Dear Dr. Hoff:

Please refer to your supplemental new drug applications submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for the following:

<table>
<thead>
<tr>
<th>Application</th>
<th>Drug Product</th>
<th>Submitted on:</th>
<th>Received on:</th>
<th>This “Changes Being Effected” Supplement provides for:</th>
</tr>
</thead>
<tbody>
<tr>
<td>NDA 18-081/S-042</td>
<td>Depakene (valproic acid) Capsules</td>
<td>November 10, 2003</td>
<td>November 12, 2003</td>
<td>Changes to the WARNINGS and PRECAUTIONS sections, and the addition of a Patient Information Leaflet</td>
</tr>
<tr>
<td>NDA 18-082/S-026</td>
<td>Depakene (valproic acid) Syrup</td>
<td>November 10, 2003</td>
<td>November 12, 2003</td>
<td>Changes to the WARNINGS and PRECAUTIONS sections, and Patient Information Leaflet sections</td>
</tr>
<tr>
<td>NDA 18-723/S-032</td>
<td>Depakote (divalproex sodium) Delayed Release Tablets</td>
<td>November 10, 2003</td>
<td>November 12, 2003</td>
<td>Changes to the WARNINGS and PRECAUTIONS sections, the addition of a Patient Information Leaflet and Administration Guide</td>
</tr>
<tr>
<td>NDA 19-680/S-019</td>
<td>Depakote (divalproex sodium) Sprinkle Capsules</td>
<td>November 10, 2003</td>
<td>November 12, 2003</td>
<td>Changes to the WARNINGS and PRECAUTIONS sections, the addition of a Patient Information Leaflet</td>
</tr>
<tr>
<td>NDA 20-593/S-011</td>
<td>Depacon (valproate sodium) Injection</td>
<td>November 10, 2003</td>
<td>November 12, 2003</td>
<td>Changes to the WARNINGS and PRECAUTIONS sections</td>
</tr>
<tr>
<td>NDA 21-168/S-009</td>
<td>Depakote ER (divalproex sodium) Extended Release Tablets</td>
<td>November 17, 2003</td>
<td>November 18, 2003</td>
<td>Changes to the WARNINGS and PRECAUTIONS sections, and Patient Information Leaflet</td>
</tr>
</tbody>
</table>
We acknowledge receipt of your submission dated July 21, 2005, which constituted a complete response to our April 29, 2005 action letter, and the major amendment dated December 1, 2005. Your submission also included language under **PRECAUTIONS** for Multi-organ Hypersensitivity Reaction and Hyperammonemia and Encephalopathy Associated with Concomitant Topiramate Use.

We have completed our review of these applications, as amended. These applications are 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 enclosed labeling (text for package insert). We request that the final printed labeling (FPL) submitted to NDA 21-168, Depakote ER tablets, reflect the combined labeling changes under S-009 and S-012.

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 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate these submissions "**FPL for approved supplement NDA 18-081/S-042, NDA 20-593/S-011, NDA 18-082/S-026, NDA 18-723/S-032, NDA 19-680/S-019, NDA 21-168/S-009**.” Approval of these submissions by FDA is not required before the labeling is used.

In addition, submit three copies of the introductory promotional materials that you propose to use for these products. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this Division 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

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).
We also remind you that the patient administration guide for Depakote Sprinkle Capsules, NDA 19-680, should be resubmitted as a CBE for our review.

If you have any questions, call Courtney R. Calder, Pharm.D., Regulatory Project Manager, at (301) 796-1050.

Sincerely,

[See appended electronic signature page]

Russell Katz, MD
Director
Division of Neurology Products
Office of Drug Evaluation I
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/

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Russell Katz
1/11/2006 04:23:20 PM