



NDA 17-090/S-074, 18-012/S-027, 18-013/S-058, 19-906/S-034

Tyco Healthcare Group LP  
c/o Mallinckrodt Inc.  
Attention: Marianne Robb, Official Correspondent  
675 McDonnell Blvd.  
P.O. Box 5840  
St. Louis, MO 63134

Dear Ms. Robb:

We acknowledge receipt of your supplemental new drug applications submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Tofranil-PM (imipramine pamoate) 75 mg, 100 mg, 125 mg, and 150 mg Capsules (NDA 17-090) dated May 29, 2007, Pamelor (nortriptyline HCl) 10 mg/5 ml Solution (NDA 18-012) dated May 24, 2007, Pamelor (nortriptyline HCl) 10 mg, 25 mg, 50 mg, and 75 mg Capsules (NDA 18-013) dated May 24, 2007, and Anafranil (clomipramine hydrochloride) 25 mg, 50 mg, and 75 mg capsules (NDA 19-906) dated May 29, 2007.

We additionally refer to an Agency letter dated May 1, 2007, requesting revisions to your prescriber labeling and Medication Guide based upon the December 13, 2006 meeting of the Psychopharmacologic Drugs and Advisory Committee.

Reference is also made to an e-mail communication from the Agency dated June 21, 2007, requesting additional revisions to the labeling, and your e-mail dated June 29, 2007 accepting these changes.

These new drug applications, submitted under "Changes Being Effected" provide for the following revisions to labeling:

1. Revisions to the Black Box entitled **Suicidality and Antidepressant Drugs** at the beginning of the prescriber labeling.
2. Revisions to the **WARNINGS-Clinical Worsening and Suicide Risk** section.
3. Revisions to the **PRECAUTIONS-Information for Patients** section.
4. Revisions to the **MEDICATION GUIDE**.

We have completed our review of these applications, and they are approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

Within 21 days of the date of this letter, submit content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at <http://www.fda.gov/oc/datacouncil/spl.html>, that is identical in content to the enclosed labeling text. Upon receipt, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate

this submission “SPL for approved supplements 17-090/S-074, 18-012/S-027, 18-013/S-058, & 19-906/S-034.”

We expect that the revised labeling would be available on your website within 10 days of receipt of this letter and that it would accompany any newly shipped product in a reasonable amount of time. Drug product already in distribution with currently approved labeling may remain in distribution.

Failure to make these changes within the specified period of time could make your product misbranded under 21 USC 321(n) and 352(a).

If you issue a letter communicating important information about this drug product (i.e., a “Dear Health Care Professional” letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH  
Food and Drug Administration  
5515 Security Lane  
HFD-001, Suite 5100  
Rockville, MD 20852

In addition, the Division of Drug Marketing, Advertising, and Communications (DDMAC) has reviewed the revised product labeling -----

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We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Renmeet Grewal, Pharm. D., Regulatory Project Manager, at (301) 796-1080 or Bill Bender, Regulatory Project Manager, at 301-796-2145.

Sincerely,

*{See appended electronic signature page}*

Thomas Laughren, M.D.  
Director  
Division of Psychiatry Products  
Office of Drug Evaluation I  
Center for Drug Evaluation and Research

Enclosure

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**This is a representation of an electronic record that was signed electronically and  
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/s/

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Thomas Laughren  
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