CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

22-348

APPROVAL LETTER

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Silver Spring, MD 20993

NDA 22-348

NDA APPROVAL

Cumberland Pharmaceuticals
2525 West End Avenue
Suite 950
Nashville, TN 37203

Attention: Amy D. Rock, Ph.D.
Senior Manager, Regulatory Affairs

Dear Dr. Rock:

Please refer to your new drug application (NDA) dated December 3, 2008, received December 11, 2008, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Caldolor (Ibuprofen) Injection 400 mg/4 mL and 800 mg/8 mL.

We acknowledge receipt of your submissions dated December 30, 2008, and January 12, 19, and 28, February 4, 20, and 25, March 11 and 20, April 8, 15, 20, 22, 23, and 28, and May 12, 14, 15, 20, and 29, 2009.

This new drug application provides for the use of Caldolor (Ibuprofen) Injection 400 mg/4 mL and 800 mg/8 mL for reduction of fever, and the management of mild to moderate pain and management of moderate to severe pain as an adjunct to opioid analgesics.

We have completed our review of this application, as amended and 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, please submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format as described at http://www.fda.gov/oc/datacouncil/spl.html that is identical to the enclosed labeling text for the package insert. Upon receipt, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission, "**SPL for approved NDA 22-348.**"

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and container labels that are identical to the labels submitted on May 29, 2009, as soon as they are available, but no more than 30 days after they are printed. 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 (October 2005).* 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 "**Final Printed Carton and Container Labels for approved NDA 22-348.**" Approval of this submission by FDA is not required before the labeling is used.

Marketing the products with labeling that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

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 indications in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are deferring submission of your pediatric studies for ages 0 to 16 years until 2011 for the treatment of fever and until 2012 for the management of pain because this product is ready for approval for the use in adults and the pediatric studies have not been completed.

Your deferred pediatric study required under section 505B(a) of the FDCA is a required postmarketing study. The status of this post-marketing study must be reported annually according to 21 CFR 301.70 and section 505B(a)(3)(B) of the FDCA. These required studies are listed below.

1. Deferred pediatric study under PREA for the treatment of reduction in fever in pediatric patients ages 0 to 16 years.

Protocol Submission:	August 2009
Study Start Date:	October 2009
Final Report Submission:	January 2011

2. Deferred pediatric study under PREA for the management of mild to moderate pain and management of moderate to severe pain as an adjunct to opioid analgesics in pediatric patients ages 0 to 16 years.

Protocol Submission:	November 2010
Study Start Date:	January 2011
Final Report Submission:	January 2012

Submit final study reports to this NDA. For administrative purposes, all submissions related to this required pediatric postmarketing study must be clearly designated **"Required Pediatric Assessment."**

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the

proposed materials in draft or mock-up form with annotated references, and 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

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert(s), at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see 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.

LETTERS TO HEALTH CARE PROFESSIONALS

If you issue a letter communicating important safety related information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit an electronic copy of the letter to both this NDA and to the following address:

MedWatch
Food and Drug Administration
Suite 12B05
5600 Fishers Lane
Rockville, MD 20857

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 Kathleen Davies, Regulatory Project Manager, at (301) 796-2205.

Sincerely,

{See appended electronic signature page}

Sharon Hertz, M.D.
Deputy Division Director
Division of Anesthesia, Analgesia
and Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosure: Package Insert
Carton and Immediate 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/

Sharon Hertz
6/11/2009 05:12:22 PM