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## To bear in Remembrance...

Whenever a theory appears to you as the only possible one, take this as a sign that you have neither understood the theory nor the problem which it was intended to solve. Karl R. Popper



Even though it's applied science we're dealin' with, it still is - science!



#### Leslie Z. Benet



# NCA vs. PK Modeling

#### Pharmacokinetic models

- Useful for understanding the drug/formulation
  - Study design of BA/BE, e.g., washout, accumulation / saturation to steady state

#### Drawbacks

- Almost impossible to validate (fine-tuning of side conditions, weighting schemes, software, …)
- Still a mixture of art and science
- Impossible to recalculate any given dataset using different software – sometimes even different versions of the same software!
- Not acceptable for evaluation of BE studies!

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# **PK Modeling: AUC**

Based on integration of a PK model;
 e.g., extravascular dose, one-compartment, no lag-time

$$C(t) = \frac{f \cdot D}{V} \frac{k_a}{k_a - k_{el}} \left( e^{k_{el}t} - e^{k_a t} \right)$$
$$AUC_{0-\infty} = \int_0^\infty C(t) dt = \frac{f \cdot D}{V} \frac{k_a}{k_a - k_{el}} \left( \frac{1}{k_{el}} - \frac{1}{k_a} \right) = \frac{f \cdot D}{V \cdot k_{el}} = \frac{f \cdot D}{CL}$$





# **NCA: Single Dose**

- Noncompartmental methods do not rely on a PK (=compartmental) model
- Also known as SHAM (Shape, Height, Area, Moments)
  - Metrics (plasma, single dose)
    - Extent of absorption (EU...), total exposure (US): AUC (Area Under the Curve)
    - Rate of absorption (EU...), peak exposure (US): C<sub>max</sub>
    - *t<sub>max</sub>* (EU…)
    - Early exposure (US, CAN): *pAUC*<sub>tmax</sub>; AUC truncated at population's (CAN: subject's) t<sub>max</sub> of the reference
    - Others:  $C_{min}$ , Fluctuation, *MRT*, Occupancy time,  $t_{lag}$ ,...



Since compartmental models not acceptable in BE, numeric approximation required
Linear trapezoidal rule<sup>1</sup>
Lin-log trapezoidal rule<sup>1,2</sup>
Lin-up/log-down trapezoidal rule
Cubic splines
Lagrange-polynomials
Simpson's rule

<sup>1</sup> Russian GL; only these two acceptable?

<sup>2</sup> WHO GL; only acceptable method?

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Log-linear trapezoidal rule
Assumes exponential elimination
Log-linear interpolation between data points
Only valid for iv administration; sections in absorption phase underestimated if applied to ev
If C = 0 or subsequent concentrations are equal, section calculated by linear trapezoidal

Total

$$AUC_{0-t_n} \approx \sum_{i=1}^{i=n-1} \frac{C_{i+1} - C_i}{\ln \frac{C_{i+1}}{C_i}} (t_{i+1} - t_i)$$

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 Lin-up/log-down trapezoidal rule Hybrid of linear and log-linear Sections with increasing or equal concentrations  $(C_{i+1} \ge C_i)$  calculated by linear trapezoidal rule Sections with decreasing concentrations  $(C_{i+1} < C_i)$  calculated by log-linear trapezoidal rule Avoids bias in both absorption and distribution/ elimination phases Suitable for iv and ev

Suitable for multiphasic profiles















 $\begin{array}{ccc} AUC_{R} & 697.8 \\ AUC_{T} & 662.9 \\ T/R & 95.00\% \end{array}$ linear trapezoidal  $T/R & 94.85\% \end{array}$ 

Model





# Example 1

AUCi (R) 693.7, AUCi (T) 658.0, T/R 94.9%, bias -0.16%



 AUC<sub>R</sub>
 697.8

 AUC<sub>T</sub>
 662.9

 T/R
 95.00%

 lin-up/log-down

 T/R
 94.89%

Model





 $\begin{array}{c} AUC_{R} & 697.8 \\ AUC_{T} & 662.9 \\ T/R & 95.00\% \end{array}$ **linear trapezoidal** 12 h (R) missing T/R & 92.53\% \end{array}

Model







Model  $AUC_R$  697.8  $AUC_T$  662.9 T/R 95.00% lin-up/log-down 12 h (R) missing T/R 94.89%





# Spaghetti & other pasta

linear trapezoidal Does the *semi-log plot* reflect the calculation of AUC?



