

4157

cc: Dr. D. M. Brennan
Dr. C. N. Christensen
Dr. L. Lemberger
Dr. C. E. Redman
Dr. P. Stark

June 16, 1982

Food and Drug Administration
Bureau of Drugs, HFD 120
Attention: Document Control Room 10B
5600 Fishers Lane
Rockville, Maryland 20857

Gentlemen:

Re: IND 12274 - Compound LY116140 - Fluoxetine Hydrochloride
(Psychotropic Agent)

Reference is made to Dr. Paul Leber's letter dated May 17, 1982,
pertaining to this notice.

One-year animal toxicity studies in the dog and rat have been
completed. A summary of the findings is included in this
submission. Detailed reports are in preparation and will be
submitted in the near future.

We have carefully considered your recommendation regarding the
disposition of patients as they complete the blind phase of the
fluoxetine efficacy studies. The suggestion was made that the
blind be maintained and that we "either routinely switch the
patients to fluoxetine if they are appropriate candidates for the
long-term exposure or continue patients on blind medication for
the extended phase."

Our current procedure requires that the investigator report, by
telephone, the final efficacy ratings on a given patient before he
is provided with the drug assignment for that patient. Our data
thus far indicate that fluoxetine has a lower incidence of certain
adverse effects than the reference drugs; however, there is
nothing discernibly unique about either the side effect profile or
the improvement seen with fluoxetine or the other study drugs.
Thus, we find it highly unlikely that breaking the code for
completing patients would invalidate the "blind" with respect to
others.

EXHIBIT

DOBBS 8

PZ 902 1557

Food and Drug Administration
Page 2 -
June 16, 1982

If we were to assign, on a blinded basis, all eligible patients who have completed the blind phase to fluoxetine, there would be the following results:

- patients who had responded favorably while on placebo would then receive an investigational drug unnecessarily
- patients who had responded favorably while on the reference drug (imipramine, amitriptyline, or doxepin) would then be changed to another drug unnecessarily

Neither condition, in our view, is consistent with good medical practice. Further, no comparative data would be available thereafter.

Alternatively, if we were to continue, on a blinded basis, the assigned study drug, the trial would become open-ended. Analysis of the data would be fraught with difficulty as the drop-out rate increased.

Our protocols provide for the collection of information on both fluoxetine and the reference agents over extended periods of time. The intent is primarily for safety purposes. Patients who have responded unfavorably to either placebo or a reference drug may be switched to fluoxetine. Those who have responded well on fluoxetine or the reference drug may continue on the assigned drug. Admittedly, thereafter, the fluoxetine and reference drug groups are not randomly assigned. Nevertheless, we will acquire some comparative safety data over a time span of several months.

We would be glad to discuss these subjects with you if a meeting is thought desirable.

Very truly yours,
E. LILLY AND COMPANY

Dorothy S. Dobbs, M.D.
Medical Advisor
Regulatory Affairs

DSD:lm

Enclosure

PZ 902 1558

JHM AUG 24 1983

Fits _____

FU _____

Copy To _____

Pax To _____

August 24, 1983

Dr. D. S. Dobbs
cc: Mr. D. A. Argay
Dr. C. H. Christensen
Dr. K. A. DeSante
Dr. L. Lamberger
Dr. J. A. Maraden

RE: PACKAGE INSERT FOR FLUOXETINE

Attached are Dr. Lamberger's and my comments on the package insert for fluoxetine. We will be glad to meet with you to discuss any of these changes.

R. F. Bergström, Ph.D.
4808

Confidential - Subject to Protective Order
In MDL Docket No. 907-U.S.D.C., S.D. Of
Indiana.

PZ 364 2864

EXHIBIT

DOBBS 2

CLINICAL PHARMACOLOGY:

Page 2 - first paragraph - last sentence:

CHANGE: "... would not be expected to affect
noradrenergic ..."

TO: "... would not be expected to directly affect
noradrenergic ..."

COMMENT: The key word in this description is directly.
Indirect effects on the noradrenergic and
dopaminergic neurons may be mediated by
fluoxetine's direct effect on serotonergic
neurons.

Page 3 - first paragraph - 2nd last sentence:

CHANGE: "... appeared in the urine and 16% in the
feces."

TO: "... appeared in the urine and 16% in the feces
over a five week period."

COMMENT: Reporting the total excretion of radioactivity
without reporting the time period over which the
total excretion occurs may be misleading.

Page 3 - second paragraph - first sentence:

CHANGE: (omit first sentence completely).

"Steady state levels are obtained ..."

TO: (replace first sentence with the following)
Plasma levels of fluxetine and the desmethyl
metabolite increase upon multiple dose
administration until steady state levels are
achieved and levels will persist for a prolonged
period of time after discontinuation of therapy.
Attainment of steady state levels requires a
period of time roughly equivalent to five times
the half life. When dosing regimens ...

COMMENT: In the clinical pharmacology section of the
package literature it is important to make
certain that the full ramifications of a long
half life drug are appreciated. Although it was
our suggestion to include a time to steady state
in the original draft of the package literature,
the essential prescribing information may be
more meaningful if a more generic statement is
included (omit the reference of 15 days or 25
days time to reach steady state). The generic
statement pertaining to half life should include
three salient points: (1) plasma levels of

fluoxetine and the desmethyl metabolite persist in plasma for a long time period after fluoxetine administration has ceased, (2) plasma levels of fluoxetine and the desmethyl metabolite will increase until steady state levels are achieved requiring a period of time roughly equivalent to five times the half life, and (3) changes in the dosage regimen for fluoxetine require an equivalent period of time for a new steady state to be achieved.

Page 4 - second paragraph - last sentence:

CHANGE: "However, with chronic administration there may be accumulation of unidentified metabolites in patients with impairment of renal function."

TO: "However, with chronic administration accumulation of fluoxetine or its metabolites may occur in patients with impairment of renal function."

COMMENT: In the package literature we should avoid the terminology "unidentified metabolites" as this statement may place a burden upon us at a future date to identify these metabolites or conduct further studies. Fluoxetine does have at the current time unidentified metabolites but work is continuing to make their structures known. The important point is to caution against the indiscriminate use of fluoxetine in renally impaired patients. In the new statement the word "accumulation" is to be interpreted to mean "above and beyond" the increase in levels that will normally occur for all patients. The intent is to remind the prescriber that use of fluoxetine in renally impaired individuals should be carefully monitored as for any drug being used in such patients.

PRECAUTIONS

Page 6 - first paragraph - add

ADD: A statement should be added that "Patients with suicidal ideation should be considered for hospitalization." *who are*

*considered
possibly suicidal*

PULVULES™

(TRADEMARK)

FLUOXETINE HYDROCHLORIDE

DESCRIPTION

(Trademark) (fluoxetine hydrochloride, Lilly) is an antidepressant for oral administration; it is chemically unrelated to tricyclic, tetracyclic, or other available antidepressant agents. It is designated (\pm)-N-methyl-3-phenyl-3-[α , α -trifluoro-p-tolyl]-oxy] propylamine hydrochloride, with the empirical formula of C₁₇H₁₈F₃NO HCl. It has a molecular weight of 345.79. The structural formula is as follows:

Fluoxetine is a white to off-white crystalline solid that is soluble at a concentration of 50 mg/ml in water. Stability assays have shown fluoxetine to be stable for periods of 24 months when exposed to temperatures of 25°, 40°, or 50°C.

Each Pulvule contains fluoxetine hydrochloride equivalent to 20, 30, 40, or 60 mg fluoxetine.

PZ 364 2867

CLINICAL PHARMACOLOGY

The mechanism of action of fluoxetine is not definitely known. The current hypothesis is that the clinical effects may be due to inhibition of the reuptake of serotonin into presynaptic neurons. In clinical studies, uptake of serotonin by platelets was decreased by greater than 60% after subjects had received 30 mg/day for one week. Animal studies suggest that therapeutic doses of fluoxetine, in contrast to tricyclic anti-depressants, would ~~not~~ be expected to ~~definitively~~ affect noradrenergic or dopaminergic neurons.

