

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

21-479

**ADMINISTRATIVE and CORRESPONDENCE
DOCUMENTS**

**ELAN BIOPHARMACEUTICALS
NEW DRUG APPLICATION**

**ZYDIS® SELEGILINE
ITEM 1 (CONT'D)**

1.2 ITEM 13—PATENT INFORMATION

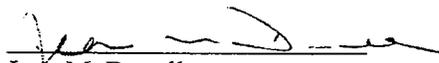
In accordance with the Drug Price Competition and Patent Term Restoration Act of 1984, Applicant provides the patent information identified below with respect to Applicant's New Drug Application relating to the following drug product:

Trade Name:	Zelapar™
Active Ingredient:	Selegiline Hydrochloride
Strength(s):	1.25 mg
Dosage Form:	Tablet
Applicant:	Elan Pharmaceuticals, Inc.
Approval Date:	N/A

The undersigned declares that the U.S. Patent identified below covers the selegiline hydrochloride drug product for which Applicant seeks approval under section 505 of the Federal Food, Drug and Cosmetic Act:

- | | | |
|----|-----------------------|-----------------------------|
| 1. | U.S. Patent No.: | 5,648,093 |
| 2. | Expiration Date: | July 15, 2014 |
| 3. | Type of Patent: | Drug Product (Composition) |
| 4. | Name of Patent Owner: | Janssen Pharmaceutica, Inc. |

Date: March 25, 2002

Signature: 

Name:

Jean M. Duvall

Title:

Vice President, Intellectual Property
Elan Pharmaceuticals, Inc.

ELAN BIOPHARMACEUTICALS
NEW DRUG APPLICATION

ZYDIS® SELEGILINE
ITEM 1 (CONT'T)

1.3 Item 14—PATENT CERTIFICATION

See Item 1.2.

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On Original

EXCLUSIVITY SUMMARY

NDA # 21-479

SUPPL #

HFD # 120

Trade Name Zelapar

Generic Name zydis selegiline

Applicant Name Valeant Pharmaceuticals

Approval Date, If Known June 14,2006

PART I IS AN EXCLUSIVITY DETERMINATION NEEDED?

1. An exclusivity determination will be made for all original applications, and all efficacy supplements. Complete PARTS II and III of this Exclusivity Summary only if you answer "yes" to one or more of the following questions about the submission.

a) Is it a 505(b)(1), 505(b)(2) or efficacy supplement?

YES NO

If yes, what type? Specify 505(b)(1), 505(b)(2), SE1, SE2, SE3,SE4, SE5, SE6, SE7, SE8

505b2

c) Did it require the review of clinical data other than to support a safety claim or change in labeling related to safety? (If it required review only of bioavailability or bioequivalence data, answer "no.")

YES NO

If your answer is "no" because you believe the study is a bioavailability study and, therefore, not eligible for exclusivity, EXPLAIN why it is a bioavailability study, including your reasons for disagreeing with any arguments made by the applicant that the study was not simply a bioavailability study.

If it is a supplement requiring the review of clinical data but it is not an effectiveness supplement, describe the change or claim that is supported by the clinical data:

d) Did the applicant request exclusivity?

YES NO

If the answer to (d) is "yes," how many years of exclusivity did the applicant request?

3

e) Has pediatric exclusivity been granted for this Active Moiety?

YES NO

If the answer to the above question in YES, is this approval a result of the studies submitted in response to the Pediatric Written Request?

IF YOU HAVE ANSWERED "NO" TO ALL OF THE ABOVE QUESTIONS, GO DIRECTLY TO THE SIGNATURE BLOCKS AT THE END OF THIS DOCUMENT.

2. Is this drug product or indication a DESI upgrade?

YES NO

IF THE ANSWER TO QUESTION 2 IS "YES," GO DIRECTLY TO THE SIGNATURE BLOCKS ON PAGE 8 (even if a study was required for the upgrade).

PART II FIVE-YEAR EXCLUSIVITY FOR NEW CHEMICAL ENTITIES

(Answer either #1 or #2 as appropriate)

1. Single active ingredient product.

Has FDA previously approved under section 505 of the Act any drug product containing the same active moiety as the drug under consideration? Answer "yes" if the active moiety (including other esterified forms, salts, complexes, chelates or clathrates) has been previously approved, but this particular form of the active moiety, e.g., this particular ester or salt (including salts with hydrogen or coordination bonding) or other non-covalent derivative (such as a complex, chelate, or clathrate) has not been approved. Answer "no" if the compound requires metabolic conversion (other than deesterification of an esterified form of the drug) to produce an already approved active moiety.

YES NO

If "yes," identify the approved drug product(s) containing the active moiety, and, if known, the NDA #(s).

NDA#

NDA#

Appears This Way
On Original

NDA#

2. Combination product.

If the product contains more than one active moiety (as defined in Part II, #1), has FDA previously approved an application under section 505 containing any one of the active moieties in the drug product? If, for example, the combination contains one never-before-approved active moiety and one previously approved active moiety, answer "yes." (An active moiety that is marketed under an OTC monograph, but that was never approved under an NDA, is considered not previously approved.)

YES NO

If "yes," identify the approved drug product(s) containing the active moiety, and, if known, the NDA #(s).

NDA#

NDA#

NDA#

IF THE ANSWER TO QUESTION 1 OR 2 UNDER PART II IS "NO," GO DIRECTLY TO THE SIGNATURE BLOCKS ON PAGE 8. (Caution: The questions in part II of the summary should only be answered "NO" for original approvals of new molecular entities.)
IF "YES," GO TO PART III.

PART III THREE-YEAR EXCLUSIVITY FOR NDAs AND SUPPLEMENTS

To qualify for three years of exclusivity, an application or supplement must contain "reports of new clinical investigations (other than bioavailability studies) essential to the approval of the application and conducted or sponsored by the applicant." This section should be completed only if the answer to PART II, Question 1 or 2 was "yes."

1. Does the application contain reports of clinical investigations? (The Agency interprets "clinical investigations" to mean investigations conducted on humans other than bioavailability studies.) If the application contains clinical investigations only by virtue of a right of reference to clinical investigations in another application, answer "yes," then skip to question 3(a). If the answer to 3(a) is "yes" for any investigation referred to in another application, do not complete remainder of

summary for that investigation.

YES NO

IF "NO," GO DIRECTLY TO THE SIGNATURE BLOCKS ON PAGE 8.

2. A clinical investigation is "essential to the approval" if the Agency could not have approved the application or supplement without relying on that investigation. Thus, the investigation is not essential to the approval if 1) no clinical investigation is necessary to support the supplement or application in light of previously approved applications (i.e., information other than clinical trials, such as bioavailability data, would be sufficient to provide a basis for approval as an ANDA or 505(b)(2) application because of what is already known about a previously approved product), or 2) there are published reports of studies (other than those conducted or sponsored by the applicant) or other publicly available data that independently would have been sufficient to support approval of the application, without reference to the clinical investigation submitted in the application.

(a) In light of previously approved applications, is a clinical investigation (either conducted by the applicant or available from some other source, including the published literature) necessary to support approval of the application or supplement?

YES NO

If "no," state the basis for your conclusion that a clinical trial is not necessary for approval AND GO DIRECTLY TO SIGNATURE BLOCK ON PAGE 8:

(b) Did the applicant submit a list of published studies relevant to the safety and effectiveness of this drug product and a statement that the publicly available data would not independently support approval of the application?

YES NO

(1) If the answer to 2(b) is "yes," do you personally know of any reason to disagree with the applicant's conclusion? If not applicable, answer NO.

YES NO

If yes, explain:

(2) If the answer to 2(b) is "no," are you aware of published studies not conducted or sponsored by the applicant or other publicly available data that could independently demonstrate the safety and effectiveness of this drug product?

YES NO

If yes, explain:

- (c) If the answers to (b)(1) and (b)(2) were both "no," identify the clinical investigations submitted in the application that are essential to the approval:

Z/SE1/97/026 - IND 47,005

Z/SE1/97/025 - IND 47,005

Studies comparing two products with the same ingredient(s) are considered to be bioavailability studies for the purpose of this section.

3. In addition to being essential, investigations must be "new" to support exclusivity. The agency interprets "new clinical investigation" to mean an investigation that 1) has not been relied on by the agency to demonstrate the effectiveness of a previously approved drug for any indication and 2) does not duplicate the results of another investigation that was relied on by the agency to demonstrate the effectiveness of a previously approved drug product, i.e., does not redemonstrate something the agency considers to have been demonstrated in an already approved application.

a) For each investigation identified as "essential to the approval," has the investigation been relied on by the agency to demonstrate the effectiveness of a previously approved drug product? (If the investigation was relied on only to support the safety of a previously approved drug, answer "no.")

Investigation #1 YES NO

Investigation #2 YES NO

If you have answered "yes" for one or more investigations, identify each such investigation and the NDA in which each was relied upon:

b) For each investigation identified as "essential to the approval", does the investigation duplicate the results of another investigation that was relied on by the agency to support the effectiveness of a previously approved drug product?

Investigation #1 YES NO

Investigation #2 YES NO

If you have answered "yes" for one or more investigation, identify the NDA in which a similar investigation was relied on:

c) If the answers to 3(a) and 3(b) are no, identify each "new" investigation in the application or supplement that is essential to the approval (i.e., the investigations listed in #2(c), less any that are not "new"):

IND 47,005 - Z/SEL/97/026 & Z/SEL/97/025

4. To be eligible for exclusivity, a new investigation that is essential to approval must also have been conducted or sponsored by the applicant. An investigation was "conducted or sponsored by" the applicant if, before or during the conduct of the investigation, 1) the applicant was the sponsor of the IND named in the form FDA 1571 filed with the Agency, or 2) the applicant (or its predecessor in interest) provided substantial support for the study. Ordinarily, substantial support will mean providing 50 percent or more of the cost of the study.

a) For each investigation identified in response to question 3(c): if the investigation was carried out under an IND, was the applicant identified on the FDA 1571 as the sponsor?

Investigation #1
IND # 47,005 YES ! NO
! Explain:

Investigation #2
IND # 47,005 YES ! NO
! Explain:

(b) For each investigation not carried out under an IND or for which the applicant was not identified as the sponsor, did the applicant certify that it or the applicant's predecessor in interest provided substantial support for the study?

Investigation #1 !
! YES ! NO
Explain: ! Explain:

Investigation #2 !
! YES ! NO
Explain: ! Explain:

(c) Notwithstanding an answer of "yes" to (a) or (b), are there other reasons to believe that the applicant should not be credited with having "conducted or sponsored" the study? (Purchased studies may not be used as the basis for exclusivity. However, if all rights to the drug are purchased (not just studies on the drug), the applicant may be considered to have sponsored or conducted the studies sponsored or conducted by its predecessor in interest.)

YES NO

If yes, explain:

Name of person completing form: Teresa Wheelous
Title: Sr. Regulatory Management Officer
Date: 11/07/06

Name of Office/Division Director signing form: Dr. Russell Katz
Title: Division Director

Form OGD-011347; Revised 05/10/2004; formatted 2/15/05

**This is a representation of an electronic record that was signed electronically and
this page is the manifestation of the electronic signature.**

/s/

Russell Katz
11/13/2006 09:31:07 AM

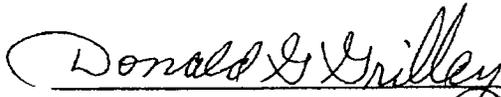
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On Original

ELAN BIOPHARMACEUTICALS
NEW DRUG APPLICATION

ZYDIS® SELEGILINE
ITEM 1 (CONT'D)

1.4 ITEM 16—DEBARMENT CERTIFICATION

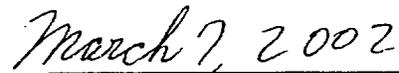
On behalf of Elan Pharmaceuticals, I hereby certify that we did not and will not use in any capacity the services of an individual, partnership, corporation, or association debarred under subsections (a) or (b) of Section 306 of the Federal Food, Drug and Cosmetic Act in connection with NDA 21-479 for Zelapar (selegiline hydrochloride).



Donald G. Grilley, RPh, M.A.

Director, Regulatory Affairs

Elan Pharmaceuticals, Inc.