#### Weired?

Overestimates AUC in the distribution/ elimination phase...







# Spaghetti & other pasta

lin-up/log-down Does the *linear plot* reflect the calculation of AUC?





semilogarithmic



Maybe we should change the way we draw spaghetti plots...



## Recommendations

- Don't exclude a subject if only a few data points are missing (loss of power)
  - Only if linear rule is required for any reason: data imputation

Linear within increasing/equal values  $(C_{i+1} \ge C_{i-1})$ 

$$\hat{C}_{i} = C_{i-1} + \left| \frac{t_{i} - t_{i-1}}{t_{i+1} - t_{i-1}} \right| \left( C_{i+1} - C_{i-1} \right)$$

Log-linear within decreasing values  $(C_{i+1} < C_{i-1})$  $\hat{C}_{i} = e^{\ln C_{i-1} + \left| \frac{t_i - t_{i-1}}{t_{i+1} - t_{i-1}} \right| \ln(C_{i-1}/C_{i+1})}$ 



## Recommendations

#### Don't exclude a subject ... (cont'd)

- Although I had never problems with this procedure in 500+ BE studies (stated in the protocol, according to SOP, and by validated software) data imputation may be unfamiliar to assessors
- Lin-up/log-down trapezoidal not affected by missing values and unbiased estimates are obtained





AUC<sub>0-∞</sub>
 Unweighted log-linear regression of ≥3 data points in the elimination phase
 Extrapolation from AUC<sub>0-t</sub> (regardless the method)
 AUC<sub>∞</sub> = AUC<sub>t</sub> + C<sub>t</sub>/λ or better AUC<sub>∞</sub> = AUC<sub>t</sub> + C<sub>t</sub>/λ





#### Single dose only!

- Method of estimation of  $\lambda_z$  stated in protocol!
  - One-compartment model: 'TTT'-method\* (Two times  $t_{max}$  to  $t_z$ )
  - Maximum adjusted R<sup>2</sup> (Phoenix/WinNonlin, Kinetica)

$$R_{adj}^2 = 1 - \frac{(1 - R^2) \cdot (n - 1)}{n - 2}$$

WinNonlin  $\leq$ 5.3: $C_{max}$  includedPhoenix/WNL  $\geq$ 6.0: $C_{max}$  excluded

Multi-compartment models: starting point = last inflection
 Minimum AIC: AIC = n · [ln(2 · π) + 1] + n · ln(RSS/n) + 2 · p
 Visual inspection of fit mandatory!

\* Scheerans C, Derendorf H, and C Kloft Proposal for a Standardised Identification of the Mono-Exponential Terminal Phase for Orally Administered Drugs Biopharm Drug Dispos 29, 145–57 (2008)





#### $\bullet AUC_{0-\infty}$ EMA (and all countires except US and Russia): No primary PK metric; but demonstrates that $AUC_{0-t}$ is a reliable estimate of extent of absorption (*i.e.*, extrapolated area $\leq 20\%$ of $AUC_{0-\infty}$ ) **–** FDA: Primary PK metric (additionally to $AUC_{0-t}$ ) • What if extrapolated $AUC_{0-t} > 20\%$ of $AUC_{0-\infty}$ in some subjects? EMA: Subjects should not be excluded, but requires discussion if observed in > 20% of cases

Russia: Use  $AUC_{0-\infty}$  instead of  $AUC_{0-t}$  as primary metric of the study





#### plasma profile (linear scale)







plasma profile (semilogarithmic scale)







