Taking CAR T Cells From First-in-man Trials To Marketing Authorisation – The View From A Pharmaceutical Developer



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## Design Characteristics To Define A Pharmaceutical Product Profile

- Target
- Mechanism of Action
- Pharmaceutical properties
  - Specificity
  - Potency/Affinity
- Dose selection
  - Starting dose
  - Optimal/Maximal tolerable dose
- Schedule/Duration
- Risk benefit profile
  - Clinical activity in a defined population
  - Adverse events
- Regulatory comparators for unmet medical need
- Commercial competition and potential differentiation

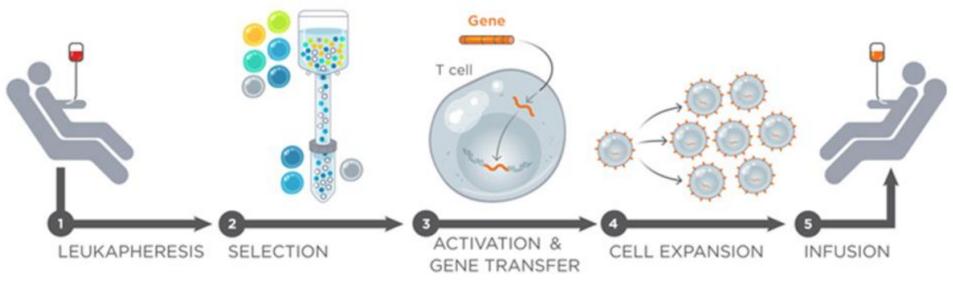
#### Taking CAR T Cells From First-in-man Trials To Marketing Authorisation – The View From A Pharmaceutical Developer

- Chimeric Antigen Receptor modified autologous T cells directed against CD19 have the potential to provide cure.
- The curative potential of CD19 directed CAR T cells is balanced by considerable safety risks that continue to be defined and addressed.
- The substantial clinical activity and considerable safety risks provided by CD19 directed CAR T cells and rapid advances in clinical development by multiple sponsors challenge the regulatory status quo.
- Despite some convergence in observed biology, each construct, manufacturing process, clinical protocol, disease state are different
- Rapid scientific advances in altering the design and composition of CAR T therapies pose substantial regulatory and development challenges
- Iterative improvements in CAR T design, manufacturing, and therapeutic management are anticipated but the regulatory path to allow for innovation may require legislative changes



### CD19 CART Products JCAR015 and JCAR017 Manufacturing Process Flow

## Multiple, complex variables for CMC complicate development



PBMCs obtained from patient via standard leukapheresis collection T cells isolated,

JCAR015: CD4+/CD8+ together

JCAR017: CD4+ & CD8+ separately

T cells activated, and transduced with viral vector

JCAR015: CAR gene via gammaretrovirus

JCAR017: CAR/EGFRt genes via lentivirus

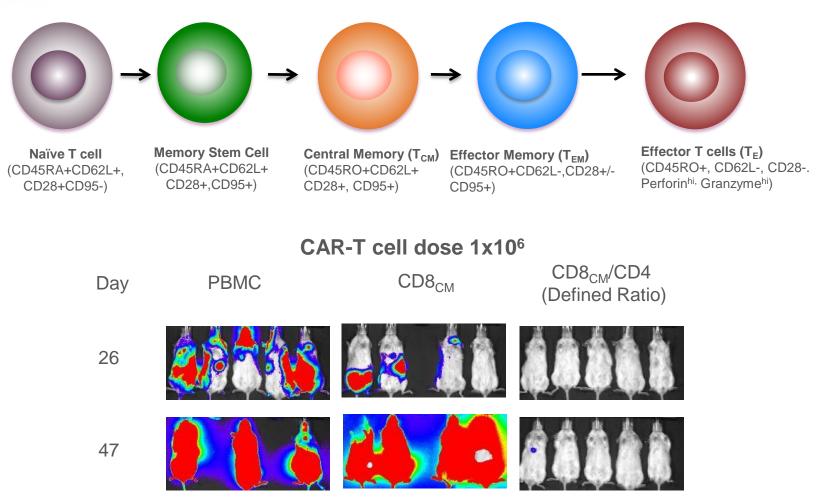
CAR T cells expanded and conditioned to therapeutic dose, formulated and <u>cryopreserved</u>

