

Janet Woodcock, Acting Commissioner, FDA
Patrizia Cavazzoni, Acting Director, CDER, FDA
Peter Stein, Director, Office of New Drugs, CDER, FDA
Billy Dunn, Director, Office of Neuroscience, CDER, FDA
Eric Bastings, Acting Deputy Director, Office of Neuroscience & Director, Division of Neurology I, CDER, FDA
Teresa Buracchio, MD, FDA

Warren Huff, Chief Executive Officer, Reata Pharmaceuticals
Colin Meyer, Chief Research and Development Officer, Reata Pharmaceuticals
Reata Pharmaceuticals, Board of Directors, Martin Edwards, Warren Huff, William McClellan Jr, R. Kent
McGaughy Jr, Jack Nielsen, William Rose

February 5, 2021

Dear Ladies and Gentlemen,

We the Friedrich's Ataxia Research Alliance (FARA), with the support of 74,070 Friedrich's Ataxia (FA) community members, 51 expert clinicians and 13 advocacy-organization partners are submitting this petition requesting that Reata submit a New Drug Application (NDA) on an urgent basis and FDA consider approval of this NDA for omaveloxolone (omav) in Friedrich Ataxia (FA) based on the existing evidence from clinical trials.

There has been strong congressional support to move toward flexibility and acceleration of traditional regulatory standards and timelines and include the patient voice and experiences in the review and approval of new drugs. The legal framework is in place to support approval based on one adequate, well-controlled trial and confirmatory evidence when specific criteria can be met. Such criteria include a serious burden of disease, significant unmet need, trials being difficult to design and execute due to the rare nature of the disease, or the availability of substantial natural history data or other sources of confirmatory evidence. All of these criteria are met in this case, and we have an adequate and well-controlled trial with a statistically significant placebo-corrected functional benefit in the primary outcome (Modified Friedrich Ataxia Rating Scale at 48 weeks; n=103; p=0.014) of the MOXIe trial.

We are reaching out to you, now, as we strongly believe that decisions made in relation to omav have much broader implications for FA and other rare diseases as these decisions will set a precedent for therapies to follow. In FA, there is a pipeline with multiple therapeutic approaches in clinical development. Because FA is a rare disease, there are a limited number of patients we can enroll into clinical trials and a limited number of clinical centers with expertise in the disease, making it impossible to conduct multiple, large, simultaneous efficacy studies. With no approved treatments for FA, requiring multiple positive efficacy studies adds years to the approval process leading to greater losses and burden for the FA patient community. This, of course, is especially devastating when, as you can see in the comments below and attached, the FA patient and clinical communities believe strongly that there are positive results from a single adequate, well-controlled study and confirmatory evidence that merit regulatory consideration and approval.

“Based on the data available from the trials for omaveloxolone, I would like both myself and my fellow FAers to have access to this drug... If another trial is needed to approve this drug, it will take multiple years to get approved. This is a problem for FA patients because a few years of progression means major life-changing losses in function...” -29 year old living with FA

“Yes, even though there may be some unknowns involved with taking a newly developed drug, without it, the outcome is certain and I really want to be there for milestones in my children’s lives: graduations, weddings, grandkids, etc. and if this drug can offer more time then I feel it’s availability should be expedited.” -47 year old living with FA

“Asking for another phase of the clinical trial is asking for people to lose a lot. What the FA community people will lose: their ability to walk, ... speech impairments, inability to perform daily activities independently.... There aren't enough people with this disease to get the power you want statistically. Many people can't even join most studies because their disease progression limits them from joining. Help this community.” -Parent/family member of 15 year old living with FA

In line with the goals of the 21st Century Cures Act, we are bringing to you the patients’ experiences and their preferences, specifically related to their urgent desire to see omav approved for FA. The FA community has reviewed the results of the omav clinical trials, and they feel there is adequate safety and efficacy information available to them and their physicians to decide for themselves to take this medication.

FARA has facilitated numerous educational opportunities for the FA community to learn about omav. During the past year, as results of a pivotal trial were released and published, we have shared those results and hosted webinars to review the data with the community. Based on the favorable safety profile and positive efficacy data, the community urgently needs and wants access to omav and has been incredibly concerned and frustrated by FDA’s advice to Reata to conduct additional efficacy studies. These additional efficacy studies would take years to conduct which, frankly, the individuals with FA don’t have. *Time is neurons!*

“Friedreich's Ataxia patients and their families cannot afford to wait 3 years for another clinical trial. Friedreich's patients lose something every day, every week and every month. Time is a luxury we simply do not have. - Parent of 22 year old living with FA:

“I am hoping the FDA will approve the drug without a second clinical trial. The FA Community has a huge urgency for this drug, because every day we go without any type of treatment is a day that we progress even more, becoming trapped inside a body that does not do anything that it is instructed to do.” -44 year old living with FA

“Based on the data available today, I think everyone with FA should be given the opportunity to take this drug. I know from my experience living with FA that my symptoms will continue to progress a lot in the time that it would take to complete another trial. We should all have the opportunity to treat FA as soon as possible. Time is very important.” -36 year old living with FA

FARA prepared the enclosed FA Community Response letter as an exigent request for the FDA and Reata Pharmaceuticals to work together to provide access to omav for people with FA as soon as possible. We invited

the FA community to sign-on to this letter from Jan 5th-20th, 2021 and, as a result, **submit to you the 74,070 signatures of which 35,382 are from US citizens representing all 50 states**. We invited people to also share with us their affiliation to the FA community, their comments on the data currently available on safety and efficacy of omav, if they or their family member would want the option of taking the drug and/or, if they participated in the omav trials -- MOXIe Part 1, Part 2 or Open Label Extension studies -- to share their experience or observations.

