CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

64-118

Trade Name: Nystop®

Generic Name: Nystatin Topical Powder USP

Sponsor: Paddock Laboratories, Inc.

Approval Date: August 16, 1996

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 64-118

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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

64-118

APPROVAL LETTER

AADA 64-118

AUG 16 1996

Paddock Laboratories, Inc.
Attention: Carol Anding
3940 Quebec Avenue North
Minneapolis, MN 55427

Dear Madam:

This is in reference to your abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Federal Food, Drug, and Cosmetic Act, for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g.

Reference is also made to your amendments dated February 16 and 23, 1996, April 9, 1996, June 14, 1996 and July 15, 1996.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly, the application is approved. The Division of Bioequivalence has determined that you Nystatin Topical Powder USP, 100,000 units/g is bioequivalent and, therefore, therapeutically equivalent to the listed drug (Mycostatin Topical Powder, 100,000 units/g of Westwood Squibb Pharmaceuticals, Inc.).

Under 21 CFR 314.70, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

Post-marketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

We request that you submit, in duplicate, any proposed advertising or promotional copy which you intend to use in your initial advertising or promotional campaigns. Please submit all proposed materials in draft or mock-up form, not final print. Submit both copies together with a copy of the proposed or final printed labeling to the Division of Drug Marketing, Advertising, and Communications (HFD-240). Please do not use Form FD-2253 (Transmittal of Advertisements and Promotional Labeling for Drugs for Human Use) for this initial submission.

We call your attention to 21 CFR 314.81(b)(3) which requires that materials for any subsequent advertising or promotional campaign be submitted to our Division of Drug Marketing, Advertising, and Communications (HFD-240) with a completed Form FD-2253 at the time of their initial use.

Sincerely yours,

/S/ 8/16/96

Douglas L. Sporn
Director
Office of Generic Drugs
Center for Drug Evaluation and Research

APPEARS THIS WAY
ON ORIGINAL

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

64-118

Final Printed Labeling

124147

Nystop™

Nystatin Topical Powder USP
For topical use only.
Not for ophthalmic use.

APPROVED
AUG 16 1996

DESCRIPTION

Nystatin Topical Powder USP is for dermatologic use.

Nystatin Topical Powder USP provides, in each gram, 100,000 USP nystatin units dispersed in talc.

CLINICAL PHARMACOLOGY

Nystatin is an antifungal antibiotic which is both fungistatic and fungicidal *in vitro* against a wide variety of yeasts and yeast-like fungi. It probably acts by binding to sterols in the cell membrane of the fungus with a resultant change in membrane permeability allowing leakage of intracellular components. Nystatin is a polyene antibiotic of undetermined structural formula that is obtained from *Streptomyces noursei,* and is the first well tolerated antifungal antibiotic of dependable efficacy for the treatment of cutaneous, oral and intestinal infections caused by *Candida* (Monilia) *albicans* and other Candida species. It exhibits no appreciable activity against bacteria.

Nystatin provides specific therapy for all localized forms of candidiasis. Symptomatic relief is rapid, often occurring within 24 to 72 hours after the initiation of treatment. Cure is effected both clinically and mycologically in most cases of localized candidiasis.

INDICATIONS AND USAGE

Nystatin Topical Powder is indicated in the treatment of cutaneous or mucocutaneous mycotic infections caused by *Candida* (Monilia) *albicans* and other Candida species.

CONTRAINDICATIONS

Nystatin Topical Powder is contraindicated in patients with a history of hypersensitivity to any of its components.

PRECAUTIONS

Should a reaction of hypersensitivity occur the drug should be immediately withdrawn and appropriate measures taken.

This preparation is not for ophthalmic use.

ADVERSE REACTIONS

Nystatin is virtually nontoxic and nonsensitizing and is well tolerated by all age groups including debilitated infants, even on prolonged administration. If irritation on topical application should occur, discontinue medication.

DOSAGE AND ADMINISTRATION

The powder should be applied to candidal lesions two or three times daily until lesions have healed. For fungal infection of the feet caused by Candida species, the powder should be dusted freely on the feet as well as in shoes and socks.

Nystatin Topical Powder does not stain skin or mucous membranes and provides a simple, convenient means of treatment.The cream is usually preferred to the ointment in candidiasis involving intertriginous areas; very moist lesions, however, are best treated with topical dusting powder.

HOW SUPPLIED

Nystatin Topical Powder USP is supplied in 15 gram plastic squeeze bottles providing, in each gram, 100,000 USP nystatin units.

Nystatin Topical Powder USP **15 grams** **NDC 0574-2008-15**

Keep tightly closed.

Store at controlled room temperature 15°-30° C (59°-86° F); avoid excessive heat (40° C; 104° F).

CAUTION:

FEDERAL LAW PROHIBITS DISPENSING WITHOUT A PRESCRIPTION.

PADDOCK LABORATORIES, INC.
Minneapolis, MN 55427

Paddock Laboratories, Inc.

124147 (5-95)

64118

Orig


NDC 0574-2008-15
Nystop™
Nystatin Topical Powder USP
100,000 USP units per gram
CAUTION: Federal law prohibits dispensing without prescription.
15 grams
Paddock
Laboratories, Inc.
Each gram contains 100,000 USP units nystatin dispersed in talc.
FOR TOPICAL USE ONLY.
Not for Ophthalmic Use.
Usual dosage: Apply to affected area 2 or 3 times daily.
See insert.
Keep tightly closed.
Store at controlled room temperature 15-30°C (59-86°F). Avoid excessive heat (40°C; 104°F).
Manufactured by Paddock Laboratories, Inc.
Minneapolis, MN 55427
122653 (08-94)
3 05742 00815 5
APPROVED
AUG 16 1996


NDC 0574-2008-15
Nystop™
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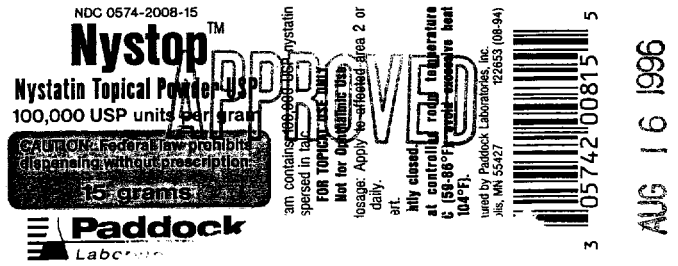
3 05742 00815 5
APPROVED
AUG 16 1996


NDC 0574-2008-15
Nystop™
Nystatin Topical Powder USP
100,000 USP units per gram
CAUTION: Federal law prohibits dispensing without prescription.
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Paddock
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104°F).
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lis, MN 55427
122653 (08-94)
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APPROVED
AUG 16 1996

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

64-118

CHEMISTRY REVIEW(S)

1. CHEMISTRY REVIEW NO. 1

2. AADA # 64-118

3. NAME AND ADDRESS OF APPLICANT

Paddock Laboratories, Inc.
3101 Louisiana Avenue North
P.O. Box 27286
Minneapolis, MN 55427

4. BASIS OF SUBMISSION
21 CFR 449.550f

5. SUPPLEMENT(s)
N/A

6. PROPRIETARY NAME
N/A

7. NONPROPRIETARY NAME
Nystatin

8. SUPPLEMENT(s) PROVIDE(s) FOR:
N/A

9. AMENDMENTS AND OTHER DATES:

Date of Application: December 27, 1993
Date of Receipt: December 29, 1993
Date Acceptable for filing: February 23, 1994
Orig. Amendment dated February 17, 1994 containing the following:

Side-by-Side Comparison of Proposed Labeling and Reference Drug Labeling.

Signed Certification of Relevant Convictions

Signed Certification of Debarment

Letter of Authorization from [redacted] and [redacted]

Certification of Authenticity of Submitted Field Copy

Refusal to file letter dated January 28, 1994

10. PHARMACOLOGICAL CATEGORY
Antifungal antibiotic

11. Rx or OTC
Rx

12. RELATED IND/NDA/DMF(s)

DMF [redacted]
DMF [redacted]
DMF [redacted]
AADA [redacted]
DMF [redacted]

13. DOSAGE FORM
Topical Powder

14. POTENCY
100,000 units/g

15. CHEMICAL NAME AND STRUCTURE
Nystatin is a substance, or a mixture of two or more substances, produced by the growth of Streptomyces noursei.

16. RECORDS AND REPORTS
N/A

17. COMMENTS

18. CONCLUSIONS AND RECOMMENDATIONS
From the Chemistry and Manufacturing standpoint the application is not approvable at this time. Issue Minor deficiency letter:

A. Chemistry Deficiencies

1.

a.

b.

c.

2. While neither the CFR nor the USP monographs for "Nystatin Topical Powder" require a test for pH, we recommend you consider establishing a test method and a specification for determining the pH of your product. The pH should also be monitored throughout the stability studies of the product.

3. The assay procedure designated for use in your stability studies is not stability indicating. A stability indicating method should be used. Degradation products should be monitored and limits set.

B. Labeling Deficiencies

Container:

Relocate the units per gram statement so that it follows the established name and increase its prominence. In addition, the net quantity should be moved and made less prominent.

Insert:

DOSAGE AND ADMINISTRATION

Add the following as the final sentence:

The cream is usually preferred to the ointment in candidiasis involving intertriginous areas; very moist lesions, however, are best treated with topical dusting powder.

Please revise your container labels and package insert labeling, then prepare and submit final printed labels and labeling.

19. REVIEWER: V.Walton

DATE COMPLETED: 5/26/94

Redacted 11

pages of trade secret and/or confidential commercial information

1. CHEMISTRY REVIEW NO. 2

2. AADA # 64-118

3. NAME AND ADDRESS OF APPLICANT

Paddock Laboratories, Inc.
3101 Louisiana Avenue North
P.O. Box 27286
Minneapolis, MN 55427

4. BASIS OF SUBMISSION
21 CFR 449.550f

5. SUPPLEMENT(s)
N/A

6. PROPRIETARY NAME
"Nystop"™

7. NONPROPRIETARY NAME
Nystatin

8. SUPPLEMENT(s) PROVIDE(s) FOR:
N/A

9. AMENDMENTS AND OTHER DATES:

Amendment dated February 3, 1995

10. PHARMACOLOGICAL CATEGORY
Antifungal Antibiotic

11. Rx or OTC
Rx

12. RELATED IND/NDA/DMF(s)
See review # 1.

13. DOSAGE FORM
Topical Powder

14. POTENCY
100,000 units/g

15. CHEMICAL NAME AND STRUCTURE

Nystatin is a substance, or a mixture of two or more substances, produced by the growth of Streptomyces noursei.

16. RECORDS AND REPORTS
N/A

17. COMMENTS

This is a review of Paddock's response (2/3/95) to our NA letter dated 6/28/94.

The following new information is supplied in the supplement:

The proposed production size batch has been changed to [redacted]. This is a [redacted] times scale-up from the demonstrated batch.

Redacted 2

pages of trade secret and/or confidential commercial information

18. CONCLUSIONS AND RECOMMENDATIONS

The application remains Not Approvable. The following deficiency will be communicated to the Firm by letter:

Please submit the following information in reference to degradant testing in the stability program:

a. The complete ~~~ method. The method as submitted is incomplete (see **Sample Preparation**).

b. Validation data for the ~~~ method.

c. ~~~~~~~~~~ labeled to show degradants.

d. Test data from at least one exhibit lot.

The proposed limit for degradants of NMT ~~ appears to be high. The limits for degradants should be established for individual and total degradants based upon accrued data.

19. REVIEWER: V.Walton

DATE COMPLETED: 5/3/95

APPEARS THIS WAY
ON ORIGINAL

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pages of trade secret and/or

confidential

commercial

information

1. CHEMISTRY REVIEW NO. 3

2. AADA # 64-118

3. NAME AND ADDRESS OF APPLICANT

Paddock Laboratories, Inc.
3101 Louisiana Avenue North
P.O. Box 27286
Minneapolis, MN 55427

4. BASIS OF SUBMISSION
21 CFR 449.550f

5. SUPPLEMENT(s)
N/A

6. PROPRIETARY NAME
"Nystop"™

7. NONPROPRIETARY NAME
Nystatin

8. SUPPLEMENT(s) PROVIDE(s) FOR:
N/A

9. AMENDMENTS AND OTHER DATES:

Amendment dated February 3, 1995
Amendment dated February 16, 1996
Amendment dated February 23, 1996
Amendment dated April 9, 1996.

