DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 20-505/S-036
NDA 20-844/S-030

Ortho-McNeil-Janssen Pharmaceuticals, Inc.
c/o Johnson & Johnson Pharmaceutical Research & Development, L.L.C.
Attention: Stefan Ochalski, M.B.A.
1125 Trenton-Harbourton Road; P.O. Box 200
Titusville, N.J. 08560

Dear Mr. Ochalski:

Please refer to your supplemental new drug applications dated April 18, 2008, received April 18,2008, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Topamax® (topiramate) Tablets, 25, 50, 100 and 200 mg, and Topamax® (topiramate) Sprinkle Capsules, 15 mg and 25 mg.

These supplemental new drug applications provide for the addition of "maculopathy" to the ADVERSE REACTIONS-Postmarketing and Other Experience section of the Package Insert and related section of the Patient Package Insert.

We also refer to the teleconference on March 9, 2009, between representatives from J&J Pharmaceutical Research & Development and this division. In that teleconference we agreed to the inclusion of maculopathy in the ADVERSE REACTIONS-Postmarking and other Experience section. In addition, we agreed to keep the language in the PPI as previously approved.

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

The final printed labeling (FPL) must be identical to the enclosed labeling.

Please submit an electronic version of the FPL according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDA.* Alternatively, you may submit 20 paper copies of the FPL as soon as it is available but no more than 30 days after it is printed. Individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, designate these submissions "**FPL for approved supplement NDA 20-505/S-036 and NDA 20-844/S-030**." Approval of these submissions by FDA is not required before the labeling is used.

In addition, submit three copies of the introductory promotional materials that you propose to use for these products. Submit all proposed materials in draft or mock-up form, not final print. Send one copy to this division and two copies of both the promotional materials and the package insert directly 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

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

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

Although we have approved the agreed upon label, we believe that the potential for topiramate to cause "maculopathy" needs to be examined further. Therefore, we request that you submit the controlled trial data (which you alluded to in our teleconference), where visual function was carefully monitored in at least some patients with special testing/evaluations.

You also responded that your safety databases for clinical trials of various clinical development programs (including controlled trials) may include more detailed data about ophthalmologist visits when patients experienced an ocular adverse event. We request that you submit analyses of all of these data. We also recommend that your analyses of these data attempt to be as specific as possible regarding abnormalities rather than merely noting that results were categorically normal or "abnormal."

Lastly, we believe that continued vigilance on this issue is required and request that all post-marketing reports suggesting any possible type of "retinopathy" be submitted in an expedited fashion and that every effort be made to obtain follow-up, to explore causality, and to determine whether such changes result from a mechanism other than that due to secondary angle closure glaucoma. Please focus your submission of post-marketing reports on those that include any of the following preferred terms: maculopathy, retinal deposits, macular degeneration, retinopathy, retinal dystrophy, retinal disorder, retinal pigment epitheliopathy, chorioretinal disorder, retinal degeneration, or retinal pigmentation, and any other terms that you deem as potentially relevant.

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: Labeling

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

4/22/2009 10:23:26 AM