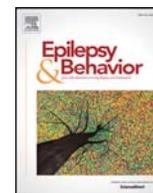




Contents lists available at ScienceDirect

Epilepsy & Behavior

journal homepage: www.elsevier.com/locate/yebeh

Q2 Editorial

2 Reduced efficacy and risk of seizure aggravation when cannabidiol is
 3 used without clobazam

4 Benzodiazepines have broad efficacy as antiseizure agents, and are
 5 universally recognized as the treatments of choice for the termination
 6 of ongoing seizures and acute repetitive seizures (seizure clusters) [1].
 7 Conventional 1,4-benzodiazepines, such as clonazepam, lorazepam,
 8 and diazepam, are not generally useful for the chronic treatment of epi-
 9 lepsy because their efficacy wanes over time. Such tolerance may occur
 10 anytime after a few days following initiation of treatment but most
 11 commonly occurs within one to six months of continuous treatment
 12 [2]. The 1,5-benzodiazepine clobazam, like 1,4-benzodiazepines, is a
 13 positive allosteric modulator of synaptic GABA_A receptors; no other
 14 functionally relevant molecular target is known. However, in contrast
 15 to 1,4-benzodiazepines, clobazam is widely used in the chronic treat-
 16 ment of focal and generalized seizures, and has application in the treat-
 17 ment of diverse epilepsy syndromes [3,4]. The drug is often a
 18 component of the regimen used to treat epileptic encephalopathies, in-
 19 cluding Dravet syndrome and Lennox–Gastaut syndrome [5–7].

19 Q6 Clobazam is extensively metabolized in the liver by CYP and non-
 20 CYP transformations [8]. It has up to 14 metabolites. However, the
 21 major metabolite is *N*-desmethylclobazam (norclobazam), which is
 22 produced largely by CYP3A4. Norclobazam is then mainly metabolized
 23 by CYP2C19 except in CYP2C19-poor metabolizers with a CYP2C19 in-
 24 active allele. With long-term administration, levels of norclobazam,
 25 which has a longer half-life than clobazam, are 8- to 20-times higher
 26 than those of the parent. Norclobazam is an active metabolite. Following
 27 acute administration in mice, norclobazam is an effective antiseizure
 28 agent, but is 2.4-fold less potent than clobazam [9]. In cellular neuro-
 29 physiological studies, norclobazam is equipotent with clobazam as a
 30 positive modulator of GABA_A receptors [10–12]. However, in studies in
 31 mammalian cells, norclobazam is modestly less efficacious at enhancing
 32 GABA_A receptor responses [10,12]. Limited data suggest that CSF levels
 33 of norclobazam are about 80% that of clobazam [13]. The reduced effi-
 34 cacy as well as modestly reduced blood–brain barrier permeation may
 35 account for the reduced antiseizure activity of norclobazam. Neverthe-
 36 less, because norclobazam plasma levels are so much higher at steady
 37 state, seizure protection during chronic therapy is mainly due to
 38 norclobazam.

39 Q7 The maximum potentiation of GABA_A receptor ($\alpha 3\beta 3\gamma 2L$) re-
 40 sponses with norclobazam is roughly one-half that of clobazam or diaz-
 41 epam [10]. Because norclobazam has reduced efficacy as a positive
 42 allosteric modulator of GABA_A receptors, it can be considered a partial
 43 agonist. There is evidence that partial agonists at the benzodiazepine
 44 site of GABA_A receptors exhibit less propensity for the development of
 45 anticonvulsant tolerance than full agonists [14–16]. Therefore, a plausi-
 46 ble hypothesis to explain the infrequent occurrence of tolerance with
 47 clobazam is the partial agonist activity of norclobazam [17]. It is worth

48 mentioning that animal studies do show robust tolerance to clobazam
 49 itself. However, it is not apparent that norclobazam is the dominant an-
 50 tiseizure principal in these animal studies as appears to be the case with
 51 chronic clobazam therapy in humans. Interestingly, clonazepam, which
 52 is a highly potent 1,4-benzodiazepine, has partial efficacy similar to that
 53 of norclobazam [10]. There is evidence from studies in laboratory ani-
 54 mals that clonazepam has low propensity for tolerance development
 55 [18–21]. Clonazepam is commonly used chronically to treat a wide
 56 range of focal and generalized seizure types [22]. As is the case with
 57 clobazam, tolerance to clonazepam may be infrequent [23], which
 58 could also be due to its partial agonist character.

