CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

21-341

CORRESPONDENCE

PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

January 16, 2001

Sharon Schmidt, Project Manager
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341**
<Tradename> (TBD)
(valdecoxib tablets)

Dear Ms. Schmidt:

Please refer to our New Drug Application for valdecoxib tablets which was delivered to FDA today.

At our pre-NDA meeting, we agreed to provide certain items in addition to the CDER compliant electronic submission (E-Sub) to aid the reviewers of the NDA. The following are provided in this submission as "desk copies" and review aids, and are not intended for archival treatment:

1. 15 desk copies of volumes 1-4 consisting of the administrative and summary sections of the NDA.
2. 3 CD-ROMs containing copies, in WORD 95 (v 6.0/7.0) of the text (no appendices) of the preclinical and clinical summary documents (provided to facilitate reviewer access to the tables embodied in the text), and the draft, unannotated labeling. A list of the summary documents is attached.

Should you have any questions regarding the content of the NDA E-Sub or this supplementary submission, please contact the undersigned.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
Tel: (847) 982-8606
Fax: (847) 982-8152
Enclosures

VALDECOXIB NDA SUMMARY DOCUMENTS

Item	Short Title:	Document Number:
3	Pharm Class/Rationale	N91-00-07-805
	Clinical Data Summary	N91-00-07-807
	Benefit/Risk	N91-00-07-808
	Summary of Clinical PK	N91-00-07-806
	Nonclinical Pharm/Tox	P6000155
5	Nonclinical Pharmacology	BRD00D2100
	Nonclinical Safety	P6000144
	Nonclinical PK and Metabolism	M6000015
6	Summary of PK Data and overall Conclusions	N91-00-07-810
	Summary of in vivo bioanalytical methods to support clinical trials of Valdecoxib	M6000299
	Summary of Clinical Pharmacology	N91-00-07-816
8	Background/ Overview	N91-00-07-815
	ISE	N91-00-07-817
	ISS	N91-00-07-818
	Drug Abuse/Overdosage	N91-00-07-819
Proposed Label	Valdecoxib Label - unannotated	--

PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

March 7, 2001

Corinne Moody
Science Policy Analyst
Controlled Substances Staff (HFD-009)
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

Re: **NDA 21-341**
<Tradename> (TBD)
(valdecoxib tablets)

Dear Ms. Moody:

Please refer to our New Drug Application (21-341) for valdecoxib tablets which was submitted to the Division of Anti-Inflammatory, Analgesic, and Ophthalmologic Drug Products (HFD-550) on January 15, 2001.

As requested by the Project Manager, Ms. Sharon Schmidt, I am providing a paper copy of the "Drug Abuse and Overdosage Information" (Document: N91-00-07-819) from Item 8 of that NDA, together with, at your request, a copy of Volume 1 of the NDA.

Should you have any questions regarding this submission, please contact the undersigned.

Sincerely,

Peter F. East

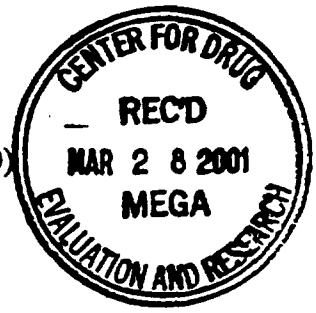
Peter F. East
Associate Director,
Regulatory Affairs
Tel: (847) 982-8606
Fax: (847) 982-8152
Enclosures

cc: Sharon Schmidt (HFD-550)

SEARLE

March 27, 2001

SEARLE
4901 SEARLE PARKWAY
SKOKIE, ILLINOIS 60077



Jonca Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: NDA 21-341
<Tradename> (TBD)
(valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application (21-341) for valdecoxib tablets which was submitted on January 15, 2001.

