs. 4.8%); elevated urea nitrogen (2.8% vs. 0.8%); elevated uric acid (2.9% vs. 0.5%); low albumin (2.7% vs. 0.3%); low bicarbonate (14.1% vs. 8.8%); low hemoglobin (2.6% vs. 0%); low inorganic phosphorus (1.9% vs. 0.3%); low lymphocytes (1.9% vs. 0%); and low total bilirubin (15.3% vs. 3.9%).

In olanzapine clinical studies among olanzapine-treated patients with random triglyceride levels of <150 mg/dL at baseline (N=659), 0.5% of patients experienced triglyceride levels of ≥500 mg/dL anytime during the trials. In these same trials, olanzapine-treated patients (N=1185) had a mean increase of 20 mg/dL in triglycerides from a mean baseline value of 175 mg/dL.

Sexual dysfunction — In the pool of controlled SYMBYAX studies in patients with bipolar depression, there were higher rates of the treatment—emergent adverse events decreased libido, anorgasmia, impotence and abnormal ejaculation in the SYMBYAX group. One case of decreased libido led to discontinuation in the SYMBYAX group. In the controlled studies that contained a fluoxetine arm, the rates of decreased libido and abnormal ejaculation in the SYMBYAX group. In the controlled the rates in the fluoxetine group. None of the differences were statistically significant.

Sexual dysfunction, including priapism, has been reported with all SSRIs. While it is difficult to know the precise risk of Vital signs — Technostic Andrews in Annual SSRIs, physicians should routinely inquire about such possible side effects.

Vital signs — Tachycardia, bradycardia, and orthostatic hypotension have occurred in SYMBYAX-treated patients
[see Warnings and Precoultons (3.10)]. The mean standing pulse rate of SYMBYAX-treated patients was reduced by 0.7 beats/min.

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI MAR 2 8 2007

Other Events Observed In Clinical Studies

Following is a list of meabhant-emergent adverse events reported by patients treated with SYMBY AX in clinical fields. This listing is not intended to include events (1) already listed in provious tables or elsewhere in labeling, (2) for which a drug cause was remote, (3) which were so general as to be uninformative, (4) which were not considered to have significant clinical implications, or (5) which occurred at a rate equal to or less than placebo.

Events are classified by body system using the following definitions: frequent adverse events are those occurring in at least 1/100 patients; infrequent adverse events are those occurring in 1/100 to 1/1000 patients; and rare events are those occurring in fewer than 1/1000 patients.

iProvide your justification for modifying the listings of events below from currently approved labeling.

Body as a Whole - Frequent: chills, neck rigidity, photosentitivity reaction.

Cardiovascular System - Frequent: vasodilatation; Infrequent: QT-Interval prolonged.

Digestive System - Frequent: diarrhes; Infrequent: gastritis, gastroenteritis, nauses and vomiting, peptic ulcer;
Rore: gastrointestinal hemorrhage, intestinal obstruction, liver fatty deposit, pancrestitis.

Hemic and Lymphatic System - Fraquent: ecohymosis; Infrequent: anemia; Rare: leukopenia, purpura.

Metabolic and Nutritional - Frequent generalized edema, weight loss; Infraquent: glycosuria, obesity; Rore: bilirubinemia, creatinine increased, gout

Musculoskeletal System - Rare: osteoporosis.

Nervous System — Frequent: amnesia; Infrequent: ataxia, buccoglossal syndrome, cogwheel rigidity, dysarthria, emotional lability, cuphoria, extrapyramidal syndrome, hypokinesia, movement disorder, myoclonus; Rare: dystonia, hyperkinesia, libido increased, withdrawal syndrome.

Respiratory System - Infrequent: opistaxis, yawn; Rare: laryngismus.

Skin and Appendages - Infrequent: alopecia, dry skin, provitis; Rare: exfoliative demnatitis.

Special Senses - Frequent: taste perversion; Infrequent: abnormality of accommodation, dry eyes.

Urogenital System — Frequent: breast pain, menorrhagia, urinary frequency, urinary incontinence;
Infrequent: amenorrhea, female lactation, hypomenorrhea, metorrhagia, urinary retention, urinary urgency, urination impaired;
Rare: breast engorgement.

Adjusted for gender.

Other Events Observed with Olanzapias or Fluorettee Monotherapy

The following adverse events were not observed in SYMBYAX-treated patients during premarketing clinical studies but have been reported with plantapine or fluoretine monotherapy: aplastic anemia, cholestatic jaundice, diabetic coma, dyskinesia, ecsinophilic pneumonia, crythema multiforme, jaundice, rhabdomyolysis, serotonin syndrome, vasculitis, venous thromboambolic events (including pulmonary embolism and deep venous thromboais), violent behaviors. Random triglyceride levels of 21000 mg/dL have been rarely reported.

7 DRUG INTERACTIONS

The risks of using SYMBYAX in combination with other drugs have not been extensively evaluated in systematic studies. The drug-drug interactions of the individual components are applicable to SYMBYAX. As with all drugs, the potential for interaction by a variety of mechanisms (e.g., pharmacodynamic, pharmacokinetic drug inhibition or enhancement, etc.) is a possibility. Caution is advised if the concomitant administration of SYMBYAX and other CNS-active drugs is required. In evaluating individual cases, consideration should be given to using lower initial doses of the concomitantly administered drugs, using conservative titration schedules, and monitoring of clinical status (see Clinical Pharmacology (12.3)).

7.1 Astibypertensive agents

Because of the potential for clanzapine to induce hypotension, SYMBYAX may enhance the effects of certain antihypertensive agents (see Warnings and Precautions (5.10)).

7.2 Anti-Perkinsoning

The clanzapine component of SYMBYAX may untagonize the effects of levodops and departine agonists.

7.3 Benzodinzepines

Multiple doses of olanzapine did not influence the pharmacokinetics of diazepam and its active metabolite N-desmethyldiazepam. However, the coadministration of diazepam with olanzapine potentiated the orthostatic hypotension observed with olanzapine.

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI MAR 2 G 2007

When concurrently administered with fluoretime, the half-life of diszepam may be prolonged in some patients (see Clinical Pharmacology (7.29, 12.3)). Coadministration of alprazolam and fluoretime has resulted in increased alprazolam plasma concentrations and in further psychomotor performance decrement due to increased alprazolam levels.

7.4 Biperiden

Multiple doses of olanzapine did not influence the pharmacokinetics of biperiden.

7.5 Carbamazepide

Carbamazepine therapy (200 mg BID) causes an approximate 50% increase in the clearance of clanzapine. This increase is likely due to the fact that carbamazepine is a potent inducer of CYPIA2 activity. Higher daily doses of carbamazepine may cause an even greater increase in clanzapine clearance.

Potients on stable doses of carbamazepine have developed elevated plasma anticonvulsant concentrations and clinical anticonvulsant toxicity following initiation of concomitant fluoxetine treatment.

7.6 Clozapine

Elevation of blood levels of clozapine has been observed in patients receiving concomitant fluoxetine.

7.7 CNS Acting Drugs

Given the primary CNS effects of clanzapine, caution should be used when clanzapine is taken in combination with other centrally acting drugs.

7.8 Electrocogyulsive therapy (ECT)

There are no clinical studies establishing the benefit of the combined use of ECT and fluoretine. There have been thre reports of prolonged seizures in patients on fluoretine receiving ECT treatment [see Warnings and Precautions (5.12)].

7.9 Ethanol

Ethanol (45 mg/70 kg single dose) did not have an effect on clanzapine pharmacokinetics. The coadministration of ethanol with SYMBYAX may potentiate sedation and orthostatic hypotension.

7.10 Phyoxamine

Fluvoxamine, a CYP1A2 inhibitor, decreases the clearance of clanzapine. This results in a mean increase in clanzapine Created following fluvoxamine administration of 54% in female nonsmokers and 77% in male smokers. The mean increase in clanzapine AUC is 52% and 108%, respectively. Lower doses of the clanzapine component of SYMBYAX should be considered in patients receiving concomitant treatment with fluvoxamine.

7.11 Haloperidol

Elevation of blood levels of haloperidol has been observed in patients receiving concomitant fluoxetine.

7,12 Lithium

Multiple doses of clanzapine did not influence the pharmacokinetles of Ithium.

There have been reports of both increased and decreased lithium levels when lithium was used concomitantly with fluoretine.

Cases of lithium toxicity and increased serotonergic effects have been reported. Lithium levels should be monitored in patients taking SYMBYAX concomitantly with lithium.

7.13 Monoamise oxidese inhibitors

SYMBY AX should not be used in combination with an MAOI, or within a minimum of 14 days of discontinuing therapy with an MAOI. There have been reports of serious, sometimes fatal reactions (including hyperthermia, rigidity, myoclonus, autonomic instability with possible rapid fluctuations of vital signs, and mental status changes that include extreme agitation progressing to delirium and come) in patients receiving fluoxetine in combination with an MAOI, and in patients who have recently discontinued fluoxetine and are then started on an MAOI. Some cases presented with features resembling neuroleptic malignant syndrome. Since fluoxetine and its major metabolite have very long elimination half-lives, at least 5 works (perhaps longer, especially if fluoxetine has been prescribed chronically and/or at higher doses [see Clinical Pharmacology (12.3)] should be allowed after suppling SYMBYAX before starting an MAOI. [See Contraindications (4)].