# **NCA: other PK Metrics**

#### Single dose

- $\Box C_{max}$  and  $t_{max}$  directly from profile
- Metrics describing the shape of the profile
  - Early exposure (US, CAN): AUC<sub>tmax</sub> = pAUC truncated at population (CAN: subject's) t<sub>max</sub> of the reference
  - Biphasic MR formulations: *pAUCs* truncated at a prespecified cut-off time point
    - FDA: Product specific guidances (methylphenidate, zolpidem)
    - EMA: All products

Questions & Answers: positions on specific questions addressed to the pharmacokinetics working party

EMA/618604/2008 Rev. 4 (16 February 2012)

http://www.ema.europa.eu/docs/en\_GB/document\_library/Scientific\_guideline/2009/09/WC5 00002963.pdf





# **NCA: other PK Metrics**

#### Single dose

- Metrics describing the shape of the profile
  - $\blacksquare C_{max} / AUC$
  - $t_{75\%}$  (Plateau time: interval where  $C(t) \ge 75\%$  of  $C_{max}$ )\*
  - *HVD* (Half value duration: time interval where  $C(t) \ge 50\%$  of  $C_{max}$ )
  - Occupancy time,  $t \ge MIC$  (time interval where C(t) is above some limiting concentration)

\* Russia: mandatory for sustained release formulations





# **NCA: Urine**

Noncompartmental methods (cont'd)

- Extent of absorption (EU...), total exposure (US):  $Ae_t$  (cumulative amount excreted); rarely extrapolated to  $t = \infty$
- Rate of absorption, peak exposure (US):
  - $\Delta Ae_{max}, t\Delta Ae_{max}$
- **EMA:**  $C_{max}$ ,  $t_{max}$  from plasma!





# NCA (Methods)

#### Multiple dose

- Calculation of  $AUC_{\tau}$  (dosage interval  $\tau$ );  $AUC_{ss,24h}$  if more than *o.a.d.* and chronopharmacological variation)
- No extrapolation!

C<sub>ss,max</sub> and C<sub>ss,min</sub> directly from profile Peak-Trough-Fluctuation:  $(C_{ss,max} - C_{ss,min}) / C_{ss,av}$ , where  $C_{ss,av} = AUC_{\tau} / \tau$ Swing:  $(C_{ss,max} - C_{ss,min}) / C_{ss,min}$ 





# NCA (Methods)

#### Multiple dose

- Assessment whether steady state is reached (in a linear PK system:  $AUC_{\tau} = AUC_{\infty}$ )
  - No recommendations in GLs (except EU/US Veterinary)
  - Not required according to comments to EMA's BE-GL
  - MANOVA-model (sometimes in CAN, rarely used)
  - *t*-test of last two pre-dose concentrations
  - Hotelling's T<sup>2</sup>
  - Linear regression of last three pre-dose concentrations, individually for each subject/treatment
- Only the last method allows the exclusion of subjects being not in stead state. Other methods give only a yes no result!



NCA (Methods)

#### plasma profile (linear scale)







#### $\bullet C_{min}$ Defined by EMA as the concentration ( $C_{trough}$ ) at the end of the dosing interval $\tau$ Not implemented in PK software: C<sub>min</sub> global minimum concentration. Requires adaption. • More variable than $C_{max}$ (if little accumulation close to LLOQ) ■EMA requires pre-dose sampling at ≤–5 min and sampling at $\tau$ ±10 min Common in o.a.d. MD studies last sample at 23:55 in period 1 and at 24:00 in period 2...



- Missing last samples may lead to 'Apples-and-Oranges' statistics (biased treatment effect)
  If a reliable estimate of λ<sub>z</sub> is possible (≥3 data points), we can use an estimate
  ± shift of C<sub>z</sub> according to λ<sub>z</sub>\*
  Ĉ<sub>ssmin</sub> = C<sub>z</sub>e<sup>-λ̂<sub>z</sub>(τ-t<sub>z</sub>)</sup> (1)
  - or independent from measured  $C_z$

$$\hat{C}_{ss,min} = e^{\left(\hat{C}_0 - \hat{\lambda}_z \cdot (t_0 + \tau)\right)} \quad (2)$$