59 Q8 Cannabidiol oral solution (Epidiolex) was recently approved in the
 60 United States for the treatment of seizures associated with Lennox–
 61 Gastaut syndrome or Dravet syndrome. The drug can influence both
 62 phase I and phase II biotransformations of concomitant medications
 63 through effects on cytochrome P450 (CYP) isozymes and uridine 5'-
 64 diphosphoglucuronosyltransferases. Importantly, because of its activity
 65 as an inhibitor of CYP2C19, cannabidiol causes a 2.5 to 3-fold increase in
 66 plasma concentrations of norclobazam [24,25] (Fig. 1). A critical con-
 67 cern addressed by the Food and Drug Administration (FDA) in its review
 68 of Epidiolex is whether the drug has antiseizure activity alone or
 69 whether its effects are entirely pharmacokinetic and due to the eleva-
 70 tion in norclobazam levels. The concern became evident when in an
 71 open-label trial of cannabidiol, only 27% of patients not taking clobazam
 72 experienced a reduction in seizures whereas 51% of those who did take
 73 clobazam were responders [26]. Similarly, in a trial in tuberous sclerosis,
 74 33% of patients not taking clobazam experienced a response in compar-
 75 ison with 58% of those taking concurrent clobazam [27]. There is exten-
 76 sive evidence in animal models that cannabidiol has antiseizure activity,
 77 although the doses required are high [28,29]. Moreover, results from
 78 open-label uncontrolled studies have been interpreted as indicating
 79 that cannabidiol does reduce seizure frequency even in the absence of
 80 clobazam [30]. To rigorously address the issue, prospective controlled
 81 trials are required.

82 Q9 The best information available at present comes from the results of
 83 three pivotal clinical trials of cannabidiol presented for FDA registration
 84 [31]. Subgroup analyses of the data from these trials demonstrate that
 85 cannabidiol is more effective in the presence of clobazam and raise the
 86 question of whether cannabidiol has been shown to be effective in the
 87 absence of clobazam. As shown in Fig. 2, in all three pivotal studies,
 88 two in Lennox–Gastaut syndrome and one in Dravet syndrome, in sub-
 89 jects in whom clobazam was part of the baseline medications, when
 90 cannabidiol 20 mg/kg was added, there was a significant median reduc-
 91 tion in seizure frequency that exceeded the placebo response. By con-
 92 trast, when cannabidiol 20 mg/kg was added to a baseline regimen
 93

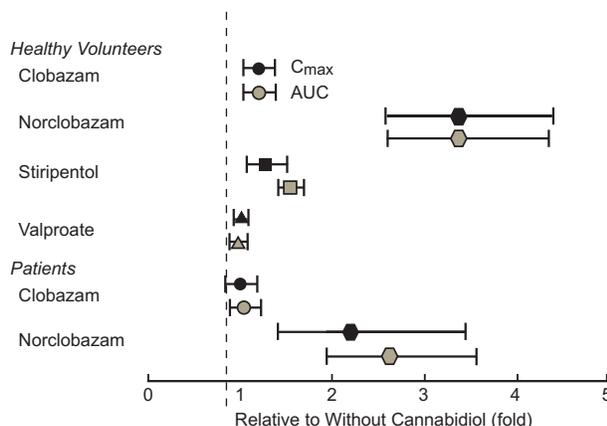


Fig. 1. Geometric mean ratios (relative to without cannabidiol) and 90% confidence intervals in healthy volunteers and patients for impact of cannabidiol on pharmacokinetic parameters of baseline medications and norclobazam after treatment with clobazam in healthy volunteers and patients. C_{max}, maximal concentration in plasma (black symbols); AUC, area under the concentration-time curve (gray symbols). Adapted from Clinical Pharmacology and Biopharmaceutics Review(s), FDA Drug Approval Package: Epidiolex (Cannabidiol) [31].

