FDA ADVISORY PANEL

Zilver[®] PTX[®] Drug-Eluting Peripheral Stent

Circulatory Systems Device Panel Meeting



Introduction

Aaron Lottes, PhD

Lead Scientist for Zilver PTX

Director Regulatory Science PAD Therapies Cook Medical

Michael Dake, MD

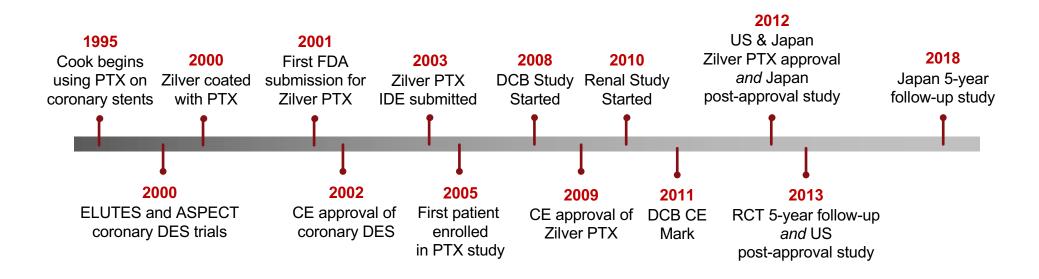
Global Principal Investigator for Zilver PTX

Senior Vice President of Health Sciences, Professor of Medical Imaging, Medicine, and Surgery, University of Arizona, Tucson/Phoenix

Paid consultant of Cook Medical



Cook Medical's 25 Year History with Paclitaxel



No mortality signal in 25 years, across multiple studies and devices



Overview

Purest Data on Paclitaxel

Because other paclitaxel devices were not yet approved, the Zilver PTX RCT and Japan PMS provide the best data available to look at paclitaxel treatment

Actual Treatment

Any analysis that does not consider known paclitaxel treatment is inappropriate for analyzing mortality and simply does not make sense

Patient Impact

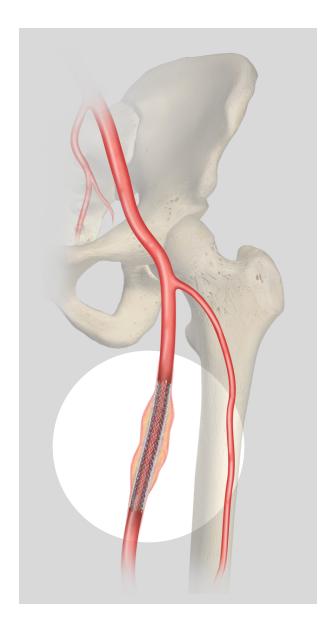
There is no mortality signal with Zilver PTX and the current situation is limiting patient access to the proven benefits of paclitaxel devices



Patient Benefit

Durable results through 5 years

- Greater than 40% reduction in restenosis
- Greater than 40% reduction in reinterventions
- Proven clinical benefit in real-world patients





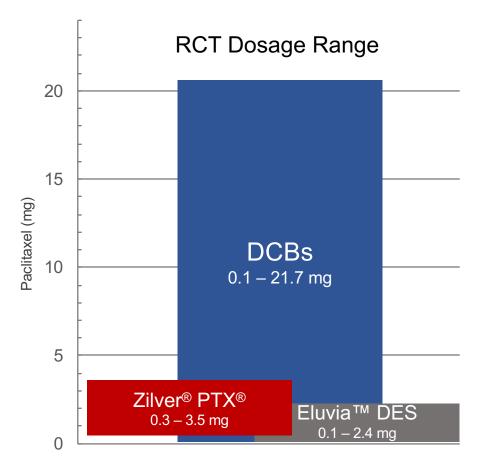
Dake MD, et al. Circulation. 2016;133:1472-1483 Yokoi H, et al. J Am Coll Cardiol Intv. 2016;9:271-277

ZILVER PTX Device Overview



Coating

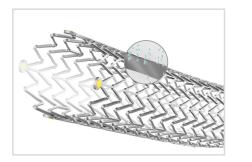
Low dose, amorphous coating with no polymer or excipient





