510(k) Summary

Date Prepared: June 9, 2010

1. Owner's Name: PruGen IP Holdings, Inc.
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   Scottsdale, AZ 85255

   Contact Person: Robert L. Knechtel
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2. Proprietary Name: PR™ Cream
   Common Name: Dressing, Wound & Burn, Hydrogel w/ Drug or Biologic
   Classification Name: Dressing, Wound & Burn, Hydrogel w/ Drug or Biologic

3. Substantially Equivalent Devices: PruGen, Inc. believes that PR™ Cream is substantially equivalent to the following currently marketed device: Tetrix® Cream cleared under K071483.

4. Device Description: PR™ cream is a non-sterile cream formulation intended for topical use only. It is presented for Prescription (requiring a physician diagnosis disease state) use. PR™ cream is for topical dermatologic use only. PR™ cream is applied in a thin layer to affected areas 2-3 times per day or as directed by a physician.

   PR™ cream is a nonsteroidal cream comprised of aluminum magnesium hydroxide stearate, cetyl dimethicone copolyol, cyclomethicone, dimethicone, hexyl laurate, polyglyceryl-4-isostearate, purified water, and sodium chloride. Contains phenoxyethanol and propylparaben as preservatives.

5. Intended Use of the Device: PR™ cream is indicated to manage various types of dermatoses, including atopic dermatitis, allergic contact dermatitis and irritant contact dermatitis. PR™ cream helps to relieve dry, waxy skin by maintaining a moist wound and skin environment, which is beneficial to the healing process.

6. Summary of Technical Characteristics of Device compared to Predicate Devices: The referenced predicate device is also a non-sterile cream that is applied to relieve the symptoms of various dermatoses.

7. Conclusions: Functional and performance testing has been conducted to assess the safety and efficacy of PR Cream™ Cream and results are satisfactory.
Prugen IP Holdings, Inc.
% Robert L. Knechtel, M.D.
EVP and General Counsel
8711 East Pinnacle Peak Road
Suite C201, PMB 225
Scottsdale, Arizona 85255

Re: K093159
   Trade/Device Name: PR™ Cream
   Product Code: FRO
   Dated: April 15, 2010
   Received: April 16, 2010

Dear Dr. Knechtel:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set
forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please go to http://www.fda.gov/AboutFDA/CentersOffices/CDRH/CDRHOffices/ucm115809.htm for the Center for Devices and Radiological Health's (CDRH's) Office of Compliance. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Mark N. Melkerson
Director
Division of Surgical, Orthopedic and Restorative Devices
Office of Device Evaluation
Center for Devices and Radiological Health

Enclosure
INDICATIONS FOR USE

Device Trade Name: PR™ Cream  
510(k) number: K093159

FOR TOPICAL DERMATOLOGICAL USE ONLY

Description Rx Product:

PR™ cream is a non-sterile cream formulation intended for prescription use only.

INDICATIONS AND USAGE:

PR™ cream is indicated to manage various types of dermatoses, including atopic dermatitis, allergic contact dermatitis and irritant contact dermatitis. PR™ cream helps to relieve dry, waxy skin by maintaining a moist wound and skin environment, which is beneficial to the healing process.

Prescription Use X  AND/OR Over-The-Counter Use ___
(Part 21 CFR 801 Subpart D) (21 CFR 801 Subpart C)

(Division Sign-Off)
Division of Surgical, Orthopedic, and Restorative Devices

510(k) Number K093159