CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:
22-244/S006

Trade Name: Lusedra

Generic Name: fospropofol disodium

Sponsor: Eisai, Inc.

Approval Date: 1/21/2010
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Reviews / Information Included in this NDA Review.

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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
22-244/S006

APPROVAL LETTER
Dear Dr. Kline:

Please refer to your supplemental new drug application dated November 4, 2009, received November 5, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for LUSEDRA™ (fospropofol disodium) Injection.

This “Changes Being Effected” supplement is submitted to reflect the scheduling of LUSEDRA™ Injection as C-IV under the Controlled Substance Act.

We have completed our review of this application and it is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed upon labeling text, which is identical to the content of labeling [21 CFR 314.50(l)(1)(i)] in structured product labeling (SPL) format submitted on November 4, 2009.

**CONTENT OF LABELING**

We note that your November 4, 2009, submission includes final printed labeling (FPL) for your package insert. We have not reviewed this FPL. You are responsible for assuring that the wording in this printed labeling is identical to that of the approved content of labeling in the structured product labeling (SPL) format.

**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
5600 Fishers Lane, Room 12B05
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 Allison Meyer, Regulatory Project Manager, at (301) 796-1258.

Sincerely,

{See appended electronic signature page}

Bob A. Rappaport, M.D.
Director
Division of Anesthesia, Analgesia, and Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosure
Content of Labeling
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/s/

BOB A RAPPAPORT 01/21/2010
CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
22-244/S006

LABELING
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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
22-244/S006

OTHER REVIEW(S)
Division of Anesthesia, Analgesia, and Rheumatology Products

Regulatory Project Manager Review

Application Number: NDA 22-244/S-006

Name of Drug: LUSEDRA™ (fospropofol disodium) Injection

Sponsor: Eiasi Inc.

Material Reviewed

Submission Date(s): November 4, 2009

Receipt Date(s): November 5, 2009

Background and Summary Description: This supplement contains revisions that reflect the designation of fospropofol as a C-IV controlled substance. Included in this supplement are a revised package insert, primary and secondary packaging labels, and the final label in SPL format.

This review compares the current submission with the final package insert, carton and container labels which were approved on December 12, 2008.

Status Report

Reviews Completed: Allison Meyer, SRHPM, December 16, 2009
Parinda Jani, CPMS
Art Simone, M.D., Ph.D., Medical Officer

RPM Review

Changes noted to SLR-006 are reflected below. Please note that a strikethrough indicates deletion and an underline indicates addition to the approved label.

Please note:
Addition of C-IV symbol and text for controlled substances throughout USPI.

LUSEDRA™ CIV
(fospropofol disodium) Injection

HIGHLIGHTS OF PRESCRIBING INFORMATION
LUSEDRA (fospropofol disodium) Injection, for intravenous use, CIV
Initial U.S. Approval: 2008

----------------------------------DRUG INTERACTIONS----------------------------------
As with other sedative-hypnotic agents, LUSEDRA may produce additive cardiorespiratory effects when administered with other depressants such as benzodiazepines and narcotic analgesics. (7)

FULL PRESCRIBING INFORMATION: CONTENTS*

9 DRUG ABUSE AND DEPENDENCE
  9.1 Abuse
  9.2 Dependence
  9.3 Dependence

FULL PRESCRIBING INFORMATION

1 INDICATIONS AND USAGE:
No changes noted.

2 DOSAGE AND ADMINISTRATION:

2.1 Dosing Guidelines
  - Consider the potential for worsened depression prior to using LUSEDRA concomitantly with other drugs that have the same potential (e.g., sedative-hypnotics or narcotic analgesics) [see Warnings and Precautions (5.2, 5.3)].

3 DOSAGE FORM AND STRENGTH:
No changes noted.

4 CONTRAINDICATIONS:
No changes noted.

5 WARNINGS AND PRECAUTIONS:

5.2 Respiratory Depression
Supplemental oxygen is recommended for all patients receiving LUSEDRA. Dosages of LUSEDRA must be individualized for each patient and titrated to effect [see Dosage and Administration (2.1) and Clinical Pharmacology (12.2)]. Use lower doses of LUSEDRA in patients who are ≥ 65 years of age or who have severe systemic disease [see Dosage and Administration (2.3)]. The additive cardiorespiratory effects of narcotic analgesics and sedative-hypnotic agents should be considered when administered concomitantly with LUSEDRA.

