



NDA 022038/S-002

SUPPLEMENT APPROVAL

Upsher-Smith Laboratories, Inc.
Attention: Regina Frost
Regulatory Labeling Specialist
6701 Evenstad Drive
Maple Grove, MN 55369

Dear Ms. Frost:

Please refer to your Supplemental New Drug Application (sNDA) dated June 30, 2009, received July 1, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Divigel® (estradiol gel) 0.1%.

We acknowledge receipt of your amendments dated May 3, 2010, September 13, 2010, January 28, 2011, April 22, 2011, and February 28, 2012.

This supplemental new drug application provides for revisions to the labeling to comply with the Physician Labeling Rule (PLR). This supplemental application, as amended, also provides for the addition of a new CONTRAINDICATION of anaphylactic reaction or angioedema, a new CONTRAINDICATION of thrombophilic disorders, a new WARNINGS AND PRECAUTIONS of hereditary angioedema, and revisions to the labeling based on current recommended estrogen-class labeling for hormone therapy products.

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(1)] 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, text for the patient 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 via 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.

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 Samantha Bell, Regulatory Project Manager, at (301) 796-9687.

Sincerely,

{See appended electronic signature page}

Christine Nguyen, M.D.
Acting Deputy Director for Safety
Division of Reproductive and Urologic Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

ENCLOSURE:
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/

CHRISTINE P NGUYEN
05/29/2012