



NDA 021060/S-006

SUPPLEMENT APPROVAL

Azur Pharma International, Limited
c/o Beckloff Associates, Inc
7400 West 110th St, Suite 300
Overland Park, KS 66210

Attention: Gary Hindman, Ph.D.
Director, Managing Consultant
Beckloff Associates, Inc

Dear Dr. Hindman:

Please refer to your Supplemental New Drug Application (sNDA) dated July 30, 2010, received July 30, 2010, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Prialt (ziconotide) intrathecal infusion.

We also acknowledge receipt of your amendment dated July 1, 2011.

This "Prior Approval" supplemental new drug application provides for conversion of the package insert to the Physician's Labeling Rule (PLR) format.

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>. 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).

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 Matt Sullivan, Senior Regulatory Project Manager, at (301) 796-1245.

Sincerely,

{See appended electronic signature page}

Bob A. Rappaport, M.D.
Director
Division of Anesthesia, Analgesia, and
Addiction 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/

SHARON H HERTZ on behalf of BOB A RAPPAPORT
09/01/2011
Signing for Bob Rappaport, M.D.