10. PHARMACOLOGICAL CATEGORY
Antifungal Antibiotic

11. Rx or OTC
Rx

12. RELATED IND/NDA/DMF(s)
See review # 1.

13. DOSAGE FORM
Topical Powder

14. POTENCY
100,000 units/g

15. CHEMICAL NAME AND STRUCTURE

Nystatin is a substance, or a mixture of two or more substances, produced by the growth of Streptomyces noursei.

16. RECORDS AND REPORTS
N/A

17. COMMENTS

This is a review of the amendment dated February 16, 1996, which is in response to our NA letter dated May 22, 1995. (deficiency in bold print, response and reviewer's comments in non-bold print)

Redacted 4

pages of trade secret and/or confidential commercial information

Reviewer's comments

The limits proposed by the firm for total degradants, peak with a relative retention time of ——— and all other peaks are satisfactory. As previously noted, the data from exhibit lot 5J6664 shows the maximum amount of degradants to be ——— at the two month test station under accelerated conditions.

19. REVIEWER: V.Walton

DATE COMPLETED: 5/7/96

APPEARS THIS WAY ON ORIGINAL

Redacted 4

pages of trade secret and/or confidential commercial information

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

64-118

BIOEQUIVALENCE REVIEW

OFFICE OF GENERIC DRUGS
DIVISION OF BIOEQUIVALENCE

ANDA/AADA # Form(6) 64178 **SPONSOR:** Paddock

DRUG & DOSAGE FORM: Nystatin

STRENGTH/(s): 100,000 U/G

TYPE OF STUDY: Single/Multiple Waiver Fasting/Food

STUDY SITE:

STUDY SUMMARY: The powder contains Nystatin and Talc only

DISSOLUTION: N/A

PRIMARY REVIEWER: **BRANCH:** I

INITIAL: /S/ **DATE:** 4/29/96

BRANCH CHIEF: Y.C. Huang **BRANCH:** I

INITIAL: /S/ **DATE:** 5/2/96

DIRECTOR
DIVISION OF BIOEQUIVALENCE

for **INITIAL:** /S/ **DATE:** 4/29/96

DIRECTOR
OFFICE OF GENERIC DRUGS:

INITIAL: **DATE:**

MAR 2 1 1994

Nystatin
100,000 Units/Gram
Topical Powder
Form (6) # 64118
Reviewer: A. J. Jackson
WP #64118W.D93

Paddock Laboratories
Minneapolis, Minnesota
Submission Date:
December 27, 1993

Review of a Waiver Request for a Topical Powder

The firm has requested that the in-vivo bioequivalence requirements for its Nystatin topical powder USP 100,000 units/gram be waived per 21 CFR 320.22 (2)(ii). Comparative formulations for the test(Nystatin) and reference (Mycostatic topical powder) manufactured by Westwood-Squibb, table 1, has been submitted by the firm to support the waiver request.

Table 1. Comparative test and reference Nystatin topical powder formulations.

Ingredient	**Test**	**Reference**
Nystatin	[redacted]	[redacted]
Talc	[redacted]	[redacted]

Comments:

1. The product is a pre-1962 drug.

2. [redacted]

Recommendation:

The waiver of in-vivo bioequivalence study requirements for Paddock Laboratories Nystatin topical powder, 100,000 units/gram, is granted per 21 CFR 320.22 (2)(ii). The test product Paddock Laboratories Nystatin powder, 100,000 units/gram is therefore deemed bioequivalent to Mycostatic topical powder 100,000 units/gram, manufactured by Westwood-Squibb.

/S/

Andre' J. Jackson
Division of Bioequivalence
Review Branch I

RD INITIALLED ATWU
FT INITIALLED ATWU

/S/

Date: 3/21/94

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

64-118

ADMINISTRATIVE DOCUMENTS

MEMO FOR THE RECORD

AADA 64-118

Drug Product: Nystatin Topical Powder USP

Applicant: Paddock Laboratories, Inc.
Minneapolis, MN

This may be considered an "Addendum" to "Chemist Review No. 3".

During the final Division level review for approval of this application Deputy Director Fang raised objection to the "Composition" statement contained on page 38 of the application. The applicant indicated the active ingredient used to manufacture the topical powder product is "Nystatin For Oral Suspension USP". On page 39 the applicant elaborated on the active ingredient as follows:

"The active ingredient for the subject of this application is Nystatin for oral suspension USP. The oral suspension grade of nystatin was chosen for stock keeping purposes only.

Paddock Laboratories, Inc. currently holds an approved AADA for Nystatin For Oral Suspension USP. We do not wish to stock two grades of Nystatin powder, therefor have chosen to use the _____. The quality of the material is equivalent to or higher than the regular Nystatin USP (reference USP XXII)."

In USP 23 there is a monograph titled "Nystatin for Oral Suspension". The Deputy Director correctly points out that the description for that product states it is a "dry mixture of Nystatin with one or more suitable colors, diluents, suspending agents, flavors, and preservatives". Such a mixture is definitely not appropriate for use in manufacturing the applicant's proposed topical powder product, nor does the applicant intend to convey they intend to use such product for manufacturing use.

The applicant has an approved AADA for "Nystatin For Use In The Extemporaneous Preparation of Oral Suspensions". Such product is really plain, high quality, nystatin without excipients which is packaged and labeled for use in preparing a suspension of nystatin in a glass of water that is then taken and held in the oral cavity for as long as possible to treat yeast infection. Such nystatin is covered by the USP monograph titled

"Nystatin" and the 21 CFR monograph 449.50. The applicant wishes to use the same grade of nystatin required for the "Extemporaneous Preparation of Oral Suspension" product in manufacturing the topical powder product,i.e. its potency is not less than 5000 USP Nystatin Units per milligram.

The applicant was contacted by telephone and informed that the active ingredient in the original "Composition Statement" is incorrectly named. On July 15, 1996 a revised "Composition Statement" (page 38) was submitted which now correctly shows the drug ingredient as "Nystatin USP". The telephone amendment dated July 15, 1996, is ACCEPTABLE.

/S/ 8/7/96

File:
x:\new\firms nz\Paddock\ltrs&rev\64118.APmemo

Addendum:

The sample analysis results have returned from the lab. They were found acceptable.

/S/ 8/13/96

AADA APPROVAL SUMMARY

AADA: 64-118

DRUG PRODUCT: Nystatin Topical Powder

FIRM: Paddock Laboratories, Inc.

DOSAGE FORM: Topical Powder

STRENGTH: 100,000 units/gram

CGMP STATEMENT/EIR UPDATE STATUS: cGMP certification provided on page 110. EER issued March 13, 1996 for new manufacturing site.

BIO STUDY: The firm has requested that the in-vivo bioequivalence requirements be waived per 21 CFR 320.22 (2) (ii). Waiver granted 3/21/94 (see Bio Review; Vol 1.1)

METHOD VALIDATION - (DESCRIPTION OF DOSAGE FORM SAME AS FIRM"S): The drug substances and drug product are USP. The applicant is using the USP Antibiotics-Microbial Assay <81> for determining antibiotic potencies. The methods are based on those described in the USP and CFR.

STABILITY - (ARE CONTAINERS USED IN STUDY IDENTICAL TO THOSE IN CONTAINER SECTION): The container/closure system used in the stability study was a 1 ounce ——— round with ——— cap and ———. The containers used in the stability studies were identical to those described in the container section.

LABELING: FPL found satisfactory by Angela M. Payne; 4/23/96.

STERILIZATION VALIDATION: N/A

SIZE OF BIO BATCH (FIRM'S SOURCE OF NDS OK?): The applicant's exhibit batch was ——— (Batch #5J6654) manufactured at the new manufacturing facility (3101 Louisiana Avenue North, Minneapolis, MN 55427). The batch was manufactured with active ingredient from ——— (approved AADA ———. ——— has been withdrawn as a ——— (see chem review #2).

SIZE OF STABILITY BATCHES - (IF DIFFERENT FROM BIO BATCH, WERE THEY MANUFACTURED VIA THE SAME PROCESS?): Exhibit batch #5J6654 was used as the stability batch.

PROPOSED PRODUCTION BATCH - (MANUFACTURING PROCESS THE SAME AS BIO/STABILITY?): The proposed production batch size is ——— The manufacturing process is essentially the same as that used in manufacturing the exhibit batch.

CHEMIST: Vernon C. Walton **DATE:** 5/7/96

SUPERVISOR: John Harrison **DATE:** 5/8/96

5/13/96

RECORD OF TELEPHONE CONVERSATION

At the request of Mr. Harrison, I called Carol Anding of Paddock Laboratories to request that she submit a minor amendment to AADA 64-118 in response to today's telephone conversation.

Specifically, I read to her the one chemistry deficiency and the one chemistry comment from Vernon Walton's draft letter. I also read to her the general comment pertaining to labeling as found on the labeling worksheet dated 3/14/96.

I requested that she respond to these deficiencies in the form of a minor amendment to the AADA.

She informed me that the PAI had not been conducted at the new facility, nor have the samples been picked up by the district (both have been requested - 3/13/96).

APPEARS THIS WAY
ON ORIGINAL

DATE
March 29, 1996

APPLICATION NUMBER
64-118

IND NUMBER

TELECON

INITIATED BY _ APPLICANT/ SPONSOR X FDA

MADE X BY TELE. _ IN PERSON

PRODUCT NAME
Nystatin Topical Powder, USP

FIRM NAME
Paddock Laboratories

NAME AND TITLE OF PERSON WITH WHOM CONVERSATION WAS HELD

Carol Anding
Regulatory Affairs Manager

TELEPHONE NUMBER
(612) 546-4676

SIGNATURE

/S/
Robert L. West

attention: Dave Doleski

E L E C T R O N I C M A I L M E S S A G E

Date: 01-May-1996 11:48am EDT
From: Robert West
WESTR
Dept: HFD-617 MPN2 113
Tel No: 301-594-0375 FAX 301-594-0180

TO: Joseph David Doleski (DOLESKI)

CC: Tawni Brice (BRICET)
CC: James Wilson (WILSONJ)
CC: Vernon Walton (WALTON)
CC: John Harrison (HARRISONJ)

Subject: AADA 64-118 Paddock's Nystatin Topical Powder, USP

Dave:

I have received from Paddock Laboratories a facsimile of a letter dated April 9, 1996 from John Feldman, District Director, Minneapolis District, stating that the district has recommended approval for AADA 64-118 for Nystatin Topical Powder, USP.

You have previously informed us that the _____ is acceptable.

Please confirm with the district and forward the acceptable EER. This is a likely May approval.

Thanks,

Bob

APPEARS THIS WAY
ON ORIGINAL

PADDOCK LABORATORIES, INC.
Pharmaceuticals for Medicine, Pharmacy and Science
3940 Quebec Avenue North
Minneapolis, Minnesota 55427
Telephone: 612-546-4676
Fax: 612-546-1081

FAX COVER SHEET

Date: 4/30/96

Fax #: 301-443-3839

Attention: Bob West

Company: FDA - OGD

From: Carol Anding

TOTAL PAGES (Including Cover Sheet) 2

MESSAGE: Per our phone conservation earlier today, here is a copy of the letter from the Minneapolis district office recommending approval of AADA 64-118. Thanks for your help with info on the status of our application. Carol Anding

E L E C T R O N I C M A I L M E S S A G E

Date: 01-May-1996 11:48am EDT
From: Robert West
WESTR
Dept: HFD-617 MPN2 113
Tel No: 301-594-0375 FAX 301-594-0180

TO: Joseph David Doleski (DOLESKI)

CC: Tawni Brice (BRICET)
CC: James Wilson (WILSONJ)
CC: Vernon Walton (WALTON)
CC: John Harrison (HARRISONJ)

Subject: AADA 64-118 Paddock's Nystatin Topical Powder, USP

Dave:

I have received from Paddock Laboratories a facsimile of a letter dated April 9, 1996 from John Feldman, District Director, Minneapolis District, stating that the district has recommended approval for AADA 64-118 for Nystatin Topical Powder, USP.

You have previously informed us that the [redacted] is acceptable.

Please confirm with the district and forward the acceptable EER. This is a likely May approval.

