DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 20-800/S-001

Hollister-Stier Laboratories, LLC
3525 North Regal Street
Spokane, WA 99207-5796

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

Dear Mr. Mirabell:

Please refer to your supplemental new drug application dated July 25, 2003, received July 28, 2003, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Twinject (epinephrine) Auto-Injector.

We acknowledge receipt of your submissions dated November 26, 2003, and April 7, 26, and 27. and May 5, and 24, 2004.

This supplemental new drug application is indicated for the emergency treatment of severe allergic reactions, including anaphylaxis in patients who weigh 15-30 kg (approximately 33-66 Lbs).

We completed our review of this application, as amended. This application is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text and with the revisions listed below.

> The proprietary name (b)(4)---------- has been found to be unacceptable. Provide a different proprietary name and i----------abeling, patient information sheet, and carton and container labels. We recommend that you submit any proprietary name to the Agency for our review prior to its implementation.

The final printed labeling (FPL) must be identical, and include the revisions indicated, to the submitted labeling (package insert and patient information sheet submitted May 24, 2004). These revisions are terms of the approval of this application.

Please submit the FPL electronically 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, in no case more than 30 days after it is printed. Please individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated "FPL for approved supplement NDA 20-800/S-001." Approval of this submission by FDA is not required before the labeling is used.

All applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred. We are deferring submission of your pediatric assessment for patients who weigh less than 15 kg until May 28, 2007.

Your deferred pediatric assessment required under section 2 of the Pediatric Research Equity Act (PREA) is considered a required postmarketing study commitment. The status of this postmarketing commitment shall be reported annually according to 21 CFR 314.81. This commitment is listed below.

1. Deferred pediatric assessments under PREA for the treatment of anaphylaxis in patients who weigh less than 15 kg.

   Final Report Submission: May 28, 2007.

Submit final reports to this NDA. For administrative purposes, all submissions related to this pediatric postmarketing commitment must be clearly designated "**Required Pediatric Study Commitment**".

We remind you of the following agreement:

1. Develop a stability indicating test method which can replace the (b)(4)---------- (b)(4)----within 6 months from the approval of this supplement.

We also have the following comment:

> You have indicated that you are in the process of conducting performance qualification studies of design changes to the auto-injector that should improve patient access to the second dose of epinephrine. Such changes should be submitted as a prior approval supplement. We recommend that you discuss your plans for this supplement with the Division so that we may reach an agreement on the appropriate data package for the supplement.

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

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/ the Division of Pulmonary & Allergy Drug Products and two copies of both the promotional materials and the package inserts directly to:

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

If you issue a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH, HFD-410
FDA
5600 Fishers Lane
Rockville, MD 20857

If you choose to use a proprietary name for this product, the name and its use in the labels must conform to the specifications under 21 CFR 201.10 and 201.15. We recommend that you submit any proprietary name to the Agency for our review prior to its implementation.

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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