

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 76-699

ADMINISTRATIVE DOCUMENTS

Telecon Record

Date: April 18, 2003

ANDA: 76-699

Firm: Schwarz

Drug: Carbidopa and Levodopa ODT, 10/100 mg, 25/100 mg and 25/250 mg

FDA Participants: Martin Shimer

Industry Participants: Gary Wieczorek

Phone #: (262) 237-5171

Agenda: Marty called and asked that Gary provide engineers drawings for the 100 cc and 250 cc bottles, Q1 and Q2 breakdown for Artificial mint flavor, and a form 3454 with the appropriate box demarcated. As it turns out the form 3454 that was submitted was complete and did not need to be resubmitted.

April 18, 2003: Mr. Wieczorek initially faxed in a relative% breakdown of the mint flavor at Marty's request in the hope that this would be enough info to justify the flavor. Marty called Mr. Wieczorek back, after some research, and informed him that it would be necessary to provide a further breakdown of the _____ and _____ components. Mr. Wieczorek agreed to provide the info or have the vendor — supply the info directly to FDA if necessary

**APPEARS THIS WAY
ON ORIGINAL**

RECORD OF TELEPHONE CONVERSATION

<p>The firm was contacted today to request updated data on stability specifications for the finished product based on the bio dissolution specifications of not less than — % (Q) of the labeled amounts of carbidopa and levodopa dissolved in 10 minutes. Also, the firm was requested to provide stability data on the dissolution tests for 12 tabs of an aged sample. The firm indicated that will submit the information as a telephone amendment and fax copies of the data to both PM and CMC reviewer.</p> <p style="text-align: center;">APPEARS THIS WAY ON ORIGINAL</p>	DATE:
	19-Jul-2004
	ANDA NUMBER
	76-699
	TELECON INITIATED BY AGENCY
	PRODUCT NAME:
	Parcopa® (Carbidopa- Levodopa ODT)
	FIRM NAME:
	Schwarz Pharma, Inc.
FIRM REPRESENTATIVES:	
Harold Steltzer Gary M. Wieczorek	
TELEPHONE NUMBER:	
(262) 238-0957	
FDA REPRESENTATIVES	
Y.Kong B.Arnwine	
SIGNATURES:	
	

Orig: ANDA 76-693

V:\firmsnz\schwarz\telecons\76693July 18.04.doc

OGD APPROVAL ROUTING SUMMARY

ANDA # 76-699 Applicant Schwartz Pharma
 Drug Carbidopa and Levodopa orally Disintegrating Tabs Strength(s) 10mg/100mg, 25mg/100mg, 25mg/250mg
 APPROVAL TENTATIVE APPROVAL SUPPLEMENTAL APPROVAL (NEW STRENGTH) OTHER

REVIEWER:

1. Martin Shimer
 Chief, Reg. Support Branch

DRAFT Package
 Date 30 Jul 2004
 Initials MS

FINAL Package
 Date 8/25/04
 Initials RW/for

Contains GDEA certification: Yes No

Determ. of Involvement? Yes No

Patent/Exclusivity Certification: Yes No

Pediatric Exclusivity System
 RLD = N/A
 Date Checked N/A

If Para. IV Certification- did applicant Notify patent holder/NDA holder Yes No

Nothing Submitted
 Written request issued

Was applicant sued w/in 45 days Yes No

Study Submitted
 Date settled:

Has case been settled: Yes No

Is applicant eligible for 180 day Generic Drugs Exclusivity for each strength: Yes No

Type of Letter: no patents/exclusivities ∴ eligible for Full Approval

Comments:

2. Project Manager, YKong Team 7
 Review Support Branch

Date 7/28/04
 Initials YK

Date 8-17-04
 Initials YK

Original Rec'd date Mar 27, 2003
 Date Acceptable for Filing March 31, 2003
 Patent Certification (type) I
 Date Patent/Exclus. expires _____

EER Status Pending Acceptable OAI
 Date of EER Status 7/28/04 (8/4/04)
 Date of Office Bio Review 7/28/04 (ORANGE FOLDER)
 Date of Labeling Approv. Sum 7/9/04
 Date of Sterility Assur. App. N/A

Citizens' Petition/Legal Case Yes No
 (If YES, attach email from PM to CP coord)

Methods Val. Samples Pending Yes No

First Generic Yes No

MV Commitment Rcd. from Firm Yes No

Acceptable Bio reviews tabbed Yes No

Modified-release dosage form: Yes No

Suitability Petition/Pediatric Waiver

Interim Dissol. Specs in AP Ltr: Yes

Pediatric Waiver Request Accepted Rejected Pending

Previously reviewed and tentatively approved

Date _____

Previously reviewed and CGMP def. /NA Minor issued

Date _____

Comments:

3. David Read (PP IVs Only) Pre-MMA Language included
 OGD Regulatory Counsel, Post-MMA Language Included
 Comments:

Date _____
 Initials _____

N/A

4. Div. Dir./Deputy Dir.
 Chemistry Div. I (II) OR III
 Comments:

Date 8/26/04
 Initials RCA

- CMC OK.
- Proposed disintegration specification limit of _____
- Dr. Holcombe to evaluate the acceptability of this specification limit?

RCA

REVIEWER:

FINAL ACTION

5. Frank Holcombe First Generics Only Date _____
Assoc. Dir. For Chemistry Initials _____

Comments: (First generic drug review)

N/A. The office has reviewed multiple ANDAs for orally disintegrating tablets, especially ANDA 76-693 (Ondansetron) reviewed by the same team as this ANDA. OLC review states that disintegration specification is acceptable.

