

Food and Drug Administration Rockville, MD 20857

ANDA 078004

Roxane Laboratories, Inc. Attention: Randall S. Wilson V.P., Scientific, Medical and Regulatory Affairs 1809 Wilson Road Columbus, OH 43228

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) dated November 23, 2005, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Clopidogrel Tablets USP, 75 mg.

Reference is also made to the tentative approval letter issued by this office on September 26, 2007; and to your amendments dated September 24, 2010; February 4, and December 20, 2011; and January 31, February 22, March 12, March 13, March 28, April 20, and May 14, 2012.

We have completed the review of this ANDA and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the ANDA is approved, effective on the date of this letter. The Division of Bioequivalence has determined your Clopidogrel Tablets USP, 75 mg, to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug (RLD), Plavix Tablets, 75 mg, of Sanofi Aventis U.S. LLC (Sanofi). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your ANDA.

The RLD upon which you have based your ANDA, Sanofi's Plavix Tablets, 75 mg, is subject to periods of patent protection. As noted in the agency's publication titled <u>Approved Drug</u> <u>Products with Therapeutic Equivalence Evaluations</u> (the "Orange Book"), U.S. Patent Nos. 6,429,210 (the '210 patent) and 6,504,030 (the '030 patent) expire on December 10, 2019 (with pediatric exclusivity added). Your ANDA contains paragraph IV certifications under section 505(j)(2)(A)(vii)(IV) of the Act stating that each of these patents is invalid, unenforceable, or will not be infringed by your manufacture, use, or sale of Clopidogrel Tablets USP, 75 mg under this ANDA. You have notified the agency that Roxane Laboratories, Inc. (Roxane) complied with the requirements of section 505(j)(2)(B) of the Act, and that no action for infringement of either patent was brought against Roxane.

Under section 506A of the Act, certain changes in the conditions described in this ANDA require an approved supplemental application before the change may be made.

Please note that if FDA requires a Risk Evaluation & Mitigation Strategy (REMS) for a listed drug, an ANDA citing that listed drug also will be required to have a REMS. See section 505-1(i) of the Act.

Postmarketing reporting requirements for this ANDA are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

Promotional materials may be submitted to FDA for comment prior to publication or dissemination. Please note that these submissions are voluntary. If you desire comments on proposed launch promotional materials with respect to compliance with applicable regulatory requirements, we recommend you submit, in draft or mock-up form, two copies of both the promotional materials and package insert directly to:

Food and Drug Administration Center for Drug Evaluation and Research Office of Prescription Drug Promotion 5901-B Ammendale Road Beltsville, MD 20705

We call your attention to 21 CFR 314.81(b)(3) which requires that all promotional materials be submitted to the Office of Prescription Drug Promotion with a completed Form FDA 2253 at the time of their initial use.

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(1)] in structured product labeling (SPL) format, as

described at

http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLab eling/default.htm, that is identical in content to the approved labeling (including the package insert, and any patient package insert and/or Medication Guide that may be required). 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/DrugsGuidanceComplianceRegulatoryInf ormation/Guidances/U CM072392.pdf. The SPL will be accessible via publicly available labeling repositories.

Sincerely yours,

{See appended electronic signature page}

Keith Webber, Ph.D. Deputy Director Office of Pharmaceutical Science Center for Drug Evaluation and Research

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/s/

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ROBERT L WEST 05/17/2012 Deputy Director, Office of Generic Drugs for Keith Webber, Ph.D.