



NDA 021911/S-005

SUPPLEMENT APPROVAL

Eisai Medical Research, Inc.
Attention: Ira Do, Pharm.D.
Senior Manager, Regulatory Affairs
300 Tice Boulevard
Woodcliff Lake, NJ 07677

Dear Dr. Do:

Please refer to your supplemental new drug application dated June 18, 2009, received June 19, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Banzel (rufinamide) Tablets, 200 and 400 mg.

We acknowledge receipt of your submissions dated March 12, May 24, July 14, and October 18 and 28, 2010

This "Prior Approval" supplemental new drug application provides for transition to Physician's Labeling Rule format, a comprehensive Medication Guide and a Risk Evaluation and Mitigation Strategy (REMS).

We have completed our review of this application, as amended, and 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, 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 the enclosed labeling (text for the package insert and Medication Guide). For administrative purposes, please designate this submission, "**SPL for approved NDA 021911/S-005.**"

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>.

We request that the revised labeling approved today be available on your website within 10 days of receipt of this letter.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS (REMS)

Section 505-1 of the FDCA authorizes FDA to require the submission of a REMS if FDA determines that such a strategy is necessary to ensure that the benefits of the drug outweigh the risks (section 505-1(a)). The details of the REMS requirements for Banzel (rufinamide) Tablets were outlined in our REMS notification letter dated June 17, 2010.

The REMS for Banzel (rufinamide) Tablets was originally approved on November 14, 2008. The REMS consists of a Medication Guide and a timetable for submission of assessments of the REMS. In a letter dated June 17, 2010 we notified you that the approved REMS for Banzel (rufinamide) Tablets must be modified to revise the Medication Guide to include more comprehensive safety information.

Your proposed modified REMS, submitted on October 28, 2010, and appended to this letter, is approved. The REMS consists of a Medication Guide and a timetable for submission of assessments of the REMS.

The timetable for submission of assessments of the REMS will remain the same as that approved on November 14, 2008.

The REMS assessment plan should include but is not limited to the following:

- a. An evaluation of patients' understanding of the serious risks of Banzel (rufinamide) Tablets
- b. A report on periodic assessments of the distribution and dispensing of the Medication Guide in accordance with 21 CFR 208.24
- c. A report on failures to adhere to distribution and dispensing requirements, and corrective actions taken to address noncompliance

The requirements for assessments of an approved REMS under section 505-1(g)(3) include, in section 505-1(g)(3)(B) and (C), requirements for information on the status of any postapproval study or clinical trial required under section 505(o) or otherwise undertaken to investigate a safety issue. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 314.81(b)(2)vii and including any updates to the status information since the annual report was prepared. Failure to comply with the REMS assessments provisions in section 505-1(g) could result in enforcement action.

We remind you that in addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of FDCA.

Prominently identify future submissions containing the REMS assessment or proposed REMS modification with the following appropriate wording in bold capital letters at the top of the first page of the submission:

NDA 021911 REMS ASSESSMENT

**NEW SUPPLEMENT FOR NDA 021911
PROPOSED REMS MODIFICATION
REMS ASSESSMENT**

**NEW SUPPLEMENT FOR (NEW INDICATION FOR USE) FOR NDA 021911
REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)**

If you do not submit electronically, please send 5 copies of REMS-related submissions.

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 Susan Daugherty, Regulatory Project Manager, at (301) 796-0878.

Sincerely,

{See appended electronic signature page}

Russell Katz, M.D.
Director
Division of Neurology Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

Enclosures:
Content of Labeling
REMS

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

/s/

RUSSELL G KATZ
11/08/2010