6. Vacant RLD-Sinemet Tablets 10mg/100mg, 25mg/100mg, 25mg/250mg Date _____
Deputy Dir., DLPS Bristol Myers Squibb Pharma Co. NDA 17-555 Initials _____

7. Peter Rickman Director, DLPS Date 8/27/04 Initials PR

Para. IV Patent Cert: Yes No ; Pending Legal Action: Yes No ; Petition: Yes No

Comments: *Acceptable. E2S dated 8/4/04 (verified 8/27/04). No OAT Alerts noted. Bioequivalence study (posting) on 25mg/250mg strength found acceptable. Dissolution testing on all 3 strengths found acceptable. Waivers granted to 10mg/100mg and 25mg/100mg strengths under 21 CFR 320.22(d)(2). Bio test sites have acceptable O2U inspectional histories. Office level bio enclosed 7/28/04. Office level bio FPL found acceptable 7/19/04. Proprietary name "Parcopa" found acceptable to DMETS. CRC found acceptable for approval 8/10/04. Methods validation will not be requested.*

8. Robert L. West Deputy Director, OGD Date 8/27/04 Initials RLW

Para. IV Patent Cert: Yes No Pending Legal Action: Yes No Petition: Yes No

Comments: *This ANDA is based upon an approved ANDA Suitability Petition (028-0033/CP) permitting the applicant to submit this ANDA for a change in dosage form from the RLD, i.e. from a tablet to an orally disintegrating tablet. There are no unexpired patents or exclusivities listed in the Orange Book for this drug product.*

9. Gary Buehler Director, OGD Date _____
Comments: For Orally Disintegrating Tablets Initials _____
First Generic Approval PD or Clinical for BE Special Scientific or Reg. Issue

10. Project Manager, Team Yoon Kong Date 8/27/04
Review Support Branch Initials YK

Date PETS checked for first generic drug (just prior to notification to firm)

Applicant notification: 1:41p Time notified of approval by phone 1:50p Time approval letter faxed

FDA Notification: 8/27/04 Date e-mail message sent to "CDER-OGDAPPROVALS" distribution list.

8/27/04 Date Approval letter copied to \\CDS014\DRUGAPP\ directory.

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 76-699

CORRESPONDENCE

SCHWARZ P H A R M A

April 25, 2003

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

NEW CORRESP
NC

Re: **ANDA 76-699**
PARCOPA™
(Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)

Amendment 001 – CMC
Packaging and Raw Material Additional Information

Dear Sir/Madam:

Reference is made to the telephone discussions on April 18, 2003 between Martin Shimer, Project Manager for the Office of Generic Drugs, and Gary Wiczorek, Regulatory Affairs Manager for Schwarz Pharma, Inc. (SPInc), in which the Agency requested engineering drawings for the 100 cc and 250 cc bottles and additional information on the mint flavor ingredient described in the application.

SPInc herein submits the following information:

- Engineering drawings from the bottle supplier, _____ for the 100 cc and 250 cc bottles.
- A fax from the mint flavor supplier, _____
- A fax from _____ previously sent to Mr. Shimer on April 18, 2003.

This statement will certify that a true and complete copy of this amendment is being sent to the Minneapolis District Office of the Food and Drug Administration. If there are any questions or comments concerning this submission, please contact Gary Wiczorek, Regulatory Affairs Manager, at 262-238-5171.

Sincerely,

SCHWARZ PHARMA, INC.
Gary M. Wiczorek for
Donna K. Multhauf
Director
Regulatory Affairs and Quality Assurance

RECEIVED

APR 28 2003

OGD / CDER

ANDA 76-699

cc: DUP/Jacket
Division File
Field Copy
HFD-610/R.West
HFD-610/P.Rickman
HFD-92
HFD-615/M.Bennett
HFD-600/

Endorsement: HFD-615/GDavis, Chief, RSB *[Signature]* 29-APR-2003 date
HFD-615/MShimer, CSO *[Signature]* 29 April 2003 date
Word File V:Firmsnz/Schwarz/Dtss&rev/76699.ack
F/T EEH 04/29/03
ANDA Acknowledgment Letter!

**APPEARS THIS WAY
ON ORIGINAL**

MINOR AMENDMENT

ANDA 76-699

OFFICE OF GENERIC DRUGS, CDER, FDA
Document Control Room, Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773 (301-594-0320)

SEP 12 2003



APPLICANT: Schwarz Pharma, Inc.

TEL: 262-238-5171

ATTN: Donna K. Multauf

FAX: 262-238-0957

FROM: Nicole Park

PROJECT MANAGER: 301-827-5849

Dear Madam:

This facsimile is in reference to your abbreviated new drug application dated March 28, 2003, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Carbidopa and Levodopa Orally Disintegrating Tablets, 10 mg/100 mg, 25 mg/100 mg, and 25 mg/250 mg.

The application is deficient and, therefore, Not Approvable under Section 505 of the Act for the reasons provided in the attachments (3 pages). This facsimile is to be regarded as an official FDA communication and unless requested, a hard copy will not be mailed.

The file on this application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw the application. Your amendment should respond to all of the deficiencies listed. Facsimiles or partial replies will not be considered for review, nor will the review clock be reactivated until all deficiencies have been addressed. The response to this facsimile will be considered to represent a MINOR AMENDMENT and will be reviewed according to current OGD policies and procedures. The designation as a MINOR AMENDMENT should appear prominently in your cover letter. You will be notified in a separate communication from our Division of Bioequivalence of any deficiencies identified during our review of your bioequivalence data. If you have substantial disagreement with our reasons for not approving this application, you may request an opportunity for a hearing.

SPECIAL INSTRUCTIONS:

THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.

If received by someone other than the addressee or a person authorized to deliver this document to the addressee, you are hereby notified that any disclosure, dissemination, copying, or other action to the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us by mail at the above address.

