DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 22-128/S-002 **SUPPLEMENT APPROVAL**

ViiV Healthcare Company
Attention: O. Lucy Castro, R.Ph, M.S.
Director, Worldwide Regulatory Affairs and Quality Assurance
235 East 42nd Street
New York, NY 10017

Dear Ms. Castro:

Please refer to your supplemental new drug application dated December 23, 2008, accepted for review on January 21, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for SELZENTRY (maraviroc) 150 mg and 300 mg tablets.

We acknowledge receipt of your submissions dated January 8, 2009, March 4, 2009, March 17, 2009, April 1, 2009, May 21, 2009, June 16, 2009, June 23, 2009, June 26, 2009, July 10, 2009, July 16, 2009, August 25, 2009, September 4, 2009, September 8, 2009, September 11, 2009, September 29, 2009, November 2, 2009, November 4, 2009, November 12, 2009, November 17, 2009, November 18, 2009(2), November 19, 2009 (3) and November 20, 2009 (3).

This prior approval supplemental new drug application proposes to expand the indication to treatment of therapy-naïve adults infected with CCR5-tropic HIV-1 virus in combination with other antiretroviral agents.

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

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)(1)(i)] in structured product labeling (SPL) format as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/ucm155657.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 NDA 22-128/S-002.

Within 14 days from the date of this letter, please amend all pending supplemental applications for this NDA, including pending "Changes Being Effected" (CBE) supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in

structured product labeling (SPL) format that includes the changes approved in this supplemental application.

LABELING

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert and Medication Guide).

AGREEMENTS

(b) (4)

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)).

Since SELZENTRY™ was approved on August 6, 2007, we have become aware of the potential for an increased risk of hepatotoxicity in patients taking SELZENTRY with antituberculous medications during a clinical trial. Therefore, we consider this information 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 assess a potential signal of a serious risk of hepatotoxicity in patients taking concomitant antituberculous medications.

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.

Finally, we have determined that only a clinical trial (rather than a nonclinical or observational study) will be sufficient to assess a signal of a serious risk of hepatotoxicity in patients taking concomitant antituberculous medications.

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

1571-1 Focused safety analyses in patients taking concomitant drugs for treatment of tuberculosis (TB) or isoniazid (INH) monotherapy for TB prophylaxis in the CADIRIS Study: CCR5 Antagonism to Decrease the Incidence of the Immune

Reconstitution Inflammatory Syndrome in HIV-Infected Patients. The analyses should compare subjects randomized to maraviroc versus placebo. The final study report should contain analyses and a summary of hepatic laboratory abnormalities, hepatic adverse events, Grade 3 and 4 adverse events, serious adverse events, discontinuations due to adverse events, and deaths, as well as narrative summaries for serious adverse events, discontinuations and deaths regardless of causality.

The timetable you submitted on DATE states that you will conduct this study according to the following timetable:

Final Protocol Submission:	November 4, 2009
Study Completion Date:	June 30, 2011
Final Report Submission:	December 31, 2012

Submit the protocol to your IND, with a cross-reference letter to this NDA. Submit all final reports to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate:

- **REQUIRED POSTMARKETING PROTOCOL UNDER 505(o)**
- **REQUIRED POSTMARKETING FINAL REPORT UNDER 505(o)**
- **REQUIRED POSTMARKETING CORRESPONDENCE UNDER 505(o)**

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 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
5600 Fishers Lane, Room 12B05
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 Stacey Min, Pharm.D., Regulatory Project Manager, at (301) 796-4253 or 301-796-1500.

Sincerely,

{See appended electronic signature page}

Debra Birnkrant, M.D.
Director
Division of Antiviral Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

Enclosure
Content of Labeling

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
NDA-22128	SUPPL-2	PFIZER LABORATORIES DIV PFIZER INC	Selzentry, Maraviroc, UK-427,857

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

/s/

JEFFREY S MURRAY
11/20/2009