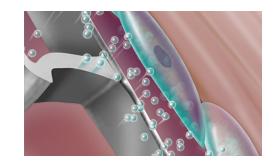
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ZILVER PTX Device Overview



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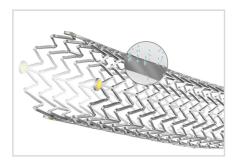


Local Drug Delivery

Short-term drug delivery, no long-term paclitaxel exposure, only BMS remains

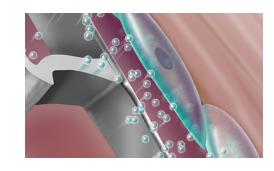


ZILVER PTX Device Overview



Coating

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Local Drug Delivery

Short-term drug delivery, no long-term paclitaxel exposure, only BMS remains



Long-term data

Only peripheral DES with long-term safety data



Study	Device	Follow-up	# of Patients
RCT	Zilver PTX	5 years	336
	PTA/BMS	5 years	143
Japan PMS	Zilver PTX	5 years	904
	BMS	3 years	190
EU BMS	BMS	5 years	110
US PAS	Zilver PTX	5 years ¹	200
Single-arm Study	Zilver PTX	2 years	787
French Reimbursement	Zilver PTX	2 years	119
China	Zilver PTX	1 year	178
REAL PTX	Zilver PTX	3 years	75
	DCB ²	3 years	75

¹ Ongoing ² 77.3% INPact, 21.3% Lutonix, 1.4% Other.



- >1,000 patients to support US approval
- >2,500 patients in global pre- and postmarket studies
- >300,000 stents to treat patients globally

Study	Device	Follow-up	# of Patients
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Large studies

- Long-term follow-up
- Concurrent comparator groups

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REAL PTX	Zilver PTX	2 1/0 0 70	75
	DCB ²	3 years	75

¹ Ongoing ² 77.3% INPact, 21.3% Lutonix, 1.4% Other.



- No exclusion criteria
- All treated patients enrolled
- Pure treatment comparison

Study	Device	Follow-up	# of Patients
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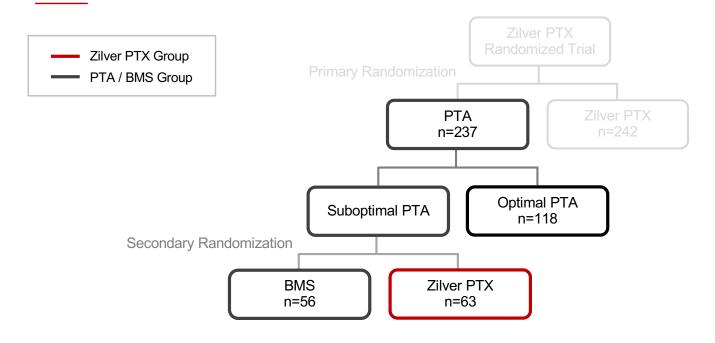
 Trial designed with multidisciplinary physician input and approval from FDA, PMDA, and BfArM

