DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 20-800

Hollister-Stier Laboratories, LLC
P. O. Box 3145
Spokane, WA 99220-3145

Attention: David L. Mirabell
Director, Regulatory & Professional Affairs

Dear Mr. Mirabell:

Please refer to your new drug application (NDA) dated December 5, 1996, received December 6, 1996, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Twinject Auto-Injector (epinephrine injection 1:1000).

We acknowledge receipt of your submissions dated January 10, and 27, and February 14, and 24, and April 3, 9, 18, and May 29, and September 5, and October 1, and November 10, and December 4, 1997, and 29, May, and June 17, and July 16, and August 24, 1998, and August 16, and December 13, 1999, and April 21, 2000, and March 29, and June 26, and July 17, and August 15, and September 28, and October 29, and December 19, 2001, and February 6, and June 1, and July 26, and August 15, and September 24, and 25, and November 4, and 18, and December 10, 2002, and January 29, and 31, March 31, and May 22, 28, and 29, 2003.

The May 22, 2003, submission constituted a complete response to our January 29, 2003, action letter.

This new drug application is indicated for treatment of severe allergic reactions, including anaphylaxis and anaphylactoid reactions, in response to exposure to bee stings, allergy injections, etc.

We completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

The final printed labeling (FPL) must be identical to the (package insert submitted May 22, 2003, patient information leaflet submitted January 29, 2003, immediate container and carton labels submitted January 29, 2003). Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

Please submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA*. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Individually mount ten of the copies on heavy-weight paper or similar material. For administrative purposes, designate this submission "**FPL for approved NDA 20-800**." Approval of this submission by FDA is not required before the labeling is used.

(b)(4)----------

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FDA's Pediatric Rule [at 21 CFR 314.55/21 CFR 601.27] was challenged in court. On October 17, 2002, the court ruled that FDA did not have the authority to issue the Pediatric Rule and has barred FDA from enforcing it. Although the government decided not to pursue an appeal in the courts, it will work with Congress in an effort to enact legislation requiring pharmaceutical manufacturers to conduct appropriate pediatric clinical trials. In addition, third party interveners have decided to appeal the court's decision striking down the rule. Therefore, we encourage you to submit a pediatric plan that describes development of your product in the pediatric population where it may be used. Please be aware that whether or not this pediatric plan and subsequent submission of pediatric data will be required depends upon passage of legislation or the success of the third party appeal. In any event, we hope you will decide to submit a pediatric plan and conduct the appropriate pediatric studies to provide important information on the safe and effective use of this drug in the relevant pediatric populations.

The pediatric exclusivity provisions of FDAMA as reauthorized by the Best Pharmaceuticals for Children Act are not affected by the court's ruling. Pediatric studies conducted under the terms of section 505A of the Federal Food, Drug, and Cosmetic Act may result in additional marketing exclusivity for certain products. You should refer to the Guidance for Industry on Qualifying for Pediatric Exclusivity (available on our web site at www.fda.gov/cder/pediatric) for details. If you wish to qualify for pediatric exclusivity you should submit a "Proposed Pediatric Study Request". FDA generally does not consider studies submitted to an NDA before issuance of a Written Request as responsive to the Written Request. Applicants should obtain a Written Request before submitting pediatric studies to an NDA.

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this division/Division of Pulmonary & Allergy Drug Products and two copies of both the promotional materials and the package insert directly to:

Division of Drug Marketing, Advertising, and Communications, HFD-42
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

We have not completed validation of the regulatory methods. However, we expect your continued cooperation to resolve any problems that may be identified.

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 Ms. Ladan Jafari, Regulatory Project Manager, at (301) 827-1084.

Sincerely,

{See appended electronic signature page}

Badrul A. Chowdhury, M.D., Ph.D.
Director
Division of Pulmonary and Allergy Drug Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Badrul Chowdhury
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