5.3 Hypoxemia
The risk of hypoxemia is reduced by appropriate positioning of the patient, and the use of supplemental oxygen in all patients receiving LUSEDRA. Airway assistance maneuvers may be required in the management of hypoxemia (see Table 4). The additive cardiorespiratory effects of narcotic analgesics and other
sedative-hypnotic agents should be considered when administered concomitantly with LUSEDRA.

6 ADVERSE REACTIONS:
No changes noted.

7 DRUG INTERACTIONS:
LUSEDRA may produce additive cardiorespiratory effects when administered with other cardio-respiratory depressants such as sedative-hypnotics and narcotic analgesics.

8 USE IN SPECIFIC POPULATIONS:
No changes noted.

9 DRUG ABUSE AND DEPENDENCE:

9.1 Abuse Controlled Substance
LUSEDRA is a Schedule IV controlled substance.

9.2 Dependence Abuse
No formal studies of the abuse potential of LUSEDRA have been conducted. Administration of LUSEDRA resulted in euphoria in a small number of subjects who received intravenous or oral dosing.

9.3 Dependence
No formal studies of dependence have been conducted.

10 OVERDOSE:
No changes noted.

11 DESCRIPTION:
No changes noted.

12 CLINICAL PHARMACOLOGY:
No changes noted

13 NONCLINICAL TOXICOLOGY:
No changes noted.

14 CLINICAL STUDIES:
No changes noted.

15 REFERENCES:

16 HOW SUPPLIED/STORAGE AND HANDLING:
NDC 62856-350-01 NDC 62856-350-08

17 PATIENT COUNSELING INFORMATION:

Eisai Inc.
100 Tice Boulevard
Woodcliff Lake, NJ 07677
USA

LUSEDRA is a trademark used by Eisai Inc. under license from Eisai R&D Management Co., Ltd.

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Carton and Container Labeling
C-IV was added to front panel and side panels of carton label.
C-IV was added to container label directly after LUSEDRA™ (fospropofol disodium) Injection C-IV.

RECOMMENDATIONS

An approval action should be taken.

_______________________________________
Regulatory Project Manager/Allison Meyer

_______________________________________
Supervisory Comment/Concurrence/Parinda Jani
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/s/

ALLISON MEYER
01/12/2010

PARINDA JANI
01/12/2010

ARTHUR F SIMONE
01/12/2010
ADMINISTRATIVE and CORRESPONDENCE DOCUMENTS
Dear Dr. Kline:

We have received your supplemental drug application submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for the following:

Name of Drug Product:  LUSEDRA™ (fospropofol disodium) injection

NDA Number:  22244

Supplement number:  S-006

Date of supplement:  November 4, 2009

Date of receipt:  November 5, 2009

This supplemental application, submitted as “Supplement - Changes Being Effected” proposes the following changes: revised labeling that reflects the designation of fospropofol as a scheduled C-IV product under the Controlled Substance Act. Included in this supplement are a revised package insert, primary and secondary packaging labels, and the final label in the SPL format.

Unless we notify you within 60 days of the receipt date that the application is not sufficiently complete to permit a substantive review, we will file the application on January 4, 2010, in accordance with 21 CFR 314.101(a).

Please cite the application number listed above at the top of the first page of all submissions to this application. Send all submissions, electronic or paper, including those sent by overnight mail or courier, to the following address:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Anesthesia, Analgesia and Rheumatology Products
5901-B Ammendale Road
Beltsville, MD 20705-1266

If you have questions, call me at (301) 796-1258.

Sincerely,

{See appended electronic signature page}

Allison Meyer
Senior Regulatory Health Project Manager
Division of Anesthesia, Analgesia and Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research
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/s/

ALLISON MEYER
12/14/2009