

Data Extrapolation for Next Generation Cell-Therapies

Jonathan Jazayeri PharmD, MS, RAC
Executive Director, Global Regulatory Affairs

Case Study:

Brexucabtagene autoleucel (TECARTUS) development acceleration following axicabtagene ciloleucel (YESCARTA); two distinct CD19 directed CAR-T therapies

YESCARTA vs TECARTUS

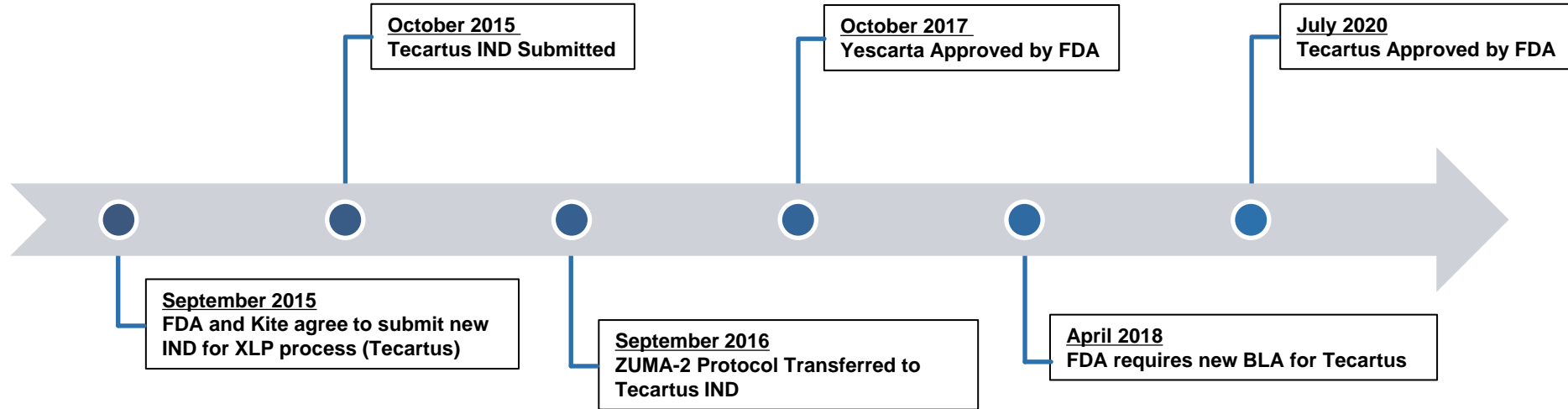
- **Distinct Products:**

- Same antigen, same vector
- Change in manufacturing alters therapeutic effect
 - Lymphocyte vs T-cell enrichment
 - Modified T-cell activation media
- Observed enhanced effectiveness against circulating tumor cells
- *Guidance for Industry: Interpreting Sameness of Gene Therapy Products Under the Orphan Drug Regulations (2021)*

- **Distinct Indications:**

- Opportunity for extrapolation may have been greater if the indications were conserved (ie. replacement)

TECARTUS Development History



Successful Data Extrapolation: What has worked

1. Starting Dose

- Starting dose was chosen based on approved dose for Yescarta
- 2 cohorts of dose exploration were conducted; no staggering, or other typical “FTIH” safety measures

2. Stability Data

- Results from stress studies to confirm analytical methods, and CCI testing to support the stability program, but not long-term stability conclusions

3. Safety Data

- FDA agreed to extrapolated the safety data from Yescarta and combine the REMS programs for both products

Next Generation Categories: Not all are the same



Change in Manufacturing

Same Antigen/Same Vector

New indications OR
Same indications (ie. replacement)

Greatest opportunity for data
extrapolation



Enhancements

Same Antigen/New Vector
- ex. transgenes

New indications OR
Same indications (ie. replacement)

Moderate opportunity for data
extrapolation

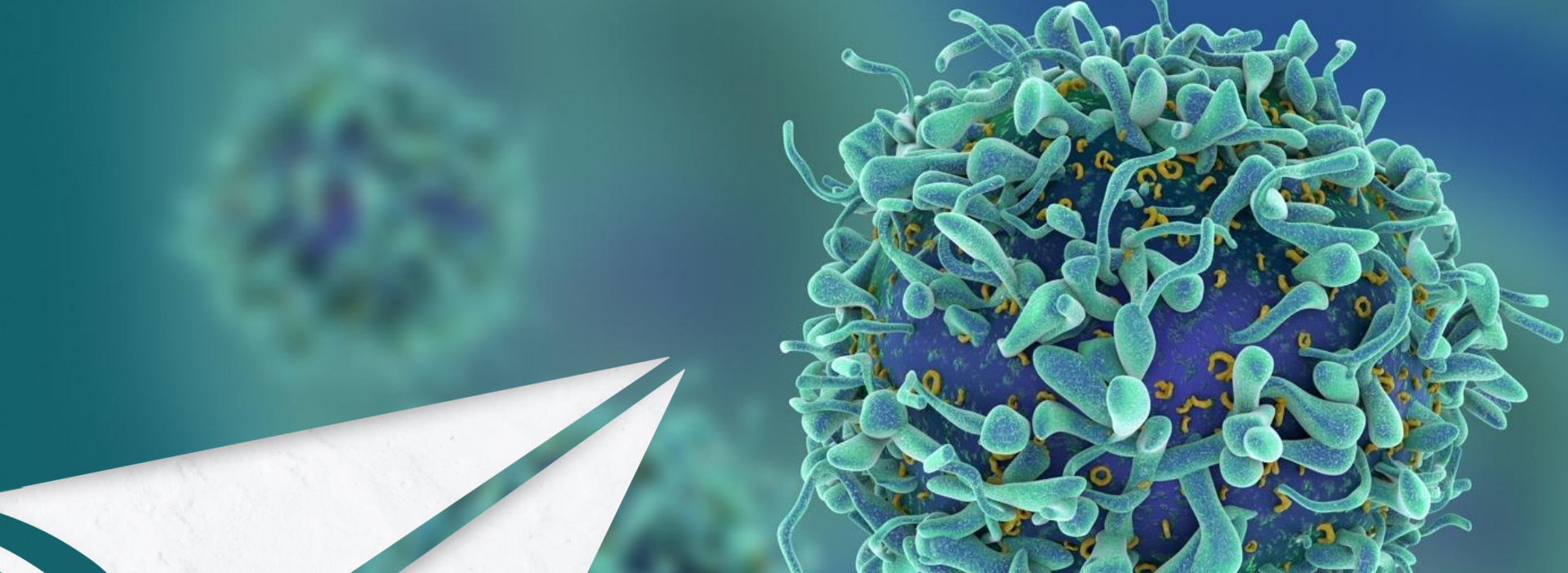


New Target

New/Dual Antigen
- Introduces new MoA

New indications
- Replacement more challenging

Lesser opportunity for data
extrapolation



Thank You