#### <sup>\*</sup> Gabrielsson J and D Weiner

*Pharmacokinetic & Pharmacodynamic Data Analysis: Concepts and Applications* Swedish Pharmaceutical Press, Stockholm, p163 (4<sup>th</sup> ed. 2006)



#### Missing values I

- Procedure for imputation must be stated in the protocol; recommended:
  - in the absorption phase (t < t<sub>max</sub>) by linear Interpolation of adjacent values
  - in the distribution/elimination phase ( $t \ge t_{max}$ ) by log/linear Interpolation of adjacent values
  - imputed value must not be used in estimating  $\lambda_z$ !
- Don't rely on softwares' defaults!
  - Phoenix/WinNonlin interpolates linear unless the lin-up/log-down trapezoidal method is used
  - Kinetica interpolates lin/log within descending values









 Missing values II Last value of T missing (e.g., vial broken)  $\blacksquare AUC_{tlast}$  (48) T = 2407  $AUC_{tlast}$  (72) R = 2984 T/R = 80.67% biased! Using AUC to t where C > LLOQ for both formulations (48)  $AUC_{48}$  T = 2534  $AUC_{48}$  R = 2407 T/R = 95% ✓ Not available in software Regulatory acceptance?

	Reference		Test	
time	conc	AUC <sub>0-t</sub>	conc	AUC <sub>0-t</sub>
0	BLQ	0	BLQ	0
0.25	28.57	4	27.14	3
0.50	48.57	13	46.14	13
0.75	62.50	27	59.38	26
1.00	72.15	44	68.55	42
1.5	83.26	83	79.10	79
2	88.14	126	83.73	119
3	90.14	215	85.63	204
4	88.70	304	84.26	289
6	84.07	477	79.86	453
9	77.11	719	73.25	683
12	70.71	940	67.18	893
16	63.00	1208	59.85	1147
24	50.00	1660	47.50	1577
36	35.36	2172	33.59	2063
48	25.00	2534	23.75	2407
72	12.50	2984	Missing	NA









#### Missing values II Last value of T missing (e.g., vial broken) Setting the first concentration in the profile where C<LLOQ to zero. $AUC_{all}$ , 'invented' by Pharsight $AUC_{all}$ (72) T = 2692 $AUC_{all}$ (72) R = 2984 T/R = 90.22% biased! > Available in Phoenix / WinNonlin, Kinetica

Regulatory acceptance?

	Reference		Test	
time	conc	AUC <sub>0-t</sub>	conc	AUC <sub>0-t</sub>
0	BLQ	0	BLQ	0
0.25	28.57	4	27.14	3
0.50	48.57	13	46.14	13
0.75	62.50	27	59.38	26
1.00	72.15	44	68.55	42
1.5	83.26	83	79.10	79
2	88.14	126	83.73	119
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16	63.00	1208	59.85	1147
24	50.00	1660	47.50	1577
36	35.36	2172	33.59	2063
48	25.00	2534	23.75	2407
72	12.50	2984	= *0	2692











# Missing values II Last value of T missing (e.g., vial broken) Estimating the missing value from elimination phase. AUC<sub>72\*</sub> T = 2835 AUC<sub>72</sub> R = 2984 T/R = 95% ✓ Not available in software

Regulatory acceptance ±

	Reference		Те	st
time	conc	AUC <sub>0-t</sub>	conc	AUC <sub>0-t</sub>
0	BLQ	0	BLQ	0
0.25	28.57	4	27.14	3
0.50	48.57	13	46.14	13
0.75	62.50	27	59.38	26
1.00	72.15	44	68.55	42
1.5	83.26	83	79.10	79
2	88.14	126	83.73	119
3	90.14	215	85.63	204
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24	50.00	1660	47.50	1577
36	35.36	2172	33.59	2063
48	25.00	2534	23.75	2407
72	12.50	2984	*11.88	*2835





#### Missing values II Values below the lower limit of quantitation (LLOQ) Example as before, but LLOQ = 12.5 (instead 10) $AUC_{72}$ : T = ?, R = 2984 T/R = ? $AUC_{48}$ : T = 2407, R = 2534 T/R = 95% ✓ $AUC_{all}$ : T = 2692, R = 2984 T/R = 90.22% biased! *AUC*<sub>72\*</sub>: T = ?, R = 2984 T/R = ?

