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MEMO

TO: Bonnie Rossello Barry Brand

FR: Sandra Stahl

RE: Discontinuation

5 June 1997

We've written two draft letters to the editor regarding the Lilly discontinuation supplement. One is from Drs. Poliock, Krishnan and Nemeroff. The other would be authored by Ivan.

Here are some points of consideration as you review them:

- We'll have to reference the actual supplement (as opposed to the supplement preview) for statements regarding what Rosenbaum et al. state or allege
- In the issue of I. Clin Psych we had around, all the letters were written as case reports. If this is a requirement, we'll need to ask one of the physicians to provide one.
- The references listed for discontinuation symptoms with all SSRIs is the same for
 both letters, and complete duplication will look fishly if we decide to submit both.
 Are there other references we could draw on for the various drugs? At the very least,
 we can't have the references appear in the same order.

Please have a look at these and let us know how you'd like to proceed. Thanks.

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[Letter from Drs. Nemeroff, Krishnan, and Pollock]

Sir:

Rosenbaum et al. suggest that selective serotonin reuptake inhibitors (SSRIs) with longer half-lives are less likely to cause discontinuation symptoms than those with abselve half-lives. Discontinuation symptoms have been reported with all the SSRIs. In our experience they occur infrequently and are usually mild, transient, and less severe than those associated with discontinuation of tricyclic antidepressants.

For SSRIs with long half-lives and active metabolites, such as fluoxetine, the incidence of discontinuation symptoms can be assessed only if the follow-up is long enough. A study of fluoxetine would require 4 to 5 weeks of follow-up after stopping the medication; we are aware of no such study. In the clinical setting, a patient who abruptly stops treatment with a long-acting agent may not associate a symptom that occurs several weeks later with discontinuation of therapy.

In situations where it is desirable to achieve washout quickly, an antidepressant with a short helf-life and no active metabolites has clear advantages. Such situations include allergic reactions such as anaphylactoid events and rash; adverse reactions such as nausea or bruising (due to depletion of serotonin from platelets); and severe hyponatremia, which has been reported in elderly patients and attributed to inappropriate antidiuretic hormone secretion induced by SSRIs. In addition, if a patient becomes pregnant, one might wish to discontinue therapy as quickly as possible. With fluoxetine, a woman will have the drug and active metabolites in her blood for 5 weeks after discontinuation. A drug with a shorter half-life, if discontinued immediately after conception, could wash out before the fetal-placental circulation is established.

In the absence of an emergency, however, antidepressants should not be discontinued abruptly, primarily because of the risk that depression will recur. With paroxetine, we taper the dose by 50% every 5 days. If any symptoms occur, we proceed more slowly. For patients who experience symptoms after stopping the drug entirely, we start it again at 10 mg/day and then reduce the dose to 10 mg every other day.

For patients who stop taking an antidepressant on their own, it is important to find our whether they did so because of side effects, a perceived lack of efficacy, or some other reason. We recommend reemphasizing to patients the importance of taking the medication every day, not just when they feel depressed, and of not stopping the medication on their own; and then deciding whether to resume the original therapy or switch to another agent.

Charles B. Nemeroff, MD, PhD Atlanta, Georgia

Ranga Krishnan, MD Durham, North Carolina

Bruce G. Pollock, MD. PhD Pittsburgh, Pennsylvania

References

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Letters to the Editor

Discontinuation Symptoms and SSRIs

Sir: I read with interest the recent supplements to the Jounal based on the meeting chaired by Dr. Schatzberg and agree that the constitution of symptoms associated with the abrupt discontinuation of selective serotomin reuptake inhibitors (SSRIs) has emerged at a topic of cirtical interest I have difficulty understanding, Jonewer, some of the conclusions drawn by the Discontinuation-Consensus Panel of authors in this supplement, namely, that "discontinuation reactions are more lakely to occur or to become apparent during discontinuation of SRIs [serotomic responds inhibitors] that have shorter half-lives than the awanded half-life agent fluoractine" and that symptoms of discontinuation are "minimized by a slow taper or by using a drug that has an extended half-life.

