Dear Ms. Douglas:

Please refer to your Supplemental New Drug Applications (sNDAs) dated November 12, 2010, received November 12, 2010, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Neurontin® (gabapentin) Capsules, Tablets, and Oral Solution.

We acknowledge receipt of your amendments dated January 14, 2011; February 11, 2011; and June 22, 2011. We also acknowledge receipt of your amendment dated May 26, 2011, that included a risk evaluation and mitigation strategy (REMS) assessment.

These “Prior Approval” supplemental new drug applications provide for the addition of Drug Reaction with Eosinophilia and Systemic Symptoms (DRESS) language to the labeling, as well as elimination of the requirement for the approved Neurontin (gabapentin) REMS.

We have completed our review of these supplemental applications, as amended. They are approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

We note that your June 22, 2011, submission includes final printed labeling (FPL) for your package insert and Medication Guide. We have not reviewed this FPL. You are responsible for assuring that the wording in this printed labeling is identical to that of the approved content of labeling in the structured product labeling (SPL) format.

**RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS**

The REMS for Neurontin (gabapentin) was originally approved on October 11, 2010. The REMS consists of a Medication Guide and a timetable for submission of assessments of the REMS.

You propose that FDA no longer require a REMS for Neurontin (gabapentin).
We have determined that maintaining the Medication Guide as part of the approved labeling is adequate to address the serious and significant public health concern and meets the standard in 21 CFR 208.1. Therefore, it is no longer necessary to include the Medication Guide as an element of the approved REMS to ensure that the benefits of Neurontin (gabapentin) outweigh its risks.

Therefore, we agree with your proposal and a REMS for Neurontin (gabapentin) is no longer required.

We remind you that the Medication Guide will continue to be part of the approved labeling in accordance with 21 CFR 208.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at [http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm](http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm). Content of labeling must be identical to the enclosed labeling (text for the package insert and Medication Guide), with the addition of any labeling changes in pending “Changes Being Effected” (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.


The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).
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 314.81(b)(3)(i)]. Form FDA 2253 is available at 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.

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 Su-Lin Sun, PharmD, Regulatory Project Manager, at (301) 796-0036.

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
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
08/10/2011