	Reference		Test	
time	conc	AUC <sub>0-t</sub>	conc	AUC <sub>0-t</sub>
24	50.00	1660	47.50	1577
36	35.36	2172	33.59	2063
48	25.00	2534	23.75	2407
72	12.50	2984	BLQ	NA

	Reference		Test	
time	conc	AUC <sub>0-t</sub>	conc	AUC <sub>0-t</sub>
24	50.00	1660	47.50	1577
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	Reference		Test		
time	conc	AUC <sub>0-t</sub>	conc	AUC <sub>0-t</sub>	
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48	25.00	2534	23.75	2407	
72	12.50	2984	*11.88	NA	







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- •With *any* [*sic*] given sampling scheme the *'true'* C<sub>max</sub> is missed
  - It is extremely unlikely that we sample exactly at the true C<sub>max</sub> for any given subject
  - High inter- and/or intra-subject variability (single point metric)
  - Variability higher than AUC's
  - In many studies the win/loose metric!
  - Try to decrease variability
    - Increase sample size (more subjects)
    - Increase sampling within each subject (maybe better)

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Quote from the literature: *C<sub>max</sub> was observed within two to five hours after oral administration*...
Elimination is drug specific,
but what about absorption?
Formulation specific!
Dependent on the sampling schedule (in a strict sense study-specific)













#### •EMA GL on BE (2010)

Section 4.1.8 Reasons for exclusion 1)

A subject with lack of any measurable concentrations or only very low plasma concentrations for reference medicinal product. A subject is considered to have very low plasma concentrations if its AUC is less than 5% of reference medicinal product geometric mean AUC (which should be calculated without inclusion of data from the outlying subject). The exclusion of data [...] will only be accepted in exceptional cases and may question the validity of the trial.

#### Remark: Only possible after unblinding!





#### •EMA GL on BE (2010)

Section 4.1.8 Resons for exclusion 1) cont'd

The above can, for immediate release formulations, be the result of subject non-compliance [...] and should as far as possible be avoided by mouth check of subjects after intake of study medication to ensure the subjects have swallowed the study medication [...]. The samples from subjects excluded from the statistical analysis should still be assayed and the results listed.





#### Gastro-resistant (enteric coated) preparations

- Gastric emptying of single unit dosage forms nondisintegrating in the stomach is prolonged and highly erratic. The consequences of this effect on the enteric coating of delayed release formulations are largely unpredictable.
  - Sampling period should be designed such that measurable concentrations are obtained, taking into consideration not only the half-life of the drug but the possible occurrence of this effect as well. This should reduce the risk of obtaining incomplete concentration-time profiles due to delay to the most possible extent. These effects are highly dependent on individual behaviour.

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#### Gastro-resistant (enteric coated) preparations

Therefore, but only under the conditions that sampling times are designed to identify very delayed absorption and that the incidence of this outlier behaviour is observed with a comparable frequency in both, test and reference products, these incomplete profiles can be excluded from statistical analysis provided that it has been considered in the study protocol.

EMEA, CHMP (EWP-PK)

*Questions & Answers: positions on specific questions addressed to the pharmacokinetics working party* 

EMA/618604/2008 Rev. 4 (16 February 2012)

http://www.ema.europa.eu/docs/en\_GB/document\_library/Scientific\_guideline/2009/09/WC500002 963.pdf

What is *'comparable'*? For a study in 24 subjects, we get a significant difference for 5/0 (Fisher's exact test: *p* 0.0496).



# t<sub>lag</sub> – a 'nasty' PK Metric

- Only relevant for delayed release (gastric resistant) formulations
- Highly variable mainly not due to the formulation but the intrinsic variability in gastric emptying
- Less variability for multiparticulate formulations than for monolithic ones, but still problematic
- Sampling schedule difficult to design
- Assessment (descriptive vs. nonparametric)?