27

Redacted 2 page(s)

of trade secret and/or

confidential commercial

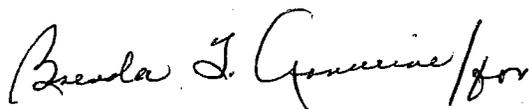
information from

9/12/2003 FDA FAX

for Unknown Impurities as well as Total Impurities. This should be in addition to a Known Impurity limit also. Please submit a test method and specification for impurity testing of this drug product.

- B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:
1. The bioequivalence review comments are provided to you under separate cover. If the Office of Bioequivalence recommends a different Dissolution test and specification for the drug product from the one proposed in this application, please revise the Dissolution testing method and specification for the finished drug products release and stability protocols accordingly and resubmit the comparative dissolution profile data if necessary.
 2. Since this drug product is non-compendial, you should be aware that methods validation by the FDA field laboratory must be performed on the drug product methods. Since we have requested that you submit a specification on release and stability for impurity testing of the drug product, we will postpone submitting the methods at this time to the district. Please submit an impurities test method with reasonable specifications for this drug product.

Sincerely yours,



Florence S. Fang
Director
Division of Chemistry II
Office of Generic Drugs
Center for Drug Evaluation and Research

NAT
MAM
10/10/03

SCHWARZ
P H A R M A

September 17, 2003

NEW CORRESP

NC

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs (HFD-600)
Metro Park North II
Document Control Room 150
7500 Standish Place
Rockville, MD 20855-2773

RE: **ANDA 76-699**
PARCOPA™
(Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)

General Correspondence – Intent to Amend (Chemistry Deficiencies)

Dear Sir/Madam:

Reference is made to the above-listed ANDA and the Office of Generic Drugs (OGD) deficiency letter dated and received on September 12, 2003, regarding chemistry deficiencies. Pursuant to 21 CFR § 314.120, Schwarz Pharma, Inc. notifies OGD of its intent to amend the application to address the noted deficiencies.

If there are any questions or comments concerning this submission, please contact Gary M. Wieczorek, Regulatory Affairs Manager, at 262-238-5171.

Sincerely,

SCHWARZ PHARMA, INC.



Donna K. Multhauf
Director
Regulatory Affairs and Quality Assurance

RECEIVED

SEP 22 2003

OGD/CDER

NC
10/10/03

March 8, 2004

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

ORIG AMENDMENT

N/AM

Re: **ANDA 76-699**
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)

Amendment 002: MINOR AMENDMENT - Responses to Chemistry Minor
Deficiencies Letter, Revised Specifications and Methods, 12 Month CRT Stability
Update

Dear Sir/Madam:

Reference is made to the above-mentioned ANDA and the Chemistry Minor Deficiencies Letter received by fax from the Office of Generic Drugs on September 12, 2003.

Schwarz Pharma, Inc. (SPInc) herein submits the responses and supporting documentation to the nine items noted in the deficiencies letter. A copy of the deficiencies letter is included with the responses.

Also included in this amendment are the following:

- A summary of the specifications and methods that have been added or revised since submission of the ANDA, as well as the added/revised specifications and methods.
- Updated stability reports RA-2003-184 and RA-2003-185, reflecting 12 months of controlled room temperature data for product stored in blisters and bottles.

This statement will certify that a full and complete copy of the Chemistry, Manufacturing & Controls section of this application has been forwarded to the Minneapolis District Office of the Food and Drug Administration.

If there are any questions regarding this submission, please contact Gary Wiczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.

Gary M. Wiczorek for

Donna K. Multhauf
Director
Regulatory Affairs

RECEIVED

MAR 09 2004

OGD/CDER

April 12, 2004

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

ORIG AMENDMENT

NIAF

**Re: ANDA 76-699
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)**

Amendment 003: Response to Labeling Deficiency Letter

Dear Sir/Madam:

Reference is made to ANDA 76-699 for PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets); the labeling deficiency letter for ANDA 76-699, faxed to Schwarz Pharma, Inc. (SPInc) on August 11, 2003; and the March 19, 2004 telephone conversation between Lillie Golson, Office of Generic Drugs (OGD) Labeling Team Leader, and Donna Multhauf, Director of Regulatory Affairs for SPInc, regarding a deficiency letter received for another SPInc application currently under review with OGD (ANDA _____).

A copy of the August 11, 2003 deficiency letter for ANDA 76-699 is included in this submission. In response to this letter, SPInc herein submits hard copies of the revised PI, container labels (100's); blisters, sample cartons (6's), and sample displays (30's). All deficiencies noted in the letter have been addressed. This submission consists of one volume. In accordance with the *Organization of an ANDA* guidance, dated February, 1999, to meet the requirement for providing four copies of draft labeling, SPInc is submitting four copies of this volume. Also included in the submission are side-by-side comparisons for each labeling piece, comparing the proposed labeling to what was submitted in the original ANDA. As noted in these side-by-side comparisons, color has been added, where appropriate, to help differentiate the strengths, and promotional statements have been added to the sample cartons (6's). In the March 19, 2004 telephone conversation, SPInc presented its position about the use of promotional material on the sample cartons for _____. It was noted that SPInc's strategy is to promote and sample a family of products that use the orally disintegrating tablet technology, and that consistent labeling would be used for each of the products. These products have or will be submitted as 505(b)(2) applications or ANDAs. One of these products, KEMSTRO™ (Baclofen Orally Disintegrating Tablets), has already been approved as a 505(b)(2) application (NDA 21-589); and as noted above, PARCOPA™ and _____ are pending review as ANDAs. Copies of the sample cartons (6's) for KEMSTRO™ and _____ are also included in this submission, to show the similarities of the sample carton labeling being used for SPInc's family of orally disintegrating tablet products. A desk copy of this submission is also being sent to Lillie Golson, based on a request she made during the March 19, 2004 telephone conversation.

