

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

ANDA 75-932/ S-001, S-002

Name: Bupropion Hydrochloride Extended-release Tablets USP,
100 mg and 150 mg

Sponsor: Eon Labs, Inc.

Approval Date: March 22, 2004

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 75-932/ S-001, S-002

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APPLICATION NUMBER:
ANDA 75-932/ S-001, S-002

APPROVAL LETTER

MAR 22 2004

Eon Labs, Inc.
Attention: Enna Krivitsky
227-15 North Conduit Avenue
Laurelton, NY 11413

Dear Madam:

This is in reference to your supplemental abbreviated new drug applications dated December 18, 2003, submitted under Section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), regarding your abbreviated new drug application (ANDA) for Bupropion Hydrochloride Extended-release Tablets USP, 100 mg and 150 mg (Twice-A-Day Dosing).

Reference is made to your correspondence dated March 22, 2004. Reference is also made to our letter dated November 25, 2003, granting final approval to your Bupropion Hydrochloride Extended-release Tablets USP, 100 mg, and designating your Bupropion Hydrochloride Extended-release Tablets USP, 150 mg, as tentatively approved.

The supplemental applications provide for:

- S-001: Final approval of your Bupropion Hydrochloride Extended-release Tablets USP, 150 mg; and
- S-002: Updated final-printed labeling to include the 150 mg strength.

We have completed the review of these supplemental abbreviated applications and they are approved. Based upon the information you have presented to date, we have concluded that your Bupropion Hydrochloride Extended-release Tablets USP, 150 mg, are safe and effective for use as recommended in the submitted labeling.

The Division of Bioequivalence has determined your Bupropion Hydrochloride Extended-release Tablets USP, 150 mg, (twice-a-day dosing) to be bioequivalent and therapeutically equivalent to the listed drug (Wellbutrin SR[®] Sustained-Release Tablets, 150 mg, of GlaxoSmithKline). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application. The "interim" dissolution specifications are as follows:

Dissolution testing should be conducted in 900 mL of 0.1N HCl, pH 1.5, at 37°C, using USP 26 Apparatus I (basket) at 50 rpm. The test product should meet the following "interim" specifications:

<u>Time (Hours)</u>	<u>% Dissolved</u>
1	_____
2	_____
4	_____
6	NLT _____

The "interim" dissolution tests and tolerances should be finalized by submitting dissolution data for the first three production size batches. Data should be submitted as a "Special Supplement - Changes Being Effected" when there are no revisions to the "interim" specifications or when the final specifications are tighter than the "interim" specifications. In all other instances, the information should be submitted in the form of a Prior Approval Supplement.

The listed drug product referenced in your supplemental application, Wellbutrin SR[®] Tablets, 150 mg, of GlaxoSmithKline, is subject to multiple periods of patent protection. The following United States patents and their expiration dates currently appear in the Agency's publication entitled Approved Drug Products with Therapeutic Equivalence Evaluations, the "Orange Book":

<u>Patent Number</u>	<u>Expiration Date</u>
5,358,970 (the '970 patent)	August 12, 2013
5,427,798 (the '798 patent)	August 12, 2013
5,731,000 (the '000 patent)	August 12, 2013
5,763,493 (the '493 patent)	August 12, 2013

Your application contains paragraph IV certifications to each of these patents under Section 505(j)(2)(A)(vii)(IV) of the Act stating that none of these patents will be infringed by your manufacture, use, offer for sale, or sale of Bupropion Hydrochloride Extended-release Tablets USP, 150 mg. Section 505(j)(5)(B)(iii) of the Act provides that approval of an ANDA shall be made effective immediately, unless an action is brought against Eon Labs, Inc. (Eon) for infringement of one or more of the patents which were the subjects of the paragraph IV certifications. This action must be brought against Eon prior to the expiration of forty-five (45) days from the date the notice you provided under paragraph (2)(B)(i) was received by the patent and NDA holder(s). You have informed the Agency that Eon complied with the requirements of Section 505(j)(2)(B) of the Act and that no action for infringement of the '970, '000, or '493 patents was brought against Eon within the statutory forty-five day period. You have also informed the agency that with regard to the '798 patent, Glaxo Wellcome, Inc. initiated a patent infringement action against Eon in the United States District Court for the Southern District of New York (Glaxo Wellcome, Inc. v. Eon Labs Manufacturing, Inc.), Civil Action No. 00-CIV-9089. With regard to this litigation, the Agency recognizes that the 30-month period identified in Section 505(j)(5)(B)(iii) of the Act, during which time the FDA was precluded from approving your application, has expired.

