1 any of those criteria.

So I think we are going to have -
I'm not sure if it's a surrogate as much as

it's just a -- it's a biomarker. It's the

resolution of an arrhythmia, or a resolution

of an EKG finding in some patients.

In others, it may be -- it may fulfill the criteria that it is actually a clinical endpoint. People feel bad, you take them out of it, and they feel better. That, to me, is an important clinical outcome.

12 CHAIR HIATT: Yes, that's a very
13 important interpretation.

14 Comments?

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DR. LINCOFF: I think what makes it a surrogate is the time point. So if you are saying at one hour, then that is a surrogate.

I don't think there is any question that afib is a disease. I mean, if we said we've got a drug that converts diabetes to normal, no one would question that diabetes is an endpoint, even if it's asymptomatic in many cases. Or

- 1 maybe I should say hypertension.
- 2 Hypertension leads to --
- 3 CHAIR HIATT: Well, be careful,
- 4 Michael. There's a slippery slope there.
- 5 (Laughter)
- 6 DR. LINCOFF: Right. No, diabetes
- is a poor analogy. But hypertension, because
- 8 hypertension is asymptomatic until it causes
- 9 a mortal and morbid -- a mortal or morbid
- 10 endpoint, like stroke.
- 11 Well, so atrial fibrillation may
- be asymptomatic, even for the patients who
- are not feeling it, until it causes a
- 14 embolization or a hemodynamic compromise.
- So I don't think, at least from my
- 16 standpoint, atrial fibrillation is a
- surrogate, but whether you've converted it in
- an hour or two hours or 24 hours, I think
- 19 that could reasonably be considered a
- 20 surrogate.
- 21 CHAIR HIATT: Well, the question
- 22 begs truly the thing you just kind of hit on,

1 which is that, and again, this committee has 2. debated this. You know, we discussed, in a couple of meetings, the fact that blood 3 pressure is a surrogate endpoint that is 5 directly linked to clinical outcome, as you lower the blood pressure. 7 The same is true for LDL cholesterol. 9 The question is, is that true for 10 atrial fibrillation. Yes, it's a disease, 11 it's an arrhythmia. But the question is, by 12 converting, you'll see the questions that 13 come up later today, are there clinical consequences that are beneficial to that 14 conversion. 15 And we've discussed a fair amount 16 17 already this morning. There are symptomatic benefits in certain patients, but are there 18 morbid, mortal benefits? Or are there 19 avoidance of harm benefits that occur by 20 21 conversion of that endpoint?

Neal R. Gross and Co., Inc. 202-234-4433

DR. CANNON: I think it depends on

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the underlying heart disease. So we know 1 2 that, for many patients, lone atrial fibrillation in relatively young people, it's 3 4 relatively benign if it's not causing 5 symptoms. But for older people, or people 7 with serious structural heart disease, it can be a big problem, particularly if weight 8 9 control is not well attended to. It can 10 exacerbate heart failure for patients who 11 have stiff hearts. It can obviously 12 contribute to symptoms. 13 And we know overall atrial fibrillation has a mortality risk that is far 14 15 greater than people in sinus rhythm, no question about that. But in large part, 16 17 that's because of the underlying structural heart disease. 18 19 CHAIR HIATT: Okay, so two 20 comments. 21 One is, you brought up this

morning a lot of consideration for specific

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1 So that's a theme I think the subgroups. 2. committee needs to continue to keep in mind, 3 that maybe not all AF is the same. 4 So let's be mindful of that. 5 then I think the second thing is, remember, the natural history of any risk factor 7 doesn't make it necessarily a viable surrogate or not. So that maybe raising HDL 8 9 cholesterol is not a good thing with the 10 drug, though it's a huge risk factor for 11 events. 12 So the same is true for type II 13 diabetes. So I think we should be careful that, if we are going to treat a surrogate, 14 15 we are assuming there is a relationship between treating that endpoint, and a 16 17 clinically relevant outcome. 18 That's the question that was 19 posed. DR. CANNON: But again, I think you 20 21 can't dissociate that from the underlying heart disease, the context in which that 22

1 atrial fibrillation exists.

2 CHAIR HIATT: Exactly. So your
3 point then is to be retained is that there
4 may be very relevant subgroups under this
5 broad definition of atrial fibrillation.

DR. MASSIE: I took the surrogate a little bit, maybe wrongly, as the particular endpoint of demonstrating conversion for 60 seconds, and is a surrogate, for even knowing whether they are in afib, very much down the line.

So I think there are two levels.

The specific way in which it was defined clearly is telling you something about the effect of the acute therapy, but certainly not even about the effect of the -- now on the natural history of atrial fibrillation, much less the complication stuff.

But I would say, another thing is if you really could get somebody out of afib and know they weren't going to get in, then it would probably mean something. It's

- probably related to the underlying condition that would allow that or not.
- I believe that the number of

  medicines that are given for atrial fib,

  avoiding them itself is a positive outcome.
- 6 So it's not -- so in a sense, it's a
- 7 surrogate for not taking dangerous drugs.
- 8 CHAIR HIATT: Okay, so keep in mind
  9 what you think that endpoint means. Clearly,
  10 is it a surrogate for a durable conversion at
  11 24 hours seems to be very good. But the
  12 question posed, is it a surrogate for
  13 clinically meaningful endpoints, and I would

include those as symptomatic endpoints, and

- as morbid mortal endpoints.

  DR. HARRINGTON: And so could we
  agree on the phrase that we are going to call
  the resolution a biomarker, because it's not
- 19 yet proven to be a surrogate? The surrogate

thing bothers me.

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21 CHAIR HIATT: Well, I think the 22 concepts are out there. So it's a little

- 1 past the time for the discussion on the
- 2 general topic.
- Norman, do you have any other
- 4 issues you'd like us to clarify?
- 5 DR. STOCKBRIDGE: No, I think
- 6 that's been a very good thing to set the
- 7 stage for what comes next.
- 8 CHAIR HIATT: Steven Findlay, could
- 9 you introduce yourself?
- MR. FINDLAY: Yes, I'm Steven
- 11 Findlay. I'm the consumer representative on
- this panel.
- 13 CHAIR HIATT: And I know it's a
- mundane issue, but the committee has to
- 15 circle their menu for their lunch vote. We
- 16 remain anonymous until it's presented on the
- 17 projector up here. Put your name on, too, so
- that way nothing is truly anonymous.
- 19 Before the sponsor starts, is
- anyone needing of a break? Consensus? Want
- 21 to move on?
- We're moving on.

1	So next we will have an
2	introduction about the development program.
3	Dr. Raineri.
4	ASTELLAS PHARMACY US, INC. PRESENTATION
5	INTRODUCTION
6	DR. RAINERI: Good morning, Dr.
7	Hiatt, committee members, FDA participants,
8	and guests.
9	My name is Don Raineri. I'm a
10	senior director of regulatory affairs for
11	Astellas Pharma US.
12	On behalf of Astellas and our
13	development partner, Cardiome, I'd like to
14	thank you for this opportunity to present and
15	discuss the data for vernakalant
16	hydrochloride injection, also known as
17	Kynapid, which is a novel intravenous anti-
18	rhythmic agent for the rapid conversion of
19	atrial fibrillation to sinus rhythm.
20	Based on the data that you will
21	see this morning, we have proposed the
22	following indication. Vernakalant injection

is indicated for the rapid conversion of 1 2. atrial fibrillation of less than or equal to 3 seven days duration to sinus rhythm. 4 The proposed dosing for 5 vernakalant injection is an initial infusion of three milligrams per kilogram infused over 7 10 minutes. If conversion to sinus rhythm does 8 9 not occur within 15 minutes after the end of 10 the initial infusion, then a second 10-minute 11 infusion of two milligrams per kilogram may be administered. 12 13 This slide shows the key attributes of vernakalant injection. 14 15 will see data this morning which shows that vernakalant provides for rapid conversion of 16 atrial fibrillation to sinus rhythm, as well 17 as effective reduction of the symptoms 18 associated with atrial fibrillation. 19 In addition, sinus rhythm is 20 maintained out to 24 hours. 21

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Vernakalant injection can be used

- with rate or rhythm control medication if required without affecting safety or efficacy.
- In our presentation today, we'll

  provide you with data which shows that

  vernakalant injection has a well

  characterized safety profile, as well as a

  favorable risk-benefit profile.
- 9 When taken together, these data 10 show that vernakalant injection provides an 11 important treatment alternative for patients 12 with acute symptomatic atrial fibrillation.
- This is our program for today.
- Pritchett, from Duke University, will present a clinical overview of atrial fibrillation,

Following my introduction, Dr. Edward

- 17 and the medical need for vernakalant
- 18 injection.

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- Dr. Greg Beatch, from Cardiome,
  will then present the mechanism of action of
  vernakalant.
- 22 Dr. James Kerns, from Astellas,

- will follow with the toxicology and clinical 1 2. pharmacology of vernakalant. Dr. Therese Kitt, from Astellas, will then present the 3 4 clinical efficacy and safety data for 5 vernakalant injection, as well as our 6 proposal for risk management. 7 And Dr. Jeremy Ruskin, from 8 Massachusetts General Hospital, will conclude 9 with a risk-benefit summary of vernakalant 10 injection. 11 These are the consultants who have 12 worked with us throughout the development 13 program for vernakalant injection, and we are pleased to have them with us today to respond 14 to questions from the committee. 15
- In addition to Dr. Pritchett and
  Dr. Ruskin, we are pleased to have with us
  today Dr. David Fedida, Dr. Peter Kowey, and
  Dr. Craig Pratt.

