



NDA 21-753

Galderma Laboratories  
Attn: Christine Shank  
Sr. Director, Regulatory Submissions  
14501 North Freeway  
Fort Worth, Texas 76177

Dear Ms. Shank:

Please refer to your new drug application (NDA) dated March 31, 2004, received April 1, 2004, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Differin, (adapalene gel), 0.3%.

We acknowledge receipt of your submission(s) dated May 25, June 9, 11, 25, July 13, August 16, 18, December 21, 2004, February 28, May 5, August 17, September 16, November 10, 2005, May 22, December 18, 2006, January 11 and 24, February 2 (two), March 22 and 28, May 4, June 6, and 11, 2007.

The December 18, 2006, submission constituted a complete response to our February 1, 2005, action letter.

This new drug application provides for a new dosage strength of Differin (adapalene gel), 0.3%.

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

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert, text for the patient package insert, immediate container and carton labels). Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

The final printed labeling (FPL) must be identical to enclosed labeling (text for the package insert, immediate container and carton labels). Marketing the product before making the revisions, exactly as stated, in the product's labeling may render the product misbranded and an unapproved new drug.

Please submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Individually mount 15 of the copies on heavy-weight paper or similar material. Alternatively, you may submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA*. For administrative purposes, designate this submission "**FPL for approved NDA 21-753.**" Approval of this submission by FDA is not required before the labeling is used.

We remind you of your postmarketing study commitment in your submission dated June 11, 2007. These commitments are listed below.

Description of Commitment:

The Applicant will conduct a post-marketing pharmacokinetic study. The study will include at least 18 evaluable subjects in the case of a cross-over study (if a parallel design is used then 18 evaluable subjects per treatment arm is required) to compare the systemic exposure of Differin ( adapalene) Gel, 0.1% and Differin (adapalene) Gel, 0.3% under maximal usage conditions, i.e., with a dose that would cover as large a body surface area as possible of diseased skin consistent with the proposed labeling, using the most current sensitive analytical method.

Protocol Submission:	by October 1, 2007
Study Start:	declared on submission of the protocol
Final Report Submission:	by December 31, 2008

In addition, the applicant agrees to continue monitoring and reporting of spontaneously reported adapalene-exposed pregnancies, both foreign and domestic, for a period of at least 3 years post-approval in the periodic and annual reports.

Submit clinical protocols to your IND for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all study final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii), you should include a status summary of each commitment in your annual report to this NDA. 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, number of patients entered into each study. All submissions, including supplements, relating to these postmarketing study commitments must be prominently labeled **“Postmarketing Study Commitment Protocol”**, **“Postmarketing Study Commitment Final Report”**, or **“Postmarketing Study Commitment Correspondence.”**

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this division and two copies of both the promotional materials and the package insert directly to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Drug Marketing, Advertising, and Communications  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

Please submit one market package of the drug product when it is available.

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/s/

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Susan Walker  
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