Dear Ms. Arukwe:

Please refer to your supplemental New Drug Applications (sNDAs) submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA), for the following:

<table>
<thead>
<tr>
<th>Application</th>
<th>Product Name</th>
<th>Submitted &amp; Received on:</th>
</tr>
</thead>
<tbody>
<tr>
<td>NDA 21035/S-102</td>
<td>Keppra (levetiracetam) tablets</td>
<td>December 21, 2018</td>
</tr>
<tr>
<td>NDA 21505/S-42</td>
<td>Keppra (levetiracetam) oral solution</td>
<td></td>
</tr>
<tr>
<td>NDA 21872/S-28</td>
<td>Keppra (levetiracetam) injection</td>
<td></td>
</tr>
</tbody>
</table>

**These supplements provide for:**

The use of Keppra (levetiracetam) as monotherapy in treatment of partial-onset seizures (POS) in patients 1 month of age and older; and updated labeling to comply with the Pregnancy and Lactation Labeling Rule (PLLR).

<table>
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<tr>
<th>Application</th>
<th>Product Name</th>
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</tr>
</thead>
<tbody>
<tr>
<td>NDA 22285/S-28</td>
<td>Keppra XR (levetiracetam) tablets</td>
<td>December 21, 2018</td>
</tr>
</tbody>
</table>

**These supplements provide for:**

The use of Keppra XR (levetiracetam) as monotherapy in treatment of POS in patients 12 years of age and older; updated labeling to comply with the PLLR.

**APPROVAL & LABELING**

We have completed our review of these applications, as amended. They are approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.
WAIVER OF ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS

Please note that we have previously granted a waiver of the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of Prescribing Information for Keppra (levetiracetam) tablets and oral solution.

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 FDA.gov.¹ Content of labeling must be identical to the enclosed labeling, 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 SPL Standard for Content of Labeling Technical Qs and As.²

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include 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 Microsoft Word format, that includes the changes approved in these supplemental applications, as well as annual reportable changes. To facilitate review of your submission(s), 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 (which includes new salts and new fixed combinations), 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

¹ http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm
² We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database https://www.fda.gov/RegulatoryInformation/Guidances/default.htm.

U.S. Food and Drug Administration
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the claimed indication 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.

CONTINUED ASSESSMENT OF PREGNANCY OUTCOMES

We request that you report outcomes in infants exposed to Keppra during pregnancy from the North American Antiepileptic Drug Pregnancy Registry and from EURAP (International Registry of Antiepileptic Drugs and Pregnancy) on an annual basis. Although human data have thus far not indicated a risk, continued surveillance is warranted in light of the developmental toxicity observed in animal studies at doses similar to human therapeutic doses.

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 Prescribing Information 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 Providing Regulatory Submissions in Electronic and Non-Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs.3

3 When final, this guidance will represent the FDA's current thinking on this topic. For the most recent version of a guidance, check the FDA guidance web page at https://www.fda.gov/RegulatoryInformation/Guidances/default.htm.

U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov
You must submit final promotional materials and Prescribing Information, 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 FDA.gov.\(^4\) Information and Instructions for completing the form can be found at FDA.gov.\(^5\) For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see FDA.gov.\(^6\)

**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 Heather Bullock, Regulatory Project Manager, via email at heather.bullock@fda.hhs.gov or via telephone at 301-796-1126.

Sincerely,

\{See appended electronic signature page\}

Nick Kozauer, MD
Acting Deputy Director
Division of Neurology Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

**ENCLOSURES:**
- Content of Labeling
  - Prescribing Information
  - Medication Guide

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\(^4\) http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf
\(^5\) http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf
\(^6\) http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm

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Reference ID: 4510419
This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

NICHOLAS A KOZAUER
10/23/2019 07:20:12 PM