# t<sub>lag</sub> – a 'nasty' PK Metric

- Little is published about calculation; five methods assessed\*
- •Commercial software (Phoenix/WinNonlin, Kinetica) treat  $t_{lag}$  as the time point prior to the first measurable (non-zero) concentration

 Other methods require programming skills; some of them might be judged by assessors already borderline PK models (?!)

\* Csizmadia F and L Endrenyi

*Model-Independent Estimation of Lag Times with First-Order Absorption and Disposition* J Pharmaceut Sci 87(5), 608–12 (1998)





# t<sub>lag</sub> – a 'nasty' PK Metric

- Is t<sub>lag</sub> really clinically relevant even for formulations where rapid onset of effects is of importance?
- If two formulations follow identical pharmacokinetics except  $t_{lag}$ , this difference is reflected in  $t_{max}$  as well (both in SD and MD)









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# t<sub>lag</sub> vs. t<sub>max</sub>

•Simulation of steady state ( $\tau$  24 h; 6 d  $\approx$  20× $t_{1/2}$ ) •Formulations differ in  $t_{lag}$  only!



■ *t<sub>lag</sub>* is discriminatory: R T - R + 3Might be difficult to measure; frequent sampling required Nonparametric statistics (EMA!)





# t<sub>lag</sub> vs. t<sub>max</sub>

•Simulation of steady state ( $\tau$  24 h; 6 d  $\approx$  20× $t_{1/2}$ ) •Formulations differ in  $t_{lag}$  only! Surrogate possible?



*t<sub>max</sub>* is discriminatory as well: T 14.1 R 11.1 T – R +3

 Maybe better; frequent sampling in the area of *C<sub>max</sub>* common

 Nonparametric statistics (EMA!)





# Case Study (PPI 1) Attempt to deal with high variability

Powered to 90% according to CV from previous studies; 140 (!) subjects and to 80% for expected dropout rate. Sampling every 30 min up to 14 hours (7,785 total)



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### Submission in China

 Company's defending argument:highly variable GI-transit manifested in t<sub>lag</sub>

•Let's see...



















#### Assessment

Although there was no significant difference in  $t_{lag}$ , the 'corrected'  $t_{max} - t_{lag}$ was significantly delayed Variability of the test formulation was higher It seems that the company's assumption does not hold – formulations differ







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## Half lives

•Drug specific, *but*...

- The apparent elimination represents the slowest rate constant (controlled release, topicals, transdermals) – not necessarily elimination!
- Avoid the term 'terminal elimination' might not be true
- Important in designing studies
  - To meet  $AUC_t \ge 80\% AUC_{\infty}$  criterion
  - To plan sufficiently long wash-out (avoid carry–over)
  - To plan saturation phase for steady state





## **Half lives**

Dealing with literature data

- What if only mean ±SD is given?
  - Assuming normal distribution:  $\mu \pm \sigma$  covers 68.27% of values (15.87% of values are expected to lie outside of  $\mu \pm \sigma$ )
  - Example: 8.5 ± 2.4 hours, 36 subjects.
     0.1587 × 36 = 5.71 or in at least five subjects we may expect a half life of > 10.9 hours.

Plan for 95% coverage ( $z_{0.95} = 1.96$ ):  $p_{0.95} = \mu \pm z_{0.95} \times \sigma$ 8.5 ± 1.96 × 2.4 = [3.80, 13.2] hours. We may expect a half life of >13.2 hours in ~one subject

( $0.05/2 \times 36 = 0.90$ ).



## Half lives



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## Thank You! Pharmacokinetic Analysis of BE Data Open Questions?



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# To bear in Remembrance...

The fundamental cause of trouble in the world today is that the stupid are cocksure while the intelligent are full of doubt. *Bertrand Russell* 





It is a good morning exercise for a research scientist to discard a pet hypothesis every day before breakfast. It keeps him young. *Konrad Lorenz* 

Rabindranath Tagore

If you shut your door to all errors truth will be shut out.