In addition, we have the following internal experts available from Astellas and Cardiome to respond to questions.

1	At this time, I'd like to turn the
2	presentation over to Dr. Edward Pritchett to
3	present the clinical overview of atrial
4	fibrillation, and the medical need for
5	vernakalant injection.
6	CLINICAL OVERVIEW OF ATRIAL FIBRILLATION
7	DR. PRITCHETT: Thank you, and good
8	morning.
9	My remarks will be very brief.
10	I just want to remind you that
11	atrial fibrillation is a big problem. It is
12	the most common sustained cardiac arrhythmia
13	in the United States, and it is the most
14	common diagnosis for arrhythmia-related
15	hospitalization in the United States.
16	There are about 2.3 million U.S.
17	adults who carry a diagnosis of atrial
18	fibrillation now, and that number will
19	increase as the population ages.
20	The clinical presentation of
21	atrial fibrillation is now largely with
22	symptoms. It is most commonly identified

1 because patients show up complaining about 2. symptoms. The cardiovascular health study is a large, multi-center epidemiology study that 3 4 is looking at the incidence of heart disease. 5 And they have reported that 80 percent of the patients with atrial fibrillation that they 7 identify are identified because they have symptoms. So this is largely a discussion 8 9 about symptoms, as the committee has alluded 10 to. 11 In fact, the most appropriate use 12 of antiarrhythmic drugs in patients with 13 atrial fibrillation is for relief of symptoms, as discussed in the guidelines and 14 in recent review articles. 15

And there are lots of symptoms
that are closely associated with the
occurrence of atrial fibrillation. And I've
listed in the third bullet the symptoms that
were collected in the flecainide atrial
fibrillation program almost 20 years ago, in
which over 3,000 patients, or over 3,000

- episodes of atrial fibrillation were

  documented by trans-telephonic monitoring,

  and patients volunteered the symptoms that

  they had.
- And those symptoms were compiled
  by Ani Bhandari after that program, and have
  been published. And those symptoms have now
  been reduced to a number of checklists that
  have been used in antiarrhythmic drug
  development programs, including the program
  that you will see today.

12 Indeed, the history of all 13 antiarrhythmic drug development is largely a symptom-driven history. Prior to 1986, most 14 15 drug development programs for antiarrhythmic drugs concentrated on drugs for ventricular 16 arrhythmias, so we had drugs like 17 disopyramide, like the on 1C drugs, 18 flecainide and encainide, introduced in the 19 20 `70s and early `80s.

In the mid-`80s, there was sort of a shift to interest in developing drugs for supra-ventricular arrhythmias, including
atrial fibrillation, and those development
programs largely used symptomatic arrhythmia
recurrence as an outcome.

5 And these are FDA approval since 1986 for oral drugs for symptomatic 7 arrhythmic recurrence. The first of these is the verapamil program presented to this 8 9 committee in 1984 led to labeling for 10 immediate release verapamil for PSVT in 1986. 11 That was followed by the first multi-center 12 clinical trial program that used symptomatic 13 arrhythmia outcomes, flecainide for PSVT and atrial fibrillation that led to the symptom 14 15 checklists that are being used today.

Then in 1997, propafenone for PSVT
and AF, dofetilide in 1999, d.l. sotalol in
2000, and then in 2003, sustained release
propafenone. Dofetilide in 1999 was also
approved for oral use to convert atrial
fibrillation to sinus rhythm, but the speed
of that is magnitudes difference from an

1 intravenous drug.

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The curious thing is that, during
this 20-year period, there has really been
nothing much done about intravenous therapies
for atrial fibrillation to restore sinus
rhythm.

There is, in fact, only one drug, and that's ibutilide, which was approved and labeled for this indication in 1996, the only drug approved, in fact, in the last 40 years for converting sinus -- atrial fibrillation to sinus rhythm.

13 And this has been a very difficult indication for the pharmaceutical industry to 14 15 crack. So there simply aren't very many intravenous drugs. Drugs can be used off-16 We've heard mention of intravenous label. 17 amiodarone this morning, it's off-label use. 18 And it's gotten mixed reviews in the 19 20 literature with respect to its success.

21 But the bottom line is that we 22 simply don't have a lot of drugs that we can use intravenously for rapid restoration of
sinus rhythm.

So as I said, in summary then, few choices of drugs that are approved and labeled, and they all have imperfect efficacy, and they all have adverse effects.

You all have discussed electrical cardioversion this morning. It does require conscious sedation, it has its own complications, and there are some settings where it is clearly inappropriate.

Therefore, what the cardiology community and patients with atrial fibrillation need is additional choices of drugs that they can use, drugs with a high rate of efficacy for restoring sinus rhythm accompanied by relief of symptoms, and a rapid onset of action, drugs with low rates of adverse effects, a low incidence of drug interactions, and a lack of interference with electrical cardioversion.

That completes my remarks, and I

- will be happy to turn the podium over to my
- 2 colleague, Dr. Beatch.
- 3 MECHANISM OF ACTION
- DR. BEATCH: Thank you, Dr.
- 5 Pritchett.
- 6 Mr. Chairman, members of the
- 7 panel, it's my pleasure to present the
- 8 mechanism of action of vernakalant.
- 9 Vernakalant is a multi-ion channel
- 10 blocker, which blocks potassium channels and
- 11 sodium channels in a manner that is targeted
- 12 to atrial fibrillation.
- 13 Vernakalant produces relatively
- 14 atrial-selective increases in atrial
- 15 refractory periods, and rate dependent
- 16 slowing of conduction velocity, and rapidly
- 17 converts atrial fibrillation.
- 18 Vernakalant's efficacy and safety
- 19 profile are consistent with its ion-channel
- 20 blocking properties.
- 21 Vernakalant blocks potassium
- 22 channels important in control of atrial

repolarization at all phases of the atrial 1 2 action potential, including the transient outward current, the alter-rapid delayed 3 rectifier, the rapid component of the delayed 5 rectifier, and the acetylcholine-dependent potassium channel. 6 7 And it blocks these currents 8 within the therapeutic range of plasma 9 concentrations, which is 2-12 micromolar. 10 In contrast, it does not block the 11 slow component of the delayed rectifier, nor 12 the inward rectifier at therapeutic 13 concentrations. Importantly, it does block the 14 15 ultra rapid component of the delayed rectifier, and the acetylcholine dependent 16 current, which are atrial specific currents. 17 The block of these atrial 18 19 potassium channels is responsible for 20 vernakalant's ability to prolong the action 21 potential duration. 22 In this recent study of tissue

1 taken from patients with atrial fibrillation, 2. and presented at the European Society of 3 Cardiology by Dr. Ravens earlier this year, 4 vernakalant was shown to significantly 5 prolong the action potential duration at 20 percent and 90 percent repolarization. 7 these effects led to increases in the effective refractory period in these atrial 8 9 tissues, which were significant within the 10 therapeutic range of concentrations. 11 Increasing atrial refractoriness 12 has also been shown in the clinical study. 13 As shown here, vernakalant prolongs the atrial refractory period much more markedly 14 15 than it does the ventricular refractory period in man at a pacing rate of 100 beats 16 per minute, and a dose of four milligrams per 17 kilogram. 18 19 This clinical study shows that 20 vernakalant's ion channel blocking profile 21 produces relative, although not absolute, atrial selective eletrophysiologic effects in 22

1 man.

Having discussed vernakalant's

mechanism of action referrable to its

potassium channel blocking, I would now like

to draw your attention to vernakalant's other

mode of action, namely, block of sodium

current.

As can be seen in this study previously referred to, vernakalant produces little effect on a measure of sodium current block in these atrial tissues, and this was the change in voltage over time for the upstroke velocity in the atrial action potentials.

A key feature of vernakalant's mechanism of action in AF is its frequency dependent block of sodium current. These are concentration response relations for vernakalant's block of human heart sodium current under normal conditions, and under the conditions of atrial fibrillation in the atrium.

1 At therapeutic concentrations, 2 shown in the inset, vernakalant produced little block of the sodium current at normal 3 heart rates. When the cells were rapidly 5 paced, vernakalant's potency increased fivefold. 7 As further evidence of vernakalant's potentiated sodium channel 8 9 block in atrial fibrillation, we studied 10 vernakalant's affects on atrial conduction 11 velocity in vivo. Here vernakalant slowed atrial 12 13 conduction at fibrillatory rates in the dog atria. 14 Shown on the Y axis is the 15 changing conduction time, and the increasing 16 pacing rates of simulation in the atria are 17 on the X axis. 18 Vernakalant, at four milligrams 19 20 per kilogram, produced little conduction 21 slowing at 200 beats per minute, with 22 progressive slowing seen as the pacing rate

- increased to 400 beats per minute, which
- 2 mimics the activation times in AF.
- 3 This demonstrates that
- 4 vernakalant's frequency dependent sodium
- 5 channel block demonstrated in vitro readily
- 6 translates to conduction slowing in vivo.
- 7 Vernakalant rapidly and
- 8 effectively converts atrial fibrillation in a
- 9 dog model. Vernakalant's efficacy for
- 10 conversion of atrial fibrillation has been
- 11 confirmed in multiple nonclinical studies, as
- well as clinical studies, which Dr. Kitt will
- show.
- 14 And rapid conversion is one of the
- 15 clinical benefits of vernakalant.
- I would now like to discuss the
- 17 safety implications of vernakalant's
- 18 mechanism of action. Since currently
- 19 available antiarrhythmic drugs such as
- 20 flecainide have been associated with pro-
- 21 arrhythmia under the conditions of ischemia,
- we investigated vernakalant's effects in a

1 highly pro-fibrillatory model in pigs.

