EXHIBIT 16
BLA 761072

Pfizer Inc.
445 Eastern Point Road
Groton, CT 06340

Attention: Robert Schaum, PhD
Director, Worldwide Regulatory Strategy

Dear Dr. Schaum:

Please refer to your Biologics License Application (BLA) dated February 13, 2017, received February 13, 2017, and your amendments, submitted under section 351(k) of the Public Health Service Act for Ixifi (infliximab-qbtx) for injection, 100 mg/vial.

**LICENSING**

We are issuing Department of Health and Human Services U.S. License No. 2060 to, Pfizer Ireland Pharmaceuticals, Ringaskiddy, Cork, Ireland under the provisions of section 351(k) of the Public Health Service Act controlling the manufacture and sale of biological products. The license authorizes you to introduce or deliver for introduction into interstate commerce, those products for which your company has demonstrated compliance with establishment and product standards.

Under this license, you are authorized to manufacture the product Ixifi (infliximab-qbtx). Ixifi is indicated for the following indications.

1. Rheumatoid Arthritis (RA) in combination with methotrexate:
   - reducing signs and symptoms, inhibiting the progression of structural damage, and improving physical function in patients with moderately to severely active disease.

2. Psoriatic Arthritis (PsA):
   - reducing signs and symptoms of active arthritis, inhibiting the progression of structural damage, and improving physical function.

3. Ankylosing Spondylitis (AS):
   - reducing signs and symptoms in patients with active disease.
4. Crohn’s Disease (CD):
   - reducing signs and symptoms and inducing and maintaining clinical remission in adult patients with moderately to severely active disease who have had an inadequate response to conventional therapy.
   - reducing the number of draining enterocutaneous and rectovaginal fistulas and maintaining fistula closure in adult patients with fistulizing disease.

5. Pediatric Crohn’s Disease:
   - reducing signs and symptoms and inducing and maintaining clinical remission in pediatric patients with moderately to severely active disease who have had an inadequate response to conventional therapy.

6. Ulcerative Colitis (UC):
   - reducing signs and symptoms, inducing and maintaining clinical remission and mucosal healing, and eliminating corticosteroid use in adult patients with moderately to severely active disease who have had an inadequate response to conventional therapy.

7. Plaque Psoriasis (Ps):
   - treatment of adult patients with chronic severe (i.e., extensive and/or disabling) plaque psoriasis who are candidates for systemic therapy and when other systemic therapies are medically less appropriate.

MANUFACTURING LOCATIONS

Under this license, you are approved to manufacture infliximab-qbtx drug substance at [redacted]. The final formulated product will be manufactured, filled, labeled, and packaged at your facility in [redacted]. You may label your product with the proprietary name, Ixifi, and will market it in single use-vials 100 mg per vial for injection.

DATING PERIOD

The dating period for Ixifi shall be 42 months from the date of manufacture when stored at 2 °C to 8 °C. Ixifi may be stored up to a maximum of 30 °C for a single period of up to 6 months but not exceeding the original expiration date. The date of manufacture shall be defined as the date of final sterile filtration of the formulated drug product. The dating period for your drug substance shall be [redacted] months from the date of manufacture when stored at [redacted] or [redacted] months when stored at [redacted].
FDA LOT RELEASE

You are not currently required to submit samples of future lots of Ixifi and each kit component to the Center for Drug Evaluation and Research (CDER) for release by the Director, CDER, under 21 CFR 610.2. We will continue to monitor compliance with 21 CFR 610.1, requiring completion of tests for conformity with standards applicable to each product prior to release of each lot.

Any changes in the manufacturing, testing, packaging, or labeling of Ixifi, or in the manufacturing facilities, will require the submission of information to your biologics license application for our review and written approval, consistent with 21 CFR 601.12.

APPROVAL & LABELING

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

WAIVER OF HIGHLIGHTS SECTION

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 601.14(b)] in structured product labeling (SPL) format, as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content of labeling must be identical to the enclosed labeling (text for the package insert, text for the patient package insert, Medication Guide). Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and container labels that are identical to the enclosed carton and immediate container labels, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (May 2015, Revision 3). For administrative purposes, designate this submission “Final Printed Carton and
Container Labels for approved BLA 761072.” Approval of this submission by FDA is not required before the labeling is used.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

The following comments pertain to Rheumatoid Arthritis indication:

We are waiving the pediatric studies requirement for the Polyarticular Juvenile Idiopathic Arthritis (pJIA) in pediatric patients 0 to less than 2 years of age because necessary studies are impossible or highly impracticable given that the disease is rarely diagnosed in this population.

We are waiving the pediatric studies requirement for the Polyarticular Juvenile Idiopathic Arthritis (pJIA) in pediatric patients ages 2 to < 4 years old because PF-06438179 does not represent a meaningful therapeutic benefit over existing therapies and is not likely to be used in a substantial number of pediatric patients.

The following comment pertains to Psoriatic Arthritis indication:

We are waiving the pediatric study requirements for pediatric patients 0 to 17 years of age for this indication because necessary studies are impossible or highly impracticable.

The following comment pertains to Ankylosing Spondylitis indication:

We are waiving the pediatric study requirements for pediatric patients 0 to 17 years of age for this indication because necessary studies are impossible or highly impracticable.

