CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

40251

CORRESPONDENCE

ANDA 40-251

SEP 23 1997

Mikart Inc.
Attention: Cerie B. McDonald
1750 Chattahoochee Ave., N.W.
Atlanta, GA 30318-2112

Dear Madam:

Reference is made to your abbreviated new drug application submitted pursuant to Section 505 (j) of the Federal Food, Drug and Cosmetic Act for Trihexyphenidyl Hydrochloride Elixir USP, 2 mg/5 mL.

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

Please note that the bioequivalency comments expressed in this letter are preliminary. The above bioequivalency comments may be revised after review of the entire application, upon consideration of the chemistry, manufacturing and controls, microbiology, labeling or other scientific or regulatory issues. A revised determination may require additional information and/or studies, or may conclude that the proposed formulation is not approvable.

Sincerely yours,

for Rabindra N. Patnaik, Ph.D.
Acting Director,
Division of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

ANDA 40-251

Mikart Inc.
Attention: Cerie B. McDonald
1750 Chattahoochee Ave., N.W.
Atlanta, GA 30318-2112

APR 22

Dear Madam:

Please refer to your abbreviated new drug application (ANDA) dated March 10, 1997, submitted under Section 505(j) of the Federal Food, Drug and Cosmetic Act for Trihexyphenidyl Hydrochloride Elixir USP, 2 mg/5 mL.

We have given your application a preliminary review, and we find that it is not sufficiently complete to merit a critical technical review.

We are refusing to file this ANDA under 21 CFR 314.101(d)(3) for the following reasons:

> You have failed to include a qualitative and quantitative formulation comparison between your proposed product and the reference listed drug (RLD). This information is necessary to support your request for a request for waiver of *in vivo* bioequivalence under 21 CFR 320.22(b)(3).
>
> Your executed batch records lack packaging reconciliation records for the test batch. Complete packaging records should contain records for the packaging and labeling operations, including drug product and label reconciliation, as specified in the Office of Generic Drugs, Policy and Procedure Guide #41-95 for Guidance on the Packaging of Test Batches. Please provide this information so that we may determine the exact quantity of drug product that was packaged.

Thus, it will not be filed as an abbreviated new drug application within the meaning of Section 505(j) of the Act.

In addition, while we note that you have provided certificates of analysis for the inactive ingredients, please clarify, in a summary list, the sources of supply and corresponding addresses for the inactive ingredients used in the manufacturer of your proposed drug product.

Also please revise your debarment certification to include the phrase "did not and will not use the services of any debarred person".

Within 30 days of the date of this letter you may amend your application to include the above information or request in writing an informal conference about our refusal to file the application. To file this application over FDA's protest, you must avail yourself of this informal conference.

If after the informal conference, you still do not agree with our conclusion, you may make a written request to file the application over protest, as authorized by 21 CFR 314.101(a)(3)If you do so, the application shall be filed over protest under 21 CFR 314.101(a)(2). The filing date will be 60 days after the date you requested the informal conference. If you have any questions please call:

Anna Marie H. Weikel
Project Manager
(301) 594-0315

Sincerely yours,

/S/

Jerry Phillips
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

4/22/97

ANDA 40-251

Mikart Inc.
Attention: Cerie B. McDonald
1750 Chattahoochee Ave., N.W.
Atlanta, GA 30318-2112

MAY 27 1997

Dear Madam:

We acknowledge the receipt of your abbreviated new drug application submitted pursuant to Section 505(j) of the Federal Food, Drug and Cosmetic Act.

Reference is also made to our "Refuse to File" letter dated April 22, 1997, and your amendment dated May 13, 1997.

NAME OF DRUG: Trihexyphenidyl Hydrochloride Elixir USP, 2 mg/5 mL

DATE OF APPLICATION: March 10, 1997

DATE OF RECEIPT: March 19, 1997

DATE ACCEPTABLE FOR FILING: May 19, 1997

We will correspond with you further after we have had the opportunity to review the application.

Please identify any communications concerning this application with the ANDA number shown above.

Should you have questions concerning this application, contact:

Kassandra Sherrod
Project Manager
(301) 827-5849

Sincerely yours,

/S/

Jerry Phillips 5/27/97
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

Mikart

ORIG AMENDMENT
N/AC

November 9, 1998

Mr. Douglas Sporn, Director
Office of Generic Drugs
Document Control Room
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II (MPN II)
Room 150
7500 Standish Place
Rockville, MD 20855-2773

Re: ANDA 40-251 Trihexyphenidyl Hydrochloride Elixir USP 2 mg per 5 mL
AMENDMENT TO AN UNAPPROVED APPLICATION

Dear Mr. Sporn:

Mikart has received your facsimile letter dated July 7, 1997 regarding the above application. We would like to respond now to the issues raised. We have used the outline of your letter to organize our response. With the submission of this information, there are no longer any outstanding deficiencies and we respectfully request that the application be approved.

At this time, Mikart would also like to amend the application to add an additional designated laboratory facility to conduct Organic Volatile Impurities testing on raw materials. Currently, Mikart and ' are the designated facilities for Organic Volatile Impurities testing. Mikart performs methods I & V, and performs method IV. At this time, Mikart would like to designate ' to also, if necessary, be able to perform any method of Organic Volatile Impurities testing for any raw material requiring such testing.

We are aware that this change requires prior approval by the FDA in order to be implemented, in accordance with 21 CFR 314.70 (b)(2)(iv). Included in this submission, following the deficiency response are:

1. Information from '
2. Revised list of designated test facilities

Following approval of this application, Mikart will add '
as a designated test facility on each applicable raw material specification sheet. The revised specification sheets will be submitted in the annual report.

