Dear Mr. Wooldridge:

Please refer to your Supplemental New Drug Application (sNDA) dated and received September 25, 2012, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Durezol (difluprednate ophthalmic emulsion) 0.05%.

We acknowledge receipt of your amendments dated October 15, and December 6 and 12, 2012, and March 8 and 19, 2013.

This “Prior Approval” supplemental new drug application provides for revisions to the Pediatric Use section of the package insert to reflect the results from Clinical Study C-10-004 entitled, “A Phase 3B, Multicenter, Randomized, Double-Masked, Parallel-Group, Active-Controlled Study of the Safety and Efficacy of Difluprednate Ophthalmic Emulsion, 0.05% (Durezol) 4 Times Daily (QID) and Prednisolone Acetate Ophthalmic Suspension, 1.0% (Pred Forte) QID for the Treatment of Inflammation Following Cataract Surgery in Children 0 to 3 Years of Age.

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 and with the minor editorial revision listed below and included in the enclosed labeling:

For each Recent Major Change listed in the Highlights, please mark the corresponding new or modified text in the Full Prescribing Information with a vertical line (“margin mark”) on the left edge.

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 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 that includes labeling changes 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).

**FULFILLMENT OF POSTMARKETING REQUIREMENT**

We note that this supplemental application contains the final report for the following postmarketing requirement listed in the June 23, 2008, approval letter.

1444-1 A study of pediatric patients 0 to 3 years of age for the treatment of post-operative inflammation following cataract surgery

We have reviewed your submission and conclude that the above requirement was fulfilled.

This completes all of your postmarketing requirements acknowledged in our June 23, 2008, letter.

**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 (OPDP)  
5901-B Ammendale Road  
Beltville, MD 20705-1266

Reference ID: 3281174
You must submit final promotional materials and package insert, 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 Office of Prescription Drug Promotion (OPDP), 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 Michael Puglisi, Regulatory Project Manager, at (301) 796-0791.

Sincerely,

{See appended electronic signature page}

Wiley A. Chambers, M.D.
Deputy Director
Division of Transplant and Ophthalmology Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

ENCLOSURES:
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/

WILEY A CHAMBERS
03/22/2013