In double-blind efficacy studies, statistically significant improvement (as measured by the Hamilton Psychiatric Rating Scale for Depression) was seen after one week in patients who received ~~the~~ Trademark.

Fluoxetine is well absorbed following oral administration. Peak plasma levels of fluoxetine occur approximately 6 hours after the dose. Food causes a slight delay in the rate of absorption of fluoxetine but does not affect the extent of absorption. Fluoxetine may be administered with or without food.

~~One of the known metabolites of fluoxetine is desmethyl fluoxetine which is also a selective serotonin uptake inhibitor.~~

In normal volunteers, the half life of fluoxetine is about $3(\pm 2 \text{ S.D.})$ days. The half life of the desmethyl metabolite is generally longer than that of the parent compound, i.e., approximately $7(\pm 4 \text{ S.D.})$

days. Both fluoxetine and its desmethyl metabolite exhibit a very large volume of distribution (approximately 20-45 L/kg) and have relatively low plasma clearances (approximately 20 L/hr for fluoxetine and 9 L/hr for desmethyl fluoxetine). Based upon radiolabeled disposition studies of fluoxetine in normal subjects, approximately 60% of the radioactivity appeared in the urine and 16% in the feces. However, fluoxetine is highly metabolized; thus, very little unchanged compound is excreted in the urine.

*week?
month?*

Steady state levels are obtained in approximately 15 days for fluoxetine and 25 days for desmethyl fluoxetine. When dosing regimens are changed, new steady state levels will not be achieved until a similar period of time has elapsed. The steady state levels of fluoxetine and desmethyl fluoxetine ultimately achieved are proportional to the daily dose administered; however, the plasma levels vary widely from individual to individual.

In normal subjects, the projected or observed steady state plasma levels of desmethyl fluoxetine were generally higher than or equal to those of fluoxetine. The reverse was observed for most of the depressed patients in whom steady state plasma levels were measured.

In vitro, fluoxetine is approximately 94% bound to human serum protein.

When single doses of fluoxetine were administered to healthy elderly subjects, pharmacokinetic profiles for fluoxetine and desmethyl fluoxetine were not significantly different from the profiles in younger normal subjects.

Single doses of fluoxetine administered to subjects with various degrees of renal impairment demonstrated similar disposition of fluoxetine and desmethyl fluoxetine for subjects with normal, moderately impaired, severely impaired, and no (anephric) renal function. However, with chronic administration there may be accumulation of unidentified metabolites in patients with impairment of renal function.

The electrocardiograms of 312 patients who received Trademark in double-blind trials were retrospectively evaluated; no conduction abnormalities were observed.

INDICATIONS AND USAGE

(Trademark) is indicated for the relief of symptoms of various depressive disorders and for the associated anxiety in both hospitalized and outpatient populations. Based on the classification of the American Psychiatric Association's Diagnostic and Statistical Manual of Mental Disorders (Third Edition)¹, the effectiveness of (Trademark) has been demonstrated in both types of Major Depression, i.e., Major Depression, Single Episode, and Major Depression, Recurrent.

A diagnosis of Major Depression is based upon the presence of a prominent and persistent dysphoric or depressed mood plus at least four of the following eight symptoms: change in appetite, change in sleep, psychomotor agitation or retardation, loss of interest in usual activities or decrease in sexual drive, loss of energy or excess fatigue, feelings of guilt or worthlessness, diminished ability to think or concentrate, and suicidal ideation or attempts.

The effectiveness of (Trademark) in long term use, i.e., up to one year, has been shown in extensions of the controlled clinical studies; these included 221 patients evaluated for at least six months of whom 71 continued for over one year. The physician should periodically re-evaluate the usefulness of the drug for the individual patient.

CONTRAINDICATIONS

(Trademark) is contraindicated in patients with known hypersensitivity to the drug.

WARNINGS

None

PRECAUTIONS

General: The possibility of suicide in seriously depressed patients

is inherent in the illness and may persist until significant remission occurs. Therefore, in order to minimize the opportunity for overdosage, prescriptions should be written for the smallest number of capsules consistent with good patient management.

Information for Patients: Antidepressants may impair the mental and/or physical abilities required for the performance of potentially hazardous tasks, such as operating an automobile or other machinery; the patient should be cautioned accordingly.

Laboratory Tests: Rarely, low white blood cell counts or elevated transaminase levels have been noted in patients receiving (Trademark) or placebo. Leukocyte and differential counts and determination of transaminase levels are recommended during therapy with (Trademark) if indicated by clinical signs and symptoms.

Drug Interactions: The safety of (Trademark) given concomitantly with monoamine oxidase inhibitors has not been established. Single doses of secobarbital, warfarin, diazepam, chlorothiazide, and tolbutamide were given alone, following a single dose of fluoxetine, and following seven daily doses of fluoxetine. The pharmacokinetics of these drugs were unaltered by the concurrent administration of fluoxetine; no consistent clinical effects were attributable to concurrent fluoxetine administration. However, the concomitant administration of (Trademark) and barbiturates or other central nervous system depressants may result in excess sedation.

Therapeutic Interactions: Concurrent administration with electroshock therapy should be avoided because of the absence of experience in this area.

Carcinogenesis, Mutagenesis, Impairment of Fertility: The dietary administration of fluoxetine to rats for two years at levels equivalent to approximately 7.5 times the maximum recommended human dose produced no evidence of carcinogenicity.

Fluoxetine was shown to have no genotoxic effects based on the following mutagenicity assays: bacterial mutation assay, DNA repair assay in cultured rat hepatocytes, and in vivo sister chromatid exchange assay in Chinese hamster bone marrow.

Two fertility studies conducted in rats at doses of approximately 5 and 9 times the maximum recommended human dose indicated that fluoxetine had no adverse effects on fertility. A slight decrease in neonatal survival was noted and was probably associated with depressed maternal food consumption and weight gain.

(Multiples of the maximum recommended human dose are calculated on the basis of 80 mg/day in an individual weighing 60 kg.)

Pregnancy: Pregnancy Category B: No teratogenic effects were produced in rat fertility studies or in rat and rabbit teratology studies at doses of approximately 9 and 11 times respectively, the maximum recommended human dose. There are, however, no adequate and

well-controlled studies in pregnant women. Because animal reproduction studies are not always predictive of human response, this drug should be used during pregnancy only if clearly needed.

Nursing Mothers: It is not known whether this drug is excreted in human milk. Because many drugs are excreted in human milk, caution should be exercised when (Trademark) is administered to a nursing woman.

Pediatric Use: Safety and effectiveness in children have not been established.

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Indiana.

ADVERSE REACTIONS

It is recognized that the incidence of adverse drug reactions varies widely between studies of a given drug. Information presented in the table which follows is derived from double-blind placebo controlled studies of five or six weeks duration. The figures cited cannot be used to predict precisely the frequency of untoward events which may be observed in medical practice.