Mikart, Inc. • Pharmaceutical Manufacturers
1750 Chattahoochee Avenue • Atlanta, Georgia 30318
404-351-4510 • Fax 404-350-0432

Mikart

Thank you for your cooperation in the review of this material. Please feel free to contact us should you require any additional information.

Sincerely,

Cerie B. McDonald
Executive Vice-President

CBM/lac

Enclosure: 1 volume

Mikart, Inc. • Pharmaceutical Manufacturers
1750 Chattahoochee Avenue • Atlanta, Georgia 30318
404-351-4510 • Fax 404-350-0432

MIKART, INC.
PHARMACEUTICAL MANUFACTURERS

505(j)(2)(a)(ok)
Anne marie H. Weikel
5/21/97

May 13, 1997

Mr. Douglas Sporn, Director
Office of Generic Drugs
Document Control Room
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II (MPN II)
Room 150
7500 Standish Place
Rockville, MD 20855-2773

NDA ORIG AMENDMENT
1c

Re: ANDA 40-251 Trihexyphenidyl Hydrochloride Elixir USP 2 mg per 5 mL
AMENDMENT TO AN UNAPPROVED APPLICATION

Dear Mr. Sporn:

Mikart has received your letter dated April 22, 1997 regarding the above application. We would like to respond now to the issues raised. We have used the requests made in your letter to organize our response.

Thank you for your cooperation in the review of this material. Please feel free to contact us should you require any additional information.

Sincerely,

Cerie B. McDonald
Executive Vice-President

CBM/ag

MAY 1 3 1997

1750 CHATTAHOOCHEE AVENUE, N.W., ATLANTA, GEORGIA 30318-2112 PHONE: 404-351-4510 FAX: 404-350-0432

MIKART, INC.
PHARMACEUTICAL MANUFACTURERS

Refuse to File
4/16/97
Ana Marie H. Weikel

March 10, 1997

Mr. Douglas Sporn, Director
Office of Generic Drugs
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II (MPN II)
Room 150
7500 Standish Place
Rockville, MD 20857-2773

Re: Abbreviated New Drug Application for Trihexyphenidyl Hydrochloride Elixir USP 2 mg per 5 mL. Original Submission

Dear Mr. Sporn:

Enclosed please find two copies of an Abbreviated New Drug Application for Trihexyphenidyl Hydrochloride Elixir USP 2 mg per 5 mL for your review and approval. Also included are three additional bound copies of all methodologies pertinent to this product.

Trihexyphenidyl Hydrochloride Elixir USP 2 mg per 5 mL is manufactured by Mikart, Incorporated of Atlanta, Georgia, in accordance with current good manufacturing practices.

Should you have any questions, please do not hesitate to call or write. Thank you for your cooperation in the review of this material.

Sincerely,

Cerie B. McDonald
Executive Vice-President

CBM/ag

Enclosures: duplicate bound ANDA's
triplicate methodologies
3 volumes

[illegible] 1997

GENERIC DRUGS

750 CHATTAHOOCHEE AVENUE, N.W., ATLANTA, GEORGIA 30318-2112 PHONE: 404-351-4510 FAX: 404-350-0432

Mikart

ORIG AMENDMENT
11/Am.

August 31, 1999

Mr. Douglas Sporn, Director
Office of Generic Drugs
Document Control Room
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II (MPN II)
Room 150
7500 Standish Place
Rockville, MD 20855-2773

Re: ANDA 40-251 Trihexyphenidyl Hydrochloride Elixir USP 2 mg per 5 mL
TELEPHONE AMENDMENT TO AN UNAPPROVED APPLICATION

Dear Mr. Sporn:

Mikart received a telephone call from Ms. Kassandra Sherrod on August 3, 1999 regarding the aforementioned application. We would like to respond now to the issues raised. Please see the attached pages for both the agency comment and the Mikart response.

With the submission of this information, there are no longer any outstanding deficiencies and we respectfully request that the application be approved. Thank you for your cooperation in the review of this material. Please feel free to contact us should you require any additional information.

Sincerely,

Cerie B. McDonald
President

CBM/atr

Enclosures

SEP 01
CBE

AUG 3 1 1999

Mikart, Inc. • Pharmaceutical Manufacturers
1750 Chattahoochee Avenue • Atlanta, Georgia 30318
404-351-4510 • Fax 404-350-0432

mAcd 7/16/99
jms

ikart

July 9, 1999

Mr. Douglas Sporn, Director
Office of Generic Drugs
Document Control Room
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II (MPN II)
Room 150
7500 Standish Place
Rockville, MD 20855-2773

NDA ORIG AMENDMENT
N/A

Re: ANDA 40-251 Trihexyphenidyl Hydrochloride Elixir USP 2 mg per 5 mL
MINOR AMENDMENT TO AN UNAPPROVED APPLICATION

Dear Mr. Sporn:

Mikart has received your facsimile letter dated June 24, 1999 regarding the above application. We would like to respond now to the issues raised. We have used the outline of your letter to organize our response. With the submission of this information, there are no longer any outstanding deficiencies and we respectfully request that the application be approved.

Thank you for your cooperation in the review of this material. Please feel free to contact us should you require any additional information.

Sincerely,

for

J. McDonald

CENTER FOR DRUG EVALUATION AND RESEARCH
REC'D
JUL 13 1999
OGD

JUL 09 1999

001

7-15

Mikart, Inc. • Pharmaceutical Manufacturers
1750 Chattahoochee Avenue • Atlanta, Georgia 30318
404-351-4510 • Fax 404-350-0432