DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 204592

NDA APPROVAL

Iroko Pharmaceuticals LLC
One Kew Place
15- Rouse Boulevard
Philadelphia, PA 19112

Attention: Steve Jensen
Sr. VP, Regulatory Affairs & Quality

Dear Mr. Jensen:

Please refer to your New Drug Application (NDA) dated and received December 20, 2012, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Zorvolex (diclofenac) Capsules 18 mg and 35 mg.

We acknowledge receipt of your amendments dated January 30, February 4 and 12, March 6, April 8 and 30, August 15, 23, and 30, and October 1 and 10, 2013.

Reference is also made to your email dated Oct. 18, 2013, which included the final agreed-upon labeling.

This new drug application provides for the use of Zorvolex (diclofenac) Capsules 18 mg and 35 mg for the treatment of mild to moderate acute pain in adults.

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

WAIVER OF HIGHLIGHTS SECTION

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

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content

of labeling must be identical to the enclosed labeling text for the package insert and Medication Guide. Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*, available at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008).* Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission "**Final Printed Carton and Container Labels for approved NDA 204592**." Approval of this submission by FDA is not required before the labeling is used.

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

MARKET PACKAGE

Please submit one market package of the drug product when it is available to the following address:

Swati Patwardhan
Food and Drug Administration
Center for Drug Evaluation and Research
White Oak Building 22, Room: 3170
10903 New Hampshire Avenue
Silver Spring, Maryland
Use zip code **20903** *if shipping via United States Postal Service (USPS).*
Use zip code **20993** *if sending via any carrier other than USPS (e.g., UPS, DHL, FedEx).*

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for ages birth to less than 12 months because there is evidence strongly suggesting that the drug product would be unsafe in this pediatric group.

We are deferring submission of your pediatric studies for ages 1 year to less than 17 years for this application because this product is ready for approval for use in adults and the pediatric studies have not been completed.

Your deferred pediatric studies required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act/FDCA are required postmarketing studies. The status of the postmarketing studies must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the Federal Food, Drug, and Cosmetic Act/FDCA. The required studies are listed below.

2091-1 An open-label pharmacokinetic and safety study or studies of an age-appropriate formulation of Zorvolex in pediatric patients 6 years to less than 17 years of age with acute pain.

The timetable you submitted on August 30, 2013, states that you will conduct this study according to the following schedule:

Final Protocol Submission:	November 1, 2014
Study/Trial Completion:	May 3, 2015
Final Report Submission:	May 3, 2017

2091-2 An open-label pharmacokinetic and safety study or studies of an age-appropriate formulation of Zorvolex in pediatric patients 2 years to less than 6 years of age with acute pain.

The timetable you submitted on August 30, 2013, states that you will conduct this study according to the following schedule:

Final Protocol Submission:	June 6, 2015
Study/Trial Completion:	January 6, 2016
Final Report Submission:	January 6, 2018

2091-3 A pharmacokinetic, safety, and efficacy study or studies of an age-appropriate formulation of Zorvolex in pediatric patients 1 year to less than 2 years of age with acute pain.

The timetable you submitted on August 30, 2013, states that you will conduct this study according to the following schedule:

Final Protocol Submission:	January 6, 2018
Study/Trial Completion:	July 30, 2018
Final Report Submission:	July 30, 2020

Submit the protocol(s) to your IND 103880, with a cross-reference letter to this NDA.

Reports of these required pediatric postmarketing studies must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "**SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS**" in large font, bolded type at the beginning of the cover letter of the submission.

PROMOTIONAL MATERIALS

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

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266

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

EXPIRY DATING PERIOD

A 24-month expiry dating period is granted for Zorvolex (diclofenac) Capsules 18 mg and 35 mg when stored at 25°C (77°F) with excursions permitted from 15° to 30°C (59° to 86°F).

REPORTING REQUIREMENTS

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

If you have any questions, call Swati Patwardhan, Regulatory Project Manager, at (301) 796-4085.

Sincerely,

{See appended electronic signature page}

Sharon Hertz, MD
Deputy Director
Division of Anesthesia, Analgesia,
and Adduction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosure(s):
Content of Labeling
Carton and Container Labeling

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