7.14 Phenytoin

Patients on stable doses of phenytoin have developed alevated plasma levels of phenytoin with clinical phenytoin toxicity following initiation of concomitant fluoxetine.

7.15 Pimozide

Concomitant use of fluoxetine and pimozide is contraindicated. Clinical studies of pimozide with other antidepressants demonstrate an increase in drug interaction or QT, prolongation. While a specific study with pimozide and fluoxetine has not been [See Contraindications (4)].

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 8 2007

G. Brophy

Unsealed in Alaska v. Lilly 3AN 06-5630 CIV

16

7.16 Serotopergie Drugs

Based on the mechanism of action of SYMBYAX and the potential for serotonin syndrome, caution is advised when SYMBYAX is coadministered with other drugs that may affect the serotonergic nourotransmitter systems, such as triptans, linezolid (an antibiotic which is a reversible non-selective MAOI), lithium, transdol, or St. John's Wort [see Warnings and Precautions (5.6)]. The concomitant use of SYMBYAX with other SSRIs, SNRIs or tryptophan is not recommended [see Drug Interactions (7.21)].

7.17 Theophylline

Multiple doses of clanzapine did not affect the pharmacokinetics of theophylline or its metabolites.

7.18 Thioridazine

Thioridazine should not be administered with SYMBYAX or administered within a minimum of 5 weeks after discontinuation of SYMBYAX.

In a study of 19 healthy male subjects, which included 6 slow and 13 rapid hydroxylators of debrisoquin, a single 25-mg or al dose of thioridazine produced a 2.4-fold higher C_{max} and a 4.5-fold higher AUC for thioridazine in the slow hydroxylators compared with the rapid hydroxylators. The rate of debrisoquin hydroxylation is felt to depend on the level of CYP2D6 isozyme activity. Thus, this study suggests that drugs that inhibit CYP2D6, such as certain SSRIs, including fluoxetine, will produce elevated plasma levels of thioridazine [see Contraindications (4)].

Thioridazine administration produces a dose-related prolongation of the QT, interval, which is associated with serious ventricular arrhythmias, such as torsades de pointes-type arrhythmias and sudden death. This risk is expected to increase with fluoretine-induced inhibition of thioridazine metabolism (see Contraindications (4)).

7.19 Tricyclic autidepressants (TCAs)

Single doses of olangapine did not affect the pharmscokinetics of imipramine or its active metabolite designamine.

In two fluoxetine studies, previously stable plasma levels of impramine and designamine have increased >2- to 10-fold when fluoxetine has been administered in combination. This influence may persist for three weeks or longer after fluoxetine is discontinued. Thus, the dose of TCA may need to be reduced and plasma TCA concentrations may need to be monitored temporarily when SYMBYAX is coadministered or has been recently discontinued [see Drug Interactions (7.25) and Clinical Pharmacology (12.3)].

7.20 Triptans

There have been rare postmarketing reports of serotonin syndrome with use of an SSRI and a triptan. If concomitant treatment of SYMBYAX with a triptan is clinically warranted, careful observation of the patient is advised, particularly during treatment initiation and dose increases [see Warnings and Precautions (5.6)].

7.21 Tryptophan

Five patients receiving fluoretine in combination with tryptophan experienced adverse reactions, including agitation, restlessness, and gastrointestinal distress. Concomitant use with tryptophan is not recommended.

7.22 Valproste

In vitro studies using human liver microsomes determined that clanzapine has little potential to inhibit the major metabolic pathway, glucuronidation, of valproate. Further, valproate has little effect on the metabolism of clanzapine in vitro. Thus, a clinically significant pharmacokinetic interaction between clanzapine and valproate is unlikely.

7.23 Warfaria

Warfarin (20-mg single dose) did not affect plantapine pharmacokinetics. Single doses of plantapine did not affect the pharmacokinetics of warfarin.

Altered anticongulant effects, including increased bleeding, have been reported when fluoxetine is condministered with warfarin [see Warnings and Precautions (5.15)], Patients receiving warfarin therapy should receive careful congulation monitoring when SYMBYAX is initiated or stopped.

7.24 Drugs that Interfere with bemostasts (NSAIDs, aspirto, warfarin, etc.)

Serotonin release by platelets plays an important role in homostasis. Epidemiological studies of the case-control and cohort design that have demonstrated an association between use of psychotropic drugs that interfere with serotonin reuptake and the occurrence of upper gastrointestinal blending have also shown that concurrent use of an NSAID or aspirin potentiated the risk of bleeding [see Warnings and Precautions (5.15)]. Thus, pationts should be cautioned about the use of such drugs concurrently with SYMBYAX.

7.25 Drugs metabolized by CYP2D6

In vitro studies utilizing human liver microsomes suggest that olanzapine has little potential to inhibit CYPID6. Thus, olanzapine is unlikely to cause clinically important drug interactions mediated by this enzyme.

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments

Case No. 3AN-06-5630 CI

MAR 2 5 2007

G. Brophy

Unsealed in Alaska v. Lilly 3AN 06-5630 CIV

Approximately 7% of the normal population has a genetic variation that leads to reduced levels of activity of CYP2D6. Such individuals have been referred to as poor metabolizors of drugs such as debrisoquin, dexuomethorphan, and TCAs. Many drugs, such as most antidepressants, including fluoretine and other solective uptake inhibitors of acrotonin, are metabolized by this isoenzyme; thus, both the phurmscokinetic properties and relative proportion of metabolites are altered in poor metabolizers. However, for fluoxetine and its metabolite, the sum of the plasma concentrations of the 4 enantiomers is comparable between poor and extensive metabolizers [see Clinical Pharmacology (12.3)].

Fluoxetine, like other agents that are metabolized by CYP2D6, inhibits the activity of this isoenzyme, and thus may make normal metabolizers resemble poor metabolizers. Therapy with medications that are predominantly metabolized by the CYP2D6 system and that have a relatively narrow therapeutic index should be initiated at the low end of the dose range if a patient is receiving fluoxetine concurrently or has taken it in the previous five weeks. If fluoxetine is added to the treatment regimen of a patient already receiving a drug metabolized by CYP2D6, the need for a decreased dose of the original medication should be considered. Drugs with a narrow therapeutic index represent the greatest concern (including but not limited to, flecainide, vinblastine, and TCAs). Due to the risk of serious ventricular arthythmias and sudden death potentially associated with elevated thioridazine plasma levels, thioridazine should not be administered with fluoxotine or within a minimum of five weeks after fluoxetine has been discontinued [see Contraindications, (4) and Drug Interactions (7.18)].

7,26 Drugs metabolized by CYPJA

In vivo studies utilizing human liver microsomes suggest that clanzapine has little potential to inhibit CYP3A. Thus, olanzapine is unlikely to cause clinically important drug interactions modiated by those enzymes.

In an in vivo interaction study involving the coadministration of fluoxesine with single doses of terfenodine (a CYP3A substrate), no increase in plasma terfenadine concentrations occurred with concomitant fluoxetine. In addition, in vitro studies have shown ketoconazole, a potent inhibitor of CYPJA activity, to be at least 100 times more potent than fluoxetine or norfluoxetine as an inhibitor of the metabolism of several substrates for this enzyme, including astemizole, cisapride, and midazolam. These data indicate that fluoxetine's extent of inhibition of CYP3A activity is not likely to be of clinical significance.

Effect of clanzapine on drugs metabolized by other CYP enzymes 7.27

In vitro studies utilizing human liver microsomes suggest that clanzapine has little potential to inhibit CYP1A2, CYP2C9, and CYPZC19. Thus, planzapine is unlikely to cause clinically important drug interactions mediated by these enzymes.

The effect of other drugs on olanzapine 7.28

Fluoretine, an inhibitor of CYP2D6, decreases olanzapine clearance a small amount (see Clinical Pharmacology (12.3)].. Agents that induce CYPIA2 or glucuronyl transferase enzymes, such as omeprazole and rifampin, may cause an increase in olanzapine charance. Fluvoxamine, an inhibitor of CYPIA2, decreases olanzapine clearance (see Drug Interactions (7.10)). The effect of CYPIA2 inhibitors, such as fluvoxamine and some fluoroquinolone antibiotics, on SYMBYAX has not been evaluated. Although olanzapine is metabolized by multiple enzyme systems, induction or inhibition of a single enzyme may appreciably alter olanzapine clearance. Therefore, a dosage increase (for induction) or a dosage decrease (for inhibition) may need to be considered with specific drugs.

Drugs tightly bound to plasma proteins 7.29

The in vitro binding of SYMBYAX to human plasma proteins is similar to the individual components. The imeraction between SYMBYAX and other highly protein-bound drugs has not been fully evaluated. Because fluoxetine is tightly bound to plasma protein, the administration of fluoxetine to a patient taking another drug that is tightly bound to protein (e.g., Coumadin, digitoxin) may cause a shift in plasma concentrations potentially resulting in an adverse effect. Conversely, adverse offects may result from displacement of protein-bound fluoxesine by other tightly bound drugs [see Clinical Pharmacology (12.3)].

