Dear Dr. Grundy:

Please refer to your Supplemental New Drug Applications (sNDA) dated July 30, 2014, received July 30, 2014, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for the following:

<table>
<thead>
<tr>
<th>Application</th>
<th>Drug Product</th>
<th>Submitted on</th>
<th>Received on</th>
</tr>
</thead>
<tbody>
<tr>
<td>NDA 020505/S-055</td>
<td>Topamax (topiramate) Tablets (25mg, 50mg, 100mg, and 200mg)</td>
<td>07/30/2014</td>
<td>07/30/2014</td>
</tr>
<tr>
<td>NDA 020844/S-046</td>
<td>Topamax (topiramate) Sprinkle Capsules (15mg, and 25mg)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

These “Prior Approval” supplements provide for:

- Addition of information describing an increased risk for bleeding in Section 6, Adverse Reactions.
- Correction of increase in mean metformin Cmax from 17% to 18% in Section 12, Clinical Pharmacology.


**APPROVAL & LABELING**

We have completed our review of these 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 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.


The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include 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).
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
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/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf. Information and Instructions for completing the form can be found at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf. 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, please contact Su-Lin Sun, PharmD, Regulatory Project Manager, by email su-lin.sun@fda.hhs.gov or by phone at (301) 796-0036.

Sincerely,

{See appended electronic signature page}

Alice Hughes, M.D.
Deputy Director for Safety
Division of Neurology 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/

ALICE HUGHES
12/18/2014