TRIAL DESIGN Primary Randomization



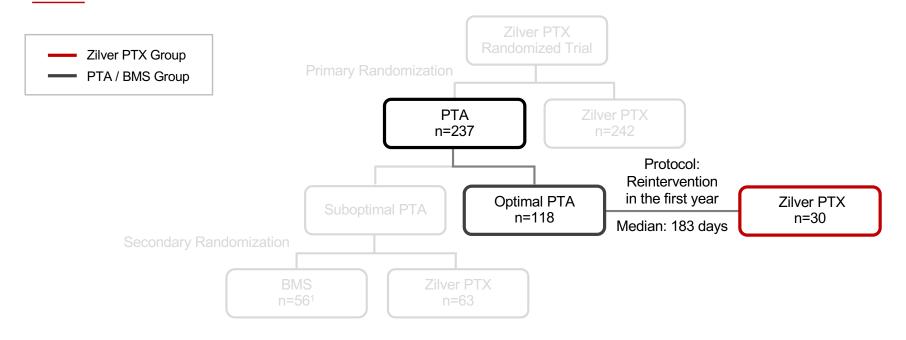


TRIAL DESIGN Secondary Randomization





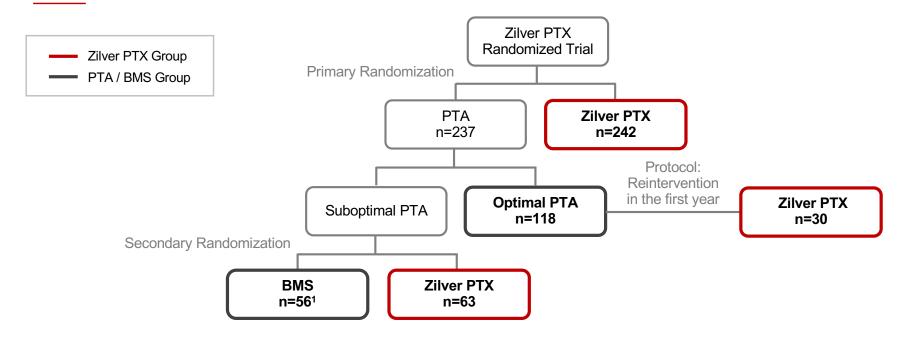
Early Crossover





¹ One BMS patient received Zilver PTX during reintervention within the first year.

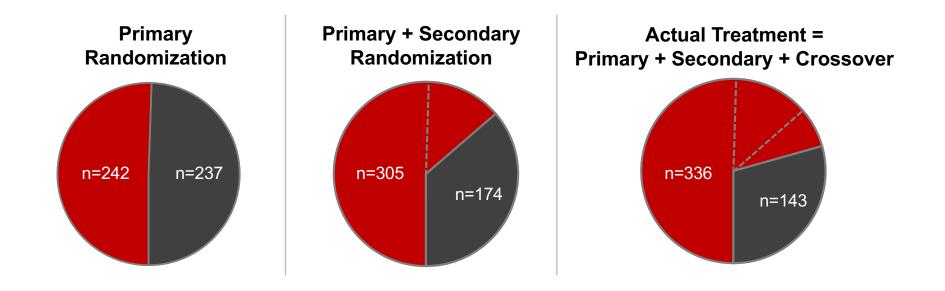
Actual Treatment



COOK*

¹ One BMS patient received Zilver PTX during reintervention within the first year.

