

MDA 87-301

Lemmon Company
Attention: Stanley Scheindlin
P.O. Box 30
Sellersville, PA 18960

Gentlemen:

Reference is made to your abbreviated new drug application dated March 19, 1980 submitted pursuant to Section 505(b) of the Federal Food, Drug, and Cosmetic Act for Phentermine Hydrochloride Capsules, 15 mg., Grey and Yellow.

Reference is also made to your amendment dated June 11, 1981.

We have completed the review of this abbreviated new drug application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly, the application is approved.

Any significant change in the conditions outlined in this abbreviated new drug application requires an approved supplemental application before the change may be made, except for changes made in conformance with other provisions of Section 314.8 of the new drug regulations.

This Administration should be advised of any change in the marketing status of this drug.

The requirement for adequate data to assure the biologic availability is being deferred at the present time. However, our action in approving this application is based upon an understanding that if this requirement is reinstated you will perform the appropriate procedures.

We request that you submit, in duplicate, any proposed advertising or promotional copy which you intend to use in your immediate advertising or promotional campaigns. Please submit both copies and a completed form FD-2253, together with a copy of the Final Printed Labeling, to the Division of Drug Advertising (HFD-170). A copy of Form FD-2253 is enclosed for your convenience.

We call your attention to regulation 21 CFR 310.300(b) (3) (or 431.60(b) (3) if Form 6] which requires that material for any subsequent advertising or promisional compaigns, at the time of their initial use, be submitted to our Division of Drug Advertising (HFD-170) with a completed form FD-2253.

The enclosures summarize the conditions relating to the approval of this application.

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COUTU XII.

Division of Generic Drug Monographs

Office of Drug Monographs

Bureau of Drugs

Prolosures:

Conditions of Approval of a New Drug Application

Records & Reports Recoirements

Form FD 2253

Mitaciment

cc:

cc:

PHI-DO

DUP

HFD-530

HFD-614

HFD-313

HFD-5

MSeife/JMeyer/MAJarski

r/d/ init. JMeyer/MSeife 6-11-81

f/t/wh/6-11-81

approved

4/12/8

6/0/81

ATTACHMENT

. For compendial ingredients, specifications and tests are to be in accord with currently official compendia.

NOA NUMBER

I MOTICE OF APPROVAL	•	L87-301	
NEW DRUG APPLICATION OR SUP	PLEMENT	DATE APPROVAL L	ETTER ISSUED
	JUN 12 1981		
TO:	FROM:	<u> </u>	7, 74,73
Press Relations Staff (HFI-40)		XXX Bureau of Drugs	
to the transfer of the territory	1	_	
		Bureau of Veterinary	Medicine
57	ATTENTION		
Forward original of this form for publication approval has been entered above.	n only after approval	letter has been issued and	the date of
TYPE OF APPLICATION			
COMMENT - ABBREVI	ATED SUPPLE	CATEGORY	
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Lemmon Company			
Sellersville, PA 18960			
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RINCIPAL INDICATION OR PHARMACOLOGICAL CATEGOR	RY		· ·
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FORM	PREPARED BY		
K		DATE /	
ry Ann Jarski		6/12/01	
- // PORM	APPROVED BY		

Jack L. Meyer FORM FD 1642 (2/75)

NAME

PREVIOUS EDITION MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

DATE

REVIEW OF ANDA

DATE COMPLETED: 4-21-80

ANDA# 87-301

Lemmon Company

Sellersville, PA 18960 ADDRESS:

NAME OF DRUG: Phentermine HCl Capsules 15 mg. (Gray & Yellow)

DATE OF SUBMISSION: 3-25-80

TYPE OF SUBMISSION: ANDA

CLINICAL EVALUATION:

1. Review of Studies: Pertinent Data is to be reviewed by the chemist Bioavailability Requirement: Not Required To be marketed under the Label of Drummer Laboratories which is a marketing Division of Lemmon Company

2. Review of Labels:

a) Container Labels: Satisfactory CIV Drummer taboratories 15 mg. capsules Bottles of 1,000

b) Insert Labeling: Satisfactory Date: 12-79

CONCLUSION: Insert Labeling is satisfactory

Container Labels are satisfactory *Does not state Prolonged, Slow: Delayed: Controlled: Resin Base,

