DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 022255, 022253/S-006, 022254/S-003 **NDA APPROVAL**

Schwarz Biosciences, Inc.
Attention: Susan Tegtmeyer, M. S.
Senior Manager Regulatory Affairs
1950 Lake Park Drive
Smyrna, GA 30080

Dear Ms. Tegtmeyer:

Please refer to your September 28, 2007, New Drug Application (NDA) 022255, received September 28, 2007, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Vimpat (lacosamide) Oral Solution, 10 mg/ml.

We acknowledge receipt of your submissions to NDA 022255 dated October 16, 2009, and February 4, March 31, and April 20, 2010.

The October 16, 2009, submission constituted a complete response to our October 28, 2008, action letter.

This new drug application provides for the use of Vimpat (lacosamide) Oral Solution as adjunctive therapy in the treatment of partial-onset seizures in patients with epilepsy aged 17 years and older.

We further refer to your August 21, 2009, supplemental NDAs 022253/S-006 and 022254/S-003, received August 24, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Vimpat (lacosamide) Tablets and Injection. These supplements provide for a comprehensive Medication Guide and modified risk evaluation and mitigation strategy (REMS).

We acknowledge receipt of your submissions to NDAs 022253/S-006 and 022254/S-003 dated October 5 and 6, 2009, and March 31, and April 13, 2010. Finally, we acknowledge receipt of your April 20, 2010 amendments to NDAs 022253/S-006 and 022254/S-003 containing a modified REMS and REMS assessment.

We have completed our review of these applications, as amended and they are approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

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, please submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm, that is identical to the enclosed labeling (text for the package insert and Medication Guide). For administrative purposes, please designate this submission, "**SPL for approved NDAs 022255, 022253/S-006, and 022254/S-003."**

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and container labels that are identical to the carton and immediate container labels submitted on April 15, 2010, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (October 2005).* Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission "**Final Printed Carton and Container Labels for approved NDA 022255."** Approval of this submission by FDA is not required before the labeling is used.

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

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 0 to 1 month for these applications because necessary studies are impossible or highly impracticable because there are too few children with partial onset seizures in this age group to study.

In addition, we are deferring submission of your pediatric studies in partial onset seizures for ages 1 month up to 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 these postmarketing studies must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the FDCA. This required study is listed below.

1636-1 Deferred pediatric studies under PREA for the adjunctive treatment of partial onset seizures in pediatric patients ages 1 month up to 17 years.

Final Report Submission: July 2013

Submit final study reports to this NDA. For administrative purposes, all submissions related to this required pediatric postmarketing study must be clearly designated "**Required Pediatric Assessment**".

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

Section 505-1 of the FDCA authorizes FDA to require the submission of a REMS if FDA determines that such a strategy is necessary to ensure that the benefits of the drug outweigh the risks (section 505-1(a)). The details of the REMS requirements for Vimpat (lacosamide) Oral Solution were outlined in our REMS notification letter dated January 11, 2010.

The REMS for Vimpat (lacosamide) Tablets and Injection was originally approved on October 28, 2008. The REMS consists of a Medication Guide and a timetable for submission of assessments of the REMS. In a letter dated March 19, 2010 we notified you that the approved REMS for Vimpat (lacosamide) Tablets and Injection must be modified to include Vimpat (lacosamide) Oral Solution. The proposed modifications to the REMS consist of the addition of the oral solution formulation and revisions to the Medication Guide to include more comprehensive safety information.

Your proposed modified REMS, submitted on April 20, 2010 and appended to this letter, is approved. The REMS consists of a Medication Guide and a timetable for submission of assessments of the REMS.

The timetable for submission of assessments of the REMS will remain the same as that approved on October 28, 2008.

The REMS assessment plan should include but is not limited to the following:

a. An evaluation of patients' understanding of the serious risks of Vimpat (lacosamide) Tablets, Injection, and Oral Solution
b. A report on periodic assessments of the distribution and dispensing of the Medication Guide in accordance with 21 CFR 208.24
c. A report on failures to adhere to distribution and dispensing requirements, and corrective actions taken to address noncompliance

The requirements for assessments of an approved REMS under section 505-1(g)(3) include, in section 505-1(g)(3)(B) and (C), requirements for information on the status of any postapproval study or clinical trial required under section 505(o) or otherwise undertaken to investigate a safety issue. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 314.81(b)(2)vii and including any updates to the status information since the annual

report was prepared. Failure to comply with the REMS assessments provisions in section 505-1(g) could result in enforcement action.

We remind you that in addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of FDCA.

Prominently identify future submissions containing the REMS assessment or proposed REMS modification with the following appropriate wording in bold capital letters at the top of the first page of the submission:

NDA 022253, 022254, & 022255 REMS ASSESSMENT

NEW SUPPLEMENT FOR NDA 022253, 022254, & 022255
PROPOSED REMS MODIFICATION
REMS ASSESSMENT

NEW SUPPLEMENT FOR (NEW INDICATION FOR USE) FOR NDA022253, 022254, & 022255
REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)

If you do not submit electronically, please send 5 copies of REMS-related submissions.

ADDITIONAL CMC COMMENTS

1. Based on our analysis of the stability data and in accordance with ICH Q1E, we grant the proposed 18 month expiry for Vimpat® 10 mg/mL Oral Solution packaged in (b) (4) 200 mL, (b) (4) round amber PET bottles and in 200 mL (b) (4) round amber glass bottles, stored at controlled room temperature [25ºC (77ºF); excursions 15-30ºC (59-86ºF)].

2. Based on our analysis of the in-use stability data, we grant an in-use expiry of seven (7) weeks after first opening of the bottle for Vimpat® (lacosamide) Oral Solution.

3. Based on our review, we grant the request for a biowaiver for the in vivo bioequivalence study for Vimpat® (lacosamide) Oral Solution 10 mg/mL.

PROMOTIONAL MATERIALS

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

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

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

LETTERS TO HEALTH CARE PROFESSIONALS

If you issue a letter communicating important safety-related information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit an electronic copy of the letter to both this NDA and to the following address:

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

REPORTING REQUIREMENTS

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

If you have any questions, call Susan Daugherty, Regulatory Project Manager, at (301) 796-0878.

Sincerely,

{See appended electronic signature page}

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

Enclosure: Label and REMS

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