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Approval Package for:

APPLICATION NUMBER:

022462Orig1s000

Trade Name: **Gablofen 0.05mg/ml, 0.5mg/ml, 2mg/ml**

Generic Name: Baclofen Injection

Sponsor: CNS Therapeutics, Inc.

Approval Date: November19, 2010

Indications: Management of severe spasticity of cerebral or spinal origin in adult and pediatric patients age 4 years and above.

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APPROVAL LETTER

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 22-462 **NDA APPROVAL**

John J. Foster
Chief Executive Officer
CNS Therapeutics, Inc.
539 Bielenberg Drive, Suite 200
Woodbury, MN 55125

Dear Mr. Foster:

Please refer to your New Drug Application (NDA) dated March 27, 2009, received Mach 30, 2009, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Gablofen (baclofen injection) 0.05mg/ml, 0.5mg/ml, 2mg/ml (b) (4).

We acknowledge receipt of your 2009 amendments dated March 31, April 9, April 15, April 17, June 30, July 14, August 3, September 1, September 9, October 29, November 19, November 20, December 4, December 17 and December 18. Additionally, we acknowledge receipt of your 2010 amendments dated January 28, February 16, May 24, June 4 and June 7.

This new drug application provides for the use of Gablofen (baclofen injection) in the management of severe spasticity of cerebral or spinal origin in adult and pediatric patients age 4 years and above. For administrative purposes, we have designated the following:

- NDA 22-462/ Original 1 (0.05 mg/ml, 0.5mg/ml, 2mg/ml)
- (b) (4)

The subject of this action letter is NDA 22-462/Original 1. (b) (4)

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

CONTENT OF LABELING

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR

314.50(l)] in structured product labeling (SPL) format, as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm, that is identical to the enclosed labeling (text for the package insert). Information on submitting SPL files using eLIST may be found in the guidance for industry titled "SPL Standard for Content of Labeling Technical Qs and As" at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE CONTAINER LABELS

We note that you have agreed to the following revisions regarding your container labels, carton labeling, and instructions for use:

A. General Comments
1. Color is used on the principal display panel to differentiate the strengths. However, the colors are similar shades of blue or green and the strengths are represented in a black box with white lettering. The blue and green shades may be difficult to distinguish from one another and all strengths are presented in the same color which minimizes this differentiation. Use colors that provide more differentiation from each other.
2. Increase the overall size of the proprietary and established names.
3. Change the route of administration statement from (b) (4) to "For intrathecal use only" and increase the size and prominence of this statement.
4. Add the statement "Discard unused portion" and place it in conjunction with the statement "Single Use Syringe" or "Single Use Vial", as appropriate on the respective container labels and carton labeling (e.g., "Single Use Syringe—Discard Unused Portion" or "Single Use Vial—Discard Unused Portion"). If unable to fit properly on one line, place the latter portion of the statement on the next line below.
5. We note the total drug content statement is stated in "mg/mL" and the drug content per mL is stated in "mcg/mL". The use of two different dosage units may be confusing. We recommend the same units be used for the total drug content and drug content per mL. The units used should correspond with the units used in the insert labeling to specify the dosage.

B. Container Labels (50 mcg/mL syringe; 500 mcg/mL, 2000 mcg/mL (b) (4) vials)
1. The black print on colored background is difficult to read. Use colors that provide sufficient contrast to allow for easy readability of the black print.

C. Tray Labeling
1. The company name "CNS Therapeutics, Inc." is too prominent on the labeling. Relocate the name to a less prominent area on the labeling and decrease the font size.
2. Add an "Rx only" statement.

D. Carton Labeling (50 mcg/mL syringe; 500 mcg/mL, 2000 mcg/mL [redacted] (b) (4) vials)
1. The cartons have a narrow band of color at the top of the principal display and back panels and this band is used to provide color differentiation between the strengths. Due to the narrowness of the band and the similarity of the band colors between the strengths (shades of blue or green), the cartons are not well differentiated. Consider using color on a larger portion of the carton labeling in order to provide better color visibility. For example, using a colored background for the statement of strength rather than the currently used black background will provide a larger portion of color on the labeling and may also serve as a better means to differentiate the strengths.
2. Add a net quantity statement to the principal display panel of the 50 mcg/mL carton.

Submit final printed carton and container labels that are identical to the submitted carton and immediate container labels, except with the revisions listed above, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled "Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (October 2005)". Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission "Final Printed Carton and Container Labels for approved NDA 22-462." Approval of this submission by FDA is not required before the labeling is used.

Marketing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

LETTERS TO HEALTH CARE PROFESSIONALS

If you decide to issue a letter communicating important safety-related information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit, at least 24 hours prior to issuing the letter, an electronic copy of the letter to this NDA, to CDERMedWatchSafetyAlerts@fda.hhs.gov, and to the following address:

MedWatch
Food and Drug Administration
Suite 12B-05
5600 Fishers Lane
Rockville, MD 20857

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Lana Chen, Regulatory Project Manager, at (301) 796-1056.

Sincerely,

{See appended electronic signature page}

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

ENCLOSURE(S):
Content of Labeling

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

/s/

RUSSELL G KATZ
11/19/2010