

Food and Drug Administration Rockville MD 20857

JAN 27 2000

TRANSMITTED VIA FACSIMILE

Nanette E. Holston Manager, U.S. Regulatory Affairs Wyeth-Ayerst Research P.O. Box 8299 Philadelphia, PA 19101-8299

RE: NDA #20-859

Sonata (zaleplon) Capsules

MACMIS #8573

Dear Ms. Holston:

Through routine monitoring and surveillance, the Division of Drug Marketing, Advertising, and Communications (DDMAC) has become aware of a journal advertisement and a Brief Summary (ID# 78562-00) for Sonata that are false or misleading, and in violation of the Federal Food, Drug, and Cosmetic Act. Specifically, the advertisement and the Brief Summary are misleading because they omit the caveat from the Indications and Usage section of the approved product labeling (PI) that Sonata "has not been shown to increase total sleep time or decrease the number of awakenings."

To address this objection, DDMAC recommends that Wyeth-Ayerst Laboratories (Wyeth) do the following:

- 1. Immediately discontinue the use of this journal advertisement, Brief Summary, and any other promotional material with the same or similar issues. This would include evaluating other promotional material for failure to convey this caveat of Sonata's indication.
- 2. Respond to this letter, in writing, by February 7, 2000. Wyeth's response should include a statement of its intent to comply with the above, a list of all promotional materials with the same or similar issues, and Wyeth's methods for discontinuing these promotional materials.

If you have any questions or comments, please contact Dr. Lisa L. Stockbridge by facsimile at (301) 594-6771, or at the Food and Drug Administration, Division of Drug Marketing, Advertising and Communications, HFD-42, rm. 17B-20, 5600 Fishers Lane,

Nanette E. Holston Wyeth NDA 20-859 (MACMIS 8573)

Rockville, MD 20857. DDMAC reminds you that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID # 8573 in addition to the NDA number.

Sincerely, /S/

Lisa L. Stockbridge, Ph.D.
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications

ANNOUNCING

The First Solution for the Short-Term Treatment of Insomnia With Flexible Administration



Good Night's Sleep the Ability to Function

Patients need to remain in bed 4 or more hours before becoming active again. Until patients know how they will react to sleep agents, they should not engage in activities requiring mental alertness or motor coordination (e.g., driving or operating machinery) after taking SONATA or any sleep agent.

During treatment lasting 28 nights, with SONATA 5 or 10 mg, among the most common side effects were headache ($28\% \ vs\ 31\%$ for placebo), dizziness ($7\% \ vs\ 7\%$ for placebo), and somnolence ($5\% \ vs\ 3\%$ for placebo). Hypnotics should generally be limited to 7 to 10 days of use, and re-evaluation of the patient is recommended if hypnotics are taken for more than 2 to 3 weeks. Prescriptions for SONATA should not exceed a 1-month supply.

References: 1. Data on file, Wyeth-Ayerst Laboratories, Philadelphia, Pa. 2. SONATA (zaleplon) Prescribing Information, Wyeth-Ayerst Laboratories, Philadelphia, Pa.

Please see brief summary of Prescribing Information on adjacent page



Wake Up Ready to Function

Brief Summary
Sonata* (raleplon) Cansules
See package insert for full prescribing information.
Indications and Usage: Sonata is indicated for the short-term treatment of insomnia. Hypnotics should generally be limited to 7 to 10 days of use, and revealuation of the patient is recommended if they are to be taken for more than 2 to 3 weeks.
Sonata should not be prescribed in quantities exceeding a 1-month supply (see

nia. Hypnotics should generally be limited to 7 to 10 days of use, and revealuation of the patient is recommended if they are to be taken for more than 2 to 3 weeks. Sorata should not be prescribed in quantities exceeding a 1-month supply (see Warnings).

Contraindications: None known.

Warnings: Because sleep disturbances may be the presenting manifestation of a physical and/or psychiatric discorder, symptomatic treatment of insomnia should be initiated only after a careful evaluation of the patient. The failure of insomnia to remit after 7 to 10 days of treatment may indicate the presence of a primary psychiatric and/or medical illness that should be evaluated. Worsening of insomnia to the emergence of new thinking or behavior abnormalities may be the consequence of an unrecognized psychiatric or physical disorder. Such findings have emerged during the course of treatment with seadietive/hypnotic dugs, including Sorata. Because some of the important adverse effects of Sonata appear to be dose-related, it is important to use the lowest possible effective dose, especially in the elderly (see Dosage and Administration). A variety of abnormal thinking and behavior changes have been reported to occur in association with the use of sedative/hypnotics. Some of these changes may be characterized by decreased inhibition (eg. aggressiveness and extroversion that seem out of character, similar to effects produced by alcohol and other CNS depressants. Other reported behavioral changes have included bizare behavior, agilation, halucinations, and depersonalization. Amnesia and other neuropsychiatric symptoms may occur unpredictably, in primarily depressed patients, worsening of depressants. Other reported behavioral changes have included bizare behavior, agilation, halucinations, and depersonalization. Amnesia and other neuropsychiatric symptoms may occur unpredictably, in primarily depressed patients, worsening of depressance of any new behavioral sign or symptom of concern requires careful and immediate evaluation. Follo