Please note that approval is being granted for your Bupropion Hydrochloride Extended-release Tablets USP, 150 mg, even though the Office of Generic Drugs received and filed an ANDA containing paragraph IV certifications to the listed patents for this drug product prior to the receipt of your application. Accordingly, your supplemental application would not be eligible for full approval until 180-days following the earlier of one of the following triggering events:

1. the date the Secretary receives notice from the applicant of the previous ANDA that commercial marketing of the 150 mg strength of the drug product approved in that application was initiated, or

2. the date of a decision of a court holding the patents that were the subjects of the paragraph IV certifications to be invalid or not infringed [Section 505(j) (5) (B) (iv)].

We refer you to the Agency's guidance document entitled "180-Day Generic Drug Exclusivity Under the Hatch-Waxman Amendments" (June 1998). However, in a communication dated March 19, 2004, the holder of the ANDA referred to above as being received and filed prior to your application informed the Agency that it has relinquished its eligibility for 180-day exclusivity with respect to the patents listed above for Bupropion Hydrochloride Extended-release Tablets USP, 150 mg. Thus, by relinquishing its eligibility for 180-day generic drug exclusivity, the prior applicant recognizes that the relinquishment will apply to all ANDAs for Bupropion Hydrochloride Extended-release Tablets USP, 150 mg, and that the Office of Generic Drugs may approve any such application without regard to the 180-day exclusivity period specified in Section 505(j) (5) (B) (iv).

Under Section 506(A) of the Act, certain changes in the conditions described in this ANDA require an approved supplemental application before the change can be made.

Post-marketing requirements for this ANDA for Bupropion Hydrochloride Extended-release Tablets USP, 150 mg are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of your Bupropion Hydrochloride Extended-release Tablets USP, 150 mg.

We request that you submit, in duplicate, any proposed advertising or promotional copy that you intend to use in your initial advertising or promotional campaigns for the 150 mg strength. Please submit all proposed materials in draft or mock-up form, not final print. Submit both copies together with a copy of the final printed labeling to the Division of Drug Marketing, Advertising, and Communications (HFD-40). Please do not use Form FDA 2253 (Transmittal of Advertisements and Promotional Labeling for Drugs for Human Use) for this initial submission.

We call your attention to 21 CFR 314.81(b)(3) which requires that materials for any subsequent advertising or promotional campaign be submitted to our Division of Drug Marketing, Advertising, and Communications (HFD-40) with a completed Form FDA 2253 at the time of their initial use.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Gary Buehler", with a stylized flourish at the end.

Gary Buehler
Director
Office of Generic Drugs
Center for Drug Evaluation and Research

3/22/04

**APPEARS THIS WAY
ON ORIGINAL**

cc: ANDA 75-932
Division File
Field Copy
HFD-600/R.West
HFD-330
HFD-205
HFD-600/Orange Book
HFD-600/D.Hare

Endorsements:

HFD-647/B.Wu/3/18/04 *Boin Wu 3/18/04*
HFD-647/S.Rosencrance/3/18/04 *M. Rosencrance 3/18/04*
HFD-617/T.Hinchliffe/3/18/04
HFD-613/M.Shin/3/18/04 *3/19/04*
HFD-613/L.Golson/3/18/04 *3/19/04* *3/19/04*

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APPROVAL - 150 MG

Robert West
3/22/2004

APPEARS THIS WAY
ON ORIGINAL

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 75-932/ S-001, S-002

APPROVED LABELING

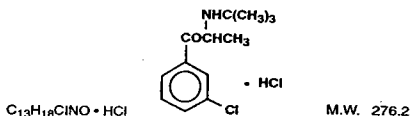
APPROVED

MAR 22 2004

Bupropion Hydrochloride Extended-Release Tablets Rx only

DESCRIPTION

Bupropion hydrochloride extended-release, an antidepressant of the aminoketone class, is chemically unrelated to tricyclic, tetracyclic, selective serotonin re-uptake inhibitor, or other known antidepressant agents. Its structure closely resembles that of diethylpropion; it is related to phenylethylamines. It is designated as (+)-1-(3-chlorophenyl)-2-[(1,1-dimethylethylamino)-1-propanone]hydrochloride. The molecular weight is 276.2. The molecular formula is $C_{13}H_{18}ClNO \cdot HCl$. Bupropion hydrochloride powder is white, crystalline, and highly soluble in water. It has a bitter taste and produces the sensation of local anesthesia on the oral mucosa. The structural formula is:



Each tablet for oral administration contains either 100 mg or 150 mg of bupropion hydrochloride and the following inactive ingredients: carnauba wax, hydroxypropyl cellulose, magnesium stearate, microcrystalline cellulose, hypromellose, titanium dioxide, macrogol PEG 400, and polysorbate 80. In addition, the 100 mg tablet contains FD&C Blue No. 1 Lake, and the 150 mg tablet contains FD&C Red No. 40 Lake and FD&C Blue No. 2 Lake.

CLINICAL PHARMACOLOGY

Pharmacodynamics: Bupropion is a relatively weak inhibitor of the neuronal uptake of norepinephrine, serotonin, and dopamine, and does not inhibit monoamine oxidase. While the mechanism of action of bupropion, as with other antidepressants, is unknown, it is presumed that this action is mediated by noradrenergic and/or dopaminergic mechanisms.

Pharmacokinetics: Bupropion is a racemic mixture. The pharmacologic activity and pharmacokinetics of the individual enantiomers have not been studied.

The mean elimination half-life ($\pm$ SD) of bupropion after chronic dosing is 21 ($\pm$ 9) hours, and steady-state plasma concentrations of bupropion are reached within 8 days.

In a study comparing chronic dosing with bupropion hydrochloride extended-release tablets 150 mg twice daily to the immediate-release formulation of bupropion at 100 mg three times daily, peak plasma concentrations of bupropion at steady state for bupropion hydrochloride extended-release tablets were approximately 85% of those achieved with the immediate-release formulation. There was equivalence for bupropion AUCs, as well as equivalence for both peak plasma concentration and AUCs for all three of the detectable bupropion metabolites. Thus, at steady state, bupropion hydrochloride extended-release tablets, given twice daily, and the immediate-release formulation of bupropion, given three times daily, are essentially bioequivalent for both bupropion and the three quantitatively important metabolites.

Absorption: Following oral administration of bupropion hydrochloride extended-release tablets to healthy volunteers, peak plasma concentrations of bupropion are achieved within 3 hours. Food increased C_{max} and AUC of bupropion by 11% and 17%, respectively, indicating that there is no clinically significant food effect.

Distribution: *In vitro* tests show that bupropion is 84% bound to human plasma proteins at concentrations up to 200 mcg/mL. The extent of protein binding of the hydroxybupropion metabolite is similar to that for bupropion, whereas the extent of protein binding of the threohydrobupropion metabolite is about half that seen with bupropion.

Metabolism: Bupropion is extensively metabolized in humans. Three metabolites have been shown to be active: hydroxybupropion, which is formed via hydroxylation of the *tert*-butyl group of bupropion, and the amino-alcohol isomers threohydrobupropion and erythrohydrobupropion, which are formed via reduction of the carbonyl group. *In vitro* findings suggest that cytochrome P4501B6 (CYP2B6) is the principal isoenzyme involved in the formation of hydroxybupropion, while cytochrome P450 isoenzymes are not involved in the formation of threohydrobupropion. Oxidation of the bupropion side chain results in the formation of a glycine conjugate of meta-chlorobenzoic acid, which is then excreted as the major urinary metabolite. The potency and toxicity of the metabolites relative to bupropion have not been fully characterized. However, it has been demonstrated in an antidepressant screening test in mice that hydroxybupropion is one half as potent as bupropion, while threohydrobupropion and erythrohydrobupropion are 5-fold less potent than bupropion. This may be of clinical importance because the plasma concentrations of the metabolites are as high or higher than those of bupropion.

Because bupropion is extensively metabolized, there is the potential for drug-drug interactions, particularly with those agents that are metabolized by the cytochrome P4501B6 (CYP2B6) isoenzyme. Although bupropion is not metabolized by cytochrome P4501D6 (CYP2D6), there is the potential for drug-drug interactions when bupropion is co-administered with drugs metabolized by this isoenzyme (see **PRECAUTIONS: Drug Interactions**).