Number of Patients	<u>Adverse experience (Trademark)</u>	<u>% of Patients Reporting</u>		<u>Placebo</u>
		302	291	
<u>Autonomic Nervous System</u>				
Blurred vision		8		4
Constipation		6		4
Dry mouth		18		11
<u>Cardiovascular System</u>				
Hot flushes		2		1
Palpitations		2		1
Tachycardia		1		*
<u>Digestive System</u>				
Anorexia		6		2
Diarrhea		7		6
Dyspepsia		8		4
Nausea		23		10
Vomiting		1		1
Abdominal Pain		1		3
Taste Change		5		1
<u>Musculoskeletal System</u>				
Musculoskeletal Aches & Pains		6		7
<u>Central Nervous System</u>				
Anxiety		8		4
Bruxism		1		*
Concentration Increased		2		1
Confusion		2		1

Coordination Disturbance	1	
Dizziness/Lightheadedness	13	*
Dreams Abnormal	1	6
Drowsiness	1	1
Energy Decreased	16	7
Headache	1	*
Hypersomnia	15	17
Insomnia	2	*
Irritability	14	7
Libido Decreased	1	2
Nervousness	1	*
Sensation Disturbance (e.g., numbness, burning, tingling)	15	7
Tremor	3	3
	130	2
<u>Respiratory System</u>		
Sinus headache, congestion	1	3
<u>Skin and Appendages</u>		
Pruritis	2	2
Rash	12	2
Sweating, Excessive	1	3
<u>Special Senses</u>		
Tinnitus	2	1
<u>Urogenital System</u>		
Sexual Dysfunction (e.g., impotence, delayed ejaculation, decreased orgasm)	5	*
Urinary Frequency	3	*
Urination Impaired	1	*
<u>Other</u>		
Asthenia	7	3
Chills	2	*
Edema	1	*
Malaise	1	*

* = less than one percent

In addition to the relatively common (i.e., greater than 1%) untoward events enumerated above, the following adverse events have been reported in association with the use of (Trademark): flatulence, menstrual abnormalities, hypertension and hypotension, psychosis, hallucinations, abnormal involuntary movement, ataxia, galactorrhea, anemia, leukopenia, and akathisia.

One patient, in whom fluoxetine was continued after rash and pruritis occurred, developed a severe skin rash accompanied by fever and hepatic dysfunction. Another patient had erythema multiforme.

Two patient experienced episodes which may have been convulsions.

In controlled clinical trials, the mean weight loss among fluoxetine patients was 2.5 to 3 pounds over five or six weeks. _____ percent of patients lost 25% of their body weight and ___% gained 25%. Weight loss or, less commonly, weight gain may be viewed as desirable or adverse, depending on the patient's preexisting condition.

OVERDOSAGE

There is minimal clinical experience with acute overdosage with (Trademark). The oral LD₅₀ in mice and rats was found to be 248 and 466 mg/kg, respectively. Animals treated with multiples of the human therapeutic dose (25 times and greater) developed hyperirritability and convulsions. The drug and its active metabolite have long half lives; therefore, supportive care may be required for several days. Hemodialysis is unlikely to be of benefit.

DOSAGE AND ADMINISTRATION

Dosage should usually be started with 20 mg per day and may be increased by 20 mg increments daily. The usual adult daily dose is 20 to 80 mg, administered as a single daily dose or in two divided doses, preferably in the morning and/or at lunchtime. Doses above 80

mg per day are not recommended. In elderly patients, the total daily dose should rarely exceed 60 mg. Following remission, medication should be administered at the lowest dose consistent with maintaining clinical improvement.

HOW SUPPLIED

Pulvules:

20 mg (green and off-white)

30 mg (green and light yellow)

40 mg (green and dark yellow)

60 mg (green and pink)

National Drug Code xxxx

Store at controlled room temperature 15° - 30°C (59° - 86°F).

Caution: Federal law prohibits dispensing without prescription.

ANIMAL TOXICOLOGY

The subchronic and chronic administration of fluoxetine to mice, rats, and dogs has been associated with systemic phospholipidosis. The effect was shown to be reversible after chronic administration of approximately 7.5 times the maximum recommended human dose (i.e., 80 mg/day) of fluoxetine for one year in rats and dogs. Systemic phospholipidosis has been demonstrated in animals with a number of other cationic amphiphilic drugs including chlorphentermine, imipramine, and zimelidine². The significance of this finding for man is not known.

REFERENCES

1. Williams, J.B.W., Ed: Diagnostic and Statistical Manual of Mental Disorders-III, American Psychiatric Association, May, 1980.
2. Lullmann-Rauch, R. (1979). Drug-induced lysosomal storage disorders, in: Lysosomes in Biology and Pathology, vol. 6, pp. 49-130. Dingle, Jacques, and New (eds.), North-Holland, Amsterdam.

ELI LILLY AND COMPANY, Indianapolis, Indiana 46285 U.S.A. Literature issued xxxx, 1983

Pz 364 2879

DAA 0121 14:40GMT
IN04 0068 15:55GMT 06/26/84

ZCZC DAA121 GE1006
DL IND1
•GE1EL 06261440

ASHBROOK, EM	(IND1)	\$IND1*	31/2
HARDISON, CD	(IND1)	\$IND1*	22/3
<u>STARK, P</u>	(IND1)	\$IND1*	31/2
CC.:	ARGAY, DA	(IND1)	
	BANDAK, S	(HOPA)	
	BODWIN, S	(HOPA)	
	HEYMANNS, S	(GE1)	
	VON KEITZ, B	(GE1)	
	KOESTENBERGER, S	(GE1)	
	KUSHMIEREK, J	(ERL)	
	SPICKSCHEN, I	(GE1)	
	STEINMEYER, H	(GE1)	
	THOMPSON, WL	(IND1)	\$IND1*
	WAEGER, A	(BE1)	31/2
	WEINSTEIN, AJ	(IND1)	\$IND1*
	WOLD, J	(ERL)	31/2
	ZERBE, RL	(IND1)	\$IND1*

BAD HOMBURG JUNE 26, 1984 GLA
TELEX NO. 005

RE: FLUOXETINE - REGISTRATION GERMANY

THIS IS TO CONFIRM, WHICH ADDITIONAL DATA HAVE BEEN IDENTIFIED TO BE ESSENTIAL DURING OUR DISCUSSION AT THE BGA (JUNE 15, 84). ALL THE ISSUES WERE SUBJECT TO VARIOUS DISCUSSIONS WITH MEDICAL / MARKETING PERSONS ON THE OCCASION OF THE FLUOXETINE SYMPOSIUM / 14 TH C.I.N.P. CONGRESS:

1. EFFICACY DATA ON PATIENTS OF NON-ENDOGENOUS SUBTYPE. THIS COULD HELP US TO ACHIEVE THE "REACTIVE DEPRESSION" CLAIM.
2. THE BGA STATED THAT THERE IS A DISAGREEMENT BETWEEN PATIENT'S AND DOCTOR'S JUDGEMENT OF EFFICACY. SINCE IN THEIR OPINION THE PATIENT'S IMPRESSION IS MORE IMPORTANT, WE HAVE TO DEMONSTRATE CORRELATION BETWEEN SCL 58 AND HAMD AND CGI AND PGI RESP. (PERHAPS BY GRAPHS ?).
- 3.A A CRITICAL ISSUE FOR THE BGA IS SAFETY IN LONG-TERM TREATMENT. PATIENT NUMBERS OF 218 AND 74 TREATED FOR MORE THAN ONE HALF AND ONE YEAR RESP. MAY POSSIBLY NOT SATISFY OUR AUTHORITIES. THEIR CONCERN ARE LEUKOPENIA / AGRANULOCYTOSIS, HEPATOTOXICITY

AND POSSIBLE DAMAGE DUE TO PHOSPHOLIPIDOSIS (CONCERNING THE LATTER SEE 15).

SINCE THE DATA BASE HAS BEEN ENLARGED DURING THE PAST YEAR THE QUESTION IS, WHETHER YOU COULD PROVIDE US WITH THE RESP. SAFETY DATA ON INCREASED PATIENT NUMBERS.

B EVALUATION OF RECURRENTIES DURING LONG-TERM TREATMENT.