USE IN SPECIFIC POPULATIONS 8

8.1 Pregnancy

Teralogenic effects - Pregnancy Category C

We have removed inaccurate and redundant information in the following sectional

SYMBYAX --- SYMBYAX has been shown to be totalogenia (or to have an embryopidal offeet or other edverse effect) in rete when given in dozes of cleazapine and fluencline in combination at 3 and 1 times the human docu, respectively. There are no edequate and well acoustolled studies in pregnant warron. SYMBYAX should be used during prognancy only if the patential bonafin Justifies the petential risk to the fotus. Embryo fetal development studies were conducted in rats and rabbits with olanzapine and fluoxetine in low-dose and high-dose combinations. In rate, the doses were: 2 and 4 mg/kg/day (low-dose) [1 and 0.5 times the MRHD on a mg/m2 basis, respectively], and 4 and 8 mg/kg/day (high-doso) [2 and 1 times the MRHD on a mg/m2 basis, respectively]. In rabbits, the doses were 4 and 4 mg/kg/day (low-dose) [4 and 1 times the MRHD on a mg/m2 basis, respectively], and 8 and 8 mg/kg/day (high-dose) [9 and 2 times the MRHD on a mg/m2 basis, respectively). In these studies, planzapine and fluoxetine were

> Exhibit A, Page 22 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 6 2007

also administered alone at the high-doses (4 and 8 mg/kg/day, respectively, in the rat; 8 and 8 mg/kg/day, respectively, in the rabbit, there was no evidence of teratogenicity; however, the high-dose combination produced decreases in fetal weight and retarded sketcal assification in conjunction with maternal toxicity. Similarly, in the rat there was no evidence of teratogenicity; however, a decrease in fetal weight was observed with the high-dose combination.

In a pre- and postnatal study conducted in rats, clanzapine and fluoretine were administered during pregnancy and throughout lactation in combination (low-dose: 2 and 4 mg/kg/day [1 and 0.5 times the MRHD on a mg/m² basis], respectively, high-dose: 4 and 8 mg/kg/day [2 and 1 times the MRHD on a mg/m² basis], respectively, and alone: 4 and 8 mg/kg/day [2 and 1 times the MRHD on a mg/m² basis], respectively). Administration of the high-dose combination resulted in a marked elevation in offspring monality and growth retardation in comparison to the same doses of clanzapine and fluoretine administered alone. These effects were not observed with the low-dose combination; however, there were a few cases of testicular degeneration and atrophy, depletion of epididymal sperm and infertility in the male progeny. The effects of the high-dose combination on postnatal endpoints could not be assessed due to high progeny mortality.

There are no adequate and well-controlled studies with SYMBYAX in pregnant women.

SYMBYAX should be used during programcy only if the potential benefit justifies the potential risk to the fetus.

Olanzapine — In reproduction studies in rats at doses up to 18 mg/kg/day and in rabbits at doses up to 30 mg/kg/day (9 and 30 times the MRHD on a mg/m² basis, respectively), no evidence of teratogenicity was observed. In a rat teratology study, early resorptions and increased numbers of nonviable fetuses were observed at a dose of 18 mg/kg/day (9 times the MRHD on a mg/m² basis). Gestation was prolonged at 10 mg/kg/day (5 times the MRHD on a mg/m² basis). In a rabbit teratology study, fetal toxicity (manifes and as increased resorptions and decreased fetal weight) occurred at a maternally toxic dose of 30 mg/kg/day (30 times the MRHD on a mg/m² basis).

Placental transfer of clanzapine occurs in rat pups.

There are no adequate and well-controlled clinical studies with plantapine in pregnant women. Seven pregnancies were observed during premarketing clinical studies with plantapine, including two resulting in normal births, one resulting in neonatal death due to a cardiovascular defect, three therapeutic abortions, and one spontaneous abortion.

Fluoretine — In embryo fetal development studies in rats and rabbits, there was no evidence of teratogenicity following administration of up to 12.5 and 15 mg/kg/day, respectively (1.5 and 3.6 times the MRHD on a mg/m² basis, respectively) throughout organogenesis. However, in rat reproduction studies, an increase in stillborn pups, a decrease in pup weight, and an increase in pup deaths during the first 7 days postpartum occurred following maternal exposure to 12 mg/kg/day (1.5 times the MRHD on a mg/m² basis) during gestation or 7.5 mg/kg/day (0.9 times the MRHD on a mg/m² basis) during gestation and lactation. There was no evidence of developmental neurotoxicity in the surviving offspring of rata treated with 12 mg/kg/day during gestation. The no-effect dose for rat pup mortality was 5 mg/kg/day (0.6 times the MRHD on a mg/m² basis).

Treatment of Pregnant Women During the Third Trimester — Neonates exposed to (Iuoxetine, a component of SYNBYAX, and other SSRIs or SNRIs, late in the third trimester have developed complications requiring prolonged hospitalization, respiratory support, and tube feeding. Such complications can arise immediately upon delivery. Reported clinical findings have included respiratory distrest, cyanosis, apnea, seizures, temperature instability, feeding difficulty, vamiting, hypoglycemia, hypotonia, hypertonia, hyperteffexia, tremor, jitteriness, irritability, and constant crying. These features are consistent with either a direct toxic effect of SSRIs and SNRIs or, possibly, a drug discontinuation syndrome. It should be noted that, in some cases, the clinical picture is consistent with serotonia syndrome (see Contraindications (4) and Drug Interactions (7.16)]. When treating pregnant women with fluoxetine during the third trimester, the physician should carefully consider the potential risks and benefits of treatment. The physician may consider tapering fluoxetine in the third trimester.

8.2 Labor and Delivery

SYMBYAX — The effect of SYMBYAX on labor and delivery in humans is unknown. Parturition in rate was not affected by SYMBYAX. SYMBYAX should be used during labor and delivery only if the potential benefit justifies the potential risk.

Olanzapine - The effect of clanzapine on labor and delivery in humans is unknown. Parturition in rats was not affected by clanzapine.

Fluoretime — The effect of fluoretime on labor and delivery in humans is unknown. Fluoretime crosses the placenta; therefore, there is a possibility that fluoretime may have adverse effects on the newborn.

83 Nursing Mothers

SYMBYAX — There are no adequate and well-controlled studies with SYMBYAX in nursing mothers or infants. Studies evaluating the individual components of SYMBYAX (clanzapine and fluoxetine) in nursing mothers are described below. It is not known whether SYMBYAX is excreted in human milk and because of the potential for serious adverse reactions in nursing infants

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI MAR & C 2007

G. Brophy

Unsealed in Alaska v. Lilly 3AN 06-5630 CIV

TOTAL P. 23

19 from SYMBYAX, a decision should be made whather to discontinue nursing or to discontinue the drug, taking into account the importance of the drug to the mother. It is recommended that women not breast-feed when recoiving SYMBYAX.

Olanzapine — In a study in lactating, healthy women, olanzapine was exercted in breast milk. Mean infant dose at steady state was estimated to be 1.8% of the maternal olanzapine dose. It is recommended that women receiving olanzapine should not breast-feed.

Fluoretime — Fluoretime is excreted in human breast milk. In one breast milk sample, the concentration of fluoretime plus norfluoretime was 70.4 ag/mL. The concentration in the mother's plasma was 295.0 ag/mL. No adverse effects on the infant were reported. In another case, an infant nursed by a mother on fluoretime developed crying, sleep disturbance, vomiting, and watery stools. The infant's plasma drug levels were 340 ag/mL of fluoretime and 208 ag/mL of norfluoretime on the 2nd day of feeding.

8.4 Pediatric Use

SYMBYAX — Safety and effectiveness in the pediatric population have not been established [see Box Warning and Warnings and Precoutions (5.3)]. Anyone considering the use of SYMBYAX in a child or adolescent must balance the potential risks with the clinical need.

Fluoretine — Significant toxicity, including myotoxicity, long-term neurobehavioral and reproductive toxicity, and impaired bone development, has been observed following exposure of juvenile animals to fluoretine. Some of these effects occurred at clinically relevant exposures.

In a study in which fluoretine (3, 10, or 30 mg/kg) was orally administered to young rats from wearing (Postnatal Day 21) through adulthood (Day 90), male and female sexual development was delayed at all doses, and growth (body weight gain, femur length) was decreased during the dosing period in animals receiving the highest dose. At the end of the treatment period, serum levels of creatine kinase (marker of muscle damage) were increased at the intermediate and high doses, and abnormal muscle and reproductive organ histopathology (skeleral muscle degeneration and necrosis, testicular degeneration and necrosis, epiddymal vacuolation and hypospermia) was observed at the high dose. When animals were evaluated after a recovery period (up to 11 weeks after cessation of dosing), neurobehavioral abnormalities (decreased reactivity at all doses and learning deficit at the high dose) and reproductive functional impairment (decreased maling at all doses and impaired fertility at the high dose) were seen; in addition, testicular and epididymal microscopic lesions and decreased sperm concentrations were found in the high dose group, indicating that the reproductive organ effects seen at the end of treatment were irreversible. The reversibility of fluoretine-induced muscle damage was not assessed. Adverse effects similar to those observed in rats treated with fluoretine during the juvenile period have not been reported after administration of fluoretine to adult animals. Plasma exposures (AUC) to fluoretine in juvenile rats receiving the low, intermediate, and high dose in this study were approximately 0.1-0.2, 1-2, and 5-10 times, respectively, the average exposure in pediatric patients receiving the maximum recommended dose (MRD) of 20 mg/doy. Rat exposures to the major metabolite, norfluoretine, were approximately 0.3-0.8, 1-8, and 3-20 times, respectively, pediatric exposure at the MRD.