Thanks,

Bob

APPEARS THIS WAY
ON ORIGINAL

E L E C T R O N I C M A I L M E S S A G E

Date: 10-Jul-1996 11:51am EDT
From: John Harrison
HARRISONJ
Dept: HFD-643 MPN2 279
Tel No: 301-594-0360 FAX 301-594-3839

TO: Remote Addressee (STHOMA@FDAEM@SSWMBX@FDAOC)

CC: Valerie Flournoy (FLOURNOY)

Subject: FWD: Paddock Nystatin

E L E C T R O N I C M A I L M E S S A G E

Date: 10-Jul-1996 11:05am EDT
From: John Harrison
HARRISONJ
Dept: HFD-643 MPN2 279
Tel No: 301-594-0360 FAX 301-594-3839

TO: Remote Addressee (Sharon Thoma STHOMA@FDAEM@SSWBX2FDA

Subject: Paddock Nystatin

This pertains to Paddock Laboratories' AADA 64-118 for "Nystatin Topical Powder". Please pick up samples from exhibit batch 5J6654. This is a ~~~~ batch which was manufactured at Paddock's new facility at 3940 Quebec Avenue North last September. Please try to get at least 6 immediate containers which are representative of the batch. Send them for verification analysis to CDER's antibiotic testing laboratory at 8501 Muirkirk Road, Laurel, MD 20708, labeled for the attention of Valerie Flournoy. The laboratory's assay results should be sent to the Office of Generic Drugs (Attention: Bob West HFD-643). Thank you.

John D. Harrison
Leader, Antibiotic Drug Review Team
Office of Generic Drugs (HFD-643)

APPEARS THIS WAY
ON ORIGINAL

RECORD OF TELEPHONE CONVERSATION/MEETING

DATE
7/10/96

NDA NUMBER
64-118

IND NUMBER

TELECON/MEETING

INITIATED BY
☐ APPLICANT/SPONSOR
☑ FDA

MADE
☑ BY TELEPHONE
☐ IN PERSON

PRODUCT NAME
Nystatin Topical Powder (100,000 units/gram)

FIRM NAME
Paddock Labs., Inc

NAME AND TITLE OF PERSON WITH WHOM CONVERSATION WAS HELD
Sharon Thoma
Minneapolis Dist. Office

TELEPHONE NO.
(612) 334-4100 ext. 196

10:30 AM I telephoned Sharon and ended up with her "voice-mail" device. I left a message that she should try to pick up 6 vials of the subject drug product which was manufactured at Paddock's new facility during May 1995. The batch was identified as 5J6654. The samples should be sent to Valerie Flournoy at CDER's Lab in Laurel, Md. I left my telephone number in case she had any questions.

APPEARS THIS WAY ON ORIGINAL

SIGNATURE
/S/

DIVISION

FORM FD 2587 (11/77)

ORIGINAL IND/NDA

U. S. GOVERNMENT PRINTING OFFICE: 1984-432-976/7126

RECORD OF TELEPHONE CONVERSATION/MEETING

DATE: 7/10/96

NDA NUMBER: 64-118

IND NUMBER:

TELECON/MEETING

INITIATED BY: ☐ APPLICANT/SPONSOR ☒ FDA

MADE: ☒ BY TELEPHONE ☐ IN PERSON

PRODUCT NAME: Nystatin Topical Powder (100,000 units/gram)

FIRM NAME: Paddock Labs, Inc.

NAME AND TITLE OF PERSON WITH WHOM CONVERSATION WAS HELD: Carol Anding, Reg. Affairs Manager

TELEPHONE NO.: (612)-546-4676

I called Ms. Anding to request that the "Composition Statement" (Page 38) in the subject application be revised to correct the name of the active ingredient being used to manufacture the product. I indicated the substance should be designated as "Nystatin USP" rather than "Nystatin for Oral Suspension USP". She said she would FAX the corrected page to us before the day is over.

APPEARS THIS WAY
ON ORIGINAL

DIVISION:

SIGNATURE: /S/

FORM FD 2587 (11/77)

ORIGINAL IND/NDA

U. S. GOVERNMENT PRINTING OFFICE: 1984—432-976/7126

E L E C T R O N I C M A I L M E S S A G E

Date: 28-Jun-1996 01:01pm EDT
From: Sharon Thoma
STHOMA@FDAEM@SSWMBX@FDAOC
Dept:
Tel No:

TO: HARRISONJ@A1@FDACD

Subject: Paddock Nystatin

This clarifies more on the samples.

The 03/27/96 10 day assignment request does ask to arrange for the samples to be picked up from lot 3B6275 and sent to: FDA/Division of Research and Testing ... Laurel, MD.

The 10 day response from MIN-DO to HFD-324, etc. stated that samples were collected to include lot 3B6275 and forwarded to the NYRL.

The assignment requested samples (which were picked up in 05/95); however, it lacks information on what the samples are for (e.g. monograph testing). Lot 3B6275 was collected for fingerprinting analysis and would not have been sufficient for monograph testing in 05/95 or 03/96.

If I need to do anything else at this end feel free to contact me via banyan or (612)-334-4100, ext. 196. Sharon

E L E C T R O N I C M A I L M E S S A G E

Date: 11-Jul-1996 07:02am EDT
From: John Harrison
HARRISONJ
Dept: HFD-643 MPN2 279
Tel No: 301-594-0360 FAX 301-594-3839

TO: Sharon Thoma (STHOMA@FDAEM@SSWMBX@FDAOC)

Subject: re: FWD: Paddock Nystatin

Sharon, your proposal for picking up and sending us Paddock's Nystatin Topical Powder samples before the end of next week is fine. Many thanks for you help.

John D. Harrison

APPEARS THIS WAY
ON ORIGINAL

MEMO FOR THE RECORD

Date: June 28, 1996

Application: AADA 64-118
Nystatin Topical Powder
(100,000 units nystatin/gram)

Applicant: Paddock Laboratories
Minneapolis, MN

Sharon Thoma, Investigator, Minneapolis District Office, called to check on whether I received her E-mail sent at 1:01 PM this date. I told her that I had. Her E-mail states she picked up Paddock's exhibit samples and sent them to FDA's New York Regional Laboratory. I told her we he had called NYRL and spoke with Marilyn Smith, Microbiologist, who, after looking around, concluded that NYRL did not have the samples. Ms. Thoma said the sample she collected last month was intended to be the forensic sample for the subject application. She said last year she picked up nystatin bulk samples from Paddock and sent them to Cinncinati's Forensic Laboratory for examination when they were investigating the importation of bulk samples from unapproved manufacturers. She said she never received an assignment to pick up samples of the drug product for monograph testing.

Ms. Thoma said the Paddock's Nystatin Topical Powder exhibit batch is now far beyond its original two year expiration date and she felt it would not be worth assaying even if she could get another sample. She suggested that we approve the application without testing as is done with new drug applications. She said when the District Office receives its copy of the approval letter they will automatically go to Paddock to inspect the first three commercial batches produced and obtain samples for testing at CDER's laboratory in Laurel, MD. If the samples are not of appropriate quality the District will initiate regulatory action against the product/firm.

/S/

John D. Harrison

P.S. I recommend AADA 64-118 be approved without testing due to the lack of valid samples to test at this time. The unavailability of samples at this point is not due to the applicant's negligence, but results from poor communication between headquarters and the District Office.

/S/

JDH

E L E C T R O N I C M A I L M E S S A G E

Date: 28-Jun-1996 01:01pm EDT
From: Sharon Thoma
STHOMA@FDAEM@SSWMBX@FDAOC
Dept:
Tel No:

TO: HARRISONJ@A1@FDACD

Subject: Paddock Nystatin

This clarifies more on the samples.

The 03/27/96 10 day assignment request does ask to arrange for the samples to be picked up from lot 3B6275 and sent to: FDA/Division of Research and Testing ... Laurel, MD.

The 10 day response from MIN-DO to HFD-324, etc. stated that samples were collected to include lot 3B6275 and forwarded to the NYRL.

The assignment requested samples (which were picked up in 05/95); however, it lacks information on what the samples are for (e.g. monograph testing). Lot 3B6275 was collected for fingerprinting analysis and would not have been sufficient for monograph testing in 05/95 or 03/96.

If I need to do anything else at this end feel free to contact me via banyan or (612)-334-4100, ext. 196. Sharon

E L E C T R O N I C M A I L M E S S A G E

Date: 27-Jun-1996 12:58pm EDT
From: Sharon Thoma
STHOMA@FDAEM@SSWMBX@FDAOC
Dept:
Tel No:

TO: WESTR@A1@FDACD

Subject: re: Paddock Labs - Nystatin Powder Samples

Hi Bob,

CR 95-718-187 was collected on 05/26/95 for AADA 64-118 profile samples. The samples were forwarded to the NYRL (New York Regional Lab) on 06/09/95. I do not know Valerie - is she in the NYRL? If you need any additional information just let me know.

Sharon

APPEARS THIS WAY
ON ORIGINAL

To: J. Harrison
From: V.Walton
Date: June 28, 1996

I called Marilyn Smith of the New York District Labs about samples of Nystatin Topical Powder for AADA 64-118 (FDA sample #CR 95-718-187). She checked around and they have no record of receiving samples of this product.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
FOOD AND DRUG ADMINISTRATION

TB

ESTABLISHMENT EVALUATION REQUEST

PRE APPROVAL UPDATE

REQUEST TYPE *(Check One)*	DATE	PHONE NO.	EER ID #
Original ☒ FollowUp ☐ FUR	~~May 5, 1995~~ March 13, 1996	594-0360	9764

REQUESTOR'S NAME	DIVISION	MAIL CODE
Vernon Walton/Jim Wilson	Office of Generic Drugs	**HFD-643**

APPLICATION AND SUPPLEMENT NUMBER: AADA 64-118

BRAND NAME: Nystop

ESTABLISHED NAME: Nystatin Topical Powder USP

DOSAGE STRENGTH: 100,000 units/g

STERILE ☐Yes ☒ No~

PROFILE CLASS:: POW

PRIORITY CLASSIFICATION *(See SMG CDER-4820.3)*

APPLICANT'S NAME: Paddock Laboratories

APPLICANT'S ADDRESS: 3940 Quebec Avenue North
Minneapolis, MN 55427

COMMENTS : **NOTE: PLEASE ARRANGE FOR SAMPLES PICK UP** (this was requested on original EER) from Lot 3B6275. Chinoin was listing on original EER. They have since been withdrawn. Send samples to:

FDA/Division of Research and Testing
Attn.: Chief, Antimicrobial Drugs Branch (HFD-473)
8507 Muirkirk Road
Laurel. MD
(301) 580-2715

NOTE: Manufacturing site has changed from prior EER.

FACILITIES TO BE EVALUATED

(Name and Complete Address)

	RESPONSIBILITY	DMF NUMBER/ PROFILE CODE	FKEY CIRTS ID	HFD-324 USE ONLY~	
1. Paddock Laboratories 3940 Quebec Avenue North Minneapolis, MN 55427	Manufacturing and Testing	POW	PALM 23975	AC	11/8/95
2. [redacted]	[redacted]	CFN	PIEC 23974	AC	4/6/95
[redacted]	[redacted]	NEC	LEUL 23977	AC	5/21/93
4. [redacted]	[redacted]	NEC	APAU 23978	AC	11/24/95
5.					

FOR HFD-324 USE ONLY: CSO [S] DATE RECEIVED 3/14/96

CGMP COMPLIANCE STATUS Acceptable DATE 5/15/95

FORM FDA 3274 (8/92) Distribution: Original and Yellow Copy: HFD-324.
cc: AADA 64-118 HFD-643/Div File, HFD-100/JBennett, HFD-643/CSO,Anderson HFD-/WALTON

"APPROVAL SUMMARY"

REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH

Date of Review: 4/23/96 **Date of Submission: 4/9/96 (FPL fix-a-form labels)**

Primary Reviewer: Angela M. Payne

AADA Number: 64-118 **Review Cycle: #4**

Applicant's Name [as seen on 356(h)]:Paddock Laboratories, Inc.

Manufacturer's Name (If different than applicant):same

Proprietary Name: NYSTOP™

Established Name: Nystatin Topical Powder USP, 100,000 units per gram

LABELING DEFICIENCIES, WHICH ARE TO BE INCORPORATED WITH THE CHEMISTRY COMMENTS TO THE FIRM:

[NOTE: These deficiencies can be located on the x-drive as detailed in notes from Ted Sherwood regarding the New X-Drive]

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):

Do you have 12 Final Printed Labels and Labeling? Yes

Container Labels: Regular labels submitted 2/16/96 and Fix-a-form labels submitted 4/09/96.

Professional package Insert Labeling: Submitted 2/16/96 and fix-a-form submitted 4-9-96

Revisions needed post-approval: none

BASIS OF APPROVAL:

Was this approval based upon a petition? No

What is the RLD on the 356(h) form: Mycostatin topical powder.