95 that did not include clobazam, the placebo-subtracted median seizure
 96 reduction was less, and the 95% confidence interval encompasses 0.
 97 The only exception to this pattern is in the single cannabidiol
 98 10 mg/kg group in Study 1414 of Lennox–Gastaut syndrome where
 99 the overall response was less than in the subjects treated with a
 Q8 20 mg/kg cannabidiol dose and baseline clobazam status did not appear
 101 to be relevant. It is noteworthy that similar subgroup analyses examin-
 102 ing other concomitant medications did not show a pattern comparable
 103 to that obtained with clobazam.

104 Taken together, the results of the two open-label studies [26,27] and
 105 the subgroup analysis of the pivotal trial data [31] suggest that concom-
 106 itant clobazam may increase the efficacy of cannabidiol and raise the
 107 question of whether concomitant clobazam is necessary for the activity

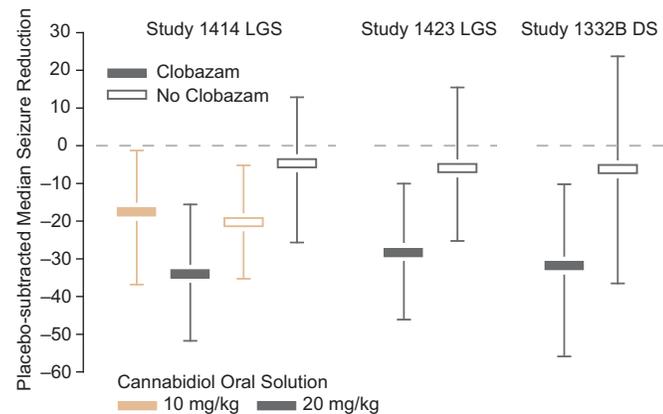


Fig. 2. Subgroup analyses in the three pivotal trials presented for registration of cannabidiol oral solution (Epidiolex) assessing cannabidiol responses in subjects who were and were not taking clobazam in their baseline medication regimen. Open (clobazam) and closed (no clobazam) rectangles indicate placebo-subtracted median difference values of percent reduction in seizure frequency. Error bars indicate 95% confidence intervals (CI) based on Hodges–Lehmann estimator. Study 1414 in Lennox–Gastaut syndrome (LGS) included placebo, and cannabidiol 10 mg/kg and 20 mg/kg dose groups. Study 1423 in LGS and Study 1332B in Dravet syndrome included placebo and cannabidiol 20 mg/kg dose groups. In all but one comparison, the magnitude of the effect was smaller in the no clobazam subgroup, and the 95% CI encompasses no seizure reduction (0%). The single exception is the 10 mg/kg cannabidiol dose group in Study 1414 where the magnitude of effect overall is less and there was no impact of clobazam. Subgroup analyses for the concomitant medications valproic acid, lamotrigine, levetiracetam, rufinamide, and stiripentol did not show such nearly consistent differences. Numerical values taken from Other Summary Review, FDA Drug Approval Package: Epidiolex (Cannabidiol) [31].

of cannabidiol. The FDA partially examined this question in a subgroup 108
 analysis of subjects taking clobazam and stiripentol in the pivotal Dravet 109
 syndrome trial (Study 1332B). One possible explanation for the posi- 110
 tive interaction between clobazam and cannabidiol is the increase in 111
 norclobazam caused by cannabidiol. Subjects in Study 1332B receiving 112
 stiripentol were presumed not to have had an increase in norclobazam 113
 when cannabidiol was added because stiripentol is also a CYP2C19 in- 114
 hibitor and would be expected to maximally elevate norclobazam 115
 levels. In these subjects, there was an 80% reduction in seizures in sub- 116
 jects taking cannabidiol compared to 50% in placebo, leading to the FDA 117
 to conclude that elevation of norclobazam is not sufficient to account for 118
 the antiseizure activity of cannabidiol. However, this analysis does not 119
 exclude the possibility that there is a synergistic pharmacodynamic in- 120
 teraction between cannabidiol and clobazam. 121