Date

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On Original

NDA/EFFICACY SUPPLEMENT ACTION PACKAGE CHECKLIST

Volume 1

Application Information		
NDA 21-479		
Drug: Zelapar (zydis selegiline orally disintegrating) Tablets 1.25 mg	Applicant: Valeant (formerly Elan) Pharmaceuticals International	
RPM: T. Wheelous	HFD- 120	Phone # 301-796-1161
Application Type: 505(b)(1) (<input checked="" type="checkbox"/>) 505(b)(2)	Reference Listed Drug (NDA #, Drug name): Eldepryl (selegiline) Tablets NDA 19-334	
❖ Application Classifications:		
<ul style="list-style-type: none"> • Review priority 	<input checked="" type="checkbox"/> Standard <input type="checkbox"/> Priority	
<ul style="list-style-type: none"> • Chem class (NDAs only) 		
<ul style="list-style-type: none"> • Other (e.g., orphan, OTC) 		
❖ User Fee Goal Dates		
		June 14, 2006
❖ Special programs (indicate all that apply)		
		<input checked="" type="checkbox"/> None Subpart H <input type="checkbox"/> 21 CFR 314.510 (accelerated approval) <input type="checkbox"/> 21 CFR 314.520 (restricted distribution) <input type="checkbox"/> Fast Track <input type="checkbox"/> Rolling Review
❖ User Fee Information		
<ul style="list-style-type: none"> • User Fee 	<input checked="" type="checkbox"/> Paid	
<ul style="list-style-type: none"> • User Fee waiver 	<input type="checkbox"/> Small business <input type="checkbox"/> Public health <input type="checkbox"/> Barrier-to-Innovation <input type="checkbox"/> Other	
<ul style="list-style-type: none"> • User Fee exception 	<input type="checkbox"/> Orphan designation <input type="checkbox"/> No-fee 505(b)(2) <input type="checkbox"/> Other	
❖ Application Integrity Policy (AIP)		
<ul style="list-style-type: none"> • Applicant is on the AIP 	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<ul style="list-style-type: none"> • This application is on the AIP 	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<ul style="list-style-type: none"> • Exception for review (Center Director's memo) 		
<ul style="list-style-type: none"> • OC clearance for approval 		
A		
Debarment certification: verified that qualifying language (e.g., willingly, knowingly) was not used in certification and certifications from foreign applicants are co-signed by U.S. agent.		<input type="checkbox"/> Verified
B		
Patent		
<ul style="list-style-type: none"> • Information: Verify that patent information was submitted 	<input type="checkbox"/> Verified	
<ul style="list-style-type: none"> • Patent certification [505(b)(2) applications]: Verify type of certifications submitted 21 CFR 314.50(i)(1)(i)(A)(3): The date on which the patent will expire. (Paragraph III certification)	<input type="checkbox"/> I <input type="checkbox"/> II <input type="checkbox"/> III <input type="checkbox"/> IV 21 CFR 314.50(i)(1) <input type="checkbox"/> (ii) <input type="checkbox"/> (iii)	
"Certifications for the listed drug. As provided in Section 1.2 and 1.3 (Item 1, Volume 1, Page15-16) of the original Zelapar™		

<p>NA, filed in March 2002, the patent certification for the drug was addressed by providing the patent expiration date (e.g., 15 July 2014)(Attachment 2). Although not explicitly stated as such, this statement is essentially a "Paragraph III Certification," as stipulated in §314.50(i)(1)(i)(a)(3)."</p>	
<p>Patent number(s): 5,648,093 exp: July 15, 2014 Drug Product (Composition)</p>	
<ul style="list-style-type: none"> For paragraph IV certification, verify that the applicant notified the patent holder(s) of their certification that the patent(s) is invalid, unenforceable, or will not be infringed (certification of notification and documentation of receipt of notice). 	() Verified
<p>C Exclusivity Summary (approvals only)</p>	
<p>D Administrative Reviews (Project Manager, ADRA) (indicate date of each review)</p>	5-23-06 9/7/05 → Appendix B
(General Information)	
<p>E Actions</p>	
<ul style="list-style-type: none"> Proposed action 	(X) AP () TA () AE () NA
<ul style="list-style-type: none"> Previous actions (specify type and date for each action taken) 	AE - 2/7/03
<ul style="list-style-type: none"> Status of advertising (approvals only) 	() Materials requested in AP letter () Reviewed for Subpart H
<p>F Public communications</p>	
<ul style="list-style-type: none"> Press Office notified of action (approval only) 	() Yes (X) Not applicable
<ul style="list-style-type: none"> Indicate what types (if any) of information dissemination are anticipated 	() None () Press Release () Talk Paper () Dear Health Care Professional Letter
<p>G Labeling (package insert, patient package insert (if applicable), Med Guide (if applicable))</p>	
<ul style="list-style-type: none"> Division's proposed labeling (only if generated after latest applicant submission of labeling) 	
<ul style="list-style-type: none"> Most recent applicant-proposed labeling 	
<ul style="list-style-type: none"> Original applicant-proposed labeling 	
<ul style="list-style-type: none"> Labeling reviews (including DDMAC, Office of Drug Safety trade name review, nomenclature reviews) and minutes of labeling meetings (indicate dates of reviews and meetings) 	DMETS - 6/2/06 DMETS - 1/26/06 DDMAC - 9/1/05 DMETS - 9/14/05 DMETS - 7/5/02
<ul style="list-style-type: none"> Other relevant labeling (e.g., most recent 3 in class, class labeling) 	
<p>H Labels (immediate container & carton labels)</p>	
<ul style="list-style-type: none"> Division proposed (only if generated after latest applicant submission) 	
<ul style="list-style-type: none"> Applicant proposed 	
<ul style="list-style-type: none"> Reviews 	
<p>Post-marketing commitments</p>	
<ul style="list-style-type: none"> Agency request for post-marketing commitments 	

<ul style="list-style-type: none"> Documentation of discussions and/or agreements relating to post-marketing commitments 	
J Outgoing correspondence (i.e., letters, E-mails, faxes)	
K Memoranda and Telecons	
L Minutes of Meetings	
<ul style="list-style-type: none"> EOP2 meeting (indicate date) 	1-11-99
<ul style="list-style-type: none"> Pre-NDA meeting (indicate date) 	11-7-01 & 1-30-01
<ul style="list-style-type: none"> Pre-Approval Safety Conference (indicate date; approvals only) 	May 2006
<ul style="list-style-type: none"> Other – End of Review Telecon (see Tab K) 	4-25-03
M Advisory Committee Meeting	
N Federal Register Notices, DESI documents, NAS, NRC (if any are applicable)	N/A
O Summary Reviews (e.g., Office Director, Division Director, Medical Team Leader) (<i>indicate date for each review</i>)	10/24/05 – Group Leader 2/7/03 – Div. Director 2/7/03- Team Leader
P Final review(s) (<i>indicate date for each review</i>)	6/13/06 1-10-03

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On Original

VOLUME 2

Q Microbiology (efficacy) review(s) <i>(indicate date for each review)</i>	12-10-02
R Safety Update review(s) <i>(indicate date or location if incorporated in another review)</i>	1-10-03
S Pediatric Page(separate page for each indication addressing status of all age groups)	
T Statistical review(s) <i>(indicate date for each review)</i>	6-9-03 1/16/03
U Biopharmaceutical review(s) <i>(indicate date for each review)</i>	5/16/06 9/21/05, 9-15-05 5-20-02
❖ Controlled Substance Staff review(s) and recommendation for scheduling <i>(indicate date for each review)</i>	N/A
V Clinical Inspection Review Summary (DSI)	
• Clinical studies	
• Bioequivalence studies	
CMC Information	
W CMC review(s) <i>(indicate date for each review)</i>	6-8-04 5-29-03 2-4-03
❖ Environmental Assessment	
• Categorical Exclusion <i>(indicate review date)</i>	
• Review & FONSI <i>(indicate date of review)</i>	
• Review & Environmental Impact Statement <i>(indicate date of each review)</i>	
❖ Micro (validation of sterilization & product sterility) review(s) <i>(indicate date for each review)</i>	12-10-02 1-13-03
❖ Facilities inspection (provide EER report)	Date completed: () Acceptable () Withhold recommendation
❖ Methods validation	() Completed () Requested () Not yet requested
Additional Pharmacology Information	
XYZ ❖ Pharm/tox review(s), including referenced IND reviews <i>(indicate date for each review)</i>	2-6-03 Reviewer & Team Leader
❖ Nonclinical inspection review summary	
❖ Statistical review(s) of carcinogenicity studies <i>(indicate date for each review)</i>	
❖ CAC/ECAC report	

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NDA/EFFICACY SUPPLEMENT ACTION PACKAGE CHECKLIST

Volume 1

Application Information

NDA 21-479		
Drug: Zelapar (zydis selegiline orally disintegrating) Tablets		Applicant: Valeant (formerly Elan) Pharmaceuticals International
RPM: T. Wheelous		HFD- 120 Phone # 301-796-1161
Application Type: 505(b)(1) (<input checked="" type="checkbox"/>) 505(b)(2)		Reference Listed Drug (NDA #, Drug name): Eldepryl (selegiline) Tablets NDA 19-334
❖ Application Classifications:		
• Review priority		(<input checked="" type="checkbox"/>) Standard () Priority
• Chem class (NDAs only)		
• Other (e.g., orphan, OTC)		
❖ User Fee Goal Dates		
		September 30, 2005
❖ Special programs (indicate all that apply)		
		(<input checked="" type="checkbox"/>) None Subpart H () 21 CFR 314.510 (accelerated approval) () 21 CFR 314.520 (restricted distribution) () Fast Track () Rolling Review
❖ User Fee Information		
• User Fee		(<input checked="" type="checkbox"/>) Paid
• User Fee waiver		() Small business () Public health () Barrier-to-Innovation () Other
• User Fee exception		() Orphan designation () No-fee 505(b)(2) () Other
❖ Application Integrity Policy (AIP)		
• Applicant is on the AIP		() Yes () No
• This application is on the AIP		() Yes () No
• Exception for review (Center Director's memo)		
• OC clearance for approval		
A		
Debarment certification: verified that qualifying language (e.g., willingly, knowingly) was not used in certification and certifications from foreign applicants are co-signed by U.S. agent.		() Verified
B		
Patent		
• Information: Verify that patent information was submitted		
• Patent certification [505(b)(2) applications]: Verify type of certifications submitted		() Verified
CFR 314.50(i)(1)(i)(A)(3): The date on which the patent will expire. (Paragraph III certification)		21 CFR 314.50(i)(1)(i)(A) () I () II () III () IV
“Certifications for the listed drug.		21 CFR 314.50(i)(1) () (ii) () (iii)
As provided in Section 1.2 and 1.3 (Item 1, Volume 1, Page 15-16) of the original Zelapar™		

NDA, filed in March 2002, the patent certification for the drug was addressed by providing the patent expiration date (e.g., 15 July 2014)(Attachment 2). Although not explicitly stated as such, this statement is essentially a "Paragraph III Certification," as stipulated in §314.50(i)(1)(i)(a)(3)."	
Patent number(s): 5,648,093 exp: July 15, 2014 Drug Product (Composition)	
<ul style="list-style-type: none"> For paragraph IV certification, verify that the applicant notified the patent holder(s) of their certification that the patent(s) is invalid, unenforceable, or will not be infringed (certification of notification and documentation of receipt of notice). 	() Verified
C Exclusivity Summary (approvals only)	
D Administrative Reviews (Project Manager, ADRA) (indicate date of each review)	9/7/05 → Appendix B
General Information	
E Actions	
<ul style="list-style-type: none"> Proposed action 	() AP () TA (X) AE () NA
<ul style="list-style-type: none"> Previous actions (specify type and date for each action taken) 	AE - 2/7/03
<ul style="list-style-type: none"> Status of advertising (approvals only) 	() Materials requested in AP letter () Reviewed for Subpart H
F Public communications	
<ul style="list-style-type: none"> Press Office notified of action (approval only) 	() Yes (X) Not applicable
<ul style="list-style-type: none"> Indicate what types (if any) of information dissemination are anticipated 	() None () Press Release () Talk Paper () Dear Health Care Professional Letter
G Labeling (package insert, patient package insert (if applicable), Med Guide (if applicable))	
<ul style="list-style-type: none"> Division's proposed labeling (only if generated after latest applicant submission of labeling) 	
<ul style="list-style-type: none"> Most recent applicant-proposed labeling 	
<ul style="list-style-type: none"> Original applicant-proposed labeling 	
<ul style="list-style-type: none"> Labeling reviews (including DDMAC, Office of Drug Safety trade name review, nomenclature reviews) and minutes of labeling meetings (indicate dates of reviews and meetings) 	DDMAC 9/1/05 DME7S 9/14/05, 7/5/02
<ul style="list-style-type: none"> Other relevant labeling (e.g., most recent 3 in class, class labeling) 	
H Labels (immediate container & carton labels)	
<ul style="list-style-type: none"> Division proposed (only if generated after latest applicant submission) 	
<ul style="list-style-type: none"> Applicant proposed 	
<ul style="list-style-type: none"> Reviews 	
I Post-marketing commitments	
<ul style="list-style-type: none"> Agency request for post-marketing commitments 	
<ul style="list-style-type: none"> Documentation of discussions and/or agreements relating to post-marketing commitments 	