Revisions needed post-approval: none

BASIS OF APPROVAL:

Was this approval based upon a petition? No

What is the RLD on the 356(h) form: Mycostatin topical powder.

NDA Number: 60-578

NDA Drug Name: Nystatin Topical Powder USP

NDA Firm: Westwood Squibb

Date of Approval of NDA Insert and supplement #:
Has this been verified by the MIS system for the NDA?
Yes No

Was this approval based upon an OGD labeling guidance?
No

Basis of Approval for the Container Labels: Mycostatin topical powder.

Basis of Approval for the Carton Labeling: Mycostatin

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Applicant's Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured.	X		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X
Error Prevention Analysis			
PROPRIETARY NAME			
Has the firm proposed a proprietary name? If yes, complete this subsection.	X		
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?		X	

Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?		X	
PACKAGING -See applicant's packaging configuration in FTR			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?			X
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
LABELING			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?			X
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Error Prevention Analysis: *LABELING* (Continued)	**Yes**	**No**	**N.A.**
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	
Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?			X
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.		X	
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			X
Is the scoring configuration different than the RLD?			X
Has the firm failed to describe the scoring in the HOW SUPPLIED section?			X

Inactive Ingredients: (FTR: List page # in application where inactives are listed) page 38			
Does the product contain alcohol? If so, has the accuracy of the statement been confirmed?		X	
Do any of the inactives differ in concentration for this route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in neonates)?		X	
Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	
Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?			X
Failure to list gelatin, coloring agents, antimicrobials for capsules in DESCRIPTION?		X	
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)			X
USP Issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	
Does USP have labeling recommendations? If any, does ANDA meet them?		X	
Is the product light sensitive? If so, is NDA and/or ANDA in a light resistant container?		X	
Failure of DESCRIPTION to meet USP Description and Solubility information? If so, USP information should be used. However, only include solvents appearing in innovator labeling.		X	
Bioequivalence Issues: (Compare bioeqivalency values: insert to study. List Cmax, Tmax, T 1/2 and date study acceptable) waiver requested 3/21/94			
Insert labeling references a food effect or a no-effect? If so, was a food study done?			X
Has CLINICAL PHARMACOLOGY been modified? If so, briefly detail where/why.		X	
Patent/Exclusivity Issues: FTR: Check the Orange Book edition or cumulative supplement for verification of the latest Patent or Exclusivity. List expiration date for all patents, exclusivities, etc. or if none, please state.		X	

NOTES/QUESTIONS TO THE CHEMIST: none

FOR THE RECORD:

1. **Review based on the listed drug (Mycostatin; Westwood Squibb; Approved March 16, 1993; Revised February 1992).**

2. **Storage/dispensing information:**

AADA: CRT 15-30 C (59-86F) avoid excessive heat (40 C;104F). keep tightly closed.

NDA: Same as AADA. Information on container labels only.

USP: Preserve in well closed containers.

3. **The decision to accept the trade name was made by Angela Payne, Mark Gonitzke, and John Grace. See Label review worksheet dated 3/24/95 under FTR.**

4. **Inactive ingredients found on page 38.**

5. **Checked the 15th edition and supplement 12 for possible patents and exclusivities. none found.**

/S/ 4/26/96

Primary Reviewer Date

/S/ 4/29/96

Chief, Labeling Rev. Branch Date

cc: AADA 64-118
HFD 613/Apayne/JGrace (no cc)
njg\4/26/96\X:new\...Paddock\ltrs&rev\64118ap.ld
Review

APPEARS THIS WAY
ON ORIGINAL

REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH

Date of Review: 3/14/96 **Date of Submission: 2/16/96 (FPL minor) and 2/23/96 (draft-unsolicited)**

Primary Reviewer: Angela M. Payne

AADA Number: 64-118 **Review Cycle: #3**

Applicant's Name [as seen on 356(h)]:Paddock Laboratories, Inc.

Manufacturer's Name (If different than applicant):same

Proprietary Name: NYSTOP™

Established Name: Nystatin Topical Powder USP, 100,000 units per gram

LABELING DEFICIENCIES, WHICH ARE TO BE INCORPORATED WITH THE CHEMISTRY COMMENTS TO THE FIRM:

[NOTE: These deficiencies can be located on the x-drive as detailed in notes from Ted Sherwood regarding the New X-Drive]

A. CHEMISTRY DEFICIENCIES

B. LABELING DEFICIENCIES

1. GENERAL COMMENTS:

We acknowledge the submission of final printed labels and labels in your February 16, 1996 minor amendment. The labels and labels are satisfactory. However, we also acknowledge your comment in your February 23, 1996 amendment that for future lots, the product labels and the insert will be combined on a fix-a-form label. (that is your labels and labeling will now be one unit):

a label with an insert attached to it(fix-a-form label). Please clarify whether you are seeking approval for both types of labels and labeling prior to marketing your product. The following comments are a review of the February 23, 1996 amendment.

2. CONTAINER - Satisfactory

3. INSERT - Satisfactory

Please ~~revise your labels, as instructed above, and~~ submit final printed fix-a-form labels and labeling. Please note we reserve the right to request further changes in your labels and /or labeling based upon changes in the approved labeling of the listed drug or upon further review of the application prior to approval.

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):

Do you have 12 Final Printed Labels and Labeling? Yes

Container Labels: submitted 2/16/96 (regular)

Professional package Insert Labeling: submitted 2/16/96

Revisions needed post-approval: none

BASIS OF APPROVAL:

Was this approval based upon a petition? No

What is the RLD on the 356(h) form: Mycostatin topical powder.

NDA Number: 60-578

NDA Drug Name: Nystatin Topical Powder USP

NDA Firm: Westwood Squibb

Date of Approval of NDA Insert and supplement #:
Has this been verified by the MIS system for the NDA?
Yes No

Was this approval based upon an OGD labeling guidance?
Yes No

If yes, give date of labeling guidance:

Basis of Approval for the Container Labels: Mycostatin topical powder.

Basis of Approval for the Carton Labeling: Mycostatin

Other Comments: The labels and labeling appearing in the February 16, 1996 submission in FPL are satisfactory for approval. I will await the firms response to my general comment. I am of the opinion that the Fix-a-form labels could be submitted post approval in an annual report. The format change is considered minor.

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Applicant's Established Name	**Yes**	**No**	**N.A.**
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured.	X		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X
Error Prevention Analysis			
PROPRIETARY NAME			
Has the firm proposed a proprietary name? If yes, complete this subsection.	X		
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?		X	
Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?		X	
PACKAGING -See applicant's packaging configuration in FTR			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	

If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?			X
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
LABELING			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?			X
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Error Prevention Analysis: *LABELING* (Continued)	**Yes**	**No**	**N.A.**
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	
Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?			X
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.		X	
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			X
Is the scoring configuration different than the RLD?			X
Has the firm failed to describe the scoring in the HOW SUPPLIED section?			X
Inactive Ingredients: (FTR: List page # in application where inactives are listed) page 38			
Does the product contain alcohol? If so, has the accuracy of the statement been confirmed?		X	
Do any of the inactives differ in concentration for this route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in neonates)?		X	
Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	

Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?			X
Failure to list gelatin, coloring agents, antimicrobials for capsules in DESCRIPTION?		X	
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)			X
USP Issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	
Does USP have labeling recommendations? If any, does ANDA meet them?		X	
Is the product light sensitive? If so, is NDA and/or ANDA in a light resistant container?		X	
Failure of DESCRIPTION to meet USP Description and Solubility information? If so, USP information should be used. However, only include solvents appearing in innovator labeling.		X	
Bioequivalence Issues: (Compare bioeqivalency values: insert to study. List Cmax, Tmax, T 1/2 and date study acceptable) waiver requested 3/21/94			
Insert labeling references a food effect or a no-effect? If so, was a food study done?			X
Has CLINICAL PHARMACOLOGY been modified? If so, briefly detail where/why.		X	
Patent/Exclusivity Issues: FTR: Check the Orange Book edition or cumulative supplement for verification of the latest Patent or Exclusivity. List expiration date for all patents, exclusivities, etc. or if none, please state.		X	

NOTES/QUESTIONS TO THE CHEMIST: none

FOR THE RECORD:

1. Review based on the listed drug (Mycostatin; Westwood Squibb; Approved March 16, 1993; Revised February 1992).

2. Storage/dispensing information:

   AADA: CRT 15-30 C (59-86F) avoid excessive heat (40 C;104F). keep tightly closed.

   NDA: Same as AADA. Information on container labels only.

   USP: Preserve in well closed containers.

3. The decision to accept the trade name was made by Angela Payne, Mark Gonitzke, and John Grace. See Label review worksheet dated 3/24/95 under FTR.

4. **Inactive ingredients found on page 38.**

5. **Checked the 15th edition and supplement 12 for possible patents and exclusivities. none found.**

/S/ 3/14/96

Primary Reviewer Date

/S/ 3/14/96

Chief, Labeling Rev. Branch Date

cc: AADA 64-118
HFD 613/Apayne/JGrace (no cc)
njg\3/14/96\X:new\...Paddock\ltrs&rev\64118.na3l
Review

APPEARS THIS WAY
ON ORIGINAL

RECORD OF TELEPHONE CONVERSATION/MEETING

I called Ms. Ersted with regard to their pending application 64-118. I explained we had received an unsatisfactory EER which said the firm was not ready for inspection. We have listed on the EER their old manufacturing site at Louisiana Ave. N. I asked for clarification. Ms. Ersted explained the old facility where the exhibit batch was made is largely closed down. Equipment from there is being moved or has been moved to the new facility (Quebec Ave.). The new facility has recently been inspected for other Paddock products. But in the case of 64-118 Ms. Ersted confirmed the facility was not ready for this product. She said firm realizes it will need to make a new exhibit batch and submit supporting data from the new facility. They intend to submit their amendment in December and they realize OGD will consider it to be a major amendment (eventhough the last deficiency letter we issued was a minor).

DATE
7/5/95

AADA NUMBER
64-118

IND NUMBER

TELECON

INITIATED BY	**MADE**
_ **APPLICANT/ SPONSOR**	X **BY TELE.**
X **FDA**	_ **IN PERSON**

PRODUCT NAME
Nystatin Topical Powder

FIRM NAME
Paddock labs

NAME AND TITLE OF PERSON WITH WHOM CONVERSATION WAS HELD
Mary Beth Ersted

TELEPHONE NUMBER
612-546-4676

SIGNATURE
/S/

During the current inspection an FD-483, Inspectional Observations, was issued to management citing 23 objectionable conditions which were limited in their relationship to the profile class ("POW") for these five AADA's. For example, there were five repackaged powders other than the referenced AADA's which did not have stability data on file to support expiration dating on the repackaged container/closure systems prior to 05/10/95. Deficiencies also included problems with testing/validation of specific repackaged powders. GMP problems were uncovered with the firms documentation of ambient relative humidity (RH) for the room temperature stability room and the temperature/RH controls for the accelerated chamber; however, stability testing for the referenced AADA's is performed by an outside contract laboratory. Problems were found with the firm's media testing; however, microbial assays for the AADA's are also conducted by an outside laboratory. Other objectionable conditions did not directly involve these AADA's and/or were not considered significant GMP violations which would warrant a non-approval recommendation of four of these five filed applications.

I am recommending approval at the district level for four applications, namely, AADA for AADA for AADA 62-613/S-007 for Nystatin Powder for Extemporaneous Preparation of Oral Suspension; and AADA for

I am not recommending approval of Nystatin Topical Powder, AADA 64-118, because the firm was not ready for inspection. To date the firm has not filed a supplement for transfer of the manufacturing site of the FIRST generic version of Nystatin Topical Powder. In addition, installation/operation qualifications (IQ/OQ) for the referenced in the major amendment has not been performed to date. According to management, Paddock Laboratories will most likely file an amendment to the application for site transfer since one does not generally file a supplement for an unapproved application.

Forensic samples, including the finished product, active and inactive ingredients for the following five AADAs were forwarded to the NYRL for fingerprint analysis: AADA AADA AADA for AADA 62-613 for Nystatin powder for extemporaneous preparation of oral suspension; and AADA 64-118 for Nystatin topical powder. Samples are covered by CR #s 95-717-675/676/677/678 and 95-718-187, respectively.

Note that in the initial assignment for Nystatin Topical Powder, 100,000 units/gram, AADA 64-118, the reviewer recommended that forensic samples be collected from two lots (3B6265 and 3B6275) of product which used two different sources of bulk drug. The finished product lot 3B6265 was not collected for fingerprint analysis since the firm has withdrawn as a proposed for the bulk Nystatin drug substance. The withdraw of is found on page one of the AADA 64-118 major amendment, dated February 03, 1995.

