Approval Package for:

APPLICATION NUMBER:
NDA 19-732/S-016

Name: Lupron Depot
leuprolide acetate (7.5 mg)

Sponsor: TAP Pharmaceuticals, Inc.

Approval Date: January 26, 1989
APPLICATION NUMBER:
NDA 19-732/S-016

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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 19-732/S-016

APPROVAL LETTER
TAP Holdings, Inc.
Attention: Aruna Dabholkar, M.D.
Associate Director, Regulatory Affairs
2355 Waukegan Road
Deerfield, IL 60015

Dear Dr. Dabholkar:


We acknowledge receipt of your submissions dated June 21, 1999 and July 9, 1999.

These supplemental new drug applications provide for a new manufacturing site for the prefilled dual chamber syringe.

We have completed the review of these supplemental applications and they are approved.

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, contact Jennifer Mercier, Regulatory Project Manager, at (301) 827-4260.

Sincerely,

Moo-Jhong Rhee, Ph.D.
Chemistry Team Leader, for the
Division of Reproductive and Urologic Drug Products,
(HFD-580)
DNDC II, Office of New Drug Chemistry
Center for Drug Evaluation and Research

AUG 13 1999

[Signature]

8/13/99
HFD-580/Div. Files
HFD-580/J.Mercier
HFD-580/Raraick/Mann/Rhee/De
HFD-160/Cooney/Vincent
HFD-094/DDMS (with labeling)
HFD-820/DNDC Division Director
DISTRICT OFFICE

Drafted by: JM/August 13, 1999
final: August 13, 1999

APPROVAL (AP)
TAP Holdings, Inc.
Attention: Aruna Dabholkar, M.D.
Associate Director, Regulatory Affairs
2355 Waukegan Road
Deerfield, IL 60015

Dear Dr. Dabholkar:


We acknowledge receipt of your faxed submission dated June 21, 1999.

These supplements propose a new manufacturing site for manufacturing the prefilled dual chamber syringe.

We have completed the review of these applications, as amended, and they are approvable. Before these applications may be approved, however, it will be necessary for you to address the following:

1. 

2. 

3. 
Redacted ___ page(s)
of trade secret and/or
confidential commercial
information from

_Approvable Letter
(5-016)
Within 10 days after the date of this letter, you are required to amend the supplemental applications, notify us of your intent to file amendments, or follow one of your other options under 21 CFR 314.110. In the absence of any such action FDA may proceed to withdraw the applications. Any amendment should respond to all the deficiencies listed. We will not process a partial reply as a major amendment nor will the review clock be reactivated until all deficiencies have been addressed.

These products may be considered to be misbranded under the Federal Food, Drug, and Cosmetic Act if they are marketed with these changes prior to approval of these supplemental applications.

If you have any questions, contact Jennifer Mercier, Project Manager, at (301) 827-4260.

Sincerely,

Lisa Rarick, M.D.
Director
Division of Reproductive and Urologic Drug Products,
(HFD-580)
Office of Drug Evaluation III
Center for Drug Evaluation and Research
cc:
HFD-580/Div. Files
HFD-580/J.Mercier/Rumble
HFD-580/Rarick/Mann/Rhee/De
HFD-95/DDMS
DISTRICT OFFICE

Drafted by: JM/June 25, 1999
final: June 25, 1999
filename:

APPROVABLE (AE)
CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 19-732/S-016

CHEMISTRY REVIEW(S)
6. APPLICANT NAME AND ADDRESS:
TAP Pharmaceuticals Inc.
2355 Waukegan Road
Deerfield, IL-60015

7. NAME OF DRUG: Lupron Depot® 7.5 mg

8. NONPROPRIETARY NAME: leuprolide acetate depot suspension

9. CHEMICAL NAME/STRUCTURE:

10. DOSAGE FORM(S): Sterile Depot Suspension for Injection

11. POTENCY: 7.5 mg

12. PHARMACOLOGICAL CATEGORY: Palliative treatment of advanced prostatic cancer

13. HOW DISPENSED: Intramuscular Injection

14. RECORDS & REPORTS CURRENT: Yes

15. RELATED IND/NDA/DMF: This is part of a bundled supplements. Related applications include the following:
16. PRIOR APPROVAL SUPPLEMENT PROVIDES FOR: New manufacturing site for manufacturing the prefilled dual chamber syringe

