



NDA 200796/S-005
NDA 202331/S-005

SUPPLEMENT APPROVAL

Arbor Pharmaceuticals LLC
Attention: Ms. Allison Lowry
Director, Regulatory Affairs
6 Concourse Parkway
Suite 1800
Atlanta, GA 30328

Dear Ms. Lowry:

Please refer to your Supplemental New Drug Applications (sNDAs) dated December 23, 2013 and received December 24, 2013, submitted under section 505(b)(1) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Edarbi (azilsartan medoxomil) 40 mg and 80 mg Tablets (NDA 200796) and Edaryclor (azilsartan medoxomil and chlorthalidone) 40 mg/12.5 mg and 40/25 mg Tablets (NDA 202331).

These supplemental new drug applications provide for labeling revised as follows (additions are marked as underlined text and deletions are marked as ~~striketrough text~~):

For NDA 200796:

1. In **HIGHLIGHTS/RECENT MAJOR CHANGES**, the following text was deleted:

~~RECENT MAJOR CHANGES~~

~~Boxed Warning 11/2011~~
~~Contraindications (4) 10/2012~~
~~Warnings and Precautions~~
~~Fetal Toxicity (5.1) 11/2011~~

2. Under **ADVERSE REACTIONS**, a new section was added:

6.3 Postmarketing Experience

The following adverse reactions have been identified during the postmarketing use of EDARBI. Because these reactions are reported voluntarily from a population of uncertain size, it is not always possible to reliably estimate their frequency or establish a causal relationship to drug exposure.

- Nausea
- Muscle spasms
- Rash
- Pruritus
- Angioedema

3. The corresponding heading “Postmarketing Experience” was added to the Table of Contents

4. Also noted throughout the label are numerous editorial revisions:

- The applicant name and contact information (telephone number and address) was updated to reflect the transfer of ownership to Arbor Pharmaceuticals
- The Boxed Warning was reformatted
- The Fetal Toxicity (5.1) section was reformatted
- The NDC numbers were updated
- The manufacturing information was updated to reflect the transfer of ownership to Arbor Pharmaceuticals

5. The revision date and version number were updated.

There are no other changes from the last approved package insert.

For NDA 202331:

6. In **HIGHLIGHTS/RECENT MAJOR CHANGES**, the following text was deleted:

~~————— **RECENT MAJOR CHANGES** —————
Contraindications (4) ————— 10/2012~~

7. The **CONTRAINDICATIONS** section was re-formatted.

8. Under **ADVERSE REACTIONS**, a new section was added:

6.2 Postmarketing Experience

The following adverse reactions have been identified during the postmarketing use of EDARBYCLOR. Because these reactions are reported voluntarily from a population of uncertain size, it is not always possible to reliably estimate their frequency or establish a causal relationship to drug exposure.

- Nausea
- Rash
- Pruritus
- Angioedema

9. The corresponding heading “Postmarketing Experience” was added to the Table of Contents

10. Also noted throughout the label are numerous editorial revisions:

- The applicant name and contact information (telephone number and address) was updated to reflect the transfer of ownership to Arbor Pharmaceuticals
- The Boxed Warning was reformatted
- The Fetal Toxicity (5.1) section was reformatted
- The NDC numbers were updated

- The manufacturing information was updated to reflect the transfer of ownership to Arbor Pharmaceuticals

11. The revision date and version number were updated.

There are no other changes from the last approved package insert.

We have completed our review of these supplemental applications, and they are 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), 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).

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>.

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety information that appears in the revised package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the address above or by fax to 301-847-8444.

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, please call:

Lori Anne Wachter, RN, BSN
Regulatory Project Manager for Safety
(301) 796-3975

Sincerely,

{See appended electronic signature page}

Mary Ross Southworth, PharmD.
Deputy Director for Safety
Division of Cardiovascular and Renal Products
Office of Drug Evaluation 1
Center for Drug Evaluation and Research

ENCLOSURE:
Content of Labeling

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

MARY R SOUTHWORTH
04/18/2014