A specific effect of fluoxetine on bone development has been reported in mice treated with fluoxetine during the juvenile period. When mice were treated with fluoxetine (5 or 20 mg/kg, intraperitoneal) for 4 weeks starting at 4 weeks of age, bone formation was reduced resulting in decreased bone mineral content and density. These doses did not affect overall growth (body weight gain or ferroral length). The doses administered to juvenile mice in this study are approximately 0.5 and 2 times the MRD for pediatric patients on a body surface area (mg/m³) basis.

In another mouse study, administration of fluoresine (10 mg/kg intraperitoneal) during early postnatal development (Postnatal Days 4 to 21) produced abnormal emotional behaviors (decreased exploratory behavior in elevated plus-maze, increased shock avoidance lutency) in adulthood (12 weeks of age). The dose used in this study is approximately equal to the pediatric MRD on a mg/m² basis. Because of the early dosing period in this study, the significance of these findings to the approved pediatric use in humans is uncertain.

8.5 Geriatric Use

SYMBYAX — Clinical studies of SYMBYAX did not include sufficient numbers of patients 265 years of age to determine whether they respond differently from younger patients. Other reported clinical experience has not identified differences in responses between the elderly and younger patients. In general, dose selection for an elderly patient should be cautious, usually starting at the low end of the dosing range, reflecting the greater frequency of decreased hepatic, renal, or cardiac function, and of concomitant disease or other drug therapy [see Dasage and Administration (2.1)].

Olanzapine — Of the 2500 patients in premarketing clinical studies with olanzapine, 11% (263 patients) were ≥65 years of age. In patients with schizophrenia, there was no indication of any different tolerability of olanzapine in the elderly compared with younger patients. Studies in patients with dementla-related psychosis have suggested that there may be a different tolerability profile in this population compared with younger patients with schizophrenia. In placebo-controlled studies of olanzapine in elderly patients with dementia-related psychosis, there was a significantly higher incidence of cerebrovascular adverse events (e.g., stroke, transient ischemic attack) in patients treated with olanzapine compared to patients treated with placebo. Olanzapine is not approved for the

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 8 2007

reasment of patients with demontia-related psychosis. If the prescriber cleats to treat elderly patients with demontia-related psychosis, vigitance should be exercised (see Box Warning, Warnings and Precautions (5.19) and Dosage and Administration (2.3)).

As with other CNS-active drugs, otanzapine should be used with caution in elderly patients with dementia. Also, the presence of factors that might decrease pharmacokinetic clearance or increase the pharmacodynamic response to olanzapine should lead to consideration of a lower starting dose for any geniable patient.

Fluoretine — US fluoretine clinical studies (10.782 patients) included 687 patients 265 years of age and 93 patients
275 years of age. No overall differences in safety or effectiveness were observed between these subjects and younger subjects, and
other reported clinical experience has not identified differences in responses between the elderly and younger patients, but greater
sensitivity of some older individuals cannot be ruled out. As with other SSRIs, fluoretine has been associated with cases of clinically
significant hyponatremia in elderly patients.

9 DRUG ABUSE AND DEPENDENCE

9.3 Dependence

SYMBYAX, as with fluoxetine and clanzapine, has not been systematically studied in humans for its potential for abuse, tolerance, or physical dependence. While the clinical studies did not reveal any tendency for any drug-seeking behavior, these observations were not systematic, and it is not possible to predict on the basis of this limited experience the extent to which a CNS-active drug will be misused, diverted, and/or abused once marketed. Consequently, physicians should carefully evaluate patients for history of drug abuse and follow such patients closely, observing them for signs of misuse or abuse of SYMBYAX (e.g., development of tolerance, incrementation of dose, drug-seeking behavior).

In studies in rats and rhesus monkeys designed to assess abuse and dependence potential, planzapine alone was shown to have acute depressive CNS effects but little or no potential of abuse or physical dependence at oral doses up to 15 (rat) and 8 (monkey) times the MRHD (20 mg) on a mg/m² basis.

10 OVERDOSAGE

SYMBVAX — During premarketing clinical studies of the olenzapine/fluoxetine combination, overdose of both fluoxetine and olanzapine were reported in five study subjects. Four of the five subjects experienced loss of consciousness (3) or coms (1). No fatalities occurred.

Adverse events involving overdose of fluoxetine and olanzapine in combination, and SYMBYAX, have been reported spontaneously to Eli Lilly and Company. An overdose of combination therapy is defined as confirmed or suspected ingestion of a dose of >20 mg clanzapine in combination with a dose of >80 mg fluoxetine. Adverse events associated with these reports included somnolence (sectation), impaired consciousness (coma), impaired neurologic function (araxia, confusion, convulsions, dysarthria), arrhythmias, lethargy, essential tremor, agitation, acute psychosis, hypotension, hypertension, and aggression. Fatalities have been confounded by exposure to additional substances including alcohol, thioridazine, oxycodone, and propoxyphene.

Ohanzapine — In postmarketing reports of overdose with olanzapine alone, symptoms have been reported in the majority of cases. In symptomatic patients, symptoms with >10% incidence included agitation/aggressiveness, dysarthria, tachycardia, various extrapyramidal symptoms, and reduced level of consciousness ranging from sedation to coma. Among less commonly reported symptoms were the following potentially medically serious events: aspiration, cardiopulmonary arrest, cardiac arrhythmias (such as supraventricular tachycardia as well as a patient that experienced sinus pause with spontaneous resumption of normal rhythm), delirium, possible neuroleptic malignant syndrome, respiratory depression/arrest, convulsion, hypertension, and hypotension. Eli Lilly and Company has received reports of fatality in association with overdose of olanzapine alone. In 1 case of death, the amount of scutcly ingested olanzapine was reported to be possibly as low as 450 mg; however, in another case, a patient was reported to survive an acuto olanzapine ingestion of 1500 mg.

Fluoretine - Worldwide exposure to fluoretine is estimated to be over 38 million patients (circs 1999). Of the 1578 cases of overdose involving fluoretine, alone or with other drugs, reported from this population, there were 195 deaths.

Among 633 adult patients who overdosed on fluoretine alone, 34 resulted in a fatal outcome, 378 completely recovered, and 15 patients experienced sequelae after overdose, including abnormal accommodation, abnormal gait, confusion, unresponsiveness, nervousness, putmonary dysfunction, vertigo, tremor, elevated blood pressure, impotence, movement disorder, and hypomania. The remaining 206 patients had an unknown outcome. The most common signs and symptoms associated with non-fatal overdose were seizures, somnolence, nausea, tachycardia, and vomiting. The largest known ingestion of fluoretine in adult patients was 8 grams in a patient who took fluoretine alone and who subsequently recovered. However, in an adult patient who took fluoretine alone, an ingestion as low as 520 mg has been associated with tenal outcome, but causality has not been established.

Among pediatric patients (ages 3 months to 17 years), there were 156 cases of overdose involving fluoretine alone or in combination with other drugs. Six patients died. 127 patients completely recovered, I patient experienced renal failure, and 22 patients

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 8 2007

21
had an unknown outcome. One of the 6 fatalities was a 9-year-old boy who had a history of OCD, Tourette's Syndrome With IIIS,
attention deficit disorder, and fetal alcohol syndrome. He had been receiving 100 mg of fluoxetine daily for 6 months in addition to
clonidine, methylphenidate, and promethazine. Mixed-drug ingestion or other methods of suicide complicated all 6 overdoses in
children that resulted in fatalities. The largest ingestion in pediatric patients was 3 grams, which was non-tethal.

Other important adverse events reported with fluoretine overdose (single or multiple drugs) included coma, delirium, ECG abnormalities (such as QT-interval prolongation and ventricular tachycardia, including torsades do pointes-type arrhythmias). hypotension, mania, neuroleptic malignant syndrome-like events, pyrexia, stupor, and syncope.

10.1 Management of Overdose

In managing overdose, the possibility of multiple drug involvement should be considered. In case of acute overdose, establish and maintain an airway and ensure adequate ventilation, which may include intubation. Induction of emests is not recommended as the possibility of obtundation, seizures, or dystonic reactions of the head and neck following overdose may create a risk for aspiration. Gastric lavage (after intubation, if patient is unconscious) and administration of activated charcost together with a laxative should be considered. Cardiovascular monitoring should commence immediately and should include continuous electrocardiographic monitoring to detect possible arrhythmias.

A specific procaution involves patients who are taking or have recently taken SYMBYAX and may have ingested excessive quantities of a TCA (tricyclic antidepressant). In such cases, accumulation of the parent TCA and/or an active metabolite may increase the possibility of serious sequelae and extend the time needed for close medical observation.

Due to the large volume of distribution of olanzapine and fluoxetine, forced diuresis, dialysis, hemoperfusion, and exchange transfusion are unlikely to be of benefit. No specific antidote for either fluoxetine or olanzapine overdose is known. Hypotension and circulatory collapse should be treated with appropriate measures such as intravenous fluids and/or sympathomimetic agents. Do not use epinephrine, dopamine, or other sympathomimetics with β-agonist activity, since beta stimulation may worsen hypotension in the setting of olanzapine-induced alpha blockade.

The physician should consider contacting a poison control center for additional information on the treatment of any overdose. Telephone numbers for centified poison control centers are listed in the Physicians' Desk Reference (PDR).

11 DESCRIPTION

SYMBYAX® (olanzapine and fluoxetine HCl capsules) combines 2 psychotropic agents, clanzapine (the active ingredient in Zyprexa®, and Zyprexa Zydis®) and fluoxetine hydrochloride (the active ingredient in Prozac®, Prozac Weekly™, and Sarafem®).