A relatively large and growing body of superioral reports, open-tabel studies, and retrospective chart Reviews describes the discontinuation symptoms with the SSRb; Clearly, each of the SSRb, including fluoratine, parotestine, terrasting fluoratine, and fluoramine, accused discontinuation symptoms Abrupt discontinuation of SSRIs is characterized by militired self-resolving symptoms that can include duraness, manage, vomiting, distribes, nervousness, and rhantis.

As suggested by Schauberg, differences in chimination half-lives among the SSR is du appear so result in distinct sengpocal profiles of discontinuation sympasms. Published case reports describe discontinuation symptoms for parametine and servatine man generally persist for 1 to 2 weeks after cessation of treatment, "" which is consistent with the approximately 24-hour elimination balf-lives of these SSRIs. The longer setting fluoretime (with an elimination half-life of 4 to 6 days for the parent compound and 4 to 15 days for the pharmacologically active metabolite, northwatettae) has been reported to cause discondusation symptoms beginning up to 25 days after merapy is stopped The case report literature describes fluorietine-related discontinuation symptoms persisting for up to 56 days. 32.24 Thus, the longer elimination half-life of flavoretime appears to be associated with discontinuation symptoms that occur later and last longer compared with those associated with shorter-acting SSR13.

The preliminary findings from one direct comparative study of the SSRIs suggest that fluoretime, unlike parameters or sertialise, is not associated with discontinuation symptoms. However, pattents in this study were assessed for only 5 to 8 days after stopping therapy, which is generally not a sufficiently long period of time for discontinuation symptoms with fluoretime to appear If clinical trials are to accurately study between-agent differences, they must be designed with sufficiently long follow-up to observe discontinuously symptoms that occur after long-acting agents are stopped

Regardless of the suggestion by Rosenbaum and Zajecka* in the supplement that the abrupt discontinuation of SSRIs with longer elimination half-lives results in self-appening, discontinuation symptoms nevertheless occur. Unlike agents with shorter half-lives, drugs with prolunged climination half-lives are associated with an extended duration of adverse effects, drug accumulation, complicated intration schedules, and extended femi

exposure for women who conceive during therapy. All SSRIs should be tapared when therapy is stopped unless there is a medical reason for immediate removal of the drug. The time course of advorse effects is protonged for SSRIs with long elimination half-lives, which, in the case of scrious sequelate (e.g., scrotonergic syndromes of mappropriate an-padiatric hormonic secretions) or a fruil, elderly patient, represents a real clinical problem.

Each of the SSRIs suuses discontinuation symptoms, and the time course of symptoms is streetly related to the alumination half-life of the drug and the duration of therapy. The majority of published clinical data on this topic is derived from ascendial oase reports, "which generally rely on parients" observations of adverse effects. Clearly, patients are more likely to attribute discontinuation symptoms to a drug when symptoms occur shortly after therapy is supped (as would occur with a shorter half-life agent) than when symptoms occur I week or more after discontinuing treatment (as with an agent with a longer half-life). Thus, the suggestions by some lovestigators that SSRIs with prolonged elimination palf-lives are associated with a manual rate of discontinuation symptoms.^{25,26} may be based on data that are spurrously low and not representative of actual prevalence.

The Discontinuation Consensus Panel" argues in the supplement that chalinergic rebound is one putative mechanism for discontinuation symptoms, particularly with peroactine. This peary is based on in vitro findings that, among the SSRIS, paroxetipe possesses the highest affinity for muscarnic receptors " Mowever, recent data from our laboratory do not support the extrapojation of these in vitro findings to the clinical setting as was done by the authors of the supplement. We compared serum unneholinergients and anticholinergie side effects in 54 depressed, alderly pations who were being reased with therapeutic doses of paroxettine or normpryline. Under these chaically relevant conditions, paroxetine exhibited as 8-fold lower level of serum anticholineration (0.07 ± 0.19 pmol auropine equivalents) than normpryline (0.57 ± 0.45, p = .0004). In addition, normptyline was associated with abmificantly more dry mouth and tachycardia than paroxettee "Paroxettee has also been shown to be devoid of adverse anticholinergic cardiovascular effects in depressed patients with ischemic heart disease as compared with nortriptyline, which, like giver tricyclic mindepresents, has clinically arguificant cardiac-effects in this population." Manufacturers' prescribing information for paroactine and sermaline describes similar rines of dry mouth for these agents 1,12 despite differences in in vitro affinities for the musesrinic receptor.2 Thus, although peroxenne is the most articleinergic SSRI in an in viero sening, clinical days obtained both under regorously controlled conditions and from climical experience do not support the argument made in the supplement.