1,924 individuals living with FA and 13,899 parents and family members have signed and 7,503 provided comments that are all enclosed for your review and consideration. There are direct experience comments from 71 individuals with FA who reported having participated in the omav trials and comments from 148 parents and family members who shared their experience and observations of the effects of omav on FA symptoms.

There is remarkable consistency in the comments provided on the impact of omav in improving symptoms of FA and how that translates to improvements in quality of life. Individuals report improvements in hand/arm coordination, improved stability and gait quality, decreased falls, improved speech, decreased or no progression, and diminished fatigue or more stamina to do activities in a day.

"...this drug has given me the ability to work nearly full time. It helps my speech, my handwriting, and I don't feel as though my walking has gotten worse since I started the drug. This drug has worked as an antidepressant and has given me hope for the future." -27 year old living with FA

"... At first I did not notice any immediate affects but over time I became aware that I did not feel any new symptoms of an individual living with Friedreich's Ataxia. My body does not feel as if it is progressing anymore. This positive experience is a direct response of being able to take Omav!" -25 year old living with FA

"...my son would absolutely want the option to stay on the drug he has experienced true benefit from the drug. His degeneration has plateaued. His speech is clearer. Use of his hands has improved. He is not in a wheelchair full time. He can still get around with a walker and he is stronger. Fatigue is less. When you live a life waiting each day for a disease to rob you of your independence it is hard to reconcile that a drug that is helping you will be taken away... He is able to pick up a glass, use utensils, wash dishes, shower, the list is endless... Participating in a clinical trial is grueling work for FA patients, and now with covid, it is frightening. ... countless trips to hospitals, countless swabs, countless bloodwork, and just when there is a light at the end of the tunnel the system is about to let him down again. There must be some compassion in the system..." - Parent of 27 year old living with FA

The clinical meaningfulness of the omav results are not only obvious to those who participated in the trials but also to the thousands of individuals and families who have not yet had the opportunity to take the drug but who are anxiously awaiting that opportunity.

"The existing evidence available supports both safety and effectiveness and that is enough for me to say I would like to have this available for our FA community. Time is of the essence here. At my diagnosis I was still able to run, play volleyball, swim, be a kid. Those abilities were rapidly taken by FA and now at 26 I need assistance with every daily task, have both vision and hearing impairments and the disease still

continues on. Please approve this drug based on the existing data and help our community now. -26 year old living with FA

"I would love the opportunity to try Omav and slow down my progression. I have lost so much in the last 2 years, I have lost my ability to walk, stand, write, my speech and swallowing reflexes have been affected, my heart now has damage. I can no longer stand flat on my feet." -18 year old living with FA

"Please understand this: my kids are running out of time. We can't stand by and watch and wait for another full clinical trial to occur; by the time that finishes, FA will have stolen so much more from both of them. Omav can pause this. Omav can buy us time. We have studied the data, we know this disease, and say with confidence: Omav is safe. Omav is effective. Right now, omav is all we have in this fight. We want omav, we need omav, and without omaveloxolone, we will continue to watch these amazing kids, day by day, lose their fight against Friedreich's Ataxia." -Parent of 14 and 13 year olds living with FA

The voice of this parent of a 19 year old individual living with FA sums it up well, "[We] respectfully and urgently request Reata to submit a New Drug Application (NDA) on an urgent basis and the FDA to exercise the flexibility granted by law and contained in FDA guidance in considering approval of an NDA for Omaveloxolone in FA based on the existing evidence from clinical trials... Since he started taking Omav, the FA progression my son has experienced has slowed. He has less fatigue and more energy to maintain some of his independence with daily activities...Omav seems to be slowing his losses and increasing his level of activity and hope for the future. This is the first time that the FA community has received any hope for abatement of the symptoms of this terrible disease. PLEASE move forward with the application and approval process for this drug..."

We are grateful for the opportunity to bring you the voice and direct experiences of the FA Community. We believe the huge response to this Call to Action speaks directly to the importance of these issues to the FA community as well as those supporting them or living with related conditions.

We hope you will take the time to review the full petition and especially the comments. We would welcome the opportunity to meet with you to discuss how this petition can inform your decisions related to omav in FA as well as drug development in FA more broadly. We would eagerly welcome any follow-up correspondence from you and ask that you send it to Jennifer Farmer, CEO, FARA, jen.farmer@curefa.org

Respectfully submitted,



Ronald J. Bartek
Co-Founder/Founding President, FARA



Jennifer Farmer, MS
CEO, FARA

Cc:

Julia Tierney, Chief of Staff to Acting Commissioner, FDA

Andrea Furia-Helms, Director, Patient Affairs Staff, FDA

Robyn Bent, Director, Patient-Focused Drug Development Staff, CDER, FDA