QC/QA release

CAR T cells infused into patient after lymphodepleting chemotherapy

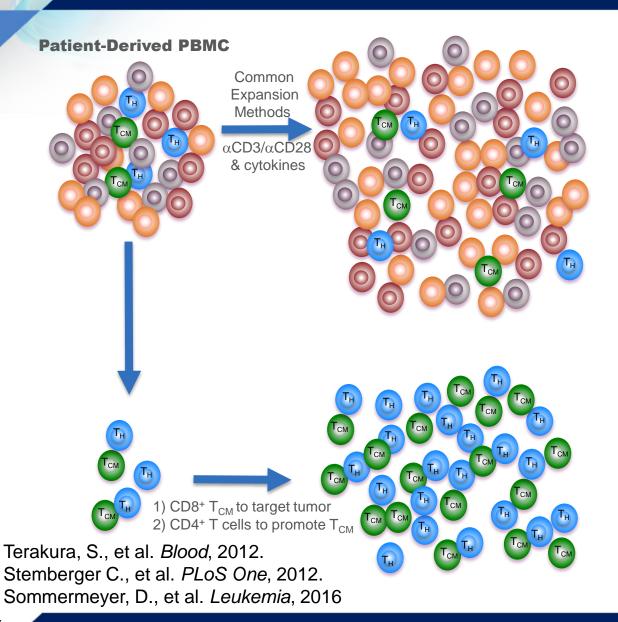
#### Defined Composition for Improved Potency Activity of T cells in Mice with Human Lymphoma Xenografts

#### **CD8 and CD4 T Cell Subsets**



Sommermeyer, D., et al. Leukemia, 2016.

## Optimizing T cell composition The right T cell populations matter



#### JCAR014/JCAR015/JCAR017

#### **Provides:**

- Defined cell products
- Higher % CAR T cells
- Permits lower cell doses
- May improve efficacy
- May have lower toxicity



### Efficacy and Safety Data Available Academic Data in R/R ALL

Product Candidate	JCAR014	JCAR015	JCAR017
Trial	r/r Adult ALL N = 36 Evaluable = 34 (1)	r/r Adult ALL N = 51 Response Evaluable = 50 Toxicity Evaluable = 51 (2)	r/r Pediatric ALL N = 37 Evaluable = 33 (3)
Complete Response / Remission	100%	82%	91%
Complete Molecular Remission	94%	67%	91%
Severe Cytokine Release Syndrome	21%	28%	27%
Severe Neurotoxicity	26%	29%	18%

(1) Turtle, Abstract 102, ASCO 2016; (2) Park, Abstract 7003, ASCO 2016; (3) Gardner, Abstract 3048, ASCO 2016

Median follow-up: 6 months (1-45 months) Cumulative follow-up: 20/45 (44%) patients with  $\geq$  6 months of follow up 9/45 (20%) patients with  $\geq$  1 year of follow up



#### Cytokine Release Syndrome & Neurological Toxicities By Baseline Disease Burden: MSKCC R/R Adult ALL

	Morphologic Disease (N=31)	Minimal Disease (N=20)	
Severe CRS	13 (42%)	1 (5%)	
Grade 3/4 Neuro Toxicities	11 (35%)	4 (20%)	
Severe CRS <u>&amp;</u> Gr 3/4 Neuro Tox	7 (23%)	1 (5%)	
Severe CRS <u>or</u> Gr 3/4 Neuro Tox	17 (55%)	4 (20%)	
Grade 5 Toxicity	4 (13%)¶		
Management			
Treated with Tocilizumab	12 (39%)	0 (0%)	
Treated with Steroids	11 (35%)	1 (5%)	
Treated with Toci & Steroids	10 (32%)	0 (0%)	

<sup>¶</sup> All pts received a higher dose (3x10<sup>6</sup> CAR T cells/kg): 2 pts with sepsis/multi-organ failure; 1 pt had seizure, but unknown cause of death

• Use of Tocilizumab and/or Steroids had no impact on RFS or OS.