RECEIVED

APR 13 2004

OGD / CDER

ANDA 76-699
Amendment 003
April 12, 2004
Page 2 of 2

SCHWARZ

PHARMA

If there are any questions regarding this submission, please contact Gary Wiczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.

Gary M. Wiczorek For

Donna K. Multhauf
Director
Regulatory Affairs

**APPEARS THIS WAY
ON ORIGINAL**

April 15, 2004

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

ORIGINAL AMENDMENT

N/AM

**Re: ANDA 76-699
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)**

**Amendment 001 to Amendment 002: MINOR AMENDMENT
Revised Specification, Method, Method Validation Report, and Impurities Data;
Unknown Impurities Report; 18 Month CRT Stability Update**

Dear Sir/Madam:

Reference is made to the above-mentioned ANDA, the Chemistry Minor Deficiencies Letter received by fax from the Office of Generic Drugs on September 12, 2003, and Amendment 002, submitted by Schwarz Pharma, Inc. (SPInc) to the Agency on March 8, 2004.

In Amendment 002, SPInc submitted responses and supporting documentation to the nine items noted in the deficiencies letter. The amendment also included specifications and methods that were revised since the submission of the ANDA and updated stability reports reflecting 12 months of controlled room temperature data for drug product stored in blisters and bottles.

SPInc herein submits Amendment 001 to Amendment 002 to address changes/updates made since the March 8, 2004 submission. The following documents are included in this submission:

- An introduction to describe the reasons for the document revisions
- A revised specification for the Carbidopa drug substance (PRM-0473-04)
- A revised analytical procedure for the Carbidopa drug substance (APRM-0473-03)
- A revised analytical method validation report for the drug product (RA-2004-041, rev. 1)
- Revised impurities data tables for the drug product
- A status report from _____ on the identification of unknown drug product impurities
- Updated stability reports reflecting 18 months of controlled room temperature data for drug product stored in blisters and bottles (RA-2004-039 and RA-2004-040)

This statement will certify that a full and complete copy of the Chemistry, Manufacturing & Controls section of this submission has been forwarded to the Minneapolis District Office of the Food and Drug Administration.

RECEIVED

APR 16 2004

CCT / 10-11

Amendment 001 to Amendment 002 of ANDA 76-699
April 15, 2004
Page 2 of 2

SCHWARZ
PHARMA

If there are any questions regarding this submission, please contact Gary Wiczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.

Gary M. Wiczorek For

Donna K. Multhauf
Director
Regulatory Affairs

**APPEARS THIS WAY
ON ORIGINAL**

BIOEQUIVALENCY AMENDMENT

ANDA 76-699

OFFICE OF GENERIC DRUGS, CDER, FDA
Document Control Room, Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773 (301-594-0320)

MAY - 4 2004-



APPLICANT: Schwarz Pharma, Inc.

TEL: 262-238-5171

ATTN: Donna K. Multhauf

FAX: 262-238-0957

FROM: Beth Fabian-Fritsch 

PROJECT MANAGER: (301) 827-5847

Dear Madam:

This facsimile is in reference to the bioequivalency data submitted on March 28, 2003, pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Carbidopa and Levodopa Orally Disintegrating Tablets, 10 mg/100 mg, 25 mg/100 mg, and 25 mg/250 mg.

The Division of Bioequivalence has completed its review of the submission(s) referenced above and has identified deficiencies which are presented on the attached 2 pages. This facsimile is to be regarded as an official FDA communication and unless requested, a hard-copy will not be mailed.

You should submit a response to these deficiencies in accord with 21 CFR 314.96. Your amendment should respond to all the deficiencies listed. **Facsimiles or partial replies will not be considered for review**, nor will the review clock be reactivated until all deficiencies have been addressed. Your cover letter should clearly indicate that the response is a "Bioequivalency Amendment" and clearly identify any new studies (i.e., fasting, fed, multiple dose, dissolution data, waiver or dissolution waiver) that might be included for each strength. We also request that you include a copy of this communication with your response. **Please submit a copy of your amendment in both an archival (blue) and a review (orange) jacket.** Please direct any questions concerning this communication to the project manager identified above.

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MAY 04 2004

BIOEQUIVALENCE DEFICIENCIES

ANDA: 76-699

APPLICANT: Schwarz Pharma, Inc.

DRUG PRODUCT: Carbidopa and Levodopa Orally Disintegrating Tablets
10 mg/100 mg, 25 mg/100 mg, & 25 mg/250 mg

The Division of Bioequivalence has completed its review of your submission(s) acknowledged on the cover sheet. The following deficiencies have been identified:

1. Your dissolution testing is incomplete. Please conduct comparative dissolution testing on all strengths in 750 mL of 0.1 N HCl at 37°C using USP apparatus 1 (basket) at 25 rpm and 50 rpm. Also, please conduct additional comparative dissolution testing on all strengths in 750 mL of 0.1 N HCl at 37°C using USP apparatus 2 (paddle) at 25 rpm. The recommended sampling times are 2.5, 5, 10 and 30 minutes.
2. You did not submit 20% of serially selected chromatograms. Please submit them. Refer to the Guidance for Industry Bioanalytical Method Validation issued in May 2001.
3. You submitted a listing of SOPs used in your analytical work on the bioequivalence study, but none of them contained effective dates and none addressed repeat assays. Please submit a complete list of all analytical SOPs used in the bioequivalence studies including those that describe objective criteria for identifying and re-assaying samples believed to have anomalous pharmacokinetic results. Please include the dates on which all SOPs were implemented. Actual copies of SOPs for repeat assays should be submitted.
4. Please submit a complete tabular summary on any repeat assays, including (1) the reason(s) for re-assay, (2) the original and re-assayed values of the involved samples, (3) identification of which value was selected for PK analysis and (4) the associated subjects, treatments, and sampling times.
5. In the current submission the plasma concentration data for all subjects was presented in one column.