In this study, episodes of

ischemia, followed reperfusion, resulted in a

high incidence of ventrical fibrillation and

mortality in the control treated animals.

Flecainide resulted in a lethal VT in all the pigs within five minutes of ischemia. In contrast, vernakalant had a lower incidence of ventricular arrhythmia and mortality in this model.

And this suggests that vernakalant does not have an increased risk of proarrhythmia and mortality in this pig model.

Vernakalant did not show cardiodepressant actions in conscious animals in an
ICH standard cardiovascular safety study.
Since there were, however, adverse events of
hypotension seen in our clinical trials, we
elected to study vernakalant in anaesthetized
dogs where we could increase the dose in
plasma concentrations higher than were
tolerated in conscious dogs.

As shown here, vernakalant did not 1 2. affect systolic nor diastolic blood pressures 3 at therapeutic plasma concentrations. 4 However, as we increased the dose, 5 which resulted in plasma concentrations fivefold higher than the Cmax we saw in 7 patients, there were significant reductions in systolic blood pressure. 8 9 In keeping with vernakalant's 10 atrial targeted actions, vernakalant has 11 minimal effects on the action potential duration in rabbit Purkinje fibers. 12 13 rabbit Purkinje fiber assay is an ICH standard assay used to assess the potential 14 15 risk for torsades de pointes. Drugs which prolong the Purkinje 16 fiber action potential duration have a risk 17 for prolonging QT intervals, and an increased 18 19 risk for torsades de pointes. 20 As shown here, dofetilide 21 produced concentration dependent increases in

the action potential duration, including

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within its therapeutic range, and this is 1 consistent with its selective IKR blockade. 2. 3 Vernakalant produced relatively 4 minor changes in the Purkinje fiber action 5 potential duration, which reached significance at 10 to 30 micromolar. 7 And these more relatively minor effects are consistent with vernakalant's 8 9 concomitant block of late sodium current. 10 And this suggests that vernakalant 11 may have a lower risk of pro-arrhythmia compared to selective IKR blockers. 12 13 As further evidence of a reduced potential for inducing torsades de pointes, 14 15 vernakalant suppressed dofetilide induced early after depolarizations, in an in vitro 16 pro-arrhythmia model. Shown here, dofetilide 17 at a high concentration significantly 18 19 prolonged the action potential duration, and 20 elicited these instabilities of

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repolarization, known as early-after

depolarizations.

1 These early-after depolarizations 2. are believed to trigger torsades de pointes. In contrast, with the addition of 3 4 vernakalant, shown here, the early-after 5 depolarizations were abolished, and the 6 action potentials were normalized. 7 This again suggests that vernakalant may have a lower pro-arrhythmic 8 9 risk than the specific IKR blocker 10 dofetalite. In addition, vernakalant 11 12 suppressed torsades de pointes in an in vivo 13 model of torsades. Shown here in the control conditions, infusions of methoxamine and 14 clofilium produced torsades de pointes in 15 seven of nine animals. 16 With the addition of vernakalant 17 infusion, there was a dose-dependent decrease 18 in the incidence and the duration of torsades 19 20 de pointes. 21 Vernakalant suppressed proarrhythmia in this rabbit model of torsades 22

1 de pointes, and this again suggests that 2. vernakalant may have less pro-arrhythmic risk than drugs with more marked effects on 3 ventricular repolarization. 5 In summary, then, vernakalant is a multi-ion channel blocker, with activity that 7 is potentiated in the atria during AF. Vernakalant rapidly converts atrial 8 9 fibrillation, and appears to have a lower 10 pro-arrhythmic risk in animal models. 11 Vernakalant's safety and efficacy 12 are consistent with its unique ion channel 13 blocking properties. Thank you. And Dr. Keirns will 14 15 now present vernakalant's toxicology and pharmacokinetics. 16 TOXICOLOGY & CLINICAL PHARMACOLOGY 17 18 DR. KEIRNS: Thank you, Dr. Beatch, 19 Dr. Hiatt, and committee members. I'll 20 briefly describe the assessment of toxicology 21 and clinical pharmacology which we've carried out for vernakalant. 22

1 Starting with the toxicology, we 2 conducted a customary program in rodents and non-rodents, and I'll note that there is a 3 note at the bottom of the slide that shows 5 you the corresponding pages in your briefing book. 7 In these studies, the dose limiting toxicities were all transient and 8 9 spontaneously reversible. They were not 10 associated with any gross or microscopic 11 histological findings, and they were consistent with the ion channel blockade that 12 13 Dr. Beatch just described.

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The symptoms that were seen were salivation, tremor, ataxia, and at the very highest dose with repeat dosing, we saw convulsions.

In terms of the therapeutic index relative to the efficacious dose that Dr.

Beatch just described, these findings were seen at a factor of 10 higher exposure.

The pharmacokinetics in metabolism

1 in dogs and humans have been assessed, and 2 showed rapid distribution, and a short elimination half-life. 3 In humans, the metabolism of vernakalant is primarily by 5 cytochrome P450 2D6, and the systemic exposure of parent compound at the maximum 7 concentration compared to the exposure in dogs that I described on the slide before is 8 9 a factor of three. 10 Continuing to describe the 11 pharmacokinetics further, they are dose 12 proportional and linear. There is rapid 13 distribution with an alpha half-life of about 10 minutes, and a high volume of 14 distribution. 15 The terminal elimination half-life 16 17 is fairly short, three hours, but somewhat longer, 5-1/2 hours in 2D6 poor metabolizers. 18 19 Vernakalant is not highly protein bound, and 20 the metabolic pathways have been well characterized. 21 This slide illustrates the 22

pharmacokinetic profile with the phase III 1 2. clinical dosing that Dr. Kitt will describe, and makes a couple of other points. 3 4 Just to orient you, Dr. Kitt will 5 describe two 10-minute infusions, one for the first 10 minutes, and then an observation 7 period for 15 minutes, followed in those patients who do not convert on the first 8 9 infusion, by another 10-minute infusion. 10 And the curves that are displayed 11 here are based on modeling of the phase III clinical data, and we also looked 12 13 specifically at differences between normal extensive metabolizers, and 2D6 poor 14 metabolizers. 15 You can see that, in the early 16 17 times, the concentrations are almost identical, and then they diverge somewhat due 18 19 to the longer half-life in the poor 20 metabolizers. 21 But one of the more important 22 points is that there is a rapid drop in

- 1 concentrations at the end of each infusion,
  2 which is actually driven by distribution, not
  3 by the elimination.
- We assessed a number of

  demographic variables, as well as concomitant

  medications, by using population

  pharmacokinetics, and found that Cmax and

  systemic exposure were not, over the first 90

  minutes, were not significantly influenced by

  age, sex, renal function, or 2D6 expression,

  as I just showed you in the slide before.

In addition, we analyzed coadministration of 2D6 inhibitors and beta
blockers, and did not see any difference in
the Cmax or early exposure of the compound in
the -- with these concomitant medications.

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Finally, as Dr. Kitt will show

you, phase III studies indicated that there

were no safety implications with co
administration of 2D6 inhibitors or

substrates.

I'd now like to turn the

- 1 presentation over to Dr. Kitt to describe
- 2 clinical efficacy and safety.
- 3 CLINICAL EFFICACY AND SAFETY
- DR. KITT: Good morning, committee
- 5 members.
- I am Therese Kitt, and it's my
- 7 pleasure to be able to present to you the
- 8 clinical data from our vernakalant clinical
- 9 trials.
- 10 Efficacy data will be presented
- first, focusing on three studies: the two
- 12 primary registration studies, and a study
- that we did in patients who developed atrial
- 14 fibrillation post cardiac surgery.
- The efficacy presentation will be
- 16 followed then by the safety data
- 17 presentation.
- 18 There were nine clinical trials in
- 19 the vernakalant NDA as outlined on this
- 20 slide. There were two phase I clinical
- 21 studies, and electrophysiology study.
- The CRAFT study was our phase II

dose ranging study.

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The phase III studies were all

3 labeled ACT, which stands for atrial

4 arrhythmia conversion trial, or ACT.

The two registration trials are

ACT I and ACT III. These two studies are

considered the pooled primary population

during my efficacy discussion.

ACT II was a study in patients post-cardiac surgery, and ACT IV was an open labeled safety study. Scene 2 was a study done in patients with typical atrial flutter. In this study, vernakalant was shown not to be effective in converting atrial flutter to sinus rhythm, and the efficacy data will not be further discussed. However, the safety data from these patients are included in our safety analysis.

Eight hundred and twenty three subjects were exposed to vernakalant, and there were 773 patients exposed, and 335 patients received placebo.