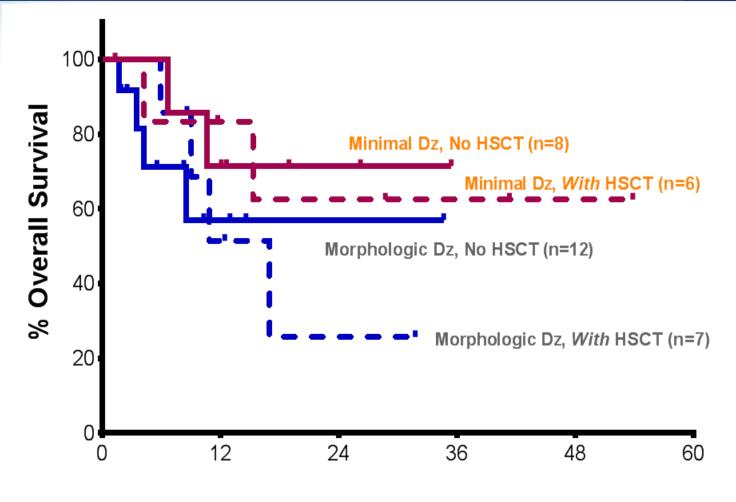
Park et al, ASCO 2016: 7003



	Morphologic Disease N=30 (%)	Minimal Disease N=20 (%)
CR Rate	23 (77%) [58 – 90]	18 (90%) [68 – 99]
MRD negative CR Rate*	19/21 (90%) [70 – 99]	14/18 (78%) [52 – 94]
Time to CR, Mean (SD)	20 days (9)	25 days (9)

\*MRD assessment was not available in 2 patients.

After toxicity observed at  $3 \times 10^6$  CAR T cells/kg; patients with morphologic disease dosed at  $1 \times 10^6$  CAR T cells/kg; Minimal Disease patients remain dosed at  $3 \times 10^6$  CAR T cells/kg Dose:toxicity relationship with disease burden as a variable demonstrated Overall Survival by baseline disease burden: MRD-CR patients by post CAR-T HSCT



Time Since CAR T Cell Infusion (Months)



#### No Dose: Toxicity Relationship Observed CTL019 in CLL

Response	High Dose	Low Dose	Total	
CRS*	6 (55%)	7 (54%)	13 (54%)	
No CRS	5 (45%)	6 (46%)	11 (46%)	
Total	11	13	24 (p=1.0)	
			UNIVERSITY PENNSYLVAN Abramson Cancer	OF MA r Cente

Presented By David Porter at 2016 ASCO Annual Meeting; Abstract 3009



### No Dose:Response Relationship Observed? CTL019 in CLL

Response*	High Dose	Low Dose	Total
CR/PR	6	4	10
	(54%)	(31%)	(42%)
No response	5	9	14
	(46%)	(69%)	(58%)
Total	11	13	24 (p=0.41)

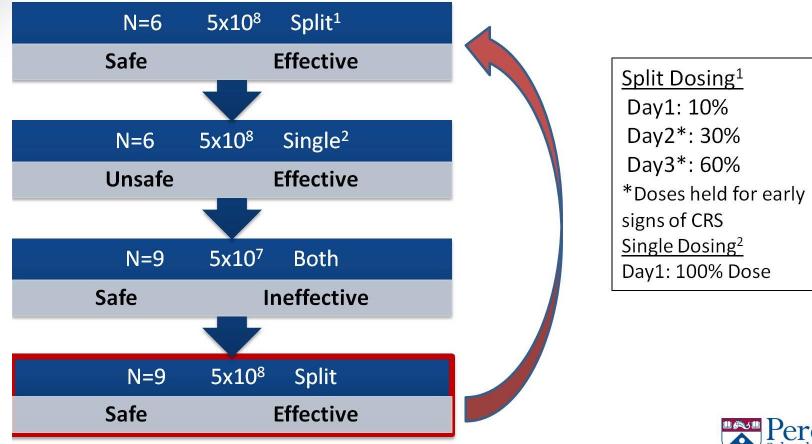
ASCO 2016



Presented By David Porter at 2016 ASCO Annual Meeting

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#### Dose:Response and Dose:Toxicity in Adult ALL CTL019