But does state on capsule after breakfast

RECOMMENDATIONS: The firm is to be so notified,

N.V Karusaitts, M.D.>

cc: DUP

VVKarusaitis/pb/5/1/80

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE PUBLIC HEALTH SERVICE FOOD AND DRUG ADMINISTRATION

	2: Division of Drug Manufac	turing, HFD-320	DATE: April 9, 1980
M	: Division of Generic Dru	gs	, HFD- <u>530</u>
	Requester's Name: W.F.	Kochert 34040	Phone:
JECT	: GMP EVALUATION REQUEST		
	NDA, ANDA, and SUPPLEMENT NUR	MBER: ANDA 87-301	
	DRUG Trade Name: Phentermin	ne HCl Cap, 15 mg.(Gra	y & Yellow)
	DRUG Non-Proprietary Name:		
	DRUG CLASSIFICATION:	A or B1C	x Other
-	PRODUCT CODE: Capsule (CI	compres	otion of dosage form, e.g., seed tablet; elatin capsule; liquid; See Tab
	APPLICANT'S NAME:	Lemmon Company	
i	ADDRESS:	Sellersville, Pa. 18	3960
	FACILITIES TO BE EVALUATED: Lemmon Pharmacal Co.		Responsibility) Roads, West Rock Hill Townshi Bucks County, Pa.
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Z	FOR HFD-320 USE ONLY/		
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Ċ	c: HFD-320 (Orig) HFD- (2 Copies)		ARC 4/10/80

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87-202	Red & Yellow	30 mg.	IND NUMBER	
97-209 97-223	Red & Black	30 mg.	i ·	
87-301	Elack	30 mg.		
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Dr. Scheir	villin rada the crowl	ment to use only labeling	•	
that conta	unon the statement:		FIRM NAME	
	Drumer Laborator	les	Sellersville,	DB 19060
	Division of Lemon	i Co.	***************************************	SA TOLOG
ν ••• - • ·	Sellersville, PA	18960		
se said a	written statement oc	ntaining this consisteent	_	
could be s	ent by a commicati	on dated June 11, 1981		
	raft container label	s were sent to application	NAME AND TITLE OF WHOM CONVERSATION	PERSON WITH ON WAS HELD
01-223	•		Dr. Stanley Sc	heindlin
e Grande	774m mada 41		Director of Te	chnical
rinted la	pels per a communica	ment to submit final tion dated June 11, 1981.	Affairs	
I asked	l applications contacturing and Controls i for permission to extions for this info	ined complete Composition, and Stability data. cross-reference the committee.	TELEPHONE NO.	
r. Acheind	llin granted that per	mission.	215-723-5544	
MY CU CO	really official on	to he up-lated in accord pendia. I indicated this diment to the approval.		
. Scheind	lin agreed.			
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ORIGINAL IND/NDA

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Sellersville	PA 18960	CHRICI				EMENT (S)	
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see record of conclusions and approval	telephone conve						

FORM FDH 2266 (7/75)

PREVIOUS EDITION MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

LIMENCE - PERMINEURE HYDROCHLORIDE CADRITICS

86-911	Adipan-P	Rive and White	30 mg.
87-125	Polletized		30 mg.
87-190	Yallor		30 mg.
87-202	Red and Yellor		30 mg.
67-208	Red and Mack		30 mg.
87-223	Black		30 mg.
87-301	Grey and Black		
	- A		15 mg.

NDA NUMBER CHEMIST'S REVIEW, Page 2 Enter evaluation or comments for each item. If necessary, continue on 8° a 2011" paper. Key continuation to lies by symbol. Enter "NG" if no chance or "NA" if not applicable. **87-301** 20. COMPONENTS AND COMPOSITION (6, 7) see attached 21. FACILITIES AND PERSONNEL (84.6) included · 22. SYNTHESIS (8c) see chemist's review for 23. RAW MATERIAL CONTROLS (8d,e) a. NEW DRUG SL BSTANCE see chemist's review for 87-208 Note: specifications and tests for compendial items are to be updated in accord with currently official . OTHER INGREDIENTS compendia. 24. OTHER FIRM(e) (el) None 25. MANUFACTURING AND PROCESSING (66.h.j.k) see attached 26. CONTAINER (81) see chemist's review for 87-208 27. PACKAGING AND LABELING (\$1.0) included 28. LABORATORY CONTITOLS (In-Process and Finished Desage Form) (813) see attached and chemist's review for 87-208 29, STABILITY (4P) data not included for this drug dosage form- see chemist's revie 30. CONTROL NUMBERS (84) included 21. SAMPLES AND RESULTS (9) no results are included for this drug dosage form - see chemist's review for 32. LABELING (4) see attached 33. ESTABLISHMENT INSPECTION not on alert list of 6-5-81 M. RECALLS