4. IN THE CONTROLLED TRIALS WE HAD ALL THE CONTRAINDICATIONS OF TRICYCLIC COMPARATORS (E.G. GLAUCOMA, URINARY RETENTION, SEVERE CARDIOVASCULAR DISEASE, ETC.) AS EXCLUSION CRITERIA. WE HAVE TO DEMONSTRATE - PERHAPS BY ANALYSIS OF OPEN TRIALS - THAT FLUOXETINE IS SAFE IN SUCH PATIENTS. OTHERWISE WE WILL HAVE TO NAME THOSE EXCLUSION CRITERIA ALSO AS CONTRAINDICATIONS IN THE PACKAGE INSERT.
THE SAME APPLIES TO SERIOUS SUICIDAL RISK, BIPOLAR ILLNESS, HYPERTENSIVE PATIENTS TREATED WITH CERTAIN ANTIHYPERTENSIVE DRUGS, HISTORY OF SEIZURES, HYPERTHYROIDISM.
5. POOLED IN-PATIENT DATA
6. ANALYSIS OF PRETREATMENT WITH OTHER ANTIDEPRESSANTS, NEUROLEPTIC DRUGS, OR TRANQUILIZERS (TO DEMONSTRATE THAT ONE WEEK OF WASH-OUT WAS SUFFICIENTLY LONG).
7. THE BGA EXPLAINED THEIR RESERVATIONS REGARDING CNS SIDE-EFFECTS
THERE HAVE BEEN A FEW PATIENTS COMPLAINING OF PSYCHOSIS AND HALLUCINATIONS.
PLEASE PROVIDE US WITH DETAILED REPORT, WHETHER THOSE PATIENTS SUFFERED FROM "PSYCHOTIC DEPRESSION", WHETHER THE HALLUCINATIONS DEVELOPED DURING TREATMENT OR HAVE PERHAPS BEEN PRESENT ALREADY AT START OF TREATMENT, OR WHETHER THOSE EVENTS MAY INDEED BE INTERPRETED BY "AGGRAVATION OF DISEASE".
8. PLEASE CONFIRM THAT A TOLERANCE TO FLUOXETINE DID NOT DEVELOP (DOSE OVER TIME) AND WITHDRAWAL SYMPTOMS HAVE NOT BEEN OBSERVED AFTER LONG-TERM TREATMENT (LONG ELIMINATION HALF-LIFE)
9. ALL KINDS OF SAFETY DATA WE HAVE ON CONCOMITANT INTAKE OF NEUROLEPTIC OR OTHER ANTIDEPRESSANT DRUGS.
10. COMPARATIVE USE OF CONCOMITANTLY TAKEN HYPNOTICS AND BENZODIAZEPINES IN AGITATED / RETARDED FLUOXETINE PATIENTS VERSUS AGITATED / RETARDED PATIENTS ON COMPARATORS.
REASON: THE BGA SUSPECTS FLUOXETINE TO BE A STIMULATING / ACTIVATING DRUG (SIDE-EFFECT PROFILE, SUICIDES, SUICIDE ATTEMPTS).
11. WE HAVE TO EVALUATE THE APPROXIMATE TREATMENT DURATION UNTIL ANTIDEPRESSANT EFFICACY USUALLY BECOMES EVIDENT (FOR PACKAGE INSERT INFORMATION).
12. THE BGA STATED THAT DUE TO THE ACCUMULATION OF FLUOXETINE WE SHOULD CONSIDER TO RECOMMEND A LOWER MAINTENANCE DOSE AFTER HAVING ACHIEVED A CERTAIN RELIEF OF ACUTE SYMPTOMS.
THEY ADVISED TO GIVE CLEAR INSTRUCTIONS CONCERNING DOSE-

ADJUSTMENT WITH TIME.

13. WE SHOULD CLEARLY DEFINE THE MAXIMUM DURATION OF TREATMENT WHICH WE ARE GOING TO RECOMMEND.
14. AS WE ALREADY EXPLAINED BY OUR TELEX TO DR. ZERBE OF JUNE 8, '84 WE NEED A CAREFUL ANALYSIS OF SUICIDES AND SUICIDE ATTEMPTS; PATIENT BY PATIENT, SYMPTOMATOLOGY / SEVERITY UPON ENTRY INTO THE STUDY AND WEEK BY WEEK UNTIL THE EVENT OCCURRED, DOSE OF FLUOXETINE, SIDE-EFFECTS, ETC
THIS IS A VERY SERIOUS ISSUE IN THE OPINION OF THE BGA.
IT MIGHT WELL BE THAT WE WILL HAVE TO RECOMMEND CONCOMITANT TRANQUILIZER INTAKE FOR THE FIRST 2 OR 3 WEEKS IN THE PACKAGE LITERATURE.
15. THE MOST IMPORTANT ISSUE IS THE LUNG AND EYE FINDINGS DURING FLUOXETINE TREATMENT.
THE BGA STATED THAT WE DID NOT APPLY NEWER TECHNIQUES (E.G. SCANNING, TOMOGRAPHY, BIOPSY) TO SUBSTANTIATE WHETHER THE CHANGES FROM NORMAL TO ABNORMAL WERE DRUG RELATED OR NOT. THE BGA CANNOT RULE OUT A DAMAGE SIMILAR TO THAT SEEN IN ANIMALS DUE TO PHOSPHOLIPIDOSIS.
ACTIONS, WHICH COULD HELP IN A NOT VERY PROMISING SITUATION:
 - A) OBTAIN OPINIONS FROM OPHTHALMOLOGIST AND PULMONOLOGIST, WHO HAVE EXAMINED FLUOXETINE PATIENTS.
 - B) PROVIDE DETAILED REPORT ON LYMPHOCYTE INVESTIGATIONS.
 - C) INVOLVE PROFESSOR LUELLmann

PLEASE EXCUSE IF THERE ARE SOME OF THE ISSUES ALREADY COVERED BY THE DATA WE RECEIVED IN THE MEANTIME.
WE HAD NOT ENOUGH TIME TO GO THROUGH IN DETAIL.
WE APPRECIATE ALL THE HELP WHICH WAS SPONTANEOUSLY OFFERED BY THE INDIANAPOLIS AND LONDON / ERL WOOD GROUPS OF STATISTICIANS, MEDICAL AND MARKETING COLLEAGUES.
NEVERTHELESS IT WILL BE A DIFFICULT EXERCISE FOR A FINAL SUCCESSFUL OUTCOME.

REGARDS
SCHENK, J
WEBER, HJ

(GE1)
(DE1)

106261443
NNNN

P22469 490

A

Resd. _____
File Discard _____
Follow Up _____
Pass to JLG
 GFKS
 LCH
Return To: _____
M. E. Amundson

May 28, 1982

Dr. L. Lemberger
Dr. P. Stark
cc: Dr. M. E. Amundson
Dr. D. M. Brennan
Dr. C. N. Christensen
Dr. C. E. Redman

Re: IND 12274 - Compound LY 10140 - Fluoxetine Hydrochloride (Psychotropic Agent)

Attached for your information is a letter dated May 17, 1982, from the Food and Drug Administration regarding the above IND.

A response to FDA has been drafted and will be forwarded in the near future.

Dorothy S. Dobbs
(3424)

lm
Attached

Confidential Subject to Protective Order
In MDL Docket No. 907 U.S.D.C., S.D. Of
Indiana.

EXHIBIT

DOBBS 7

PZ1301 758



DEPARTMENT OF HEALTH & HUMAN SERVICES

D.D. 101 20182

Public Health Service

IND 12,274

Food and Drug Administration
Rockville MD 20857

Lilly Research Laboratories
Attention: Dorothy S. Dobbs, M.D.
307 East McCarty Street
Indianapolis, Indiana 46285

MAY 17 1982

Gentlemen:

Please refer to your communications dated March 25 and April 12, 1982 pertaining to your Notice of Claimed Investigational Exemption for a New Drug for Fluoxetine HCl (LY 110140), IND 12,274.

We have reviewed your requests to amend protocols 26, 28, and 36 to (1) enable responders to continue treatment on an open-label basis for an "indefinite period of time", (2) eliminate the chest X-ray requirement for protocol 26, and (3) extend the duration of open-label study No. 36 from eight to 48 weeks. We have no objection to the elimination of the chest X-ray. However, without the necessary supporting animal studies, clinical exposure to fluoxetine should not exceed six months duration. We will require the submission of animal toxicity studies in two species of six months duration or greater.