Presented By Noelle Frey at 2016 ASCO Annual Meeting; Abstract 7002

4192 Transcend NHL 001: Immunotherapy with the CD19-Directed CAR T-Cell Product JCAR017 Results in High Complete Response Rates in Relapsed or Refractory B-Cell Non-Hodgkin Lymphoma

Jeremy S. Abramson, MD<sup>1</sup>, Lia Palomba, MD<sup>2</sup>, Leo I Gordon, MD<sup>3</sup>, Matthew Lunning, DO<sup>4</sup>, Jon Arnason, MD<sup>5</sup>, Andres Forero–Torres, MD<sup>6</sup>, Tina M. Albertson, MD, PhD<sup>7</sup>, Victoria Shaw Exton<sup>7\*</sup>, Claire Sutherland, PhD<sup>7\*</sup>, Benhuai Xie, PhD<sup>7\*</sup>, Susan Snodgrass, MD<sup>7</sup> and Tanya Siddiqi,

- No minimum absolute lymphocyte count (ALC) requirement for apheresis and no test expansion required.
- Lymphodepletion (fludarabine 30 mg/m<sup>2</sup> and cyclophosphamide 300 mg/m<sup>2</sup> daily for 3 days) and JCAR017 given 2-7 days post-lymphodepletion at a starting dose of 5 x 10<sup>7</sup> CAR<sup>+</sup> T cells (DL1).
- Single-dose and two-dose schedules are being evaluated.
- 13 patients treated with JCAR017 with relapsed/refractory diffuse large B-cell lymphoma,
- 2 or 14% experienced severe neurotoxicity both of which resolved
- No patients experienced severe cytokine release syndrome.
- In 11 patients available for efficacy, the overall response rate was 82% with a complete response rate of 73%.

(ClinicalTrials.gov Identifier: NCT02631044)

ASH Presentation December 5, 2016

#### Development Parameters To Be Defined Unique Challenges of Individual Living Cellular Products













#### Manufacturing Steps Are Complex

Cell Yield

- Viability
- Cell Selection
- Activation
- Transduction
- Expansion
- Process qualification
- Formulation/fill/cryopreservation
- Control of Materials:
  - Raw materials
  - Consumables
  - Biologic raw materials
  - Media/buffers/Virus

### How Are Autologous CAR T Cells Different From Other Pharmaceutical Products?

- This is an individual product
- Manufacturing takes time; Release of product takes time
- This is a living drug; dose infused is a starting point
  - Expansion and durability may not be fully proportional to infused dose
  - Limited dosing expected (1-2 doses for potential cure)
  - In vivo rate, peak, and persistent expansion likely more important that infused dose
- Variability rather than consistency in biological behavior following infused dose is anticipated
- Management of adverse events by corticosteroids may alter PK of CAR T cells
- Rapidity and extent of CAR T cell expansion may be related to accessible target and tumor burden
- Long term follow up and monitoring are required due to safety concerns related to viral transduction
- Manufacturing costs are high; potential impact of manufacturing errors/failure is extremely high

- Infused cell dose too low
- Viability of cells too low
- Insufficient in vivo expansion
  - Physiologic milieu at time of infusion not sufficiently hospitable for expansion or durability (lymphodepletion)
  - Target is not accessible
  - Target is absent (antigen escape)
  - Anti CAR T immune response (B or T cell mediated)
  - Blunting of T-cell activity by tumor microenvironment, e.g. immune checkpoint activation

• Apheresis material

poene

- Challenges of a smaller blood volume for pediatric patients
- Processing of material: PBMC or T cell Selection
  - Undefined or defined cell ratio CD4:CD8
- Transduction method
  - Gamma retrovirus
  - Lentivirus
  - Transposons
  - Variable frequency and insertion sites
- Murine or human binders
- Costimulation
  - CD28
  - 4-1BB
  - Dual
  - Side CARs
- Single or multiple antigen recognition



