CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 50-756

CORRESPONDENCE

DERMIK LABORATORIES, INC.
Dedicated to Dermatology™
A RHÔNE-POULENC RORER COMPANY

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

July 7, 2000

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
and Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA ORIG AMENDMENT

BM

NDA No. 50-756

BenzaClin™ Topical Gel
(1% clindamycin / 5% benzoyl peroxide)

Amendment to a Pending Application
Response to FDA Request for Information

Dear Mr. Wilkin:

Reference is made to a June 30, 2000 phone conversation Dermik's Kimberley Forbes-McKean had with DDDDP Project Manager Kevin Darryl White during which Mr. White requested the submission of a Safety Update Report to our NDA for BenzaClin™ (1% clindamycin / 5% benzoyl peroxide) Topical Gel, ten (10) Desk Copies of the CMC Amendment submitted June 29, 2000, and an electronic copy of the BenzaClin™ Package Insert.

A Safety Update Report for NDA# 50-756, submitted October 26, 1998, covered the period from April 10, 1998, the date of the original submission, to October 20, 1998. Since the time of the update, three Phase I comparative studies were conducted with the DL-6021 (BenzaClin) formulation; a 14-day *p. acnes* reduction study, and two, 10-day repeat-insult patch test studies. All of the studies were completed, and the information on these three studies was submitted in the annual report for IND# on February 9, 2000.

APPEARS THIS WAY
ON ORIGINAL

ORIGINAL

SECTION (a) Study Information

——— Topical Gel (clindamycin 1% and benzoyl peroxide 5% gel) has — topical formulations that are covered under IND # ———. The DL-6021 formula requires refrigeration after compounding by the pharmacist;

[ ]

During the previous reporting period (December 14, 1997 to December 13, 1998), clinical studies were only performed with the — formulation; however, during the current reporting period no additional clinical studies have been performed with the — formulation.

Three clinical studies were performed with the DL-6021 formulation during the current reporting period, and these studies are listed in the following table with a subsequent short synopsis of each study.

Table of [redacted] Topical Gel Clinical Studies Conducted During the Reporting Period

Study Number	Title	Investigators		Completion Status (Starting Date)	Weeks of Drug Treatment (Frequency)	Test material	M/F (%)	Total Patients enrolled	Results
		Name	Location						
DL-6021-9902	An Open-label, Single-center, Comparative Study of DL-6021 vs. Cleocin® in the Reduction of *p. acnes*.	James Leyden, MD	[redacted]	Completed (April 1999)	2 weeks (BID)	DL-6021 Cleocin T® Gel Cleocin T® Lotion Cleocin T® Solution	49 / 31 61%/39%	80	No deaths or serious adverse events reported. One subject was discontinued due to an ear infection that required the use of a disallowed medication.
DL-6021-9903	An Evaluator-blinded, Open-label Comparison of the Primary Irritation Potential of DL-6021 and Triaz® 6% Gel using a 10-Day Primary Irritation Assay.	Kays Kaidbey, MD	[redacted]	Completed (May 1999)	10 day repeated insult patch test	DL-6021 Triaz® 6% Gel Saline (neg. control) SLS .25% (pos. control)	10 / 17 37%/63%	27	No deaths or serious adverse events reported. No adverse reactions were reported by any of the subjects.
DL-6021-9904	An Evaluator-blinded, Open-label Comparison of the Primary Irritation Potential of DL-6021 and Triaz® 6% Gel using a 10-Day Primary Irritation Assay.	Kays Kaidbey, MD	[redacted]	Completed (May 1999)	10 day repeated insult patch test	DL-6021 Triaz® 6% Gel Saline (neg. control) SLS .25% (pos. control)	19 / 8 70%/30%	27	No deaths or serious adverse events reported. No adverse reactions were reported by any of the subjects.

APPEARS THIS WAY
ON ORIGINAL

Study DL-6021-9902; "An Open-Label, Single-Center, Comparative Study of DL-6021 vs. Cleocin® in the reduction of *P. Acnes*."

Study Number DL-6021-9902 was an open-label, single-center, comparative study involving 80 healthy volunteers ranging from age 18 to 50 years. The objective of the trial was to evaluate the onset of action and effectiveness of four topical products; DL-6021 (1% clindamycin and 5% benzoyl peroxide), Cleocin T® Topical Gel, Cleocin T® Topical Lotion, and Cleocin T® Topical Solution.

Subjects enrolled in the study had baseline *p. acnes* counts greater than 10,000 colonies/cm^2 on the forehead, and were assigned to a twice daily regimen of test product for a two-week treatment regimen. Quantitative bacteriologic cultures were obtained from the test site (forehead) at baseline (Day -2 to Day 0), Day 7 (±1 day), and end of treatment (Day 14±1 day) according to a standardized procedure for obtaining *p. acnes* samples.

Only one adverse event was reported during the study. Subject #78 developed an ear infection for which an antibiotic was prescribed; therefore, the subject was discontinued prematurely since the use of antibiotics were not permitted during the study.

In this two week comparative study, DL-6021 produced a >3 log reduction in the number of p. acnes organisms over the face, and was significantly more effective than the other three test products.

Study DL-6021-9903; "An Evaluator-blinded, Open-label Comparison of the Primary Irritation Potential of DL-6021 and Triaz® 6% Gel Using a 10-day Primary Irritation Assay."

Study Number DL-6021-9903 was an evaluator-blinded, open-label, single-center, study involving twenty-seven (27) healthy volunteers ranging from age 18 to 51 years. The objective of the study was to compare the irritancy potential between DL-6021 and Triaz 6% gel. A repeated insult patch test design was employed, where each subject had approximately 0.1 mL of test material applied to the skin on their upper back. Each site was then covered with non-woven cotton cloth and semi-occlusive tape to ensure intimate contact with the skin. This procedure was repeated for a total of 10 consecutive days. Irritation reactions were graded by a treatment-blinded evaluator.

No adverse reactions were reported by any of the subjects during the trial. All twenty-seven subjects competed the trial as per protocol.

No statistically significant difference was observed for the cumulative irritation scores of either test material (DL-6021 vs. Triaz 6%). The majority of the subjects (23 of 27) had irritation reactions graded as either "0" (=no erythema or normal skin) or "1" (=minimally visible erythema).

Study DL-6021-9904; "An Evaluator-blinded, Open-label Comparison of the Primary Irritation Potential of DL-6021 and Triaz® 6% Gel Using a 10-day Primary Irritation Assay."

