DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

WRITTEN REQUEST – AMENDMENT #1

IND 65,850 N240

Johnson & Johnson Pharmaceutical Research & Development, L.L.C.
Attention: Lori Birkenberger, PhD, Director, Regulatory Affairs
920 U.S. Highway 202
P.O. Box 300
Raritan, NJ 08869-0602

Dear Dr. Birkenberger:

Please refer to your correspondence dated March 29, 2007, requesting changes to FDA's November 2, 2006 Written Request for pediatric studies for Invega (paliperidone) ER Tablets.

We have reviewed your proposed changes and are amending the below-listed sections of the Written Request. All other terms stated in our Written Request issued on November 2, 2006 remain the same.

Specific Study Requirements for Development Program in Adolescent Schizophrenia

Study Design

Pediatric Pharmacokinetic Study

Current WR text:

- You must obtain pharmacokinetic data to provide information pertinent to dosing of the study drug in the relevant pediatric population. These data could come from traditional pharmacokinetic studies, or alternatively, from population kinetic approaches applied to preliminary efficacy trials or to other safety trials. You must perform tolerability studies (in which kinetic data can be obtained) to fully explore the range of tolerated doses, before conducting the definitive pharmacokinetic study and before conducting the definitive efficacy and safety studies. You should be aware that a guidance document on population pharmacokinetic studies is available under [www.fda.gov/cder/guidance/18523fnl.pdf].

Amended WR text:

- You must obtain pharmacokinetic data to provide information pertinent to dosing of the study drug in the relevant pediatric population. These data could come from traditional pharmacokinetic studies, or alternatively, from population kinetic approaches applied to efficacy trials or to other safety trials. You must perform a study (in which kinetic data can be obtained) to explore the range of tolerated doses, before conducting the definitive efficacy and safety studies. You should be aware that a guidance document on population pharmacokinetic studies is available under [www.fda.gov/cder/guidance/18523fnl.pdf].

GENERAL REQUIREMENTS AND COMMENTS

Timeframe for submitting reports of the study(ies)

Current WR Text:
Reports of the above studies must be submitted to the Agency within 3 years from the date of this letter to be eligible to qualify for pediatric exclusivity extension under Section 505A of the Act. Please keep in mind that pediatric exclusivity attached only to existing patent protection that has not expired at the time you submit your reports of the studies in response to this Written Request.

Amended WR Text:
Reports of the above studies must be submitted to the Agency within 5 years from the date of this letter to be eligible to qualify for pediatric exclusivity extension under Section 505A of the Act. Please keep in mind that pediatric exclusivity attached only to existing patent protection that has not expired at the time you submit your reports of the studies in response to this Written Request.

We also note your request to change the Postmarketing Commitment cited in the December 19, 2006 approval letter for Invega (paliperidone) ER Tablets, requiring submission of the final pediatric study reports to NDA 21-999 by December 2009, be revised to November 2, 2011. We agree with this revision and will make the appropriate administrative change.

Reports of the studies that meet the terms of the Written Request dated November 2, 2006, as amended by this letter, must be submitted to the Agency on or before November 2, 2011, in order to possibly qualify for pediatric exclusivity extension under Section 505A of the Act.

Submit reports of the studies as a supplement to an approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, clearly mark your submission **"SUBMISSION OF PEDIATRIC STUDY REPORTS – PEDIATRIC EXCLUSIVITY DETERMINATION REQUESTED"** in large font, bolded type at the beginning of the cover letter of the submission and include a copy of this letter.

If you wish to discuss any amendments to this Written Request, submit proposed changes and the reasons for the proposed changes to your application. Clearly mark submissions of proposed changes to this request **"PROPOSED CHANGES IN WRITTEN REQUEST FOR PEDIATRIC STUDIES"** in large font, bolded type at the beginning of the cover letter of the submission. We will notify you in writing if we agree to any changes to this Written Request.

We hope you will fulfill this pediatric study request. We look forward to working with you on this matter in order to develop additional pediatric information that may produce health benefits to the pediatric population.

If you have any questions, call Keith Kiedrow, PharmD, Regulatory Project Manager, at (301) 796-1924.

Sincerely,

{See appended electronic signature page}

Robert Temple, M.D.
Director
Office of Drug Evaluation I
Center for Drug Evaluation and Research

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

/s/

Robert Temple

8/29/2007 11:49:45 AM