Olanzapine belongs to the thienobenzodiszepine class. The chemical designation is 2-methyl-4-(4-methyl-1-piperazinyl)10H-thieno[2,3-6] [1,5]benzodiszepine. The molecular formula is C₁₇H₂₀N_eS, which corresponds to a molecular weight of 3 12.44.

Fluoretine hydrochloride is a selective scrotonin reuptake inhibitor (SSRI). The chemical designation is (±)-N-methyl-3-phonyl-3-[(a,a,a-trifluoro-p-tolyl)axy]propylamine hydrochloride. The molecular formula is C₁₇H₁₈F₃NO-HCl, which corresponds to a molecular weight of 345.79.

The chemical structures are:

Olanzagine

fluoretine hydrochloride

Olanzapine is a yellow crystalline solid, which is practically insoluble in water.
Pluoxetine hydrochloride is a white to off-white crystallina solid with a solubility of 14 mg/mL in water.

MAR 2 6 2007

G. Brophy

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI Each capsule also contains progolatinized starch, gelatin, dimethicone, Ulanium dioxide, sodium lawyl sulfate, edible black ink, red Iron oxide, yellow Iron oxide, and/or black iron oxide.

12 CLINICAL PHARMACOLOGY

12.1 Mechanism of Action

Although the exact mechanism of SYMBYAX is unknown, it has been proposed that the activation of 3 monoaminergic neural systems (scrotonin, norepinephrine, and departine) is responsible for its enhanced antidepressant offect. This is supported by animal studies in which the clanzapine/fluoxetine combination has been shown to produce synergistic increases in norepinephrine and departine release in the prefrontal cortex compared with either component alone, as well as increases in secretonin.

12.2 Pharmacodynamics

Olanzapine is a psychotropic agent with high affinity binding to the following receptors: serotonin 5HT acc (K;=4 and 11 nM, respectively), dopamine D; 4 (K;=11 to 31 nM), muscarinic M; 5 (K;=1.9 to 25 nM), histamine H; (K;=7 nM), and adrenergic o; receptors (K,=19 nM). Olanzapine binds weakly to GABA, BZD, and \(\beta\)-adrenergic receptors (K,>10 \(\mu\)M). Fluoxetine is an inhibitor of the serotonin transporter and is a weak inhibitor of the norepinephrine and dopamine transporters.

Antagonism at receptors other than dopamine and SHT₁ with similar receptor affinities may explain some of the other therapeutic and side effects of clanzapine. Olanzapine's antagonism of muscarinic M_{1.5} receptors may explain its anticholinergic effects. The antagonism of histamine H₁ receptors by clanzapine may explain the somnolence observed with this drug. The antagonism of \(\alpha_1\)-adrenergic receptors by clanzapine may explain the orthogratic hypotension observed with this drug. Fluoxeline has relatively low affinity for muscarinic, \(\alpha_1\)-adrenergic, and histamine H₁ receptors.

12.3 Pharmacokinetics

SYMBYAX — Fluoxetine (administered as a 60-mg single dose or 60 mg daily for 8 days) caused a small increase in the mean maximum concentration of olanzapine (16%) following a 5-mg dose, an increase in the mean area under the curve (17%) and a small decrease in mean apparent clearance of olanzapine (16%). In another study, a similar decrease in apparent clearance of olanzapine of 14% was observed following olanzapine doses of 6 or 12 mg with concomitant fluoxetine doses of 25 mg or more. The decrease in clearance reflects an increase in bioavailability. The terminal half-life is not affected, and therefore the time to reach steady state should not be altered. The overall steady-state plasma concentrations of olanzapine and fluoxetine when given as the combination in the therapeutic dose ranges were comparable with those typically attained with each of the monotherapies. The small change in olanzapine clearance, observed in both studies, likely reflects the inhibition of a minor metabolic pathway for olanzapine via CYP2D6 by fluoxetine, a potent CYP2D6 inhibitor, and was not deemed clinically significant. Therefore, the pharmacokinetics of the individual components is expected to reasonably characterize the overall pharmacokinetics of the combination.

Absorption and Bloavailability

SYMBYAX — Following a single oral 12-mg/50-mg dose of SYMBYAX, peak plasms concentrations of clarappine and fluoretine occur at approximately 4 and 6 hours, respectively. The effect of food on the absorption and bioavailability of SYMBYAX has not been evaluated. The bioavailability of clarappine given as Zypreza, and the bioavailability of fluoretine given as Prozes were not affected by food. It is unlikely that there would be a significant food effect on the bioavailability of SYMBYAX.

Olanzapine — Olanzapine is well absorbed and reaches peak concentration approximately 6 hours following an oral dose. Food does not affect the rate or extent of clanzapine absorption when clanzapine is given as Zyprexa. It is climinated extensively by first pass metabolism, with approximately 40% of the dose metabolized before reaching the systemic circulation.

Fluoretine — Following a single oral 40-mg dose, peak plasma concentrations of fluoretine from 15 to 55 ng/mL are observed after 6 to 8 hours. Food does not appear to affect the systemic bioavailability of fluoretine given as Prozac, although it may delay its absorption by 1 to 2 hours, which is probably not elinically significant.

Distribution

SYMBYAX — The in vitro binding to human plasma proteins of the clanzapine/fluoxecine combination is similar to the binding of the individual components.

Olanzapine — Olanzapine is extensively distributed throughout the body, with a volume of distribution of approximately glycoprotein.

Fluoretine — Over the concentration range from 200 to 1000 ng/mL, approximately 94.5% of fluoretine is bound in vitro to human serum proteins, including albumin and cu-glycoprotein. The interaction between fluoretine and other highly protein-bound drugs has not been fully evaluated [see Drug Interactions (7.29)].

MAR 2 8 2007

G. Brophy

Exhibit A, Page 27 of 36
SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments
Case No. 3AN-06-5630 CI

Metabolism and Elimination

SYMBYAX - SYMBYAX therapy yielded steady-state concentrations of norfluoxetine similar to those seen with.

Thuoxetine in the therapeutic dose range.

Obsempline — Obsempline displays linear pharmacokinetics over the clinical dosing range. Its half-life ranges from 21 to 54 hours (5th to 95th percentile; mean of 30 hr), and apparent plasma clearance ranges from 12 to 47 L/hr (5th to 95th percentile; mean of 25 L/hr). Administration of clanzapine once daily leads to steady-state concentrations in about 1 week that are approximately twice the concentrations after single doses. Plasma concentrations, half-life, and clearance of clanzapine may vary between individuals on the basis of smoking status, gender, and age [see Dosage and Administration (2.3) and Clinical Pharmacology (12.4)].

Following a single oral dose of "C-tabeled clanzapine, 7% of the dose of clarzapine was recovered in the urine as unchanged drug, indicating that clanzapine is highly metabolized. Approximately 57% and 30% of the dose was recovered in the urine and foces, respectively. In the plasma, clanzapine accounted for only 12% of the AUC for total radioactivity, indicating significant exposure to metabolites. After multiple dosing, the major circulating metabolites were the 10-N-glucuronide, present at steady state at 44% of the concentration of clanzapine, and 4'-N-desmethyl clanzapine, present at steady state at 31% of the concentration of clanzapine. Both metabolites lack pharmacological activity at the concentrations observed.

Direct glucuronidation and CYP450-mediated oxidation are the primary metabolic pathways for olanzapine. In vitro studies suggest that CYP1A2, CYP2D6, and the flavin-containing monoexygenase system are involved in olanzapine exidation.

CYP2D6-mediated exidation appears to be a minor metabolic pathway in vivo, because the clearance of olanzapine is not reduced in subjects who are deficient in this ensyme.

Fluoxetine — Fluoxetine is a racemio mixture (50/50) of R-fluoxetine and S-fluoxetine energiomers. In animal models, both enantiomers are specific and potent serotonin uptake inhibitors with essentially equivalent pharmacologic activity. The S-fluoxetine enantiomer is eliminated more slowly and is the predominant enantiomer present in plasma at steady state.

Fluoxetine is extensively metabolized in the liver to its only identified active metabolite, norfluoxetine, via the CYP2D6 pathway. A number of unidentified metabolites exist.

In animal models, S-norfluoretine is a potent and selective inhibitor of serotonin uptake and has activity essentially equivalent to R- or S-fluoretine. R-norfluoretine is significantly less potent than the parent drug in the inhibition of serotonin uptake. The primary route of elimination appears to be hepatic metabolism to inactive metabolites excreted by the kidney.

Clinical Issues Related to Metabolism and Elimination

The complexity of the metabolism of fluoxetine has several consequences that may potentially affect the clinical use of SYMBYAX.

Variability in metabolism — A subset (about 7%) of the population has reduced activity of the drug metabolizing enzyme CYP2D6. Such individuals are referred to as "poor metabolizers" of drugs such as debrisoquin, dextromethorphan, and the tricyclic antidepressants (TCAs). In a study involving labeled and unlabeled enantiomers administered as a recember, these individuals metabolized S-fluoxetine at a slower rate and thus achieved higher concentrations of S-fluoxetine. Consequently, concentrations of S-norfluoxetine at steady state were lower. The metabolism of R-fluoxetine in these poor metabolizers appears normal. When compared with normal metabolizers, the total sum at steady state of the plasma concentrations of the 4 enantiomers was not significantly greater among poor metabolizers. Thus, the net pharmacodynamic activities were essentially the same. Alternative nonsaturable pathways (non-CYP2D6) also contribute to the metabolism of fluoxetine. This explains how fluoxetine achieves a steady-state concentration rather than increasing without limit.