Study Number DL-6021-9904 utilized the same design as the DL-6021-9903 study (an evaluator-blinded, open-label, single-center, study). Twenty-seven (27) healthy volunteers ranging from age 18 to 54 years participated in the trial. The objective of the study was to compare the irritancy potential between DL-6021 and Triaz 6% gel. A repeated insult patch test design was employed as described above. This procedure was repeated for a total of 10 consecutive days. Irritation reactions were graded by a treatment-blinded evaluator.

No adverse reactions were reported by any of the subjects during the trial. All patients competed the trial except for two who were lost to follow up.

No statistically significant difference was observed for the cumulative irritation scores of either test material (DL-6021 vs. Triaz 6%). The majority of the subjects had irritation reactions graded as either "0" (=no erythema or normal skin) or "1" (=minimally visible erythema).

DERMIK LABORATORIES, INC.
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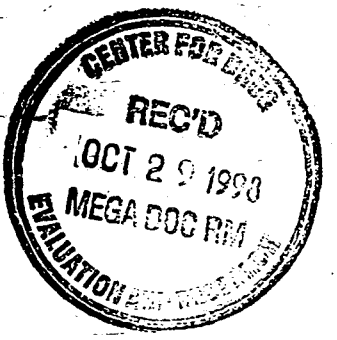
ORIGINAL

October 26, 1998



NDA ORIG AMENDMENT

SU

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation I
Attention: Document Control Room
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

NDA 50-756
——— Topical Gel
(——— 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Safety Update Report

Dear Dr. Wilkin:

Included in this submission is a Safety Update Report for ——— Topical Gel. This report updates the Integrated Summary of Safety information included in the original New Drug Application for ——— Topical Gel submitted on April 10, 1998.

Sincerely yours,

/S/

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

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APPEARS THIS WAY
ON ORIGINAL

DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION

REQUEST FOR CONSULTATION

TO (Division/Office): PETER COONEY, PH.D		FROM: KEVIN DARPIN WHITE	
DATE: 6/16/98	IND NO.	NDA NO. 50-756	TYPE OF DOCUMENT: ORIGINAL
DATE OF DOCUMENT: 4/9/98	NAME OF DRUG: Topicort Gel	PRIORITY CONSIDERATION	CLASSIFICATION OF DRUG: ANTI-ANGS
DESIRED COMPLETION DATE: [redacted]	NAME OF FIRM: DERMIK LABORATORIES		

REASON FOR REQUEST

I. GENERAL

- ☐ NEW PROTOCOL
- ☐ PROGRESS REPORT
- ☐ NEW CORRESPONDENCE
- ☐ DRUG ADVERTISING
- ☐ ADVERSE REACTION REPORT
- ☐ MANUFACTURING CHANGE/ADDITION
- ☐ MEETING PLANNED BY _____
- ☐ PRE-NDA MEETING
- ☐ END OF PHASE II MEETING
- ☐ RESUBMISSION
- ☐ SAFETY/EFFICACY
- ☐ PAPER NDA
- ☐ CONTROL SUPPLEMENT
- ☐ RESPONSE TO DEFICIENCY LETTER
- ☐ FINAL PRINTED LABELING
- ☐ LABELING REVISION
- ☐ ORIGINAL NEW CORRESPONDENCE
- ☐ FORMULATIVE REVIEW
- ☒ OTHER *(Specify below)*

II. BIOMETRICS

STATISTICAL EVALUATION BRANCH	STATISTICAL APPLICATION BRANCH
☐ TYPE A OR B NDA REVIEW	☐ CHEMISTRY
☐ END OF PHASE II MEETING	☐ PHARMACOLOGY
☐ CONTROLLED STUDIES	☐ BIOPHARMACEUTICS
☐ PROTOCOL REVIEW	☐ OTHER
☐ OTHER	

III. BIOPHARMACEUTICS

- ☐ DISSOLUTION
- ☐ BIOAVAILABILITY STUDIES
- ☐ PHASE IV STUDIES
- ☐ DEFICIENCY LETTER RESPONSE
- ☐ PROTOCOL– BIOPHARMACEUTICS
- ☐ IN–VIVO WAIVER REQUEST

IV. DRUG EXPERIENCE

- ☐ PHASE IV SURVEILLANCE/EPIDEMIOLOGY PROTOCOL
- ☐ DRUG USE e.g. POPULATION EXPOSURE, ASSOCIATED DIAGNOSES
- ☐ CASE REPORTS OF SPECIFIC REACTIONS *(List below)*
- ☐ COMPARATIVE RISK ASSESSEMENT ON GENERIC DRUG GROUP
- ☐ REVIEW OF MARKETING EXPERIENCE, DRUG USE AND SAFETY
- ☐ SUMMARY OF ADVERSE EXPERIENCE
- ☐ POISON RISK ANALYSIS

V. SCIENTIFIC INVESTIGATIONS

☐ CLINICAL ☐ PRECLINICAL

COMMENTS/SPECIAL INSTRUCTIONS *(Attach additional sheets if necessary)*

PLEASE REVIEW WITH RESPECT TO CMC MICROBIOLOGY CONCERNS.

TY: N. Sweeney

/S/
6/18/98

CENTER FOR DRUG
REC'D
JUN 17 1998
HFD-160
EVALUATION AND RESEARCH

SIGNATURE OF RECEIVER: /S/	METHOD OF DELIVERY *(Check one)* ☐ MAIL ☐ HAND
	SIGNATURE OF DELIVERER: /S/

FORM FDA 3291 (7/83)

DERMIK LABORATORIES, INC.
A RHÔNE-POULENC RORER COMPANY
Dedicated to Dermatology℠

500 ARCOLA ROAD
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COLLEGEVILLE, PA 19426-0107
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April 09, 1998

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and
Dental Drug Products
Attention: Document Control Room
Food and Drug Administration
Park Building, Room 214
12420 Parklawn Drive
Rockville, MD 20852

New Drug Application No. 50-756
_____ Topical Gel
(clindamycin 1% and
benzoyl peroxide 5% gel)

ORIGINAL NEW DRUG
APPLICATION

Dear Dr. Wilkin:

In accordance with 21 CFR 314.50 of the Federal Food, Drug and Cosmetic Act, Dermik Laboratories, Inc. is submitting an original New Drug Application for _____ Topical Gel (clindamycin 1% and benzoyl peroxide 5% gel) which demonstrates the efficacy and safety of the product in the topical treatment of patients with acne vulgaris.

This application contains the following sections: 1) Index, 2) Draft Labeling, 3) Application Summary, 4A) Chemistry, Manufacturing and Controls, 4B) Sample Information, 4C) Methods Validation Package, 5) Nonclinical Pharmacology and Toxicology, 6) Human Pharmacokinetics and Bioavailability, 7) Microbiology, 8) Clinical data, 10) Statistical, 11) Case Report Tabulations, 12) Case Report Forms, 13) Patent Information, 14) Patent Certification, 16) Debarment Certification, 17) Field Copy Certification, and 18) User Fee Cover Sheet.