As stated in the supplement, the available evidence demonstrates that abrupt egssation of SSRI therapy can be associated with a mild, transient constellation of somatic and psychological symptoms. Some of the conclusions drawn by the authors of the supplement wattent a closer look. Clinical experience and published reports demonstrate that, regardless of elimination half-life, all of the SSRIs cause discontinuation symptoms after abrupt withdrawal and all SSRIs should be gradually tapered

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Letters to the Editor

when stopping therapy. Should it be needed, management conaists of restarting the SSRI and gradually supering the dose Alternatively, patients can be educated about the transient nature of these symptoms and encouraged to wait matil the symptoms resolve. Rather than airecting our efforts toward the reintively infrequent, minor, and transient discontinuation symptoms associated with SSRI therapy, chancians may be well advised to focus their energies on the greater names of efficacy, safery, and Patient outcome

1. Schnedorg AF, Class. Antalopressent Discontinuation Syndrome-Update on Scrotanta Respirate interpers. J Clin Psychiatry 1997. 58(suppl 7)

2 Schenberg AF Interference. Annaepressus discommission aya-arome: an appare on agroupus response anabators. J Clin Psychiatry 1997, 36(suppl 7) 3-4.

3. Berlin CS. Floranciate whaterand symptoms [score] J Clin Psychiatry so. 1996 57, 93-94.

Homeron St., Kreps W., William M., w. al. SSRI dear interruption study determined for New Radianch Program and Abstracts of the 150th Attended Meeting of the American Programs of Association, May 20, 1997, San Diego, Calif Abstract NR188718

5. Embader E Fluoretine withdrawal [letter] Age | Psychiatry 1995; 152.1235

Keesser MS, Bushnell WD, Oaker R, et al. Adqueste print, random-and study to provide safety antirensuosa on systematic Superinted States of Particles of Particular Control of Particular Control of Particular Vision of Particular Office of Particular of Particul

manual mosting of the New Ciminal Drug Evaluation Unit: May

27-30, 1997; Book Raron, Fin

W. Michelson D., Onawols R., Scattey C. Abropt ductorion. Shounc, a regulorment, placebo-commuted study In; New Research's Programs and Abstracts of the 150th Astronal Meeting of the American Psychistric Association, May 211, 1997, See Decgo, Cellif Atherizon N#200 122

9. Stockistes IA, Stockistes CA Extrapyranidal Symptotics upon disconmusion of fluoration junits Am J Phythingy 1991;148:1263

- 10. Bur LC, Coulmen Wil, Price LH. Physical symptoms associ with personation discontinuation (lenet). Am I Psychiatry 1994;
- 11. Definitions C. Schuleberg AF Physical symptoms are rousing withdrawal [letter] Am J Payoniany 1995;152-1235-1256 12. Dominguise RA, Goodnick Fl Adverse events after the abstart del-
- communion of puroxetase. Plantaneotherapy 1993, 15 774-760
 13. Fava GA, Granda S. Withdrawal syndromes after pareactine and sentraline automitanutron (letter). J Clie Psychophismicon 1995,15
- 14. From L. Lad S. Shock-take retrained after decontrauszon of scientive sergeonar reaptake subibisors (lesser) Am J Payeniumy 1995; 157-210 15. Philips SO. A pussible paracritic attornaval syndrome [lene.] Am J Psychiatry 1995;152:645-646