Somnolence, sedation, and lethargy are a common occurrence with 122
 cannabidiol. The rate of these adverse effects is considerably higher in 123
 patients on concomitant clobazam (44% in cannabidiol-treated patients 124
 taking clobazam compared with 13% in cannabidiol-treated patients not 125
 taking clobazam or valproic acid) [31]. Therefore, whether the interac- 126
 tion between cannabidiol and clobazam is pharmacokinetic or pharma- 127
 codynamic, it applies to adverse effects as well as efficacy. 128

While the predominant response to cannabidiol in clinical trials is a 129
 reduction in seizure frequency, some patients have experienced wors- 130
 ening, in a few cases dramatically so [32]. In an open-label trial, status 131
 epilepticus was reported as the most frequent treatment-emergent seri- 132
 ous adverse event (6%) [26]. Many antiseizure drugs can cause an ag- 133
 gravation of epilepsy [33–35]. The aggravation can be manifest as an 134
 increase in the frequency or severity of existing seizures, the emergence 135
 of new seizure types, or the occurrence of status epilepticus. Seizure ag- 136
 gravation has been mainly attributed to an “inverse pharmacodynamic 137
 effect,” in which specific effects of the drug on its antiseizure target 138
 lead to seizure worsening rather than improvement. The antiseizure 139
 target or targets of cannabidiol have not been identified so it is not pos- 140
 sible to speculate on how it might cause an inverse pharmacodynamic 141
 effect. In symptomatic generalized epilepsies with multiple seizure 142
 types such as the Lennox–Gastaut syndrome, only certain seizure 143
 types may be aggravated. Seizure aggravation is believed to be a particu- 144
 lar risk in children with refractory seizures in epileptic encephalopa- 145
 thies [35]. Therefore, it is concerning that there was evidence of excess 146
 seizure worsening in patients treated with cannabidiol who did not re- 147
 ceive clobazam in the pivotal clinical trials [31]. As shown in Fig. 3, for 148
 patients taking concurrent clobazam (left panel), the number of patients 149
 exhibiting an increase in seizure frequency (intersection of curves with 150

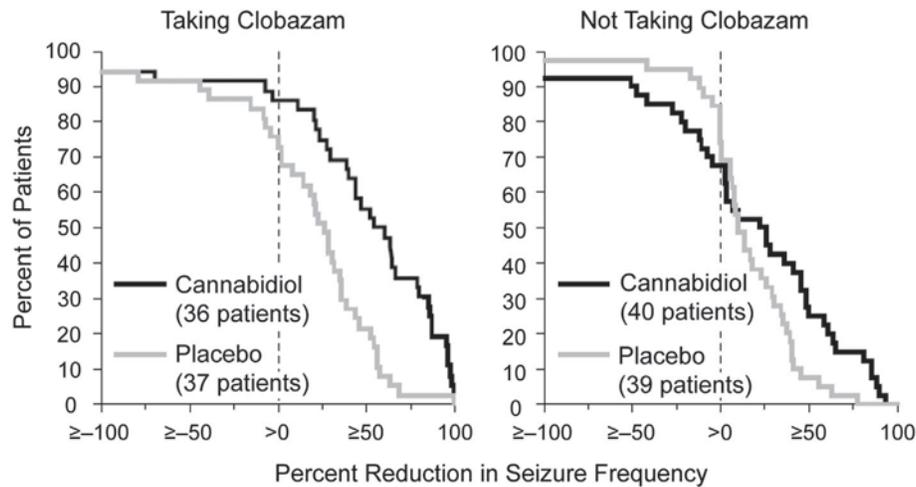


Fig. 3. Cumulative distributions for drop seizures during treatment period in Study 1414 (Lennox–Gastaut syndrome) for patients who were taking cannabidiol 20 mg/kg or placebo and were or were not taking clobazam concurrently (ITT Analysis Set).

Adapted from Combined Clinical and Statistical Review, FDA Drug Approval Package: Epidiolex (Cannabidiol) [31].

vertical dashed line) was reduced in the group receiving cannabidiol in comparison with the group receiving placebo, which is the expected favorable response to the drug. By contrast, for patients not taking clobazam (Fig. 3, right panel), the number of patients exhibiting an increase in seizure frequency was similar (~32%) in the two treatment groups. Moreover, the degree of worsening was greater in the cannabidiol group as is evident from the crossing of the cumulative distribution curves at about $\geq 8\%$ seizure frequency reduction.

