Dear Ms. Conaway:

Please refer to your Supplemental New Drug Application (sNDA) dated December 8, 2010, received December 9, 2010, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Lupron Depot-Ped (leuprolide acetate for depot suspension), 1-Month 7.5 mg, 11.25 mg and 15 mg and for Lupron Depot-Ped (leuprolide acetate for depot suspension), 3-Month 11.25 mg and 30 mg.

We acknowledge receipt of your amendments dated August 29 and 30, and September 30, 2011. We also acknowledge receipt on October 5, 2011, of your emailed agreement to revisions to the draft package insert emailed to you on October 4, 2011.

This “Prior Approval” supplemental new drug application provides for the addition of efficacy information to the Clinical Studies section of the Lupron Depot-Ped, 1-Month, package insert based upon the Phase 3/4 completed clinical study report for Study M90-516, entitled “Study of Lupron Depot in the Treatment of Central Precocious Puberty”. This sNDA does not provide for any changes to the Lupron Depot-Ped, 3-Month, package insert.

We have completed our review of this supplemental 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, 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), 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.
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 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).

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because none of these criteria apply to your application, you are exempt from this requirement.

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 Jennifer Johnson, Regulatory Project Manager, at (301) 796-2194.

Sincerely,

{See appended electronic signature page}

Mary H. Parks, M.D.
Director
Division of Metabolism and Endocrinology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE: Package Insert for 1-Month (7.5 mg, 11.25 mg and 15 mg) formulation
Package Insert for 3-Month (11.25 mg and 30 mg) formulation (Approved August 15, 2011)
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

MARY H PARKS
10/08/2011