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***APPLICATION NUMBER:***  
**202088Orig2s000**

**OTHER ACTION LETTER(s)**



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration  
Silver Spring MD 20993

NDA 202088 / Original-2

**COMPLETE RESPONSE**

Citius Pharmaceuticals, LLC  
Attention: Steven A. Kates, Ph.D.  
Vice President  
63 Great Road  
Maynard, MA 01754

Dear Dr. Kates:

Please refer to your New Drug Application (NDA) dated August 11, 2010, received August 13, 2010, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Suprenza (phentermine hydrochloride) orally dissolving tablets, 37.5 mg.

We acknowledge receipt of your amendments dated September 29, October 11, 12, 13(2), and 28, Nov 15, 17, 18, 23 and 30, and December 9, 17, and 29, 2010, and January 28, February 4, 14, and 18, March 2, 11, 15, 25, and 28, April 7, 8, 13(2), and 21, May 4, 5, and 9, and June 6(3), and June 8, 2011.

Your NDA proposed 15 mg, 30 mg, and 37.5 mg orally dissolving tablets of Suprenza (phentermine hydrochloride) as a short-term (a few weeks) adjunct in a regimen of weight reduction based on exercise, behavioral modification, and caloric restriction in the management of exogenous obesity for patients with an initial body mass index  $\geq 30$  kg/m<sup>2</sup>, or  $\geq 27$  kg/m<sup>2</sup> in the presence of other risk factors (e.g., controlled hypertension, diabetes, hyperlipidemia).

Please note that your NDA was split for administrative purposes as described below:

- NDA 202088/Original-1: 15 mg and 30 mg orally dissolving tablets
- NDA 202088/Original-2: 37.5 mg orally dissolving tablet

The subject of this action letter is NDA 202088/Original-2.

We have completed our review of this application, as amended, and have determined that we cannot approve this application in its present form. We have described our reasons for this action below and, where possible, our recommendations to address these issues.

**SAFETY**

The 37.5 mg strength orally dissolving tablet is

(b) (4)

(b) (4)

## **LABELING**

(b) (4)

Your response must include updated content of labeling [21 CFR 314.50(l)(1)(i)] in structured product labeling (SPL) format as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>.

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 include annotations that support any proposed changes.

## **SAFETY UPDATE**

When you respond to the above deficiencies, include a safety update as described at 21 CFR 314.50(d)(5)(vi)(b). The safety update should include data from all nonclinical and clinical studies/trials of the drug under consideration regardless of indication, dosage form, or dose level.

1. Describe in detail any significant changes or findings in the safety profile.
2. When assembling the sections describing discontinuations due to adverse events, serious adverse events, and common adverse events, incorporate new safety data as follows:
  - Present new safety data from the studies/clinical trials for the proposed indication using the same format as the original NDA submission.
  - Present tabulations of the new safety data combined with the original NDA data.
  - Include tables that compare frequencies of adverse events in the original NDA with the retabulated frequencies described in the bullet above.

- For indications other than the proposed indication, provide separate tables for the frequencies of adverse events occurring in clinical trials.
3. Present a retabulation of the reasons for premature trial discontinuation by incorporating the drop-outs from the newly completed trials. Describe any new trends or patterns identified.
  4. Provide case report forms and narrative summaries for each patient who died during a clinical trial or who did not complete a trial because of an adverse event. In addition, provide narrative summaries for serious adverse events.
  5. Describe any information that suggests a substantial change in the incidence of common, but less serious, adverse events between the new data and the original NDA data.
  6. Provide updated exposure information for the clinical studies/trials (e.g., number of subjects, person time).
  7. Provide a summary of worldwide experience on the safety of this drug. Include an updated estimate of use for drug marketed in other countries.
  8. Provide English translations of current approved foreign labeling not previously submitted.

### **OTHER**

Within one year after the date of this letter, you are required to resubmit or take other actions available under 21 CFR 314.110. If you do not take one of these actions, we may consider your lack of response a request to withdraw the application under 21 CFR 314.65. You may also request an extension of time in which to resubmit the application. A resubmission must fully address all the deficiencies listed. A partial response to this letter will not be processed as a resubmission and will not start a new review cycle.

Under 21 CFR 314.102(d), you may request a meeting or telephone conference with us to discuss what steps you need to take before the application may be approved. If you wish to have such a meeting, submit your meeting request as described in the FDA's "Guidance for Industry - Formal Meetings Between the FDA and Sponsors or Applicants," May 2009 at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM153222.pdf>.

The 37.5 mg dosage strength of this drug product may not be legally marketed until you have been notified in writing that this application is approved.

If you have any questions, call Patricia Madara, Regulatory Project Manager, at 301-796-5332.

Sincerely,

*{See appended electronic signature page}*

Eric Colman, M.D.  
Deputy Director  
Division of Metabolism and Endocrinology  
Products  
Office of Drug Evaluation II  
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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ERIC C COLMAN  
06/13/2011