17. COMMENTS:
The prefilled dual chamber syringe was approved as a new container closure system in October 1995 (NDA 19-732/S009). The manufacturing was approved at Osaka plant in Japan. The manufacturer, Takeda Chemical Industries submitted this supplement to add an additional site for filling the syringes at Hikari plant. The diluent used to fill in these syringes will be manufactured at the Hikari plant. The active drug will be manufactured at the previously approved sites (Shanan plant and Osaka plant). The syringe components, manufacturing method and the final product specifications and testing methods are the same as approved before. The new plant and the manufacturing process are validated. Three months of accelerated and RT stability has been included in the application for one production lot of each of Lupron Depot 3.75 mg, 7.5 mg, 11.25 mg and 15 mg and the results are satisfactory. Quality of the product manufactured at Hikari plant was compared with the corresponding one manufactured at the approved site, Osaka plant and no significant changes have been observed.
The new facility (Hikari plant) should be inspected according to CFR 314.70 and a request has been forwarded through EES on 28-December-1998. Overall recommendation is found 'acceptable' on 6/15/99 based on an inspection performed on 5-19-99.
Since the diluent will be manufactured at the Hikari plant and it needs to be sterile, the application was also reviewed by a microbiologist (Dr. Carol K. Vincent, HFD-805) and it was found deficient.

18. CONCLUSIONS AND RECOMMENDATIONS:
This application is 'approvable' pending satisfactory resolution of the microbiologist's concerned issues as delineated in the draft letter.

Issue “Approvable” letter

19. REVIEWER NAME
   Swapan K. De, Ph.D.

   SIGNATURE
   [Signature]
   6/15/99

   DATE COMPLETED
   6/15/99

cc:
Orig. NDA #19-732
HFD-580/Division File
HFD-580/Kish
HFD-580/MRhee/SDe

R/D Init by: MJ Rhee, Ph.D.

filename: nda19732.scm016

6/16/99
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information from

Chemistry Review #1
(S-016)
Application: NDA 19732/016
Stamp: 28-DEC-1998
Regulatory Due: 28-APR-1999
Applicant: TAP HOLDINGS
2355 WAUKEGAN RD
DEERFIELD, IL 60015
Priority: 3P
Org Code: 580

Action Goal: District Goal: 24-MAR-1999
Brand Name: LUPRON (LEUPROLIDE ACETATE)
DEPOT INJ
Estab. Name:
Generic Name: LEUPROLIDE ACETATE
Dosage Form: (FOR INJECTION)
Strength: 7.5 MG

Application Comment: SUPPLEMENT PROVIDES FOR NEW MANUFACTURING SITE FOR MANUFACTURING THE PREFILLED DUAL CHAMBER SYRINGE. SAME CHANGES WILL BE APPLICABLE TO NDA19943-SCM010, 20263-SCM012, 20011-SCM016. (on 29-JAN-1999 by S. DE (HFD-580) 301-827-7516)

FDA Contacts: S. DE (HFD-580) 301-827-7516, Review Chemist

Overall Recommendation: ACCEPTABLE on 15-JUN-1999 by M. EGAS (HFD-322) 301-594-0095

Establishment: 9610307
TAKEDA CHEMICAL INDUSTRIES LTD
4720 TAKEDA MITSUI
HIKARI, YAMAGUCHI, JA

DMF No: AADA:
Responsibilities: FINISHED DOSAGE MANUFACTURER
Profile: SVS
OAI Status: NONE

Estab. Comment: TAKEDA CHEMICAL INDUSTRIES PROPOSED THIS NEW SITE TO BE RESPONSIBLE FOR MANUFACTURING THE SYRINGE ASSEMBLY AS WELL AS FILLING THE SYRINGES WITH DRUG PRODUCT FOLLOWING PREVIOUSLY APPROVED PROCEDURE. THE DILUENT USED TO FILL THE SYRINGES WILL ALSO BE MANUFACTURED AT HIKARI PLANT. THE ACTIVE DRUG, LUPRON DEPOT 3.75 MG, 7.5 MG, 11.25 MG AND 15 MG. (on 29-JAN-1999 by S. DE (HFD-580) 301-827-7516)

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1. ORGANIZATION: HFD 580
2. NDA NUMBER: 19-732
3. SUPPLEMENT NUMBERS/DATES: SCM-016
   Letterdate: 12-23-98
   Stampdate: 12-28-98
4. AMENDMENTS/REPORTS/DATES:
   Letterdate: 6-21-99 [fax]; 7/9/99
   Stampdate: 7-12-99
5. RECEIVED BY CHEMIST: 1-3-99/6-21-99/7-14-99