MEMORANDUM

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE PUBLIC HEALTH SERVICE FOOD AND DRUG ADMINISTRATION

TO

Seymour Fishman, HFD-322

DATE: May 20, 1980

FROM

Assistant Chief, Foreign Inspection Staff

HFO-503

SUBJECT:

Foreign Inspection Information

Firm:

Applicant: Lemmon Pharm.

Sellersville PA NDA #87-301

A copy of the report of the most recent spection of the subject firm is attached. The investigator did not observe any objectionable conditions or practices and no FD 483 was issued. That inspection covered

The previous inspection covered Some minor deviations were noted and no FD 483 was issued. Before that, the firm was inspected for phentermine HCL bulk in There was no FD 483 issued and the investigator noted that the firm was operating at a high level of compliance. At that time, the firm had been manufacturing phentermine HCL since 1963.

Based upon this firm's inspection history, it appears that the firm could be approved as a source of phentermine HCL. The firm is drug-listed for that product. I have made a note that phentermine HCL should be covered during our next biennial reinspection (ca. 2/81).

If you have any questions please call me at X31855.

Richard J. DeRisio

Attachment

cc: HFD-530 (Kochert)

NDA 67-301

Lemman Company Attention: Stanley Scheindlin, D.Sc. P.G. Box 30 Sellersville, PA 18960

Gentlemen:

We acknowledge the receipt of your abbreviated new drug application submitted pursuant to Section 505(b) of the Federal Fooc, Drug, and Cosmetic Act for the following:

NAME OF DRUG: Phentermine Hydrochloride Capsules, 15 mg. (Gray & Yellow)

DATE OF APPLICATION Merch 19, 1980

DATE UF RECEIPT: March 25, 1980

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

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

Sincerely yours.

James C. Morrison Acting Disector Division of Generic Drug Monographs Office of Drug Monographs Sureau of Drugs

PHI-DO DUP HFD-614 JCMorrison/mlb/3-31-80 ack

PHENTERMINE HYDROCHLORIDE (IV CAPSULES 15 mg.

DESCRIPTION JUN 1 2 1981

nterwise hydrochloride is designated chemically as phenyl-tert- butylamine rachloride. It is a white crystalline powder, very soluble in water alcohol.

ACTIONS

Phenterwise hydrochloride is a sympathomisetic amine with pharmacologic activity similar to the prototype drugs of this class used in obesity, the amphetamines. Actions include central mervous system stimulation and elevation of blood pressure. Tachyphylaxis and tolerance have been demonstrated with all drugs of this class in which these phenomena have been looked for.

Drugs of this class used in obesity are commonly known as "anorectics" or "anorexigenics". It has not been established, however, that the action of such drugs in treating obesity is primarily one of appetite suppression. Other central mervous system actions, or metabolic effects, may be involved, for

Adult obese subjects instructed in dietary management and treated with "anorectic" drugs, lose more weight on the average than those treated with placebo and diet, as determined in relatively short-term clinical trials.

The magnitude of increased weight loss of drug-treated patients over placebotreated patients is only a fraction of a pound a week. The rate of weight loss is greatest in the first weeks of therapy for both drug and placebo subjects and tends to decrease in succeeding weeks. The possible origins of the increased weight loss due to the various drug effects are not established. The amount of weight loss associated with the use of an "anorectic" drug varies from trial to trial, and the increased weight loss appears to be related in part to variables other than the drug prescribed, such as the physicftn-investigator, the population treated, and the diet prescribed. Studies do not permit conclusions as to the relative importance of the drug and non-drug factors on weight loss.

