Dear Ms. Kliewer:

Please refer to your Supplemental New Drug Application (sNDA) dated November 19, 2013, received November 19, 2013, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Pradaxa (dabigatran etexilate mesylate) 75 and 150 mg Capsules.

We acknowledge receipt of your submission dated December 9, 2013.

This Prior Approval supplemental new drug application provides a recommendation for all patients to take Pradaxa with a full glass of water and to note the occurrence of the adverse event “esophageal ulcers” in the post-marketing experience.

**APPROVAL & LABELING**

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. These changes are as follows:

**FULL PRESCRIBING INFORMATION (FPI) CHANGES**

- To Section 2, DOSAGE AND ADMINISTRATION, subsection 2.3, Instructions to Patients, the following phrase was added:
  
  “PRADAXA should be taken with a full glass of water.”

- In Section 6.2, Postmarketing Experience, the reaction, “esophageal ulcer”, was added.

- The following statement in 17.1, Instructions for Patients, was added:
  
  “Advise patients that the capsule should be taken with a full glass of water.”

- In Section 2.1 (DOSAGE AND ADMINISTRATION - Recommended Dose), Section 12.3 (CLINICAL PHARMACOLOGY - Pharmacokinetics – Absorption), Section 17.1 (Instructions for Patients) and in the Medication Guide, instruction to the patient that PRADAXA could be taken,
“with or without food” was removed from these sections. This information was retained in subsection 12.3 and the Medication Guide.

MEDICATION GUIDE CHANGES

- Under “How should I take PRADAXA” in the Medication Guide, the following statement was added:

  “You should take PRADAXA with water”.

We note that your December 9, 2013, submission includes final printed labeling (FPL) for your package insert and Medication Guide. We have not reviewed this FPL. You are responsible for assuring that the wording in this printed labeling is identical to that of the approved content of labeling in the structured product labeling (SPL) format.

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 Medication Guide), 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).

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, please contact:

Alison Blaus, RAC
Regulatory Project Manager
(301) 796-1138

Sincerely,

{See appended electronic signature page}

Mary Ross Southworth, Pharm.D.
Deputy Director for Safety
Division of Cardiovascular and Renal Products
Office of Drug Evaluation I
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/

ALISON L BLAUS
12/10/2013

MARY R SOUTHWORTH
12/10/2013