



NDA 021825/S-003

**SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING
REQUIREMENTS**

ApoPharma Inc.
c/o Cato Research Ltd.
Attention: Lynda Sutton
Chief Regulatory Officer
4364 South Alston Avenue
Durham, NC 27713-2220

Dear Ms. Sutton:

Please refer to your Supplemental New Drug Application (sNDA) dated August 28, 2014, received August 28, 2014, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Ferriprox[®] (deferiprone) tablets.

We acknowledge receipt of your amendment dated January 28 and February 13, 2015.

This "Prior Approval" supplemental new drug application proposes updates to the US Prescribing Information (USPI) regarding QT/QTc prolongation and renal and hepatic impairment.

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.

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.

FULFILLMENT OF POSTMARKETING REQUIREMENTS

We have received your submissions dated July 31, 2014 (PMR 1828-4) and April 15, 2014 (PMR 1828-5), containing the final reports for the following postmarketing requirements listed in the October 14, 2011 approval letter.

PMR 1828-4 Conduct a pharmacokinetic trial of both deferiprone and its primary 3-O-glucuronide metabolite in subjects with hepatic impairment. This pharmacokinetic trial should be conducted in a population with mild to severe hepatic insufficiency and the number of patients enrolled in the trial should be sufficient to detect PK differences. The subjects enrolled in this trial should have demographics that are representative of the indicated population (e.g., age, weight, gender, race). Submit the protocol for review and concurrence prior to commencing.

Final Protocol Submission:	September 2012
Trial Completion:	February 2014
Final Report Submission:	July 2014

PMR 1828-5 Conduct a pharmacokinetic trial of both deferiprone and its primary 3-O-glucuronide metabolite in subjects with renal impairment. This pharmacokinetic trial should be conducted in a population with mild to severe renal insufficiency and the number of patients enrolled in the trial should be sufficient to detect PK differences. The subjects enrolled in this trial should have demographics that represent the indicated population (e.g., age, weight, gender, race) to the extent possible. Submit the protocol for review and concurrence prior to commencing.

Final Protocol Submission: September 2012
Trial Completion: February 2014
Final Report Submission: July 2014

We have reviewed your submission and conclude that the above requirements were fulfilled.

We remind you that there are postmarketing requirements listed in the October 14, 2011 approval letter that are still open.

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, call Amy Chi, Regulatory Project Manager, at (240) 402-0992.

Sincerely,

{See appended electronic signature page}

Ann T. Farrell, MD
Director
Division of Hematology Products
Office of Hematology and Oncology Products
Center for Drug Evaluation and Research

ENCLOSURE(S):
Content of Labeling
Medication Guide

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

/s/

ANN T FARRELL
02/24/2015