# Protocol

- Costimulatory domain
- Starting Material
- Viability

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Quality

- Cell Dose
- Dose Fraction
- Lymphodepletion

# Patient

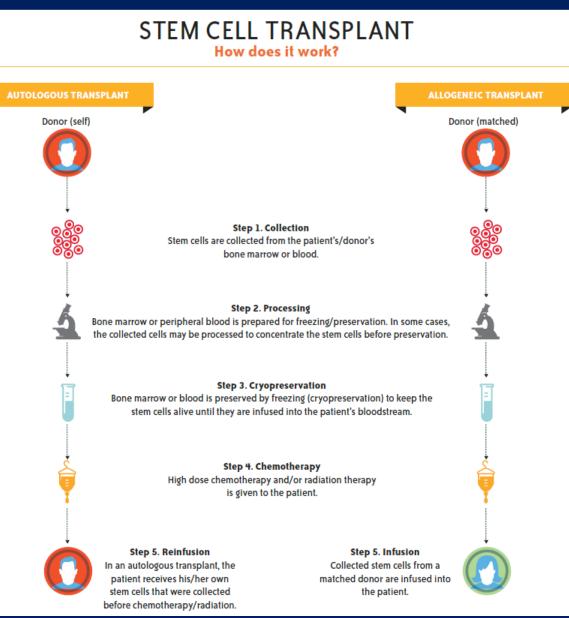
- Disease Burden
- Target accessibility
- Age
- Biologic variables



- Individual country GMO rules, sometimes at the local level as well as the state or national level, pose a barrier to rapid start of clinical trials in Europe
- Voluntary Harmonisation Procedure has not been successfully adapted to handle the different local and national standards



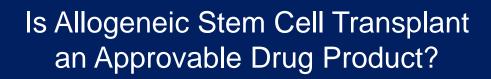
#### Hematopoietic Stem Cell Transplant Is the Comparable Clinically Relevant Technology for CAR T Cell Therapy



#### 23



- Academically driven development without centralized manufacturing
- Evolved to "best curative option" for many hematologic cancers including relapsed/refractory adult acute lymphoblastic leukemia
- Standard of care in physiologically and economically capable patients for relapsed aggressive large B cell Non-Hodgkin's lymphoma
- Lack of standardization across centers or across treatment protocols over decades
- Multiple variables in clinical protocols/clinical treatment



- Donor variability and type
  - Identical twin
  - HLA matched sibling
  - Haploidentical family donor
  - Matched unrelated donor; variable degrees of HLA mismatch
  - Umbilical cord blood
  - Bone marrow or peripheral blood stem cells
- Cell number from starting material with wide variability in dose
- Processing of product non-standardized
  - Unmanipulated
  - T cell depleted
- Variable patient diagnosis and prior treatments
- Variable cytoreductive and lymphodepletion conditioning regimens
- Variable graft vs host disease prophylaxis
- Variable supportive care and infection prophylaxis Would allogeneic HSCT have advanced to its current status if subjected to drug regulations?



- How optimized should the CD19 CART product be before such a study is conducted?
- How will the "transplant" be standardized as the control arm?
- How many products could be tested in such a design?