Following a single dose in humans, peak plasma concentrations of hydroxybupropion occur approximately 6 hours after administration of bupropion hydrochloride extended-release tablets. Peak plasma concentrations of hydroxybupropion are approximately 10 times the peak level of the parent drug at steady state. The elimination half-life of hydroxybupropion is approximately 20 ($\pm$ 5) hours, and its AUC at steady state is about 17 times that of bupropion. The times to peak concentrations for the erythrohydrobupropion and threohydrobupropion metabolites are similar to that of the hydroxybupropion metabolite. However, their elimination half-lives are longer, 33 ($\pm$ 10) and 37 ($\pm$ 13) hours, respectively, and steady-state AUCs are 1.5 and 7 times that of bupropion, respectively. Bupropion and its metabolites exhibit linear kinetics following chronic administration of 300 to 450 mg/day.

Elimination: Following oral administration of 200 mg of ^{14}C -bupropion in humans, 87% and 10% of the radioactive dose were recovered in the urine and feces, respectively. However, the fraction of the oral dose of bupropion excreted unchanged was only 0.5%, a finding consistent with the extensive metabolism of bupropion.

Population Subgroups: Factors or conditions altering metabolic capacity (e.g., liver disease, congestive heart failure [CHF], age, concomitant medications, etc.) or elimination may be expected to influence the degree and extent of accumulation of the active metabolites of bupropion. The elimination of the major metabolites of bupropion may be affected by reduced renal or hepatic function because they are moderately polar compounds and are likely to undergo further metabolism or conjugation in the liver prior to urinary excretion.

Hepatic: The effect of hepatic impairment on the pharmacokinetics of bupropion was characterized in 2 single-dose studies, one in patients with alcoholic liver disease and one in patients with mild to severe cirrhosis. The first study showed that the half-life of hydroxybupropion was significantly longer in 8 patients with alcoholic liver disease than in 8 healthy volunteers (32 $\pm$ 14 hours versus 21 $\pm$ 5 hours, respectively). Although not statistically significant, the AUCs for bupropion and hydroxybupropion were more variable and tended to be greater (by 53% to 57%) in patients with alcoholic liver disease. The differences in half-life for bupropion and the other metabolites in the 2 patient groups were minimal.

The second study showed no statistically significant differences in the pharmacokinetics of bupropion and its active metabolites in 9 patients with mild to moderate hepatic cirrhosis compared to 8 healthy volunteers. However, more variability was observed in some of the pharmacokinetic parameters for bupropion (AUC , C_{max} , and T_{max}) and its active metabolites ($t_{1/2}$) in patients with mild to moderate hepatic cirrhosis. In addition, in patients with severe hepatic cirrhosis, the bupropion C_{max} and AUC were substantially increased

(mean difference: by approximately 70% and 3-fold, respectively) and more variable when compared to values in healthy volunteers; the mean bupropion half-life was also longer (29 hours in patients with severe hepatic cirrhosis vs. 19 hours in healthy subjects). For the metabolite hydroxybupropion, the mean C_{max} was approximately 69% lower. For the combined amino-alcohol isomers threohydrobupropion and erythrohydrobupropion, the mean C_{max} was approximately 31% lower. The mean AUC increased by about 1 1/2-fold for hydroxybupropion to about 2 1/2-fold for threohydrobupropion. The median T_{max} was observed 19 hours later for hydroxybupropion and 31 hours later for threohydrobupropion. The mean half-lives for hydroxybupropion and threohydrobupropion were increased 5- and 2-fold, respectively, in patients with severe hepatic cirrhosis compared to healthy volunteers (see **WARNINGS, PRECAUTIONS, and DOSAGE AND ADMINISTRATION**).

Renal: The effect of renal disease on the pharmacokinetics of bupropion has not been studied. The elimination of the major metabolites of bupropion may be affected by reduced renal function.

Left Ventricular Dysfunction: During a chronic dosing study with bupropion in 14 depressed patients with left ventricular dysfunction (history of CHF or an enlarged heart on x-ray), no apparent effect on the pharmacokinetics of bupropion or its metabolites was revealed, compared to healthy normal volunteers.

Age: The effects of age on the pharmacokinetics of bupropion and its metabolites have not been fully characterized, but an exploration of steady-state bupropion concentrations from several depression efficacy studies involving patients dosed in a range of 300 to 750 mg/day, on a three times daily schedule, revealed no relationship between age (18 to 83 years) and plasma concentration of bupropion. A single-dose pharmacokinetic study demonstrated that the disposition of bupropion and its metabolites in elderly subjects was similar to that of younger subjects. These data suggest there is no prominent effect of age on bupropion concentration; however, another pharmacokinetic study, single and multiple dose, has suggested that the elderly are at risk for accumulation of bupropion and its metabolites (see **PRECAUTIONS: Geriatric Use**).

