



ANDA 202461

Dr. Reddy's Laboratories, Inc.  
U.S. Agent for: Dr. Reddy's Laboratories Limited  
Attention: Lee C. Banks  
V.P., Intellectual Property and Regulatory Affairs  
200 Somerset Corporate Blvd., 7th Floor  
Bridgewater, NJ 08807

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) dated November 5, 2010, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Naproxen and Esomeprazole Magnesium Delayed-release Tablets, 500 mg/20 mg (base) and 375 mg/20 mg (base).

Reference is made to the tentative approval letter issued by this office on August 12, 2013, and to your amendments dated August 23, and September 19, 2013.

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 Naproxen and Esomeprazole Magnesium Delayed-release Tablets, 500 mg/20 mg (base) and 375 mg/20 mg (base), to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug (RLD), Vimovo Delayed-release Tablets, 500 mg/20 mg (base) and 375 mg/20 mg (base), respectively, of AstraZeneca LP (AstraZeneca).

Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your ANDA. The "interim" dissolution specifications are as follows:

	Naproxen		Esomeprazole
	Acid stage	Buffer stage	Buffer stage only
USP Apparatus	II (Paddle) with sinkers		
Speed	75 rpm		
Medium (at	0.1 M HCl	0.05 phosphate	0.05 phosphate

<b>37°C)</b>		buffer, pH 7.4	buffer, pH 7.4
<b>Volume</b>	475 mL	900 mL	900 mL
<b>Time</b>	120 min	90 min	90 min
<b>Specification</b>	NMT (b)(4) in 120 in	NLT (b)(4) (Q) in 45 min	NLT (b)(4) (Q) in 45 min

The "interim" dissolution test(s) and tolerances should be finalized by submitting dissolution data from the first three production size batches. These data should be submitted as a "Special Supplement - Changes Being Effected" if there are no revisions to be made to the "interim" specifications, or if the final specifications are tighter than the "interim" specifications. In all other instances, the information should be submitted in the form of a Prior Approval Supplement.

The reference listed drug (RLD) upon which you have based your ANDA, AstraZeneca's Vimovo Delayed-release Tablets, is subject to periods of patent protection. The following patents and their expiration dates are currently listed in the agency's publication titled Approved Drug Products with Therapeutic Equivalence Evaluations (the "Orange Book"):

<u>U.S. Patent Number</u>	<u>Expiration Date</u>
5,714,504 (the '504 patent)	August 3, 2015*
5,900,424 (the '424 patent)	November 4, 2016*
6,369,085 (the '085 patent)	November 25, 2018*
6,875,872 (the '872 patent)	November 27, 2014*
6,926,907 (the '907 patent)	February 28, 2023
7,411,070 (the '070 patent)	November 25, 2018*
7,745,466 (the '466 patent)	October 13, 2018

\*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 Naproxen and Esomeprazole Magnesium Delayed-release Tablets, 500 mg/20 mg (base) and 375 mg/20 mg (base), under this ANDA. You have notified the agency that Dr. Reddy's Laboratories Limited (DRL) complied with the requirements of section 505(j)(2)(B) of the Act, and that litigation for infringement of the '504, '085, '872, '907, '070, and '466 patents was brought against DRL within the statutory 45-day period in the United States District Court for the New Jersey [Astra Zeneca LP, and Pozen Inc. v. Dr. Reddy's Laboratories Ltd., Civil Action No. 3:13-cv-00091]. You also notified the agency that litigation concerning patents '504, '085, '872, '070, '466 was dismissed. The litigation concerning

the '907 patent remains ongoing, however, the 30-month period identified in section 505(j)(5)(B)(iii) of the Act, during which time FDA was precluded from approving your ANDA, has expired.

With respect to 180-day generic drug exclusivity, we note that DRL was the first ANDA applicant to submit a substantially complete ANDA with a paragraph IV certification for Naproxen and Esomeprazole Magnesium Delayed-release Tablets, 500 mg/20 mg (base) and 375 mg/20 mg (base). Therefore, with this approval, DRL is eligible for 180 days of generic drug exclusivity for Naproxen and Esomeprazole Magnesium Delayed-release Tablets, 500 mg/20 mg (base) and 375 mg/20 mg (base). This exclusivity, which is provided for under section 505(j)(5)(B)(iv) of the Act, will begin to run from the date of the commercial marketing identified in section 505(j)(5)(B)(iv). Please submit correspondence to this ANDA informing the agency of the date the exclusivity begins to run.

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.

The Generic Drug User Fee Amendments of 2012 (GDUFA) (Public Law 112-144, Title III) established certain provisions with respect to self-identification of facilities and payment of annual facility fees. Your ANDA identifies at least one facility that is subject to the self-identification requirement and payment of an annual facility fee. Self-identification must occur by June 1 of each year for the next fiscal year. Facility fees must be paid each year by the date specified in the Federal Register notice announcing facility fee amounts. All finished dosage forms (FDFs) or active pharmaceutical ingredients (APIs) manufactured in a facility that has not met its obligations to self-identify or to pay fees when they are due will be deemed misbranded. This means that it will be a violation of federal law to ship these products in interstate commerce or to import them into the United States. Such violations can result in prosecution of those responsible, injunctions, or seizures of misbranded products. Products misbranded because of failure to self-identify or pay facility fees are subject to being denied entry into the United States.

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/StructuredProductLabeling/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/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

Sincerely yours,

*{See appended electronic signature page}*

Kathleen Uhl, M.D.  
Acting Director  
Office of Generic Drugs  
Center for Drug Evaluation and Research

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**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
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/s/  
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ROBERT L WEST

09/27/2013

Deputy Director, Office of Generic Drugs, for  
Kathleen Uhl, M.D.