

March 23, 2001

West-ward Pharmaceutical Corp.
Attention: Elizabeth A. Vasquez
435/465 Industrial Way West
Eatontown, NJ 07724

Dear Madam:

This is in reference to your abbreviated new drug application dated April 9, 1999, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Butalbital, Acetaminophen, and Caffeine with Codeine Phosphate Capsules, 50 mg/325 mg/40 mg/30 mg.

Reference is also made to your amendments dated December 21, 1999; and October 6, 2000.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Butalbital, Acetaminophen, and Caffeine with Codeine Phosphate Capsules, 50 mg/325 mg/40 mg/30 mg, respectively, to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Fioricet[®] with Codeine Capsules of Novartis Pharmaceuticals Corp). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

Under Section 506A of the Act, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

Post-marketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

We request that you submit, in duplicate, any proposed advertising or promotional copy which you intend to use in your initial advertising or promotional campaigns. Please submit all proposed materials in draft or mock-up form, not final print. Submit both copies together with a copy of the proposed or final printed labeling to the Division of Drug Marketing, Advertising, and Communications (HFD-40). Please do not use Form FD-2253 (Transmittal of Advertisements and Promotional Labeling for Drugs for Human Use) for this initial submission.

We call your attention to 21 CFR 314.81(b)(3) which requires that materials for any subsequent advertising or promotional campaign be submitted to our Division of Drug Marketing, Advertising, and Communications (HFD-40) with a completed Form FD-2253 at the time of their initial use.

Validation of the regulatory methods has not been completed. It is the policy of the Office not to withhold approval until the validation is complete. We acknowledge your commitment to satisfactorily resolve any deficiencies that may be identified.

Sincerely yours,

Gary Buehler
Acting Director
Office of Generic Drugs
Center for Drug Evaluation and Research