of the commended for elderly patients to decrease the possibility of side effects (see **Dosage and Administration**). Elderly and/or debilitated patients should be

monitored diosely. Use in patients with concomitant illness: Clinical experience with Sonata in patients with concomitant systemic illness is limited. Sonata should be used with caution in patients with diseases or conditions that could affect metabolism or hemodynamic responses. Although preliminary studies did not reveal respiratory depressant effects at hyprotic doses of Sonata in normal subjects, caution should be observed if Sonata is prescribed to patients with compromised respiratory function, because sedative/hyprotics have the capacity to depress replicatory divise. Controlled trials of acute administration of Sonata 10 mg in patients with cronic obstructive pulmonary disease or moderate obstructive sleep apnea showed no audience atterations in blood gases or apnea/hypopone indice, respectively. However, patients with compromised respiration due to prevising ithress should be medicated to 5 mg in patients with mid to moderate hepatic impairment (see Dosage and Administration). It is not recommended for use in patients with severe enable maximum. No dose adjustment is necessary in patients with mid to moderate rerai impairment. No dose adjustment is necessary in patients with mid to moderate rerai impairment. No dose adjustment is necessary in patients with severe enable maximum. No dose adjustment is necessary in patients with mid to moderate rerai impairment. Use in patients with depression: As with other shaditive hyprotic drugs, Sonata should be administered with caution to patients exhibiting signs or symptoms of patients see OverRooSaGGI; therefore, the least amount of rung and is fasable should be prescribed for the patient at any one time. Homica ed closery. *Use in natients: with concomitant illness:* Clinical experience with Sonata in patients

INFORMATION FOR PATIENTS: Patient information is crinted in the complexe prescribing information.

LABORATORY TESTS. There are no specific laboratory tests recommended.

DRIG. INTERACTIONS: CNS-active Drugs—Ethanol. Socrate potentiated the CNS-impairing effects of ethanol. The potentiation resulted from a CNS pharmacuty characteristic interaction, zaleption did not affect the pharmacock-recus of ethanol. Imparamer/Thoridazine. Coarministration of anique doses or Sociat. 20 mg and imparamine 75 mg or thioritations 30 mg produced auditive effects on decreased ademices and impared psychomotor performance for 21 or 4 bruss after administration. The interaction was pharmacockyranic with no alteration of the pharmacockinetics of either drop.

the interaction was pramacodynamic with no alteration of the premiseration of either drug.
Paroxetine: Coadministration of a single dose of Schala 20 mg and paroxetine 20 mg daily for 7 days did not produce any interaction on psychomotor performance. Adoltionally, paroxetine did not alter the pharmacokinetics of Schata, reflecting the absence of a role of CYP206 in zalepion's metabolism.
Thougs that haddee CYP344—Riffampin: Miller e-dose administration of the coteni CYP344 inducer riffampin (600 mg every 24 hours, g24h, for 14 days) reduced alterion of a potent CYP344 enzyme inducer although not posing a safety concern, thus could lead to ineffectiveness of zalepion.

Drugs that limited CYP344—The coadministration of a potent, selective CYP344 inhibitor is not expected to produce a clinically important pharmacokinetic interaction with zaleplon; however, there are no clinicall stables specifically addressing this question.

Drugs that Inhibit CVP3A4—The coadministration of a potent, selective UrrsaA4 inhibitor is not expected to produce a clientally important pharmacokinetic interaction with zaleplon; however, there are no clinical studies specifically addressing this question. Drugs that Inhibit Aldehyde Oxidase—Diphethydramine; Diphethydramine is no pharmacokinetic interaction between zaleplon and diphethydramine in the administration of a single dose (10 mg and 50 mg, respectively) of each drug, however, because both of these compounds have CNS effects, an additive pharmacodynamic effect is possible. Drugs that Inhibit Both Aldehyde Oxidase and CVP3A4—Cimetidine; Cimetidine inhibits both haldehyde oxidase and CVP3A4—Cimetidine; Cimetidine inhibits both haldehyde oxidase (in vitro) and CVP3A4—Cimetidine; Cimetidine inhibits both haldehyde oxidase (in vitro) and CVP3A4—Cimetidine; Cimetidine inhibits both haldehyde oxidase (in vitro) and cimetidine (800 mg) produced an 85% increase in the mean Cm₂ and AUC of zalepion. An initial dose of 5 mg should be given to palients who are concenitantly being treated with cimetidine (see Dosage and Administration).