John Feldman, DD
Minneapolis District, HFR-MW300

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
FOOD AND DRUG ADMINISTRATION

J

ESTABLISHMENT EVALUATION REQUEST

REQUEST TYPE *(Check One)* ☒ Original ☐ Follow-Up ☐ FUR	DATE 6/1/94	PHONE NO. 594-0360	EER ID # 6438
REQUESTOR'S NAME Verron Walton / Jim Wilson		DIVISION OGD	MAIL CODE HFD- 643
APPLICATION AND SUPPLEMENT NUMBER 64-118			
BRAND NAME		ESTABLISHED NAME NYSTATIN	
DOSAGE AND STRENGTH TOPICAL POWDER 100,000 UNITS/GM			STERILE ☐ YES ☒ NO
PROFILE CLASS POW		PRIORITY CLASSIFICATION *(See SMG CDER-4820.3)*	
APPLICANT'S NAME PADDOCK LABORATORIES			
ADDRESS 3101 LOUISIANA AVE N. MINNEAPOLIS, MN 55427			
COMMENTS Please pick up samples from lots 3B6265 and 3B6275 (different sources of bulk drug used) 1st generic			

FACILITIES TO BE EVALUATED

(Name and Complete Address)

	RESPONSIBILITY	DMF NUMBER/ PROFILE CODE	F KEY/ CIRTS ID	HFD-324 USE ONLY	
1. APPLICANT	MANUFACTURING & TESTING FACILITIES	APAN / NEC	PALM 16287	AC	Not Ready
2.		ANADA — / CFN	CHEB 16288	Withdrawn	
3.		ANADA — / CFN	Piee ~~PIGA~~ 16289	AC	5/6/93
4.		— / NEC	LELR 16290	AC	5/21/93
5.		— / NEC	APAN 16291	AC	5/14/93

FOR HFD-324 USE ONLY:	CSO I. ASM	DATE RECEIVED JUN 2 1994
	CGMP COMPLIANCE STATUS unacceptable	DATE 6/28/94

FORM FDA 3274 (8/92) Distribution: Original and Yellow Copy: HFD-324. Remaining Copies: Requesting Office

E L E C T R O N I C M A I L M E S S A G E

Date: 23-Jun-1995 08:42am EDT
From: Sharon Thoma
STHOMA@FDAEM@SSWMBX@FDAOC
Dept:
Tel No:

TO: DOLESKI@A1@FDACD

Subject: 5 AADA responses.

Forwarded to: SSWGATE@FDA-SSW@Servers[FDACD.DOLESKI]
cc:
Comments by: Sharon Thoma@MIN.IB@FDAORAMWR
Comments:

AADA Paddock

---------- [Original Message] ----------
This is the follow-up per 10 day notification requests dated 03/20/95 for four AADA's and one AADA verbally discussed with Dave Doleski via telephone.

To: HFD-324/Mark A. Lynch
Info: HFR-MA1/Joseph Philips
HFC-240/William T. Lampkin
HFC-240/Gillie Kovalsky
MIN-DO

Date: June 13, 1995

From: John Feldman, District Director
Minneapolis District, HFR-MW300

AADA: [redacted] 62-613/S-007; [redacted]; and 64-118. Follow-up per 10 day notification requests dated 03/20/95.

Products: [redacted]

Nystatin Powder for Extemporaneous Preparation of Oral Suspension;

[redacted]

Nystatin Topical Powder

Applicant and Establishment:

Paddock Laboratories
3940 Quebec Avenue North
Minneapolis, MN 55427
CFN: 2127022

A CGMP inspection of the newly designed facility of Paddock Laboratories, 3940 Quebec Avenue North, Minneapolis, MN was conducted on 04/14-26/95 and 05/21-31/95 to assess the firm's ability to repackage and test the five supplemental applications referenced above. This inspection was interrupted by a CDER Compliance Branch assignment which required more immediate attention. The firm was not visited from 05/01/95 to 05/21/95.

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
FOOD AND DRUG ADMINISTRATION

ESTABLISHMENT EVALUATION REQUEST

APPROVAL UPDATE

REQUEST TYPE *(Check One)*	DATE	PHONE NO.	EER ID #
☐ Original ☒ FollowUp ☐ FUR	May 5, 1995	594-0360	

REQUESTORS NAME: Vernon Walton/Jim Wilson	DIVISION:Office of Generic Drugs	MAIL CODE: **HFD-643**

APPLICATION AND SUPPLEMENT NUMBER:
AADA 64-118

BRAND NAME:	ESTABLISHED NAME: Nystatin Topical Powder USP

DOSAGE STRENGTH: 100,000 units/g	STERILE ☐Yes ☒ No~

PROFILE CLASS:: POW	PRIORITY CLASSIFICATION *(See SMG CDER-4820.3)*

APPLICANT'S NAME: Paddock Laboratories

APPLICANT'S ADDRESS: 3940 Quebec Avenue North
Minneapolis, MN 55427

COMMENTS : **NOTE: PLEASE ARRANGE FOR SAMPLES PICK UP** (this was requested on original EER) from Lot 3B6275. Chinoin was listing on original EER. They have since been withdrawn. Send samples to:

FDA/Division of Research and Testing
Attn.: Chief, Antimicrobial Drugs Branch (HFD-473)
200 C. Street, S.W., Room 2002
Washington, D.C. 20204
(202) 205-4133

FACILITIES TO BE EVALUATED

(Name and Complete Address)

	RESPONSIBILITY	DMF NUMBER/ PROFILE CODE	FKEY CIRTS ID	HFD-324 USE ONLY~
1. Paddock Laboratories 3101 Louisiana Avenue North Minneapolis, MN 55427	Manufacturing and Testing	POW		
[illegible]	[illegible]	CFN		
[illegible]	[illegible]	NEC		
[illegible]	[illegible]	NEC		
5.				

FOR HFD-324 USE ONLY:	CSO	DATE RECEIVED
	CGMP COMPLIANCE STATUS	DATE

FDA 3274 (8/92) Distribution: Original and Yellow Copy: HFD-324.
A 64-118 HFD-643/Div File, HFD-100/JBennett, HFD-643/CSO,Anderson HFD-/WALTON

Faxed 5/23/95

1/1

OFFICE OF GENERIC DRUGS, CDER, FDA
Document Control Room
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

DATE: May 23, 1995

TO: Paddock Labs

Attn: Mary Beth Erstad

PHONE: (612) 546-4676

FAX: 612 546 4842

FROM: Bob West, for Mark Anderson

PHONE: (301) 594-0360

FAX: (301) 594-0180

NUMBER OF PAGES: 2
(Excluding Cover Sheet)

With this facsimile, the Office of Generic Drugs is providing you with a copy of a not approvable letter requesting your response in the form of a **MINOR AMENDMENT** for the following abbreviated new drug/antibiotic application:

ANDA/AADA NUMBER: 64-118 DATE OF LETTER: May 22, 1995

NAME OF DRUG PRODUCT: Nystatin Topical Powder

SPECIAL INSTRUCTIONS:

REVIEW OF PROFESSIONAL LABELING #2

ANDA

DRAFT

DATE OF REVIEW: March 24, 1995

AADA #: 64-118

NAME OF FIRM: Paddock Laboratories

NAME OF DRUG: Trade: NYSTOP
Generic: Nystatin Topical Powder USP, 100,000 units per gram

DATE OF SUBMISSION: February 3, 1995

GENERAL COMMENTS:

We acknowledge your comment regarding your proposed proprietary name. We find your proprietary name "NYSTOP" acceptable.

Container: 15 gram - Statisfactory, ~~however~~ ,

Please ensure the readability of the information in the darkened box.

Insert:

Corrected on e-submission 4/21/95 /S/

1. Your proprietary name should appear before the established name on the first line of the DESCRIPTION section as well as the HOW SUPPLIED section. The established name should then appear in parenthesis.

2. Combine paragraphs 2 and 3 in the DOSAGE AND ADMINISTRATION section.

RECOMMENDATIONS:

1. Inform the firm of the above comments.

2. Request the firm revise their insert labeling, then prepare and submit final printed labels and labeling.

FOR THE RECORD:

1. Review based on the listed drug (Mycostatin; Westwood Squibb; Approved March 16, 1993; Revised February 1992).

2. The innovator uses a combined insert labeling. The generic company does not. The generic insert labeling reflects only the powder dosage form in the folowing

sections: INDICATION AND USAGE, CONTRAINDICATIONS, PRECAUTIONS, and DOSAGE ADMINISTRATION.

3. Storage/dispensing information:

AADA: CRT 15°-30° C (59°-86°F); avoid excessive heat (40°C; 104°F). Keep tightly closed.

NDA: Same as AADA. Information on container labels only.

USP: preserve in well closed containers.

4. In this amendment the firm proposes a trade name NYSTOP. The prefix NYST has been used before in NYSTEX. The suffix "top" has been used before in such Nimotop (a liquid for neurological problems). The Drug Index 1994 has mykrox (metolazone a tablet used as a diuretic). Nimotop and Mykrox may sound like NYSTOP however, due to the fact that the dosages forms of these products are markedly different,the chances of a medication error occurring is null. I conferred with John Grace (a member of the L and N committee) and Mark Gonitzke. We agree that the name appears acceptable. We see little reason to submit this proprietary name "Nystop" to the Labeling and Nomenclature Committee at this time.

Angela Payne

/S/ 4/20/95

cc: AADA 64-118
HFD-613/APayne/Gonitzke/JPhillips (no cc)
njg/4/10/95/64118FEB.95
Review
final

/S/ 4/20/95

/S/ 4/21/95

REVIEW OF PROFESSIONAL LABELING #1

ANDA

DRAFT

DATE OF REVIEW: June 2, 1994

AADA #: 64-118

NAME OF FIRM: Paddock Laboratories

NAME OF DRUG: Nystatin Topical Powder USP, 100,000 units per gram

DATE OF SUBMISSION: February 17, 1994 and December 27, 1993

COMMENTS:

Container:

Relocate the units per gram statement so that it follows the established name and increase its prominence. In addition, the net quantity should be moved and made less prominent.

Insert:

DOSAGE AND ADMINISTRATION

Add the following as the final sentence:

The cream is usually preferred to the ointment in candidiasis involving intertriginous areas; very moist lesions, however, are best treated with topical dusting powder.

RECOMMENDATIONS:

1. Inform the firm of the above comments.

2. Request the firm revise their container labels and package insert labeling, then prepare and submit final printed labels and labeling.

FOR THE RECORD:

1. Review based on the listed drug (Mycostatin; Westwood Squibb; Approved March 16, 1993; Revised February 1992).

2. The innovator uses a combined insert labeling. The generic company does not. The generic insert labeling reflects only the powder dosage form in the folowing sections: INDICATION AND USAGE, CONTRAINDICATIONS, PRECAUTIONS, and DOSAGE ADMINISTRATION.

NDA: Same as AADA. Information on contianer labels only.

USP: preserve in well closed containers.

Angela Payne

/S/

cc: AADA 64-118
HFD-613/APayne/JPhillips (no cc)
mpd/6/6/94; 64118FEB.94
Review
Final

6/6/94

/S/ 6/6/94

APPEARS THIS WAY
ON ORIGINAL

HFD-643 Walton

DATE: JUN 3 1994

TO: Director
International & Technical Operations Branch, HFC-134

FROM: Chief,
Investigations & Compliance Evaluation Branch, HFD-324

SUBJ: Inspection Out of Date
ANDA 64-118, Nystatin
Topical Powder, 100,000
units/gram

Applicant:
Paddock Laboratories
3101 Louisiana Avenue N.
Minneapolis, MN 55427

PROFILE: CFN

REVIEWER: Vernon Walton
TELEPHONE: 301-594-0360

Establishment:

CFN #:
DMF #:

In connection with FDA's review of **ANDA 64-118**, please conduct an inspection of the above referenced foreign firm. The application provides for this establishment to manufacture the new drug substance for the above referenced product. For guidance, refer to CP 7346.832, Pre-Approval Inspections.

In preparing this assignment, we relied on the MPQAS drug quality assurance profile which reports that this firm was last inspected in **October 1991 for "CRU"**. A GMP inspection is necessary unless there has been a recent inspection. If there has been recent coverage, or if the profile is not accurate, please call within one week to discuss the need for the inspection and update the QAP through the usual means.