In future submissions please submit your pharmacokinetic data on a diskette or CD in SAS Transport format in two separate files as described below:

- (1) SUBJ SEQ PER TRT AUCT AUCI CMAX TMAX KE THalf
- (2) SUBJ SEQ PER TRT C1 C2 C3 Cn

Separate each field with a blank space and indicate missing values with a period (.).

Sincerely yours,

for 

Dale P. Conner, Pharm.D.

Director, Division of Bioequivalence

Office of Generic Drugs

Center for Drug Evaluation and Research

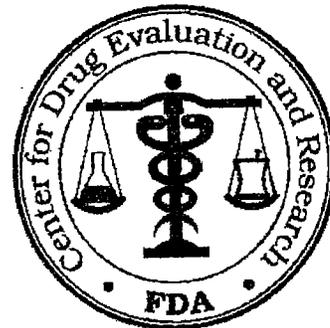
**APPEARS THIS WAY
ON ORIGINAL**

Carbidopa and Levodopa Orally Disintegrating Tablets, ANDA: 76-699

MINOR AMENDMENT

ANDA 76-699

OFFICE OF GENERIC DRUGS, CDER, FDA
Document Control Room, Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773 (301-594-0320)



MAY 14 2004

APPLICANT: Schwarz Pharma, Inc.

TEL: 262-238-5171

ATTN: Donna Multhauf

FAX: 262-238-0957

FROM: Nicole Lee

PROJECT MANAGER: (301) 827-5849

Dear Madam:

This facsimile is in reference to your abbreviated new drug application dated March 28, 2003, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Carbidopa and Levodopa Orally Disintegrating Tablets, 10 mg/100 mg, 25 mg/100 mg, and 25 mg/250 mg.

Reference is also made to your amendment(s) dated: March 8, April 12 and April 15, 2004.

The application is deficient and, therefore, Not Approvable under Section 505 of the Act for the reasons provided in the attachments (2 pages). This facsimile is to be regarded as an official FDA communication and unless requested, a hard copy will not be mailed.

The file on this application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw the application. Your amendment should respond to all of the deficiencies listed. Facsimiles or partial replies will not be considered for review, nor will the review clock be reactivated until all deficiencies have been addressed. The response to this facsimile will be considered to represent a MINOR AMENDMENT and will be reviewed according to current OGD policies and procedures. The designation as a MINOR AMENDMENT should appear prominently in your cover letter. You have been/will be notified in a separate communication from our Division of Bioequivalence of any deficiencies identified during our review of your bioequivalence data. If you have substantial disagreement with our reasons for not approving this application, you may request an opportunity for a hearing.

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M

Redacted 2 page(s)

of trade secret and/or

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information from

5/14/2004 FDA FAX

ORIGINAL

SCHWARZ
P H A R M A

May 19, 2004

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

ORIG AMENDMENT

N/AB

**Re: ANDA 76-699
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)**

**Amendment 004: Bioequivalency Amendment
Dissolution Data**

Dear Sir/Madam:

Reference is made to the above-mentioned ANDA and the bioequivalence deficiencies letter dated May 4, 2004, received by fax from the Office of Generic Drugs on May 6, 2004.

Pursuant to 21 CFR § 314.96, Schwarz Pharma, Inc. (SPInc) herein submits responses to the five items noted in the bioequivalence deficiencies letter, including new dissolution data as requested by the Agency. A copy of the bioequivalence deficiencies letter is also included.

If there are any questions regarding this submission, please contact Gary Wieczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.

Gary M. Wieczorek For

Donna K. Multhauf
Director
Regulatory Affairs

RECEIVED
MAY 20 2004
OGD/CDER

ORIGINAL

SCHWARZ
P H A R M A

June 4, 2004

Food and Drug Administration
 Center for Drug Evaluation and Research
 Office of Generic Drugs
 Metro Park North II
 7500 Standish Place, Room 150
 Rockville, MD 20855-2773

ORIG AMENDMENT
 N/AM

Re: **ANDA 76-699**
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)

Amendment 005: MINOR AMENDMENT –
Responses to Chemistry Minor Deficiency Letter
Secondary Packaging Site Information
Dissolution Data

Dear Sir/Madam:

Reference is made to the above-mentioned ANDA; the May 4, 2004 Bioequivalence Deficiency Letter; the Chemistry Minor Deficiency Letter received by fax from the Office of Generic Drugs (OGD) on May 14, 2004; the telephone discussion on May 18, 2004 between Nicole Lee, OGD Project Manager, Dr. Bernard, OGD Review Chemist, and Gary M. Wieczorek, Schwarz Pharma, Inc. (SPInc) Regulatory Affairs Manager; and Amendment 004 to the ANDA, submitted by SPInc on May 19, 2004.

In the May 14, 2004 Chemistry Minor Deficiency Letter, the Agency identified eight deficiencies. In the telephone discussion on May 18, 2004, SPInc asked for clarification for deficiency Item 4, regarding the reporting of hardness values in kp units. Dr. Bernard clarified that she wanted to see the hardness data presented in the ANDA and subsequent amendments reported in kp units, but she was not requiring SPInc to change specifications or master batch records so that hardness values would be routinely reported in kp units.

SPInc herein submits the responses and supporting documentation to the eight items noted in the deficiencies letter. A copy of the deficiency letter is included with the responses. Also included in this amendment are cGMP and Debarment statements from _____ who will be performing secondary packaging and labeling for the Carbidopa-Levodopa Orally Disintegrating Tablets blister packaging configurations.