In discussions with the Project Manager (Ms. S. Schmidt) and reviewers from the Division, we have learned that the Item-specific Tables of Contents provided in this electronic submission are not "reviewer-friendly" since they provide only document numbers and not document titles. In order to address this problem, we provided, by e-mail on March 12, 2001, a revised TOC for the Pharm/Tox section (Item 5), which included details of each document in the same format that we have used in previous submissions. Full hyperlinking to the original NDA is included. Ms. Schmidt has advised that this revised format is acceptable.

We are therefore submitting, pursuant to 21 CFR 314.60, this amendment to NDA 21-341 to provide revised Tables of Contents for Items 5, 6 and 8. The revision extends to the level of detail only, and does not otherwise affect the content of the NDA. Each Table of Contents (TOC) is herewith provided electronically, on CD-ROM, in Acrobat file format. I hereby certify that the Item 5 Table of Contents provided herewith is identical to that provided as an example on March 12, 2001.

The new TOC files should be placed in the following folders:

Item 5: N21341\pharmtox (replacing pharmtoc.pdf)
Item 6: N21341\hpbio (replacing hpbiotoc.pdf)
Item 8: N21341\clinstat (replacing clintoc.pdf)

ORIGINAL

N21341\hpbio\hupharm

Note that this amendment does not affect the field copy of the NDA previously provided. Should you have any questions regarding the content of the NDA e-sub or this amendment, please contact the undersigned.

Sincerely,

Winfred M Begley

Peter F. East
Associate Director
Regulatory Affairs
Tel: (847) 982-8606
Fax: (847) 982-8152
Enclosure: CD-ROM

PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

pril 10, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341** (valdecoxib)
{Tradename TBD}

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In a FAX message dated April 5, 2001, the PK reviewer requested additional information regarding a report describing pharmacokinetic/pharmacodynamic modeling of the dose response in post-oral surgery pain models (N93-00-07-821).

n a FAX message dated April 4, 2001, the PK reviewer requested additional information egarding the warfarin interaction study (075) and other drug-drug interactions studies, which was followed by a request dated April 6, 2001 for further clarification of the warfarin interaction studies (075 and 013).

Our response to these requests is enclosed, both in electronic media (CD-ROM) and paper copy (appended) as appropriate.

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX).

Encl: CD-ROM
Attachments

ORIGINAL

ORIG AMENDMENT
BB

PHARMACIA

Pharmacia Corporation
P.O. Box 5110
Chicago, Illinois 60680-5110
tel 847.982.7000
www.pharmacia.com

April 23, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
And Ophthlamologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation & Research
Food and Drug Administration
2201 Corporate Blvd.
Rockville, Maryland 20850

RE: NDA 21-341
(valdecoxib)
{Tradename TBD}

Dr. Bull:

refer to our New Drug Application for valdecoxib tablets, which is currently under

X message dated April 18, 2001, the PK reviewer asked:

provide individual subjects plasma and urine concentration data and individual subject meters along with individual subject demographics and treatment groups for the replicate BE studies. These study numbers are N91-97-02-009 and N91-99-02-050. Please provide electronically in Excel format. The data for only study N91-99-02-056 has been provided Also provide the same for Study N91-99-02-078, as this has not been provided earlier.

CD-ROM containing the requested data files in Excel format. Please note, urine data for study N91-99-02-078.

additional questions regarding the NDA, please contact the undersigned.

PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

June 8, 2001

Kent Johnson, M.D.
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341**
<Tradename> (TBD)
(valdecoxib tablets)
Desk Copy CD-ROMs
to Kent

Dear Dr. Johnson:

Please refer to our New Drug Application (21-341) for valdecoxib tablets which was submitted on January 15, 2001.

As discussed by telephone (June 5, 2001) to assist you in your review, we are providing, on the enclosed CD-ROMs, selected sections of the NDA as follows:

Disk 1 - Section 3 (Clinical Summary Docs.)
This disk contains the overall NDA Table of Contents (ndatoc.pdf) and the clinical summary documents from Section 3 (Summaries) of the NDA. Opening the CD-ROM in "My Computer" and double-clicking on the **ndatoc.pdf** file will launch Adobe Acrobat and allow you to navigate **only** to Section 2 (Labeling) and to Section 3 (Summaries) for the clinical summaries only. Other Section 3 summaries (CMC, Pharmtox) have been omitted; therefore these links will not operate from the Section 3 Summary Table of Contents (ToC).