We also recommend that when patients complete the blind phase of a trial, you maintain the blind and either routinely switch the patients to fluoxetine if they are appropriate candidates for the long-term exposure or continue patients on blind medication for the extended phase. Comparative data will be to your advantage, and breaking the code at the end of individual trials may invalidate the controlled conditions. That is, investigators may learn to associate certain side effects or improvement with one treatment or another.

Your cooperation and prompt response will be appreciated.

Sincerely yours,

Paul Leber, M.D.
Director (Acting)
Division of Neuropharmacological
Drug Products
Bureau of Drugs

PZ1301
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Lilly

Lilly Research Laboratories
A Division of Eli Lilly and Company

307 East McCarty Street
Indianapolis, Indiana 46285
(317) 251-2000

December 17, 1984

Food and Drug Administration
Center for Drugs and Biologics
Division of Neuropharmacological
Drug Products (HFN-120)
5600 Fishers Lane
Rockville, Maryland 20857

Gentlemen:

Re: NDA 18-936
"TRADEMARK", fluoxetine hydrochloride

Reference is made to the telephone conversation of October 22, 1984, between Dr. Hilary Lee and the undersigned at which time additional information was requested regarding concomitant drugs taken by patients who were enrolled in the controlled clinical trials of fluoxetine.

The requested information is appended.

Very truly yours,

ELI LILLY AND COMPANY

Dorothy S. Dobbs
Dorothy S. Dobbs, M.D.
Medical Advisor
Clinical Investigation
and Regulatory Affairs
(Neuroendocrinology)

Attachment

cc: Dr. Hilary Lee (HFN-120)

DEC 17 1984

EXHIBIT

STARK 6

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OR FINANCIAL INFORMATION, PRIVILEGED OR CONFIDENTIAL,
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COMPANY.

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In MDL Docket No. 907, U.S.D.C., S.D. of
Indiana.

Request: To provide additional summary information about concomitant medications used in the controlled studies

The following tables (1-22) show by study and for individual patients the "allowed psychotropics" (those permitted by the protocols), the "disallowed psychotropics", and "other CNS effect medications" (incorporates those suggested by the FDA reviewer).

The "allowed psychotropics" included benzodiazepine (not specified), temazepam, clonazepam, clorazepate, diazepam, lorazepam, nitrazepam, oxazepam, alprazolam, prazepam, chlordiazepoxide, flurazepam, and chloral hydrate.

The "disallowed psychotropics" included amphetamine, Combid, prochlorperazine, Eskatrol, meprobamate and aspirin, meprobamate, hydroxyzine, thiothixene, butabarbital, cocaine, ethchlorvynol, doxepin, amitriptyline, imipramine, Fiorinal with codeine, carisoprodol/phenacetin/aspirin, and Paxil Forte.

The "other CNS effect medications" included propranolol, cimetidine, Fiorinal, meperidine, diphenhydramine, phenylpropanolamine HCl, and phenylpropanolamine and caffeine.

Please note that the categories of other medications are not mutually exclusive, i.e., a given patient may be included in more than one.

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In MDL Docket No. 907
Indiana.

Dr. L. F. Fabre - Protocol 19
Reference Fluoxetine NDC 18-936:1.30/068-069

TABLE 1

Pt. No.	Study Drug	Concomitant Meds		Other CNS Effect Meds
		Allowed Psych	Disallowed Psych	
	fluoxetine	clorazepate hydrate		
	placebo	chloral hydrate, oxazepam	X	X
	placebo	chloral hydrate	X	
	placebo	chloral hydrate	X	
	placebo	chloral hydrate	X	
	placebo	chloral hydrate	X	
	fluoxetine	chloral hydrate	X	
	fluoxetine	chloral hydrate	X	
	fluoxetine	chloral hydrate	X	
	fluoxetine	chloral hydrate, amitriptyline	X	
		TOTAL	2	1

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To Protective Order

Dr. K. Rickels - Protocol 25
Reference Fluoxetine NDA 08-936:1.31/069-070

TABLE 2

Pt. No.	Study Drug	Concomitant Meds		Other CNS Effect Meds
		Allowed Psych	Disallowed Psych	
	fluoxetine	chloral hydrate	X	
	fluoxetine	chloral hydrate	X	
	fluoxetine	chloral hydrate, diazepam	X	
	fluoxetine	diazepam	X	
	placebo	cimetidine	X	
	placebo	chloral hydrate, hydrobromate		
	placebo	aspirin, fiorinal	X	X
	placebo	chloral hydrate, chlorazepoxide	X	
	placebo	diazepam	X	
	fluoxetine	chloral hydrate	X	
	fluoxetine	diazepam	X	
	placebo	cimetidine	X	
	fluoxetine	chloral hydrate	X	
	fluoxetine	diazepam	X	
				TOTAL U.S.D.C., S.D.I. Or
				3

3
TOTAL U.S.D.C., S.D.I. Or
3

TABLE 3

Protocol 24
Reference Fluoxetine MD# 18-936:1.61/090, 093

Pt. No.	Study Drug	Concomitant Meds	Allowed	Disallowed	Other CNS Effect Meds
			Psych	Psych	
	fluoxetine	carbamyl hydrate	X	X	
	placebo	meprobamate		X	
	fluoxetine	propranolol		X	
	placebo	propantheline		X	
	fluoxetine	diazepam, doxepin	X	X	
	placebo	lorazepam		X	
	fluoxetine	total	2	2	2

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Lima, Ohio.

Dr. J. D. Brenner - Protocol 20
Reference Fluoxetine N.C. 936:1.42/071-072

TABLE 4

Pt. No.	Study Drug	Concomitant Meds		Other CNS Effect Meds
		Allowed Psych	Disallowed Psych	
	fluoxetine	hydroxyzine, diphenhydramine		X
	imipramine	chloral hydrate		X
	fluoxetine	chloral hydrate		X
	fluoxetine	clorazepate		X
	fluoxetine	clorazepate		X
	imipramine	diazepam		X
	fluoxetine	diazepam		X
	imipramine	diazepam		X
	fluoxetine	diazepam		X
	imipramine	diazepam		X
	fluoxetine	diazepam		X
	imipramine	cimetidine		X
	imipramine	diazepam		X
	imipramine	propranolol		X

total U.S.D.C., S.D., Or
No. 907 Protective Order
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<u>Concomitant Meds</u>	<u>Concurrent Drugs</u>	<u>Concurrent Conf.</u>	<u>Allowed Psych</u>	<u>Disallowed Psych</u>	<u>Other CNS Effect Meds</u>
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TABLE 5 (continued)

Dr. W. L. Masco - Protocol 22
Reference Fluoxetine NDA 8-936:1.45/072-074

Pt. No.	Study Drug	Concomitant Meds		Other CNS Effect Meds
		Allowed Psych	Disallowed Psych	
[REDACTED]	fluoxetine	chloralose, flurazepam	X	
[REDACTED]	amitriptyline	chlor diazepoxide	X	
[REDACTED]	fluoxetine	cis etidrine	X	
[REDACTED]	fluoxetine	flurazepam	X	
[REDACTED]	amitriptyline	flurazepam	X	
[REDACTED]	fluoxetine	diazepam	X	
[REDACTED]	fluoxetine	flurazepam	X	
[REDACTED]	amitriptyline	flurazepam	X	
[REDACTED]	fluoxetine	diazepam, flurazepam	X	
[REDACTED]	amitriptyline	flurazepam, diazepam	X	
[REDACTED]	fluoxetine	chlor diazepoxide		
[REDACTED]	amitriptyline	clorazepate		
[REDACTED]	fluoxetine	lorazepam		
[REDACTED]	amitriptyline	flurazepam, diazepam		

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torts 33

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Dr. J. P. Feighner - Protocol 23
Reference Fluoxetine NDA-18-936:1.46/075-077