Case report form tabulations for the individual medical reports are included in the appendices of each report which are located in the Clinical Data and Statistical sections of this application.

In accordance with the Prescription Drug User Fee Act of 1992, a check No. ——— in the amount of $256,846.00 was sent to the Food and Drug Administration, Pittsburgh, Pennsylvania on March 31, 1998. This application was assigned the User Fee Identification Number 3442.

As required by Section 306(k)(1) of the Generic Drug Enforcement Act {21 U.S.C. 335a (k)(1)}, we hereby certify that, in connection with this application, Dermik Laboratories, Inc. did not and will not use in any capacity the services of any person debarred under subsections 3-6(a) or (b) of the act.

Dermik Laboratories, Inc. considers the information in this application to be confidential and proprietary and we request that no portions thereof be disclosed to third parties, under FOI or otherwise, without first obtaining written consent from Dermik Laboratories, Inc.

If you have any questions or require any additional information during review of this application, please contact me at (610) 454-3026.

Sincerely,

Ronald F. Panner

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/JPT/arz
Enclosures

NEW CORRESP

NC

DERMIK LABORATORIES, INC.

Dedicated to Dermatology™

A RHÔNE-POULENC RORER COMPANY

500 ARCOLA ROAD
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April 24, 1998

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA No. 50-756
———Topical Gel
(clindamycin 1% and
benzoyl peroxide 5% gel)

RESPONSE TO FDA REQUEST
FOR INFORMATION

Dear Dr. Wilkin:

Reference is made to an April 22, 1998 telephone call from Project Manager Mr. Kevin Darryl White to Dermik's Mr. James Thompson during which Mr. White requested additional copies of the Application Summary that was included in the original NDA for ———Topical Gel submitted on April 9, 1998.

In response to Mr. White's request, 14 duplicate copies of Volume 1 of the Original ———Topical Gel NDA have been sent to him at the Corporate Boulevard address. The Application Summary is included in Volume 1.

If you have any questions concerning this submission, please contact me at (610) 454-3026.

Sincerely yours,

APPEARS THIS WAY
ON ORIGINAL

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

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DERMIK LABORATORIES, INC.
Dedicated to Dermatology™
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ORIGINAL

April 30, 1998

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for drug Evaluation and Research
Office of Drug Evaluation V
Attention: Document Control Room
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

APPEARS THIS WAY
ON ORIGINAL

NDA 50-756
———Topical Gel
(clindamycin 1% and
benzoyl peroxide 5% gel)

RESPONSE TO FDA REQUEST
FOR INFORMATION

Dear Dr. Wilkin:

Reference is made to my April 28, 1998 telephone conversation with Project Manager, Mr. Kevin Darryl White, concerning our original NDA for ——— Topical Gel. During this telephone conversation Mr. White requested the submission of an additional copy of Item 7 Microbiology (Volume 17 of the application).

Included in this submission is the requested information.

If you have any questions, or require any additonal information, please contact me at (610) 454-3026.

Sincerely yours,

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

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DERMIK LABORATORIES, INC.
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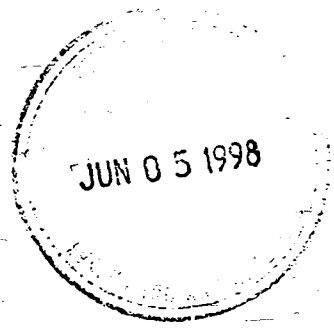
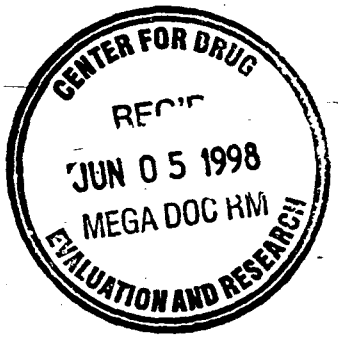
BC

ORIGINAL

June 4, 1998



Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and
Dental Drug Products
Attention: Document Control Room
Rood and Drug Administration
Park Building, Room 214
12420 Parklawn Drive
Rockville, MD 20852



APPEARS THIS WAY
ON ORIGINAL

New Drug Application No. 50-756
Topical Gel
(clindamycin 1% and
benzoyl peroxide 5% gel)

RESPONSE TO FDA REQUEST
FOR INFORMATION
Chemistry, Manufacturing and Controls

Dear Dr. Wilkin:

Reference is made to the telephone conversation Project Manager Kevin Darryl White had with Dermik's Gary Feiss on June 4, 1998. Mr. White requested that a copy of the faxed document that had been sent to him by Mr. Feiss earlier in the day be submitted to the ——— NDA.

Included in this submission is a copy of the requested information.

If you have any questions, please contact me at 610-454-3026.

Sincerely,

James P. Thompson/for

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

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RFP/JPT/slr
Enclosures

DERMIK LABORATORIES, INC.
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BZ

ORIG AMENDMENT

ORIGINAL

NOTE. JUNE 19, 1998

June 18, 1998

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA #50-756
——— Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Response to FDA Request for Information
- Clinical and Statistical Information

Dear Dr. Wilkin,

Reference is made to the June 9, 1998 teleconference between representatives of the Food and Drug Administration and Dermik Laboratories, Inc. during which FDA Project Manager Kevin Darryl White requested the submission of electronic copies of the SAS data sets for the Phase III studies included in the original NDA for ——— Topical Gel.

Included in this submission are electronic copies of the SAS data sets, along with supporting documentation and files as requested. A paper copy of this information is also included.

Also included in this submission are electronic copies of the pivotal study reports included in the original application.

No computer viruses were detected in any of the disks being submitted using the ——— Professional Anti-Virus Program.(version 2.27A).

An introduction to this submission follows the Form FDA 356h.

If you have any questions regarding this submission, please contact me at (610) 454-3026.

Sincerely,

James P. Thompson /for

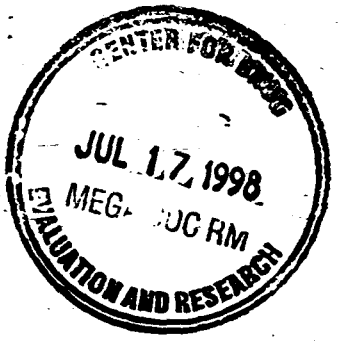
Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

DERMIK LABORATORIES, INC. — A RHÔNE-POULENC RORER COMPANY
Dedicated to Dermatology™

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

July 13, 1998



Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Attention: Document Control Room
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

NDA 50-756
——— Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

RESPONSE TO FDA REQUEST FOR INFORMATION

Dear Dr. Wilkin:

Reference is made to the telephone call we received from Mr. Kevin Darryl White earlier this month during which Mr. White requested the submission of a replacement computer disk containing SAS data sets for the DL-6021-9103 ——— Topical Gel study. We were told that the disk that had previously been submitted was damaged and not functioning properly.