J Outgoing correspondence (i.e., letters, E-mails, faxes)	
K Memoranda and Telecons	
L Minutes of Meetings	
• EOP2 meeting (indicate date)	1-11-99
• Pre-NDA meeting (indicate date)	11-7-01 & 1-30-01
• Pre-Approval Safety Conference (indicate date; approvals only)	
• Other – End of Review (all TAB K)	4-25-03
M Advisory Committee Meeting	N/A
N Federal Register Notices, DESI documents, NAS, NRC (if any are applicable)	N/A
Clinical and Summary Information	
O Summary Reviews (e.g., Office Director, Division Director, Medical Team Leader) (indicate date for each review)	2/7/03
P Clinical review(s) (indicate date for each review)	1-10-03

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On Original

VOLUME 2

Q Microbiology (efficacy) review(s) (indicate date for each review)	12-10-02
R Safety Update review(s) (indicate date or location if incorporated in another review)	1-10-03
S Pediatric Page(separate page for each indication addressing status of all age groups)	
T Statistical review(s) (indicate date for each review)	
U Biopharmaceutical review(s) (indicate date for each review)	5-20-02, 12-18-02 9-21-05
❖ Controlled Substance Staff review(s) and recommendation for scheduling (indicate date for each review)	N/A
V Clinical Inspection Review Summary (DSI)	
• Clinical studies	
• Bioequivalence studies	
CMC Information	
W CMC review(s) (indicate date for each review)	
Environmental Assessment	
• Categorical Exclusion (indicate review date)	
• Review & FONSI (indicate date of review)	
• Review & Environmental Impact Statement (indicate date of each review)	
❖ Micro (validation of sterilization & product sterility) review(s) (indicate date for each review)	12-10-02
❖ Facilities inspection (provide EER report)	Date completed: () Acceptable () Withhold recommendation
❖ Methods validation	() Completed () Requested () Not yet requested
Nonclinical Pharm/Tox Information	
XYZ ❖ Pharm/tox review(s), including referenced IND reviews (indicate date for each review)	
❖ Nonclinical inspection review summary	
❖ Statistical review(s) of carcinogenicity studies (indicate date for each review)	
❖ CAC/ECAC report	

MEMORANDUM

DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION
CENTER FOR DRUG EVALUATION AND RESEARCH

DATE: June 14, 2006

TO: NDA 21-479

FROM: David J. Claffey, Ph.D.
Review Chemist, ONDQA/DPA-1/Branch 1

THROUGH:

SUBJECT: **Overall Compliance and CMC Recommendations:**
NDA 21-479 Zelapar (selegiline HCl) Orally Disintegrating
Tablets

The CDER Office of Compliance (OC) issued an overall 'Acceptable' recommendation for NDA 21-479 on June 14, 2006. A copy of the establishment evaluation report is attached. My review for this NDA, dated June 14, 2006, recommends approval of the application, pending an acceptable OC recommendation. Based on my review, and the Compliance recommendation, the Office of New Drug Quality Assessment recommends approval of NDA 21-479.

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On Original

8 Page(s) Withheld

Trade Secret / Confidential (b4)

Draft Labeling (b4)

Draft Labeling (b5)

Deliberative Process (b5)

*Withheld Track Number: Administrative-*_____

**This is a representation of an electronic record that was signed electronically and
this page is the manifestation of the electronic signature.**

/s/

David Claffey
6/14/2006 02:53:58 PM
CHEMIST

Appears This Way
On Original

Wheelous, Teresa A

From: Feeney III, John J
Int: Friday, June 09, 2006 9:13 AM
To: 'Art Rosenthal'
Cc: Wheelous, Teresa A; 'Hiteshi, Anil'
Subject: FW: Request for WORD version of Labeling

Art and Anil,

Per our phone call yesterday, the email below implies again that the new document was typed anew within the last few days. That is NOT what I heard Anil say yesterday. I think yesterday he said that he took the document typed months ago and removed the table format (that put boxes around the text). This still needs to be clarified in writing.

Thanks,
John

From: Hiteshi, Anil [mailto:ahiteshi@valeant.com]
Sent: Thursday, June 08, 2006 3:22 PM
To: Feeney III, John J; Wheelous, Teresa A
Subject: RE: Request for WORD version of Labeling

The document that we sent yesterday was typed in WORD from the FDA Approvable Letter.

Our Administrative Assistant typed it in MS WORD yesterday and is almost a ditto copy of what was in FDA letter.

Regards,

Anil

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

From: Feeney III, John J [mailto:john.feeneyiii@fda.hhs.gov]
Sent: Thursday, June 08, 2006 5:35 AM
To: Hiteshi, Anil
Subject: RE: Request for WORD version of Labeling

What we are trying to do is a comparison of what is in the Approvable Letter and, specifically, what you sent Teresa when she asked you for a WORD version of labeling. Depending on exactly how you created this attached document will determine whether it helps in that exercise. Please let Teresa and me know.

Thanks,

John

From: Hiteshi, Anil [mailto:ahiteshi@valeant.com]
Sent: Wednesday, June 07, 2006 8:51 PM
To: Wheelous, Teresa A
Cc: Rosenthal, Art L.; Kapcala, Leonard P; Feeney III, John J
Subject: RE: Request for WORD version of Labeling

Good Evening, Teresa -

Attached is the WORD file of the PI text that was provided to us with the September 30, 2005 Approvable Letter.

Please let me know if you need anything further.

Kind regards,

Anil.

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

From: Wheelous, Teresa A [mailto:teresa.wheelous@fda.hhs.gov]
Sent: Wednesday, June 07, 2006 11:24 AM
To: Hiteshi, Anil
Subject: Request for WORD version of Labeling

Anil,

We received the WORD version of labeling for the second approvable letter for NDA 21-479 Zydys Selegiline. We are having a problem because the labeling is presented in sections (as if it is a table). Please provide another WORD document of labeling without the table type formatting.

Thank you,

CDR Teresa Wheelous, R. Ph.
Sr. Regulatory Management Officer
FDA
Division of Neurology
10903 New Hampshire Avenue, Bldg. #22
Silver Spring, MD 20993-0002
(telephone) 301-796-1161
(fax) 301-796-9842

New email address: teresa.wheelous@fda.hhs.gov

Wheelous, Teresa A

From: Hiteshi, Anil [ahiteshi@valeant.com]
Sent: Thursday, June 08, 2006 3:17 PM
To: Feeney III, John J
Cc: Wheelous, Teresa A; Rosenthal, Art L.
Subject: RE: Len to Final.doc

Attachments: cvr ltr.pdf; Cover Pages.doc



cvr ltr.pdf (147 KB)



Cover Pages.doc (38 KB)

Good Morning Dr. Feeney -

Per your discussion with Art, attached is a pdf copy of our November 22, 2005 labeling request to the Agency to allow us to use the current blister and sachet for the first campaign.

This request, as well as the current and proposed label (blister, sachet, and carton), was also submitted in our December 13, 2005 Complete Response to the FDA September 30, 2005 Approvable Letter in Item 20, Section 4 - Revised Packaging and Labeling section. The cover sheet of Section 4 is also attached for your convenience.

Please let us know if you have any further comments or if you would like us to email the labels.

Kind regards,

Anil.

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

From: Feeney III, John J [<mailto:john.feeneyiii@fda.hhs.gov>]
Sent: Wednesday, June 07, 2006 3:19 PM
To: Hiteshi, Anil
Cc: Wheelous, Teresa A
Subject: Len to Final.doc

Good afternoon, The attached label represents the review team's proposal. The base document is what was sent with the Approvable Letter. Let us know if you have questions.

John Feeney
Neurology Team Leader <<Len to Final.doc>>

Wheelous, Teresa A

From: Hiteshi, Anil [ahiteshi@valeant.com]
Sent: Wednesday, June 07, 2006 8:56 PM
To: Kapcala, Leonard P
Cc: Rosenthal, Art L.; Hauptmann, Nils; Wheelous, Teresa A
Subject: RE: Countries ZS approved

Dear Dr. Kapcala -

We have double-checked with our resources and confirmed that the ROW approvals are no different than the information we provided in our December 13, 2005 Complete Response, Section 5, pages 5-10, 5-39, and 5-40. Zydys selegiline is approved in the following nine countries:

United Kingdom, Portugal, Italy, Austria, Denmark, France, Sweden, Germany, and Philippines.

Additionally, we were not able to obtain the approved SPC for the Philippines as we were not able to confirm if the product is still marketed in that country. However, if you would like we could try to obtain the SPC for the Philippines and forward the English translation to your attention when it becomes available.

Thank you.

Kind regards,

Anil.

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

-----Original Message-----

From: Kapcala, Leonard P [<mailto:leonard.kapcala@fda.hhs.gov>]
Sent: Monday, June 05, 2006 10:48 AM
To: Hiteshi, Anil
Cc: Kapcala, Leonard P
Subject: Countries ZS approved

Hi Anil,

Would you please tell me the number of countries and names of the countries in which Zydys selegiline is approved for treatment of advanced Parkinson's Disease patients?

Thanx.

Best regards,

Len

301-796-1098

-----Original Message-----

From: Hiteshi, Anil [<mailto:ahiteshi@valeant.com>]

Sent: Tuesday, May 23, 2006 6:58 PM

To: Kapcala, Leonard P

Cc: Wheelous, Teresa A; Rosenthal, Art L.; Hauptmann, Nils

Subject: RE: Questions about some data analyses from ZS development program

Dear Dr. Kapcala -

Attached, is an Excel file with the additional analyses you requested of the age range for the Parkinson's Disease patients who participated in all of the efficacy trials in the Zelapar development program.

In regards to your statement, we confirm that all patients who participated in the Zelapar development program had Parkinson's Disease and received adjunctive treatment.

As requested by you, we will also submit our response via a formal submission to the NDA.

Thank you.

Kind regards,

Anil.

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

-----Original Message-----

From: Kapcala, Leonard P [<mailto:leonard.kapcala@fda.hhs.gov>]

Sent: Tuesday, May 16, 2006 8:21 AM

To: Hiteshi, Anil

Cc: Kapcala, Leonard P

Subject: Questions about some data analyses from ZS development program

Hi Anil,

Hope that all is well with you.

Would you please send me some analyses of the age range of patients in your development program as soon as possible? I don't think that these specific data are presently available.

What is the number/% of patients who, at enrollment, were :

< 45 years vs > or = 45 years

< 40 years vs > or = 40 years

< 50 years vs > or = 50 years

Please conduct and send these separate, breakdown analyses : 1) for all Parkinson's Disease patients in your development program; and 2) for all patients in your two randomized, double-blind, placebo-controlled, identical studies (? 25 and 26 as I recall).

I believe that all patient had "advanced" Parkinson's Disease and received adjunctive treatment. Is that correct?

Would you please confirm that you received this?

Would you please give me a target date when you expect to be able to provide these response? I would think that this could be done in a relatively short period (e.g. within a few days).

When these data are ready, would you please send them to me by e-mail and also submit these data responses formally to the NDA?

Please contact me if any questions.

Thanx.

Best regards,

Len

_____ (today)

b(6)

301-796-1098 (office)

_____ cell, last resort)

b(6)

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]

Sent: Thursday, August 04, 2005 8:58 PM

To: Kapcala, Leonard P

Cc: William Schary; Rory Turk

Subject: Tyramine & QTc Response

Dear Dr. Kapcala:

Attached are our responses to your questions from your July 6 and July 11, 2005 emails.

Hard copies of these files, as well as the cover letters and Form 356h, were FedEx'd to the Agency today.

Please let me know if you need anything further.

Thank you very much for your patience.

Anil.

(See attached file: zelapar QTc FDA Response.zip)

(See attached file: Response to Tyramine Challenge Questions.doc)

Anil K. Hiteshi, R.A.C.
Associate Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

Wheelous, Teresa A

From: Hiteshi, Anil [ahiteshi@valeant.com]
Sent: Wednesday, June 07, 2006 8:51 PM
To: Wheelous, Teresa A
Cc: Rosenthal, Art L.; Kapcala, Leonard P; Feeney III, John J
Subject: RE: Request for WORD version of Labeling

Attachments: Zelapar Word PI.doc



Zelapar Word
PI.doc (143 KB)

Good Evening, Teresa -

Attached is the WORD file of the PI text that was provided to us with the September 30, 2005 Approvable Letter.

Please let me know if you need anything further.

Kind regards,

Anil.