1 Once again, as Dr. Keirns had 2. mentioned, I have source documents here, a source page and a table that you can find in 3 4 your briefing document if you want further 5 information on that particular slide. 6 I will be discussing different 7 patient numbers from different patient populations at different data sets. And this 8 9 table lists the different efficacy and safety 10 populations. 11 The primary efficacy studies was ACT I and ACT III, in which 575 patients with 12 atrial fibrillation received study drug, 236 13 patients received placebo, and 339 received 14 vernakalant. 15 Again, the term pooled primary 16 studies refers to the combined patients from 17 ACT I and ACT III with atrial fibrillation. 18 19 ACT III enrolled patients with 20 both atrial fibrillation and with flutter. 21 However, when the results of the Scene 2 22 study were known, the analysis plan was

- changed to exclude patients with atrial
- 2 flutter. This was done before the database
- 3 was locked.
- In the post-cardiac surgery study,
- 5 50 patients with atrial fibrillation received
- 6 placebo, and 100 patients received
- 7 vernakalant.
- 8 The Phase III database contains
- 9 737 patients who received vernakalant, and
- 10 the total number of patients who received
- 11 vernakalant in our phase II and III studies
- was 773 patients.
- I will now discuss the efficacy
- 14 data.
- The phase II dose ranging study
- 16 enrolled patients with a duration of atrial
- 17 fibrillation of three hours to 72 hours.
- 18 This graph shows the cumulative efficacy
- 19 after one and two doses. There was no
- 20 difference between placebo and the low dose
- vernakalant group.
- 22 Vernakalant was effective in the

higher dose group with 53 percent of the

patients converting to sinus rhythm, and the

median time to conversion in the patients who

responded to vernakalant was 14 minutes.

This study established the minimally effective dose to be two milligrams per kilogram. Based on these results, the step dose design for phase three was three milligrams per kilogram, and if no conversion to sinus rhythm was seen, a second dose of two milligrams per kilogram was administered.

The dosing regimen was reversed, giving the three milligrams per kilogram first, assuming more patients would convert, following the higher initial dose.

This is the phase III design for our pivotal studies. The phase III studies were multi-center, randomized, double blind, and placebo controlled, in patients with atrial fibrillation with a duration of greater than three hours, and less than or equal to 45 days.

Patients were stratified based on 1 the duration of their atrial fibrillation. 2. Patients were allowed to have background use 3 of oral rate and rhythm control medications. 5 Patients were randomly assigned to receive up to one of two infusions, the first 6 7 infusion of vernakalant of three milligrams per kilogram given over 10 minutes, followed 8 9 by a 15-minute observation period, and if 10 they had not converted to sinus rhythm, the 11 second dose of two milligrams per kilogram was administered. 12 13 In our studies, placebo was normal saline. 14 Patients underwent continuous 15 halter monitoring, starting at screening, and 16 going up through 24 hours. They also were on 17 18 a telemetry, starting at randomization and up to a minimum of two hours. 19 20 An atrial fibrillation symptom 21 checklist was done at screening, at baseline, 22 at 90 minutes, at 24 hours, seven days, and

also up to 30 days.

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As noted on this slide, electrical

cardioversion and other treatments were

permitted after two hours. The patients were

seen for follow up visit on day seven, and

there was a phone call follow up on day 30.

These are the key inclusion and exclusion criteria. Patients were eligible for the studies if they had symptomatic atrial fibrillation with a duration of greater than three hours and less than 45 days, and they were receiving anticoagulants therapy as per the guidelines.

As I had mentioned previously, patients could be receiving oral antiarrhythmic agents, but they could not receive IV antiarrhythmics if they had been given within the previous 24 hours.

19 Patients needed to be
20 hemodynamically -- patients who were
21 hemodynamically unstable, or who had an MI
22 acute coronary syndrome, or cardiac surgery

within the previous 30 days, were not eligible for this study.

The primary endpoint was the conversion of atrial fibrillation to sinus rhythm within 90 minutes of study drug initiation for a duration of one minute in patients with an atrial fibrillation duration of three hours to less than or equal to seven days.

endpoints supported our primary endpoint, and included the time to conversion to sinus rhythm, conversion of atrial fibrillation to sinus rhythm in patients who had an atrial fibrillation duration of three hours to 45 days, a reduction in atrial fibrillation symptoms, and maintenance of sinus rhythm after conversion.

The phase III baseline characteristics of patients are listed here, and were balanced between the two treatment groups. Patients in our studies had

- 1 histories of congestive heart failure,
- ischemic heart disease, or hypertension,
- 3 which represents the real world population.
- 4 Efficacy is presented here. The
- 5 X-axis is the proportion of patients who
- 6 converted to sinus rhythm, and the Y-axis --
- 7 or the X axis is time. The little orange
- 8 bars are two infusions of vernakalant.
- 9 The gray dashed line is our
- 10 placebo group, and the green line is the
- 11 vernakalant group.
- 12 Efficacy was consistent in both of
- our pivotal trials, with 51 percent of the
- patients with recent onset atrial
- fibrillation converting to sinus rhythm,
- 16 compared with 4 percent in the placebo group.
- 17 In patients who converted to sinus
- 18 rhythm in our responders, the time to
- 19 conversion was rapid. Median time to
- conversion was 11 minutes in the ACT I study,
- and the median time to conversion in
- responders in ACT III was eight minutes.

The analysis I have presented here
is a modified intent to treat analysis, or an
as-treated analysis, which was discussed with
the FDA and agreed to prior to breaking the
study blind.

Patients who were randomized, but

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Patients who were randomized, but did not receive the study drug, were excluded from this analysis.

The intent to treat analysis, imputing patients who spontaneously converted to sinus rhythm as successes, and others were imputed as failures, and in doing this analysis, there was no difference in terms of the modified intent to treat analysis, or the intent to treat analysis.

These are the conversion rates for the three subgroups of patients stratified by the duration of atrial fibrillation, and to the short duration atrial fibrillation group which was our primary endpoint, the overall population, and the long duration group.

As expected, patients with a

shorter duration of atrial fibrillation had a higher rate of conversion.

One of the questions you have been
asked to address is the relationship between
time in atrial fibrillation, and conversion
after vernakalant.

In the ACT I and the ACT IV study, which was the open label study, atrial fibrillation duration was collected in a way that allowed us to look at the relationship between atrial fibrillation duration and conversion.

The following graph shows the observed, which are the bars, and the modeled, which are the lines here with the 95 percent time for these intervals shown by the dashed lines. The probably of conversion by atrial fibrillation duration broken down by days, which is given here on the X-axis.

As you can see by the model, which is a generalized additive model, as atrial fibrillation duration increases, the

probability of conversion decreases similar to other conversion modalities.

There is a greater uncertainty around the conversion rate for patients with longer duration of atrial fibrillation as indicated by the width of the 95 percent confidence intervals in the longer durations.

This is, in part, an artifact of the study design, stratified and randomized by AF duration of our three hour to seven day, and eight to 45 days. One can see that, based on the 95 percent confidence interval, patients with atrial fibrillation duration of less than 48 hours have conversion rates that range from 45 to 70 percent. And those with atrial fibrillation duration of three hours to seven days -- or excuse me, from three to seven days, have conversion rates that range from 15 to 40 percent.

The placebo subtractive efficacy data, based on age, gender, and use of rate or rhythm control medications is presented

here. Placebo is better if to this side of zero, and vernakalant is better if this -- if to this side of zero.

This point up here is our overall treatment effect, and this is the 95 percent confidence intervals.

gender, or use of rate or rhythm control
medications. This slide is similar to the
previous slide. Again, the top category is
the overall treatment effect. There appears
to be a trend towards reduced efficacy in
patients with a history of congestive heart
failure based on a limited database, but no
effect of ischemic heart disease or
hypertension on efficacy.

A pre-specified endpoint in our pivotal studies was relief of atrial fibrillation symptoms, which was collected by a symptom checklist. Vernakalant provided relief of atrial fibrillation symptoms. At minute 90, about 50 percent of our patients

who received vernakalant were asymptomatic,

compared with about 26 percent of the placebo

group.

earlier this morning, the question had come up about what was the percentage of patients who were asymptomatic at hour 24, and there was very little difference between the placebo group and the vernakalant group, with about 70 percent of the patients being asymptomatic at hour 24. And when one looks at the number of patients that were asymptomatic at day seven, once again, there was little difference between placebo and vernakalant, with about 60 percent of the patients being asymptomatic.

Symptom reduction was mediated by the conversion to sinus rhythm as shown on this slide. At minute 90, about 69 percent of the patients who received vernakalant and converted to sinus rhythm were symptom free. Patients who received vernakalant, but

remained in atrial fibrillation, about 29
percent of those patients were symptom free.

A life table estimate was used to determine the maintenance of sinus rhythm following the conversion to sinus rhythm. At 24 hours, 97 percent of the patients who received vernakalant and converted to sinus rhythm remained in sinus rhythm, and patients who received placebo and spontaneously converted, at 24 hours, 83 percent of those placebo patients remained in sinus rhythm.

I have just covered the primary efficacy studies in patients who presented with atrial fibrillation, and will now go over the study in patients who developed atrial fibrillation post-cardiac surgery.

The baseline characteristics of patients in this analysis did not differ, and was balanced between the two treatment groups.

This is the efficacy in the post surgical patients. Again, the Y-axis is the

proportion of patients who had converted to sinus rhythm, and this is the time from first dose to conversion, with our two infusion bars.

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Again, placebo is shown as the gray line, and patients who receive vernakalant is shown as the green line.

The conversion rate and the postcardiac surgery atrial fibrillation study was 47 percent in the vernakalant group, compared with 14 percent in the placebo group. Conversion was rapid, with a median time to

conversion of 12 minutes in the responders.

Efficacy was robust and consistent across all of our studies. Included in this slide is the ACT IV study, which I had mentioned was an open label safety study. However, we did collect efficacy in that study, and in the ACT IV study in patients who had atrial fibrillation of three hours to

seven days in duration, 51 percent of those

patients converted to sinus rhythm.