Enclosed with this letter is a computer disk containing the requested information. As the reviewing biostatistician had requested, this disk contains SAS data sets and Format Tables.

Also included in this submission as an attachment is a "Data Dictionary" which is a paper copy of the information included on the disk.

If you have any questions concerning this submission, please contact me at (610) 454-3027.

Sincerely,

James P. Thompson
Manager
Worldwide Regulatory Affairs

Desk Copy: Mr. Kevin Darryl White, Project Manager

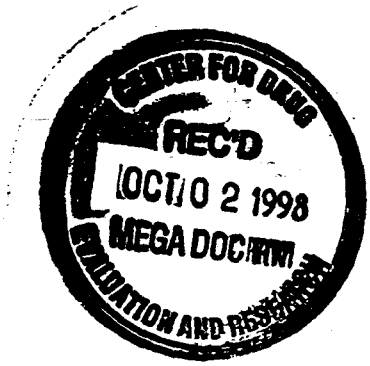
ORIGINAL

DERMIK LABORATORIES, INC.
Dedicated to Dermatology™
A RHÔNE-POULENC RORER COMPANY

NDA ORIG AMENDMENT
BC

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

October 1, 1998



Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
_____™ Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Updated Stability Report

Dear Dr. Wilkin:

Reference is made to a September 23, 1998 telephone conversation FDA Project Manager, Kevin Darryl White, M.B.A., had with Dermik's Gary Feiss concerning the _____ Topical Gel NDA. During this conversation, Mr. White told Mr. Feiss that additional stability data for _____ Topical Gel should be submitted as soon as it is available.

As requested, included in this submission is a six-month stability report for _____ Topical Gel that updates the three-month stability report that was included in the original application.

If you have any questions concerning this report, or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

James P. Thompson /for

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

ORIGINAL

DERMIK LABORATORIES, INC.
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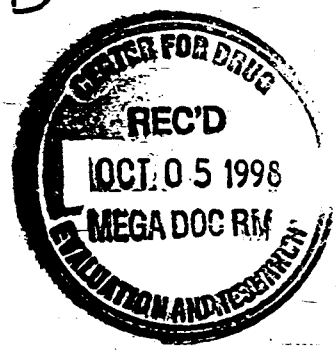
NDA ORIG AMENDMENT
BC

October 2, 1998



Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
———Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
CMC Information

Dear Dr. Wilkin:

Reference is made to a FDA/Dermik teleconference that took place September 23, 1998 and to a subsequent September 24, 1998 telephone conversation Project Manager Kevin Darryl White, M.B.A. had with Dermik's Gary Feiss. During these telephone contacts it was agreed that Dermik would provide the Division of Dermatologic and Dental Drug Products with the ——— response to Form FDA 483 observations resulting from a July 20-24, 1998 inspection by the FDA District Office of their ——— manufacturing facilities. This agreement was contingent upon ——— agreement to make their responses available to Dermik for submission. It was also agreed that those pages in the ——— response specific to ——— would be most appropriate to submit, with any extraneous information about other ——— products expunged.

We have obtained ——— permission to provide DDDDP with their Form FDA 483 responses to their local FDA District Office in Los Angeles. Therefore, we are including in this submission the agreed upon information.

Also included in this submission is a background and overview summary and a descripotion of the attachments.

BEST POSSIBLE COPY

If you have any questions concerning this submission, or if you require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

Ronald F. Panner

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

Desk Copy: Kevin Darryl White, M.B.A., Project Manager

DERMIK LABORATORIES, INC.
Dedicated to Dermatology™
• A RHÔNE-POULENC RORER COMPANY

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
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ORIGINAL

October 23, 1998

Jonathan K. Wilkin, M.D., Director
Division of Dermatological and
Dental Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Attention: Document Control Room
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

NDA ORIG AMENDMENT

BC

NDA 50-756
——— Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Response to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to your August 25, 1998 letter to Dermik Laboratories, Inc. requesting clinical and chemistry, manufacturing and controls information relating to our New Drug Application for ——— (clindamycin 1% and benzoyl peroxide 5% gel) Topical Gel.

The clinical information requested in your letter was sent to Project Manager Mr. Kevin Darryl White via e-mail on September 4, 1998. This information is being formally included in the ——— Topical Gel NDA in this submission.

Also included in this submission is Dermik's response concerning the CMC information requested in your letter.

If you have any questions or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

James P. Thompson/for

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf

Desk Copy: Mr. Kevin Darryl White, Project Manager

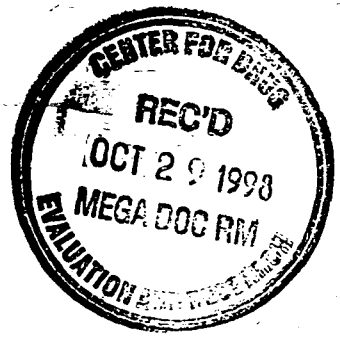
BEST POSSIBLE COPY

DERMIK LABORATORIES, INC.
Dedicated to Dermatology™
A RHÔNE-POULENC RORER COMPANY

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

ORIGINAL

October 26, 1998



NDA ORIG AMENDMENT
SU

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation I
Attention: Document Control Room
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

NDA 50-756
——— Topical Gel
(——— 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Safety Update Report

Dear Dr. Wilkin:

Included in this submission is a Safety Update Report for ——— Topical Gel. This report updates the Integrated Summary of Safety information included in the original New Drug Application for ——— Topical Gel submitted on April 10, 1998.

Sincerely yours,

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

APPEARS THIS WAY
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COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

ORIGINAL

B2

October 27, 1998

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Attention: Document Control Room
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

NDA 50-756
——— Topical Gel
(——————— 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Reply to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to an October 15, 1998 clinical/statistical Information Request from Project Manager Kevin Darryl White, M.B.A. concerning our pending NDA for ——— (clindamycin 1% and benzoyl peroxide 5% gel) Topical Gel.

Included in this submission is the requested information.

If you have any questions or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

Ronald F. Panner

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

BM

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DERMIK LABORATORIES, INC.
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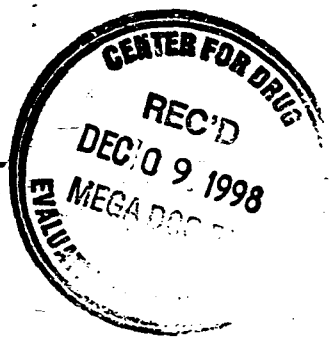
500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

December 2, 1998



Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Attention: Document Control Room
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

NDA 50-756
——— Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application

Response to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to an October 30, 1998 telelphone call from FDA Project Manager Kevin Darryl White, M.B.A to Dermik Project Manager Gary Feiss during which the submission of the physician's global improvement frequency distribution for the DL-6021-9623 study was requested.