Disk 2 - Section 8 (Clinical Data)
This disk contains the Section 8 clinical data in the folder 'clinstat' which also includes a ToC for this section (clintoc.pdf). Double-clicking on the **clinistat** folder and then on the **clintoc.pdf** will launch Adobe Acrobat and allow you to navigate through Section 8. Note however, that some documents have been omitted to save space and to allow this Section to fit on a single CD-ROM (crfverification.pdf; investigatorcvs.pdf; irbandinformedconsent.pdf; listofindsandndas.pdf; transferofobligations.pdf), therefore these links will not operate from the ToC. Please refer to the complete NDA for these items.

As these CD-ROMS have been prepared to "stand-alone" from the complete NDA in order to make them easily portable, only those links to documents provided on the individual CD-ROM will operate. For example, you will not be able to open the Section 8 ToC on Disk 2 from the NDA ToC link on Disk 1, unless you first copy both disks to a folder on your computer hard drive. Even so, this should allow you to continue your medical review from the CD-ROM copies without having to load the entire NDA to your computer. I hope that this proves helpful to you.

Should you have any questions about this submission, please do not hesitate to contact me.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
Tel: (847) 982-8606
Fax: (847) 982-8152

Encl: CD-ROM (2 disks)
cc: Sharon Schmidt

NDA ORIG AMENDMENT PHARMACIA

BP

Searle
4901 Searle Parkway
Skokie, Illinois 60077

June 29 2001

Jonca C. Bull, M.D., Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341** (valdecoxib)
{Tradename TBD}

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In a telephone discussion on June 21, 2001, the Pharmacology/Toxicology reviewer (Dr. Josie Yang) raised several questions regarding the pre and post-natal toxicity study (SA4776) with valdecoxib.

Our response to these requests is attached, and is also provided on the enclosed disk (MS Word document "SA4776 Rat Seg III.doc").

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX).

ORIGINAL

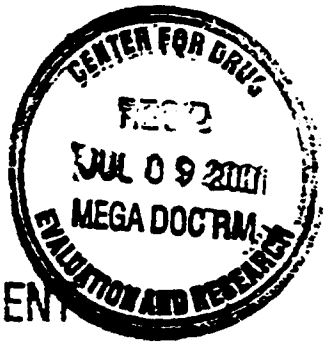
Sent disc/contents via email 7/9 mm

PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

July 6, 2001

N-000/BM



Jonca C. Bull, M.D., Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

NDA ORIG AMENDMENT

Re: **NDA 21-341** (valdecoxib)
{Tradename TBD}

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In telephone discussions on June 5, 8, 13 and 20, Dr. Kent Johnson asked a series of questions regarding clinical studies in the NDA. Our responses to these questions are provided in the attached document and electronically on the enclosed floppy disk.

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX).

Encl: 3½" Floppy Disk
Attachment

ORIGINAL

NEW CORRESP
NC

PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

August 2, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341**
——— (valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review and to the 120-day safety update submitted May 16, 2001.

In an e-mail message received July 30, the Project Manager, Ms. Sharon Schmidt, requested a copy of the 120-day safety update in electronic format. This document is provided on the enclosed CD-ROM.

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX)

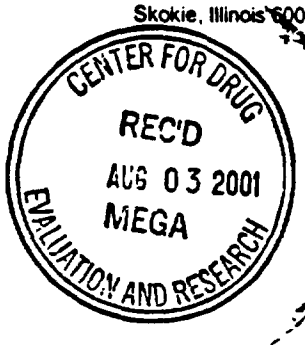
Encl: CD-ROM

ORIGINAL

PHARMACIA

DRUG AMENDMENT BM

Searle
4901 Searle Parkway
Skokie, Illinois 60077



August 2, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: NDA 21-341
(valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In an e-mail message received July 2, Dr. Kent Johnson asked a series of questions regarding clinical studies in the NDA. Our responses to these questions are provided in the attached document and electronically on the enclosed CD-ROM. To access electronically, please open the document file "responses.doc".

