Dear Dr. Emerson:

Please refer to your Supplemental New Drug Applications (sNDAs) received September 17, 2014 submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA), for KALETRA® (lopinavir/ritonavir) film-coated tablets, 200 mg/50 mg; 100 mg/25 mg (NDA 21906), and KALETRA® (lopinavir/ritonavir) oral solution, 80 mg/20 mg/mL (NDA 21251).

We also refer to your amendments dated:

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<tr>
<td>October 16, 2014</td>
<td>October 20, 2014</td>
<td>October 24, 2014</td>
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<td>February 18, 2015</td>
<td>March 11, 2015</td>
<td>April 9, 2015</td>
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<td>April 17, 2015</td>
<td>May 4, 2015</td>
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These “Prior Approval” supplemental new drug applications propose the following changes:

1. To update DRUG INTERACTIONS, section of the labeling with information on non-nucleoside reverse transcriptase inhibitors (etravirine and rilpivirine), and the hepatitis C virus protease inhibitor, simeprevir.
2. To update Use in Specific Populations, Pediatric Use subsection with information from the clinical trial that investigated the use of a once daily dosing regimen.
3. To update the Medication Guide’s “What should I tell my doctor before taking Kaletra?” section with simeprevir information.

**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.
WAIVER OF HIGHLIGHTS SECTION

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

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, 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 includes labeling changes for these NDAs, 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.

We note that you have fulfilled the pediatric studies requirement for all relevant pediatric age groups for this application.

FULFILLMENT OF POSTMARKETING REQUIREMENT(S)/COMMITMENT(S)
We have received your submission dated September 17, 2014, containing the final report for the following postmarketing requirement listed in the April 27, 2010 approval letter.

1632-1 Please submit the 24 week results of PENTA 18 evaluating the pharmacokinetic, safety and activity of twice daily and once daily dosing of Kaletra tablets in a reviewable format. Submit a final report that includes detailed summaries of pharmacokinetic, safety and activity data as well as electronic datasets.

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

This completes all of your postmarketing requirements acknowledged in our April 27, 2010 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
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 Nina Mani, Regulatory Project Manager, at (240) 402-0333.

Sincerely,

{See appended electronic signature page}

Jeffrey S. Murray, MD, MPH
Deputy Director
Division of Antiviral Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

ENCLOSURE(S):
Content of Labeling (PPI and MedGuide)
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

JEFFREY S MURRAY
06/26/2015