Included in this submission is the requested information.

If you have any questions concerning this submission, please contact me at (610) 454-3026.

Sincerely yours,

James P. Thompson / for

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

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~~NDA SUPPL~~ AMEND

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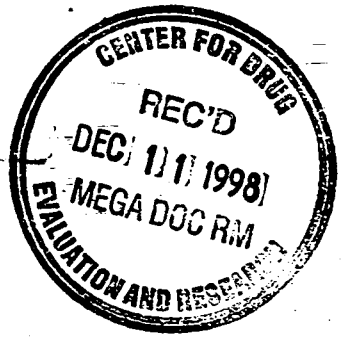
A RHÔNE-POULENC RORER COMPANY

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

December 9, 1998



Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
[redacted] Topical Gel
[redacted] 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Response to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to a September 25, 1998 chemistry, manufacturing and controls request for information letter from Division of New Drug Chemistry III Team Leader Wilson H. DeCamp, Ph.D. concerning our pending NDA for [redacted] 1% and benzoyl peroxide 5% gel)Topical Gel.

Included in this submission are Dermik's responses to Dr. DeCamp's requests.

If you have any questions or require any additional informaiton, please contact me at (610) 454-3026.

Sincerely yours,

Ronald F. Panner

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

Desk Copies: Wilson H. DeCamp, Ph.D., Chemistry Team Leader
Kevin Darryl White, M.B.A., Project Manager

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NDA ORIG AMENDMENT SYBC

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COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

January 8, 1999

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
———— Topical Gel
(clindamycin 1% and benzoly peroxide 5% gel)

Amendment to a Pending Application
Updated Stability Report

Dear Dr. Wilkin:

Reference is made to our October 1, 1998 submission of a six-month stability report for ———— Topical Gel (clindamycin 1% and benzoyl peroxide 5% gel) that updated the three-month stability report that was included in the original application.

Included in this submission is a report of 12-month stability data.

If you have any questions concerning this report, or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

Kathryn A. Roberts for
Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

ORIGINAL

DERMIK LABORATORIES, INC.
Dedicated to Dermatology™
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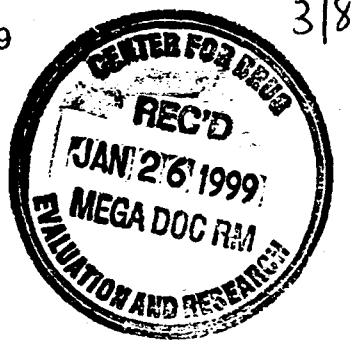
ORIG AMENDMENT

AL

/S/
3/8/99

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

January 20, 1999



Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
BenzaClin™ Topical Gel
(clindamycin 1% and benzoly peroxide 5% gel)

Amendment to a Pending Application
Revised Draft Labeling

Dear Dr. Wilkin:

Included in this submission is revised draft labeling for BenzaClin™ Topical Gel (clindamycin 1% and benzoyl peroxide 5% gel). This labeling updates the draft labeling included in the original New Drug Application that was submitted by Dermik on April 10, 1998.

Please note that the product name ——— has been changed to BenzaClin™.

If you have any questions concerning this proposed labeling, or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/maf
Enclosures

Desk Copy: Kevin Darryl White, M.B.A, Project Manager

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COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

February 4, 1999

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Attention: Document Control Room
Food and Drug Administration
5600 Fishers lane
Rockville, MD 20857

NDA 50-756
BenzaClin™ Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Reply to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to a February 2, 1999 clinical Information Request concerning our pending NDA for BenzaClin™ (clindamycin 1% and benzoyl peroxide 5% gel) Topical Gel that was sent to Dermik's Gary Feiss electronically by Project Manager Kevin Darry White, M.B.A.

Included in this submission is the requested information.

If you have any questions or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

Desk Copy: Mr. Kevin Darryl White, M.B.A., Project Manager

Received 2/11/99 mjr

DERMIK LABORATORIES, INC.
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Dedicated to Dermatology™

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COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

February 4, 1999

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

ORIG AMENDMENT
BM

NDA 50-756
BenzaClin™ Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Reply to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to a February 2, 1999 telephone call from FDA Project Manager Kevin Darryl White, M.B.A. who requested for the clinical reviewer an electronic copy of the draft BenzaClin™ Topical Gel package insert in Word Perfect format.

Please be informed that an electronic copy of the draft BenzaClin™ package insert was sent today to Mr. White electronically in Word Perfect 6.1. A paper copy of the package insert that was electronically sent to Mr. White is included in this submission.

If you have any questions or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

Ronald F. Panner

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

Desk Copy: Mr. Kevin Darryl White, M.B.A., Project Manager

ORIGINAL

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ORIG AMENDMENT
BM

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P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

February 25, 1999

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
BenzaClin™ Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Applicaiton
Reply to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to a February 23, 1999 telephone call from FDA Project Manager Kevin Darryl White, M.B.A. who requested from Dermik the submission of a table that combines all adverse events reported in the DL-6021-9103, DL-6021-9301, DL-6021-9623, and DL-6021 — BenzaClin™ Topical Gel studies. Included in this submission is the requested table.

Please be informed that an electronic copy of the requested table was e-mailed to Mr. White today. A paper copy of the table that was sent to Mr. White electronically is included in this submission.

If you have any questions or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

James P. Thompson /for
Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

Desk Copy: Mr. Kevin Darryl White, M.B.A., Project Manager

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DERMIK LABORATORIES, INC.
A RHÔNE-POULENC RORER COMPANY
Dedicated to Dermatology™

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

March 3, 1999

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products (HFD-540)
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
BenzaClin™ Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
Reply to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to a March 2, 1999 telephone call from FDA Project Manager Kevin Darryl White, M.B.A. who requested additional clinical information related to adverse experiences that occurred during the clinical evaluations of BenzaClin™ Topical Gel. Specifically, Mr. White requested information concerning patients who had experienced exfoliative dermatitis during clinical trials.

Reference is also made to a March 3, 1999 telephone call Mr. White made to Project Management Director Kimberly Forbes-McKean, Ph.D. requesting copies of the nine case report forms for the patients who experienced exfoliative dermatitis in the clindamycin-benzoyl peroxide treatment group.

