



NDA 022483/S-003

SUPPLEMENT APPROVAL

Graceway Pharmaceuticals, LLC
Attention: Sean Brennan, Ph.D.
Sr. Vice President, Regulatory Affairs
340 Martin Luther King Jr. Blvd.
Bristol, TN 37620

Dear Dr. Brennan:

Please refer to your Supplemental New Drug Application (sNDA) dated September 17, 2010, received September 17, 2010, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Zyclara (imiquimod) Cream, 2.5%.

We acknowledge receipt of your amendments dated November 3 and December 2, 2010, January 19, February 4 and 22, April 18, 26, July 7, 13, 14, and 15, 2011.

This supplemental new drug application proposes the following:

1. 2.5% imiquimod cream for the topical treatment of clinically typical visible or palpable actinic keratoses of the face or balding scalp in immunocompetent adults,
2. [REDACTED] (b) (4)
3. [REDACTED] (b) (4)

For administrative purposes, we have separated the proposed additions into the following supplements:

- S-003 – 2.5% imiquimod cream for the topical treatment of clinically typical visible or palpable actinic keratoses of the face or balding scalp in immunocompetent adults
- [REDACTED] (b) (4)
- [REDACTED] (b) (4)

The subject of this action letter is NDA 022483/S-003. [REDACTED] (b) (4)

We have completed our review of NDA 022483/S-003, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), 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), with the addition of any labeling changes in pending “Changes Being Effected” (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

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/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and container labels that are identical to the enclosed carton and immediate container labels except with the revisions listed below, as soon as they are available, but no more than 30 days after they are printed.

Packet Label:

1. Revise the route of administration and warning statements as follows so that they are consistent with the statements on the wallet and sleeve:

For Topical Use Only
Not for Ophthalmic, Oral or Intravaginal Use

2. Delete the statement (b) (4).”
3. Decrease the size of the net quantity statement.

Sleeve:

4. Show the intended location of the lot number and expiration date.

Please submit these labels electronically according to the guidance for industry titled “Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008).” Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission “**Product Correspondence – Final Printed Carton and Container Labels for approved NDA 022483/S-003.**” 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.

We are waiving the pediatric study requirement for this application because necessary studies are impossible or highly impracticable because there are too few children with the disease/condition to study.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) 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

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at <http://www.fda.gov/opacom/morechoices/fdaforms/cder.html>; instructions are provided on page 2 of the form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

REPORTING REQUIREMENTS

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 Cristina Attinello, Regulatory Project Manager, at (301) 796-3986.

Sincerely,

{See appended electronic signature page}

Susan J. Walker, M.D., F.A.A.D.
Director
Division of Dermatology and Dental Products
Office of Drug Evaluation III
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/

SUSAN J WALKER
07/15/2011