The natural history of obesity is measured in years, whereas the studies cited are restricted to a few weeks duration; thus, the total impact of drug-induced weight loss over that of diet alone must be considered clinically limi-

INDICATIONS

Phenterwine hydrochloride is indicated in the management of exogenous obesity as a short term adjunct (a few weeks) in a regimen of weight reduction based on caloric restriction.

The limited usefulness of agents of this class (see ACTIONS) should be measured against possible risk factors inherent in their use such as those described below.

CONTRAINDICATIONS

Advanced arteriosclerosis, symptomatic cardiovascular disease, moderate to severe hypertension, hyperthyroidism, known hypersensitivity or idiosyncrasy to the sympathomimetic amines, glaucoma.

Agitated states.

Patients with a history of drug abuse.

During or within 14 days following the administration of monoamine oxidase inhibitors (hypertensive crises may result).

WARN I NGS

Tolerance to the anorectic effect usually develops within a few weeks. When this occurs, the recommended dose should not be exceeded in an attempt to increase the effect; rather, the drug should be discontinued.

Phentermine hydrochloride may impair the ability of the patient to engage in poten-tially hazardous activities such as operating machinery or driving a motor vehicle; the patient should therefore be cautioned accordingly.

BRUG DEPENDENCE: Phentermine hydrochloride is related chemically and pharmacologically to the amphetamines. Amphetamines and related stimulant drugs have been extensively abused, and the possibility of abuse of phentermine hydrochloride should be kept in mind when evaluating the desirability of including a drug-as part of a weight reduction program. Abuse of amphetamines and related drugs may be associated with intense psychological dependence and severe social disfunction. There are reports of patients who have increased the dosage to many times that recommended. Abrupt cessation following prolonged high dosage administration results in extreme fatigue and mental depression; changes are also noted on the sleep EEG. Manifestations of chronic intoxication with anorectic drugs include severe dermatoses, marked insomnia, irritability, hyperactivity, and personality changes. The most severe manifestation of chronic intoxications is psychosis, often clinically indistinguishable from schizophrenia.

USING IN PREGMANCY: No reproduction studies or teratology studies of phentermine hydrochloride, in animals or humans, have been published. Therefore, use of phentermine hydrochloride by women who are or may become pregnant requires that the potential benefit be weighed against the possible hazard to mother and infant.

USAGE IN CHILDREN: Phenterwine hydrochloride is not recommended for use in children under 12 years of age.

PRECAUTIONS

Caution is to be exercised in prescribing phenterwine hydrochloride for patients with even mild hypertension.

Insulin requirements in diabetes mellitus may be altered in association with the use or phentermine hydrochleride and the concomitant dietary regimen.

Phontoruine hydrochloride may decrease the hypotensive effect of guanethidine.

The least amount feasible should be prescribed or dispensed at one time in order to minimize the possibility of overdosage.

This product contains FDEC Yellow No. 5 (tartrazine) which may cause allergictype reactions (including brenchial asthma) in certain susceptible individuals. Although the overall incleance of FDEC Yellow No. 5 (tartrazine) sensitivity in the general population is low, it is frequently seen in patients who also have aspirin hypersensitivity.

ADVERSE REACTIONS

Cardiovascular: Palpitation, tachycardia, elevation of blood pressure.

Central Nervous System: Overstimulation, restlessmess, dizziness, insomnia, auphoria, dysphoria, tramor, headache; rarely psychotic episodes at recommended doses.

<u>Gastrointestinal</u>: Drymess of the mouth, unpleasant taste, diarrhea, constipation, other gastrointestinal disturbances.

Allergic: Urticaria.

Endocrine: Impotence, changes in libido.

DOSAGE AND ADMINISTRATION

The usual adult dose is one capsule daily, administered approximately 2 hours after breakfast. Dosage may be adjusted to the patient's need.

Phenterwine hydrochloride is not recommended for use in children under 12 years of age.

OVERDOSAGE

Manifestations of acute overdosage with phenteraine hydrochloride include restlessness, tremor, hyperreflexia, rapid respiration, confusion, assaultive behavior, hallucinations, panic states.

Fatigue and depression usually follow the central stimulation.

Cardiovascular effects include arrhythmias, hypertension or hypotension and circulatory collapse. Gastrointestinal symptoms include mauses, wanting, diarrhea, and abdominal cramps. In fatal poisoning, death is usually preceded by convulsions and comme.