An electronic copy of information (line listings) concerning patients identified as having experienced exfoliative dermatitis was sent to Mr. White today. The same line listing is attached to this letter. Also attached to this letter, and to a desk copy of this letter that is being sent to Mr. White, are copies of the case report forms of the nine patients who were described as having experienced exfoliative dermatitis in the clindamycin-benzoyl peroxide treatment group.

If you have any questions or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

James P. Thompson /for

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

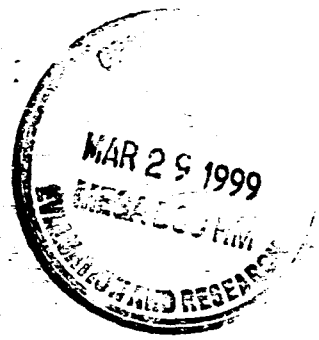
Desk Copy: Mr. Kevin Darryl White, M.B.A., Project Manager

APPEARS THIS WAY
ON ORIGINAL

DERMIK LABORATORIES, INC.
A RHÔNE-POULENC RORER COMPANY
Dedicated to Dermatology™

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

March 26, 1999



Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
BenzaClin™ Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Amendment to a Pending Application
- Chemistry, Manufacturing, and Controls

Dear Dr. Wilkin:

Reference is made to a March 25, 1999 telephone conversation FDA Project Manager Kevin Darryl White, M.B.A. had with Dermik's Worldwide Director of Dermatological Product Development, Kim Forbes-McKean, Ph.D. during which Dr. Forbes-McKean indicated that Dermik would be submitting a description of the process equipment for the manufacture of ——— at the ——— as well as a process validation description for ———

Therefore, as discussed, please find enclosed the following documents:

1. ——— USP Manufacturing Equipment at the ———
   - including completion date for the Installation and Operational Qualification (IO/Q)
2. ——— USP - Process Validation Description

APPEARS THIS WAY
ON ORIGINAL

If you have any questions concerning this submission or require any additional information, please contact me at (610) 454-3026.

Sincerely yours,

Audrey L. Hackman for

Ronald F. Panner
Senior Director
Worldwide Regulatory Affairs

RFP/jpt/mat
Enclosures

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

APPLICATION TO MARKET A NEW DRUG, BIOLOGIC, OR AN ANTIBIOTIC DRUG FOR HUMAN USE

(Title 21, Code of Federal Regulations, 314 & 601)

Form Approved: OMB No. 0910-0338
Expiration Date: April 30, 2000
See OMB Statement on page 2.

FOR FDA USE ONLY

APPLICATION NUMBER

MAR 29 1999

APPLICATION INFORMATION

NAME OF APPLICANT	DATE OF SUBMISSION
Dermik Laboratories, Inc.	March 26, 1999
TELEPHONE NO. *(Include Area Code)*	FACSIMILE (FAX) Number *(Include Area Code)*
(610) 454-3026	(610) 454-5287
APPLICANT ADDRESS *(Number, Street, City, State, Country, ZIP Code or Mail Code, and U.S. License number if previously issued):*	AUTHORIZED U.S. AGENT NAME & ADDRESS *(Number, Street, City, State, ZIP Code, telephone & FAX number)* IF APPLICABLE
500 Arcola Road Collegeville, PA 19426	

PRODUCT DESCRIPTION

NEW DRUG OR ANTIBIOTIC APPLICATION NUMBER, OR BIOLOGICS LICENSE APPLICATION NUMBER (If previously issued) NDA 50-756

ESTABLISHED NAME *(e.g., Proper name, USP/USAN name)*	PROPRIETARY NAME *(trade name)* IF ANY
(clindamycin and benzoyl peroxide gel)	BenzaClin™ Topical Gel
CHEMICAL/BIOCHEMICAL/BLOOD PRODUCT NAME *(If any)*	CODE NAME *(If any)*
See original NDA	DL-6021

DOSAGE FORM:	STRENGTHS:	ROUTE OF ADMINISTRATION:
Topical gel	clindamycin 1% and benzoyl peroxide gel 5%	Topical

(PROPOSED) INDICATION(S) FOR USE: Topical treatment of acne vulgaris

APPLICATION INFORMATION

APPLICATION TYPE (check one) X NEW DRUG APPLICATION (21 CFR 314.50) ☐ ABBREVIATED APPLICATION (ANDA, AADA, 21 CFR 314.94) ☐ BIOLOGICS LICENSE APPLICATION (21 CFR part 601)

IF AN NDA, IDENTIFY THE APPROPRIATE TYPE X 505 (b) (1) ☐ 505 (b) (2) ☐ 507

IF AN ANDA, OR AADA, IDENTIFY THE REFERENCE LISTED DRUG PRODUCT THAT IS THE BASIS FOR THE SUBMISSION
Name of Drug — Holder of Approved Application

TYPE OF SUBMISSION (check one) ORIGINAL APPLICATION X AMENDMENT TO A PENDING APPLICATION ☐ RESUBMISSION ☐ PRESUBMISSION ☐ ANNUAL REPORT ☐ ESTABLISHMENT DESCRIPTION SUPPLEMENT ☐ SUPAC SUPPLEMENT ☐ EFFICACY SUPPLEMENT ☐ LABELING SUPPLEMENT CHEMISTRY MANUFACTURING AND CONTROLS SUPPLEMENT OTHER

REASON FOR SUBMISSION

PROPOSED MARKETING STATUS (check one) X PRESCRIPTION PRODUCT (Rx) ☐ OVER THE COUNTER PRODUCT (OTC)

NUMBER OF VOLUMES SUBMITTED _____ THIS APPLICATION IS X PAPER ☐ PAPER AND ELECTRONIC ☐ ELECTRONIC

ESTABLISHMENT INFORMATION

Provide locations of all manufacturing, packaging and control sites for drug substance and drug product (continuation sheets may be used if necessary). Include name, address, contact, telephone number, registration number (CFN), DMF number, and manufacturing steps and/or type of testing (e.g. Final dosage form, Stability testing) conducted at the site. Please indicate whether the site is ready for inspection or, if not, when it will be ready.

See Original NDA

Cross References (list related License Application, INDs, NDAs, PMAs, 510(k)s, IDEs, BMFs, and DMFs referenced in the current application)

WITHHOLD 5 PAGE (S)

DERMIK LABORATORIES, INC.
Dedicated to Dermatology™
A RHÔNE-POULENC RORER COMPANY

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

NDA ORIG AMENDMENT

June 29, 2000

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

BC

BenzaClin Topical Gel
NDA # 50-756

INFORMATION AMENDMENT:
Chemistry, Manufacturing and Controls

Dear Dr. Wilkin,

Reference is made to our April 9, 1998 New Drug Application and subsequent amendments dated December 9, 1998, February 2, 1999, and March 26, 1999 containing, in part, CMC information for BenzaClin Topical Gel (clindamycin 1% and benzoyl peroxide 5% gel).