In the above-mentioned May 4 Bioequivalence Deficiency Letter, the Agency requested in Item 1 additional dissolution information from SPInc. In response, SPInc submitted Amendment 004, which included a report describing additional dissolution testing performed on all strengths of Carbidopa-Levodopa Orally Disintegrating Tablets in 750 mL of 0.1 N HCl at 37°C, using USP apparatus 2 (paddle) at 25 rpm. Copies of this report and the deficiency letter are also included in this submission, since the report was not submitted as part of the original ANDA.

RECEIVED

JUN 07 2004

OGD/CDEh

This statement will certify that a full and complete copy of the Chemistry, Manufacturing and Controls section of this amendment has been forwarded to the Minneapolis District Office of the Food and Drug Administration.

If there are any questions regarding this submission, please contact Gary M. Wieczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.



Donna K. Multhauf
Director
Regulatory Affairs

**APPEARS THIS WAY
ON ORIGINAL**

Fax Cover Sheet

Department of Health and Human Services
Public Health Service
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Rockville, Maryland 20855

To: Donna K. Multhauf

DATE: May 21, 2004

Phone: 262-238-5171

Fax: 262-238-0957

SUBJECT: Labeling Comments for ANDA 76-699

From: Koung Lee

Phone: (301) 827-5846

Fax: (301) 443-3847

Number of Pages: 2
(Including Cover Sheet)

Comments:

*This document is intended only for the use of the party to whom it is addressed and may contain information that is privileged, confidential, and protected from disclosure under applicable law. If you are not the addressee, or a person authorized to deliver the document to the addressee, this communication is not authorized. If you have received this document in error, immediately notify us by telephone and return it to us at the above address by mail. Thank you.

REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH

ANDA Number: 76-699

Date of Submission: April 12, 2004

Applicant's Name: Schwarz Pharma

Est. Name: Carbidopa and Levodopa Orally Disintegrating Tablets, 10 mg/100 mg, 25 mg/100 mg, & 25 mg/ 250 mg

Labeling Deficiencies:

1. GENERAL

We have resubmitted your proposed proprietary name, PARCOPA™, to the Division of Medication Errors and Technical Support (DMETS), Office of Drug Safety for final review. We defer final comment on your proposed name until it has been finalized by DMETS.

2. CARTON (6)

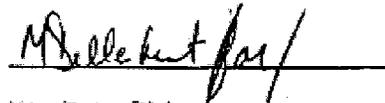
- a. Revise " _____ " to read "For the treatment of the symptoms of idiopathic Parkinson's disease (paralysis agitans), postencephalitic parkinsonism, and symptomatic parkinsonism which may follow injury to the nervous system by carbon monoxide intoxication and/or manganese intoxication."
- b. The package insert labeling does not include statements to support " _____ " therefore this statement should be deleted.
- c. Replace " _____ " and " _____ " with "• Disintegrates on the tongue-without water" and "Disintegrates on the tongue", respectively.

Please revise your labeling as instructed above and submit 12 final printed copies of labels and labeling for a full approval of this application.

Prior to approval, it may be necessary to revise your labeling subsequent to approved changes for the reference listed drug. In order to keep ANDA labeling current, we suggest that you subscribe to the daily or weekly updates of new documents posted on the CDER web site at the following address -

<http://www.fda.gov/cder/cdernew/listserv.html>

To facilitate review of your next submission, and in accordance with 21 CFR 314.94(a)(8)(iv), please provide a side-by-side comparison of your proposed labeling with your last submission with all differences annotated and explained.



Wm Peter Rickman
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

June 18, 2004

OFFICE OF GENERIC DRUGS
Center for Drug Evaluation and Research
Food and Drug Administration
MPN2, HFD-600
7500 Standish Place, Room 150
Rockville, MD 20855

ORIG AMENDMENT

N/AF

Re: ANDA 76-699
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)

Amendment 006: Response to Labeling Deficiency Letter - FPL

Dear Sir/Madam:

Reference is made to the above-mentioned ANDA; Amendment 003, submitted on April 12, 2004; the Labeling Deficiency Letter received by fax on May 21, 2004; and the voice mail messages on May 28, 2004 and June 1, 2004 between Koung Lee, Office of Generic Drugs (OGD) Labeling Reviewer and Gary M. Wieczorek, Schwarz Pharma, Inc. (SPInc) Regulatory Affairs Manager.

In the May 21, 2004 Labeling Deficiency Letter, the Agency requested that revisions be made to the sample blister carton (6's) labels and that 12 final printed copies of labels and labeling be submitted for a full approval of this application. A copy of the deficiency letter is included in this submission. In the May 28, 2004 voice mail message, SPInc asked if it would be acceptable to submit the final printed labeling (FPL) electronically, in lieu of 12 hard copies. In the June 1, 2004 voice mail message, the Agency agreed that the FPL could be submitted electronically.

Schwarz Pharma, Inc. (SPInc) herein submits FPL in electronic format, in accordance with the *Providing Regulatory Submissions in Electronic Format - ANDAs* guidance dated June 2002. The electronic submission is virus free as Symantec AntiVirus Corporate Edition, version 06/16/2004 rev. 35 was used to check the files for viruses.

The FPL consists of the following components:

- package insert (PC4578)
- 10 mg/100 mg trade label (L4569); 10 mg/100 mg blister card (BU334106); 10 mg/100 mg sample blister carton (6's) (CR4570); 10 mg/100 mg sample display carton (30's) (CR4571)
- 25 mg/100 mg trade label (L4572); 25 mg/100 mg blister card (BU334206); 25 mg/100 mg sample blister carton (6's) (CR4573); 25 mg/100 mg sample display carton (30's) (CR4574)
- 25 mg/250 mg trade label (L4575); 25 mg/250 mg blister card (BU334306); 25 mg/250 mg sample blister carton (6's) (CR4576); 25 mg/250 mg sample display carton (30's) (CR4577).

