



NDA 22511-S23

Horizon Pharma Inc.  
Attention: Christie Ann Idemoto  
Senior Director, Regulatory Affairs  
150 S. Saunders Road, Suite 400  
Lake Forest, IL 60045

Dear Ms. Idemoto:

Please refer to your Supplemental New Drug Application (sNDA) dated March 15, 2018, received, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for VIMOVO (naproxen and esomeprazole magnesium) delayed-release tablets.

We also refer to our letter dated January 24, 2018, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we believe should be included in the labeling for PPIs. This information pertains to the risk of Fundic Gland Polyps (FGPs) among patients using PPIs for more than one year.

### **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 and with the minor editorial revisions listed below:

- Updated revision dates to the current date.
- Deletion of the following text from Warning and Precautions, Section 5.27 Fundic Gland Polyps: (b) (4)
- Added a vertical line in the left margin next to the text for Warning and Precautions, Section 5.27 Fundic Gland Polyps

### **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.

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 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).

### **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 Mimi Phan, Regulatory Project Manager, at (301) 796-5408.

Sincerely,

*{See appended electronic signature page}*

Joyce Korvick, M.D., M.P.H.  
Deputy Director for Safety  
Division of Gastroenterology and Inborn Errors  
Products  
Office of Drug Evaluation III  
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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JOYCE A KORVICK  
06/07/2018