Increased drop seizures are concerning because these seizures subject patients to particularly high physical injury risk. Moreover, because uncontrolled or frequent seizures are a risk factor for sudden unexpected death in epilepsy (SUDEP) [36], the implications of seizure aggravation are especially ominous. Until further information is available, it would be prudent to limit the use of cannabidiol to adjunctive therapy in conjunction with clobazam.

166 Declaration of competing interest

167 Prior to the FDA approval of Epidiolex, the author participated in a
168 compensated one-day advisory meeting for Greenwich Biosciences.
169 There are no other relevant disclosures.

170 References

- 171 [1] Riss J, Cloyd J, Gates J, Collins S. Benzodiazepines in epilepsy: pharmacology and
172 pharmacokinetics. *Acta Neurol Scand* 2008;118(2):69–86. [https://doi.org/10.1111/](https://doi.org/10.1111/j.1600-0404.2008.01004.x)
173 [j.1600-0404.2008.01004.x](https://doi.org/10.1111/j.1600-0404.2008.01004.x).
174 [2] Gidal BE, Wechsler RT, Sankar R, Montouris GD, White HS, Cloyd JC, et al.
175 Deconstructing tolerance with clobazam: post hoc analyses from an open-label exten-
176 sion study. *Neurology* 2016;87(17):1806–12.
177 [3] Gauthier AC, Mattson RH. Clobazam: a safe, efficacious, and newly rediscovered
178 therapeutic for epilepsy. *CNS Neurosci Ther* 2015;21(7):543–8. [https://doi.org/10.](https://doi.org/10.1111/cns.12399)
179 [1111/cns.12399](https://doi.org/10.1111/cns.12399).
180 [4] Pernea M, Sutcliffe AG. Clobazam and its use in epilepsy. *Pediatr Rep* 2016;8(2):
181 6516. <https://doi.org/10.4081/pr.2016.6516>.
182 [5] Leahy JT, Chu-Shore CJ, Fisher JL. Clobazam as an adjunctive therapy in treating sei-
183 zures associated with Lennox–Gastaut syndrome. *Neuropsychiatr Dis Treat* 2011;7:
184 673–81. <https://doi.org/10.2147/NDT.S20173>.
185 [6] Ng YT, Conry JA, Drummond R, Stolle J, Weinberg MA, OV-1012 Study Investigators.
186 Randomized, phase III study results of clobazam in Lennox–Gastaut syndrome. *Neurol*
187 2011;77(15):1473–81. <https://doi.org/10.1212/WNL.0b013e318232de76>.
188 [7] Aras LM, Isla J, Mingorance-Le Meur A. The European patient with Dravet syndrome:
189 results from a parent-reported survey on antiepileptic drug use in the European
190 population with Dravet syndrome. *Epilepsy Behav* 2015;44:104–9. [https://doi.org/](https://doi.org/10.1016/j.yebeh.2014.12.028)
191 [10.1016/j.yebeh.2014.12.028](https://doi.org/10.1016/j.yebeh.2014.12.028).
192 [8] De Leon J, Spina E, Diaz FJ. Clobazam therapeutic drug monitoring: a comprehensive
193 review of the literature with proposals to improve future studies. *Ther Drug Monit*
194 2013;35(1):30–47. <https://doi.org/10.1097/FTD.0b013e31827ada88>.
195 [9] Fielding S, Hoffmann I. Pharmacology of anti-anxiety drugs with special reference to
196 clobazam. *Br J Clin Pharmacol* 1979;7(Suppl. 1):7S–15S.