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SPInc has incorporated the sample blister carton (6's) changes requested by the Agency in the May 21, 2004 Labeling Deficiency Letter for deficiency items 2b and 2c. For deficiency item 2a, SPInc has decided to remove the indication statement from the front panel of the sample blister carton (6's). Side-by-side comparisons for the sample blister cartons (6's) are included in this submission, in electronic format, comparing the proposed labeling to what was submitted in Amendment 003. The remaining labeling components are the same as what was submitted in Amendment 003. As requested by the Agency in the June 1, 2004 voice mail message, an MS Word version of the package insert is also included in this submission as a review aid.

If there are any questions regarding this submission, please contact Gary M. Wieczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.

Gary M. Wieczorek for

Donna K. Multhauf
Director
Regulatory Affairs

**APPEARS THIS WAY
ON ORIGINAL**

July 12, 2004

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

ORIG AMENDMENT

N/AM

**Re: ANDA 76-699
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablet),
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg**

**Amendment 001 to Amendment 005: MINOR AMENDMENT-CMC
Change in Friability Limit in the Drug Product Stability Specification and
Stability Protocol**

Dear Sir/Madam:

Reference is made to the above-mentioned ANDA; the Chemistry Minor Deficiency Letter received by fax from the Office of Generic Drugs (OGD) on May 14, 2004; Amendment 005 submitted by Schwarz Pharma, Inc. (SPInc) on June 4, 2004 to address the chemistry minor deficiencies; and the telephone discussion on July 9, 2004 between Nicole Lee, OGD Project Manager, and Gary M. Wieczorek, SPInc Regulatory Affairs Manager.

In the May 14, 2004 Chemistry Minor Deficiency Letter, the Agency recommended that SPInc incorporate friability testing to the stability protocol (Item 7). SPInc responded to this request in Amendment 005 by incorporating a friability test into the stability protocol, the drug product release specifications, and the drug product stability specifications. The friability limit for in-process, release, and stability testing proposed by SPInc for the 10 mg/100 mg and 25 mg/100 mg tablets was NMT -%. In the telephone discussion on July 9, 2004, SPInc notified the Agency that the limit in the stability protocol and stability specification for the 10 mg/100 mg and 25 mg/100 mg tablets would have to be changed from NMT -% to NMT -%, based on the results of the friability testing performed at the 24 month time point for the registration lots.

SPInc herein submits this amendment to amendment 005 to change the friability limit in the drug product stability protocol and drug product stability specification for the 10 mg/100 mg and 25 mg/100 mg tablets. The limit has been changed from NMT -% to NMT -%. A revised stability protocol is included in this amendment to reflect the change. The drug product stability specifications for the 10 mg/100 mg and 25 mg/100 mg tablets will also be revised to reflect these changes, and the revised specifications will be submitted in the first annual report. Please note that the friability limit for the in-process and release testing for these two strengths will remain at NMT -%.

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JUL 13 2004
OGD / CDER

This statement will certify that a full and complete copy of the Chemistry, Manufacturing and Controls section of this amendment has been forwarded to the Minneapolis District Office of the Food and Drug Administration.

If there are any questions regarding this submission, please contact Gary M. Wiczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.

Gary M. Wiczorek for

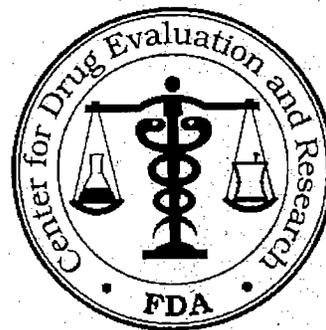
Donna K. Multhauf
Director
Regulatory Affairs

**APPEARS THIS WAY
ON ORIGINAL**

BIOEQUIVALENCY AMENDMENT

ANDA 76-699

OFFICE OF GENERIC DRUGS, CDER, FDA
Document Control Room, Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773 (301-594-0320)



APPLICANT: Schwarz Pharma, Inc.

TEL: 262-238-5171

ATTN: Gary Wieczorek

FAX: 262-238-0957

FROM: Aaron Sigler *AS*

PROJECT MANAGER: 301-827-5847

Dear Sir:

This facsimile is in reference to the bioequivalency data submitted on May 19, 2004, pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Carbidopa and Levodopa Orally Disintegrating Tablets, 10 mg/100 mg, 25 mg/100 mg, and 25 mg/250 mg.

Reference is also made to your amendment dated .

The Division of Bioequivalence has completed its review of the submission(s) referenced above and has identified deficiencies which are presented on the attached page. This facsimile is to be regarded as an official FDA communication and unless requested, a hard-copy will not be mailed.

You should submit a response to these deficiencies in accord with 21 CFR 314.96. Your amendment should respond to all the deficiencies listed. **Facsimiles or partial replies will not be considered for review**, nor will the review clock be reactivated until all deficiencies have been addressed. Your cover letter should clearly indicate that the response is a "Bioequivalency Amendment" and clearly identify any new studies (i.e., fasting, fed, multiple dose, dissolution data, waiver or dissolution waiver) that might be included for each strength. We also request that you include a copy of this communication with your response. Please submit a copy of your amendment in both an archival (blue) and a review (orange) jacket. Please direct any questions concerning this communication to the project manager identified above.

SPECIAL INSTRUCTIONS:

Please acknowledge the dissolution testing and specification.

THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.

If received by someone other than the addressee or a person authorized to deliver this document to the addressee, you are hereby notified that any disclosure, dissemination, copying, or other action to the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us by mail at the above address.