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
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From: Wheelous, Teresa A [mailto:teresa.wheelous@fda.hhs.gov]
Sent: Wednesday, June 07, 2006 11:24 AM
To: Hiteshi, Anil
Subject: Request for WORD version of Labeling

Anil,

We received the WORD version of labeling for the second approvable letter for NDA 21-479 Zydis Selegiline. We are having a problem because the labeling is presented in sections (as if it is a table). Please provide another WORD document of labeling without the table type formatting.

Thank you,

CDR Teresa Wheelous, R. Ph.
Sr. Regulatory Management Officer
FDA
Division of Neurology
10903 New Hampshire Avenue, Bldg. #22
Silver Spring, MD 20993-0002
(telephone) 301-796-1161
(fax) 301-796-9842
New email address: teresa.wheelous@fda.hhs.gov

Appears This Way
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Wheelous, Teresa A

From: Feeney III, John J
Sent: Wednesday, June 07, 2006 6:19 PM
To: 'ahiteshi@valeant.com'
Cc: Wheelous, Teresa A
Subject: Len to Final.doc

Attachments: Len to Final.doc

Good afternoon, The attached label represents the review team's proposal. The base document is what was sent with the Approvable Letter. Let us know if you have questions.
John Feeney



Len to Final.doc
(285 KB)

Neurology Team Leader

Wheelous, Teresa A

From: Feeney III, John J
Sent: Wednesday, June 07, 2006 5:37 PM
To: Feeney III, John J; Kapcala, Leonard P; Katz, Russell G
Cc: Wheelous, Teresa A
Subject: Len to Final.doc

Attachments: Len to Final.doc



Len to Final.doc
(285 KB)

Here's the label that I'm sending to the sponsor Wed PM for their comment.

Wheelous, Teresa A

From: Hiteshi, Anil [ahiteshi@valeant.com]
Sent: Friday, June 02, 2006 6:19 PM
To: Kapcala, Leonard P
Cc: Rosenthal, Art L.; Hauptmann, Nils; Wheelous, Teresa A
Subject: RE: Tyramine & QTc study PK data

Hello Dr. Kapcala -

You are correct. PK sampling was ONLY collected at steady state on day 10th dosing in these two studies RNA-ZEL-B21-102 (tyramine pressure) and RNA600301-101 (QTc).

Thank you. Have a great weekend.

Best regards,

Anil.

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

-----Original Message-----

From: Kapcala, Leonard P [mailto:leonard.kapcala@fda.hhs.gov]
Sent: Friday, June 02, 2006 10:23 AM
To: Hiteshi, Anil
Subject: RE: Tyramine & QTc study PK data

Hi Anil,

I don't have access to the data at hand no. I'm pretty sure that in the last tyramine study and in the QTc study that PK sampling was ONLY collected at steady state around day 10-11. If I am wrong and PK data were also collected with initial dosing on day 1, would you please forward me a summary of the mean Cmax and mean AUC data for day 1 vs day 11 for all the Zydis selegiline doses from both studies?

Thanx.

Have a good weekend!

Best regards,

Len

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]
Sent: Thursday, August 04, 2005 8:58 PM
To: Kapcala, Leonard P
Cc: William Schary; Rory Turk
Subject: Tyramine & QTc study PK data

Dear Dr. Kapcala:

Attached are our responses to your questions from your July 6 and July 11, 2005 emails.

Hard copies of these files, as well as the cover letters and Form 356h, were FedEx'd to the Agency today.

Please let me know if you need anything further.

Thank you very much for your patience.

Anil.

(See attached file: zelapar QTc FDA Response.zip)

(See attached file: Response to Tyramine Challenge Questions.doc)

Anil K. Hiteshi, R.A.C.
Associate Director, Regulatory Affairs
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Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

Wheelous, Teresa A

From: cderdocadmin@cder.fda.gov
Sent: Friday, June 02, 2006 4:12 PM
To: Wheelous, Teresa A; Kapcala, Leonard P; Katz, Russell G; Smith, Diane; Kim-Jung, Linda; Mahmud, Alina; Wisniewski, Linda
Subject: DFS Email - N 021479 N 000 AZ 29-Mar-2005 - Review
Attachments: 090014648065399f.drl; 090014648065399f.pdf



0900146480653 0900146480653
99f.drl (404 B) 99f.pdf (43 KB)

Document room close out the following assignments:

	Personnel Code	Sup-Concur	St
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N 021479 N 000 AZ 29-Mar-2005	Z77	02-Jun-2006	CM
N 021479 N 000 AL 13-Dec-2005	Z77	02-Jun-2006	CM

Document Type: Review
Submission Description: Proprietary Name Review
PM activity: PM activity required

Author(s)/Discipline(s)

1. Linda Wisniewski, DRUG SAFETY OFFICE REVIEWER

Signer(s)

1. Linda Wisniewski
02-Jun-2006
2. Denise Toyer
02-Jun-2006
3. Carol Holquist

02-Jun-2006

Wheelous, Teresa A

From: Hiteshi, Anil [ahiteshi@valeant.com]
Sent: Tuesday, May 23, 2006 6:58 PM
To: Kapcala, Leonard P
Cc: Wheelous, Teresa A; Rosenthal, Art L.; Hauptmann, Nils
Subject: RE: Questions about some data analyses from ZS development program

Attachments: ZelaparFDARequest_Age_May2006.xls



ZelaparFDARequ
t_Age_May2006.

Dear Dr. Kapcala -

Attached, is an Excel file with the additional analyses you requested of the age range for the Parkinson's Disease patients who participated in all of the efficacy trials in the Zelapar development program.

In regards to your statement, we confirm that all patients who participated in the Zelapar development program had Parkinson's Disease and received adjunctive treatment.

As requested by you, we will also submit our response via a formal submission to the NDA.

Thank you.

Kind regards,

Anil.

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ahiteshi@valeant.com

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From: Kapcala, Leonard P [mailto:leonard.kapcala@fda.hhs.gov]
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< 50 years vs > or = 50 years

Please conduct and send these separate, breakdown analyses : 1) for all Parkinson's Disease patients in your development program; and 2) for all patients in your two randomized, double-blind, placebo-controlled, identical studies (? 25 and 26 as I recall).

I believe that all patient had "advanced" Parkinson's Disease and received adjunctive treatment. Is that correct?

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Would you please give me a target date when you expect to be able to provide these response? I would think that this could be done in a relatively short period (e.g. within a few days).

When these data are ready, would you please send them to me by e-mail and also submit these data responses formally to the NDA?

Please contact me if any questions.

Thanx.

Best regards,

Len

b(6)

_____ (today)

301-796-1098 (office)

_____ (cell, last resort)

b(6)

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]

Sent: Thursday, August 04, 2005 8:58 PM

To: Kapcala, Leonard P

Cc: William Schary; Rory Turk
Subject: Tyramine & QTc Response

Dear Dr. Kapcala:

Attached are our responses to your questions from your July 6 and July 11, 2005 emails.

Hard copies of these files, as well as the cover letters and Form 356h, were FedEx'd to the Agency today.

Please let me know if you need anything further.

Thank you very much for your patience.

Anil.

(See attached file: zelapar QTc FDA Response.zip)

(See attached file: Response to Tyramine Challenge Questions.doc)

Anil K. Hiteshi, R.A.C.
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Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

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On Original**

Wheelous, Teresa A

From: Hiteshi, Anil [ahiteshi@valeant.com]
nt: Tuesday, May 23, 2006 5:04 PM
to: Wheelous, Teresa A; Kapcala, Leonard P
Cc: Rosenthal, Art L.
Subject: RE: WORD version of last approvable labeling

Attachments: FDA_9302005 Unannotated PI.doc



FDA_9302005
annotated PI.doc

Attached is a copy of the WORD version of the September 30, 2005 labeling (as provided by the Division) without revisions.

Please let us know if you need anything further.

Kind regards,

Anil.

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

-----Original Message-----

From: Wheelous, Teresa A [mailto:teresa.wheelous@fda.hhs.gov]
Sent: Tuesday, May 23, 2006 10:22 AM
To: Hiteshi, Anil
Subject: RE: WORD version of last approvable letter

Anil,

The letter date for the second approvable letter is 9/30/05.

Teresa

-----Original Message-----

From: Hiteshi, Anil [mailto:ahiteshi@valeant.com]
Sent: Tuesday, May 23, 2006 12:47 PM
To: Kapcala, Leonard P
Cc: Wheelous, Teresa A; Rosenthal, Art L.
Subject: RE: WORD version of last approvable letter

Good Morning Dr. Kapcala -

I am looking for that right now.

I'll definitely send you a copy as well.

Thank you.

Kind regards,

Anil..

Anil K. Hiteshi, RAC
Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

-----Original Message-----

From: Kapcala, Leonard P [mailto:leonard.kapcala@fda.hhs.gov]
Sent: Tuesday, May 23, 2006 9:39 AM
To: Hiteshi, Anil
Cc: Kapcala, Leonard P
Subject: WORD version of last approvable letter

Hi Anil,

I understand that Theresa requested a WORD version of last approvable letter. Would you please tell me when you expect to be able to submit this? When available, would you please send it by e-mail in addition to submitting it officially to the NDA.

Thanx.

Len

301-796-1098

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]
Sent: Thursday, August 04, 2005 8:58 PM
To: Kapcala, Leonard P
Cc: William Schary; Rory Turk
Subject: Tyramine & QTc Response

Dear Dr. Kapcala:

Attached are our responses to your questions from your July 6 and July

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2005 emails.

Hard copies of these files, as well as the cover letters and Form 356h,
were FedEx'd to the Agency today.

Please let me know if you need anything further.

Thank you very much for your patience.

Anil.

(See attached file: zelapar QTc FDA Response.zip)

(See attached file: Response to Tyramine Challenge Questions.doc)

Anil K. Hiteshi, R.A.C.
Associate Director, Regulatory Affairs
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Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

/Wheelous, Teresa A

From: cderdocadmin@cder.fda.gov
Sent: Tuesday, May 23, 2006 1:37 PM
To: Wheelous, Teresa A; Peat, Raquel
Subject: DFS Email - N 021479 N 000 AZ 29-Mar-2005 - Review

Attachments: 090014648064b8cd.drl; 090014648064b8cd.pdf



090014648064b 090014648064b
8cd.drl (404 B) 8cd.pdf (118 KB)

Document room close out the following assignments:

	Personnel Code	Sup-Concur	St
N 021479 N 000 AZ 29-Mar-2005	27S	23-May-2006	CM

Document Type: Review
Submission Description: Regulatory Review
PM activity: PM activity required

Author(s)/Discipline(s)

T. Teresa Wheelous, CSO

Signer(s)

-
1. Teresa Wheelous
23-May-2006
 2. Teresa Wheelous
23-May-2006

Wheelous, Teresa A

From: Peat, Raquel
Sent: Tuesday, May 23, 2006 1:20 PM
To: Wheelous, Teresa A
Cc: Nighswander, Robbin M; Colangelo, Kim M
Subject: CLEARED: 505(b)(2): NDA 21-479, selegiline HCL with a goal date of Jun 14, 2006

Hello Teresa:

You are cleared to act on this application (NDA 21-479) from IO/ORP and OCC provided that:

- Your revised regulatory filing review is entered in DFS.
- A reviewer should document in their review the reason why NDA 19-334 was withdrawn from the market.
- Follow-up that Valeant submits officially to this application the fax dated May 22, 2006.

By the way, you did a very good job. Happy Action!

Raquel

LT Raquel Peat, MS, MPH, USPHS

Regulatory Project Officer
FDA/CDER/OND, Immediate Office
301-796-0700 (OND IO main)
301-796-0517 (direct)
Fax: 301-796-9858

Address:

10903 New Hampshire Ave.

Bldg #22, Room 6469

Silver Spring, MD 20993

Email address has changed as of February 1, 2006: Raquel.Peat@fda.hhs.gov

Appears This Way
On Original

Wheelous, Teresa A

From: Wheelous, Teresa A
Sent: Friday, May 19, 2006 5:06 PM
To: 'Art Rosenthal'; 'Anil Hiteshi'
Cc: Wheelous, Teresa A
Subject: Zydys Selegiline 505b2 Info Request

Art and Anil,

Please answer the following questions:

There was a question in regards to the paragraph III patent certification, it seems that the applicant inadvertently submitted a paragraph III patent certification to the risperidone (NDA 21-444) patent 5,648,093 for which you did not reference. Is that correct? If so, was this intentional and did you rely on any information for NDA 21-444?

Secondly, from an email dated 9-28-05, the applicant indicated that they only referenced Eldepryl (NDAs 20-647 and 19-334) products and would submit a paragraph II certification to correct the error. What is the submission date for the corrected paragraph II certification?

CDR Teresa Wheelous, R. Ph.