So once again, efficacy was 1 2. consistent across all of our studies, ranging 3 from 47 percent in the post-surgical population, to 53 percent in our phase II 4 5 study. To summarize efficacy, vernakalant 7 was effective in converting atrial fibrillation to sinus rhythm in patients who 8 9 spontaneously developed atrial fibrillation, 10 and in those post-cardiac surgery patients. 11 In the patients who converted, the median time to conversion was 10 minutes. 12 13 Efficacy was not affected by age, gender, rate, or rhythm control medications, or 14 concomitant illnesses such as congestive 15 heart failure or ischemic heart disease. 16 There was relief of atrial 17 fibrillation symptoms, and sinus rhythm was 18 maintained out to 24 hours. 19 The next series of slides will 20 21 cover safety. I will first discuss adverse 22 events, serious adverse events, including

- deaths. Events of interest will then be presented.
- These events were identified

  during the review of the safety data, and

  based on other antiarrhythmic agents.

Events of interest include

ventricular arrhythmias, including effects on

the QT and torsades de pointes, bradycardia,

and hypotension.

Safety data collection was

11 comprehensive in our clinical studies, and
12 included adverse events, 12 with ECG and
13 vital signs which were collected every five
14 minutes from the start of the infusion up
15 through minute 50, and then as outlined here.

In addition, a 24 hour Holter was recorded.

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As you can see, the monitoring in the first 24 hours was extensive and capable of capturing asymptomatic and infrequent events.

The safety database contains all

patients, and there were 773 patients who received vernakalant, compared with 335 in the placebo group.

Patients had concomitant

illnesses, such as congestive heart failure,

ischemic heart disease, and hypotension,

which are typically seen in patients seeking

treatment for atrial fibrillation.

The use of rate and rhythm control medications during the seven days prior to study drug administration did not differ between placebo or the vernakalant groups.

Adverse events which occurred within the first 24 hours are of particular interest because of the short half-life of vernakalant. This table summarizes the adverse events occurring in more than 5 percent, and at a higher rate than in the placebo group.

Table 16 in your briefing document contains a more complete list of the adverse events. The most common adverse events seen

- in the vernakalant group were dysgeusia,
- which was typically described as a metallic
- 3 taste, sneezing, parathesias, nausea, and
- 4 hypotension.

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- 5 The median time to onset in

patients receiving vernakalant was seven to

35 minutes, and the median duration in the

- 8 patients who received vernakalant was eight
- 9 to 20 minutes.
- 10 Hypotension is the most clinically
- important adverse event that is on this list,
- and will be discussed in detail later.
- The incidence of any serious
- 14 adverse event occurring within the first 24
- 15 hours was similar for placebo and
- 16 vernakalant, with 3.9 percent of the patients
- who received placebo reporting any serious
- adverse event, compared with 4.1 percent of
- 19 the vernakalant group.
- 20 Serious adverse events of complete
- 21 heart block, sinus arrest, sinus bradycardia
- or bradycardia, ventricular fibrillation and

hypotension were the most common serious adverse events occurring in the vernakalant group in the first 24 hours.

The incidence of stroke is not shown on this slide, since the incidence was low in our clinical studies. But to help you to address question number nine, which the agency has asked you to address, the incidence of stroke within the 30 days following study drug administration in the placebo group was 1.2 percent, and in the vernakalant group, the incidence of stroke was 0.4 percent.

There were five deaths in the vernakalant studies. All deaths occurred in patients receiving vernakalant. There was one death within the first 24 hours that was considered by the investigator to be related to vernakalant, and that is this top patient here.

The other four deaths were not considered by the investigator to be related

- to vernakalant, and one occurred on day two,
  and the others occurred more than seven days
  after receiving vernakalant.
- I will now discuss the one related death.

The patient was a 64-year-old man

with critical aortic stenosis, an injection

fraction of 40 percent, and New York Heart

Association Class II congestive heart

failure.

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Serious protocol violations

occurred in this patient, including dosing a

patient who was hemodynamically unstable

during an acute myocardial infarction. He

became hypotensive following the

administration of metoprolol, and was give in

saline to restore his blood pressure.

The patient received two doses of vernakalant, and became hypotensive after both doses. Following the second infusion, he developed ventricular fibrillation, and resuscitation attempts were not successful.

1 Autopsy showed him to have aortic 2. stenosis and myocardial hypertrophy. There were four unrelated deaths. 3 All these deaths occurred more than 24 hours 5 after receiving vernakalant. A 68-year-old woman died during a gastroscopy procedure. 7 At autopsy, she was found to have a ruptured dissecting aortic aneurysm. 8 9 A 67-year-old man with lung 10 cancer, pneumonia, suffered a respiratory 11 arrest, and was placed on life support. 12 died following the family's decision to 13 remove life support eight days after receiving vernakalant. 14 A 70-year-old woman with breast 15 cancer died from a gastrointestinal 16 hemorrhage 24 days after receiving 17 vernakalant, and a 90-year-old woman died of 18 19 congestive heart failure 26 days after 20 receiving vernakalant. None of these deaths were 21 22 considered by the investigator to be related

to the administration of vernakalant. None had a common pharmacological cause which may have contributed to their deaths.

Events of interest will now be presented. Based on a safety profile of other antiarrhythmic agents, and in reviewing the safety data for vernakalant, three events of interest were identified: ventricular arrhythmia, bradycardia, and hypotension.

Incidence tables were created using the phase III studies for these three events using multiple data sources, such as adverse events, 12 Lead ECGs, the 24 hour Holter recordings, and vital signs.

There were no pre-specified definitions for adverse events such as bradycardia or hypotension, and so these events were judged and classified by the investigator.

A conservative definition of ventricular tachycardia was used, and was defined as at least three consecutive beats,

at a rate of 100 beats or more per minute.

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Analyses were conducted for all post dose, and for the two to 24 hour time period. The zero to 24 hour time period is the most informative, because it was the time of intensive data collection, and because most of vernakalant is cleared from the blood within this period.

The zero to 24 hour time period was divided into the zero to two, and two to 24 hour periods, since after two hours, other treatments for atrial fibrillation were allowed.

This table summarizes the ventricular events during the zero to two and two to 24 hour period. The incidence of ventricular tachycardia was approximately three percent in both the placebo and the vernakalant group.

In the two to 24 hour time period, the incidence of ventricular tachycardia was 8-1/2 to 12 percent, and essentially no

difference between placebo or the vernakalant group.

There was one case of torsades de pointes, which occurred in the two to 24 hour time period, which is shown here.

There are two cases of ventricular fibrillation during the zero to two hour time period. One does not show up on this table, since this table summarizes the phase III data, and the one case occurred in the phase III study.

The case that is shown here on this slide is a case that resulted in the fatal outcome which I had just discussed.

The second case of ventricular fibrillation will now be discussed.

A 24-year-old female with atrial fibrillation presented to the emergency room with a rapid ventricular response. About two hours following the initiation of vernakalant infusion, electrical cardioversion was attempted.

A non-synchronized cardioversion 1 2. shock was delivered, with ensuring ventricular fibrillation. Immediate 3 defibrillation was successful. 5 discharged the next day. The investigator determined that 7 the ventricular fibrillation was due to the delivery of a non-synchronized electrical 8 9 shock, and not drug related. 10 This is a case of non-synchronized electrical cardioversion due to a technical 11 malfunction, which is known to occur. 12 13 There are a total of four reports of torsades de pointes in the 30-day follow 14 15 up period: one in a patient receiving placebo, and three in patients receiving 16 vernakalant. Of the three patients receiving 17 vernakalant, one occurred, which is the top 18 19 case here, within the first 24 hours, and the 20 other two occurred more than 24 hours after 21 receiving vernakalant. 22 This is the ECG tracing of the

torsades which occurred within the first 24 1 2. hours after receiving vernakalant. A 51year-old man with atrial flutter did not 3 convert after receiving vernakalant. 5 Ibutilide was given two hours and 20 minutes after the initiation of the vernakalant 7 infusion. He developed an asymptomatic, nine-beat run of torsades, immediately 8 9 following the infusion of ibutilide. 10 The torsades is captured on the 11 Holter recording. An association with vernakalant 12 13 cannot be excluded in this case, since it occurred two hours and 20 minutes after the 14 initiation of the infusion of the 15 vernakalant. 16 The incidence of torsades de 17 pointes in our safety database, then, is one 18 19 out of 773 patients, or 0.13 percent. 20 Here are the other cases of the 21 torsades. A 90-year-old woman developed torsades 32 hours after receiving 22

1 vernakalant.

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The third case was a 69-year-old
man who developed torsades de pointes on day
17 and 18 after receiving vernakalant, and
three days after aortic and tricuspid valve
surgery.

The fourth case was a 53-year-old
man who did not convert after receiving
placebo. He developed torsades de pointes
after receiving increasing doses of sotalol,
and about an hour after electrical
cardioversion.

None of these cases were considered related to study drug by the investigator.

The QT interval data that I am showing you on this slide includes patients who are in sinus rhythm, as well as those who have remained in atrial fibrillation.