Because the metabolism of fluoretine, like that of a number of other compounds including TCAs and other selective serotonin antidepressants, involves the CYP2D6 system, concomitant therapy with drugs also metabolized by this enzyme system (such as the TCAs) may lead to drug interactions (see Drug Interactions (7.19 and 7.25)).

Accumulation and slow elimination — The relatively slow elimination of fluoxetine (elimination half-life of 1 to 3 days after south administration and 4 to 6 days after chronic administration) and its active metabolite, norfluoxetine (elimination half-life of 4 to 16 days after acute and chronic administration), leads to significant accumulation of these active species in chronic use and delayed attainment of steady state, even when a fixed dose is used. After 30 days of dosing at 40 mg/day, plasma concentrations of fluoxetine in the range of 91 to 302 ng/mL and norfluoxetine in the range of 72 to 258 ng/mL have been observed. Plasma concentrations of fluoxetine were higher than those predicted by single-dose studies, because the metabolism of fluoxetine is not proportional to dose. However, norfluoxetine appears to have linear pharmacokinetics. Its mean terminal half-life after a single dose was 8.6 days and after multiple dosing was 9.3 days. Steady-state levels after prolonged dosing are similar to levels seen at 4 to 5 weeks.

The long elimination half-lives of fluoretine and norfluoretine assure that, even when dosing is stopped, active drug substance will persist in the body for weaks (primarily depending on individual patient characteristics, previous desing regimen, and length of previous therapy at discontinuation). This is of potential consequence when drug discontinuation is required or when drugs are prescribed that might interact with fluoretine and norfluoretine following the discominuation of fluoretine.

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 8 2007

12.4 Special Populations

Geriatric — Based on the individual pharmacokinetic profiles of clanzapine and fluoxetine. The pharmacokinetics of SYMBYAX may be altered in geriatric patients. Caution should be used in dosing the elderly, especially if there are other factors that might additively influence drug metabolism and/or pharmacodynamic sensitivity.

In a study involving 24 healthy subjects, the mean elimination half-life of clanzapine was about 1.5 times greater in elderly subjects (>65 years of age) than in non-elderly subjects (\$65 years of age).

The disposition of single doses of fluoxetine in healthy elderly subjects (>65 years of ago) did not differ significantly from that in younger normal subjects. However, given the long half-life and nonlinear disposition of the drug, a single-dose study is not adequate to rule out the possibility of altered pharmacokinetics in the elderly, particularly if they have systemic illness or are recaiving multiple drugs for concomitant diseases. The effects of ago upon the metabolism of fluoxetine have been investigated in 260 elderly but otherwise healthy depressed patients (260 years of ago) who received 20 mg fluoxetine for 6 weeks. Combined fluoxetine plus norfluoxetine plasma concentrations were 209.3 ± 85.7 mg/mL, at the end of 6 weeks. No unusual age-associated patient of adverse events was observed in those elderly patients.

Renal Impairment — The pharmacokinetics of SYMBYAX has not been studied in patients with renal impairment.

However, clanzapine and fluoxetine individual pharmacokinetics do not differ significantly in patients with renal impairment.

SYMBYAX dosing adjustment based upon renal impairment is not routinely required.

Hecause olangapine is highly metabolized before excretion and only 7% of the drug is excreted unchanged, renal dysfunction alone is unlikely to have a major impact on the pharmacokinetics of olangapine. The pharmacokinetic characteristics of olangapine were similar in patients with severe renal impairment and normal subjects, indicating that dosage adjustment based upon the degree of renal impairment is not required. In addition, olangapine is not removed by dialysis. The effect of renal impairment on olangapine metabolite elimination has not been studied.

In depressed patients on dialysis (N=12), fluoxetine administered as 20 mg once daily for 2 months produced steady-state fluoxetine and norfluoxetine plasma concentrations comparable with those seen in patients with normal renal function. While the possibility exists that renally excreted metabolites of fluoxetine may accumulate to higher levels in patients with severe renal dysfunction, use of a lower or less frequent dose is not routinely necessary in renally impaired patients.

Hepatic Impairment — Based on the individual pharmacokinetic profiles of clanzapine and fluoxetine, the pharmacokinetics of SYMBYAX may be altered in patients with hepatic impairment. The lowest starting dose should be considered for patients with hepatic impairment (see Warnings and Precautians (5.19) and Dasage and Administration (2.3)).

Although the presence of hepstic impairment may be expected to reduce the clearance of olanzapine, a study of the effect of impaired liver function in subjects (N=6) with clinically significant clinhosis (Childs-Pugh Classification A and B) revealed links effect on the pharmacokinetics of olanzapine.

As might be predicted from its primary site of metabolism, liver impairment can affect the elimination of fluoretine. The elimination half-life of fluoretine was prolonged in a study of cirrhotic patients, with a mean of 7.6 days compared with the range of 2 to 3 days seen in subjects without liver disease: norfluoretine elimination was also dolayed, with a mean duration of 12 days for cirrhotic patients compared with the range of 7 to 9 days in normal subjects.

Gender — Clearance of olanzapine is approximately 30% lower in women than in men. There were, however, no apparent differences between men and women in effectiveness or adverse effects. Dosago modifications based on gender should not be needed.

Smoking Status — Olanzapine clearance is about 40% higher in smokers than in nonsmokers, although dosage modifications are not routinely required.

Race — No SYMBY AX pharmacokinetic study was conducted to investigate the effects of race. Results from an clanzapine cross-study comparison between data obtained in Japan and data obtained in the US suggest that exposure to clanzapine may be about 2-fold greater in the Japanese when equivalent doses are administered. Olanzapine clinical study safety and efficacy data, however, did not suggest clinically significant differences among Caucasian patients, parients of African descent, and a 3rd pooled category including Asian and Hispanic patients. Dosage modifications for race, therefore, are not routinely required.

Combined Effects — The combined effects of age, smoking, and gender could lead to substantial pharmacokinetic differences in populations. The clearance of clanzapine in young smoking males, for example, may be 3 times higher than that in elderly nonsmoking females. SYMBYAX dosing modification may be necessary in patients who exhibit a combination of factors that may result in slower metabolism of the clanzapine component [see Dosage and Administration (2.3)].

13 NONCLINICAL TOXICOLOGY

13.1 Carcinogeoesis, Mutagenesis, Impairment of Fertility

No carcinogenicity, mutagenicity, or festility studies were conducted with SYMBYAX. The following data are based on findings in

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 6 2007

Olanzapine - Oral curcinogenicity studies were conducted in mice and rats. Olanzapine was administered to mice in two 78-week studies at doses of 3, 10, and 30/20 mg/kg/day [equivalent to 0.8 to 5 times the maximum recommended human daily dose (MRHD) on a mg/m2 basis] and 0.25, 2, and 8 mg/kg/day (equivalent to 0.06 to 2 times the MRHD on a mg/m2 basis). Rats were dosed for 2 years at doses of 0.25, 1, 2.5, and 4 mg/kg/day (males) and 0.25, 1, 4, and 8 mg/kg/day (females) (equivalent to 0.1 to 2 and 0.1 to 4 times the MRHD on a mg/m2 basis, respectively). The incidence of liver hemangiomas and hemangiosaucomas was significantly increased in one mouse study in females dosed at 8 mg/kg/day (2 times the MRHD on a mg/m² basis). These tumors were not increased in another mouse study in females dosed at 10 or 30/20 mg/kg/day (2 to 5 times the MRHD on a mg/m2 basis); in this study, there was a high incidence of early mortalities in males of the 30/20 mg/kg/day group. The incidence of mammary gland adenomis and adenocerclnomis was significantly increased in female mice dosed at 22 mg/kg/day and in female rats dosed at 24 mg/kg/day (0.5 and 2 times the MRHD on a mg/m2 basis, respectively). Antipsychotic drugs have been shown to chronically elevate prolactin levels in rodents. Sorum prolactin levels were not measured during the clanzapine carcinogenicity studies; however, measurements during subchronic toxicity studies showed that clanzapine elevated serum prolactin levels up to 4-fold in rats at the same doses used in the carelnogenicity study. An increase in mammary gland neoplasms has been found in rodents after chronic administration of other amipsychotic drugs and is considered to be prolactin-mediated. The relevance for human risk of the finding of prolactin-mediated endocrine rumors in rodents is unknown [see Warning and Precautions (5.20)].

Fluoretine - The dietary administration of fluoretine to rets and mice for two years at doses of up to 10 and 12 mg/kg/day, respectively (approximately 1.2 and 0.7 times, respectively, the MRHD on a mg/m2 basis), produced no evidence of carcinogenicity.

Mutagenesh

Olanzapine - No evidence of mutagenic potential for olanzapine was found in the Ames reverse mutation test, in vivo mioronucleus test in mice, the chromosomal aberration test in Chinese hamster ovary cells, unscheduled DNA synthesis test in rat hepatocytes, induction of forward mutation test in mouse lymphoma cells, or in vivo sister chromatid exchange test in bone marrow of Chinese hamsters.

Fluoretine - Fluoretine and norfluoretine have been shown to have no genotoric effects based on the following assays: bacterial mutation assay, DNA repair assay in cultured tar hepatocytes, mouse lymphoma assay, and in vivo sister chaomatid exchange assay in Chinese humster bone marrow cells.