In communicating with this office (FTS 301-594-0098), reference should be made to **ANDA 64-118**. Responses recommending approval should be forwarded as expeditiously as possible via facsimile (FAX) or EMS and should not wait for final report preparation and routing. Please direct your response to the attention of the Investigations & Compliance Evaluation Branch, HFD-324.

/S/
Mark A. Lynch

[ ] Approvable or [ ] Not Approvable per inspection of __/__/__

[ ] Scheduled EI __/__/__

signature

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
FOOD AND DRUG ADMINISTRATION

ESTABLISHMENT EVALUATION REQUEST

REQUEST TYPE *(Check One)* ☒ Original ☐ Follow-Up ☐ FUR	DATE 6/11/94	PHONE NO. [illegible] 0360	EER ID #
REQUESTOR'S NAME Vernon Walton / Jim Wilson		DIVISION DSD	MAIL CODE HFD- [illegible]
APPLICATION AND SUPPLEMENT NUMBER 64-118			
BRAND NAME	ESTABLISHED NAME NYSTATIN		
DOSAGE AND STRENGTH TOPICAL Powder 100,000 units/gm			STERILE ☐ YES ☒ NO
PROFILE CLASS POW	PRIORITY CLASSIFICATION *(See SMG CDER-4820.3)*		
APPLICANT'S NAME PADDOCK LABORATORIES			
ADDRESS 3101 Louisiana Ave N. Minneapolis, MN 55427	APPEARS THIS WAY ON ORIGINAL		
COMMENTS Please pick up samples from Lots [illegible] (2 different sources of bulk drug used)			

FACILITIES TO BE EVALUATED
(Name and Complete Address)

	RESPONSIBILITY	DMF NUMBER/ PROFILE CODE	F KEY/ CIRTS ID	HFD-324 USE ONLY	
1. APPLICANT	MANUFACTURING & TESTING FACILITIES	— NEC			
2. [illegible]		[illegible] CFN	1		
3. [illegible]		[illegible] CFN			
4. [illegible]		— NEC			
5. [illegible]		— NEC			

FOR HFD-324 USE ONLY:		
	CSO	DATE RECEIVED
	CGMP COMPLIANCE STATUS	DATE

FORM FDA 3274 (8/92) Distribution: Original and Yellow Copy: HFD-324. Remaining Copies: Requesting Office

M E M O R A N D U M

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Food and Drug Administration
Center for Drug Evaluation and Research

TO: Division of Bioequivalence (HFD-650) DATE:

FROM: Director, HFD-600
Office of Generic Drugs

SUBJECT: Request for Review

Paper NDA/ANDA/IND #: N064118

Doc Set Type: N 000 Letter Date: 27-DEC-93

Company Name: PADDOCK LABS

Established Name:
NYSTATIN

Dosage Form: PDR Potency: 100,000 UNITS\GRAM

Please review the data on the above drug.

Thank you,

/S/

Roger L. Williams, M.D.

Approved Listed Drug:

Bio Reference Drug:

Completed and Sent to Office of Generic Drugs: __-___-__

Redacted 1

pages of trade secret and/or confidential commercial information

1/3/94

Mary Beth Erstad Paddock Labs 64-118

Informed MB Erstad that in the future her applications need to be bound on acco fasteners and the original needs to be on blue jacket and dup needs to be on red jacket. This time I handled it. Next time we will have to return application

/S/

APPEARS THIS WAY
ON ORIGINAL

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

64-118

CORRESPONDENCE

Paddock
Laboratories, Inc.

Reviewed in memorandum dated 8/7/96 by J. Harrison.
/S/ 8/14/96

Pharmaceuticals for Medicine, Pharmacy and Science

AMENDMENT

July 15, 1996

RECEIVED
JUL 22 1996
GENERIC DRUGS

Office of Generic Drugs
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II, HFD-600
7500 Standish Place, Room 150
Rockville, MD 20855-2773

Re: Minor Amendment to AADA 64-118
for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g

Dear Staff:

Please accept this amendment to our pending abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Federal Food, Drug , and Cosmetic Act, for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g, AADA 64-118.

Per my July 10, 1996, phone conversation with Team Leader, John Harrison and Project Manager, Robert West, we are submitting a corrected page 038 of the original December 27, 1993, submission of this application. This correction is merely a clarification that the drug active is Nystatin USP rather than Nystatin for Oral Suspension USP as specified originally. This does not involve a change in the active ingredient, this is just the correction of an inadvertent error. Please call if you have any questions or need additional information.

Review and archival copies are included in this submission. A third copy has been sent to the Minneapolis District Office (field copy).

Paddock Laboratories, Inc., does hereby certify that the submitted field copy is a true copy of the technical section of this application [21 CFR 314.94(d)(5)].

Sincerely,

Carol Anding

Carol Anding
Regulatory Affairs Manager

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

Pharmaceuticals for Medicine, Pharmacy and Science

June 27, 1996

John Harrison
Office of Generic Drugs
Center for Drug Evaluation and Research
Food and Drug Administration

FAX COMMUNICATION - 301-443-3839

Re: AADA 64-118 for NYSTOP ™ (Nystatin Topical Powder USP), 100,000 units/g
Laboratory Test Sample Information

Dear John:

We have been working with Bob West to locate the samples of Nystatin Topical Powder for proposed AADA 64-118 (FDA sample #CR 95-718-187). Bob had communicated via e-mail with Investigator, Sharon K. Thoma of the Minneapolis District Office in attempt to find out where she had sent the samples. I spoke with Sharon Thoma who informed me that the samples had been sent to the New York laboratory.

Sharon said she has responded to Bob's e-mail with this information. Bob left me a message that he would be out of the office this afternoon and all of Friday. Perhaps Bob has already made arrangements for someone to work on this in his absence. If this is not the case, we wanted to let you know the latest we've heard and see if you could have someone else track down the samples while Bob is out of the office. This is so important to us and each day of delay is starting to add up.

Please call if you have any questions. We appreciate Bob's help thus far. We know that you are all staying on top of this and we appreciate anything you can do to keep it moving forward.

Sincerely,

Carol Anding

Carol Anding
Regulatory Affairs Manager

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

Paddock Laboratories, Inc.

Note - the samples referenced below were NOT analyzed for methods validation/verification - Mr. Thorgeson arranged for the district to obtain fresh samples from the firm. Refer to analyst worksheets 7/8/96.

DRUG AMENDMENT

Pharmaceuticals for Medicine, Pharmacy and Science

June 14, 1996

Office of Generic Drugs
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II, HFD-600
7500 Standish Place, Room 150
Rockville, MD 20855-2773

RECEIVED
JUN 20 1996
GENERIC DRUGS

Re: Minor Amendment to AADA 64-118
for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g

Dear Staff:

Please accept this amendment to our pending abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Federal Food, Drug , and Cosmetic Act, for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g, AADA 64-118.

Per my June 14, 1996, phone conversation with CSO, Bob West, we are submitting additional stability data on lot 3B6275 of Nystatin Topical Powder USP. Lot 3B6275 served as the demonstration batch in our original December 27, 1993, submission of this application. It is the lot from which the Minneapolis District office collected samples on May 31, 1995, for purposes of confirmatory monograph testing for this application. As Mr. West and I discussed, these samples are now over a year past their two year expiration dating. As part of this discussion, Mr. West recommended that we submit any additional stability data we have obtained on this lot. Attached is a summary of the shelf life or real-time stability data for lot 3B6275 of Nystatin Topical Powder USP. The lot was manufactured on February 18, 1993.

Please call if you have any questions or need additional information.

Review and archival copies are included in this submission. A third copy has been sent to the Minneapolis District Office (field copy).

Paddock Laboratories, Inc., does hereby certify that the submitted field copy is a true copy of the technical section of this application [21 CFR 314.94(d)(5)].

Sincerely,

Carol Anding

Carol Anding
Regulatory Affairs Manager

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

Paddock
Laboratories, Inc.

Pharmaceuticals for Medicine, Pharmacy and Science

NDA ORIG AMENDMENT
N/Am

RECEIVED
APR 11 1996
GENERIC DRUGS

April 9, 1996

Office of Generic Drugs
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II, HFD-600
7500 Standish Place, Room 150
Rockville, MD 20855-2773

Re: Minor Amendment to AADA 64-118 for
NYSTOP ™ (Nystatin Topical Powder USP), 100,000 units/g
in Response to the March 29, 1996, Deficiency/Comments communicated
by CSO, Bob West, via telephone communication

Dear Staff:

Please accept this letter in response to the deficiency and comments communicated by the Agency on March 29, 1996, regarding our abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Federal Food, Drug, and Cosmetic Act, for NYSTOP ™ (Nystatin Topical Powder USP), 100,000 units/g, AADA 64-118.

We respond to the specific deficiency and comments (deficiency or comment in bold print, response in non-bold print) as follows:

A. Chemistry Deficiency

1. **The proposed limit for degradants of NMT [redacted] appears to be high. The accelerated stability data from exhibit lot 5J6664 show a maximum amount of degradants to be [redacted] at the 2 month test station. Limits should be established for individual and total degradants based upon your data.**

   Based on data acquired thus far, we are proposing a limit of total degradants of NMT [redacted] We propose a limit of NMT [redacted] for the peak with a relative retention time of [redacted] (or approximately [redacted] We propose a limit of NMT [redacted] for all other peaks.

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

A. Chemistry Deficiency (continued)

GENERAL COMMENTS:

It was noted in your stability studies that testing is not being performed at the recommended stability test stations. Samples should be analyzed initially and at the 1, 2, and 3 month periods.

We acknowledge your comment and will be more accurate in regards to performing stability studies at recommended stability test stations. We wish to clarify that samples were in fact removed from the chamber at the proper time and sent to the appropriate laboratory for testing.

B. Labeling Deficiencies

GENERAL COMMENTS:

Container labels are satisfactory.

Acknowledged.

Inserts are satisfactory.

Acknowledged.

We acknowledge the submission of FPL in your February 16, 1996, minor amendment. The labels and labeling are satisfactory. However, we also acknowledge your comments in your February 23, 1996, amendment that for future lots, the product labels and the insert will be combined on a Fix-a-form label. That is, your label and labeling will be one unit.

Please clarify whether you are seeking approval for both types of labels and labeling prior to marketing your product. If so, please submit FPL Fix-a-form labels and labeling.

We are seeking approval for both types of labels and labeling prior to marketing our product. Attachment 1 contains twelve (12) copies of FPL Fix-a-form labels (label/insert combination).

Review and archival copies are included in this submission. A third copy has been sent to the Minneapolis District Office (field copy).

Paddock Laboratories, Inc., does hereby certify that the submitted field copy is a true copy of the technical section of this application [21 CFR 314.94(d)(5)].

Please call if you have any questions or need further information.

Sincerely,

Carol Anding

Carol Anding
Regulatory Affairs Manager
Paddock Laboratories, Inc.

APPEARS THIS WAY
ON ORIGINAL

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Minneapolis District
240 Hennepin Avenue
Minneapolis, MN 55401
Telephone: 612-334-4100

Date: April 09, 1996

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Bruce G. Paddock, R.Ph.
President/CEO
Paddock Laboratories, Inc.
3940 Quebec Avenue North
New Hope, MN 55427

Dear Mr. Paddock:

A pre-approval inspection (PAI) was conducted at your facility in May 1995. The most recent inspection conducted on October 30 through November 08, 1995 included a follow-up inspection to verify the adequacy of inspectional corrections made by your firm concerning the May 1995 inspection.

Objectionable conditions cited as a result of the inspection included stability deficiencies for "specific" powdered products unrelated to this application. Based on the inspectional findings and corrective actions implemented to date, the Minneapolis District Office is recommending approval of AADA 64-118 for Nystatin Topical Powder USP; 100,000 units/g. Upon notification from the Center For Drug Evaluation & Research that the application is approved, the Minneapolis District may conduct an inspection to assure that validation has been completed.

It is your responsibility to ensure that all of the requirements of the Federal Food, Drug and Cosmetic Act and regulations promulgated thereunder are being met. It is your responsibility to ensure that validation is completed prior to shipment of any product in interstate commerce. Please note that an adulterated product may be subject to regulatory action.

Sincerely yours,

/S/

John Feldman
District Director
Minneapolis District

HFR-MW350:04/09/96

cc: MIN-DO

Paddock
Laboratories, Inc.

