NDA 21879/S-014

SUPPLEMENT APPROVAL

Avanir Pharmaceuticals, Inc.
Attention: Mr. Arthur Rosenthal
Executive Director, Global Regulatory Affairs
30 Enterprise, Suite 400
Aliso Viejo, CA 92656

Dear Mr. Rosenthal:

Please refer to your supplemental new drug application (sNDA) dated December 12, 2019, received December 12, 2019, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Nuedexta (dextromethorphan hydrobromide/quinidine sulfate) capsules, 20 mg/10 mg.

This Prior Approval supplemental new drug application provides for an update to the Nuedexta prescribing information to describe the study results from PMR-1704, as requested in our October 30, 2018, "Fulfillment of Postmarketing Requirement/ Supplement Request" letter. These revisions to Section 8 (Use in Specific Populations; Pregnancy) indicate that dextromethorphan/quinidine, orally administered to male and female rats on postnatal day 7 (which corresponds to the third trimester of gestation through the first several months of life but may extend to approximately three years of age in humans), resulted in neuronal death in brain (thalamus and medulla oblongata) at the highest dose tested. In addition, this supplement provides for updates to Section 8 pursuant to the "Pregnancy and Lactation Labeling Rule" (PLLR) and the Guidance for Industry: Pregnancy, Lactation, and Reproductive Potential: Labeling for Human Prescription Drug and Biological Products (2015).

APPROVAL & LABELING

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.

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 text for the Prescribing Information, with the addition of any labeling changes in pending "Changes

[1] http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm

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 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 Microsoft Word format, that includes the changes approved in this supplemental application, 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 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.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

[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.

If you have any questions, contact Michelle Mathers, Regulatory Project Manager, at michelle.mathers@fda.hhs.gov or at (240) 402-2645.

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:

- Content of Labeling
    - Prescribing Information

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/

ALICE HUGHES
06/11/2019 02:29:14 PM