Management of acute phentermine hydrochloride intoxication is largely symptomatic and includes lavage and sedation with a barbiturate. Experience with hemodialysis or peritoneal dialysis is inadequate to permit recommendation in this regard. Acidification of the urine increases phentermine hydrochloride excretion. Intravanous phentolamine (Regitine) has been suggested for possible acute, savere hypertension, if this complicates phentermine hydrochloride overdosage.

HOM SUPPLIED

Bottles of 1000 capsules.

CAUTION

Federal law prohibits dispensing without prescription.

Printed in U.S.A. 12/79

Copies of the label and all other labeling to be used for the drug.

LABELS

majous ki

Usual Adult Dosage: One capsule daily, administered approximately 2 hours after breakfast. If necessary dose may be increased to two capsules daily. See package insert for full prescribing information. Contains color additives including FD&C Yellow No. 5 (Tartrazine)

Each gray & yellow capsule contains: Phentermine Hydrochloride 15 mg. (equivalent to 12 mg. of Phentermine base)

Caution: Federal law prohibits dispensing without prescription.

Dispense in tight containers protected from moisture.

Store at controlled room temperature.

JUN 1 2 1981 MA

1000 CAPSULES

1

APPROVED

Usual Adult Dosage: One capsule daily, administered approximately 2 hours after breakfast. If necessary dose may be increased to two capsules daily. See package insert for full prescribing information. Contains color additives including FD&C Yellow No. 5 (Tartrazine)

Each gray & yellow capsule contains:

Phentermine Hydrochloride 15 mg.
(equivalent to 12 mg. of Phentermine base)

Caution: Federal law prohibits dispensing without prescription.

1000 CAPSULES

Dispense in tight containers protected from moisture. Store at controlled room temperature.

JUN 1 2 1981

APPROVE

NEW DRUG APPLICATION

NDA No. 87-30/

NAME OF APPLICANT

LEARON Co.

NAME OF NEW DRUG

CESSES

CESS

08-58

approved 6-12-51

NAME OF NEW DRUG

ANDA 87-301/S-014

Eon Labs Attention: Yau-Kit Lam 227-15 N. Conduit Avenue Laurelton, NY 11413

DEC 1 9 4994

Dear Sir:

This is in reference to your supplemental new drug application dated July 23, 1990, submitted pursuant to 21 CFR 314.70 regarding your abbreviated new drug application for Phentermine Hydrochloride Capsules, 15 mg (Grey/Yellow).

The supplemental application provides for the addition of as a contract facility for microbiological and analytical testing.

We have completed the review of this supplemental application and it is approved.

We remind you that you must comply with the requirements for an approved abbreviated new drug application described in 21 CFR 314.80-81.

The material submitted is being retained in our files.

Sincerely yours,

Florence S. Fang Acting Director Division of Chemistry II Office of Generic Drugs Center for Drug Evaluation and Research ANDA 87-301/S-014

NAME AND ADDRESS OF APPLICANT: Eon Labs

227-15 N. Conduit Avenue Laurelton, NY 11413

<u>PURPOSE OF SUPPLEMENT</u> Addition of contract facility.

DATE(S) OF SUBMISSION(S)
July 23, 1990.

PHARMACOLOGICAL CATEGORY

TRADE NAME NA NONPROPRIETARY NAME
Phentermine HCl

Anorexiant

DOSAGE FORM

DOSAGE FORM
Capsule (Grey/Yellow)

POTENCY 15 mg RX OR OTC

Rx

SAMPLES NA RELATED IND/NDA/DMF NA

STERILIZATION

NA

LABELING

BIOEOUIVALENCY STATUS

والمنطوح والمنازية والمنازية

ESTABLISHMENT INSPECTION
Satisfactory. CGMP compliance status-acceptable, 12/5/94.

COMPONENTS, COMPOSITION, MANUFACTURING, CONTROLS

The purpose of the supplement is to add the following contract facility:

The contract lab will conduct microbiological testing on the components of the drug product in addition to analytical testing.

<u>PACKAGING</u>

NA

STABILITY

NA

REMARKS AND CONCLUSION Approvable.