NDA ORIG AMENDMENT
AA

Pharmaceuticals for Medicine, Pharmacy and Science

February 23, 1996

Office of Generic Drugs
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II, HFD-600
7500 Standish Place, Room 150
Rockville, MD 20855-2773

Re: Amendment to AADA 64-118
for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g

Dear Staff:

Please accept this amendment to our pending abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Federal Food, Drug , and Cosmetic Act, for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g, AADA 64-118.

We are proposing the following changes in our application:

1) Since the original submission of the application, Paddock Laboratories, Inc. has built a new manufacturing facility. Upon approval of this application, we plan manufacture NYSTOP™ (Nystatin Topical Powder USP) in the new facility.

   Facility Address at the time of the original submission

   Paddock Laboratories, Inc.
   3101 Louisiana Avenue North
   Minneapolis, MN 55427

   New (now current) Facility Address

   Paddock Laboratories, Inc.
   3940 Quebec Avenue North
   Minneapolis, MN 55427

2) The Master Formula has been revised. We have decreased the amount of Nystatin from [redacted]

3) We are changing the immediate package by using a new cap, [redacted], and bottle. This is not a change in the type of container/closure system. This is a change in the package components.

4) The batch record has been revised to reflect the following:

   a) revision in Master Formula
   b) revision in immediate package components
   c) clarification of components used for the [redacted] in-process drug product
   d) minor revisions in performance of manufacturing steps

5) For future lots, the product label and the insert will be combined on a Fix-a-Form label. The label and insert will now be one unit: a label with an insert attached to it.

Further detail and supporting data and information are contained in the sections attached. Please call if you have any questions or need additional information.

Review and archival copies are included in this submission. A third copy has been sent to the Minneapolis District Office (field copy).

Paddock Laboratories, Inc., does hereby certify that the submitted field copy is a true copy of the technical section of this application [21 CFR 314.94(d)(5)].

Sincerely,

Carol Anding

Carol Anding
Regulatory Affairs Manager
Paddock Laboratories, Inc.

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

Paddock
Laboratories, Inc.

Pharmaceuticals for Medicine, Pharmacy and Science

NDA ORIG AMENDMENT
N/Am FPL

February 16, 1996

RECEIVED
FEB 20 1996
GENERIC DRUGS

Office of Generic Drugs
Center for Drug Evaluation and Research
Food and Drug Administration
Metro Park North II, HFD-600
7500 Standish Place, Room 150
Rockville, MD 20855-2773

Re: Minor Amendment to AADA 64-118
in Response to Deficiency Letter dated May 22, 1995, for
NYSTOP ™ (Nystatin Topical Powder USP), 100,000 units/g

Dear Staff:

Please accept this letter in response to the Agency's deficiency letter of May 22, 1995, regarding our abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Federal Food, Drug, and Cosmetic Act, for NYSTOP ™ (Nystatin Topical Powder USP), 100,000 units/g, AADA 64-118.

We respond to the specific deficiencies (deficiency in bold print, response in non-bold print) as follows:

A. Chemistry Deficiencies

1. **Please submit the following information in reference to degradant testing in the stability program:**

   a. **The complete [redacted] method. The method as submitted is incomplete (see Sample Preparation).**

   The complete method, including sample preparation, is enclosed. See Method 72-001341, "[redacted] Analysis, Nystatin Topical Powder" (Attachment 1).

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

Redacted 2

pages of trade secret and/or

confidential

commercial

information

B. Labeling Deficiencies

GENERAL COMMENTS:

We acknowledge your comment regarding your proposed proprietary name. We find your proprietary name "NYSTOP" acceptable.

Acknowledged.

Container: 15 gram

Satisfactory, however please ensure the readability of the information in the darkened box.

The information in the darkened box is readable as demonstrated in the FPL submitted in this amendment.

Insert:

Combine paragraphs 2 and 3 in the DOSAGE AND ADMINISTRATION section.

Paragraphs 2 and 3 have been combined in the DOSAGE AND ADMINISTRATION section as demonstrated in the FPL submitted in this amendment.

Please revise your insert labeling, then prepare and submit final printed labels and labeling.

Attachment 5 contains twelve (12) copies of FPL (inserts and product labels).

Within the next week, we will be submitting an amendment to this application involving a change in manufacturing site and immediate packaging. We understand that this will be considered a major amendment and that the application will not be approved until review of that amendment is complete. We wish to assure that the minor amendment being submitted today in response to the deficiency letter will be reviewed within the appropriate time period for a minor amendment and not held for review in conjunction with the major amendment coming next week. It is important to us to know as soon as possible if you have any further requirements regarding the minor amendment.

Review and archival copies are included in this submission. A third copy has been sent to the Minneapolis District Office (field copy).

Paddock Laboratories, Inc., does hereby certify that the submitted field copy is a true copy of the technical section of this application [21 CFR 314.94(d)(5)].

Please call if you have any questions or need further information.

Sincerely,

Carol Anding

Carol Anding
Regulatory Affairs Manager
Paddock Laboratories, Inc.

Paddock
Laboratories, Inc.

Pharmaceuticals for Medicine, Pharmacy and Science

AADA 64-118

NEW CORRESP
NC

August 22, 1995

Noted.
NAR /S/ 8/31/95

(see Tr conf 7/5 - appears applicant will also need to submit data for a new batch made at new site)

Office of Generic Drugs
Document Control Room
Metro Park North II
7500 Standish Place Room 150
Rockville, Maryland 20855-2773

Please accept this letter in response to the Agency's deficiency letter of May 22, 1995 regarding our abbreviated antibiotic application dated December 27, 1993 submitted pursuant to Section 507 of the Federal Food, Drug , and Cosmetic Act, for NYSTOP ™ (Nystatin Topical Powder USP), 100,000 units/g, AADA 64-118.

We are working on our [redacted] method, and will be responding to all Chemistry Deficiencies related to the method and degradant limits as requested in the May 22 letter.

We have already corrected our container labels and labeling, as requested in the May 22 letter and will supply 12 copies FPL with our response to the chemistry deficiencies.

We plan to submit our response to the May 22, 1995 deficiency letter in the next few months.

Sincerely,

Mary Beth Erstad

Mary Beth G. Erstad
New Product Development Manager

RECEIVED
AUG 28 1995
GENERIC DRUGS

cc: Sharon Thoma, Minneapolis District

/S/ 8-30-95

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

AADA 64-118

Paddock Laboratories, Inc.
Attention: Mary Beth G. Erstad
3940 Quebec Avenue North
Minneapolis, MN 55427

MAY 22 1995

Dear Madam:

This is in reference to your abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Federal Food, Drug, and Cosmetic Act, for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g.

Reference is also made to your amendment dated February 3, 1995.

The application is deficient and, therefore, not approvable under Section 507 of the Act for the following reasons:

A. Chemistry Deficiencies

1. Please submit the following information in reference to degradant testing in the stability program:

   a. The complete [redacted] method. The method as submitted is incomplete (see **Sample Preparation**).

   b. Validation data for the [redacted] method.

   c. [redacted] labeled to show degradants.

   d. Test data from at least one exhibit lot.

2. The proposed limit for degradants of NMT [redacted] appears to be high. The limits for degradants should be established for individual and total degradants based upon accrued data.

B. Labeling Deficiencies

GENERAL COMMENTS:

We acknowledge your comment regarding your proposed proprietary name. We find your proprietary name "NYSTOP" acceptable.

Container: 15 gram

Satisfactory, however please ensure the readability of the information in the darkened box.

Insert:

Combine paragraphs 2 and 3 in the DOSAGE AND ADMINISTRATION section.

Please revise your insert labeling, then prepare and submit final printed labels and labeling.

The file on this application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw the application. Your amendment should respond to all the deficiencies listed. A partial reply will not be considered for review, nor will the review clock be reactivated until all deficiencies have been addressed. The response to this letter will be considered a MINOR amendment and should be so designated in your cover letter. If you have substantial disagreement with our reasons for not approving this application, you may request an opportunity for a hearing.

Sincerely yours,

/S/ for

Florence S. Fang
Acting Director
Division of Chemistry II
Office of Generic Drugs
Center for Drug Evaluation and Research

APPEARS THIS WAY
ON ORIGINAL

AADA 64-118

Paddock Laboratories, Inc.
Attention: Mary Beth G. Erstad
3940 Quebec Avenue North
Minneapolis, MN 55427

MAY 22 1995

Dear Madam:

This is in reference to your abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Federal Food, Drug, and Cosmetic Act, for NYSTOP™ (Nystatin Topical Powder USP), 100,000 units/g.

Reference is also made to your amendment dated February 3, 1995.

The application is deficient and, therefore, not approvable under Section 507 of the Act for the following reasons:

A. Chemistry Deficiencies

1. Please submit the following information in reference to degradant testing in the stability program:

   a. The complete [redacted] method. The method as submitted is incomplete (see **Sample Preparation**).

   b. Validation data for the [redacted] method.

   c. [redacted] labeled to show degradants.

   d. Test data from at least one exhibit lot.

2. The proposed limit for degradants of NMT [redacted] appears to be high. The limits for degradants should be established for individual and total degradants based upon accrued data.

B. Labeling Deficiencies

GENERAL COMMENTS:

We acknowledge your comment regarding your proposed proprietary name. We find your proprietary name "NYSTOP" acceptable.

Container: 15 gram

Satisfactory, however please ensure the readability of the information in the darkened box.

Insert:

Combine paragraphs 2 and 3 in the DOSAGE AND ADMINISTRATION section.

Please revise your insert labeling, then prepare and submit final printed labels and labeling.

The file on this application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw the application. Your amendment should respond to all the deficiencies listed. A partial reply will not be considered for review, nor will the review clock be reactivated until all deficiencies have been addressed. The response to this letter will be considered a MINOR amendment and should be so designated in your cover letter. If you have substantial disagreement with our reasons for not approving this application, you may request an opportunity for a hearing.

Sincerely yours,

/S/ for 5/19/95

Florence S. Fang
Acting Director
Division of Chemistry II
Office of Generic Drugs
Center for Drug Evaluation and Research

APPEARS THIS WAY
ON ORIGINAL

Paddock Laboratories, Inc.

Note to Labeling
To Labeling Chem Review in turn
/S/ 3/6/95

Pharmaceuticals for Medicine, Pharmacy and Science

February 3, 1995

AMENDMENT Draft Labels
N/AC

Division of Generic Drugs
Document Control Room
CDER, FDA
MPN II, HFD-600
7500 Standish Place
Room 150
Rockville, Maryland 20855-2773

RECEIVED
FEB 13 1995
GENERIC DRUGS

ABBREVIATED ANTIBIOTIC DRUG APPLICATION 64-118

Division of Generic Drugs:

In response to the deficiency letter from your agency dated June 28, 1994, we respectfully submit the following MAJOR AMENDMENT to our pending AADA 64-118, Nystatin Topical Powder USP. This amendment is submitted under 21 CFR 314.60.

Included in this major amendment is a complete response to each point described in the agency's letter of June 28, 1994; along with the following new information:

1) The proposed production size batch has been changed to [redacted] This is a [redacted] times scale-up from the demonstrated batch. The proposed Master Control Record is included.

2) The equipment to be used for mixing the production sized batches is a [redacted] Equipment blueprints are included.

3) We have chosen the tradename "Nystop"™ as the proposed name for our Nystatin Topical Powder USP. This change is included in the draft labels and insert (4 copies).

We have elected to submit draft labeling rather than FPL in order to give the Agency opportunity to comment on our proposed product name.

/S/ 3398

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

Review and archive copies are included in this submission. A third copy has been sent to the Minneapolis District Office (field copy).

Paddock Laboratories, Inc. does hereby certify that the submitted field copy is a true copy of the technical section of the application [21 CFR 314.94 (d)(5)].

Mary Beth Erstad 2/3/95
Signature date

If you are in need of any further assistance, please contact myself or Carol Anding, Regulatory Affairs.

Sincerely,

Mary Beth G. Erstad
New Product Development Manager

3940 Quebec Avenue North, Minneapolis, MN 55427 • 612.546.4676 • FAX: 612.546.4842 • 800.328.5113

PADDOCK
LABORATORIES, INC.
Pharmaceuticals for Medicine, Pharmacy and Science

Norfolk
NAF |S| 7/20/94

NEW CORRESP

July 6, 1994

Division of Generic Drugs
Document Control Room
CDER, FDA
MPN II, HFD-600
7500 Standish Place
Room 150
Rockville, Maryland 20855-2773

ABBREVIATED ANTIBIOTIC DRUG APPLICATION 64-118

Division of Generic Drugs:

We are in receipt of the Agency's deficiency letter dated June 28, 1994 regarding our abbreviated antibiotic application 64-118 for Nystatin Topical Powder USP, 100,000 units/g.

