Expanded Access Use of Thrombosomes®

Overview

This Policy regarding Expanded Access to Cellphire's Investigational New Drug Thrombosomes (TBX), an activated freeze-dried platelet, is aimed at addressing the limited availability of platelets that are the result of the COVID-19 pandemic. Blood products are in critical need during this time frame and blood banks are faced with extremely limited supplies.

In the situation where a patient presents with WHO Grade 3 bleeding or higher and is in critical need of platelet/blood products, this Policy facilitates the use of TBX to treat the acute bleed and possibly mitigate the risk of additional critical bleeding. The benefit of the use of TBX in this critical set of circumstances is believed to outweigh the risks of the use of this investigational product.

Policy Statements

In cases where a clinical trial with Thrombosomes is not an option, Cellphire may elect to provide the Sponsor/Investigator expanded access to its investigational product, TBX. Treating Sponsor/Investigators and patients should note that clinical safety and efficacy of investigational products has not been fully established, so all potential risks and benefits should be carefully evaluated before seeking expanded access to this product. It is envisioned that requests could be made by Sponsor/Investigators as either an Individual Patient IND or Emergency Use Individual Patient IND. For more information on submitting requests to the FDA, click here.

This policy is aimed at addressing both types of requests. Cellphire will consider requests for access to TBX, according to internal Cellphire SOPs and as permitted by applicable law, in very specific circumstances, when all the following criteria are met:

- Patient enrollment in a clinical trial using Thrombosomes is not possible.
- The patient has a serious or immediately life-threatening disease for which no alternative therapies are currently available.
- There is adequate clinical evidence of a possible positive benefit to risk profile for the investigational product in the disease indication, suggesting that a clinically meaningful benefit may be expected and that the benefits outweigh any potential risks.
- Providing investigational product through expanded access will not compromise current clinical trials or the regulatory pathway.
- The expanded access request is authorized by both Cellphire and the FDA for the requested indication.

Prior to submission by the Sponsor/Investigator of their request for expanded access to the FDA:

1. After appropriate consultation with the Cellphire Clinical Affairs team and approval of the request, Cellphire will provide a Letter of Authorization (LOA) to the Sponsor/Investigator in support of their IND request for treating a subject through the Expanded Access Program facilitated by FDA. The LOA will include the dose of TBX to use, and number and timing of doses agreed upon by the Cellphire Clinical Affairs team and the Sponsor/Investigator.
2. A physician from Cellphire Clinical Affairs and a Cellphire Clinical Study Team member will work collaboratively with the requesting Sponsor/Investigator to assist them in completing the required form (FDA Form 3926).

3. Cellphire Clinical Study Team will provide the necessary information for the Sponsor/Investigator to complete their hospital template Informed Consent document for single subject Expanded Access.

Once the Sponsor/Investigator has the LOA from Cellphire and has completed FDA form 3926*:

1. The Sponsor/Investigator should contact the FDA to submit the form 3926 and obtain permission to proceed with single patient expanded access.
2. If FDA authorizes the treatment, documentation must be provided to Cellphire (by provision of a separate IND number).
3. Supply of TBX will be shipped by overnight delivery or courier.
4. Patients will be followed for 30 days, to include retrospective review of the patient's clinical record for data collection.
5. Sponsor/Investigator must report serious adverse events as required by FDA per 21 CFR 312.32 and described in Cellphire SOP CTM-022.
6. When treatment is complete the Sponsor/Investigator should provide FDA and Cellphire a summary of expanded access use per 21 CFR 312.310(c)(2).

**NOTE: This process will be accelerated in a situation of an emergency case where FDA has provided a verbal approval to treat.*

Expanded Access Eligibility

At a minimum, the criteria for use of TBX in a single patient expanded access treatment program will include the following:

a) Subject has presented with WHO Grade 3 or higher bleeding which requires treatment with platelet therapy and there is limited availability of platelets or no other approved clinical alternative, or

b) Evidence from the facility blood bank/Medical Director that there are no approved platelet products available for transfusion, or the patient is refractory to platelet transfusion.

c) There are also specific exclusions that are guiding the potential for single patient expanded access of TBX based upon the limited evidence to support the risk to benefit ratio for certain clinical situations. These include the clinical circumstances of a history of thrombosis, thromboembolism, or vascular occlusion/ischemia in the prior six months such as defined by a past history or current diagnosis of one or more of the following:

- Arterial or venous thromboembolic disease including acute coronary syndrome
- Peripheral vascular disease
- Arterial or venous thrombosis (except when a prior history of central line thrombosis has resolved)
- Myocardial infarction (MI)
- Stent placement
- Valve replacement and/or repair
- Sinusoidal obstruction syndrome (veno-occlusive disease)

Requesting Access

Sponsor/Investigators seeking single patient expanded access (either emergency or non-emergency use) to TBX on behalf of their patient should call Cellphire at **301-545-2528** or submit an inquiry to expandedaccess@cellphire.com.

The request will promptly be addressed, generally within 24 hours of receipt by a member of either the Cellphire Clinical Affairs or Clinical Study Teams. Sponsor/Investigators should provide a written summary of the specific medical circumstances that require single patient expanded access and the need for treatment with TBX which briefly includes responses to each of the eligibility requirements listed above.

It should be noted that there is no guarantee that an expanded access request will be granted by FDA. Sponsor/Investigators who receive a TBX dose for their patients through the expanded access program must comply with all applicable FDA regulations, contractual conditions, safety reporting required by FDA, and protection of intellectual property.

This policy is subject to change. Cellphire will revisit the policy periodically and amend it as appropriate. This policy is not a guarantee of access to any of Cellphire's investigational products.