RECALLS

<u>Reviewer</u> Andrew J. Langowski

Date Completed 12/9/94



Memorandum

Date

March 21, 1990

From

R M. Patel, PL.D. Supervisory (Lemis)

Subject

ANDA 97-301/5011 of Vitarine: Chentermine H(1 (aprilies, 15 mg

To

Mr. Caul Vuget, Chief. Non-Sterile Drug Brunch

Attached is a cover letter from the applicant that describes information, probably conveyed by Compriance to the form, during the meeting lested July 7, 1585.

All we have it their version. Therefore, it would help the review chemist its (a) the minutes of the metry is first in the AWDA, and (b) some imput is provided by Compliance concerning their over latter, especially for their last paragraph (pages 2 and 3).

At is undertood that the firm is (till on the Alexander from your office from the concidency chetter this submission should be recommended for dyproval. Please be alored that the review chemist () or Dayor) has not yet charted on this project, except that he is tailing dequation - color to do.

Please call us (443-1390) and/or sent us some information or that wounds the RIGHT job.

1206274,06-2 3/20/9.

(. Dr. S. DWart

ARDA 87-190/S-013 (Yellow - 30 mg) 87-208/S-013 (Red/8lack - 30 mg) 87-223/S-013 (Black - 30 mg) 87-301/S-012 (Grey/Yellow - 15 mg)

Vitarine Pharmaceuticals. Inc. Attention: Andrea Garrity 227-15 h. Conduit Avenue Springfield Gardens. BY 11413

Dear Madam:

Reference is made to your supplemental new drug applications submitted pursuant to Section 314.70 of the Regulations, dated September 19, 1989, regarding your abbreviated new drug applications for Phentermine Hydrochloride Capsules, USP.

The supplemental applications provide for revised package insert labeling.

We have completed the review of these supplemental applications and they are approved. Our letters of June 12, 1981 detailed the conditions relating to the approval of these abbreviated applications.

The material submitted is being retained in our files.

Sincerely yours,

Acting Director
Division of Generic Drugs
Center for Drug Evaluation and Research

.०/1/89

cc: HFD-238 '

HFD-83 .- 1710'S

JPh1111ps/KJohnson/sb/9/28/89

8384A pg: 5 /APPROVAL

OLUME ________

NEW DRUG APPLICATION NDA No. 57-30

NAME OF APPLICANT

NAME OF NEW DRUG Phentermin ICL Capsulga 15 ARCHIVAL COPYGYON E yellow

FORM FDA 2626 (7/84)

THIS CIRCUSSION, VOI

^*V

VOLUME

NEW DRUG APPLICATION NDA No. 87-30/

NAME OF APPLICANT Vitarine

Phenter mine HCl Caps., 15 mg (Grey/Yellow)

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FDA 2626 (7/84)

THIS SUBMISSION: VOL

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NDA 87-301

Food and Drug Administration Rockville MD 20857

Vitarine Pharmaceuticals, Inc. Attention: Gail Prince 227-15 N. Conduit Avenue Springfield Gardens, NY 11413

nct 2.9 1983

Dear Madam:

Reference is made to the dissolution data you submitted on September 11, 1986 for Phentermine Hydrochloride Capsules, 15 mg.

The data have been reviewed by our Division of Bioequivalence and they have the following comments:

- "1. The dissolution testing conducted by the firm on its Phentermine HCl
 15 mg Capsules, lot #860703, manufactured at Springfield Gardens, NY,
 is acceptable.
- 2. The dissolution testing should be incorporated into your manufacturing controls and stability program. Dissolution testing should be conducted in 500 ml of water using USP XXI apparatus II (paddle) at 50 rpm. The test product should meet the following specification:

Not less than of the labeled amount of phentermine HCl in the capsule is dissolved in 45 minutes.

3. From the bioequivalence point of view, the firm has met the bioequivalence requirements and the firm's Phentermine HCl 15 mg Capsules manufactured at Springfield Gardens, NY, lot \$860703, are deemed bioequivalent to the firm's Phentermine HCl 15 mg Capsules manufactured at South Hackensack, NY, lot \$A52128."

Marvin Seife, M.D.

Director

Division of Generic Drugs Office of Drug Standards

Center for Drugs and Biologics