- [10] Fisher JL. Interactions between modulators of the GABA_A receptor: stiripentol and
197 benzodiazepines. *Eur J Pharmacol* 2011;654(2):160–5. [https://doi.org/10.1016/j.](https://doi.org/10.1016/j.ejphar.2010.12.037)
198 [ejphar.2010.12.037](https://doi.org/10.1016/j.ejphar.2010.12.037).
199 [11] Hammer H, Ebert B, Jensen HS, Jensen AA. Functional characterization of the 1,5-
200 benzodiazepine clobazam and its major active metabolite N-desmethylclobazam
201 at human GABA_A receptors expressed in *Xenopus laevis* oocytes. *PLoS One* 2015;10
202 (3):e0120239. <https://doi.org/10.1371/journal.pone.0120239>.
203 [12] Ralvenius WT, Acuña MA, Benke D, Matthey A, Daali Y, Rudolph U, et al. The
204 clobazam metabolite N-desmethyl clobazam is an $\alpha 2$ preferring benzodiazepine
205 with an improved therapeutic window for antihyperalgesia. *Neuropharmacology*
206 2016;109:366–75. <https://doi.org/10.1016/j.neuropharm.2016.07.004>.
207 [13] Laux G, Koepfen D. Serum and cerebrospinal fluid concentration of clobazam and N-
208 desmethylclobazam. *Int J Clin Pharmacol Ther Toxicol* 1984;22(7):355–9.
209 [14] Boast CA, Gerhardt SC. Lack of tolerance or withdrawal effects in mice after chronic
210 administration of the non-sedating anxiolytic, CGS 9896. *Pharmacol Biochem Behav*
211 1987;26(3):601–6.
212 [15] Haigh JR, Feely M. RO 16-6028, a benzodiazepine receptor partial agonist, does not
213 exhibit anticonvulsant tolerance in mice. *Eur J Pharmacol* 1988;147(2):283–5.
214 [16] Rundfeldt C, Wlaż P, Hönack D, Löscher W. Anticonvulsant tolerance and withdrawal
215 characteristics of benzodiazepine receptor ligands in different seizure models in
216 mice. Comparison of diazepam, bretazenil and abecarnil. *J Pharmacol Exp Ther*
217 1995;275(2):693–702.
218 [17] Faulkner MA. Comprehensive overview: efficacy, tolerability, and cost-effectiveness
219 of clobazam in Lennox–Gastaut syndrome. *Ther Clin Risk Manag* 2015;11:905–14.
220 <https://doi.org/10.2147/TCRM.S55930>.
221 [18] Rosenberg HC, Tietz EI, Chiu TH. Tolerance to anticonvulsant effects of diazepam,
222 clonazepam, and clobazam in amygdala-kindled rats. *Epilepsia* 1989;30(3):276–85.
223 [19] Young NA, Lewis SJ, Harris QL, Jarrott B, Vajda FJ. Differences in the development of
224 tolerance to two anticonvulsant benzodiazepines in the amygdaloid kindled rat. *J*
225 *Pharm Pharmacol* 1988;40(5):365–7.
226 [20] Vajda FJ, Lewis SJ, Harris QL, Jarrott B, Young NA. Tolerance to the anticonvulsant ef-
227 fects of clonazepam and clobazam in the amygdaloid kindled rat. *Clin Exp Neurol*
228 1987;23:155–64.
229 [21] De Sarro G, Di Paola ED, Aguglia U, de Sarro A. Tolerance to anticonvulsant effects of
230 some benzodiazepines in genetically epilepsy prone rats. *Pharmacol Biochem Behav*
231 1996;55(1):39–48.
232 [22] Browne TR. Clonazepam. *N Engl J Med* 1978;299(15):812–6.
233 [23] Bang F, Birket-Smith E, Mikkelsen B. Clonazepam in the treatment of epilepsy. A clinical
234 long-term follow-up study. *Epilepsia* 1976;17(3):321–4.
235 [24] Geoffrey AL, Pollack SF, Bruno PL, Thiele EA. Drug–drug interaction between clobazam
236 and cannabidiol in children with refractory epilepsy. *Epilepsia* 2015;56(8):1246–51.
237 <https://doi.org/10.1111/epi.13060>.
238 [25] Morrison G, Crockett J, Blakey G, Sommerville K. A phase 1, open-label, pharmaco-
239 kinetic trial to investigate possible drug–drug interactions between clobazam,
240 stiripentol, or valproate and cannabidiol in healthy subjects. *Clin Pharmacol Drug*
241 *Dev* 2019. <https://doi.org/10.1002/cpdd.665> [Epub ahead of print].
242 [26] Devinsky O, Marsh E, Friedman D, Thiele E, Laux L, Sullivan J, et al. Cannabidiol in
243 patients with treatment-resistant epilepsy: an open-label interventional trial. *Lancet*
244 *Neurol* 2016;15(3):270–8. [https://doi.org/10.1016/S1474-4422\(15\)](https://doi.org/10.1016/S1474-4422(15)00379-8)
245 [00379-8](https://doi.org/10.1016/S1474-4422(15)00379-8).
246 [27] Hess EJ, Moody KA, Geoffrey AL, Pollack SF, Skirvin LA, Bruno PL, et al. Cannabidiol as a
247 new treatment for drug-resistant epilepsy in tuberous sclerosis complex. *Epilepsia*
248 2016;57(10):1617–24. <https://doi.org/10.1111/epi.13499>.
249 [28] Klein BD, Jacobson CA, Metcalf CS, Smith MD, Wilcox KS, Hampson AJ, et al. Evalua-
250 tion of cannabidiol in animal seizure models by the epilepsy therapy screening pro-
251 gram (ETSP). *Neurochem Res* 2017;42(7):1939–48. [https://doi.org/10.1007/](https://doi.org/10.1007/s11064-017-2287-8)
252 [s11064-017-2287-8](https://doi.org/10.1007/s11064-017-2287-8).