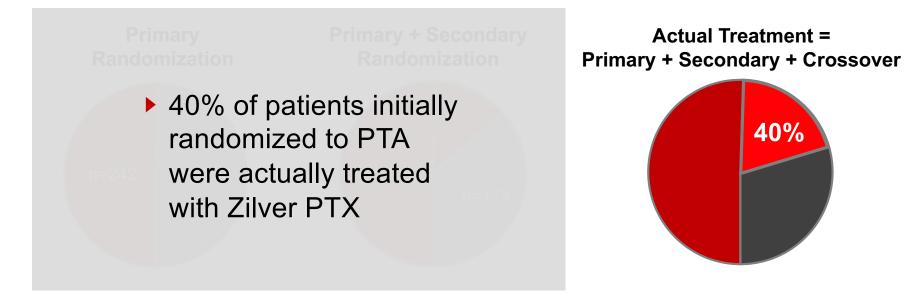
Treatment Results



40%

Treatment Results

Zilver PTX ■ PTA / BMS



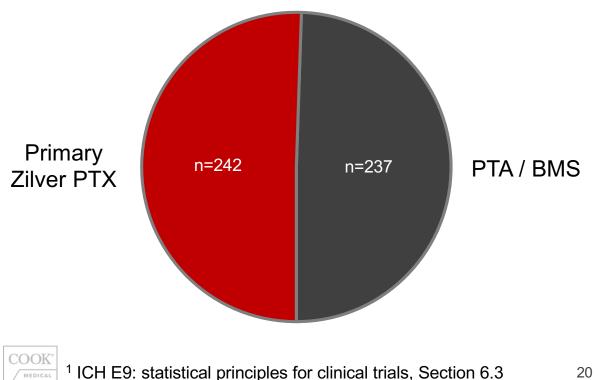


Results

Michael Dake, MD Global Principal Investigator for Zilver PTX

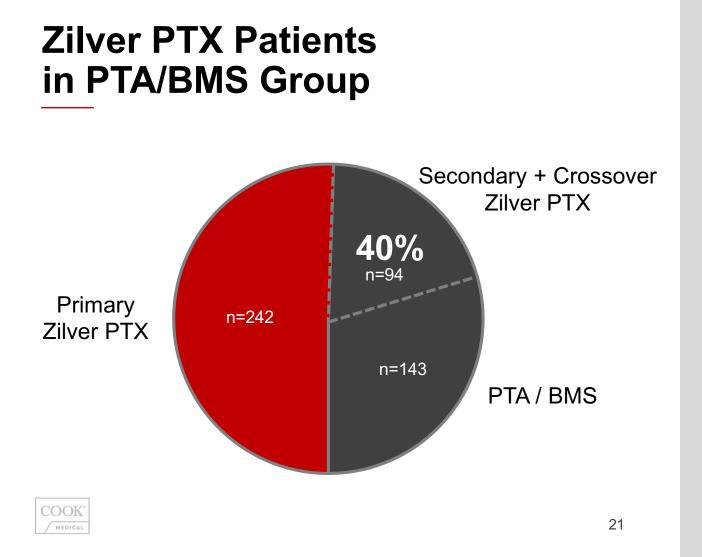




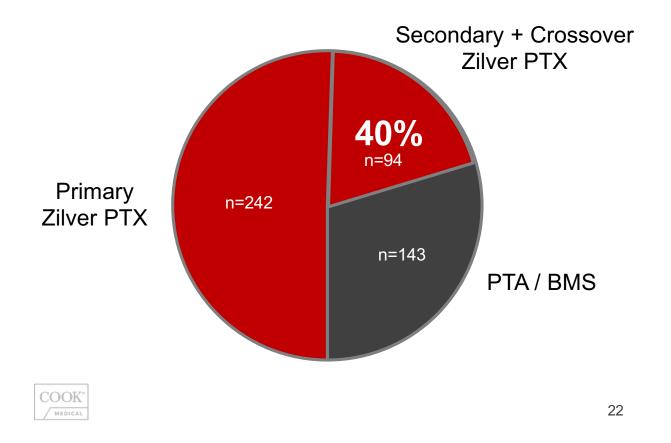


- Intent to treat is considered the standard for effectiveness
- Based on international standards, to evaluate safety we must analyze how patients were treated¹, not how they were randomized

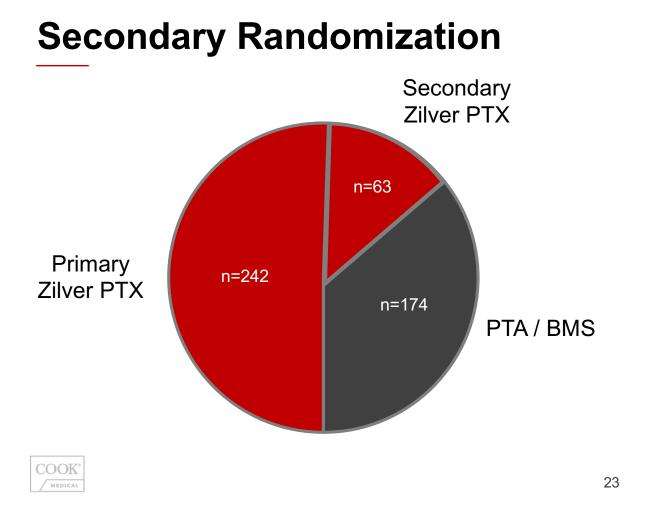
¹ ICH E9: statistical principles for clinical trials, Section 6.3