Impairment of Fertility

SYMBYAX - Fentility studies were not conducted with SYMBYAX. However, in a repent-dose rat toxicology study of three months duration, overy weight was decreased in females treated with the low-dose [2 and 4 mg/kg/day (1 and 0.5 times the MRHD on a mg/m3 basis), respectively] and high-dose [4 and 8 mg/kg/day (2 and 1 times the MRHD on a mg/m3 basis), respectively] combinations of clanzapine and fluoxetine. Decreased overy weight, and corpora luteal depiction and uterine atrophy were observed to a greater extent in the females receiving the high-dose combination than in females receiving either olanzapine or fluoxetine alone. In a 3-month repeat-dose dog taxicology study, reduced epididymal sperm and reduced testicular and prostate weights were observed with the high-doze combination of clanzapine and fluoxetine (5 and 5 mg/kg/day (9 and 2 times the MRHD on a mg/m2 basis), respectively] and with olanzapine alone (5 mg/kg/day or 9 times the MRHD on a mg/m2 basis).

Olsuzapine - In a fertility and reproductive performance study in rate, male mating performance, but not fertility, was impaired at a dose of 22.4 mg/kg/day and female fertility was decreased at a dose of 3 mg/kg/day (11 and 1.5 times the MRHD on a mg/m' basis, respectively). Discominuance of clanzapine treatment reversed the effects on male-mating performance. In female rats, the precoital period was increased and the moting index reduced at 5 mg/kg/day (2.5 times the MRHD on a mg/m2 basis). Diestrous was prolonged and estrous was delayed at 1.1 mg/kg/day (0.6 times the MRHD on a mg/m2 basis); therefore, clanzapine may produce a delay in ovulation.

Fluoretine - Two fertility studies conducted in adult rats at doses of up to 7.5 and 12.5 mg/kg/day (approximately 0.9 and 1.5 times the MRHD on a mg/m2 basis) indicated that fluoretine had no adverse effects on fentility (see Use in Specific Populations (8.4)].

CLINICAL STUDIES 14

14.1 Bipolar Depression

The efficacy of SYMBYAX for the treatment of depressive episodes associated with bipolar disorder was established in 2 identically designed, B-week, randomized, double-blind, controlled studies of patients who met Diagnostic and Statistical Manual 4th edition (DSM-IV) criteria for Bipolar I Disorder, Depressed utilizing flexible dosing of SYMBYAX (6/25, 6/50, or 12/50 mg/day). olanzapine (5 to 20 mg/day), and placebo. These studies included patients (218 years of ago (n=788) with or without psychotic symptoms and with or without a rapid cycling course.

> Exhibit A, Page 30 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 2 6 2007

The primary rating instrument used to assess depressive symptoms in these studies was the Montgomery-Asberg Depression Rating Scale (MADRS), a 10-item clinician-rated scale with total scores ranging from 0 to 60. The primary outcome measure of these studies was the change from baseline to endpoint in the MADRS total score. In both studies, primary outcome measure of these studies was the change from baseline to endpoint in the MADRS total score. In both studies, primary outcome measure of these studies was the change from baseline to endpoint in the MADRS total score. The results of the studies are communiced bolow (Table 3).

Toble 24 MADRS Total Score

Meso Change from Bosoline to Endpoint

		Maried Charles II can act	Change to Endpoint Mean'
	Treatment Group	Sascilac Micas	Committee of the commit
Srudy 1 SYMBYAX -(N=40)	The state of the s	70	46"
	Olancapino -(N-183)	3-3	42
Placebo -(N=181)		34	-40
Smody-3 SYMBYAX -(N=42) Olemanpine -(N=169) Placebo -(N=174)		3-3	-18*
		33	-14
	Placebo -(N=174)	34	-9

Diegeline number denotes Improvement from baseline.

14.2 Treatment Resistant Depression

[We have revised the following section to more accurately reflect the data used to pasers efficacy.]

The efficacy of SYMBYAX in treatment resistant depression was demonstrated with data from \$-1 clinical studies (n=579) (Table 3). Doses evaluated in these studies ranged from 65-18-20 mg for planzapine and 2520-50-60 mg for fluoxetine.

Two identically designed at 8-week randomized, double-blind controlled studyies (Study 1 and 5) w waster conducted to evaluate the efficacy of SYMBYAX in patients (11 = 300) who met DSM-IV criteria for major depressive disorder and did not respond to 2 antidepressants of adequate dose and duration in their current episodo (N=605). Patients who were not responding to an antidepressant in their current episode entered an 8-week open-label fluoxetine lead-in; non-responders were randomized (1:1:1) to receive SYMBYAX, olanzapine, or fluoxetine, and were treated for 8 weeks. SYMBYAX was flexibly dosed between 6/50 mg. 12/50 mg, and 18/50 mg. Results from one (Study 1) of class 2 studiesthis study yielded statistically significant greater reduction (p=0.001) in mean total MADRS scores from baseline to endpoint for SYMBYAX (-14.6) versus fluoxetine (-9.0) and olanzapine (-7.7). A second study with the same treatment-resistant patient population (n=28), when analyzed with change in MADRS as the primary outcome measure, demonstrated statistically significantly greater reduction in MADRS scores for SYMBYAX versus fluoxetine and olanzapine. Additionally A third study-3 similarly designed studies (Study 2, 3, and 4) of 8-13 weeks duration (n=28, 251, 269, respectively) demonstrated statistically significantly greater reduction in total MADRS scores for SYMBYAX versus fluoxetine (p=0.012, 0.021, 0.106) and or olanzapine alone (p=0.035, 0.007) respectively, when analyzed for the semoin a subpopulation of depressed patients (n=251) who met the definition of treatment resistance (patients who were had not responding responded to 2 antidepressants of adequate dose and duration, both design in the current episodo).

An integrated analysis of the Scholins yielded statistically significant greater reduction in mean total MADRE scores from besoline to endpoint in the defined population (p=0.015, p=0.007 versus fluoretine and clanzapine, respectively) for SYMBYAX (12.2) versus fluoretine (8.5) and clancapine (-7.7).

Teble J. MADRE Total Score

Mena Chasgo from Bassiles to Endpoint in

Tecoment Resistant Depression

MAR 2 8 2007

G. Brophy

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

[&]quot;-Statistically nignificent compared to both cleasupine and placeber

27					
	Treesment Group	Bestine Mean	Ghause to Godpoist Manu		
Stody-1	SYMBYAX (N=97) Pleosetino (N=101) Olanzapino (N=102)	30.6 30.1 30.1	-14-6 -9.01 -7.78		
Study 2	SYMBVAX (N-10) Flooring (N-10) Olensopine (N-1)	29.5 23.8 25.0	-5-83 -1-3x -1-5-6		
Sunda-3	SYMBYAX (N:163)	30.1	-13.3		

	Olansopine (N-8)	25.0	-2.81	
Suidy-3	SYMBYAX (N:-163)	30.1	-13-3	
	Fluoredino (N=41)	31.1	-10.0s	
	Closcapine (N=17)	34.5	-8.8*	
Study 4	SYMBYAX (N-91)	29,4	-9.0	
unacy .	Fluoretine (N=88)	58-9	-7.0±4	
	Olanaspins (N=90)	28.4	-5.70	
Surby 5	SYMBYAX (N=101)	39.5	-10.8	
	Fluoretine (N:-102)	29.7	-9.422	
	Olencopino (N=95)	29.7	-10,1**	
Integrated	EXNUBYAX (NI-062)	29.9	-12.3	
analysis-of	Fluereline (N=342)	20.6	-8:54	

29.6

Piegative number denotes improvement from basellus.

Fluencine (N=342)

Olanzapine (N=342)

analysis-of

5 acudios

1 SYNABYAX statistically significant (p. 0.05) compared to fluoratine and clanzapine.

7.74

HOW SUPPLIED/STORAGE AND HANDLING 16

SYMBYAX capsules are supplied in 3/25-, 6/25-, 6/50-, 12/25-, and 12/50-mg (mg equivalent clanzapine/mg equivalent fluoxetine") strengths.

SYMBYAX	CAPSULE STRENGTH				
	3 mg/25 mg	6 mg/25 mg	8 mg/50 mg	12 mg/25 mg	12 mg/50 mg
Color	Peach	Mustard Yellow	Mustard Yellow	Red & Light	Red & Light
	& Light Yellow	& Light Yellow	& Light Grey	Yellow	Grey
Capsule No.	PU3230	PU3231	PU3233	PU3232	PU3234
Identification	Lilly 3230	Lilly 3231	Lilly 3233	Lilly 3232	Lilly 3234
	3/25	6/25	8/50	12/25	12/50
NDC Codes					
Bottles 30	0002-3230-30	0002-3231-30	0002-3233-30	0002-3232-30	0002-3234-30
Bottles 100		0002-3231-02	0002-3233-02	0002-3232-02	0002-3234-02
Bottles 1000		0002-3231-04	0002-3233-04	0002-3232-04	0002-3234-04
Blisters ID 100		0002-3231-33	0002-3233-33	0002-3232-33	0002-3234-33

IDENTI-DOSE®, Unit Dose Medication, Lilly.