Regulatory Management Officer
DA

Division of Neurology

10903 New Hampshire Avenue, Bldg. #22

Silver Spring, MD 20993-0002

(telephone) 301-796-1161

(fax) 301-796-9842

New email address: teresa.wheelous@fda.hhs.gov

Wheelous, Teresa A

From: cderdocadmin@cder.fda.gov
Sent: Tuesday, May 16, 2006 11:08 AM
To: Wheelous, Teresa A; Mehta, Mehul U; Uppoor, Ramana S; Kapcala, Leonard P; Lesko, Lawrence J; Huang, Shiew Mei; Sahajwalla, Chandrahas G; Malinowski, Henry J; Lazor, John A; Hunt, John P
Subject: DFS Email - N 021479 N 000 AL 13-Dec-2005 - Review
Attachments: 090014648064522c.drl; 090014648064522c.pdf



0900146480645 0900146480645
22c.drl (404 B) 22c.pdf (3 MB)

Document room close out the following assignments:

Personnel Code	Sup-Concur	St
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N 021479 N 000 AL 13-Dec-2005	D91	16-May-2006	CM
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Document Type: Review
Submission Description: complete response
PM activity: PM activity required

Author(s)/Discipline(s)

1. Veneeta Tandon, BIOPHARMACEUTICS

Signer(s)

- 1. Veneeta Tandon
15-May-2006
2. Ramana S. Uppoor
15-May-2006
3. Mehul Mehta
16-May-2006

Wheelous, Teresa A

From: Wheelous, Teresa A
Sent: Tuesday, February 07, 2006 8:14 AM
To: 'Anil Hiteshi'
Subject: Zelapar NDA 21-479 Clin Pharm Info Request 2/7/06

Anil,

The following is a clinical pharmacology info request for missing renal data:

Data from Study Z/SEL/008 has been used to demonstrate clearance and Cmax for Zydis doses 1.25 mg and 10 mg and Eldepryl 10 mg as given in Table 5-7 and Figures 1-3 of the response on pages 20-23 (Vol 1 of 4) of the submission. Individual subject data including subject demographics (i.e. age, gender, weight, height if available), serum creatinine, and estimated creatinine clearance (specify formula used) have not been submitted. However, these data were presumably used to generate these Tables and Figures. Individual subject creatinine data are not available from this study from the electronic submission of March 2002 as well. Please provide this information as soon as possible.

Thank you,

CDR Teresa Wheelous, R. Ph.
Sr. Regulatory Management Officer
FDA
Division of Neurology
10903 New Hampshire Avenue, Bldg. #22
Silver Spring, MD 20993-0002
(telephone) 301-796-2250

(fax) 301-796-9842

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]
Sent: Tuesday, January 31, 2006 9:02 PM
To: Wheelous, Teresa A
Cc: William Schary
Subject: Fw: Complete Response - December 13, 2005 Minor Amendment to
Zelapar NDA 21-479

Good Morning, Teresa -

Our Senior Management group at Valeant has informed us that, if at all possible, they would like to obtain FDA's input by the end of this week in order to make a decision regarding the disposition of the Zelapar packaging/labeling.

We were wondering if you had a chance to contact DMETS to obtain an answer to our packaging/labeling questions for Zelapar. If not, is there a person in DEMETS who we can contact directly?

Thank you for your help, Teresa.

Best regards,

Anil.

Anil K. Hiteshi, R.A.C.
Associate Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

----- Forwarded by Anil Hiteshi/Research/ICN on 01/31/2006 10:03 AM -----

Anil
Hiteshi/Research
/ICN

01/18/2006 11:50
AM

"Wheelous, Teresa A"
<WHEELLOUST@cder.fda.gov>

To

William Schary/Research/ICN

CC

Subject
RE: Complete Response - December 13,
2005 Minor Amendment to Zelapar NDA
21-479(Document link: Anil Hiteshi)

Thank you for the email, Teresa.

Attached is an electronic copy of the request that we sent to the Agency on November 22, 2005.

To view the labeling proofs that are discussed in this request, please see pages 4-1 to 4-23 of our December 13, 2005 complete response. For your convenience, we are including the labeling proofs for campaign 1 and campaign 2 with this email.

Anything that you can do to obtain an answer would be most appreciated since the Agency's decision will help us in the planning and scheduling of the campaign 1 and campaign 2 Zelapar batches.

Kind regards,

Anil.

(See attached file: cvr ltr.pdf) (See attached file: Section 4, pages 4-1 to 23 .pdf)

Anil K. Hiteshi, R.A.C.
Associate Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

"Wheelous,
Teresa A"
<WHEELOUST@cdcr.
fda.gov>

01/18/2006 05:04
AM

"Anil Hiteshi"
<ahiteshi@valeant.com>

To

cc

Subject
RE: Complete Response - December 13,
2005 Minor Amendment to Zela par NDA
21-479

Anil,

I will relay your request to DMETS in a consult containing copies of your referenced materials. DMETS does not retain previous submissions so please provide a copy of the combined documents that you would like for DMETS to consider. These documents may be sent to me via email.

Remember, that there's no mechanism to assure you that an answer will be available this far out, by the end of the month as requested, from the next goal date (6/06).

Regards,
CDR Teresa Wheelous, R. Ph.
Sr. Regulatory Management Officer
FDA
Division of Neurology
10903 New Hampshire Avenue, Bldg. #22
Silver Spring, MD 20993-0002
(telephone) 301-796-2250
(fax) 301-796-9842

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]
Sent: Tuesday, January 17, 2006 2:32 PM
To: Wheelous, Teresa A
Cc: William Schary
Subject: RE: Complete Response - December 13, 2005 Minor Amendment to Zelapar NDA 21-479

Dear Teresa,

Thank you for sending us the January 12, 2006 Class 2 resubmission letter.

Based upon your email, we assume that you have not heard from the Division of Medication Errors and Technical Support (DMETS) regarding our packaging question for the first campaign. Please contact DMETS to see when they will be able to provide a response to our question. For planning and scheduling purposes, we would appreciate if DMETS could respond to us by the end of this month. Thank you for your assistance in this matter.

Kind regards,

Anil.

Anil K. Hiteshi, R.A.C.

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"Wheelous,
Teresa A"
<WHEELOUST@cder.
fda.gov>

"Anil Hiteshi"
<ahiteshi@valeant.com>

To

01/17/2006 08:20
AM

cc

Subject
RE: Complete Response - December 13,
2005 Minor Amendment to NDA 21-479

Anil,

Attached is a copy of the Class 2 resubmission letter that has been mailed to Valeant.

CDR Teresa Wheelous, R. Ph.
Sr. Regulatory Management Officer
FDA
Division of Neurology
10903 New Hampshire Avenue, Bldg. #22
Silver Spring, MD 20993-0002
(telephone) 301-796-2250
(fax) 301-796-9842

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]

Sent: Monday, January 16, 2006 2:55 PM

To: Wheelous, Teresa A

Cc: William Schary

Subject: Complete Response - December 13, 2005 Minor Amendment to NDA 21-479

Dear Teresa:

On December 13, 2005, we submitted as a Minor Amendment to NDA 21-479 our complete response to the Agency's September 30, 2005 approvable letter for ZelaparTM (selegiline HCl) Orally Disintegrating Tablets and have the following inquiries concerning our submission:

Please confirm that our December 13, 2005 submission was accepted for filing and considered by the FDA to be a complete response.

Please let us know whether our December 13, 2005 complete response represents a Minor Amendment or a Major Amendment (i.e. a two-month review vs. a six-month review) as determined by the Agency.

As mentioned in our November 22, 2005 letter and our December 13, 2005 submission, we would like to confirm whether it will be acceptable for Valeant to use in the first packaging campaign the existing blister and sachet labeling submitted in the March 29, 2005 complete response with the revised carton labeling included in the December 13, 2005 submission.

Please let us know your responses to the above inquiries at your earliest convenience.

Thank you for your assistance.

Wishing you a best in 2006 and always.

Kind regards,

Anil.

Anil K. Hiteshi, R.A.C.
Associate Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

(See attached file: Class 2 complete response letter 121305.pdf)

Wheelous, Teresa A

From: Anil Hiteshi [ahiteshi@valeant.com]
Sent: Tuesday, January 31, 2006 9:02 PM
To: Wheelous, Teresa A
Cc: William Schary
Subject: Fw: Complete Response - December 13, 2005 Minor Amendment to Zelapar NDA 21-479

Follow Up Flag: Follow up
Flag Status: Red

Attachments: cvr ltr.pdf; Section 4, pages 4-1 to 4-23 .pdf



cvr ltr.pdf (147 KB)
Section 4, pages 4-1 to 4-23

Good Morning, Teresa -

Our Senior Management group at Valeant has informed us that, if at all possible, they would like to obtain FDA's input by the end of this week in order to make a decision regarding the disposition of the Zelapar packaging/labeling.

We were wondering if you had a chance to contact DMETS to obtain an answer to our packaging/labeling questions for Zelapar. If not, is there a person in DEMETS who we can contact directly?

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----- Forwarded by Anil Hiteshi/Research/ICN on 01/31/2006 10:03 AM -----

Anil
Hiteshi/Research
/ICN

01/18/2006 11:50
AM

"Wheelous, Teresa A"
<WHEELOUST@cderr.fda.gov>

To

cc

William Schary/Research/ICN

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RE: Complete Response - December 13,
2005 Minor Amendment to Zelapar NDA
21-479(Document link: Anil Hiteshi)

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Anil.

(See attached file: cvr ltr.pdf) (See attached file: Section 4, pages 4-1 to
4-23 .pdf)

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"Wheelous,
Teresa A"

<WHEELOUST@cdcr
fda.gov>

"Anil Hiteshi"
<ahiteshi@valeant.com>

01/18/2006 05:04
AM

To
cc

Subject

RE: Complete Response - December 13,
2005 Minor Amendment to Zela par NDA
21-479

Anil,

I will relay your request to DMETS in a consult containing copies of your referenced materials. DMETS does not retain previous submissions so please provide a copy of the combined documents that you would like for DMETS to consider. These documents may be sent to me via email.

Remember, that there's no mechanism to assure you that an answer will be available this far out, by the end of the month as requested, from the next goal date (6/06).

Regards,

CDR Teresa Wheelous, R. Ph.
Sr. Regulatory Management Officer
FDA

Division of Neurology
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-----Original Message-----

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Sent: Tuesday, January 17, 2006 2:32 PM
To: Wheelous, Teresa A
Cc: William Schary
Subject: RE: Complete Response - December 13, 2005 Minor Amendment to
Zelapar NDA 21-479

Dear Teresa,

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Based upon your email, we assume that you have not heard from the Division of Medication Errors and Technical Support (DMETS) regarding our packaging question for the first campaign. Please contact DMETS to see when they will

be able to provide a response to our question. For planning and scheduling purposes, we would appreciate if DMETS could respond to us by the end of this month. Thank you for your assistance in this matter.

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01/17/2006 08:20
AM

"Anil Hiteshi"
<ahiteshi@valeant.com>

To

cc

Subject
RE: Complete Response - December 13,
2005 Minor Amendment to NDA 21-479

Anil,

Attached is a copy of the Class 2 resubmission letter that has been mailed to Valeant.

CDR Teresa Wheelous, R. Ph.
Sr. Regulatory Management Officer
FDA
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Silver Spring, MD 20993-0002
(telephone) 301-796-2250
(fax) 301-796-2242

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]

Sent: Monday, January 16, 2006 2:55 PM
To: Wheelous, Teresa A
Cc: William Schary
Subject: Complete Response - December 13, 2005 Minor Amendment to NDA
21-479

Dear Teresa:

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Please confirm that our December 13, 2005 submission was accepted for filing and considered by the FDA to be a complete response.

Please let us know whether our December 13, 2005 complete response represents a Minor Amendment or a Major Amendment (i.e. a two-month review vs. a six-month review) as determined by the Agency.

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Please let us know your responses to the above inquiries at your earliest convenience.

Thank you for your assistance.

Wishing you a best in 2006 and always.

Kind regards,

Anil.

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Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

(See attached file: Class 2 complete response letter 121305.pdf)

Appears This Way
On Original

Wheelous, Teresa A

From: Peat, Raquel
Sent: Tuesday, May 23, 2006 1:20 PM
To: Wheelous, Teresa A
Cc: Nighswander, Robbin M; Colangelo, Kim M
Subject: CLEARED: 505(b)(2): NDA 21-479, selegiline HCL with a goal date of Jun 14, 2006

Hello Teresa:

You are cleared to act on this application (NDA 21-479) from IO/ORP and OCC provided that:

- Your revised regulatory filing review is entered in DFS.
- A reviewer should document in their review the reason why NDA 19-334 was withdrawn from the market.
- Follow-up that Valeant submits officially to this application the fax dated May 22, 2006.

