



NDA 207962

NDA APPROVAL

Scilex Pharmaceuticals, Inc.
c/o Clinipace Worldwide
4840 Pearl East Circle
Suite #201E
Boulder, CO 80301

Attention: Emileigh K. Greuber
Associate Director, Regulatory and Strategic Development

Dear Ms. Greuber:

Please refer to your New Drug Application (NDA) dated and received July 10, 2015, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for ZTLIDO (lidocaine topical system) 1.8%.

We acknowledge receipt of your amendment dated August 28, 2017, which constituted a complete response to our May 10, 2016, action letter.

This new drug application provides for the use of ZTLIDO for relief of pain associated with post-herpetic neuralgia.

We have completed our review of this 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. Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (May 2015, Revision 3)*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labels for approved NDA 207962.**” Approval of this submission by FDA is not required before the labeling is used.

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.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to identify the unexpected serious risks for dermal toxicity, genotoxicity, or dermal carcinogenicity.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess these serious risks.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following studies:

- 3348-1 Conduct a 9-month minipig study using the approved drug product. The study should mimic the clinical use of the drug product with repeated applications to the same location as per the product labeling.

The timetable you submitted on February 14, 2018, states that you will conduct this study according to the following schedule:

Final Protocol Submission: 07/2018
Study Completion: 10/2019
Final Report Submission: 01/2020

- 3348-2 Conduct a 2-year dermal carcinogenicity study to evaluate the carcinogenic potential of terpene resin, dipropylene glycol, SIS block copolymer, isostearic acid, and polyisobutylene.

The timetable you submitted on February 14, 2018, states that you will conduct this study according to the following schedule:

Final Protocol Submission: 04/2020
Study Completion: 06/2023
Final Report Submission: 10/2023

- 3348-3 Conduct a leachables study employing validated analytical methods capable of detecting at least a ^(b)₍₄₎ mcg/day safety concern threshold that demonstrates what level ^(b)₍₄₎ leaches from the patches at the maximum daily dose (3 patches per day).

The timetable you submitted on February 14, 2018, states that you will conduct this study according to the following schedule:

Final Protocol Submission: 07/2018
Study Completion: 10/2018
Final Report Submission: 09/2018

- 3348-4 Conduct an Ames assay ^(b)₍₄₎.

The timetable you submitted on February 14, 2018, states that you will conduct this study according to the following schedule:

Final Protocol Submission: 11/2018
Study Completion: 02/2019
Final Report Submission: 04/2019

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a

safety issue. Section 506B of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii). We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the prescribing information, Medication Guide, and patient PI (as applicable) to:

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
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:

<http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf>).

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the prescribing information, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. 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>.

EXPIRATION INFORMATION

ZTlido is granted an expiry of 24 months when stored at 20°C to 25°C (68°F to 77°F), excursions permitted between 15°C and 30°C (between 59°F and 86°F).

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}

Ellen Fields, MD, MPH
Deputy Director
Division of Anesthesia, Analgesia,
And Addiction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosures:

Content of Labeling
Carton and Container Labeling

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

/s/

ELLEN W FIELDS
02/28/2018