CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

22-411

OTHER ACTION LETTERS

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 22-411 **COMPLETE RESPONSE**

Labopharm Canada
Attention: Dhushy Thambipillai
450 North Lakeshore Drive
Mundelein, IL 60060

Dear Ms. Thambipillai:

Please refer to your new drug application (NDA) dated and received September 18, 2008, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Oleptro (Trazodone Hydrochloride) Extended-Release Tablets, 150 mg and 300 mg.

We acknowledge receipt of your submissions dated:

November 26, 2008	March 25, 2009	May 21, 2009	June 24, 2009
December 22, 2008	April 16, 2009	May 26, 2009	July 2, 2009
January 15, 2009	May 6, 2009	June 9, 2009	July 8, 2009
March 4, 2009	May 15, 2009	June 10, 2009	July 9, 2009
March 5, 2009	May 20, 2009	June 12, 2009	July 13, 2009

This new drug application provides for the use of Oleptro (Trazodone Hydrochloride) Extended-Release Tablets, 150 mg and 300 mg for the treatment of Major Depressive Disorder.

We have completed the review of your application, as amended, and have determined that we cannot approve this application in its present form. We have described below our reasons for this action and, where possible, our recommendations to address these issues.

FACILITY INSPECTIONS

During a recent inspection of the (b) (4) manufacturing facility for this application, our field investigator conveyed deficiencies to the representative of the facility. Satisfactory resolution of these deficiencies is required before this application may be approved.

LABELING

Submit draft labeling that incorporates revisions in the attached labeling. In addition, submit updated content of labeling [21 CFR 314.50(l)(1)(i)] in structured product labeling (SPL) format as described at http://www.fda.gov/oc/datacouncil/spl.html.

To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version.

Additionally, we have the following advice to relay to you:

PHARMACOLOGY/TOXICOLOGY

Although not an issue for this NDA at this time, we wish to refer you to the ICH Guidances for Impurities in New Drug Substances (Q3A, 2008) and Drug Products (Q3B, 2006) for information on the need for qualification of impurities/degradants. Should it become necessary to qualify impurities/degradants with Oleptro, in addition to a general toxicology study and in vitro genotoxicity studies as specified in the guidances, an embryo-fetal development study in one species will also be required, because Oleptro will be used for treatment of a chronic indication in a patient population that includes women of childbearing potential.

Within one year after the date of this letter, you are required to resubmit or take one of the other actions available under 21 CFR 314.110. If you do not take one of these actions, we will consider your lack of response a request to withdraw the application under 21 CFR 314.65. A resubmission must fully address all the deficiencies listed. A partial response to this letter will not be processed as a resubmission and will not start a new review cycle.

Under 21 CFR 314.102(d), you may request a meeting or telephone conference with us to discuss what steps you need to take before the application may be approved. If you wish to have such a meeting, submit your meeting request as described in the FDA's *Guidance for Industry - Formal Meetings Between the FDA and Sponsors or Applicants*, May 2009 at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM153222.pdf.

The drug product may not be legally marketed until you have been notified in writing that this application is approved.

If you have any questions, call CDR Bill Bender, Regulatory Project Manager, at (301) 796-2145.

Sincerely,

{See appended electronic signature page}

Thomas Laughren, M.D.
Director
Division of Psychiatry Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

Enclosure: Package Insert & Medication Guide

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

/s/

Thomas Laughren
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