By the way, you did a very good job. Happy Action!

Raquel

LT Raquel Peat, MS, MPH, USPHS

Regulatory Project Officer

FDA/CDER/OND, Immediate Office

301-796-0700 (OND IO main)

301-796-0517 (direct)

Fax: 301-796-9858

Address:

10903 New Hampshire Ave.

Bldg #22, Room 6469

Silver Spring, MD 20993

Email address has changed as of February 1, 2006: Raquel.Peat@fda.hhs.gov

Appears This Way
On Original

product described in the application. Highlight the differences between the proposed and approved labeling. If you need assistance in determining if the applicant is claiming a new indication for a use, please contact the user fee staff.

- Is there any 5-year or 3-year exclusivity on this active moiety in an approved (b)(1) or (b)(2) application? YES NO
If yes, explain:
- Does another drug have orphan drug exclusivity for the same indication? YES NO
- If yes, is the drug considered to be the same drug according to the orphan drug definition of sameness [21 CFR 316.3(b)(13)]? YES NO
If yes, consult the Director, Division of Regulatory Policy II, Office of Regulatory Policy (HFD-007).
- Is the application affected by the Application Integrity Policy (AIP)? YES NO
If yes, explain:
- If yes, has OC/DMPQ been notified of the submission? YES NO
- Does the submission contain an accurate comprehensive index? YES NO
- Was form 356h included with an authorized signature? YES NO
If foreign applicant, both the applicant and the U.S. agent must sign.
- Submission complete as required under 21 CFR 314.50? YES NO
If no, explain:
- If an electronic NDA, does it follow the Guidance? N/A YES NO
If an electronic NDA, all forms and certifications must be in paper and require a signature.
Which parts of the application were submitted in electronic format?

Additional comments:

- If an electronic NDA in Common Technical Document format, does it follow the CTD guidance? N/A YES NO
- Is it an electronic CTD (eCTD)? N/A YES NO
If an electronic CTD, all forms and certifications must either be in paper and signed or be electronically signed.

Additional comments:

- Patent information submitted on form FDA 3542a? YES NO
- Exclusivity requested? YES, 3 Years NO
NOTE: An applicant can receive exclusivity without requesting it; therefore, requesting exclusivity is not required.
- Correctly worded Debarment Certification included with authorized signature? YES NO
If foreign applicant, both the applicant and the U.S. Agent must sign the certification.

NOTE: Debarment Certification should use wording in FD&C Act section 306(k)(1) i.e.,
 “[Name of applicant] hereby certifies that it did not and will not use in any capacity the services of any person debarred under section 306 of the Federal Food, Drug, and Cosmetic Act in connection with this application.” Applicant may not use wording such as “To the best of my knowledge”

- Financial Disclosure forms included with authorized signature? YES NO
(Forms 3454 and 3455 must be included and must be signed by the APPLICANT, not an agent.)
NOTE: Financial disclosure is required for bioequivalence studies that are the basis for approval.
- Field Copy Certification (that it is a true copy of the CMC technical section)? Y NO
- PDUFA and Action Goal dates correct in COMIS? YES NO
 If not, have the document room staff correct them immediately. These are the dates EES uses for calculating inspection dates.
- Drug name and applicant name correct in COMIS? If not, have the Document Room make the corrections. Ask the Doc Rm to add the established name to COMIS for the supporting IND if it is not already entered.
- List referenced IND numbers: 47,005
- End-of-Phase 2 Meeting(s)? Date(s) 1/11/99 NO
 If yes, distribute minutes before filing meeting.
- Pre-NDA Meeting(s)? Date(s) 1/30/01 & 11/7/01 NO
 If yes, distribute minutes before filing meeting.

Project Management

- Was electronic “Content of Labeling” submitted? YES NO
 If no, request in 74-day letter.
- All labeling (PI, PPI, MedGuide, carton and immediate container labels) consulted to DDMAC? YES NO
- Risk Management Plan consulted to ODS/IO? N/A YES NO
- Trade name (plus PI and all labels and labeling) consulted to ODS/DMETS? Y NO
- MedGuide and/or PPI (plus PI) consulted to ODS/DSRCS? N/A YES NO
- If a drug with abuse potential, was an Abuse Liability Assessment, including a proposal for scheduling, submitted? N/A YES NO

If Rx-to-OTC Switch application:

- OTC label comprehension studies, all OTC labeling, and current approved PI consulted to ODS/DSRCS? N/A YES NO
- Has DOTCDP been notified of the OTC switch application? YES NO

Clinical

- If a controlled substance, has a consult been sent to the Controlled Substance Staff?
YES NO

Chemistry

- Did applicant request categorical exclusion for environmental assessment? YES NO
If no, did applicant submit a complete environmental assessment? YES NO
If EA submitted, consulted to Florian Zielinski (HFD-357)? YES NO
- Establishment Evaluation Request (EER) submitted to DMPQ? YES NO
- If a parenteral product, consulted to Microbiology Team (HFD-805)? YES NO

Appears This Way
On Original

ATTACHMENT

MEMO OF FILING MEETING

DATE: January 9, 2006

BACKGROUND: The original new drug application (NDA) dated March 29, 2002, was received April 8, 2002. An approvable letter issued on Feb. 7, 2003, and the March 29, 2005 submission constituted a complete response to our February 7, 2003 action letter. September 15, 2005 another approvable letter issued, and the sponsor responded in a December 14, 2005 submission.

The active ingredient, selegiline, is already approved under the reference listed name of Eldepryl Tablets and Eldepryl Capsules.

(Provide a brief background of the drug, e.g., it is already approved and this NDA is for an extended-release formulation; whether another Division is involved; foreign marketing history; etc.)

ATTENDEES: Feeney III, John J; Kapcala, Leonard P; Tandon, Vaneeta; Uppoor, Ramana S; Freed, Lois M; Claffey, David; Heimann, Martha R; Katz, Russell G; Jin, Kun;

ASSIGNED REVIEWERS (including those not present at filing meeting) :

<u>Discipline</u>	<u>Reviewer</u>
Medical:	Kapcala, Leonard
Secondary Medical:	
Statistical:	Kong, Fan-hui / Kun
Pharmacology:	Roney / Freed, Lois
Statistical Pharmacology:	
Chemistry:	Zarifa, M / Claffey / Heimann.
Environmental Assessment (if needed):	
Biopharmaceutical:	Tandon, Vaneeta
Microbiology, sterility:	Riley, Bryan
Microbiology, clinical (for antimicrobial products only):	
DSI:	
Regulatory Project Management:	Wheelous, Teresa
Other Consults:	

Per reviewers, are all parts in English or English translation? YES NO
If no, explain:

CLINICAL FILE REFUSE TO FILE

• Clinical site inspection needed? YES NO

• Advisory Committee Meeting needed? YES, date if known _____ NO

• If the application is affected by the AIP, has the division made a recommendation regarding whether or not an exception to the AIP should be granted to permit review based on medical necessity or public health significance?
N/A YES NO

CLINICAL MICROBIOLOGY N/A FILE REFUSE TO FILE

STATISTICS	N/A <input type="checkbox"/>	FILE <input checked="" type="checkbox"/>	REFUSE TO FILE <input type="checkbox"/>
BIOPHARMACEUTICS		FILE <input checked="" type="checkbox"/>	REFUSE TO FILE <input type="checkbox"/>
	• Biopharm. inspection needed?		YES <input type="checkbox"/> NO <input type="checkbox"/>
PHARMACOLOGY	N/A <input type="checkbox"/>	FILE <input checked="" type="checkbox"/>	REFUSE TO FILE <input type="checkbox"/>
	• GLP inspection needed?		YES <input type="checkbox"/> NO <input type="checkbox"/>
CHEMISTRY		FILE <input type="checkbox"/>	REFUSE TO FILE <input type="checkbox"/>
	• Establishment(s) ready for inspection?		YES <input type="checkbox"/> NO <input type="checkbox"/>
	• Microbiology		YES <input type="checkbox"/> NO <input type="checkbox"/>

ELECTRONIC SUBMISSION:
Any comments:

REGULATORY CONCLUSIONS/DEFICIENCIES:
(Refer to 21 CFR 314.101(d) for filing requirements.)

- The application is unsuitable for filing. Explain why:
- The application, on its face, appears to be well-organized and indexed. The application appears to be suitable for filing.
 - No filing issues have been identified.
 - Filing issues to be communicated by Day 74. List (optional):

ACTION ITEMS:

1. If RTF, notify everybody who already received a consult request of RTF action. Cancel the EER.
2. If filed and the application is under the AIP, prepare a letter either granting (for signature by Center Director) or denying (for signature by ODE Director) an exception for review.
3. Convey document filing issues/no filing issues to applicant by Day 74.

Regulatory Project Manager, HFD-

Appendix A to NDA Regulatory Filing Review

An application is likely to be a 505(b)(2) application if:

- (3) it relies on literature to meet any of the approval requirements (unless the applicant has a written right of reference to the underlying data)
- (4) it relies on the Agency's previous approval of another sponsor's drug product (which may be evidenced by reference to publicly available FDA reviews, or labeling of another drug sponsor's drug product) to meet any of the approval requirements (unless the application includes a written right of reference to data in the other sponsor's NDA)
- (5) it relies on what is "generally known" or "scientifically accepted" about a class of products to support the safety or effectiveness of the particular drug for which the applicant is seeking approval. (Note, however, that this does not mean *any* reference to general information or knowledge (e.g., about disease etiology, support for particular endpoints, methods of analysis) causes the application to be a 505(b)(2) application.)
- (6) it seeks approval for a change from a product described in an OTC monograph and relies on the monograph to establish the safety or effectiveness of one or more aspects of the drug product for which approval is sought (see 21 CFR 330.11).

Products that may be likely to be described in a 505(b)(2) application include combination drug products (e.g., heart drug and diuretic (hydrochlorothiazide) combinations), OTC monograph deviations, new dosage forms, new indications, and new salts.

If you have questions about whether an application is a 505(b)(1) or 505(b)(2) application, please consult with the Director, Division of Regulatory Policy II, Office of Regulatory Policy (HFD-007).

Appears This Way
On Original

**Appendix B to NDA Regulatory Filing Review
Questions for 505(b)(2) Applications**

1. Does the application reference a listed drug (approved drug)? YES NO

If "No," skip to question 3.

2. Name of listed drug(s) referenced by the applicant (if any) and NDA/ANDA #(s): NDA 19-334 Eldepryl Tablets & 20-647 Eldepryl Capsules

3. The purpose of this and the questions below (questions 3 to 5) is to determine if there is an approved drug product that is equivalent or very similar to the product proposed for approval and that should be referenced as a listed drug in the pending application.

- (a) Is there a pharmaceutical equivalent(s) to the product proposed in the 505(b)(2) application that is already approved?

YES NO

(Pharmaceutical equivalents are drug products in identical dosage forms that: (1) contain identical amounts of the identical active drug ingredient, i.e., the same salt or ester of the same therapeutic moiety, or, in the case of modified release dosage forms that require a reservoir or overage or such forms as prefilled syringes where residual volume may vary, that deliver identical amounts of the active drug ingredient over the identical dosing period; (2) do not necessarily contain the same inactive ingredients; and (3) meet the identical compendial or other applicable standard of identity, strength, quality, and purity, including potency and, where applicable, content uniformity, disintegration times, and/or dissolution rates. (21 CFR 320.1(c))

If "No," skip to question 4. Otherwise, answer part (b).

- (b) Is the approved pharmaceutical equivalent(s) cited as the listed drug(s)? YES NO
(The approved pharmaceutical equivalent(s) should be cited as the listed drug(s).)

If "Yes," skip to question 6. Otherwise, answer part (c).

- (c) Have you conferred with the Director, Division of Regulatory Policy II, Office of Regulatory Policy (ORP) (HFD-007)? YES NO

If "No," please contact the Director, Division of Regulatory Policy II, ORP. Proceed to question 6.

4. (a) Is there a pharmaceutical alternative(s) already approved? YES NO

(Pharmaceutical alternatives are drug products that contain the identical therapeutic moiety, or its precursor, but not necessarily in the same amount or dosage form or as the same salt or ester. Each such drug product individually meets either the identical or its own respective compendial or other applicable standard of identity, strength, quality, and purity, including potency and, where applicable, content uniformity, disintegration times and/or dissolution rates. (21 CFR 320.1(d)) Different dosage forms and strengths within a product line by a single manufacturer are thus pharmaceutical alternatives, as are extended-release products when compared with immediate- or standard-release formulations of the same active ingredient.)