MAR 2 6 2007

G. Brophy

Exhibit A, Page 32 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

^{**} SVAIDYAX demandrated a ground reduction in total MADRS seems, however did not comb statistical significance (p-0.05)

P.11/14

28

Store at 25°C (77°F); excursions permitted to 15-30°C (59-86°F) [see USP Controlled Room Temperature]. Keep tightly closed and protect from moisture.

PATIENT COUNSELING INFORMATION 17

Information for Patients 17.1

Prescribers or other health professionals should inform patients, their families, and their caregivers about the benefits and risks associated with treatment with SYMBYAX and should counsel them in its appropriate use. A patient Medication Guide About Using Antidepressants in Children and Teenagers is available for SYMBYAX. The prescriber or health professional should instruct patients, their families, and their coregivers to road the Medication Gulde and should assist them in understanding its contents. Patients should be given the opportunity to discuss the contents of the Medication Guide and to obtain answers to any questions they may have. The complete text of the Medication Guide is reprinted at the end of this document.

Patients should be advised of the following issues and asked to alen their prescriber if these occur while taking SYMBYAX.

Patients should be cautioned about the concomitant use of SYMBYAX and NSAIDs, aspirin, or other drugs that affect coagulation since the combined use of psychotropic drugs that interfere with scrotonin reuptake and these agents has been associated with an increased risk of bleeding [see Wornings and Precoutions (5.15)].

Patients should be advised to avoid alcohol while taking SYMBYAX.

As with any CNS-active drug, SYMBYAX has the potential to impair judgment, thinking, or motor skills. Potients should be cautioned about operating hazardous machinery, including automobiles, until they are reasonably certain that SYMBYAX therapy does not affect them adversely.

Patients should be advised to inform their physician if they are taking Prozac ", Prozac Weekly", Sarafem", fluoxetine, Zyprexa, or Zyprexa Zydis. Patients should be advised to inform their physicians if they are taking or plan to take any prescription or over-the-counter drugs, including herbal supplements, since there is a potential for interactions. Patients should also be advised to inform their physicians if they plan to discontinue any medications they are taking while taking SYMBYAX, as stopping a medication may also impact the overall blood level of SYMBYAX.

Patients should be advised regarding appropriate care in avoiding overheating and dehydration.

Patients, if taking SYMBYAX, should be advised not to breast-feed.

Patients should be advised of the risk of orthostatic hypotension, especially during the period of initial dose titration and in association with the use of concomitant drugs that may potentiate the orthostatic effect of clanzapine, e.g., diazepam or alcohol [see Warnings and Precautions (5.10) and Drug Interactions (7)].

Patients should be advised to notify their physician if they become pregnant or intend to become pregnant during SYMBYAX therapy.

Patients should be advised to notify their physician if they develop a rash or hives while taking SYMBYAX.

Potients should be advised to take SYMBYAX exactly as prescribed, and to continue taking SYMBYAX as prescribed even after their mood symptoms improve. Patients should be advised that they should not alter their dosing regimen, or stop taking SYMBYAX, without consulting their physician.

Patient information is printed at the end of this insert. Physicians should discuss this information with their patients and instruct them to read the Medication Guide before starting therapy with SYMBYAX and each time their prescription is refilled.

Clinical Worsening and Spicide Risk 17.2

Patients, their families, and their caregivers should be encouraged to be alen to the emergence of anxiety, agitation, panic onacks, insomnia, initability, hostility, aggressiveness, impulsivity, akathisia (psychomotor restleasness), hypomania, mania, other unusual changes in behavior, worsening of depression, and sulcidal ideation, especially early during antidepressant treatment and when the dose is adjusted up or down. Families and caregivers of patients should be advised to observe for the emergence of such symptoms on a day-to-day basis, since changes may be abrupt. Such symptoms should be reponed to the patient's prescriber or health professional, especially if they are severe, abrupt in onset, or were not part of the patient's presenting symptoms. Symptoms such as these may be associated with an increased risk for suicidal thinking and behavior and indicate a need for very close monitoring and

17.3 Serotopin Syndrome

Patients should be cautioned about the risk of serotonin syndrome with the concomitant use of SYMBYAX and triptans, tramadol or 17.4

PDA Approved Medication Guide

MAR = 6 2007

G. Brophy

Exhibit A, Page 33 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

P. 12/14

29

Medication Guide

About Using Antidepressants in Children and Teenagers

What is the most important information i should know if my child is being prescribed an antidepressant?

Parents or guardians need to think about 4 important things when their child is prescribed an antidepressant:

- 1. There is a risk of suicidal thoughts or actions
- 2. How to my to prevent suicidal thoughts or actions in your child
- 3. You should watch for certain signs if your child is taking an antidepressant
- 4. There are benefits and risks when using antidepressants

1. There is a Risk of Suicidal Thoughts or Actions

Children and teenagers sometimes think about suicide, and many report trying to kill themselves.

Antidepressants increase suicidal thoughts and actions in some children and teenagers. But suicidal thoughts and actions can also be caused by depression, a serious medical condition that is commonly treated with antidepressants. Thinking about killing yourself or trying to kill yourself is called suicidality or being suicidal.

A large study combined the results of 24 different studies of children and teenagers with depresalon or other illnesses. In these studies, patients took either a placebo (sugar pill) or an antidepressant for 1 to 4 months. No one commuted suicide in these studies, but some patients became suicidal. On sugar pills, 2 out of every 100 became suicidal. On the antidepressants, 4 out of every 100 patients became suicidal.

For some children and teenagers, the risks of suicidal actions may be especially high. These include patients with

- · Blpolar Illness (sometimes called munic-depressive illness)
- · A family history of bipolar illness
- · A personal or family history of attempting suicide

If any of these are present, make sure you tell your health care provider before your child takes an antidepressant.

2. How to Try to Prevent Suicidal Thoughts and Actions

To try to prevent suicidal thoughts and actions in your child, pay close attention to changes in her or his moods or actions, especially if the changes occur suddenly. Other important people in your child's life can help by paying attention as well (e.g., your child, brothers and sisters, teachers, and other important people). The changes to look out for are listed in Section 3, on what to watch for.

Whenever an antidepressant is started or its dose is changed, pay close attention to your child.

After starting an antidepressant, your child should generally see his or her health care provider

- . Once a week for the first 4 weeks
- Every 2 weeks for the next 4 weeks
- After taking the antidepressant for 12 weeks.
- . After 12 weeks, follow your health care provider's advice about how often to come back
- · More often if problems or questions arise (see Section 3)

You should call your child's health care provider between visits if needed.

J. You Should Watch for Certain Signs If Your Child is Taking an Antidepressant

Contact your child's health care provider right away if your child exhibits any of the following signs for the first time, or if they seem worse, or worry you, your child, or your child's teacher:

SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI MAR \$ 3 2007

30

- · Thoughts about suicide or dying
- Attempts to commit suicide
- New or worse depression
- New or worse anxiety
- Feeling very agitated or restless
- Panic attacks
- Difficulty sleeping (insomnia)
- · New or worse irritability
- · Acting aggressive, being angry, or violent
- Acting on dangerous impulses
- · An extreme increase in activity and talking
- Other unusual changes in behavior or mood

Never let your child stop taking an antidepressant without first talking to his or her health care provider. Stopping an antidepressant suddenly can cause other symptoms.

4. There are Benefits and Risks When Using Antidepressants

Antidepressents are used to treat depression and other Illnesses. Depression and other illnesses can lead to suicide. In some children and teenagers, treatment with an antidepressant increases sulcidal thinking or actions. It is important to discuss all the risks of treating depression and also the risks of not treating it. You and your child should discuss all treatment choices with your health care provider, not just the use of antidepressants.

Other side effects can occur with antidepressants (see section below).

Of all the antidopressants, only fluoretine (Prozac[®]) has been FDA approved to treat pediatrio depression.

For obsessive compulsive disorder in children and teenagers, FDA has approved only fluoxetine (Prozace), sentraline (Zoloffe). fluvoxamine, and clomipramine (Anafranil").

Your health care provider may suggest other antidepressants based on the past experience of your child or other family members,

is this all I need to know if my child is being prescribed an antidepressant?

No. This is a warning about the risk for suicidality. Other side effects can occur with antidepressants. Be sure to ask your health care provider to explain all the side offects of the particular drug he or she is prescribing. Also ask about drugs to avoid when taking an antidepressant. Ask your health care provider or pharmacist where to find more information.

Prozec is a registered trademark of Eli Lilly and Company.

Zoloft⁹ is a registered trademark of Pfizer Pharmaceuticals.

Anafranil® is a registered trademark of Mallinckrodt Inc.

This Medication Guide has been approved by the US Food and Orug Administration for all antidepressants. Ra only

Literature revised September 8, 2008

Ell Lilly and Company Indianapolis, IN 48285

WWW.SYMBYAX.com

BNL 5412 AMP Copyright © 2003, 2006

PRINTED IN USA

MAR 2 0 2007 Exhibit A, Page 35 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments

Case No. 3AN-06-5630 CI

G. Brophy

Unsealed in Alaska v. Lilly 3AN 06-5630 CIV

P. 14/14

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

18/

Thomas Laughren 3/28/2007 02:51:39 PM

Exhibit A, Page 36 of 36 SOA Response to Lilly Motion in Limine Regarding Recent Regulatory Communications and Developments Case No. 3AN-06-5630 CI

MAR 1 5 2007 G. Brophy

Unsealed in Alaska v. Lilly 3AN 06-5630 CIV

006224

TOTAL P.14