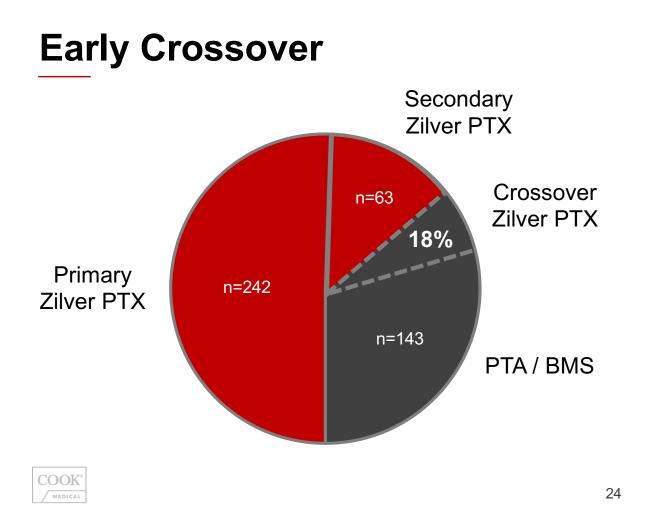


Zilver PTX Results Attributed to PTA/BMS

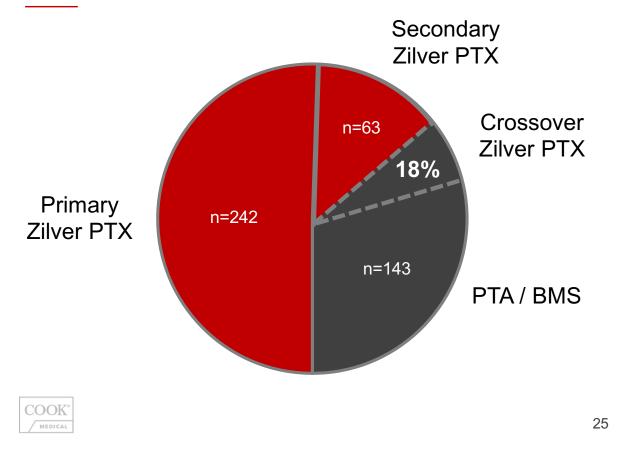


- 40% of the PTA/BMS group was treated with Zilver PTX
- Any analysis based on intent to treat is inappropriate for assessing paclitaxel mortality



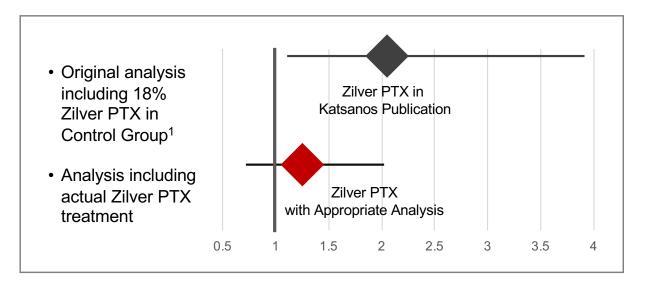


Zilver PTX Results Attributed to PTA/BMS



- Analyses by Katsanos, et al and FDA do not account for 18% of patients treated with Zilver PTX
- Zilver PTX mortality results were attributed to PTA/BMS group

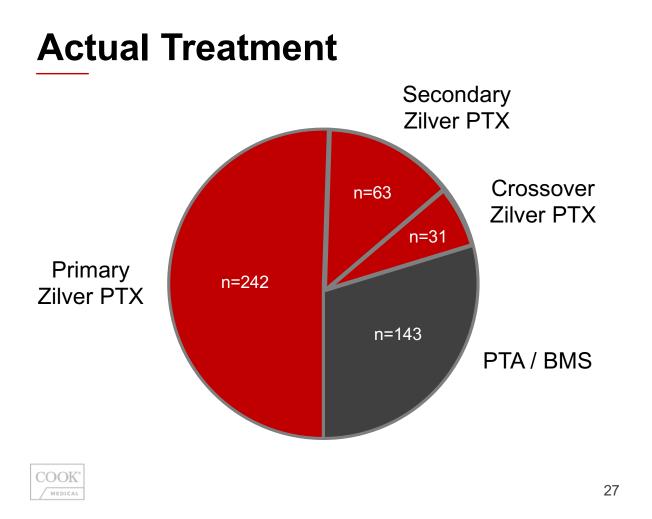
Paclitaxel Mortality Meta-Analysis



- Evaluating all patients treated with Zilver PTX changes the conclusion
- In addition, the result of the metaanalysis becomes non-significant