6. APPLICANT NAME AND ADDRESS:
   TAP Pharmaceuticals Inc.
   2355 Waukegan Road
   Deerfield, IL-60015

7. NAME OF DRUG: Lupron Depot® 7.5 mg

8. NONINFRINGEMENT NAME: leuprolide acetate depot suspension

9. CHEMICAL NAME/STRUCTURE:
   5-Oxo-L-prolyl-L-histidyl-L-tryptophyl-L-seryl-L-tyrosyl-D-leucyl-L-leucyl-L-arginy1-N-ethyl-L-
   prolinamide acetate

10. DOSAGE FORM(S): Sterile Depot Suspension for Injection

11. POTENCY: 7.5 mg

12. PHARMACOLOGICAL CATEGORY: Palliative treatment of advanced prostatic cancer

13. HOW DISPENSED: Intramuscular Injection

14. RECORDS & REPORTS CURRENT: Yes
15. RELATED IND/NDA/DMF: This is part of a bundled supplements. Related applications include the following:

NDA 20263-scm012
NDA 20011-scm016
NDA 19943-scm010
NDA 20517-scm006
NDA 20708-scm006

16. PRIOR APPROVAL SUPPLEMENT PROVIDES FOR: New manufacturing site for manufacturing the prefilled dual chamber syringe

17. COMMENTS:
The amendment sent by the sponsor on 07-July-1999 was the response of the "approvable" letter from the Agency (send to the sponsor on 25 June-1999). The response is found satisfactory (see attached review) as reviewed by the microbiologist (Dr. Carol K. Vincent, HFD-805).

18. CONCLUSIONS AND RECOMMENDATIONS:
Based on the information provided by the firm and the microbiologist's recommendation, this supplement may be approved.

Issue "Approval" letter

19. REVIEWER NAME
Swapan K. De, Ph.D.

SIGNATURE
Swapan K. De
8/12/99

DATE COMPLETED
8/12/99

cc:
Orig. NDA #19-732
HFD-580/Division File
HFD-580/Mercierj
HFD-580/MRhee/SDe

R/D Init by: MJ Rhee, Ph.D.

filename: nda19732.scm016a2
CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 19-732/S-016

MICROBIOLOGY REVIEW(S)
MICROBIOLOGIST'S REVIEW OF SUPPLEMENT FOR
DIVISION OF REPRODUCTIVE AND UROLGIC DRUG PRODUCTS, HFD-580
OFFICE OF NEW DRUG CHEMISTRY, MICROBIOLOGY STAFF, HFD-805
FEBRUARY 11, 1999

Reviewing Microbiologist: Carol K. Vincent, HFD-805

NDA / Supplement Number: NDA 19-732 / SCM-016
NDA 20-517 / SCM-006

NB: These supplements are reviewed in tandem.

Drug Product: Lupron Depot® 7.5mg [leuprolide acetate depot suspension]
Lupron Depot® -3 month 22.5mg and -4 month 30mg [leuprolide acetate depot suspension]

NDA 19-732 / SCM-016
NDA 20-517 / SCM-006

Received for Review: January 4, 1999

COMIS User Fee Goal Date: April 28, 1999

COMIS User Fee Due Date: June 26, 1999

Applicant: TAP Pharmaceuticals Inc.
Bannockburn Lake Office Plaza
2355 Waukegan Road
Deerfield, IL 60015

Manufacturer and Site: Takeda Chemical Industries
4720 Mitsui Aza Takeda
Hikari, Yamaguchi 743-8502
Japan

Supplement Provides For: New manufacturing site in Hikari, Japan for the manufacture of the prefilled dual chamber syringe.

Dosage Form / Route of Administration: Pre-filled syringe; for injection. Sterile diluent to be mixed with dry drug product powder at point of use.

Conclusions and Recommendations: We do not recommend approval of the supplements because inadequate sterilization process validation information for a new manufacturing location has been provided.

See Review Notes, below.

cc:
NDA 19-732 / SCM-016
NDA 20-517 / SCM-006
HFD-580/CKish
HFD-160/Consult file/CKVincent [HFD-805]
Drafted by: CKVincent/01-29-99

Carol K. Vincent, HFD-805
2-11-99

[Signature]

FEB 23 1999
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Microbiology Review #1
(S-016)
MICROBIOLOGIST'S REVIEW NO. 2 OF SUPPLEMENT FOR
DIVISION OF REPRODUCTIVE AND UROLOGIC DRUG PRODUCTS, HFD-580
OFFICE OF NEW DRUG CHEMISTRY, MICROBiology STAFF, HFD-805