Drugs Highly Bound to Pfasma Protein—Zaleplon is not highly bound to plasma proteins (fraction bound 60%±15%); therefore, the disposition of zaleplon is not cause transient increase in free concentrations in protein binding, in addition, administration of Sonata to a palient taking another drug that is highly protein bound should not cause transient increase in free concentrations of the other drug.

Drugs With a Narrow Therapeutic Index—Diagon: Sonata (10 mg) did not affect the pharmacokinetic or prarmacokynamic profile of digoon (0.375 mg q24h for 8 days).

Warfarin, Multiple oral doses of Sonata (20 mg q24h for 13 days) did not affect the pharmacokinetics of warfarin (R+I+ or S-)-enantiomers or the pharmacodynamics (prothrombin time) folkowing a single 25 mg oral dose of warfarin. Drugs that After Renal Exception—libgroplen. There was no apparent pharmacokinetic interaction between zalepton and buprofilen following single dose administration (10 mg and 600 mg, respectively) of each drug. This was expected because zalepton is primarily metabolized, and renal excretion of unchanged zalepton accounts for less than 1% of the administered dose. CARCHOGNESS, MITARQNESS, AND MARMANIST OF ERITLITY—Carcinogeness: Mice received doses equivalent to 6-49 times the maximum recommended human dose (MHHIO) of 20 mg on a mg/m² basis. There was a significant increase in the incidence of hepatocellular adenomas in temale mice in the high dose group. Pats received doses equivalent to 0-5-10 times the MHHIO 2 Zaleption was not carcinogenic in rats.

incidence of hepatocellular aderiomas in female mice in the high desis group. Pats received doses equivalent to 0.5-10 times the MRHD. Zelepion was not ractinogenic in radia.

Malagenesis of patients as a castalogenic when tested for chromosomal aberrations in the in witto human hymphosotic in the in into Chinples hamster ovary cell assay in the in witto human hymphosotic in the interest of metabolic activation at the highest concentrations tested. Zelepion was not mutagenic in the Arnes bacterial gene mutation assay or the Chinese hamster ovary HGPRT gene mutation assay. Zelepion was not disclopenic in two lives a mouse point of the control of the Chinese hamster ovary HGPRT gene mutation assay. Zelepion was not disclopenic in two lives assays, the mouse bone marrow microniculeus assay and the rat bone marrow chromosomal aberration assay, and did not cause DNA damage in the rat hepatocyte unscheduled DNA synthesis assay.

In a marrow thoromosomal aberration assay, and did not cause DNA damage in the rat hepatocyte unscheduled DNA synthesis assay marrow microniculeus assay and the rat hepatocyte unscheduled DNA synthesis assay marrow microniculeus assay and the rat hepatocyte unscheduled DNA synthesis assay marrow microniculeus assay and the rat hepatocyte unscheduled DNA synthesis assay marrow microniculeus assay and the rat hepatocyte unscheduled DNA synthesis assay marrow microniculeus assay and the rat hepatocyte unscheduled DNA synthesis assay and decreased fertility were associated with administration of a road cose of zelepion of 100 mg/kg/day to males and females price to and during mailing. This dose is equivalent to 49 frat) sort and the properties of the female. PREGNANOY—Pregnancy Zelepony C. Oral administration of up to 100, and 50 mg/kg/day, respectively, to pregnant animals (rats and rabbits) throughout organogenesis prouced no evidence of treatogenicity. These doses are equivalent to 49 frat) and 46 (rabbit) times the maximum recommended human dose (MRHD) of 20 mg on a mg/mb asis), No adverse ef