- 254 [29] Patra **PH**, Barker-Haliski **M**, White **HS**, Whalley **BJ**, Glyn **S**, Sandhu **H**, et al. Cannabidiol reduces seizures and associated behavioral comorbidities in a range of
255 animal seizure and epilepsy models. *Epilepsia* 2019;60(2):303–14. <https://doi.org/10.1111/epi.14629>.
256
257
258 [30] Gaston **TE**, Bebin **EM**, Cutter **GR**, Ampah **SB**, Liu **Y**, Grayson **LP**, et al. Drug-drug interactions with cannabidiol (CBD) appear to have no effect on treatment response in an
259 open-label Expanded Access Program. *Epilepsy Behav* 2019;98(Pt A):201–6. <https://doi.org/10.1016/j.yebeh.2019.07.008> [Epub ahead of print].
260
261
262 [31] FDA. Drug approval package: Epidiolex (Cannabidiol), NDA 210365, FDA Center for
263 Drug Evaluation and Research. . https://www.accessdata.fda.gov/drugsatfda_docs/nda/2018/210365Orig1s000TOC.cfm, Accessed date: 4 August 2019.
264
265 [32] Szaflarski **JP**, Hernando **K**, Bebin **EM**, Gaston **TE**, Grayson **LE**, Ampah **SB**, et al. Higher
266 cannabidiol plasma levels are associated with better seizure response following
267 treatment with a pharmaceutical grade cannabidiol. *Epilepsy Behav* 2019;95:
268 131–6. <https://doi.org/10.1016/j.yebeh.2019.03.042>.
269 [33] Genton P. When antiepileptic drugs aggravate epilepsy. *Brain Dev* 2000;22(2):
270 75–80.
271 [34] Sazgar **M**, Bourgeois **BF**. Aggravation of epilepsy by antiepileptic drugs. *Pediatr* 271
272 *Neurol* 2005;33(4):227–34.
273 [35] Gayatri **NA**, Livingston **JH**. Aggravation of epilepsy by anti-epileptic drugs. *Dev Med* 273
274 *Child Neurol* 2006;48(5):394–8.
275 [36] Devinsky O. Sudden, unexpected death in epilepsy. *N Engl J Med* 2011;365(19): 275
276 1801–11. <https://doi.org/10.1056/NEJMra1010481>.

Michael A. Rogawski **Q3 Q4**

Department of Neurology, School of Medicine, University of California, 278

Davis, Sacramento, CA 95817, USA. **Q5**

E-mail address: rogawski@ucdavis.edu 280

15 August 2019 281

Available online xxxx 282