Dear Ms. Giacchi:

Please refer to your supplemental new drug applications (sNDAs) dated and received December 17, 2020, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Topamax (topiramate) tablets and sprinkle capsules.

These Prior Approval sNDAs provide for the addition of serious skin reaction (Stevens-Johnson Syndrome [SJS] and Toxic Epidermal Necrolysis [TEN]) to the Warnings and Precautions and Patient Counseling Information sections of the Topamax Prescribing Information and to the Medication Guide.

APPREOVAL & 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.

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 and 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.

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

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).

**PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs.*

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. Information and Instructions for completing the form can be found at FDA.gov.

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in these supplements, 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 labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4).

---

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](https://www.fda.gov/RegulatoryInformation/Guidances/default.htm).

3 For the most recent version of a guidance, check the FDA guidance web page at [https://www.fda.gov/](https://www.fda.gov/).


U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov
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 Alina Salvatore, Regulatory Project Manager, at 240-402-0379.

Sincerely,

{See appended electronic signature page}

Alice T.D. Hughes, MD
Deputy Director for Safety
Division of Neurology 2
Office of Neuroscience
Center for Drug Evaluation and Research

ENCLOSURE(S):
- Content of Labeling
  - Prescribing Information
  - Medication Guide
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  
06/08/2020 10:11:35 AM