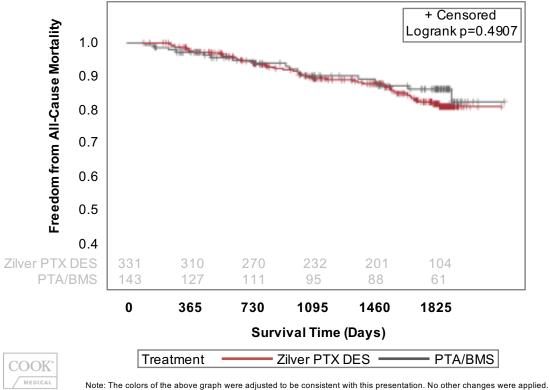


¹ Katsanos K, et al. J Am Heart Assoc. 2018;7:e011245 doi: 10.1161/JAHA.118.011245 26



- Actual treatment is an appropriate assessment of paclitaxel-related mortality
- FDA modified as-treated analysis and Cook analysis include actual treatment

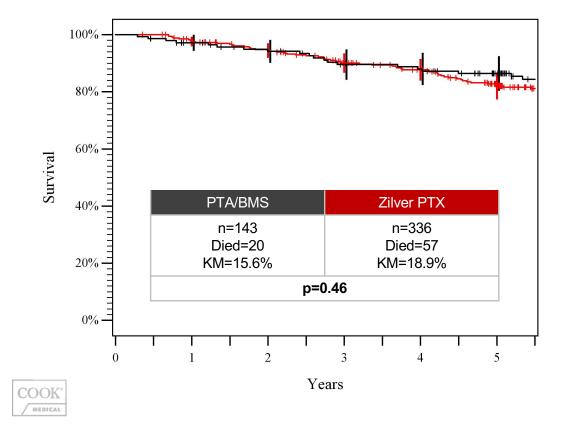
ZILVER PTX RCT FDA Analysis of Actual Treatment FDA Panel Pack (Appendix E)



All patients analyzed by actual treatment

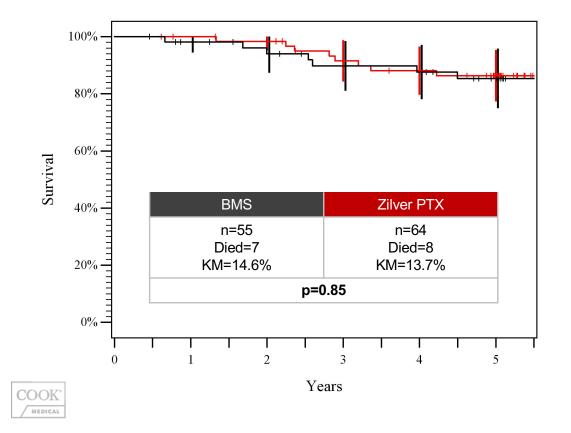
No mortality signal

Cook Analysis of Actual Treatment



- Includes new patient status for 92% of patients previously lost-to follow-up
- Added data confirmed no mortality signal

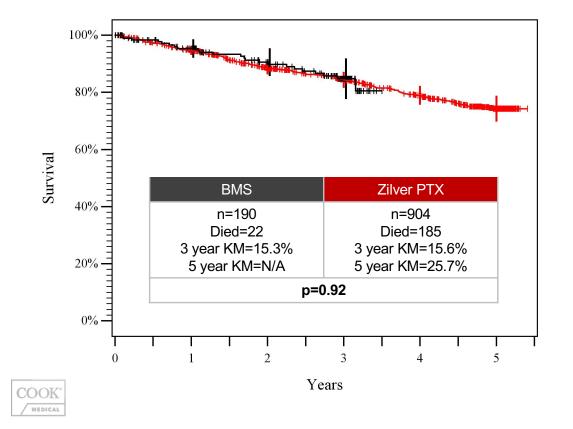
Randomized Comparison to BMS



 Head-to-head comparison of Zilver PTX to BMS

No mortality signal

Japan PMS: No Mortality Signal



- Large, real-world, post-market studies
- No increase in rate of mortality after 3 years
- No mortality signal

