DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 09-170/S-031

Valeant Pharmaceuticals International
Attention: Arthur Rosenthal, RAC
Sr. Director, Regulatory Affairs
One Enterprise
Aliso Viejo, CA 92656

Dear Mr. Rosenthal:

Please refer to your supplemental new drug application dated February 21, 2008 received February 22, 2008, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Mysoline® (primidone) Tablets, 250 mg.

We acknowledge receipt of your submissions dated February 27, 2008, April 25, 2008, and May 20, 2008.

This supplemental new drug application provides for an alternate manufacturer of the 250 mg tablet. In addition, because this new tablet differs in appearance from the previously approved 250 mg tablet, this supplemental application provides for Valeant's plan to launch an education campaign to physicians, pharmacists, and patient advocacy and other relevant organizations to notify them of these changes to minimize confusion in the retail channel.

We have completed our review of this application, as amended. This application is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text submitted on April 25, 2008.

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/oc/datacouncil/spl.html that is identical to the package insert submitted April 25, 2008. Upon receipt, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission, "SPL for approved NDA 09-170."

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and container labels that are identical to the submitted carton and immediate container labels, dated April 25, 2008, 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 09-170**." 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.

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(s) 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(s), 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 www.fda.gov/cder/ddmac.

LETTERS TO HEALTH CARE PROFESSIONALS

We note that you plan to issue several letters communicating to prescribers, pharmacists, and patients the change in supplier and appearance of the product. When these letters issue, we request that you submit copies of the letters to this NDA and copies to the following address:

MEDWATCH
Food and Drug Administration
Suite 12B05
5600 Fishers Lane
Rockville, MD 20857

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 Jacqueline H. Ware, PharmD, Senior Regulatory Project Manager, at (301) 796-1160.

Sincerely,

{See appended electronic signature page}

Russell Katz, MD
Director
Division of Neurology Products
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/

Russell Katz

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