



NDA 204078/S-007

**SUPPLEMENT APPROVAL  
RELEASE FROM POSTMARKETING REQUIREMENT**

Éclat Pharmaceuticals LLC  
c/o The Weinberg Group, Inc.  
1129 Twentieth St. NW, Suite 600  
Washington DC 20036

Attention: Marla Scarola, MS  
Senior Consultant

Dear Ms. Scarola:

Please refer to your Supplemental New Drug Application (sNDA) dated and received February 19, 2015, submitted pursuant to Section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Bloxiverz (neostigmine methylsulfate injection).

We acknowledge receipt of your amendment dated September 17, 2015.

This “Prior Approval” supplemental new drug application proposes revisions to the **USE IN SPECIFIC POPULATIONS** and **NONCLINICAL TOXICOLOGY** sections of the package insert.

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), 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*, available 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).

### **RELEASE OF POSTMARKETING REQUIREMENTS**

Your February 19, 2015 submission also reports on the following postmarketing requirements (PMRs) listed in our May 31, 2013, approval letter, and also contains updated labeling for the PMRs.

- 2046-3 Conduct a fertility and early embryonic development toxicology study in the rat model for neostigmine methylsulfate.
- 2046-4 Conduct an embryo-fetal developmental toxicology study using the rat model for neostigmine methylsulfate.
- 2046-5 Conduct an embryo-fetal developmental toxicology study using the rabbit model for neostigmine methylsulfate.
- 2046-6 Conduct a peri- and post-natal developmental toxicology study in the rat model for neostigmine methylsulfate.

We have reviewed your submission and have determined that you are released from the above requirements. We acknowledge that the results of the nonclinical studies presented in another approved neostigmine product label provide the safety information that FDA was seeking when we required the above-listed PMR studies. Therefore, the required post-approval studies would no longer provide any new understanding of the safety of neostigmine methylsulfate as they have already been completed by another Sponsor.

This completes all of your postmarketing requirements and postmarketing commitments acknowledged in our May 13, 2013, letter.

### **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 Allison Meyer, Regulatory Project Manager, at (301) 796-1258.

Sincerely,

*{See appended electronic signature page}*

Sharon Hertz, MD  
Director  
Division of Anesthesia, Analgesia, and  
Addiction Products  
Office of Drug Evaluation II  
Center for Drug Evaluation and Research

ENCLOSURE(S):  
Content of Labeling

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**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
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/s/  
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SHARON H HERTZ  
10/20/2015