JUNE 23, 1999

Reviewing Microbiologist: Carol K. Vincent, HFD-805

NDA / Supplement Number:
NDA 19-732 / SCM-016
NDA 19-943 / SCM-010
NDA 20-011 / SCM-016
NDA 20-263 / SCM-012
NDA 20-517 / SCM-006
NDA 20-708 / SCM-006

Drug Product: Lupron Depot® [leuprolide acetate depot suspension]

Document Date: December 23, 1998

Amendment: June 21, 1999 [fax]

Amendment received for review: June 21, 1999

COMIS User Fee Due Date: June 26, 1999  COMIS User Fee Goal Date: April 28, 1999

Name and Address of Applicant: TAP Pharmaceuticals, Inc.
Bannockburn Lake Office Plaza
2355 Waukegan Road
Deerfield, IL 60015

Name and Address of Manufacturer:
Takeda Chemical Industries
4720 Mitsui Aza Takeda
Hikari, Yamaguchi 743-8502
Japan

Supplement Provides For: New manufacturing site in Hakari, Japan for the manufacture of the prefilled dual chamber syringe.

Dosage Form: Pre-filled syringe for injection. Sterile diluent to be mixed with dry drug product powder at point of use.

Conclusions and Recommendations: The subject supplements are approvable pending satisfactory review of sterilization process validation information requested herein. See E:

Review Notes: below.

cc:
NDA 19-732 / SCM-016
NDA 19-943 / SCM-010
NDA 20-011 / SCM-016
NDA 20-263 / SCM-012
NDA 20-517 / SCM-006
NDA 20-708 / SCM-006
HFD-580/Rarick/MRhee/SDe/LPauls/JMercier
HFD-160/Consult file/CKVincent [HFD-805]
Drafted by: CKVincent/06-22-99

C:\CKV99\NDA19732.016

Carol K. Vincent, HFD-805

06-23-99

FAE 6/24/99
Redacted 8 page(s) of trade secret and/or confidential commercial information from Microbiology Review #2 (S-016)
MICROBIOLOGIST'S REVIEW NO. 3 OF SUPPLEMENT FOR
DIVISION OF REPRODUCTIVE AND UROLOGIC DRUG PRODUCTS, HFD-580
OFFICE OF NEW DRUG CHEMISTRY, MICROBIOLOGY STAFF, HFD-805

AUGUST 11, 1999

Reviewing Microbiologist: Carol K. Vincent, HFD-805

NDA / Supplement Number:
NDA 19-732 / SCM-016
NDA 19-943 / SCM-010
NDA 20-011 / SCM-016
NDA 20-263 / SCM-012
NDA 20-517 / SCM-006
NDA 20-708 / SCM-006

Drug Product: Lupron Depot® [leuprolide acetate depot suspension]

Document Date: July 9, 1999

Received for review: June 16, 1999

COMIS User Fee Due Date: August 25, 26, 1999

Name and Address of Applicant: Name and Address of Manufacturer:
TAP Pharmaceuticals, Inc. Takeda Chemical Industries
Bannockburn Lake Office Plaza 4720 Mitsui Aza Takeda
2355 Waukegan Road Hikari, Yamaguchi 743-8502
Deerfield, IL 60015 Japan

Supplement Provides For: New manufacturing site in Hakari, Japan for the manufacture of the prefilled
dual chamber syringe.

Dosage Form: Pre-filled syringe for injection. Sterile diluent to be mixed with dry drug product powder at point
of use.

Conclusions and Recommendations: We recommend approval for the subject supplements.

See E: Review Notes: below.

cc:
NDA 19-732 / SCM-016
NDA 19-943 / SCM-010
NDA 20-011 / SCM-016
NDA 20-263 / SCM-012
NDA 20-517 / SCM-006
NDA 20-708 / SCM-006
HFD-580/Rarick/MRhee/SDe/LPauls/IMercier
HFD-160/Consult file/CKVincent [HFD-805]
Drafted by: CKVincent/08-03-99

Carol K. Vincent, HFD-805 8-11-99

[Signature] 8/12/99
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confidential commercial

information from

Microbiology Review #3
(S-016)
CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 19-732/S-016

CORRESPONDENCE
July 9, 1999

Lisa M. Rarick, MD
Director, Division of Reproductive and Urologic
Drug Products (HFD-580)
Attn: Central Document Room 17 B-20
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

RE: NDA 19-732/S-016
Lupron Depot® 7.5 mg
(leuprolide acetate for depot suspension)
Amendment to Supplemental Application for New
Manufacturing Site (Hikari Plant) for Pre-Filled Dual
Chamber Syringe

Dear Dr. Rarick:


The field copy of this amendment is being submitted to the Division. In accordance with 21 CFR 314.5(K)(3), TAP Holdings Inc. certifies that the field copy is a true copy of the information submitted in this amendment to the supplemental application.