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX)

Encl: CD-ROM
Attachment

ORIGINAL

PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

August 9, 2001

Sharon Schmidt,
Project Manager
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341**
<Tradename> (TBD)
(valdecoxib tablets)

Dear Sharon:

Please refer to our New Drug Application (21-341) for valdecoxib tablets which was submitted on January 15, 2001 and to a response to questions from Dr. Kent Johnson which we provided on CD-ROM in a submission dated August 2, 2001.

As discussed with you and Dr. Johnson, the CD-ROM appears to be inoperable. As an alternative, I am herewith submitting a "desk copy" of the content of that CD-ROM pending resolution of the problem. I have annotated the original response and index (Tab. 1) to the electronic files with the location of the referenced file in the attachments (Tabs 2-11).

Should you have any questions about this submission, please do not hesitate to contact me.

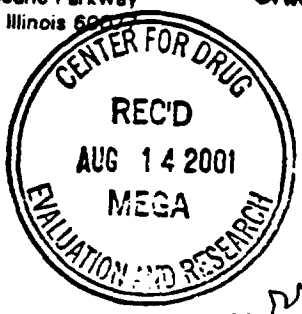
Sincerely,

Peter F. East
Associate Director,
Regulatory Affairs
Tel: (847) 982-8606
Fax: (847) 982-8152

Encl:

Searle
4901 Searle Parkway
Skokie, Illinois 6007

ORIG AMENDMENT
BB



8/15/01

ask Dr. Sun to get them dis. to Veneta today

August 13, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341** (valdecoxib)
Tablets

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In an e-mail message dated August 8, 2001, the PK reviewer asked:

> *Has the sponsor attempted to classify valdecoxib under the Biopharm Classification System by characterizing the solubility and permeability of the drug? If yes, could the sponsor provide this information as soon as possible? If already provided, could the sponsor indicate where this information exists in the original submission?*

Valdecoxib is a low-solubility-high-permeability drug (biopharmaceutical classification system II). High permeability was established in a clinical study ("An Open Label, Randomized, Single Dose Crossover Study To Compare The Pharmacokinetics And Bioavailability Of Intravenous And Oral Tablet Valdecoxib Formulations In Healthy Adult Subjects"; Report: N91-00-06-070) where the absolute bioavailability of valdecoxib was shown to be 83%. The solubility is described in the CMC document "Summary of Physical and Chemical Characteristics of Valdecoxib Drug Substance (PDR-00S-0705) as "practically insoluble" in water (10 mcg/mL at pH 7 and 25°C) according to the USP classification system.

In an e-mail message dated July 30, 2001, the PK reviewer asked, regarding the Food and Antacid effects study (018):

> *Please calculate the 90% CI for the ratios of the means of valdecoxib AUC(0-lqc), AUC (0-inf), Cmax and Xu(0-48) for High Fat, Medium Fat and Antacid effects and report the results electronically.*

The 90% CI tables for these values for the N91-018 study are appended.

ORIGINAL

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX).

Attachment

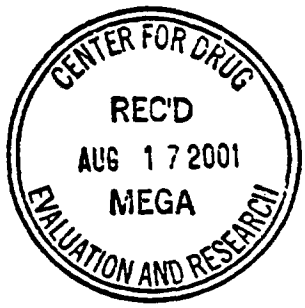
PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

ORIG AMENDMENT
BS

August 16, 2001

Jonca C. Bull, M.D., Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850



Re: **NDA 21-341**
~~~~ (valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In an e-mail message dated August 13, 2001, the Statistical reviewer made several requests regarding the PK/PD modeling report: Summary Of Population Pharmacodynamic Modeling In Postsurgical Dental Patients Following Oral Administration Of Valdecoxib; Document Number: N91-00-07-823.

Our response to these requests is enclosed, both in electronic media (CD-ROM) and paper copy (appended) as appropriate.

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX).

Encl: CD-ROM
Attachment

ORIGINAL

QRS632R
~~~~

