



NDA 021462/S-029  
NDA 021462/S-030  
NDA 021462/S-032

## SUPPLEMENT APPROVAL

Eli Lilly and Company  
Attention: Daniel R. Brady, Ph.D., RAC  
Senior Director  
Global Affairs - US  
Lilly Corporate Center  
Indianapolis, Indiana 46285

Dear Dr. Brady:

Please refer to your Supplemental New Drug Applications (sNDAs) S-029 and S-032, dated July 16, 2010, received July 16, 2010, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Alimta, (pemetrexed disodium) sterile lyophilized powder, 500 mg vials & 100 mg vials.

We acknowledge receipt of your amendments to S-029 and S-032 dated October 20, 2010; January 10, 2011; April 8, 2011; May 10, 2011; September 20, 2011; September 23, 2011; October 13, 2011; November 03, 2011; November 14, 2011; and November 16, 2011.

The September 20, 2011 (S-032) and September 23, 2011 (S-029) submissions constituted a complete response to our May 16, 2011, action letter, respectively.

We also refer to your sNDA S-030 dated August 10, 2010, received August 10, 2010 submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Alimta, (pemetrexed disodium) sterile lyophilized powder, 500 mg vials & 100 mg vials.

We acknowledge receipt of your amendments to S-030 dated July 20, 2011; August 3, 2011; October 18, 2011; November 14, 2011; and November 16, 2011.

**S-029:** This "Prior Approval" supplemental new drug application (S-029) provides for revisions to Highlights and Section 5.7 Third Space Fluid of the package insert, to include the effects of Alimta in patients with or without third space fluid.

**S-030:** This "Prior Approval" supplemental new drug application (S-030) provides for revisions to the package insert to include removal of the Recent Major Change of "Indications and Usage, Locally Advanced or Metastatic Nonsquamous Non-Small Lung Cancer - Maintenance (1.2) (07/2009)" due to exhaustion of the 1 year requirement; revision of the Table of Contents to be consistent with the Full Prescribing Information; creation of a new subsection under Section 6.0 titled "Additional Clinical Trials Experience" to add information regarding "sepsis;" and

revision of Section 6.2 Post-Marketing Experience and of the patient package insert to include bullous conditions.

**S-032:** This “Prior Approval” supplemental new drug application (S-032) provides for revisions to the Highlights, 5.4 Use of Non-Steroidal Anti-Inflammatory Drugs with Mild to Moderate Renal Insufficiency, 7.1 Non-Steroidal Anti-Inflammatory Drugs (NSAIDs), and 7.2 Nephrotoxic Drugs sections of the package insert to include updated data concerning concomitant use of Alimta with non-steroidal anti-inflammatory drugs (NSAIDs).

We have completed our review of these three 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.

### **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 and patient package insert), with the addition of any labeling changes in pending “Changes Being Effectuated” (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 these supplemental applications, 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  
Office of Prescription Drug Promotion  
Division of Professional Promotion  
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 Professional Promotion (DPP), 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 Deanne Varney, Regulatory Project Manager, at (301) 796-0297.

Sincerely,

*{See appended electronic signature page}*

Patricia Keegan, M.D.  
Director  
Division of Oncology Products 2  
Office of Oncology and Hematology Products  
Center for Drug Evaluation and Research

Amna Ibrahim, M.D.  
Deputy Director  
Division of Oncology Products 1  
Office of Hematology and Oncology Products  
Center for Drug Evaluation and Research

ENCLOSURE:  
Content of Labeling

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**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
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/s/  
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AMNA IBRAHIM  
11/18/2011

PATRICIA KEEGAN  
11/18/2011