Dear Dr. Watts:

Please refer to your supplemental new drug application dated and received June 2, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Lexiva (fosamprenavir calcium) 700 mg Tablets and 50 mg/mL Oral Suspension.

We acknowledge receipt of your submissions dated June 17, 2009 and August 18, 2009.

These supplement new drug applications provide for revisions to the package insert:

- to add cholesterol to the Lipid Elevations section and a Nephrolithiasis section to WARNINGS AND PRECAUTIONS;

- to add myocardial infarction, hypercholesterolemia, oral parathesia and nephrolithiasis to the Postmarketing Experience subsection of the ADVERSE REACTIONS section;

In addition, to update the “What are the possible side effects of LEXIVA” section of the patient package insert with information on the signs and symptoms of kidney stones.

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

As soon as possible, but no later than 14 days from the date of this letter, please submit the content of labeling [21 CFR 314.50(l)(1)(i)] in structured product labeling (SPL) format as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm, that is identical to the package insert and patient package insert. Upon receipt, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission, “SPL for approved NDA 21-548/S-021 and NDA 22-116/S-005.

LABELING

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert and text for the patient package insert).

PROMOTIONAL MATERIALS

All promotional materials for your drug product that include representations about your drug product must be promptly revised to make it consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions to your promotional materials should include prominent disclosure of the important new safety information that appears in the revised package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the following address or by facsimile at 301-847-8444:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

In addition, as required under 21 CFR 314.81(b)(3)(i), you must submit your updated final promotional materials, and the package insert(s), at the time of initial dissemination or publication, accompanied by a Form FDA-2253, directly to the above address. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.
LETTERS TO HEALTH CARE PROFESSIONALS

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

    MedWatch
    Food and Drug Administration
    5600 Fishers Lane, Room 12B05
    Rockville, MD 20857

REPORTING REQUIREMENTS

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 Stacey Min, Pharm D., Regulatory Project Manager, at (301) 796-4253.

    Sincerely,

{See appended electronic signature page}

Debra Birnkrant, M.D.
Director
Division of Antiviral Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

Enclosure

Package insert and Patient package insert
<table>
<thead>
<tr>
<th>Application Type/Number</th>
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<th>Submitter Name</th>
<th>Product Name</th>
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<td>LEXIVA ORAL</td>
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This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

KENDALL A MARCUS
09/11/2009