Kent - 8/29

PHARMACIA

Searle
4901 Searle Parkway
Skokie, Illinois 60077

N-000/BM

August 24, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341**
——— (valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In requests received July 30 and August 7, 2001 Dr. Kent Johnson asked a number of questions regarding clinical studies in the NDA. Our responses to these questions are provided in the attached document and electronically on the enclosed CD-ROM. To access electronically, please open the document file "valdecoxib NDA responses.doc" on the CD-ROM.

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX)

Encl: CD-ROM
Attachment

QRS617/622/627/629R

ORIGINAL

Searle
4901 Searle Parkway
Skokie, Illinois 60077

August 31, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341**
——— (valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In a telephone discussion on August 14, 2001, Dr. Rao Puttagunta made two requests regarding CMC information in the NDA. Our responses to these questions are provided in the attached documents:

VALD-US-01; 23 August 2001

VALD-US-02; 23 August 2001

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX)

Attachment

ORIGINAL

Pharmacia Corporation
Global Regulatory Affairs
4901 Searle Parkway
Skokie, Illinois 60077

NC

September 10, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic, and
Ophthalmic Drug Products, HFD-550
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Boulevard
Rockville, Maryland 20857

Re: NDA 21-341
(valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review. On July 19, 2001 we submitted for your consideration the proprietary name ——— for valdecoxib tablets. Subsequently, we became aware of the proprietary name "Valcyte" associated with an approved NDA for valganciclovir HCl.

Following discussion of this situation with the Project manager, I was informed that the expert [OPDRA] panel had met and had identified both Valcyte and Visudyne as potential conflicts. The panel noted that both of these names are very close to

We therefore wish to submit, as an alternative, the proprietary name "**BEXTRA**" for OPDRA review and consideration.

Please note that the previously submitted draft packaging (for the 10 mg tablets only) would remain the same except for the name change. We are preparing draft packaging with the new name that will be submitted for consideration at the earliest opportunity. We would appreciate your early response concerning Bextra and any additional comments that you can provide or

Please direct any comments or questions concerning this submission to my attention.

Sincerely,

Peter F. East

Peter F. East
Associate Director
Regulatory Affairs
(847) 982-8606
(847) 982-8152 FAX

ORIGINAL

Pharmacia Corporation
Global Regulatory Affairs
4901 Searle Parkway
Skokie, Illinois 60077

BM

September 13, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341**
(valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In an e-mail message received September 4, 2001, Dr. Kent Johnson requested some additional analyses of valdecoxib clinical trials. Our response to these three requests is attached.

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F. East

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX)

Attachment

QRS641R

ORIGINAL

Pharmacia Corporation
Global Regulatory Affairs
4901 Searle Parkway
Skokie, Illinois 60077

DIM
2 Issa

September 27, 2001

Jonca C. Bull, M.D., Acting Director
Division of Anti-Inflammatory, Analgesic,
and Ophthalmologic Drug Products (HFD-550)
Office of Drug Evaluation V
Center for Drug Evaluation and Research
Food and Drug Administration
9201 Corporate Blvd.
Rockville, MD 20850

Re: **NDA 21-341**
(valdecoxib tablets)

Dear Dr. Bull:

Please refer to our New Drug Application for valdecoxib tablets, which is currently under review.

In an e-mail message received September 13, 2001, Dr. D. Throckmorton requested an analysis of renal endpoints in a valdecoxib clinical trial (062). Our response to this request is attached and is also provided in MS Word format on the enclosed 3¼" disk.

Should you have additional questions regarding the NDA, please contact the undersigned.