BIOEQUIVALENCE - ACCEPTABLE

ANDA # 76-699

APPLICANT: Schwarz Pharma, Inc.
Mequon, WI

DRUG PRODUCT:

Carbidopa and Levodopa Orally
Disintegrating Tablets
10 mg/100 mg, 25 mg/100 mg, 25 mg/250 mg

The Division of Bioequivalence has completed its review and has no further questions at this time.

The dissolution testing should be conducted in 750 mL of 0.1N HCl at 37°C using USP Apparatus 2 at 50 rpm. The test product should meet the following specifications:

Not less than \bar{Q} (Q) of the labeled amounts of carbidopa and levodopa are dissolved in 10 minutes.

Please note that the bioequivalence comments provided in this communication are preliminary. These comments are subject to revision after review of the entire application, upon consideration of the chemistry, manufacturing and controls, microbiology, labeling, or other scientific or regulatory issues. Please be advised that these reviews may result in the need for additional bioequivalence information and/or studies, or may result in a conclusion that the proposed formulation is not approvable.

Sincerely yours,



Dale P. Conner, Pharm.D.
Director
Division of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

ORIG AMENDMENT

NIAB

August 17, 2004

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

Re: **ANDA 76-699**
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)

Amendment 007: Bioequivalency Amendment
Revised Dissolution Specification

Dear Sir/Madam:

Reference is made to the above-mentioned ANDA; the telephone discussions on August 17, 2004 between Aaron Sigler, OGD Bioequivalence Division Project Manager, and Gary M. Wiczorek, Schwarz Pharma, Inc. (SPInc) Regulatory Affairs Manager; and the bioequivalency amendment letter received by fax from the Office of Generic Drugs on August 17, 2004.

In the August 17, 2004 telephone discussions and fax, the Agency stated that dissolution testing should be conducted in 750 mL of 0.1N HCl at 37°C using USP Apparatus 2 at 50 rpm, and that the test product should meet the following specification:

- Not less than \bar{Q} % (Q) of the labeled amounts of carbidopa and levodopa are dissolved in 10 minutes

In response to this request, SPInc herein submits this amendment. SPInc acknowledges that the finished product will be tested according to the conditions noted above and will meet the Agency's recommended dissolution specification.

A copy of the faxed August 17, 2004 bioequivalence amendment letter is included with this amendment. In addition, a copy of this amendment will be faxed to Aaron Sigler and Yoon Kong, OGD Chemistry Division Project Manager, at the request of Mr. Sigler.

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AUG 19 2004
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This statement will certify that a full and complete copy of this amendment has been forwarded to the Minneapolis District Office of the Food and Drug Administration.

If there are any questions regarding this submission, please contact Gary M. Wiczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.

Gary M. Wiczorek For

Donna K. Multhauf
Director
Regulatory Affairs

**APPEARS THIS WAY
ON ORIGINAL**

August 24, 2004

ORIG AMENDMENT

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Generic Drugs
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

NIA-M

Re: **ANDA 76-699**
PARCOPA™ (Carbidopa-Levodopa Orally Disintegrating Tablets,
10 mg/100mg, 25 mg/100 mg, and 25 mg/250 mg)

A001 to A007: TELEPHONE AMENDMENT – CMC
Product Specification Update and Dissolution Data

Dear Sir/Madam:

Reference is made to the above-mentioned ANDA; Amendment 001 to Amendment 005, submitted July 12, 2004; the Bioequivalency Amendment Letter received by fax on August 17, 2004; Amendment 007, submitted on August 17, 2004; and the teleconference on August 19, 2004 between Yoon Kong, Office of Generic Drugs (OGD) Project Manager, Brenda Arnwine, OGD Chemistry Team Leader, Harald Steltzer, Schwarz Pharma, Inc. (SPInc) Project Manager, and Gary M. Wiczorek, SPInc Regulatory Affairs Manager.

In Amendment 007, SPInc agreed to accept the Bioequivalence Division's recommendation, as noted in the August 17, 2004 Bioequivalency Amendment Letter, to revise the dissolution limits in the drug product specifications. Specifically, SPInc agreed to change the Q limit from 80% to —% and the time limit from 30 minutes to 10 minutes. In the August 19, 2004 teleconference, the Agency requested revised specifications to reflect the agreement to change the dissolution limits, as well as dissolution data from aged lots tested in accordance with the revised dissolution limits.

SPInc herein submits this amendment to include the information requested by the Agency. The revised drug product specifications include the dissolution limit changes described in Amendment 007, as well as the friability limit change described in Amendment 001 to Amendment 005 (the friability limit change from NMT —% to NMT —% applies only to the 10 mg/100 mg and 25 mg/100 mg drug product stability specifications). The last page of each of the product specifications is not included in this submission because it is for internal use only. The information is complete in the pages provided. The dissolution data presented in this amendment are from the three registration batches (lots 920190, 920191, and 920238) stored at 25°C/60% RH for 24 months. Twelve tablets per lot were tested for dissolution at the 10-minute time point. The data support the dissolution limit changes described above and in Amendment 007. Copies of the revised drug product

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AUG 25 2004

OGD / CDER

specifications and the dissolution data have been faxed to Yoon Kong and Karen Bernard, OGD Chemistry Reviewer, as requested by Brenda Arnwine in the August 19, 2004 teleconference.

This statement will certify that a full and complete copy of this amendment has been forwarded to the Minneapolis District Office of the Food and Drug Administration.

If there are any questions regarding this submission, please contact Gary M. Wiczorek, Regulatory Affairs Manager, at 262-238-5171 or by fax at 262-238-0957.

Sincerely,

SCHWARZ PHARMA, Inc.

Gary M. Wiczorek For

Donna K. Multhauf
Director
Regulatory Affairs

APPEARS THIS WAY
ON ORIGINAL

RECEIVED

AUG 25 2004

OGD/CDER