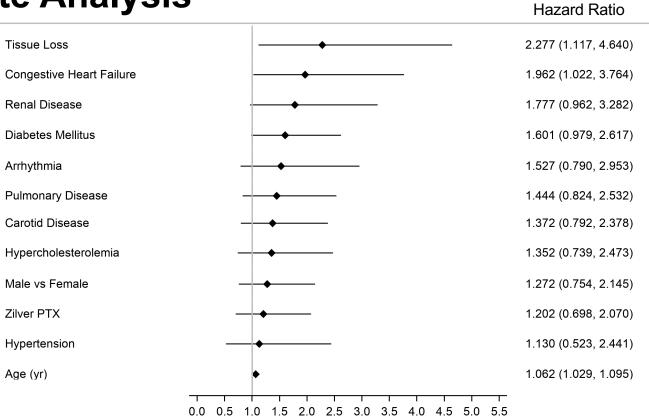
Covariate Analysis

- No mortality signal for Zilver PTX when evaluating actual treatment
- What factors were associated with mortality?



ZILVER PTX RCT

Covariate Analysis

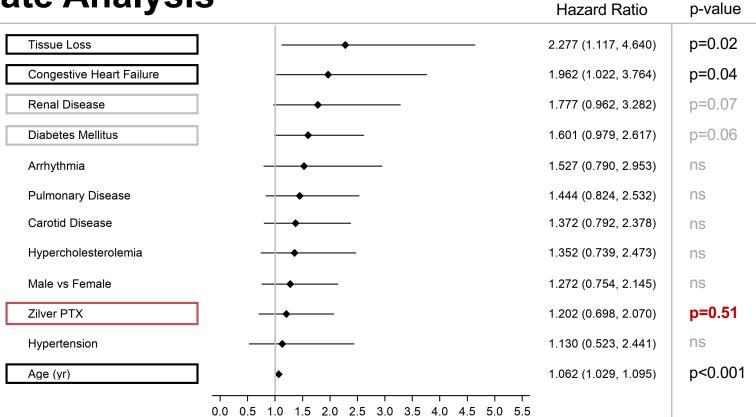




Additional non-significant factors included: smoking status, country, CLI/claudication, lesion length, previous MI, BMI

ZILVER PTX RCT

Covariate Analysis





Additional non-significant factors included: smoking status, country, CLI/claudication, lesion length, previous MI, BMI

ZILVER PTX RCT

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MEDICAL

Covariate Analysis

		Hazaro Ralio	p-value
Tissue Loss		2.277 (1.117, 4.640)	p=0.02
Congestive Heart Failure		1.962 (1.022, 3.764)	p=0.04
Renal Disease	Comorbidities com	mön ^{1,737} (0.962, 3.282)	p=0.07
Diabetes Mellitus	in PAD patients we	1 601 (0 979 2 617)	p=0.06
Arrhythmia		1.527 (0.790, 2.953)	ns
Pulmonary Disease	the significant pred	ICTO(TS 4, 2.532)	ns
Carotid Disease	of mortality	1.372 (0.792, 2.378)	ns
Hypercholesterolemia		1.352 (0.739, 2.473)	ns
Male vs Female	Zilver PTX not a	1.272 (0.754, 2.145)	ns
Zilver PTX		1.202 (0.698, 2.070)	p=0.51
Hypertension	predictor of mortali	ty .130 (0.523, 2.441)	ns
Age (yr)	•	1.062 (1.029, 1.095)	p<0.001
	0.0 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 5.5		