Sincerely,

Peter F. East

sent info to Doug 9/25/01 via email

Peter F. East
Associate Director,
Regulatory Affairs
(847) 982-8606
(847) 982-8152 (FAX)

Attachment
cc: Dr. D. Throckmorton (HFD-110)

QRS643R

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

NDA 21-341

G.D. Searle LLC Subsidary of Pharmacia Corp.
Attention: Peter East
Associate Director, Regulatory Affairs
4901 Searle Parkway
Skokie, Illnois 60077

Dear Mr. East:

We have received your new drug application (NDA) submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for the following:

Name of Drug Product: valdecoxib 5,10, 20 and 40 mg tablets
(tradename not determined at this time)

Review Priority Classification: Standard (S)

Date of Application: January 15, 2001

Date of Receipt: January 16, 2001

Our Reference Number: NDA 21-341

Unless we notify you within 60 days of our receipt date that the application is not sufficiently complete to permit a substantive review, this application will be filed under section 505(b) of the Act on March 16, 2001 in accordance with 21 CFR 314.101(a). If the application is filed, the primary user fee goal date will be November 16, 2001 and the secondary user fee goal date will be January 16, 2001.

Be advised that, as of April 1, 1999, all applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (63 *FR* 66632). We note that you were granted a deferral; please refer to the PreNDA Meeting Minutes of November 20, 2000.

If you believe that this drug qualifies for a waiver of the pediatric study requirement, you should submit a request for a waiver with supporting information and documentation in accordance with the provisions of 21 CFR 314.55 within 60 days from the date of this letter. We will make a determination whether to grant or deny a request for a waiver of pediatric studies during the review of the application. In no case, however, will the determination be made later than the date action is taken on the application. If a waiver is not granted we will ask you to submit your pediatric drug development plans within 120 days from the date of denial of the waiver.

Pediatric studies conducted under the terms of section 505A of the Federal Food, Drug, and Cosmetic Act may result in additional marketing exclusivity for certain products (pediatric exclusivity). You should refer to the *Guidance for Industry on Qualifying for Pediatric Exclusivity* (available on our web site at www.fda.gov/cder/pediatric) for details. If you wish to qualify for pediatric exclusivity you should submit a "Proposed Pediatric Study Request" (PPSR) in addition to your plans for pediatric drug development described above. We recommend that you submit a Proposed Pediatric Study Request within 120 days from the date of this letter. If you are unable to meet this time frame but are interested in pediatric exclusivity, please notify the division in writing. FDA generally will not accept studies submitted to an NDA before issuance of a Written Request as responsive to a Written Request. Sponsors should obtain a Written Request before submitting pediatric studies to an NDA. If you do not submit a PPSR or indicate that you are interested in pediatric exclusivity, we will review your pediatric drug development plan and notify you of its adequacy. Please note that satisfaction of the requirements in 21 CFR 314.55 alone may not qualify you for pediatric exclusivity. FDA does not necessarily ask a sponsor to complete the same scope of studies to qualify for pediatric exclusivity as it does to fulfill the requirements of the pediatric rule.

Under 21 CFR 314.102(c) of the new drug regulations, you may request an informal conference with this Division (to be held approximately 90 days from the above receipt date) for a brief report on the status of the review but not on the application's ultimate approvability. Alternatively, you may choose to receive such a report by telephone.

Please cite the NDA number listed above at the top of the first page of any communications concerning this application. All communications concerning this NDA should be addressed as follows:

U.S. Postal Service:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Anti-Inflammatory, Analgesic and Ophthalmic Drug Products, HFD-550
Attention: Document Control Room
5600 Fishers Lane
Rockville, Maryland 20857

Courier/Overnight Mail:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Anti-Inflammatory, Analgesic and Ophthalmic Drug Products, HFD-550
Attention: Document Control Room
9201 Corporate Blvd.
Rockville, Maryland 20850-3202

If you have any questions, call Sharon Schmidt, M.S., Project Manager, at (301) 827-2090.

Sincerely,

{See appended electronic signature page}

Leslie Vaccari
Chief, Project Management Staff
Division of Anti-Inflammatory, Analgesic and Ophthalmic Drug Products, HFD-550
Office of Drug Evaluation V
Center for Drug Evaluation and Research