DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 21-001/S-010 & S-011

Melissa L. Gannon
Associate Director, Regulatory Affairs
Johnson & Johnson Pharmaceutical Research & Development
920 Route 202 South
Raritan, NJ 08869

Dear Ms. Gannon:

Please refer to your supplemental new drug applications dated and received July 5, 2007 and October 31, 2008, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Axert (almotriptan) tablets.

We acknowledge receipt of your submission dated March 13, 2009.

These supplemental new drug applications provide for cautionary language regarding the use of AXERT (almotriptan) tablets in patients with a known hypersensitivity to sulfonamides (S-010), and for the acute treatment of pediatric migraine (S-011).

We have completed our review of these applications, as amended. These applications are approved, 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, and include the minor editorial revisions indicated, to the enclosed labeling (text for the package insert, text for the patient package insert and submitted labeling (immediate container and carton labels submitted October 31, 2008). These revisions are terms of the approval of this application.

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 this submission "**FPL for approved supplement NDA 21-001/S-010 & S-011**." Approval of this submission by FDA is not required before the labeling is used.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute (section 505(o)(3)(A)).

AXERT (almotriptan) was approved on May 7, 2001 for the acute treatment of migraine in adults. As we are now expanding its indication to a new pediatric population, the risk of effects on growth and development, specific to that population, must be considered. Therefore, the extension of the indication to pediatrics changes the risk benefit profile of AXERT (almotriptan) and is considered to be "new safety information" as defined in FDAAA.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to identify an unexpected serious risk of adverse effects on postnatal growth and development.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA has not yet been established and is not sufficient to assess this serious risk.

Therefore, based on appropriate scientific data, FDA has determined that you are required, to conduct the following:

1. A juvenile rat toxicology study to identify the unexpected serious risk of adverse effects on postnatal growth and development. The study should utilize animals of an age range and stage(s) of development that are comparable to the intended pediatric population; the duration of dosing should cover the intended length of treatment in the pediatric population. In addition to the usual toxicological parameters, this study should evaluate effects of almotriptan on growth, reproductive development, and neurological and neurobehavioral development.

   Protocol Submission: by [November 2009]
   Study Completion Date: by [February 2010]
   Final Report Submission: by [August 2011]

Submit the protocols to your IND 53,854 with a cross-reference letter to this new drug application (NDA), NDA 21-001/S-011. Submit all final reports to your NDA 21-001/S-011. Use the following designators to prominently label all submissions, including supplements, relating to these postmarketing studies as appropriate:

- **Required Postmarketing Protocol under 505(o)**
- **Required Postmarketing Final Report under 505(o)**
- **Required Postmarketing Correspondence under 505(o)**

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii), provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii). We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or

clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

In addition, submit three copies of the introductory promotional materials that you propose to use for this product. 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

Please submit one market package of the drug product when it is available.

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 Lana Chen, Regulatory Project Manager, at (301) 796-1056.

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

Enclosure

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Norman Hershkowitz
4/30/2009 05:08:14 PM
Dr. Norman Hershkowitz signing for Dr. Russell Katz