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Revance Therapeutics, Inc. (RVNC)

Overweight

New FDA Guidance Does Not Heighten Risk Surrounding RToo1

CONCLUSION

With the issuance of FDA draft guidance on clinical endpoints for botulinum toxin products for the treatment of upper facial lines (e.g., lateral canthal lines (LCL), or wrinkles around the eyes), there is renewed concern that Revance's evaluation of LCL improvement "at rest" as opposed to "at smile" as a primary measure in its pivotal trials for RT001 will not be sufficient for FDA approval. We would not read the document that way, in part due to RVNC's dispute resolution with the FDA after Phase II work was completed (see below for more details) and given that in general, draft guidance documents can be fluid (and not to mention RT001's pristine safety profile to date). With that in mind, we would not conclude that the risk surrounding RT001 is now heightened. We reiterate our Overweight rating and \$44 PT on RVNC.

- "At smile" or "at rest"? FDA draft guidance a source of renewed anxiety over RT001 endpoints. The guidance document notes that "Measurements at maximum contraction should be used to assess the efficacy... to demonstrate the paralytic effect of the botulinum toxin. This is needed to justify the use of botulinum toxin in a drug product intended for aesthetic use..." In short, maximum contraction means "at smile." Recall that in the pivotal studies for RT001, the composite responder analysis looks at both investigator and patient assessments of LCL severity "at rest" (though RVNC has and will collect data on patients "at smile"). Treatment with RT001 has achieved superiority to placebo in terms of the portion of patients with a 1point improvement in LCL severity "at smile," but not at the 2-point improvement that the guidance document wants. That said, RVNC has argued, with significant support from key opinion leaders, that a 2-point improvement "at smile" essentially produces the dreaded "frozen face" that is commonly stigmatized in the context of neuromodulator treatments.
- RVNC's dispute resolution process at the end of Phase II is supportive of the current clinical endpoints, and that matters. At the end of Phase II, the FDA's Division of Dermatology and Dental Products (DDDP) and RVNC were not in agreement on the "at smile" versus "at rest" question, and as a result, RVNC initiated a formal dispute resolution process whereby the FDA's Office of New Drugs (OND) essentially sided with the company on this issue. This is a formal ruling at a level within the agency that is administratively higher than the DDDP. Further, the document notes, as is standard practice, that a sponsor "can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations." It is our understanding that "applicable statutes and regulations" would encompass the dispute resolution process.
- What is important here? The data. Our view here is that guidance documents are fluid, and that the agency assesses a drug's risk/benefit profile individually based on the totality of the data. Put another way, around 1,400 patients to date have been exposed to RT001, and the safety profile has been in keeping with commercially-available neuromodulators. Assuming the RT001 Phase III data are clean from an efficacy (i.e., meets its primary and secondary endpoints) and safety perspective, we find it hard to fathom how the product would not be approvable.

COMPANY DESCRIPTION

Revance is focused on next-generation neuromodulator treatments.

PRICE: US\$22.50 TARGET: US\$44.00

30x 2020E non-GAAP EPS of \$3.65, disc. by

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Related Companies:

Share Price: 22.50

RVNC

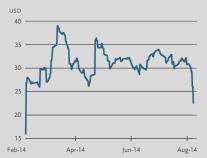
PRICE TARGET

RISKS TO ACHIEVEMENT OF

Risks include clinical and regulatory setbacks for RToo1 and RToo2.

Note: price as of the close Aug. 7, 2014

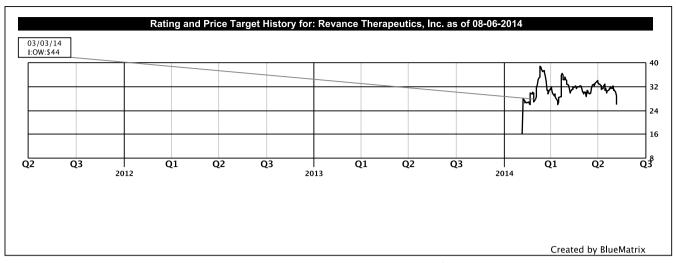
Price Performance - 1 Year



Source: Bloomberg

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S: Suspending Coverage

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N: Neutral

UW: Underweight NA: Not Available UR: Under Review

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			IB Serv./Past 12 Mos.	
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HOLD [N]	210	36.08	22	10.48
SELL [UW]	11	1.89	0	0.00

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