If "No," skip to question 5. Otherwise, answer part (b).

- (b) Is the approved pharmaceutical alternative(s) cited as the listed drug(s)? YES NO
(The approved pharmaceutical alternative(s) should be cited as the listed drug(s).)

NOTE: *If there is more than one pharmaceutical alternative approved, consult the Director, Division of Regulatory Policy II, Office of Regulatory Policy (ORP) (HFD-007) to determine if the appropriate pharmaceutical alternatives are referenced.*

If "Yes," skip to question 6. Otherwise, answer part (c).

- (c) Have you conferred with the Director, Division of Regulatory Policy II, ORP? YES NO

If "No," please contact the Director, Division of Regulatory Policy II, ORP. Proceed to question 6.

5. (a) Is there an approved drug product that does not meet the definition of "pharmaceutical equivalent" or "pharmaceutical alternative," as provided in questions 3(a) and 4(a), above, but that is otherwise very similar to the proposed product? YES NO

If "No," skip to question 6.

If "Yes," please describe how the approved drug product is similar to the proposed one and answer part (b) of this question. Please also contact the Director, Division of Regulatory Policy II, Office of Regulatory Policy (HFD-007), to further discuss.

- (b) Is the approved drug product cited as the listed drug? YES NO
6. Describe the change from the listed drug(s) provided for in this (b)(2) application (for example, "This application provides for a new indication, otitis media" or "This application provides for a change in dosage form, from capsules to solution"). This application provides for a change in dosage form. This formulation is a rapidly disintegrating oral tablet, and the referenced listed products are immediate release oral formulations.
7. Is the application for a duplicate of a listed drug and eligible for approval under section 505(j) as an ANDA? (Normally, FDA will refuse-to-file such NDAs (see 21 CFR 314.101(d)(9)).) YES NO
8. Is the extent to which the active ingredient(s) is absorbed or otherwise made available to the site of action less than that of the reference listed drug (RLD)? (See 314.54(b)(1)). If yes, the application should be refused for filing under 21 CFR 314.101(d)(9)). YES NO
9. Is the rate at which the product's active ingredient(s) is absorbed or otherwise made available to the site of action unintentionally less than that of the RLD (see 21 CFR 314.54(b)(2))? If yes, the application should be refused for filing under 21 CFR 314.101(d)(9). YES NO
10. Are there certifications for each of the patents listed for the listed drug(s)? YES NO
11. Which of the following patent certifications does the application contain? (Check all that apply and identify the patents to which each type of certification was made, as appropriate.)

- 21 CFR 314.50(i)(1)(i)(A)(1): The patent information has not been submitted to FDA. (Paragraph I certification)
Patent number(s):

- 21 CFR 314.50(i)(1)(i)(A)(2): The patent has expired. (Paragraph II certification)
Patent number(s):
- 21 CFR 314.50(i)(1)(i)(A)(3): The date on which the patent will expire. (Paragraph III certification)
Patent number(s):
- 21 CFR 314.50(i)(1)(i)(A)(4): The patent is invalid, unenforceable, or will not be infringed by the manufacture, use, or sale of the drug product for which the application is submitted. (Paragraph IV certification)
Patent number(s):

NOTE: IF FILED, and if the applicant made a "Paragraph IV" certification [21 CFR 314.50(i)(1)(i)(A)(4)], the applicant must **subsequently** submit a signed certification stating that the NDA holder and patent owner(s) were notified the NDA was filed [21 CFR 314.52(b)]. The applicant must also submit documentation showing that the NDA holder and patent owner(s) received the notification [21 CFR 314.52(e)].

- 21 CFR 314.50(i)(1)(ii): No relevant patents.
- 21 CFR 314.50(i)(1)(iii): The patent on the listed drug is a method of use patent and the labeling for the drug product for which the applicant is seeking approval does not include any indications that are covered by the use patent as described in the corresponding use code in the Orange Book. Applicant must provide a statement that the method of use patent does not claim any of the proposed indications. (Section viii statement)
Patent number(s):
- 21 CFR 314.50(i)(3): Statement that applicant has a licensing agreement with the patent owner (must also submit certification under 21 CFR 314.50(i)(1)(i)(A)(4) above).
Patent number(s):
- Written statement from patent owner that it consents to an immediate effective date upon approval of the application.
Patent number(s):

12. Did the applicant:

- Identify which parts of the application rely on information (e.g. literature, prior approval of another sponsor's application) that the applicant does not own or to which the applicant does not have a right of reference?
YES NO
- Submit a statement as to whether the listed drug(s) identified has received a period of marketing exclusivity?
YES NO
- Submit a bioavailability/bioequivalence (BA/BE) study comparing the proposed product to the listed drug?
N/A YES NO
- Certify that it is seeking approval only for a new indication and not for the indications approved for the listed drug if the listed drug has patent protection for the approved indications and the applicant is requesting only the new indication (21 CFR 314.54(a)(1)(iv).?)

N/A YES NO

13. If the (b)(2) applicant is requesting 3-year exclusivity, did the applicant submit the following information required by 21 CFR 314.50(j)(4):

- Certification that at least one of the investigations included meets the definition of "new clinical investigation" as set forth at 314.108(a).

YES NO

- A list of all published studies or publicly available reports that are relevant to the conditions for which the applicant is seeking approval.

YES NO

- EITHER

The number of the applicant's IND under which the studies essential to approval were conducted.

IND# 47,005 NO

OR

A certification that the NDA sponsor provided substantial support for the clinical investigation(s) essential to approval if it was not the sponsor of the IND under which those clinical studies were conducted?

YES NO

3. Has the Associate Director for Regulatory Affairs, OND, been notified of the existence of the (b)(2) application?

YES NO

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this page is the manifestation of the electronic signature.**

/s/

Teresa Wheelous
5/23/2006 01:31:45 PM
CSO

Teresa Wheelous
5/23/2006 01:36:19 PM
CSO

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Wheelous, Teresa A

From: Wheelous, Teresa A
nt: Friday, May 19, 2006 5:06 PM
ro: 'Art Rosenthal'; 'Anil Hiteshi'
Cc: Wheelous, Teresa A
Subject: Zydys Selegiline 505b2 Info Request

Art and Anil,

Please answer the following questions:

There was a question in regards to the paragraph III patent certification, it seems that the applicant inadvertently submitted a paragraph III patent certification to the risperidone (NDA 21-444) patent 5,648,093 for which you did not reference. Is that correct? If so, was this intentional and did you rely on any information for NDA 21-444?

Secondly, from an email dated 9-28-05, the applicant indicated that they only referenced Eldepryl (NDAs 20-647 and 19-334) products and would submit a paragraph II certification to correct the error. What is the submission date for the corrected paragraph II certification?

CDR Teresa Wheelous, R. Ph.

Regulatory Management Officer

DA

Division of Neurology

10903 New Hampshire Avenue, Bldg. #22

Silver Spring, MD 20993-0002

(telephone) 301-796-1161

(fax) 301-796-9842

New email address: teresa.wheelous@fda.hhs.gov

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DEPARTMENT OF HEALTH AND HUMAN SERVICES PUBLIC HEALTH SERVICE FOOD AND DRUG ADMINISTRATION			REQUEST FOR CONSULTATION	
TO (<i>Division/Office</i>): Mail: ODS (labeling & trade name review)			FROM: Division of Neurology, HFD-120	
DATE 5/15/06	IND NO.	NDA NO. 21-479	TYPE OF DOCUMENT NDA Resubmission	DATE OF DOCUMENT December 13, 2005, March 29, 2005
NAME OF DRUG Zelapar (zydis selegiline hydrochloride)	PRIORITY CONSIDERATION Standard	CLASSIFICATION OF DRUG	DESIRED COMPLETION DATE June 11, 2006	
NAME OF FIRM: Valeant Pharmaceuticals				
REASON FOR REQUEST				
COMMENTS/SPECIAL INSTRUCTIONS:				
<p>Since the due date for this application is June 14, 2006, and the hardcopy for this consult was sent in January 2006, I'm re-sending this consult for a trade name review and labeling review for Zelapar. This information is also available in the EDR.</p> <p>In addition, the sponsor is anxious to receive comments on their proposal to use in campaign 1 the blister and pouch labeling components submitted in the March 29, 2005 Complete Response with the updated carton labeling included in the December 13, 2005 Complete Response.</p> <p>Thank you, Teresa Wheelous (301) 796-1161</p>				
SIGNATURE OF REQUESTER			METHOD OF DELIVERY (Check one) <input type="checkbox"/> MAIL <input checked="" type="checkbox"/> HAND	
SIGNATURE OF RECEIVER			SIGNATURE OF DELIVERER	

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NDA 21-479 – ZELAPAR™

Minor Amendment

Complete Response to September 30, 2005 Approvable Letter

Item 2 Labeling

The revised, draft package insert for Zelapar™ is included in this section of the submission. Electronic files of the draft insert labeling will be provided to the Agency under separate cover.

The Agency's September 30, 2005 approvable letter requested that Valeant describe the specific terms included in the "tooth disorders" and "skin disorders". Due to the length of the listing of the tooth and skin disorders, the description of the specific terms is not included in the unannotated package insert but is presented with the annotated package insert (see Item 20, Section 3, Attachment K).

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41 Page(s) Withheld

 Trade Secret / Confidential (b4)

✓ Draft Labeling (b4)

 Draft Labeling (b5)

 Deliberative Process (b5)

NDA 21-479 – ZELAPAR™

Minor Amendment

Complete Response to September 30, 2005 Approvable Letter

Item 20 Complete Response to the September 30, 2005 Approvable Letter

Section 4 Revised Packaging and Labeling

Copies of the Zelapar™ labeling components that Valeant is proposing to use for campaign 1 and campaign 2 are presented in Attachment A and Attachment B, respectively. Electronic (PDF) files of these labeling components will be provided to the Agency under separate cover.

As mentioned in Section 2 of this submission, Valeant is requesting the Agency to allow us to use in campaign 1 the blister and pouch (sachet) labeling components that were submitted in the March 29, 2005 NDA 21-479 Complete Response with the updated carton labeling that has been revised to incorporate the Agency's comments in the September 30, 2005 Approvable Letter. Valeant is planning to incorporate all of the labeling changes recommended in the September 30, 2005 Approvable Letter for campaign 2.

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NDA 21-479 – ZELAPAR™

Minor Amendment

Complete Response to September 30, 2005 Approvable Letter

Item 20 Complete Response to the September 30, 2005 Approvable Letter

Section 4 Revised Packaging and Labeling

Attachment A

Proposed Blister, Pouch, and Carton Labeling for Campaign 1

10 Page(s) Withheld

 Trade Secret / Confidential (b4)

✓ Draft Labeling (b4)

 Draft Labeling (b5)

 Deliberative Process (b5)

NDA 21-479 – ZELAPAR™

Minor Amendment

Complete Response to September 30, 2005 Approvable Letter

Item 20 Complete Response to the September 30, 2005 Approvable Letter

Section 4 Revised Packaging and Labeling

Attachment B

Proposed Blister, Pouch, and Carton Labeling for Campaign 2

10 Page(s) Withheld

 Trade Secret / Confidential (b4)

✓ Draft Labeling (b4)

 Draft Labeling (b5)

 Deliberative Process (b5)

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/s/

Teresa Wheelous
5/15/2006 03:12:11 PM

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Memo

To: Russell Katz, MD
Director, Division of Neurology Products, HFD-120

From: Alina R. Mahmud, RPh, MS, Team Leader
Denise Toyer, PharmD, Deputy Director
Carol Holquist, RPh, Director
Division of Medication Errors and Technical Support, Office of Drug Safety, HFD-420

Date: January 23, 2006

Re: ODS Consult 02-0065-3
Zelapar Orally Disintegrating Tablets 1.25 mg
NDA: 21-479

This memorandum is written in response to the attached DMETS Proprietary Name Review conducted on Zelapar for the Division of Neurology (HFD-120). We have reviewed the safety evaluator's comments and disagree with the final conclusion. The review found that the proposed proprietary name was unacceptable due to the potential for confusion with _____*. Specifically, the written review states:

_____ and Zelapar both have seven letters, five of which overlap with each other. _____ The remaining two letters in each name _____ resemble each other when scripted as demonstrated in the writing sample below. Zelapar and _____ vary in regards to strength (1.25 mg vs. _____) however, they share a common dosage form (tablet), route of administration (oral), and potentially a dosage schedule (daily) if _____