are not known, it is recommended that nursing mothers not take Sonata: PEDIATRIG USE: The safety and effectiveness of Sonata in pediatric patients have not been established. GENATRIG USE: A total of 628 patients in double-blind, placebo-controlled, parallel-group clinical trials who received Sonata were at least 65 years of age; of these, 311 received 5 mg and 317 received 10 mg, in both seep laboratory and outpatient studies, elderly patients with insomnia responded to a 5-mg dose with reduced seep batency, and thus 5 mg is the recommended dose in this population. During short-term treatment r14 night studies) of elderly patients with Sonata, no adverse event with a frequency of all least 1% occurred at a significantly higher rate with either 5 mg or 10 mg Sonata than with placebo. Adverse Reactions: ADVERSE FINOINISS OSERVED in SHORT-TERM, PLACEBO-CONTROLLED TRIALS.—Adverse Events Associated with Discontinuation of Patienter in one premarketing placebo-controlled, parallel-group phase 2-3 clinical trials, 31-% of 744 patients who received placebo and 35-% of 2.069 patients who received Sonata at discontinuate treatment because of an adverse clinical event. This difference was not statistically significant. No event that resulted in discontinuation occurred at a rate of 2-1%. Adverse Events Documing at an incidence of 1% or More Among Sonata 20 Mg related Patients Table it enumerates, for a pool of three placebo-controlled 23-night studies of Sonata at doses of 5 or 10 mg and 20 mg, the incidence in placebo-treated patients reseted with Sonata 20 mg was greated that Sonata 20 mg where the incidence in placebo-treated patients. TABLE 1: holdence (94) of Treatment-emergent Adverse Events in Long-term.

TARLE 1: Incidence (%) of Treatment-emergent Adverse Events in Long-term

Body system	Placebo	Sonata 5 or 10 mg	Sonata 20 mg
Preferred term	(n = 277)	$(n = 513)^{-1}$	(n = 273)
Body as a whole			
Abdominal pain	4	5	6
Asthenia	5	5 2 28	50×3821
Fever	1	2	2
Headache	31		38
Malaise	<1	<1	2
Photosensitivity reaction	<1	<1	1
Digestive system			
Anoreka	<1	<1	2 1 7
Colitis	0 5 7	0 4 7	1
Dyspeps.a	5	4	7
Nausea	7	7	3
Metabolic and nutritional			
Peripheral edema	<1	<1	1
Musculoskeletal system			
Myalgia	4	7	ā
Nervous system			
Amnesia	1	2	4
Anxiety	2	<1	3
Depersonalization	<1 7	<1 7	4 3 2 5 1 2 3 5 2 1
Dizziness			5
Halfucinations	<1	·<1	1
Hypesthesia	0 1 3	<1	2
Paresthesia	1	3	3
Somnolence	3	<1 3 5 2	5
Tremor	1		2
Vertigo	<1	<1	1
Respiratory system			
Epistaxis	0	<1	1
Special senses			
Abnormal vision	<1	<1	2 1 4 2 2
Ear pain	0	<1	1
Eye pain	3	4	4
Hyperacusis	<1	<1 4 2 <1	2
Parosmia	1	<1	2
Urogenital system			

Events for which the incidence for Sonata 20 mg-treated patients was at least % and greater than the incidence among placebo-treated patients. Incidence reater than 1% has been rounded to the nearest whole number.

Dysmenorrhea

OTHER ADVERSE EVENTS OBSERVED DURING THE PREMARKETING EVALUATION OF SONATA OTHER ADMERSE EVENTS OBSERVED DURN'S THE PREMARKETING EVALUATION OF SOMATA-Following is a list of COSTART terms that reflect treatment-emergent adverse events as defined in the introduction to the Adverse Reactions section reported by patients treated with Sonata at doses in a range of 5 to 20 mg/day during premarketing phase 2 and 3 clinical trials throughout the burlest States. Canada and Europe including approximately 2800 patients. All reported events are include: except those already listed in Table 1 or elsewhere in labeling, and those events for which a drug cause was remote, and those event terms which were so general as to be uninformative. It is important to emphasize that, although the events reported occurred during treatment with Sonata, they were not necessarily caused by it. Events are further categorized by body system and listed in order of decreasing frequency according to the following of elimitions: frequent adverse events are those occurring on one or more occasions in at least 1700 patients; infrequent adverse

Events are further categorized by body system and listed in order of decreasing frequency according to the following definitions frequent adverse events are those occurring on earlier to provide the state of the s Frequent bronchtis; Infrequent astima, dysprea, laryrgitis, pneumonia, snoring, sobje attention: Rare: apnea, liccup, hyperentiation, pleural effusion, spetum increased. Skin and appendages. Frequent: proritus, rash; Infrequent: Acne, a ocecia, contact dermatitis, dry skin, eczema, maculopapular rash, skin hyperto-phy, sveating, unicaria, vesiculobullous rash; Rare: melanosis, sporiasis, pusificaria, skin discoloration. Special senses. Frequent: conjunctivitis; Infrequent: dipopia, dry eyes, protopriobal, binitius, watery eyes; Rare: abnormality of accom-modation, bephantis, cataract specified, comeal erosion, deafness, eye hemonthage, glaucoma, labyrinthitis; retinal detachment, taste loss, visual field defect. Urgognial system. Infrequent: bladder pain breast pain pustifis decreased urine steam.

