Dear Ms. Glassner:

Please refer to your Supplemental New Drug Application (sNDA) dated October 12, 2010, received October 13, 2010, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for ARDUAN (pipecuronium bromide) for Injection, 1mg/mL.

We also refer to our letter dated September 16, 2010, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we believe should be included in the labeling for ARDUAN (pipecuronium bromide). This information pertains to the risk of anaphylactic and anaphylactoid type adverse reactions, including fatalities reported in association with use of neuromuscular blockers.

This supplemental new drug application provides for revisions to the labeling for ARDUAN (pipecuronium bromide) consistent with our September 16, 2010, letter.

We have completed our review of this supplemental application. 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, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm, that is identical to, except with the revisions indicated, the enclosed labeling (text for the package insert) and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements. Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.
Also within 14 days from the date of this letter, amend all pending supplemental applications for this NDA, including pending CBE supplements, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format that includes the changes with the revisions approved in this supplemental application.

**PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

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

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.(b)(3)(i)]. Form FDA 2253 is available at [http://www.fda.gov/opacom/morechoices/fdaforms/cder.html](http://www.fda.gov/opacom/morechoices/fdaforms/cder.html); instructions are provided on 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](http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm).

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in 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 address above or by fax to 301-847-8444.

**LETTERS TO HEALTH CARE PROFESSIONALS**

If you decide to 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, at least 24 hours prior to issuing the letter, an electronic copy of the letter to this NDA to the following address:

MedWatch Program  
Office of Special Health Issues  
Food and Drug Administration  
10903 New Hampshire Ave  
Building 32, Mail Stop 5353  
Silver Spring, MD 20993

Reference ID: 2867735
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 Katherine Won, Safety Regulatory Project Manager, at (301) 796-7568.

Sincerely,

{See appended electronic signature page}

Larissa Lapteva, M.D., M.H.S.
Deputy Director for Safety
Division of Anesthesia and Analgesia
Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE(S):
Content of Labeling
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

KATHERINE S WON
11/22/2010

LARISSA LAPTEVA
11/22/2010