A prescription written for "Zelapar UD #100" may be misinterpreted for _____ and Zelapar differ with respect to their schedules (i.e. II vs. V). Although Schedule II prescriptions are more carefully scrutinized than other prescription medications, in a hospital setting, these medications are more easily attainable because of automated medication devices such as PYXIS machines which have override functions. Areas in the hospital, such as the emergency room or the intensive care unit, may have this function set up in the event that pain symptoms need to be immediately addressed. Despite differences in dosage strength (1.25 mg vs. _____) post-marketing experience has demonstrated that errors do occur between drugs that share no commonalities other than a similar name especially when the prescription is ambiguously written. Additionally, DMETS believes that the names _____ and Zelapar, may not co-exist in the marketplace, since unfamiliarity with either product may increase the potential for a dispensing error to take place should both products be launched around similar dates. Therefore, the application that receives approval first is entitled to the name.

b(4)

b(4)

b(4)

b(4)

b(4)

b(4)



ZELAPAR

b(4)

We agree there is some similarity in the appearance of the names as stated by the safety evaluator in the above section. However, we disagree with the reviewer and believe that _____ and Zelapar can safely co-exist in the market place due to the differences in product characteristics.

b(4)

Prescriptions for _____ will be accompanied with a strength which differs from the strength of Zelapar (_____ vs. 1.25 mg). Additionally, the reviewer states that the products could potentially share the dosing schedule of "daily."

b(4)

b(4)

Moreover, the reviewer states that there is the potential for an outpatient prescription for _____ to be misinterpreted as "Zelapar UD #100." We agree that there is the potential for the dosing directions for a refill prescription for _____ to be written in this manner. However, the practitioner will also know that _____ is available in several strengths and that this information must be indicated for the prescription to be filled at the pharmacy. Lastly, Schedule II controlled substances require more stringent prescribing and dispensing processes. Thus any omission on an outpatient prescription will make it void. On an inpatient basis, the order is likely to have more detailed information such as the route of administration and the directions for administration. Despite the availability of PYXIS machines, we believe the aforementioned differences will aid in differentiating the two products.

b(4)

In conclusion, DMETS has no objection to the use of the proprietary name Zelapar. Please see the attached review for DMETS' label and labeling comments and for DDMAC comments.

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Office of Drug Safety

MEMO

To: Russell Katz, M.D.
Director, Division of Neurology Products
HFD-110

Through: Alina R. Mahmud, R.Ph., Team Leader
Denise P. Toyer, Pharm.D., Deputy Director
Carol A. Holquist, R.Ph., Director
Division of Medication Errors and Technical Support, Office of Drug Safety
HFD-420

From: Jinhee L. Jahng, Pharm.D., Safety Evaluator
Division of Medication Errors and Technical Support, Office of Drug Safety
HFD-420

Date: January 3, 2005

Re: ODS Consult 02-0065-3, Zelapar (Selegiline Hydrochloride) Orally Disintegrating Tablets
1.25 mg; NDA 21-479.

This memorandum is in response to a December 21, 2005 request from your Division for a re-review of the proprietary name, Zelapar (NDA 21-479). In previous reviews, the proposed proprietary name, Zelapar, was found acceptable by DMETS and the labels and labeling reviewed several times (See ODS Consult# 02-0065 - July 3, 2002, ODS Consult #02-0065-1 - July 15, 2003, and ODS Consult # 02-0065 - July 18, 2005). Revised container labels, carton and insert labeling were submitted and will be reviewed at this time.

Since the completion of the last proprietary name review, DMETS has identified three additional proprietary names _____, Sol Bar, and Betapar as having the potential to look and/or sound similar to Zelapar. Upon further review of the names, DMETS did not further consider Betapar as a problem because of the lack of availability of the product. Betapar was withdrawn by the sponsor on March 28, 1983 and is no longer available in the United States in brand or generic form.

1. _____ is the proposed name (ODS Consult # 05-283) for _____ may look like Zelapar when scripted.

_____ and Zelapar both have seven letters, five of which overlap with each other (i. _____. The remaining two letters in each name _____) resemble each other when scripted as

*** Name pending approval. Not FOI releasable.

demonstrated in the writing sample below. Zelapar and vary in regards to strength (1.25 mg vs. however, they share a common dosage form (tablet), route of administration (oral), and potentially a dosage schedule (daily) if . A prescription written for "Zelapar UD #100" may be misinterpreted for and Zelapar differ with respect to their schedules (i.e. II vs. V). Although Schedule II prescriptions are more carefully scrutinized than other prescription medications, in a hospital setting, these medications are more easily attainable because of automated medication devices such as PYXIS machines which have override functions. Areas in the hospital, such as the emergency room or the intensive care unit, may have this function set up in the event that pain symptoms need to be immediately addressed. Despite differences in dosage strength (1.25 mg vs. post-marketing experience has demonstrated that errors do occur between drugs that share no commonalities other than a similar name especially when the prescription is ambiguously written. Additionally, DMETS believes that the names, and Zelapar, may not co-exist in the marketplace, since unfamiliarity with either product may increase the potential for a dispensing error to take place should both products be launched around similar dates. Therefore, the application that receives approval first is entitled to the name.

b(4)

b(4)

b(4)

b(4)

Zelapar

ZELAPAR

b(4)

- Sol Bar is a sunscreen lotion which contains oxybenzone, octyl methoxycinnamate, and octocrylene and is available over-the-counter. Sol Bar is to be applied to all exposed areas thirty minutes or longer prior to sun exposure and reapplied after swimming or excessive sweating. Sol Bar may sound similar to Zelapar when spoken. Sol Bar and Zelapar's prefixes share similar sounds ("Sol" vs. "Zel"), and the second word in Sol Bar, "Bar", sounds similar to Zelapar's third syllable, "-par". The products vary in route of administration (topical vs. oral), dosage form (lotion vs. tablet), and dosage strength. Additionally, because it is unlikely that a prescriber would call in a verbal order for a sunscreen product, the recipient of a verbal order misinterpreting Zelapar for Sol Bar would most likely clarify the order with the prescriber. Despite some phonetic similarities, DMETS believes the potential for confusion is minimal because of the aforementioned reasons.

DMETS has reviewed the blister labels, pouch, carton, and insert labeling of Zelapar and has identified the following areas of possible improvement, which might minimize potential user error.

1. GENERAL COMMENTS

Insert a space in between the numeral "1.25" and unit designation "mg" (see arrows below).

Each tablet contains
1.25mg selegiline
hydrochloride

1.25mg selegiline hydrochloride

2. POUCH LABELING

Revise the ordering of the statement "~~_____~~" and present it in bullet form. For example:

b(4)

1. Store blister tablets in pouch.
2. Retain pouch for reference: DATE OPENED: _____
3. Use within 3 months of opening pouch and immediately upon opening individual blister.
4. Potency cannot be guaranteed after 3 months of opening the pouch.

3. BLISTER LABELS

- a. The dosage form (orally disintegrating tablets) does not immediately follow the established name and follows the strength instead. Revise labels to read: Zelapar (Selegiline HCl) Orally Disintegrating Tablets 1.25 mg.
- b. The proprietary and established names should be the most prominent information on the label. Increase the size or bold the established name so that it is more prominent than the "Rx only" statement.

4. CARTON LABELING (Professional Sample)

The net quantity has been omitted from the labeling. Revise to include this information on the principal display panel.

In summary, DMETS has no objections to the use of the proprietary name, Zelapar, provided that *only one name*, Zelapar (NDA 21-479) or ~~_____~~ is approved. The acceptability of the proposed proprietary name Zelapar depends on which application, Zelapar or ~~_____~~, receives approval first, as these two names may not coexist in the U.S. market due to their similarities. We consider this a final review. However, if the approval of the NDA is delayed beyond 90 days from the date of this review, the name with its associated labels and labeling must be re-evaluated. A re-review of the name before the NDA approval will rule out any objections based upon approvals of other proprietary/established names from this date forward.

b(4)

If you have any questions or need clarification, please contact DMETS Project Manager, Diane Smith, at 301-796-0538.

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/s/

Jinhee Jahng
1/26/2006 12:48:42 PM
DRUG SAFETY OFFICE REVIEWER

Alina Mahmud
1/26/2006 01:51:31 PM
DRUG SAFETY OFFICE REVIEWER

Denise Toyer
1/26/2006 02:06:40 PM
DRUG SAFETY OFFICE REVIEWER

Carol Holquist
1/26/2006 02:14:56 PM
DRUG SAFETY OFFICE REVIEWER

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Wheelous, Teresa A

From: Anil Hiteshi [ahiteshi@valeant.com]
nt: Wednesday, January 18, 2006 2:50 PM
o: Wheelous, Teresa A
Cc: William Schary
Subject: RE: Complete Response - December 13, 2005 Minor Amendment to Zelapar NDA 21-479

Follow Up Flag: Follow up
Due By: Monday, January 23, 2006 12:00 AM
Flag Status: Flagged

Attachments: cvr ltr.pdf; Section 4, pages 4-1 to 4-23 .pdf



cvr ltr.pdf (147 KB) Section 4, pages
4-1 to 4-23

Thank you for the email, Teresa.

Attached is an electronic copy of the request that we sent to the Agency on November 22, 2005.

To view the labeling proofs that are discussed in this request, please see pages 4-1 to 4-23 of our December 13, 2005 complete response. For your convenience, we are including the labeling proofs for campaign 1 and campaign 2 with this email.

Anything that you can do to obtain an answer would be most appreciated since the Agency's decision will help us in the planning and scheduling of the campaign 1 and campaign 2 Zelapar batches.

Kind regards,

Anil.

(See attached file: cvr ltr.pdf) (See attached file: Section 4, pages 4-1 to 4-23 .pdf)

Anil K. Hiteshi, R.A.C.
Associate Director, Regulatory Affairs
Valeant Research & Development
3300 Hyland Avenue
Costa Mesa, CA 92626
Tel: (714) 545-0100, x3057
Fax: (714) 641-7281
ahiteshi@valeant.com

"Wheelous,
Teresa A"
<WHEELOUST@cder.
fda.gov>

01/18/2006 05:04
AM

"Anil Hiteshi"
<ahiteshi@valeant.com>

To

cc

Subject
RE: Complete Response - December 13,
2005 Minor Amendment to Zela par NDA
21-479

"Wheelous,
Teresa A"
<WHEELLOUST@cder.
fda.gov>

"Anil Hiteshi"
<ahiteshi@valeant.com>

To

01/17/2006 08:20
AM

cc

Subject
RE: Complete Response - December 13,
2005 Minor Amendment to NDA 21-479

Anil,

Attached is a copy of the Class 2 resubmission letter that has been mailed to Valeant.

CDR Teresa Wheelous, R. Ph.
Sr. Regulatory Management Officer
FDA
Division of Neurology
10903 New Hampshire Avenue, Bldg. #22
Silver Spring, MD 20993-0002
(telephone) 301-796-2250
(fax) 301-796-9842

-----Original Message-----

From: Anil Hiteshi [mailto:ahiteshi@valeant.com]
Sent: Monday, January 16, 2006 2:55 PM
To: Wheelous, Teresa A
Cc: William Schary
Subject: Complete Response - December 13, 2005 Minor Amendment to NDA 21-479

Dear Teresa:

On December 13, 2005, we submitted as a Minor Amendment to NDA 21-479 our complete response to the Agency's September 30, 2005 approvable letter for ZelaparTM (selegiline HCl) Orally Disintegrating Tablets and have the following inquiries concerning our submission:

Please confirm that our December 13, 2005 submission was accepted for filing and considered by the FDA to be a complete response.

Please let us know whether our December 13, 2005 complete response represents a Minor Amendment or a Major Amendment (i.e. a two-month review vs. a six-month review) as determined by the Agency.

As mentioned in our November 22, 2005 letter and our December 13, 2005 submission, we would like to confirm whether it will be acceptable for Valeant to use in the first packaging campaign the existing blister and sachet labeling submitted in the March 29, 2005 complete response with



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-479

VALEANT Pharmaceuticals International
Attention: William L. Schary, PhD
Vice President, Regulatory Affairs
3300 Hyland Avenue
Costa Mesa, CA 92626

Dear Dr. Schary:

Please refer to your March 29, 2002 new drug application (NDA) submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for selegiline hydrochloride orally disintegrating tablets.

We acknowledge receipt on December 14, 2005, of your December 13, 2005 resubmission to your new drug application for selegiline hydrochloride orally disintegrating tablets.

We consider this a complete, class 2 response to our September 30, 2005 action letter. Therefore, the user fee goal date is **June 14, 2005**.

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. We note that you have not fulfilled the requirement. However, we are waiving the requirement for pediatric studies for this application.

If you have any question, call CDR Teresa Wheelous, Sr. Regulatory Project Manager, at (301)796-1161.

Sincerely,

{See appended electronic signature page}

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Russell Katz, M.D.
Director
Division of Neurology Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

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/s/

Russell Katz
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