We will be submitting a MAJOR AMENDMENT to our application at the earliest possible time. We are in the process of gathering information and preparing our amendment.

A second copy of this letter is enclosed for your convenience. A third copy has been sent to the Minneapolis District Office (field).

If you are in need of any further assistance, please contact myself or Bruce Paddock.

Sincerely,

Mary Beth G. Erstad

Mary Beth G. Erstad
New Product Development Manager

cc: Review copy
District copy
Sponsor copy

RECEIVED
JUL 11 1994
GENERIC DRUGS

ORIGINAL

3101 Louisiana Ave. No., P.O. Box 27286, Minneapolis, Minnesota 55427 • Telephone (612) 546-4676 • FAX (612) 546-4[illegible]

AADA 64-118

Paddock Laboratories, Inc.
Attention: Mary Beth G. Erstad
3101 Louisiana Avenue North
P.O. Box 27286
Minneapolis, MN 55427

JUN 28 1994

Dear Madam:

This is in reference to your abbreviated antibiotic application dated December 27, 1993, submitted pursuant to Section 507 of the Food, Drug, and Cosmetic Act, for Nystatin Topical Powder USP, 100,000 units/g.

The application is deficient and, therefore, not approvable under Section 507 of the Act for the following reasons:

A. Chemistry Deficiencies

1. [redacted]

2. While neither the CFR nor the USP monographs for "Nystatin Topical Powder" require a test for pH, we recommend you consider establishing a test method and a specification for determining the pH of your product. The pH should also be monitored throughout the stability studies of the product.

3. The assay procedure designated for use in your stability studies is not stability indicating. A stability indicating method should be used. Degradation products should be monitored and limits set.

B. Labeling Deficiencies

Container:

Relocate the units per gram statement so that it follows the established name and increase its prominence. In addition, the net quantity should be moved and made less prominent.

Insert:

DOSAGE AND ADMINISTRATION

Add the following as the final sentence:

The cream is usually preferred to the ointment in candidiasis involving intertriginous areas; very moist lesions, however, are best treated with topical dusting powder.

Please revise your container labels and package insert labeling, then prepare and submit final printed labels and labeling.

The file on this application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw the application. Your amendment should respond to all the deficiencies listed. A partial reply will not be considered for review, nor will the review clock be reactivated until all deficiencies have been addressed. Your response to this letter will be considered a MAJOR amendment and should be so designated in your cover letter. If you have substantial disagreement with our reasons for not approving this application, you may request an opportunity for a hearing.

Sincerely yours,

/S/ 6/28/94

C. Greg Guyer, Ph.D.
Director
Division of Chemistry II
Office of Generic Drugs
Center for Drug Evaluation and Research

AADA 64-118

FEB 2 8 1994

Paddock Laboratories, Inc.
Attention: Mary Beth G. Erstad
3101 Louisiana Avenue North
P.O. Box 27286
Minneapolis, MN 55427

Dear Madam:

We acknowledge the receipt of your abbreviated antibiotic application submitted pursuant to Section 507 of the Federal Food, Drug and Cosmetic Act for the following:

NAME OF DRUG: Nystatin Topical Powder USP, 100,000 units/g.

DATE OF APPLICATION: December 27, 1993

DATE OF RECEIPT: December 29, 1993

DATE ACCEPTABLE FOR FILING: February 23, 1994

We will correspond with you further after we have completed the review of your application.

Please be advised that during the AADA approval process, samples of the active and inactive ingredients, and the AADA exhibit batch(es) (which should be the same as the biobatch if a bioequivalence study was conducted) may be collected by the FDA district office staff and tested by FDA district or headquarters laboratory staff. Drug substance standards and manufacturer's documentation of the impurity profile should be made available. In addition, batch records, certificates of analysis and specifications and tests for the drug substance, drug product and inactive ingredients may be collected.

Please refer to the Office of Generic Drugs, Policy and Procedure Guide # 35-92 for the number of batches and the batch size requirements for AADA's submitted for the drug substance and drug product.

The subject product of an AADA must conform to the current official compendial monograph requirements and be compatible with the test and assay methods described in that monograph. You must submit adequate documentation and laboratory data in your AADA that prove that any non-official alternate procedures that you choose to use for the analytical control (release) of your product are equivalent to the official compendial procedures. If this information is not submitted, the review of the application will be delayed.

Please identify any communications concerning this application with the number shown above.

Sincerely yours,

/S/ 2/28/94

Robert W. Pollock
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

cc: AADA#64-118
DUP Jacket
Division File
HFD-82
Field Copy
HFD-600/Reading File
HFD-615/MBennett
HFD-473/JGraham

Endorsements: HFD-615/Gordon Johnston, Chief /S/ 2/28/94 date
HFD-615/PRickman, CSO /S/ /date/ 2/25/94
HFD-615/WRussell, CSO /date/ / /
HFD-643/JHarrison, /S/ 2/28/94
WP File\russell\64-118
F/T by bcw/2-25-94
AADA ACKNOWLEDGEMENT LETTER!

APPEARS THIS WAY
ON ORIGINAL

PADDOCK
LABORATORIES, INC.
Pharmaceuticals for Medicine, Pharmacy and Science

2/23/94 file 507 1c1

NDA ORIG AREA

N-AC

February 17, 1994

Division of Generic Drugs
Document Control Room
CDER, FDA
MPN II, HFD-600
7500 Standish Place
Room 150
Rockville, Maryland 20855-2773

ABBREVIATED ANTIBIOTIC DRUG APPLICATION 64-118

Division of Generic Drugs:

In response to the refusal to file letter from your agency dated January 28, 1994, we respectfully submit the following additional information.

Enclosed is one review and one archival copy of additional requested information to be added to AADA 64-118 for Nystatin Topical Powder USP. Included are responses to each point listed in the refusal to file letter. A third copy has been sent to the Minneapolis District Office (field).

We have included a certification stating that the submitted field copy is a true copy of the technical section of the application [21 CFR 314.94 (d)(5)].

If you are in need of any further assistance, please contact myself or Bruce Paddock.

Sincerely,

Mary Beth G. Erstad

Mary Beth G. Erstad
New Product Development Manager

cc: Review copy
District copy
Sponsor copy

RECEIVED
FEB 23 1994
GENERIC DRUGS

ORIGINAL

3101 Louisiana Ave. No., P.O. Box 27286, Minneapolis, Minnesota 55427 • Telephone (612) 546-4676 • FAX (612) 546-4842

AADA 64-118

JAN 28 1994

Paddock Laboratories, Inc.
Attention: Mary Beth G. Erstad
3101 Louisiana Avenue North
P.O. Box 27286
Minneapolis, MN 55427

Dear Madam:

Please refer to your Abbreviated Antibiotic Application (AADA) submitted under Section 507 of the Federal Food, Drug and Cosmetic Act for Nystatin Topical Powder USP, 100,000 units/g.

We have given your application a preliminary review, and we find that it is not sufficiently complete to merit a critical technical review.

We are refusing to file this AADA under 21 CFR 314.101(d)(3) for the following reasons:

> You have failed to provide a side-by-side comparison of your proposed labeling (container labels and package insert) with the approved labeling for the reference listed drug with all differences annotated and explained [21 CFR 314.94(a)(8)(iv)].
>
> You have failed to include a signed certification with original signature which contains a list of all relevant convictions, for which a person can be debarred, of the applicant and affiliated persons, including contractors, responsible for the development or submission of the application. Relevant convictions are those for which a person can be debarred as described in section 306 (a) and (b). The list must contain all such convictions that occurred within five years before the date of the application. Firms with no convictions to list should submit a statement to that effect [GDEA Sections 306(k)(1) and (2)].

Thus, it will be not be filed as an abbreviated antibiotic application within the meaning of Section 507 of the Act.

In addition, you have failed to provide an original signature on your Debarment Certification. Please provide a revised certification.

You have proposed to utilize [redacted]. However, you have failed to provide a letter of authorization from [redacted] to that allows [redacted] to act as agent in granting the Agency reference to the abbreviated antibiotic application held by [redacted].

Also, you have failed indicate that a third copy of the technical section was submitted to the field. In addition, you must provide a certification stating that the submitted field copy is a true copy of the technical section of the application [21 CFR 314.94(d)(5)].

Within 30 days of the date of this letter you may amend your application to include the above information or request in writing an informal conference about our refusal to file the application. To file this application over FDA's protest, you must avail yourself of this informal conference.

If after the informal conference, you still do not agree with our conclusion, you may make a written request to file the application over protest, as authorized by 21 CFR 314.101(c). If you do so , the application shall be filed over protest under 21 CFR 314.101(b). The filing date will be 60 days after the date you requested the informal conference. If you have any questions please call:

William Russell, R.Ph.
Consumer Safety Officer
(301) 594-0315

Sincerely yours,

Robert W. Wallock
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

AADA 64-118
cc: DUP /Jacket
DUP/Division File
HFD-82
HFD-File
Field copy
HFD-600/Reading File
HFD-615/MBennett

Endorsements: HFD-615/Gordon Johnston, Chief /S/ 1/28/94 date
HFD-615/PRickman, CSO /S/ date
HFD-615/WRussell,CSO /S/ date
HFD-643/JHarrison/Branch Chief /S/ date 1/28/94
WP File\russell\64-118
F/T bcw/1-28-94
AADA Refuse to File!

DEPARTMENT OF HEALTH AND HUMAN SERVICES PUBLIC HEALTH SERVICE

PADDOCK LABS
3101 LOUISIANA AVE NORTH
MINNEAPOLIS MN 55427

AADA N064118

Dear Sir/Madam:

We acknowledge the receipt of your Abbreviated Antibiotic Drug Application submitted pursuant to Section 507 of the Federal Food, Drug, and Cosmetic Act for the following:

NAME OF DRUG:
NYSTATIN

DATE OF APPLICATION: 27-DEC-93

DATE OF RECEIPT: 29-DEC-93

We will correspond with you further after we have had the opportunity to review the application.

Please identify any communications concerning this application with the number shown above.

Send representative samples, three times the amount needed to perform all compendial (CFR/USP) tests except pyrogens and sterility tests, from three batches along with the respective certificates of analysis and copies of batch records. The exhibit samples should be from batch sizes that are minimally ——— of the maximum production size and manufactured in production equipment. Send the samples to:

FDA/Division of Research and Testing
Attention: Joseph H. Graham, Ph.D. (HFD-473)
Chief, Antimicrobial Drugs Branch
200 C Street, S.W., Room 2002
Washington, D.C. 20204

Send copies of all correspondence regarding the requested samples to the AADA.

We recommend that you send the samples by registered mail/return receipt requested.

Sincerely yours,

/S/

Roger L. Williams, M.D.
Director
Office of Generic Drugs
Center for Drug Evaluation and Research

c
HFD-473 (Dr. Joseph H. Graham)

PADDOCK LABORATORIES, INC.

Pharmaceuticals for Medicine, Pharmacy and Science

Release to file 1/3/94 507

1/3/94

December 27, 1993

Division of Generic Drugs
Document Control Room
CDER, FDA
MPN II, HFD-600
7500 Standish Place
Room 150
Rockville, Maryland 20855-2773

ABBREVIATED ANTIBIOTIC DRUG APPLICATION

Division of Generic Drugs:

Enclosed is one review and one archival copy of an Abbreviated Antibiotic Drug Application (AADA) for Nystatin Topical Powder USP. We are submitting this application under CFR 314.92(a)(2). The originator product is Mycostatin Topical Powder by Westwood-Squibb Pharmaceuticals. Each copy consists of two (2) volumes.

We propose to [redacted] Nystatin Topical Powder USP using drug substance from either of [redacted]

We have included in this application two stability batches; one [redacted] containing the [redacted] material, and one containing the [redacted] material. Authorization to reference Drug Master Files for both [redacted] are also included.

The Content and Format of this application is modeled after the recommendations in the *Office of Generic Drugs Policy and Procedure Guide #30-91 April 10, 1991* *Organization of an Abbreviated New Drug Application and Abbreviated Antibiotic Application.*

If you are in need of any further assistance, please contact myself or Bruce Paddock.

Sincerely,

Mary Beth G. Erstad

Mary Beth G. Erstad
New Product Development Manager

RECEIVED
DEC 29 1993
GENERIC DRUGS

3101 Louisiana Ave. No., P.O. Box 27286, Minneapolis, Minnesota 55427 • Telephone (612) 546-4676 • FAX (612) 546-4842