TABLE 6

Pt. No.	Study Drug	Concomitant Meds		Allowed Psych	Disallowed Psych	Other CNS Effect Meds
		Concomitant	Meds			
	amitriptyline	clorazepate		X		
	fluoxetine	fluoxetine		X		
	amitriptyline	lorazepam		X		
	amitriptyline	propranolol		X		
	fluoxetine	potassium bromate		X		
	amitriptyline	triazepan		X		
	fluoxetine	diazepam		X		
	fluoxetine	chloral hydrate		X		
	fluoxetine	chloral hydrate, chloral hydrate		X		
	amitriptyline	clorazepate		X		
	fluoxetine	chloral hydrate		X		
	amitriptyline	diazepam		X		
	fluoxetine	chloral hydrate		X		
	amitriptyline	diazepam		X		
	fluoxetine	chloral hydrate		X		

2 Total 11 Protective to USDC, S.D., Of

U.S.D.C., S.D., Of

Protective Order

2 Total 11 Protective to USDC, S.D., Of

U.S.D.C., S.D., Of

Protective Order

TABLE 7

Dr. G. Chouinard - Protocol 26
Reference Fluoxetine N° 119-936:1.47/074-075

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
1000	fluoxetine	citalopram	X		
1001	fluoxetine	diazepam	X	X	
1002	amitriptyline	diazepam	X	X	
1003	fluoxetine	diazepam	X	X	
1004	amitriptyline	diazepam	X	X	
1005	fluoxetine	diazepam	X	X	
1006	fluoxetine	diazepam	X	X	
1007	amitriptyline	diazepam	X	X	
1008	fluoxetine	diazepam	X	X	
1009	fluoxetine	diazepam	X	X	
1010	amitriptyline	diazepam	X	X	
1011	fluoxetine	diazepam	X	X	
1012	fluoxetine	oxazepam	X	X	
1013	fluoxetine	diazepam	X	X	
1014	amitriptyline	diazepam	X	X	
1015	amitriptyline	diazepam, flurazepam	X	X	
					TOTAL 17

TABLE 8

Dr. J. P. Feighner - Protocol 27
Reference Fluoxetine NDA 18-936; 1.32/119-124

<u>Pt. No.</u>	<u>Study Drug</u>	<u>Concomitant Meds</u>		<u>Other CNS Effect Meds</u>
		<u>Allowed Psych</u>	<u>Disallowed Psych</u>	
1	placebo	propranolol		x
2	fluoxetine	Flodil [®]		x
3	imipramine	Fiorinal [®]		x
4	imipramine	chloral hydrate		x
5	fluoxetine	cliazepam		x
6	placebo	chloral hydrate, cliazepam, propantheline	x	x
7	imipramine	chloral hydrate, propantheline, doxepin	x	x
8	fluoxetine	chloral hydrate, flurazepam, diphenhydramine	x	x
9	placebo	chloral hydrate, propantheline	x	x
10	imipramine	chloral hydrate, flurazepam, oxazepam	x	x
11	imipramine	chloral hydrate, flurazepam	x	x
12	placebo	chloral hydrate, cimetidine, propantheline	x	x
13	fluoxetine	flurazepam		x
14	imipramine	flurazepam		x
15	imipramine	chloral hydrate		x
16	imipramine	chloral hydrate		x
17	placebo	chloral hydrate		x
18	placebo	chloral hydrate		x
19	imipramine	chloral hydrate		x
20	placebo	chloral hydrate		x
21	imipramine	chloral hydrate		x
22	placebo	chloral hydrate		x
23	fluoxetine	chloral hydrate, flurazepam, cimetidine	x	x

U.S.D.C. S.D.O. Or
Protective Order

TABLE 8 (continued)

Dr. J. P. Feighner - Protocol 27
Reference Fluoxetine NDC 08-936:1.32/119-124

Pt. No.	Study Drug	Concomitant Meds	Allowed		Disallowed		Other CNS Effect Meds
			Psych	Psych	Psych	Psych	
[REDACTED]	placebo	clobutidine					X
[REDACTED]	placebo	chloral hydrate, meperidine	X				X
[REDACTED]	placebo	chloral hydrate	X				X
[REDACTED]	imipramine	diphenhydramine					
[REDACTED]	placebo	flurazepam					
[REDACTED]	fluoxetine	disesepam, flurazepam	X				
[REDACTED]	placebo	disesepam	X				
[REDACTED]	imipramine	cimetidine					
[REDACTED]	fluoxetine	chloral hydrate					X
[REDACTED]	placebo	propantheline					X
[REDACTED]	placebo	chloral hydrate, eloxazine					
[REDACTED]	imipramine	flurazepam					
[REDACTED]	imipramine	disesepam	X				
[REDACTED]	imipramine	flurazepam	X				
[REDACTED]	imipramine	flurazepam	X				
[REDACTED]	placebo	flurazepam	X				
[REDACTED]	fluoxetine	chloral hydrate					
[REDACTED]	imipramine	flurazepam					
[REDACTED]	fluoxetine	cimetidine					
[REDACTED]	placebo	chloral hydrate					
[REDACTED]	imipramine	flurazepam					
[REDACTED]	fluoxetine	flurazepam, diphenhydramine					X
[REDACTED]	placebo	flurazepam					
[REDACTED]	imipramine	flurazepam, cimetidine					X
[REDACTED]	imipramine	cimetidine					X
[REDACTED]	fluoxetine	chloral hydrate					X

TABLE 8 (continued)

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
[REDACTED]	imipramine	triazepam, diphenhydramine	X		X
[REDACTED]	fluoxetine	sepiotofine			X
[REDACTED]	fluoxetine	prochlorperazine, cimetidine			X
[REDACTED]	fluoxetine	chloral hydrate	X		
[REDACTED]	imipramine	triazepam	X		
[REDACTED]	placebo	triazepam	X		
[REDACTED]	imipramine	fluoxetine	X		
[REDACTED]	placebo	chloral hydrate, frusemide	X		
[REDACTED]	imipramine	chloral hydrate	X		
[REDACTED]	placebo	chloral hydrate	X		
[REDACTED]	placebo	chloral hydrate	X		
[REDACTED]	fluoxetine	chloral hydrate	X		
[REDACTED]	imipramine	chloral hydrate	X		

TOTAL U.S.D.C. S.D.O. 56

23

U.S.D.C. S.D.O. Protective Order

Dr. J. B. Cohn - Protocol 27
Reference Fluoxetine NDA 936:1.34/121-126

TABLE 9

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
	fluoxetine	dihydroxydramine			x
	placebo	propoxyphene			x
	imipramine	chloral hydrate			x
	fluoxetine	chloral hydrate	x		x
	imipramine	Florinal	x		x
	placebo	propantheline HCl	x		x
	fluoxetine	Parafon Forte	x		x
	placebo	cimetidine	x		x
	imipramine	propranolol	x		x
	placebo	cimetidine	x		x
	placebo	cimetidine	x		x
	fluoxetine	chloral hydrate	x		x
	fluoxetine	chloral hydrate	x		x
	imipramine	flurazepam	x		x
	imipramine	cimetidine	x		x
	fluoxetine	propranolol	x		x
			TOTAL	10	

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TABLE 10

Dr. J. D. Bremner - Protocol 27
Reference Fluoxetine NDC 038-936:1.36/081-083

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
[REDACTED]	fluoxetine	flurazepam chloral hydrate, flurazepam	X	X	
[REDACTED]	placebo		X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	
[REDACTED]	fluoxetine	chloral hydrate	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	
[REDACTED]	imipramine	chloral hydrate, flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	chloral hydrate, flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	cimetidine, propranolol	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	cimetidine	X	X	
[REDACTED]	imipramine	cimetidine	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	flurazepam	X	X	
[REDACTED]	imipramine	propranolol	X	X	
[REDACTED]	imipramine	flurazepam, carisoprodol/ phenacetin/aspirin, cimetidine	X	X	X
TOTAL			23	1	5