Additional non-significant factors included: smoking status, country, CLI/claudication, lesion length, previous MI, BMI

p-value

Hazard Ratio

Covariate Analysis

CLI vs Claudicant 2.981 (2.205, 4.030) **Renal Failure** 2.471 (1.838, 3.323) 1.833 (1.264, 2.658) Male vs Female 1.284 (0.938, 1.758) **Diabetes Mellitus** Carotid Disease 1.223 (0.907, 1.649) 1.154 (0.720, 1.850) Zilver PTX 1.045 (1.026, 1.064) Age (yr) Pulmonary Disease 1.020 (0.594, 1.752) Hypertension 0.858 (0.587, 1.254) Hypercholesterolemia 0.641 (0.473, 0.870) 0.0 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0 5.5



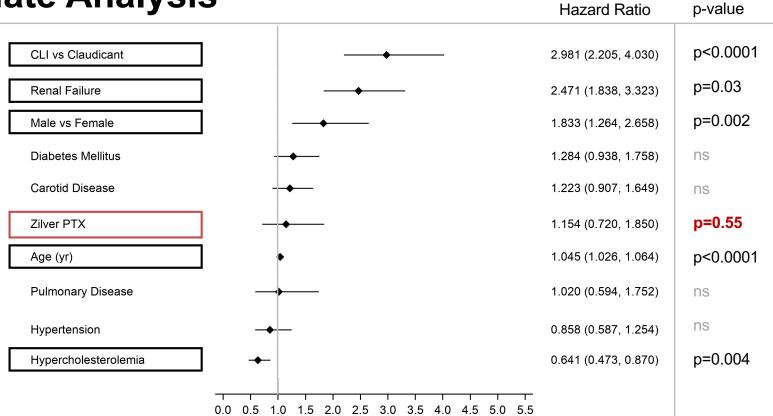
Additional non-significant factors included: smoking status, lesion length

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Hazard Ratio

Covariate Analysis





Additional non-significant factors included: smoking status, lesion length

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Covariate Analysis

		Tiazaru Natio	p-value
CLI vs Claudicant		2.981 (2.205, 4.030)	p<0.0001
Renal Failure		2.471 (1.838, 3.323)	p=0.03
Male vs Female	Comorbidities cor	nmon 1.264, 2.658)	p=0.002
Diabetes Mellitus	in PAD patients w	/ere 284 (0.938, 1.758)	ns
Carotid Disease	the significant pre	dictors7, 1.649)	ns
Zilver PTX	of mortality	1.154 (0.720, 1.850)	p=0.55
Age (yr)	•	1.045 (1.026, 1.064)	p<0.0001
Pulmonary Disease	Zilver PTX not a	1.020 (0.594, 1.752)	ns
Hypertension	predictor of morta	1:+ ,0,858 (0.587, 1.254)	ns
Hypercholesterolemia		0.641 (0.473, 0.870)	p=0.004
	0.0 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0	5.5	



Additional non-significant factors included: smoking status, lesion length

p-value

Hazard Ratio

Covariate Analysis: Dose

- Paclitaxel analyzed by dose (mg) per patient
- Significant predictors same as treatment arm analysis
 - RCT: Age, tissue loss, CHF
 - Japan: CLI, age, gender, renal, hypercholesterolemia

Study	Hazard Ratio	p-value
RCT	0.968 (0.659, 1.422)	0.87
Japan	1.162 (0.961, 1.404)	0.13



Covariate Analysis: Dose

- Paclitaxel analyzed by dose (mg) per patient
- Significant predictors same as treatment arm analysis
 - RCT: Age, tissue loss, CHF
 - Japan: CLI, age, gender, renal, hypercholesterolemia

Study Hazard Ratio	p-value
Paclitaxel dose	0.87
not a predictor of mortality	
Japan (0.961, 1.404)	0.13



Conclusion

Analysis must be based on actual treatment

Protocol defined secondary randomization and crossover must not be ignored

No mortality signal with Zilver PTX

When data are appropriately analyzed

Patient care is being negatively impacted