- 16 PyAc RE Parosense williamwal syndrome [letter]. Am J Psychiatry 1995,152 149-130
- 17 Leiter FL, Nierenberg AA, Sauders KM, et al. Discontinuation reactions following sermaline. Biol Psychiatry 1995;38-698-605
- 18. Louis A.K., Lussen R.A., Ajun L.J. Wiendrawal reaction after technology discontinuation [letter] Am J Psychiatry 1994,151 450-451
- 19 Black DW, Wester R. Gabel J. The abrupt descriptions of flavo amor in patients with panie disorder 7 Clin Psychiatry 1993;54: 146-149
- 20. Stabadi E. Flivorament wandrawai syntrome (inner) Br I Psychia-Ty 1992;160:283-284
- Resemblish If, Zajecta I. Claural management of antisepressing shearmastan I Clan Psychiatry 1997; \$8(suppl 7):37-40
- 22. Storabaco H. The acrossoms syndrome. Am J Psychology 1991,148. 705-713
- 23 Deservation R. Mulman RH. Flutacture-induced syndrome of step-

propriets sundustric hormone secretion; a general read report and a view of the lettrange. J Genete Psychiatry Neurol 1994,7:254-256

24 Zijietta J, Tracy KA, Mitchell S. Discottanesson symptoms after termination with actionnia property matches is a speciative review, J Clin Psychiatry 1997,58,291–297

Completed NJ, Bell CI, Potoker JP. Sermente respente anti-beter withdrival I Chn Psychophurmuol 1996,16.356-362 26. Price JS, Wasier PC, Wood SM, et al. A compenson of the

post-reactiving safety of four selective reference re-uptake ethibilities suchedang the revestigation of symptoms occurring on windsweet Br J Clea Plantingo) 1996;42:757-763

27 Schaleberg AP, Haddad P, Kaplan EM, et al, of The Discontinuation Consenses Panel Possible biological medianisms of the serotomis roughthe adulator discontinuation syndrome I Clin Psychiatry 1997; 58(suppl 7):23-27

Rachelson B. The pharmacology of antidepressants at the synapse focus on the never compounds. I Clin Payetiany 1994,51(9, suppl A134-41

29 Pollock BG, Millarm BH, Nebes R, at at. Section ambeholinery city in older patterns treated with paroxecuse of somephyline. Att J Psychia-ny 1998; 155.1170-1112

30 Roote S, Langhriss-Thude F, Konnedy IS, et al. Compension of paroaclate and normally has at depressed patents with inchemic heart de-core JAMA 1998,279-287-291

31 Paul [persage mert] Pmintelpint, Pn. SmithKino Beschum Phar-Dracevolenh, 1997

52. Zoled [package meet] New York, NY Proof Inc. 1997

Bruce G. Pellock, M.D., Fh.D. Pinsburgh, Pennsylvania

Dr. Schatzberg Replies

Sir: We appreciate the commonies of Dr. Poliock regarding the special supplement on SSRI discontinuation. He notes that fluoration can be associated with discontinuation symptoms but that these occur several weeks after discontinuation. We agree that they can occue. However, these rebound symptoms have been less frequently reported with fluoretime than such almost all the other SSRIs and are rarely a problem. In a 6-week follow-up, double-bland study of decontinuation from fluoreman the percentage of patients reporting any adverse events was 30% for patients continuing on fluorestas and 40% for those switched to placebo. The incidence of dezuness at 6 weeks was 5% for doze who discontanted venus 1% for those who switched to placebo. Thus, the problem does appear to be less of an about with fluorence, which has a long half-life that less of an issue with fluoreane, which has a long half-life, than

The apparently higher rates of discontinuation symptoms with the shorter acting agents should not be construed as an indication that we need not be aware of the possibility of such symptoms with longer acting agents. Suther, they are more likely to occur and to be apparent with shorter acting agents. where there is less time to achieve homeospass. Of interest is the recent analysis of the World Health Organization database that noted higher rates of reporting of such symptoms in panents discontinuing from puroxerine and seruratine than in those discontinuing from fluoxetine? Moreover, they noted that fluoutline was more commonly associated with psychiatric resctions (nervousness, anxiety, depression, etc.) than with CNS manufestanous (dizziness, headache, etc.) The opposite was true for paroxetine and actualine. Thus, they concluded that these dans indicated a possible qualitative difference between the SSRIs with respect to the mature of the withdrawal Syndrome "Great This study reported mean days off drug to polist of symptoms of 9.5, 24, and 6.6 days for paroxistine, fluaxetine, and serualme, respectively. The respective medians were 2, 3, and 2 days, indicating a showing of the date and suggesting that some patients may demonstrate earlier discontinua-