QTCF is shown here on the Y-axis, and time is shown on the X-axis. Once again, our orange bars are two infusions, and this

- gray bar shows when other therapies are permitted.
- 3 QTCF was selected over QTCB, since
- 4 QTcF is not greatly affected by heart rate.
- 5 Baseline QTCF was similar for placebo and
- 6 vernakalant, and as you can see, the QTC
- 7 interval increases with each of the
- 8 infusions, and it starts returning to
- 9 baseline once the infusion is discontinued.
- 10 From 90 minutes out to follow up,
- there is very little change in the QTCF
- 12 interval.
- 13 Shifts from baseline in the QTCF
- 14 were evaluated for patients in the phase III
- 15 studies. This slide summarizes the QTCF of
- greater than 500 milliseconds, and greater
- 17 than 550 milliseconds.
- 18 The cumulative incidence of any
- 19 patient with a QTCF of greater than 550
- 20 milliseconds during the zero to two hour
- 21 post-dose period was 0.6 percent for
- vernakalant, and 0.4 percent for placebo.

After minute 30, there was no 1 2 difference between placebo and the 3 vernakalant group. The incidence of any patient with a QTCF of greater than 500 5 milliseconds during the zero to two hour time period was 7.2 percent for vernakalant, and 7 2.8 percent for placebo. There was no difference between placebo and vernakalant 8 9 after 90 minutes. 10 This graph shows the QTCF change 11 from baseline for the 2D6 poor and extensive 12 metabolizers. This shows change from baseline 13 for the QTCF. This shows time. The extensive metabolizers are 14 15 shown by the yellow line here, the little squares, and poor metabolizers are shown by 16 the green line with the triangles. 17 Although the number of poor 18 19 metabolizers is small, there appears to be no 20 difference between the poor and extensive 21 metabolizers in change from baseline in QTCF. The incidence of bradycardia was 22

- summarized using adverse events, 12 Lead ECG data, and Holter data.
- In the zero to two hour time

  period, the Holter data showed no difference

  between placebo or the vernakalant group.

Looking at adverse events in the 7 12 Lead ECG, there appears to be a higher incidence of bradycardia during the zero to 8 9 two hour time period. The reverse is seen in 10 the two to 24 hour time period when other 11 therapies are allowed. You can see there is 12 a higher incidence of bradycardia in the 13 placebo group when compared to the vernakalant group. 14

The higher incidence of bradycardia is due to patients converting to sinus rhythm following the administration of vernakalant.

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This slide shows the heart rate by responder status. This is the heart rate on the Y-axis, and time again is shown here on the X-axis.

1 Patients who received vernakalant 2. and converted to sinus rhythm are shown by the solid green line. Patients who received 3 vernakalant but remained in atrial 5 fibrillation are shown by the dashed green 6 line, and placebo is shown by the gray line. 7 Patients who converted to sinus 8 rhythm with vernakalant had a slowing of 9 their heart rates. And when other therapies 10 are allowed, as shown out here, you can see 11 their heart rates start to become similar. 12 Of particular interest are the 13 patients who had a serious adverse event, or bradycardia during the first 24 hours post 14 15 infusion, or had study drug discontinued due to bradycardia. Details of these cases can 16 be found in table 21 in your briefing 17 document. 18 19 There were 15 patients who met 20 this criteria: 13 in the vernakalant group, 21 for an incidence of 1.7 percent, and two 22 patients in the placebo group for an

1 incidence of 0.6 percent.

four days.

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The onset of bradycardia occurred
either during one of the two infusions, or
within 10 minutes of the end of the infusion.
The duration was from less than a minute to

The bradycardia responded to

discontinuation of the infusion, or atropine,

and in one patient who was post-operative and

still had their epicardial wires in place,

the bradycardia was treated by pacing.

There were two patients in the placebo group who had an event of bradycardia. One occurred after electrical cardioversion, and the second occurred 20 hours after received placebo.

The incidence of hypotension was summarized using adverse events and blood pressure. This slide presents the adverse event and systolic blood pressure less than 90 millimeters of mercury data.

Further details are found in Table

1 22 in your briefing document.

The incidence of hypotension

reported as an adverse event, or systolic

blood pressure less than 90 millimeters of

mercury, was higher in the vernakalant group

compared to the placebo group in the zero to

two hour time period.

And once again as we saw for bradycardia, the reverse is seen in the two to 24 hour period.

of particular interest again are patients who had a serious adverse event of hypotension during the first 24 hours, or who had study drug discontinued due to hypotension, and there were 12 patients who met these criteria. There were two in the placebo group for an incidence of 0.6 percent, and 10, or 1.3 percent, in the vernakalant group.

Table 23 in your briefing document provides detailed information on these patients.

1 The onset of hypotension occurred 2 either during the two infusions, or within 15 minutes of the end of the infusion. 3 4 In one patient, the onset occurred 5 about seven hours after vernakalant, and was associated with the diagnosis of 7 cholecystitis, and following the administration of verapamil. The duration of 8 9 the hypotension was from two minutes to two 10 hours and 16 minutes. 11 The hypotension responded to 12 placing the patient in a Trendelenburg 13 position, stopping the infusion, and giving saline if necessary. 14 15 One patient was treated with norepinephrine, and one patient was treated 16 17 with phenylephrine. 18 There were two placebo patients 19 who developed hypotension. One event 20 occurred after electrical cardioversion, and 21 one event occurred five hours after receiving 22 placebo.

1 There are a total of 164 patients 2. in our phase III safety database with a history of congestive heart failure. 110 3 4 patients received placebo, and 54 received --5 excuse me, 110 patients received vernakalant, 6 and 54 received placebo. 7 During the zero to 24 hour time 8 period, a trend towards an increased 9 incidence of hypotension was observed in 10 patients receiving vernakalant. There was no 11 difference in the incidence of bradycardia or 12 ventricular arrhythmia. 13 The safety database in patients with a history of congestive heart failure is 14 limited. Vernakalant should be administered 15 with caution in patients who have a history 16 of congestive heart failure, and further 17

Electrical cardioversion was allowed two hours after receiving study drug.

There was no difference in the vernakalant group compared with placebo in the percentage

studies are needed.

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of successful cardioversions, the median 1 2 number of shocks, or the median joules. 3 To summarize the safety of vernakalant, there was one vernakalant-5 related death in a patient with critical aortic stenosis, and an acute MI who 7 developed hypotension and ventricular fibrillation following the administration of 8 9 metoprolol and vernakalant. 10 Transient increases were seen in the QRS and QT intervals. 11 The incidence of torsades was 0.13 12 13 percent in the first 24 hours after administration of vernakalant, and occurred 14 immediately following an infusion of 15 ibutilide. 16 17 Clinically important bradycardia, defined as a serious adverse event within the 18 first 24 hours, or patients who required 19 20 discontinuation of study drug due to 21 bradycardia, occurred in 1.7 percent of the 22 vernakalant group, and 0.6 percent of the

- placebo group, and was associated with conversion to sinus rhythm.
- 3 Clinically important hypotension,
- 4 again defined as a serious adverse event
- 5 within the first 24 hours, or hypotension
- 6 requiring discontinuation of study drug,
- 7 occurred in 1.3 percent of the vernakalant
- group compared with 0.6 percent of the
- 9 placebo group.
- The hypotension was
- 11 periinfusional, transient, and responded to
- 12 saline. Two patients were treated with
- pressors.
- 14 I would like to conclude my
- presentation with a discussion of risk
- 16 management and post-marketing studies,
- assuming that we would get approval, of
- 18 course.
- We see four components to risk
- 20 management. The prescribing information,
- 21 health care provider education, pharmaco-
- vigilance, and post-marketing studies.

1 The FDA approved label will be the 2. primary tool in risk management. The package insert will identify the patient population 3 for which vernakalant should be used. 5 includes patients with symptomatic, recent onset atrial fibrillation, and who are 7 hemodynamically stable. Patients with an acute MI, acute 9 coronary syndrome, symptomatic, or 10 decompensated congestive heart failure should 11 not receive vernakalant. And vernakalant 12 should be used with caution in patients who

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Vernakalant should be administered in a monitored setting with a physician in attendance during the infusion. Vital sign measurements, and continuous cardiac rhythm monitoring should be conducted for a minimum of 90 minutes after the end of the infusion, or until the ECG parameters have stabilized, and the patient is clinically stable.

have a history of congestive heart failure.

If hypotension, bradycardia, or

clinically significant changes are seen in 1 2. the ECG, vernakalant infusion should be immediately discontinued, the second dose 3 should not be given, and the patient should 5 be treated symptomatically. The education program will be 7 comprehensive and focused on a select target The prescribing information will 8 audience. 9 be the basis for our educational activities. 10 Routine pharmaco-vigilance 11 practices will be employed, including adverse 12 event reporting, with emphasis on ventricular 13 arrhythmia and deaths, reviewing the literature for adverse event reports, data 14 15 mining, and the use of signal detection programming. 16

Additional studies are ongoing or planned. These include a study on ventricular defibrillation threshold, and the effect of vernakalant on key glycoprotein transporters.

22 PK studies in hepatically or

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- 1 renally impaired patients are ongoing.
- 2 A safety and efficacy study will
- 3 be initiated in the near future in Europe.
- 4 We are also planning a post
- 5 marketing observational study, which is
- 6 discussed on the next slide.
- 7 Safety has been well characterized
- 8 in the development program, and we recognize
- 9 if vernakalant is approved, the incidence of
- 10 low frequency adverse events should be
- addressed in the real world setting.
- 12 Therefore, we propose a post
- 13 marketing study to assess adverse events,
- focusing on torsades de pointes, ventricular
- 15 arrhythmias, bradycardia, hypotension, and
- deaths.
- 17 Design options for this study may
- include a registry and/or mining of managed
- 19 health care databases.
- 20 The details of these studies will
- 21 be worked out with the FDA, and experts in
- the field.