Following are the comments from the approvable letter and the responses of TAP Holdings Inc. to those comments:

1. [Blank]
Redacted 3 page(s) of trade secret and/or confidential commercial information from

Correspondence (Amendment to Suppl. (S-016) Application)
Please do not hesitate to contact me at 847-317-5780 if you have any questions.

Sincerely,

[Signature]

Dean Sundberg
Director, Regulatory Affairs
June 21, 1999

Division of Reproductive and Urologic Drug Products, HFD-580
Document Control Room 17B-20
Center for Drug Evaluation & Research
Food and Drug Administration
5800 Fishers Lane
Rockville, MD 20857

RE: Lupron Depot® 7.5mg (leuprolide acetate depot suspension)

NDA 19-732, S-016
Amendment No. 001

Dear Dr. Rarick,

The sponsor, TAP Holdings Inc., submits this Amendment to the supplemental Application under the provisions of Section 505(i) of the Federal Food, Drug and Cosmetic Act and 21 CFR 314.60 (a).

This amendment includes the data requested by the microbiology reviewer, communicated to the sponsor via a draft letter on June 16, 1999.

Attached is the information required for this amendment.

Sincerely,

Aruna Dabholkar, M.D.
Associate Director, Regulatory Affairs
(847) 317-4893 phone
(847) 317-5795 fax

ADimea

Attachments
NDA 19-732/S-016

Tap Holdings, Inc.
2355 Waukegan Road
Deerfield, IL 60015

Attention: Aruna Dabholkar, M.D.
Associate Director, Regulatory Affairs

Dear Dr. Dabholkar:

We acknowledge receipt of your supplemental application for the following:

Name of Drug: Lupron Depot® 7.5mg (leuprolide acetate depot suspension)
NDA Number: 19-732
Supplement Number: S-016
Date of Supplement: December 23, 1998
Date of Receipt: December 28, 1998

Unless we find the application not acceptable for filing, this application will be filed under Section 505(b)(1) of the Act on February 26, 1999, in accordance with 21 CFR 314.101(a).

All communications concerning this NDA should be addressed as follows:

Center for Drug Evaluation and Research
Division of Reproductive and Urologic Drug Products, HFD-580
Office of Drug Evaluation II
Attention: Document Control Room 17B-20
5600 Fishers Lane
Rockville, MD 20857

Sincerely,

[Signature]

Jane Paule
Chief, Project Management Staff
Division of Reproductive and Urologic Drug Products, HFD-580
Office of Drug Evaluation II
Center for Drug Evaluation and Research
cc:
Original NDA 19-732/S-016
HFD-580/Div. Files
HFD-580/CSO/C. Kish

SUPPLEMENT ACKNOWLEDGEMENT
December 23, 1998

Division of Reproductive and Urologic Products, HFD-580
Document Control Room 17B-20
Center for Drug Evaluation and Research
Food and Drug Administration
5600 Fishers Lane
Rockville, MD 20857

RE:  **Lupron Depot® 7.5mg**

*(leuprolide acetate depot suspension)*

NDA 19-732
Supplemental Application for new manufacturing site for manufacturing the prefilled dual chamber syringe

Dear Dr. Rarick,

The sponsor, TAP Pharmaceuticals Inc., submits this supplemental Application under the provisions of Section 505(i) of the Federal Food, Drug and Cosmetic Act and 21 CFR 314.70 (b) (2) (vi) and (viii).

This supplement requests for approval of a new manufacturing site for the manufacturing of the prefilled dual chamber syringe.

This supplement consists of 2 volumes labeled as Volume 1.1 and 1.2. The volume 1.1 contains required manufacturing and controls information. Volume 1.2 contains information for Facilities and Process Validations. Three copies of each Volume 1.1 and 1.2 are submitted.

Since the new site is in Japan, the field copy of this application is submitted to the Division. Pursuant to 21 CFR 314.5 (K) (3) we certify that the field copy is the true copy of the manufacturing and controls information submitted in this supplemental application.

Attached is the information required for this supplement:

Sincerely,

Aruna Dabholkar, M.D.
Associate Director, Regulatory Affairs
(847) 317-4893 phone
(847) 317-5795 fax

AD/mea
Attachment