

Food and Drug Administration Silver Spring MD 20993

NDA 202067/S-004 NDA 203993/S-005

#### SUPPLEMENT APPROVAL

Lundbeck, LLC Attention: Thomas Stothoff Director, US Regulatory Affairs Six Parkway North Suite 400 Deerfield, IL 60015

Dear Mr. Stothoff:

Please refer to your Supplemental New Drug Applications (sNDA), dated and received November 22, 2016, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Onfi (clobazam) tablet and Onfi (clobazam) oral suspension.

We also refer to our letter dated August 31, 2016, notifying you, under Section 505(0)(4) of the FDCA, of new safety information that we believe should be included in the labeling for benzodiazepines. This information pertains to the serious risks of profound sedation, respiratory depression, coma, and death associated with the concomitant use of benzodiazepines and opioids.

These supplemental new drug applications provide for revisions to the labeling for Onfi, consistent with our August 31, 2016, letter.

### **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 <a href="http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm">http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm</a>. 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.

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/U CM072392.pdf.

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:

OPDP Regulatory Project Manager Food and Drug Administration Center for Drug Evaluation and Research Office of Prescription Drug Promotion (OPDP) 5901-B Ammendale Road Beltsville, MD 20705-1266

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at:

<u>http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/U</u> <u>CM443702.pdf</u> ). 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

<u>http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf</u>. Information and Instructions for completing the form can be found at <u>http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf</u>. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <u>http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm</u>.

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety information that appears in the revised package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the address above, by fax to 301-847-8444, or electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at:

<u>http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/U</u> <u>CM443702.pdf</u> ).

# **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, contact E. Andrew Papanastasiou, Regulatory Project Manager, via email at <u>emilios.papanastaiou@fda.hhs.gov</u> or by phone at (301) 796-1930.

Sincerely,

{See appended electronic signature page}

Alice Hughes, MD Deputy Director for Safety Division of Neurology Products Office of Drug Evaluation I Center for Drug Evaluation and Research

ENCLOSURE(S): 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.

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/s/

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ALICE HUGHES 12/16/2016