modation, blephantis, cataract specified, comeal erosion, deathress, eye hemortrage, glaucoma, latyrinthis, certral detection, ethorinthis, certral detection, ethorinthis, certral detection, the programment cast less, visual hiad detect. <u>Boognital</u> system: Infrequent: bladder pain, breast pain, cystifis, decreased urine stream, dysuria, hematuria, impotence, kidney catculus, kidney pain, merorrhagia, metrorrhagia, urinary frequency, urinary inconfinence, urinary urgency, ragindiss. Rare: albuminuria, delayed menstrual period, leukorrhea, menopause, urethritis, urinary retention, vaginal hemortrage.

Drug Abuse and Dependence—CONTROLLED SUBSTANCE CLASS: Sorata is classified as a Schedule IV controlled substance by federal regulation.

ARISE DEPENDENCE AND TOLERANCE: Alxiss—Two studies assessed the abuse habitity of Sorata at doses of 25.50, and 75 mg in subjects with known histories of sedative drug abuse. The results of these studies indicate that Sonata has an abuse potential similar to berizodiazepine and berizodiazepine-like hyprotics. Dependence: The potential for developing psycaci dependence on Sonata and a subsequent withdrawal syndrome was assessed in controlled studies of 6 and 12-month durations by examing for the emergence of rebound insomine following drug discontinuation. Some patients ignications and in open-flael studies of 6 and 12-month durations by examing for the emergence of rebound insomine on the first night following withdrawal brapeared to be resolved by the second night. The use of the Benzodiazepine with 20 mg experienced a mile rebound insomine on the first night following withdrawal abuncing abuse of the continuation, ranging from mild dysphoria and insomnia to a withdrawal syndrome to inclinate of the miscle camps, sonding, sweeting, tremors, and convulsions. Seazues have been observed in two patients, ore of norm had a noro seazue, in dilicial trials with Sonata. Seazues and death have eas a sen to two patients, ore of human use. Because individuals with a history of umon haid a onor sezure, in clinical trials with somals, sezures and death have seen seen to lowing the withdrawal of zaleation from animals at doses many times nighter than those proposed for human use. Because individuals with a history of so into the doses of, drugs or alcohold are at risk of habituation and dependence may show be under careful small ance when the capacing Sonata or any other hypotolic Textures. Possible televiance to the thioristic effects of Sonata 10 and 20 mg was secretable to the companion of the secretable secretable secretable secretable secretable.

Tokarase, Possible tolerance to the historistic effects of Sonata 10 and 20 mg was assessed to evaluating time to sleep onese with Sonata compared with placebo in two position controlled 28-day studies. No development of tolerance to Sonata was observed for time to sleep onset over 4 weeks.

OVERDOSAGE: There is limited user-marketing clinical experience with the effects of an excitorist injection by a 21% year old boy of 20-40 mg of zaleption. The second was a 22, ear old man who took 100 mg categorism place 20 mg categorism place 20 mg categorism places.

Signs and Symptoms: Signs and symptoms: Signs and symptoms of overdose effects of CNS determined.

Signs and Symptoms: Signs and syntholism or overdose enterts or cyris depressants can be expected to present as exaggerations of the pharmacological effects order in preclinical testing. Overdose is usually manifested by degrees or centra, herous system depression ranging from drowniess to coma, in milic cases symptoms include drowsiness, mental confusion, and lethargy, in more serious cases, symptoms may include attack, hypotonia, hypotension, respiratory depression, rarely coma, and very rarely death.

depression, rare's coma, and very rarely death.

Recommended Treatment: General symptomatic and supportive measures should be used along with immediate gashic lavage where appropriate, Intravenous fluids should be administered as needed. Animal studies suggest that flumazent is an analogorist to zelepion. However, there is no premarketing clinical experience with the use of flumazent as an antidote to a Sonata overdose. As in all cases of drug overdose, respiration, cubic, clood pressure, and other appropriate signs should be monitored and general supportive measures employed. Hypotension and CNS depression should be monitored and treated by appropriate predicts ultimaterion.

medical intervention. Proison Control Center: As with the management of all overdosage, the possibility of multiple drug ingestion should be considered. The physician may wish to consider contacting a poison control center for up-to-date information on the management of hyprotic drug product overdosage. Based on Sonata CL 6001-1 issued August 13, 1999.

WYETH-AYERST LABORATORIES Philadelphia, PA 19101