TABLE 11

Dr. D. L. Dunner - Protocol 27
Reference Fluoxetine NPA 18-936:1.37/089-093

Pt. No.	Study Drug	Concomitant Meds		Allowed Psych	Disallowed Psych	Other CNS Effect Meds
		Concomitant	Meds			
	imipramine	diphenhydramine				X
	fluoxetine	chloral hydrate, flurazepam		X		
	fluoxetine	diphenhydramine				X
	fluoxetine	diazepam				X
	placebo	parafon forte		X		
	placebo	chloral hydrate			X	
	placebo	cetotifen				X
	placebo	parafon forte		X		
	imipramine	prazepam			X	
	placebo	parafon forte			X	
	imipramine	chloral hydrate				X
	placebo					
	placebo					

*Imipramine
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TOTAL 3

TABLE 12

Dr. B. I. Grosser - Protocol 27
Reference Fluoxetine N# 98-9361:39/094-096

Pt. No.	Study Drug	Concomitant Meds	Allowed	Disallowed	Other CNS Effect Meds
			Psych	Psych	
1	imipramine	fluoxetine flurazepam	x	x	
2	placebo	flurazepam	x	x	
3	fluoxetine	flurazepam	x	x	
4	placebo	flurazepam	x	x	
5	fluoxetine	propantheline imipramine	x	x	
6	placebo	propantheline	x	x	
7	fluoxetine	imipramine fluoxetine	x	x	
8	placebo	cimetidine	x	x	
9	fluoxetine	cimetidine	x	x	
10	placebo	flurazepam	x	x	
11	fluoxetine	flurazepam	x	x	
12	placebo	flurazepam	x	x	
13	fluoxetine	cimetidine	x	x	
14	placebo	prochlorperazine	x	x	
15	fluoxetine	flurazepam	x	x	
16	placebo	flurazepam	x	x	
17	imipramine	flurazepam	x	x	
18	fluoxetine	flurazepam	x	x	
19	placebo	flurazepam	x	x	
20	placebo	cimetidine	x	x	
TOTAL				15	

TABLE 13

Dr. F. S. Abuzezehab - Protocol 27
Reference Fluoxetine May 18-936:1.40/088-090

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
Pre- Imipramine	clomipramine				X
Imipramine	diphenhydramine				X
Fluoxetine	chloral hydrate				X
Placebo	clorazepate				X
Fluoxetine	temazepam, clorazepate		X		
Placebo	temazepam, clorazepate		X		
Fluoxetine	temazepam, clorazepate		X		
Placebo	clorazepate		X		
Fluoxetine	flurazepam		X		
Placebo	flurazepam		X		
Imipramine	flurazepam		X		
Imipramine	temazepam		X		
Placebo	chloral hydrate, flurazepam		X		
Imipramine	flurazepam		X		
Imipramine	clorazepate		X		
Imipramine	flurazepam		X		
Fluoxetine	chloral hydrate, flurazepam		X		
Imipramine	flurazepam		X		
Fluoxetine	diphenhydramine		X		
Imipramine	flurazepam		X		
Placebo	imipramine		X		
Fluoxetine	chloral hydrate		X		
Imipramine	flurazepam		X		
Placebo	chloral hydrate		X		

TABLE 13 (continued)

Dr. Y. S. Abuzzahab - Protocol 27
Reference Fluoxetine NKA 18-936:1.40/088-090

Pt. No.	Study Drug	Concomitant Meds		Other CHS Effect Meds
		Allowed Psych	Disallowed Psych	
[REDACTED]	fluoxetine	X		
[REDACTED]	imipramine	X		
[REDACTED]	placebo	X		
[REDACTED]	imipramine	X		
[REDACTED]	propantheline	X		
[REDACTED]	placebo	X		
[REDACTED]	clorazepate	X		
[REDACTED]	chloral hydrate	X		
[REDACTED]	clozapine	X		
[REDACTED]	placebo	X		

26 1 6

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TABLE 14

- Protocol 27
Reference Fluoxetine NDA 18-936: 1.61/091, 092, 094

Pt. No.	Study Drug	Concomitant Meds		Allowed Psych	Disallowed Psych	Other CNS Effect Meds
		Placebo	Fluoxetine			
[REDACTED]	placebo	oral hydrate		X		X
[REDACTED]	fluoxetine	cimetine		X		
[REDACTED]	placebo	flurazepam				
		TOTAL		2	-	1

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TABLE 15

Dr. J. P. Feighner - Protocol 29
 Reference Fluoxetine NDA 01-936:1.43/076-078

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
[REDACTED]	fluoxetine	diphenhydramine	X	X	X
[REDACTED]	imipramine	fluoxetine	X	X	X
[REDACTED]	imipramine	flurazepam	X	X	X
[REDACTED]	imipramine	alprazolam, fluoxetine	X	X	X
[REDACTED]	imipramine	propanolol	X	X	X
[REDACTED]	imipramine	fluoxetine, diphenhydramine	X	X	X
[REDACTED]	imipramine	fluoxetine, diphenhydramine	X	X	X
[REDACTED]	fluoxetine	chloral hydrate, chloral hydrate	X	X	X
[REDACTED]	fluoxetine	chloral hydrate	X	X	X
[REDACTED]	imipramine	fluoxetine, cimetidine	X	X	X
[REDACTED]	fluoxetine	chloral hydrate	X	X	X
[REDACTED]	imipramine	chloral hydrate, prochlorperazine	X	X	X
[REDACTED]	fluoxetine	chloral hydrate, diphenhydramine	X	X	X
[REDACTED]	imipramine	chloral hydrate, diphenhydramine	X	X	X
[REDACTED]	imipramine	chloral hydrate, Parafon Forte	X	X	X
[REDACTED]	fluoxetine	chloral hydrate, cocaine	X	X	X
[REDACTED]	fluoxetine	chloral hydrate	X	X	X
[REDACTED]	imipramine	chloral hydrate	X	X	X
[REDACTED]	imipramine	chloral hydrate	X	X	X
[REDACTED]	fluoxetine	chloral hydrate	X	X	X
[REDACTED]	imipramine	chloral hydrate	X	X	X
[REDACTED]	fluoxetine	chloral hydrate	X	X	X
[REDACTED]	fluoxetine	chloral hydrate	X	X	X

TABLE 15 (continued)

Dr. J. P. Feighner - Protocol 29
Reference Fluoxetine NDA 08-036:1.43/076-078

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
1	fluoxetine	chloral hydrate	X		
2	imipramine	chloral hydrate	X		
3	imipramine	chloral hydrate	X		
4	fluoxetine	chloral hydrate	X		
5	imipramine	chloral hydrate	X		
6	imipramine	chloral hydrate	X		
7	fluoxetine	chloral hydrate	X		
8	fluoxetine	chloral hydrate	X		
9	fluoxetine	chloral hydrate	X		
10	fluoxetine	chloral hydrate	X		
11	imipramine	chloral hydrate	X		
12	fluoxetine	chloral hydrate	X		
13	fluoxetine	chloral hydrate	X		
14	imipramine	chloral hydrate	X		
15	fluoxetine	chloral hydrate	X		
16	fluoxetine	chloral hydrate	X		
17	fluoxetine	chloral hydrate	X		
18	fluoxetine	chloral hydrate	X		
19	imipramine	chloral hydrate	X		
20	imipramine	chloral hydrate	X		

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Dr. J. H. Davis - Protocol 29
Reference Fluoxetine NDA 08-936:1.44/076-077

TABLE 16

Dr. J. M. Davis - Protocol 29
Reference Fluoxetine #PA 18-936:1.44/076-077

TABLE 16 (continued)

Pt. No.	Study Drug	Concomitant Meds		Allowed Psych	Disallowed Psych	Other CNS Effect Meds
		chloral hydrate, hydroxyzine, meprobamate chloral hydrate chloral hydrate chloral hydrate chloral hydrate chloral hydrate	X X X X X			
	imipramine					X
	fluoxetine					X
	fluoxetine					X
	imipramine					X
		TOTAL	25	2	6	