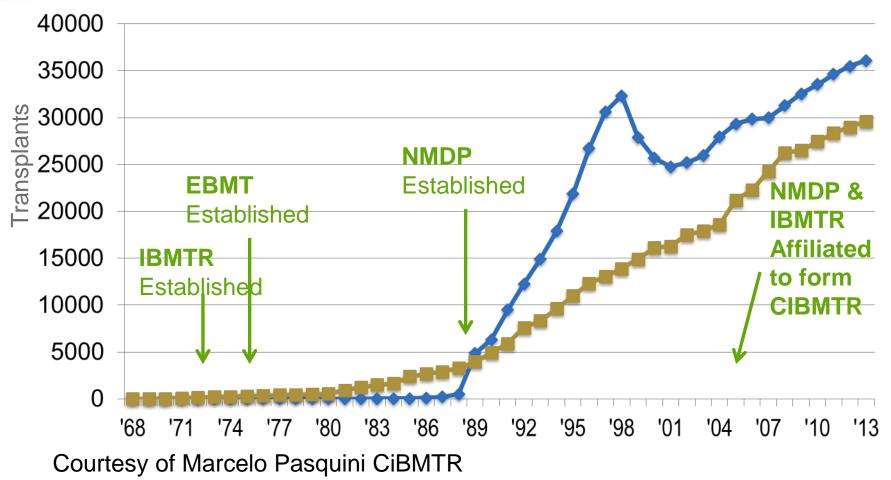


- Due to the use of viral vectors, long term safety monitoring required for clinical trial administered product as well as commercial product
- Can ongoing registry data be used to support "full approval" without a prospective randomized trial?
- Can EMA work with Sponsors, EBMT, CIBMTR, FDA to define a uniform data set and format to optimize this process?
- Can Registry and real world data provide another route to assess relative risk/benefit and value of CAR T therapies compared to each other and to other available therapies?

# CIBMTR Has Established HSCT Data Collection and Sharing

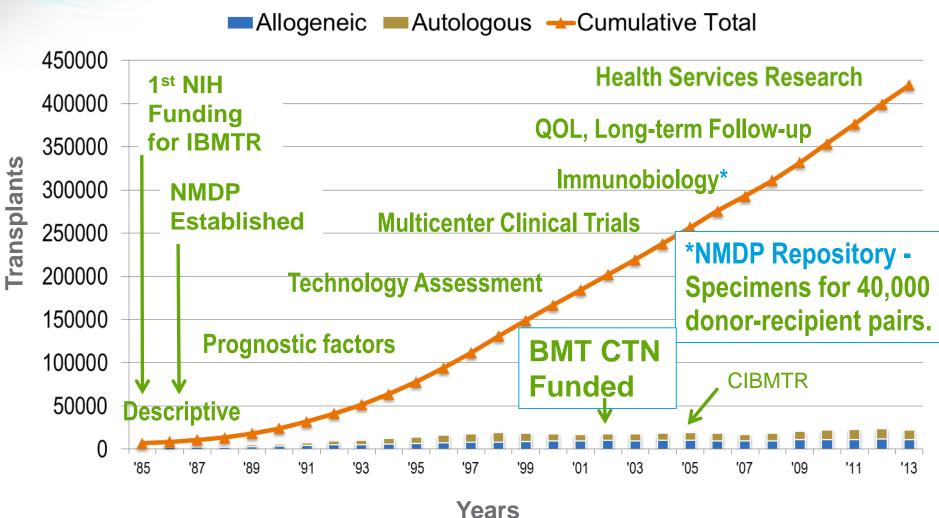
National: US, Japan, Germany, France, etc – 1980s-90s International: 1990s-2000s

-Autologous -Allogeneic



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CIBMTR 420,000 Cases Registered, up to ~10,000 variables per person (most with repeated observations, some extending over >30 years), >1000 publications



Courtesy of Marcelo Pasquini CiBMTR



- Ability to capture all patients of interest
- Ability to capture all data of interest no matter where it is generated
- Ensuring data quality
- Maintaining long-term follow-up
- Ensuring confidentiality, security and regulatory compliance
- Making data rapidly available for multiple uses/users
- Cost-effectiveness
- International regulatory agreement on needed standards and ability to use data to satisfy pharmacovigilance requirements and to form "comparator" for further regulatory filings

Courtesy of Marcelo Pasquini CiBMTR

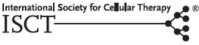


- Is the HSCT academic model a preferred route to develop and provide CAR T therapy?
- What consistency standards are needed?
- What regulatory standards apply to device use for production and subsequent treatment at the hospital level?
  - Lower volume of product generation
  - Less scalable QC/QA
- Will regulatory burden and commercial cost result in medical tourism to less regulated, lower cost options?