Included in this submission is the Dermik response to the "Not Approvable" letter of April 1, 1999. Although not the subject of the "Not Approvable" letter, Dermik is also providing additional information: 24 month real time stability data on — drug product to support a proposed expiry date of — months; documentation relating to the manufacture of — by the — and revised proposed finished product labeling. The CMC section providing documentation for the drug substances has been updated and the revised copy is provided in this submission. There have been no revisions made to the drug product documentation.

In accordance with 21 CFR 314.71(b) this submission contains both an archival copy and a review copy. The submission contains an application form FDA 356h. As required by 21 CFR 314.71(b) a field copy of this submission has been provided to the Philadelphia District Office, the home office of the NDA holder.

ORIGINAL

BEST POSSIBLE COPY

Dermik Laboratories, Inc. considers the information in this application to be confidential and proprietary and we request that no portions thereof be disclosed to third parties, under FOI or otherwise, without first obtaining permission from Dermik Laboratories, Inc.

If you have any questions or comments regarding this submission, please contact me at (610) 454-8094 or James Thompson at (610) 454-3027. We look forward to working with your office over the next six months to provide a successful review and approval of our application.

Sincerely,

Edward J. Smith

Edward J. Smith
Manager CMC
Regulatory Affairs

Enclosures

cc: Debra L. Pagano
Philadelphia District Pre-Approval Manager
U.S. Food and Drug Administration
Room 900, U.S. Customhouse
2nd and Chestnut Streets
Philadelphia, PA 19106-2973

DERMIK LABORATORIES, INC.
Dedicated to Dermatology™
A RHÔNE-POULENC RORER COMPANY

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

July 7, 2000

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental
and Drug Products
Center for Drug Evaluation and Research
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA ORIG AMENDMENT

BM

NDA No. 50- 756

BenzaClin™ Topical Gel
(1% clindamycin / 5% benzoyl peroxide)

Amendment to a Pending Application
Response to FDA Request for Information

Dear Mr. Wilkin:

Reference is made to a June 30, 2000 phone conversation Dermik's Kimberley Forbes-McKean had with DDDDP Project Manager Kevin Darryl White during which Mr. White requested the submission of a Safety Update Report to our NDA for BenzaClin™ (1% clindamycin / 5% benzoyl peroxide) Topical Gel, ten (10) Desk Copies of the CMC Amendment submitted June 29, 2000, and an electronic copy of the BenzaClin™ Package Insert.

A Safety Update Report for NDA# 50-756, submitted October 26, 1998, covered the period from April 10, 1998, the date of the original submission, to October 20, 1998. Since the time of the update, three Phase I comparative studies were conducted with the DL-6021 (BenzaClin) formulation; a 14-day *p. acnes* reduction study, and two, 10-day repeat-insult patch test studies. All of the studies were completed, and the information on these three studies was submitted in the annual report for IND [redacted] on February 9, 2000.

ORIGINAL

In response to Mr. White's request, this submission contains a copy of Section (a) Study Information from the IND Annual Report that includes a tabular summary of the three studies, and a brief synopsis of each of the studies. The data generated do not reasonably affect the statement of contraindications, warnings, precautions, and adverse reactions included in the proposed draft labeling, version PI-7. Therefore, no further revisions to the labeling, last revised January 15, 1999, are indicated. An electronic copy of the Package Insert, version PI-7, is also included. No computer viruses were detected when the disk was scanned using [redacted] Software, [redacted] version 8.04.

Also, included in this submission are ten (10) copies of the requested CMC Amendment.

We believe this submission fully responds to Mr. White's request for information. If you have any questions or require any additional information, please contact me at (610) 454-3027.

Sincerely,

James P. Thompson

James P. Thompson
Manager
Worldwide Regulatory Affairs

JPT/wls

Enclosures

Ten(10) Desk Copies: Mr. Kevin Darryl White, M.B.A.,
Project Manager (June 29, 2000 BenzaClin CMC Amendment)

DERMIK LABORATORIES, INC.
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A RHÔNE-POULENC RORER COMPANY

500 ARCOLA ROAD
P.O. BOX 1200
COLLEGEVILLE, PA 19426-0107
TEL. 610-454-8000

August 4, 2000

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental Drug Products (HFD-540)
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA 50-756
BenzaClin™
(clindamycin and benzoyl peroxide)

CHANGE OF ADDRESS

Dear Dr. Wilkin:

Reference is made to our New Drug Application for BenzaClin™ (clindamycin and benzoyl peroxide).

Please be advised that, effective August 16, 2000, Dermik Laboratories, Inc., the sponsor of the referenced NDA, will move from their Collegeville, Pennsylvania facility to a new facility in Berwyn, Pennsylvania. Our new address is:

Dermik Laboratories, Inc.
1050 Westlakes Drive
Berwyn, PA 19312

Also, please be aware that during a five-day period beginning Friday, August 11, 2000 and ending Tuesday, August 15, 2000, Dermik's office telephones and fax machine will be out of service. However, Ms. Alina Zielinski, a Dermik representative, will be available for telephone calls at (610) 454-3033 and fax messages can be sent to (610) 454-5287.

I will continue to be the primary FDA contact person for Dermik. In addition, Alicia Cabrelli is also authorized as a Dermik contact person. Her telephone number is (484) 595-2775. My new telephone number is (484) 595-2795 and our new fax number is (484) 595-2785.

If you have any questions regarding our relocation or the referenced application, please feel free to contact me at the above listed telephone number.

Sincerely,

James P. Thompson

James P. Thompson
Manager, Regulatory Affairs

noted - letter done
/S/ , 8/15/00

ORIGINAL

DERMIK LABORATORIES, INC.

1050 WESTLAKES DRIVE
BERWYN, PA 19312
484-595-2700

NDA ORIG AMENDMENT

September 20, 2000

Jonathan K. Wilkin, M.D., Director
Division of Dermatologic and Dental Drug Products
Center for Drug Evaluation
Office of Drug Evaluation V
Food and Drug Administration
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

BC

RE: NDA 50-756
BenzaClin™ Topical Gel
(1% clindamycin/5% benzoyl peroxide gel)

Amendment to a Pending Application
Response to FDA Request for Information

Dear Dr. Wilkin:

Reference is made to a September 19, 2000 telephone conversation between Dermik's Mr. Edward Smith and DDDDP review chemist, Dr. James Vidra. During this conversation, Dr. Vidra informed Mr. Smith he could not find any information in [redacted] Drug Master File [redacted] covering [redacted] the BenzaClin™ (clindamycin 1%/benzoyl peroxide 5% gel) Topical Gel [redacted]

Included in this submission is a copy of a letter from [redacted] to FDA authorizing your review of their Type III DMF [redacted] for [redacted] on behalf of Dermik Labs. This DMF has information on [redacted] in the BenzaClin™ [redacted] by [redacted]

If you have any questions or require any additional information, please contact me at 484-595-2795.