Dr. A. Kiev - Protocol 31
Reference Fluoxetine NIK 936:1.48/072-073

TABLE 17

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
[REDACTED]	fluoxetine	[REDACTED], propanolol	X		X
[REDACTED]	fluoxetine	flurazepam	X		
[REDACTED]	fluoxetine	benzodiazepine, flurazepam	X		
[REDACTED]	fluoxetine	cocaine	X		
[REDACTED]	fluoxetine	clorazepate, flurazepam	X		
[REDACTED]	fluoxetine	clorazepate, flurazepam	X		
[REDACTED]	fluoxetine	clorazepate, flurazepam	X		
[REDACTED]	fluoxetine	doxepin	X		
[REDACTED]	fluoxetine	hydroxyzine	X		
[REDACTED]	fluoxetine	hydroxyzine	X		
[REDACTED]	fluoxetine	hydroxyzine	X		
[REDACTED]	fluoxetine	chloral hydrate	X		
[REDACTED]	fluoxetine	chloral hydrate	X		
[REDACTED]	fluoxetine	flurazepam	X		

Subject to Protective Order
No. 907 U.S.D.C., S.D. Or
TOTAL 10 2 1

TABLE 18

Dr. H. L. Monaco - Protocol 31
Reference Fluoxetine NDA 01-936:1.49/080-083

Pt. No.	Study Drug	Concomitant Meds		Other CNS Effect Meds
		Allowed Psych	Disallowed Psych	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	flurazepam	x	
[REDACTED]	doxepin	flurazepam	x	
[REDACTED]	doxepin	Parafon Forte	x	
[REDACTED]	doxepin	fluoxetine, diphenhydramine	x	
[REDACTED]	doxepin	doxepin, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	fluoxetine	chloral hydrate, propantheline	x	
[REDACTED]	doxepin	chloral hydrate, flurazepam	x	
[REDACTED]	doxepin	flurazepam, Fiorinal with codeine, cimetidine	x	x

TABLE 18 (continued)

Dr. W. L. Masco - Protocol 31
Reference Fluoxetine NPFY8-936:1.49/080-083

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
	doxepin	propanolol chloral hydrate, Parafon Forte	X	X	X
	fluoxetine	flurazepam	X		
	doxepin	chloral hydrate	X		X
	doxepin	propanolol	X		
	doxepin	chloral hydrate	X		
	doxepin	chloral hydrate, cimetidine, propofol	X		X
	fluoxetine	chloral hydrate, propofol	X		X
	fluoxetine	chloral hydrate, cimetidine	X		X
	fluoxetine	chloral hydrate, cimetidine	X		X
		TOTAL	5	8	

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No. 907, U.S.D.C., S.D., Or

Dr. J. P. Feighner - Proprietary
Reference Fluoxetine NDA 05-936:1.50/076-078

TABLE 19

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych		Disallowed Psych		Other CNS Effect Meds
			X	X	X	X	
[REDACTED]	doxepin	chlorhydrate					
[REDACTED]	doxepin	flurazepam, chlorvynol, propanolol	X	X	X	X	
[REDACTED]	doxepin	propanolol	X	X	X	X	
[REDACTED]	doxepin	triazepam	X	X	X	X	
[REDACTED]	doxepin	triazepan	X	X	X	X	
[REDACTED]	fluoxetine	fluoxetine, propantheline	X	X	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	X	X	
[REDACTED]	doxepin	propanolol	X	X	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	doxepin	propanolol	X	X	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	X	X	
[REDACTED]	doxepin	propanolol	X	X	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	X	X	
[REDACTED]	doxepin	cimetidine	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	doxepin	chloral hydrate	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
[REDACTED]	doxepin	diphenhydramine	X	X	X	X	
[REDACTED]	fluoxetine	chloral hydrate	X	X	X	X	
[REDACTED]	doxepin	diphenhydramine	X	X	X	X	
[REDACTED]	fluoxetine	flurazepam	X	X	X	X	
[REDACTED]	doxepin	flurazepam	X	X	X	X	
TOTAL			21	1	1	1	7

Dr. J. B. Cohn - Protocol 33
Reference Fluoxetine NDA 18-936:1.51/104-107

TABLE 20

Pt. No.	Study Drug	Concomitant Meds		Allowed Psych	Disallowed Psych	Other CNS Effect Meds
		Concomitant Meds	Concomitant Meds			
	fluoxetine	propanolol				x
	fluoxetine	cimetidine				x
	doxepin	chloral hydrate				x
	doxepin	cimetidine		x		
	fluoxetine	phenhydramine				
	fluoxetine	Subhylate				
	fluoxetine	propanolol				x
	fluoxetine	propanolol				x
	fluoxetine	chloral hydrate				x
	doxepin	chloral hydrate				
	fluoxetine	chloral hydrate				
	doxepin	chloral hydrate				
	doxepin	chloral hydrate				

Re: U.S.D.C., S.D. Of
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TABLE 21

Dr. K. Rickels - Protocol 35
Reference Fluoxetine NDA 18-936: 1.52/082-063

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Heds
	fluoxetine QD	cimetidine, propantheline, chloral hydrate, chloral hydrate, chloral hydrate, chloral hydrate, chloral hydrate, diphenhydramine, flurazepam, propantheline	X	X	X
	fluoxetine BID	fluoxetine BID	X	X	X
	fluoxetine BID	chloral hydrate	X	X	X
	fluoxetine BID	chloral hydrate	X	X	X
	fluoxetine BID	chloral hydrate	X	X	X
	fluoxetine QD	chloral hydrate	X	X	X
	fluoxetine BID	diphenhydramine	X	X	X
	fluoxetine BID	flurazepam	X	X	X
	fluoxetine QD	flurazepam	X	X	X
	fluoxetine QD	flurazepam	X	X	X
	fluoxetine QD	flurazepam	X	X	X
	fluoxetine BID	flurazepam	X	X	X
	fluoxetine BID	flurazepam	X	X	X
	fluoxetine QD	cimetidine	X	X	X
	fluoxetine BID	flurazepam	X	X	X
	fluoxetine BID	chloral hydrate	X	X	X
	fluoxetine QD	chloral hydrate, hydroxyzine	X	X	X
	fluoxetine QD	chloral hydrate, hydroxyzine	X	X	X
			TOTAL	13	

TABLE 22

Protocol 35
Reference Fluoxetine NDA 18-936:1.53/079-080

Pt. No.	Study Drug	Concomitant Meds	Allowed Psych	Disallowed Psych	Other CNS Effect Meds
	fluoxetine QD	hydroxyzine	X	X	
	fluoxetine BID	cimetine	X	X	
	fluoxetine QD	chloral hydrate, nesperidone	X	X	
	fluoxetine QD	chloral hydrate, doxepin	X	X	
	fluoxetine BID	chloral hydrate	X	X	
	fluoxetine QD	chloral hydrate, clorazepate	X	X	
	fluoxetine BID	chloral hydrate, fluoxatam	X	X	
	fluoxetine BID	propantheline	X	X	
	fluoxetine QD	propantheline	X	X	
	fluoxetine BID	fiorinal, propantheline	X	X	
	fluoxetine QD	chloral hydrate	X	X	
	fluoxetine BID	chloral hydrate	X	X	
	fluoxetine QD	chloral hydrate, flurazepam	X	X	
	fluoxetine QD	chloral hydrate	X	X	
	fluoxetine BID	chloral hydrate, flurazepam	X	X	
	fluoxetine QD	chloral hydrate, flurazepam	X	X	
	fluoxetine BID	chloral hydrate	X	X	
	fluoxetine QD	diphenhydramine	X	X	
	fluoxetine BID	temazepam	X	X	
	Parafon Forte				
	fluoxetine QD	chloral hydrate	X	X	
	fluoxetine QD	chloral hydrate	X	X	
	fluoxetine BID	chloral hydrate, diphenhydramine	X	X	
TOTAL	18	4	7	7	