1	Based on the observed event rates,
2	we believe a sample size of approximately
3	2,000 patients will provide additional
4	information on the safety profile of
5	vernakalant in the treatment of atrial
6	fibrillation.
7	I thank you for your attention,
8	and I now turn the podium over to Dr. Jeremy
9	Ruskin, who will now discuss the risks and
10	benefits of vernakalant.
11	RISK/BENEFIT SUMMARY
12	DR. RUSKIN: Thank you, Dr. Kitt.
13	Dr. Hiatt, committee members, FDA
14	members, guests, I appreciate the opportunity
15	to offer some comments on the benefits and
16	risks of vernakalant injection.
17	Just to get at a point that Dr.
18	Harrington raised earlier, this is an attempt
19	to map the patients in the vernakalant trials
20	in relation to the AFFIRM study, which has
21	been discussed this morning, and also a large
22	European survey of patients with atrial

fibrillation. And there are some demographics and relevant medical history presented here for each of the populations.

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You can see that there is an age difference, not a huge one, but an age difference between AFFIRM and the vernakalant studies, based on the fact that, as we heard this morning, the AFFIRM trial entered patients age 65 or older, largely directed at an older population, with a small subset who had major risk factors that allowed them to enter at a younger age.

13 The other difference is that there
14 is less congestive heart failure in the
15 vernakalant studies than AFFIRM. But in
16 terms of valvular disease, coronary heart
17 disease and hypertension, the trials or the
18 populations are essentially
19 indistinguishable.

20 And I think that this indicates
21 that the trials were done in a clinically
22 relevant population, not solely restricted to

1 young patients without structural heart
2 disease.

3 The major risks of vernakalant are

4 listed here, and you have heard about these

in detail from Dr. Kitt, and they include

torsades, hypotension and bradycardia, and

7 what are listed here are hypotension and

8 bradycardia that were reported either as

9 SAEs, or required drug discontinuation.

The point estimates are listed

here, and in order to model a worst case

scenario, the upper bound of the 95 percent

scenario, the upper bound of the 95 percent

confidence limits are listed here. And you

can see that, for torsades, the point

estimate is 0.13 percent, the upper 95

percent confidence bound is 0.6 percent.

17 For serious hypotension, the point

estimate is 1.3 percent, with an upper 95

19 percent confidence bound of 2.2 percent, and

for bradycardia, the point estimate is 1.7,

with an upper confidence bound of 2.7

22 percent.

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1 The QT prolongation, as you've 2. heard from Dr. Kitt, is moderate, and There was one case of torsades de 3 transient. pointes which occurred during the first 24 5 hours after administration of vernakalant, and immediately following an infusion of 7 ibutilide, and I'll offer an additional comment on that towards the end. 8 9 The hypotension associated with 10 the drug is peri-infusional and generally 11 transient, and in almost all cases responded to conservative measures. 12 13 The bradycardia, as you also heard, is largely associated with conversion 14 15 of atrial fibrillation to sinus rhythm. A couple of words about congestive 16 heart failure, another area of concern for 17 two reasons. One, the experience is 18 19 relatively limited, and two, there appears to be somewhat lower efficacy, and perhaps more 20 21 in the way of hypotension. And what's listed here are 22

1 efficacy and hypotension AEs as a function of 2. placebo patients with a history of failure, vernakalant patients with a history of 3 congestive failure, and vernakalant patients 5 with no history of heart failure. And you can see the lower efficacy 7 rate, small numbers, but at least a suggestion of a lower efficacy rate, and 8 9 likely more hypotension in vernakalant 10 treated patients with a history of heart

failure compared to those without.

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The next two slides summarize the benefits of vernakalant injection, and as you also heard from Dr. Kitt, the drug effectively converts atrial fibrillation to sinus rhythm in about 50 percent of patients.

This effect is highly consistent across studies. The onset of action of the drug is rapid, with a median time to conversion of approximately 10 minutes, and conversion from atrial fib to sinus rhythm by treatment strategy, that is, vernakalant

- versus placebo, results in a highly significant reduction in symptoms.
- This symptom reduction is mediated
  by conversion of atrial fibrillation to sinus
  rhythm.

In addition, the effect of the 7 drug is durable, with 97 percent of converters remaining in sinus rhythm at 24 8 9 hours. Vernakalant can be administered with 10 background rate or rhythm control 11 medications, which were present in 72 percent 12 and 20 percent of patients, respectively. 13 Electrical cardioversion remains

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an option, because it is as effective in vernakalant non-responders as it is in placebo patients. And the drug is safe and effective in patients with common comorbidities, including hypertension, which was present in 52 percent of patients, and ischemic heart disease, which was present in 24 percent of patients.

This slide provides a profile of

all serious ventricular arrhythmias observed during treatment with vernakalant during the first 24 hours.

You have heard that there were two cases of ventricular fibrillation, one clearly associated with drug administration involving a major protocol violation in a patient with critical aortic stenosis, and likely global ischemia.

The second case involved the induction of ventricular fibrillation by a non-synchronized DC shock in a young female patient who had received vernakalant a few hours prior.

In that patient, the ECG intervals showed no evidence of QT or QRS widening prior to the event, and a 12 Lead ECG immediately after conversion showed normal QRS and QT intervals, again suggesting that this was not a pharmacologic pro-arrhythmic event.

The one case of torsades de

1 pointes which was reported was an 2. asymptomatic, 9-beat run of polymorphic ventricular tachycardia that occurred 3 4 immediately after administration of ibutilide 5 in a patient who had received two doses of vernakalant about two hours earlier. 7 While the temporal association with ibutilide is compelling in this case, a 8 9 possible contribution of vernakalant to the 10 occurrence of torsades cannot be excluded. 11 All the remaining arrhythmias were 12 non-sustained ventricular tachycardias, both

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All the remaining arrhythmias were non-sustained ventricular tachycardias, both monomorphic and polymorphic, and as you can see, these occurred with a frequency that was slightly lower, but statistically indistinguishable on vernakalant compared to placebo.

In summary, vernakalant is

effective for the rapid conversion of atrial

fibrillation to sinus rhythm, with an

accompanying reduction in atrial fibrillation

associated symptoms.

1	Clearly, more experience is needed
2	in congestive heart failure, and the drug is
3	associated with risks, predominantly
4	hypotension, bradycardia, and a very low pro-
5	arrhythmic risk.
6	For me as a clinician, these risks
7	are favorably balanced by the benefits of the
8	drug, and are manageable.
9	And for that reason, I believe
10	that vernakalant injection provides an
11	important treatment alternative for patients
12	with acute symptomatic atrial fibrillation.
13	Thank you.
14	CHAIR HIATT: Thank you all very
15	much.
16	I think given the time of the
17	morning we should take a break, and then
18	reconvene and pose our questions to the
19	sponsor and their presentations.
20	So maybe 15 minutes.
21	(Whereupon at 10:57 a.m.
22	the proceeding in the

1 above-entitled matter went off the record to 2. return on the record at 3 4 11:20 a.m.) 5 QUESTIONS/DISCUSSION FROM THE COMMITTEE 6 CHAIR HIATT: We're slightly off 7 schedule, but I think we can make that up fairly easily. No one is scheduled for the 8 9 public commentary part of this. 10 So I think the morning session has 11 been quite helpful. And we did really begin with a general discussion as well. So now is 12 13 the time for the Committee specifically to address any questions to the sponsor or 14 15 perhaps Dr. Granger about any of the things we have seen so far this morning. 16 17 As everyone is getting set up, I would like to lead off with a couple of 18 19 I have some specific questions. things. The 20 one that kind struck me initially was that I 21 think 20 percent of the patients that came 22 into these trials were asymptomatic. And, as

we heard today, one of the sort of compelling reasons to convert people is because they have sort of drive you in that direction. So I would like to know why that occurred.

I think the thing that I have a bigger issue with is sort of the absence of data that I think the sponsor must have, some of which we heard about just a minute ago about the symptomatic status of patients at 24 hours.

I have in my mind a table that has these three windows: zero to 2, 2 to 24, and 24 hours to 7 days. And then I have a list of variables split by drug and placebo. You know, those converted to atrial fibrillation, Cardioversion, those who took other antiarrhythmic drugs, symptom score, adverse events, deaths, and other kinds of serious safety concerns.

And I realized that things changed after two hours, that patients were then allowed to take sort of standard therapies,

which included both perhaps chemical and, as
we saw in the briefing document, electrical
Cardioversion, which occurred in 37 percent
of patients randomized to drug and 58 percent
of patients randomized to placebo. So
clearly more patients on placebo had to
undergo electrical Cardioversion.

But in terms of getting at the overall risk-benefit of this development program, I think at least understanding those endpoints at 24 hours is extremely important and not just narrowing our window to the two-hour time frame.

We heard a little bit, again, that symptomatic differences were not seen at 24 hours or later. And if you look at the heart rate status by responders' group, slide 74, clearly when you evoke other therapies, there really doesn't appear to be any difference between drug responders and drug nonresponders, or placebo, at least in terms of heart rate. And if heart rate is a

- reflection of symptoms, there was no difference in symptoms either.
- So is there some way we could fill

  out a table that kind of completed that

  missing data? We have complete data to two

  hours. I think a lot of things were not

  presented at 24 hours. We have adverse

  events that we don't have the symptoms for.

