DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville, MD 20857

ANDA 200435

TEVA Pharmaceuticals, USA
Attention: John Derstine
Director, Regulatory Affairs
1090 Horsham Road
P.O.Box 1090
North Wales, PA 19454

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) received on September 14, 2009, and submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Amlodipine, Valsartan and Hydrochlorothiazide Tablets, 5 mg/160 mg/12.5 mg, 10 mg/160 mg/12.5 mg,[1] 5 mg/160 mg/25 mg, 10 mg/160 mg/25 mg, and 10 mg/320 mg/25 mg.

Reference is made to the tentative approval letter issued by this office dated April 22, 2012, and also to your amendments dated April 27, August 22, August 29, and August 31, 2012.

We have completed the review of this ANDA and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the ANDA is approved, effective on the date of this letter. The Division of Bioequivalence has determined your Amlodipine, Valsartan and Hydrochlorothiazide Tablets, 5 mg/160 mg/12.5 mg, 10 mg/160 mg/12.5 mg, 5 mg/160 mg/25 mg, 10 mg/160 mg/25 mg and 10 mg/320 mg/25 mg, to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug (RLD), Exforge HCT Tablets, 5 mg/160 mg/12.5 mg, 10 mg/160 mg/12.5 mg, 5 mg/160 mg/25 mg, 10 mg/160 mg/25 mg, and 10 mg/320 mg/25 mg, respectively, of Novartis Pharmaceuticals Corp. (Novartis). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

[1] The 10 mg/160 mg/12.5 mg strength was submitted in an amendment received on October 22, 2009.

The RLD upon which you have based your ANDA, Novartis' Exforge HCT Tablets, is subject to periods of patent protection. As noted in the agency's publication titled Approved Drug Products with Therapeutic Equivalence Evaluations (the "Orange Book"), U.S. Patent Nos. 6,294,197 (the '197 patent) and 8,101,599 (the '599 patent) are scheduled to expire on December 18, 2017 (pediatric exclusivity added,) and May 16, 2023, respectively.

Your ANDA contains paragraph IV certifications under section 505(j)(2)(A)(vii)(IV) of the Act stating that each patent is invalid, unenforceable, or will not be infringed by your manufacture, use, or sale of Amlodipine, Valsartan and Hydrochlorothiazide Tablets, 5 mg/160 mg/12.5 mg, 10 mg/160 mg/12.5 mg, 5 mg/160 mg/25 mg; 10 mg/160 mg/25 mg and 10 mg/320 mg/25 mg, under this ANDA. You have notified the agency TEVA Pharmaceuticals USA (TEVA) complied with the requirements of section 505(j)(2)(B) of the Act, and that no action for infringement of either patent was brought against TEVA within the statutory 45-day period, which action would have resulted in a 30-month stay of approval under section 505(j)(5)(B)(iii).

With respect to 180-day generic drug exclusivity, we note that TEVA was the first ANDA applicant to submit a substantially complete ANDA with a paragraph IV certification for Amlodipine, Valsartan and Hydrochlorothiazide Tablets, 5 mg/160 mg/12.5 mg, 10 mg/160 mg/12.5 mg, 5 mg/160 mg/25 mg, 10 mg/160 mg/25 mg and 10 mg/320 mg/25 mg. Therefore, with this approval, TEVA is eligible for generic drug exclusivity for Amlodipine, Valsartan and Hydrochlorothiazide Tablets, 5 mg/160 mg/12.5 mg, 10 mg/160 mg/12.5 mg, 5 mg/160 mg/25 mg, 10 mg/160 mg/25 mg and 10 mg/320 mg/25 mg.[2] This exclusivity, which is provided for under section 505(j)(5)(B)(iv) of the Act, will begin to run from the commercial marketing date identified in section 505(j)(5)(B)(iv). Please submit correspondence to this ANDA informing the agency of the date the exclusivity begins to run.

Under section 506A of the Act, certain changes in the conditions described in this ANDA require an approved supplemental application before the change may be made.

[2] As noted above, ANDA 090869 for four of the five strengths was received on September 14, 2009, and an amendment for the fifth strength was received on October 22, 2009. As further noted above, this ANDA was tentatively approved on April 22, 2012. Therefore, with respect to four of the five strengths, this ANDA was not granted tentative approval within the 30-month period described in section 505(j)(5)(D)(i)(IV). Nevertheless, the agency has determined that the failure to obtain tentative approval within the 30-month period was caused by a change in or a review of the requirements for approval of the application imposed after the date on which the application was filed, specifically a review of ANDA approval requirements with respect to tablet size. We therefore conclude that the exclusivity period described in section 505(j)(5)(B)(iv) of the Act was not forfeited by TEVA.

Please note that if FDA requires a Risk Evaluation & Mitigation Strategy (REMS) for a listed drug, an ANDA citing that listed drug also will be required to have a REMS. See section 505-1(i) of the Act.

Postmarketing reporting requirements for this ANDA are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

Promotional materials may be submitted to FDA for comment prior to publication or dissemination. Please note that these submissions are voluntary. If you desire comments on proposed launch promotional materials with respect to compliance with applicable regulatory requirements, we recommend you submit, in draft or mock-up form, two copies of both the promotional materials and package insert directly to:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705

We call your attention to 21 CFR 314.81(b)(3) which requires that all promotional materials be submitted to the Office of Prescription Drug Promotion with a completed Form FDA 2253 at the time of their initial use.

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm, that is identical in content to the approved labeling (including the package insert, and any patient package insert and/or Medication Guide that may be required). 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.

Sincerely yours,

{See appended electronic signature page}

Gregory P. Geba, M.D., M.P.H.
Director
Office of Generic Drugs
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

ROBERT L WEST

09/25/2012

Deputy Director, Office of Generic Drugs, for
Gregory P. Geba, M.D., M.P.H.