Sincerely,

James P. Thompson

James P. Thompson
Manager
Worldwide Regulatory Affairs

ORIGINAL

Enclosure

ORIGINAL

DERMIK LABORATORIES, INC.

1050 WESTLAKES DRIVE
BERWYN, PA 19312
484-595-2700

October 17, 2000

Jonathan Wilkin, MD, Director
Food and Drug Administration
Center for Drug Evaluation and Research
Division of Dermatologic and Dental Drug Products (HFD-540)
9201 Corporate Boulevard
Building No. 2, Second Floor, Room N115
Rockville, MD 20850

NDA #50-756

BenzaClin™ Topical Gel
(clindamycin 1% and benzoyl peroxide 5% gel)

Proposed Draft Labeling

Dear Dr. Wilkin:

Reference is made to our April 9, 1998 New Drug Application and subsequent amendments dated December 9, 1998, February 2, 1999 and March 26, 1999, containing, in part, CMC information for BenzaClin Topical Gel (1% clindamycin and 5% benzoyl peroxide gel). Additional reference is made to a telephone conversation Mr. Kevin Darryl White, Sr. Regulatory Project Manager, DDDDP, had with Dermik's Ms. Alicia Cabrelli on October 12, 2000.

During this conversation, Ms. Cabrelli informed Mr. White that Dermik would be proposing revised draft labeling intended for the Division's review at the October 16, 2000 Labeling Meeting.

Attached for your review are the following documents:

1. *BenzaClin Topical Gel™ Label for the jar (mock-up and clean copies)*
2. *BenzaClin Topical Gel™ Carton (mock-up and clean copies)*
3. ——— *Vial Label (mock-up and clean copies)*
4. *A memo detailing each revision made in the labeling submission included in the June 29, 2000 amendment.*

Thank you for your attention. Please contact me at (484) 595-2795 if you have any questions.

Sincerely,

James P. Thompson

James P. Thompson
Regulatory Manager
Worldwide Regulatory Affairs
Encl.

APPEARS THIS WAY
ON ORIGINAL

BEST POSSIBLE COPY

MEMORANDUM OF TELECONFERENCE

Date: May 13, 1998

Participants:
Dermik Pharmaceuticals, Inc.
Ronald F. Panner, Senior Director, Worldwide Regulatory Affairs

Members from the Food and Drug Administration:
Michael Weintraub, M.D., Office Director, ODEV
Jonathan Wilkin, M.D., Division Director, DDDDP, HFD-540
Mary Jane Walling, Associate Director, ODEV
Areta Kupchyk, Esq., General Attorney, OOCC, GCF-1
Kevin Darryl White, M.B.A., Project Manager, DDDDP, HFD-540

Subject: NDA 50-756 (clindamycin 1% and benzoyl peroxide 5% gel) Topical Gel

Mr. Panner was informed of the Agency's intent to "refuse to file" (RTF) the above-mentioned NDA application because all of the clinical studies supporting this application utilized manufactured by

All AIP materials have been deemed "unreliable" and can not be used to support drug product claims either directly or indirectly.

The Agency advised Mr. Panner that Dermik still has time to withdraw the NDA before any regulatory action (RTF) is exercised. Mr. Panner indicated that he would consider all of their options and contact the Agency within a few days.

NOTE: This application was received April 10, 1998, the filing date is June 9.

cc:
NDA 50-756
HFD-540
HFD-105/Weintraub (via Teamlinks)
GCF-1/Kupchyk (via Teamlinks)
HFD-540/DIV DIR/Wilkin
HFD-540/MO/Huene
HFD-540/CHEM/Vidra
HFD-540/PHARM/Mainigi
HFD-880/BIOPHARM/Noory
HFD-540/BIOSTAT/Farr
HFD-540/PROJ MGR/White

/S/ 5/14/98

TELECONFERENCE MEMO

2.1

MEMORANDUM OF TELECONFERENCE

Date: June 9, 1998

Members from Dermik Laboratories, Inc.
Ronald F. Panner, Senior Director, Worldwide Regulatory Affairs
James P. Thompson, Manager, Regulatory Affairs
Kenneth Feld, Ph.D., Director, Research & Development, Dermik
Kim A. Forbes-McKean, Director, Regulatory Affairs & Project Mgmt
Gary Feiss, M.S., Senior Manager, Regulatory Affairs

Members from the Food and Drug Adminstration:
Jonathan Wilkin, M.D., Divison Director, DDDDP, HFD-540
Michael Weintraub, M.D., Office Director, ODEV, HFD-105
Robert DeLap, M.D., Ph.D., Deputy Office Director, ODEV, HFD-105
Mary Jane Walling, Associate Director, ODEV, HFD-105
Kevin Darryl White, M.B.A., Project Manager, DDDDP, HFD-540

/S/

Subject: NDA 50-756 ——— Topical Gel

This teleconference was convened to notify Dermik that the aforementioned NDA application will be filed today (June 9). Although the application was judged fileable, the review will be complicated by the fact that the NDA referenced an application that is subject to the "Application Integrity Policy" (AIP). A favorable action on the application will require sufficient information without relying on the AADA that is subject to the AIP.

Deficiencies in this application will be determined during the review process. Additional information needed to support the application will be identified for the Applicant during this review cycle, and the Agency is committed to forwarding information request letters to the Applicant in a timely matter as needs emerge from the review process. The Applicant was advised not to undertake any significant resource expenditures on additional studies until further guidance from the review process is provided by the Agency.

The Applicant was reminded that withdrawing the application and subsequently resubmitting it with new clinical data and CMC information utilizing an approved manufacturer of ——— was still a viable option. The Applicant indicated that the NDA would not be withdrawn at this time, but they may reconsider this option later in the review cycle if it appears that they will not be able to promptly supply the additional information needed to support the application, as identified in FDA Information Requests.

cc:
Orig NDA 50-756
HFD-540
HFD-540/DIV DIR/Wilkin/6.10.98
HFD-540/MO/Huene
HFD-540/CHEM/Vidra
HFD-540/PHARM/Mainigi
HFD-880/BIOPHARM/Noory
HFD-540/BIOSTAT/Farr
HFD-540/PROJ MGR/White/6.10.98
HFD-105/Weintraub
HFD-105/DeLap/6.10.98
HFD-105/Walling
HFD-001/Morrison

TELECONFERENCE MEMO