APPLICATION NUMBER:
22-244

MICROBIOLOGY REVIEW(S)
Product Quality Microbiology Review

16 June 2008

NDA: 22-244

Drug Product Name

Proprietary: Aquavan® Injection.
Non-proprietary: Fospropofol disodium.

Drug Product Priority Classification: S.

Review Number: 1

Dates of Submission(s) Covered by this Review

<table>
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<tr>
<th>Letter</th>
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<tr>
<td>06 JUN 2008</td>
<td>06 JUN 2008</td>
<td>N/A</td>
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Applicant/Sponsor

Name: MGI Pharma, Inc.
Address: 6611 Tributary St.
Baltimore, MD. 21224-6515
Representative: Jacqueline Kline
Telephone: 410-631-8138

Name of Reviewer: John W. Metcalfe, Ph.D.

Conclusion: Recommended for approval.
Product Quality Microbiology Data Sheet

A. 1. **TYPE OF SUBMISSION:** Original NDA.

2. **SUBMISSION PROVIDES FOR:** A new drug product.

3. **MANUFACTURING SITE:**
   Baxter Pharmaceutical Solutions, LLC.
   927 S. Curry Pike
   Bloomington, IN. 47403

4. **DOSAGE FORM, ROUTE OF ADMINISTRATION AND STRENGTH/POTENCY:**
   - Solution in 30 mL vial.
   - Intravenous injection.
   - 35 mg/mL.

5. **METHOD(S) OF STERILIZATION:** [b(4)]

6. **PHARMACOLOGICAL CATEGORY:** The subject drug product is indicated for sedation in patients undergoing diagnostic or therapeutic procedures. [b(4)]

B. **SUPPORTING/RELATED DOCUMENTS:** None.

C. **REMARKS:**
The NDA is submitted electronically in the CTD format.

An Initial Quality Assessment was performed by the PAL on 06 NOV 2007. The IQA states the following regarding process validation of the subject drug product:

The applicant proposed to perform process validation on three consecutive production batches at the Baxter Pharmaceutical Solutions (BPS) Bloomington, IN facility prior to commercialization, under a pre-approved protocol using the proposed commercial manufacturing batch record. The validation protocol and manufacturing batch record will be available at the time of a pre-approval inspection. The final commercial manufacturing batch record will be provided in the first annual NDA update. Each of the three fospropofol disodium drug substance validation batches will be used during one of the three AQUAVAN process validation batches. This proposal should be assessed in consultation with the Microbiology.
Division. Microbiology should be consulted on this issue during the NDA filing.

The above issue identified by the PAL will be addressed in this review.

The following request for information was provided on 10 March 2008 to the OND Project Manager to be forwarded to the applicant:

It is stated in Module 3.2.A.1.5.3 of the NDA that holding time limits have not yet been determined and that these limits will be established based on data obtained through process validation. Have these studies been performed? Provide the holding time limits for the following time periods:

The applicant replied that the requested information would be provided once the process validation batches were completed. The NDA was amended with the requested information in a submission dated 06 June 2008. This information is summarized and reviewed in appropriate sections of this review.
Executive Summary

I. Recommendations

A. Recommendation on Approvability – NDA 22-244 is recommended for approval on the basis of product quality microbiology.

B. Recommendations on Phase 4 Commitments and/or Agreements, if Approvable – N/A.

II. Summary of Microbiology Assessments

A. Brief Description of the Manufacturing Processes that relate to Product Quality Microbiology –

B. Brief Description of Microbiology Deficiencies – There are no microbiology deficiencies identified.

C. Assessment of Risk Due to Microbiology Deficiencies – Not applicable.

III. Administrative

A. Reviewer’s Signature

   John W. Metcalfe, Ph.D.

B. Endorsement Block

   Stephen Langille, Ph.D.

C. CC Block

   N/A
Page(s) Withheld

✓ Trade Secret / Confidential (b4)

Draft Labeling (b4)

Draft Labeling (b5)

Deliberative Process (b5)

Withheld Track Number: Microbiology-9
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/
John Metcalfe
6/16/2008 05:06:52 PM
MICROBIOLOGIST

Stephen Langille
6/17/2008 02:11:28 PM
MICROBIOLOGIST
The subject NDA is suitable for filing from the standpoint of product quality microbiology.

The following request for information should be forwarded in the next outgoing communication to the applicant:

Provide the verification studies demonstrating the suitability of the sterility

or a reference to the location of this information in the 26 September 2007 submission.
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/s/
John Metcalfe
11/14/2007 11:26:54 AM
MICROBIOLOGIST

James McVey
11/14/2007 12:27:11 PM
MICROBIOLOGIST