9 And so I guess I would like to see that.

10 DR. MASSIE: Can I just add one 11 request, which I think is embedded in yours, which is of those that didn't get 12 13 electrically converted, what the spontaneous conversion rate is at that 24-hour time since 14 15 we have the Holters? Because I have to plead In some of my earlier comments, I 16 stupidity. really read this booklet as you had to be 72 17 18 hours, 3 days, out, not 3 hours.

And so we're clearly right in the middle of the window when we would expect perhaps 25 to 30 percent of these people to convert spontaneously over that period of

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- time that I misrepresented.
- 2 CHAIR HIATT: Yes.
- 3 DR. MASSIE: At least for 24
- 4 hours, we should get that.
- 5 CHAIR HIATT: So before we go much
- 6 further into perhaps dozens of specific
- 7 questions that we would like to have
- 8 addressed, I don't wonder if the sponsor will
- 9 be prepared to provide us with that
- 10 additional information, those missing data
- 11 cells, particularly at 24 hours, you know,
- the numbers of patients converted at 24
- hours; the number of patients undergoing
- 14 electrical Cardioversion, which we did get in
- the briefing document; use of other
- 16 antiarrhythmic drugs; the actual symptom
- 17 scores at 24 hours.
- 18 We have adverse events I think
- 19 pretty well described out that far. And then
- 20 maybe we'll take some time to do that. And
- 21 perhaps we could circle back to that
- 22 question, even later, early in the afternoon,

T TICCCDDULLY	1	if	necessary.	
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2	MEMBER HARRINGTON: Could I just
3	get a little more information? If that table
4	is going to be constructed, Bill, I would
5	like a safety composite. We are seeing
6	things, you know, low-frequency events. But
7	I would like to know what happens when you
8	add everything up and in the same issue at 24
9	hours for both arms.
10	CHAIR HIATT: I see Dr. Kitt
11	standing at the microphone.
12	DR. KITT: Okay. There are quite
13	a few questions in there. And I will try to
14	go through them as best as I can remember
15	them. And please if I forget something, let
16	me know.

interrupt you, but verbally would be nice.

But I might forget some of the numbers. If

it's possible to prepare a slide that has the

primary data out to two hours, which we have

all seen and read before the meeting, you all

CHAIR HIATT: And sorry to

nicely presented, but then carrying those 1 2 things forward to 24 hours on the safety side is mostly done, but on the efficacy side and 3 4 perhaps the add out the bad stuff and if it's 5 possible out to seven days. We might 6 visually look at that because I think it 7 gives us a more complete picture of risk and benefit. 8 Okay. I think one of 9 DR. KITT: 10 your questions you had asked was why were 11 people at baseline asymptomatic. And I think 12 that refers to figure 5 in your briefing 13 document. Between screening and baseline, 14 15 other therapies were allowed. So somebody 16

other therapies were allowed. So somebody
had come in with a very rapid heart rate.

They could have received a dose of
Metoprolol. And so some of those patients
had a reduction in their symptoms. So that's
why at baseline some of our patients were
asymptomatic because we did allow the
treatment before baseline.

1 Slide up. I think this slide may 2. address some of your other questions. 3 is our three hours to seven-day group, patients who had converted to sinus rhythm 4 5 and those who had remained in atrial fibrillation. So here at baseline are 7 percentage of patients without symptoms. And then the data had shown at 90 minutes. 8 9 And here at 24 hours, I think 10 patients became asymptomatic due to the 11 conversion to sinus rhythm. Those who remained in atrial fibrillation less than 40 12 13 percent were asymptomatic, whether that be at 24 hours or 7 days. 14 Thanks. 15 CHAIR HIATT: Just before you walk off with that one, then, so that you 16 17 clearly have a symptomatic advantage out to 2 hours, but then as other therapies are 18 19 employed, you lose that advantage at 24 hours 20 and 7 days. Is that correct, then? 21 That's right. DR. KITT: The 22 patients that we studied in our studies, the

patients we studied, were those I think where

clearly the physician felt that they needed

to be converted to sinus rhythm. And if they

did not convert with vernakalant, they went

out to have other therapies.

CHAIR HIATT: So all of this

discussion will acknowledge clearly that

other therapies were employed after two

hours. And clearly there is a relationship

between going back into sinus rhythm and

relief of atrial fibrillation symptoms. So

we understand that. But I guess it is just

good to see the data.

DR. KITT: Slide up. 14 Okay. Maybe 15 this will help. So the majority of the patients that remained in atrial fibrillation 16 after study treatment received either 17 electrical Cardioversion or other 18 19 antiarrhythmic agents within the first 24 So the top line here is other 20 spontaneous converters from placebo and the 21 vernakalant converters. And here are the 22

- 1 non-converters.
- 2 And you can see that the
- 3 non-converters, about 80 percent of those, in
- 4 our study went on to get treated with either
- 5 electrical Cardioversion and/or
- 6 antiarrhythmic agents. And a majority of
- 7 those patients actually had electrical
- 8 Cardioversion. I don't think there were very
- 9 many that received antiarrhythmics.
- DR. MASSIE: Do you know anything
- about the spontaneous conversion in the
- people who were not treated, the 20 percent?
- DR. KITT: Just a minute.
- 14 (Pause.)
- DR. KITT: No. I'm afraid we
- don't have that analysis.
- DR. CANNON: I believe you or
- someone presented that there was a follow-up
- 19 contact at 7 days and at 30 days. Maybe it's
- 20 7 days EKG or Holter and 30 days telephone
- 21 contact.
- 22 My specific question is about the

1 durability. So I know that at 90 minutes, 2 the people who converted at 24 hours, the 3 majority, 90-something percent, were still in sinus rhythm. So my question is, what about 5 at 7 days and at 30 days? 6 What percent of people who are 7 successfully cardioverted with the drug vernakalant and who were in sinus rhythm at 8 9 24 hours remained in sinus rhythm at 7 days 10 and 30 days? Do you have those data? 11 DR. KITT: Just a minute, please. 12 (Pause.) 13 DR. CANNON: So this follows on figure 53, where you show the data, the 14 15 durability, at 90 minutes. So I am asking for an extension of durability. 16 17 DR. KITT: Right. We did do 18 12-Lead ECG on day seven. 19 DR. CANNON: Okay. 20 DR. KITT: The day 30 was just a 21 telephone telephone call. I don't recall 22 offhand what the percentage --

1	CHAIR HIATT: So what about day
2	seven?
3	DR. KITT: We're trying to get
4	that data for you. What is it? Ninety-three
5	to 94 percent remained in sinus rhythm at day
6	seven.
7	CHAIR HIATT: And tell us about
8	both groups. I'm sorry. So at day seven,
9	what percent of both groups were in sinus?
10	DR. KITT: Placebo and
11	vernakalant?
12	DR. CANNON: And while you're
13	looking that up, what about the symptoms at
14	day seven for both groups as well because it
15	was indicated you did the symptom checklist
16	at both time points.
17	DR. KITT: Okay. Slide up,
18	please. This shows if they were in sinus
19	rhythm. This shows how many were
20	symptom-free at day seven. So if they were
21	in sinus rhythm and they received placebo, 67
22	percent were symptom-free, 65 percent in the

- vernakalant group if they were in sinus rhythm on day 7.
- DR. CANNON: But, of course, the
- 4 placebo patients by then, many would have
- 5 received something. They would have been
- 6 electrically cardioverted or --
- 7 DR. KITT: Right. Those are
- 8 people --
- 9 DR. CANNON: -- ibutilide or
- 10 whatever. So that's a tough comparison, I
- 11 think.
- 12 MEMBER HARRINGTON: Well, I think
- what you're saying, Richard, is you're
- embarking upon a strategy here. So the
- 15 strategy is pharmacologic Cardioversion from
- 16 the outset in the half of the people that it
- 17 fails in. They also undergo electrical
- 18 Cardioversion or a period of two hours of
- 19 observation followed by electrical
- 20 Cardioversion.
- 21 So I think from the clinician's
- 22 perspective at seven days, what you are

1 seeing is the strategy comparison. 2 the strategy, there is no difference. 3 DR. CANNON: So along that 4 thinking, though, we need to know what the 5 placebo patients actually got, how many 6 converted spontaneously, how many got 7 electrical -- well, she actually presented those data -- how many got ibutilide or 8 9 something else. I mean, additively, it may 10 be that similar numbers of people got similar 11 kinds of similar treatments of one sort or 12 another. 13 CHAIR HIATT: Well, remember at 24 hours, 58 percent of placebo patients had to 14 15 be cardioverted versus 37 percent. Because I think Dr. Harrington actually said what I 16 think is running through my mind, it's a 17 treatment strategy for comparing drug to 18 placebo, but that's over a very short 19 20 interval. 21 And so the issue is, what does 22 that look like at a relatively short interval

1 of 24 hours or 7 days?

strategy.

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here.

MEMBER LINCOFF: But not entirely 3 because, I mean, no one is suggesting here that the drug is better than just electrical 5 Cardioversion. If the idea was just a 6 strategy, then we would do a drug-based 7 strategy versus an electrical cardio-based

9 I mean, the purpose of these 10 studies was to determine if the drug could 11 eliminate the need for the electrical 12 Cardioversion, recognizing that if it didn't, 13 then one would go on. I mean, in practice, the idea would be that fewer patients 14 15 ultimately would have to have electrical Cardioversion because we believe that there 16 are some disadvantages to Cardioversion. 17 it was simply a strategy approach, then it 18 19 would be start off with electricity or start 20 off with drug and default to electricity. 21 And that really isn't the idea

The idea is if we can convert