The following comments pertain to Crohn’s Disease indication:

We are waiving the pediatric study requirements for pediatric patients with Crohn’s disease less than 6 years of age because necessary studies for this product (i.e., dedicated studies limited to pediatric patients 2 to less than 6 years of age) are impossible or highly impracticable due to the low incidence of the disease in this specific pediatric age group. Additionally, this condition is rare in patients less than 2 years of age.

The following comments pertain to Ulcerative Colitis indication:

We are waiving the pediatric study requirements for pediatric patients with ulcerative colitis less than 6 years of age because necessary studies for this product (i.e., dedicated studies limited to pediatric patients 2 to less than 6 years of age) are impossible or highly impracticable.
impracticable due to the low incidence of the disease in this specific pediatric age group. Additionally, this condition is rare in patients less than 2 years of age.

The following comment pertains to Plaque Psoriasis indication:

We are waiving the pediatric study requirements for pediatric patients 0 to 17 years of age for this indication because necessary studies for this product (i.e., dedicated studies limited to pediatric patients with chronic severe (i.e., extensive and/or disabling) plaque psoriasis) are impossible or highly impracticable.

**POSTMARKETING COMMITMENTS NOT SUBJECT TO THE REPORTING REQUIREMENTS UNDER SECTION 506B**

We remind you of your postmarketing commitments:

3318-1 Repeat the validation using a dye ingress method which has been shown to reliably detect breaches.

The timetable you submitted on December 6, 2017, states that you will conduct this study according to the following schedule:

<table>
<thead>
<tr>
<th>Final Report Submission</th>
<th>June 2018</th>
</tr>
</thead>
</table>

3318-2 Perform 3 consecutive media fills simulating the entire PF-06438179 DP manufacturing process using the PF-06438179 container closure system. The media fills will include worst-case hold and processing times, and be performed.

The timetable you submitted on December 6, 2017, states that you will conduct this study according to the following schedule:

<table>
<thead>
<tr>
<th>Final Report Submission</th>
<th>April 2018</th>
</tr>
</thead>
</table>

3318-3 Complete PQ shipping validation studies using PF-06438179 DP and submit the validation report.

The timetable you submitted on December 6, 2017, states that you will conduct this study according to the following schedule:

<table>
<thead>
<tr>
<th>Final Report Submission</th>
<th>August 2018</th>
</tr>
</thead>
</table>

3318-4 Conduct bioburden method qualification using samples from 2 additional batches of PF-06438179 DS.
The timetable you submitted on December 6, 2017, states that you will conduct this study according to the following schedule:

**Final Report Submission** January 2019

3318-5 Reassess and tighten all[[0][1][0][4][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0] drug substance endotoxin acceptance criteria based on process capability after 20-30 data points have been collected.

The timetable you submitted on December 6, 2017, states that you will conduct this study according to the following schedule:

**Final Report Submission** January 2019

3318-6 Implement an assay assessing[[0][1][0][4][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0][0] the Drug Substance release specification. Submit the proposed release specification as a Prior Approval Supplement described under 21 CFR 601.12 (b).

The timetable you submitted on December 6, 2017, states that you will conduct this study according to the following schedule:

**Final Report Submission** January 2019

Submit clinical protocols to your IND 114828 for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this BLA. In addition, under 21 CFR 601.70 you should include a status summary of each commitment in your annual progress report of postmarketing studies to this BLA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled “Postmarketing Commitment Protocol,” “Postmarketing Commitment Final Report,” or “Postmarketing Commitment Correspondence.”

**PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltville, MD 20705-1266

Reference ID: 4194826
As required under 21 CFR 601.12(f)(4), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf. Information and Instructions for completing the form can be found at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

**REPORTING REQUIREMENTS**

You must submit adverse experience reports under the adverse experience reporting requirements for licensed biological products (21 CFR 600.80). You should submit postmarketing adverse experience reports to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Central Document Room  
5901-B Ammendale Road  
Beltsville, MD  20705-1266

Prominently identify all adverse experience reports as described in 21 CFR 600.80.

You must submit distribution reports under the distribution reporting requirements for licensed biological products (21 CFR 600.81).

You must submit reports of biological product deviations under 21 CFR 600.14. You should promptly identify and investigate all manufacturing deviations, including those associated with processing, testing, packing, labeling, storage, holding and distribution. If the deviation involves a distributed product, may affect the safety, purity, or potency of the product, and meets the other criteria in the regulation, you must submit a report on Form FDA-3486 to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Compliance Risk Management and Surveillance  
5901-B Ammendale Road  
Beltsville, MD  20705-1266

Biological product deviations, sent by courier or overnight mail, should be addressed to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Compliance Risk Management and Surveillance  
10903 New Hampshire Avenue, Bldg. 51, Room 4206  
Silver Spring, MD  20903

Reference ID: 4194826
If you have any questions, call Sadaf Nabavian, Senior Regulatory Project Manager, at (301) 796-2777.

Badrul A. Chowdhury, M.D., Ph.D.
Director
Division of Pulmonary, Allergy, and Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURES:
Content of Labeling
Carton and Container Labeling
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

NIKOLAY P NIKOLOV
12/13/2017
Signed under the authority delegated by Dr. Badrul A. Chowdhury, M.D., Ph.D., Division Director, DPARP.