#### Local Designed CAR T Products Will Be Available



Cytotherapy, 2016; 18: 1002-1011

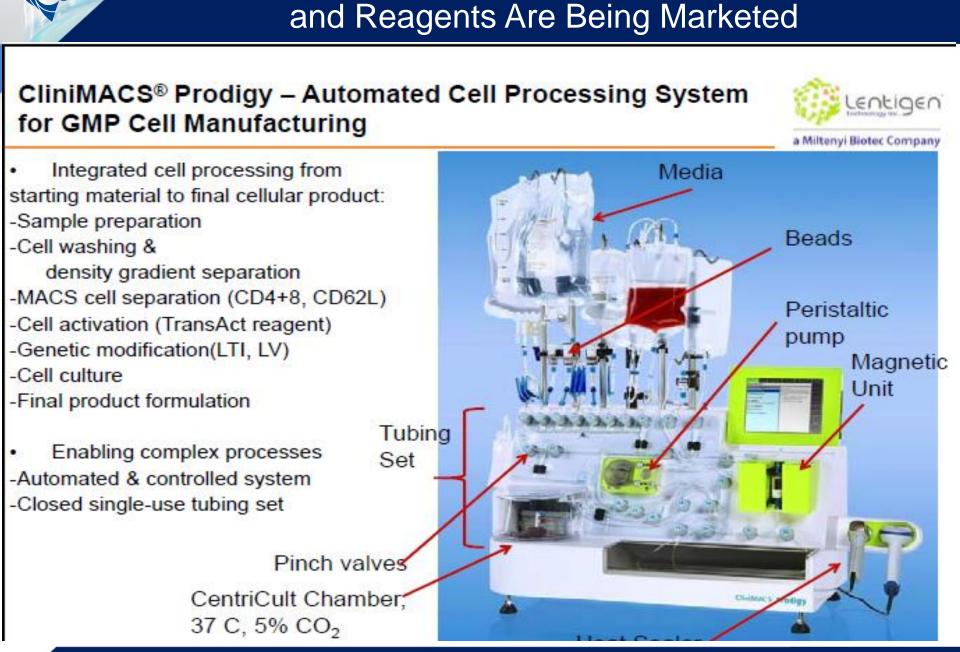




Automated manufacturing of chimeric antigen receptor T cells for adoptive immunotherapy using CliniMACS Prodigy

ULRIKE MOCK<sup>1,\*</sup>, LAUREN NICKOLAY<sup>1,\*</sup>, BRIAN PHILIP<sup>2</sup>, GORDON WENG-KIT CHEUNG<sup>2</sup>, HONG ZHAN<sup>1</sup>, IAN C.D. JOHNSTON<sup>3</sup>, ANDREW D. KAISER<sup>3</sup>, KARL PEGGS<sup>2</sup>, MARTIN PULE<sup>2</sup>, ADRIAN J. THRASHER<sup>1</sup> & WASEEM QASIM<sup>1</sup>

<sup>1</sup>Institute of Child Health, Molecular and Cellular Immunology Unit, University College London, London, UK, <sup>2</sup>University College London Cancer Institute, London, UK, and <sup>3</sup>Research & Development, Miltenyi Biotec GmbH, Bergisch Gladbach, Germany



Hospital Level GMP Cell Manufacturing Systems

- Fully human binders
- Multiple antigen specificity
- Tunable control modules
- Increased cytotoxic/metabolic activity and persistence
- Immune enhancements
- Allogeneic products

If each modification in design and manufacturing defines a new product, how will we improve, innovate and approve these new products?



- Initial product approvals will occur within 2-3 years
- For a given manufacturer, how can process changes be implemented?
  - What is the "bridging" standard?
- Once "full approval" granted, will randomized trials be required for each successive product against the "approved" drug?
- How will commercial developers purchase/afford "the comparator product"?
- How will the concept of "similar active substance" in the context of the EU orphan legislation will be assessed for CAR T cell products?
- What are the clinical differentiators between CAR T cell products to demonstrate "clinical superiority"?