Gender: A single-dose study involving 12 healthy male and 12 healthy female volunteers revealed no sex-related differences in the pharmacokinetic parameters of bupropion.

Smokers: The effects of cigarette smoking on the pharmacokinetics of bupropion were studied in 34 healthy male and female volunteers; 17 were chronic cigarette smokers and 17 were nonsmokers. Following oral administration of a single 150-mg dose of bupropion, there was no statistically significant difference in C_{max} , half-life, t_{max} , AUC, or clearance of bupropion or its active metabolites between smokers and nonsmokers.

CLINICAL TRIALS

The efficacy of the immediate-release formulation of bupropion as a treatment for depression was established in two 4-week, placebo-controlled trials in adult inpatients with depression and in one 6-week, placebo-controlled trial in adult outpatients with depression. In the first study, patients were titrated in a bupropion dose range of 300 to 600 mg/day on a three times daily schedule; 78% of patients received maximum doses of 450 mg/day or less. This trial demonstrated the effectiveness of the immediate-release formulation of bupropion on the Hamilton Depression Rating Scale (HDRS) total score, the depressed mood item (item 1) from that scale, and the Clinical Global Impressions (CGI) severity score. A second study included two fixed doses of the immediate-release formulation of bupropion (300 and 450 mg/day) and placebo. This trial demonstrated the effectiveness of the immediate-release formulation of bupropion, but only at the 450-mg/day dose; the results were positive for the HDRS total score and the CGI severity score, but not for HDRS item 1. In the third study, outpatients received 300 mg/day of the immediate-release formulation of bupropion. This study demonstrated the effectiveness of the immediate-release formulation of bupropion on the HDRS total score, HDRS item 1, the Montgomery-Asberg Depression Rating Scale, the CGI severity score, and the CGI improvement score. Although there are not as yet independent trials demonstrating the antidepressant effectiveness of the extended-release formulation of bupropion, studies have demonstrated the bioequivalence of the immediate-release and extended-release forms of bupropion under steady-state conditions, i.e., bupropion extended-release 150 mg twice daily was shown to be bioequivalent to 100 mg three times daily of the immediate-release formulation of bupropion, with regard to both rate and extent of absorption, for parent drug and metabolites.

INDICATIONS AND USAGE

Bupropion hydrochloride extended-release tablets are indicated for the treatment of depression.

The efficacy of bupropion in the treatment of depression was established in two 4-week controlled trials of depressed inpatients and in one 6-week controlled trial of depressed outpatients whose diagnoses corresponded most closely to the Major Depression category of the APA Diagnostic and Statistical Manual (DSM) (see **CLINICAL PHARMACOLOGY**).

A major depressive episode (DSM-IV) implies the presence of 1) depressed mood or 2) loss of interest or pleasure; in addition, at least five of the following symptoms have been present during the same 2-week period and represent a change from previous functioning: depressed mood, markedly diminished interest or pleasure in usual activities, significant change in weight and/or appetite, insomnia or hypersomnia, psychomotor agitation or retardation, increased fatigue, feelings of guilt or worthlessness, slowed thinking or impaired concentration, a suicide attempt or suicidal ideation.

The physician who elects to use bupropion hydrochloride extended-release tablets for extended periods should periodically reevaluate the long-term usefulness of the drug for the individual patient.

CONTRAINDICATIONS

Bupropion hydrochloride extended-release tablets are contraindicated in patients with a seizure disorder.

Bupropion hydrochloride extended-release tablets are contraindicated in patients treated with ZYBAN® (bupropion hydrochloride) Sustained-Release Tablets, or any other medications that contain bupropion because the incidence of seizure is dose dependent.

Bupropion hydrochloride extended-release tablets are contraindicated in patients with a current or prior diagnosis of bulimia or anorexia nervosa because of a higher incidence of seizures noted in patients treated for bulimia with the immediate-release formulation of bupropion. Bupropion hydrochloride extended-release tablets are contraindicated in patients undergoing abrupt discontinuation of alcohol or sedatives (including benzodiazepines).

The concurrent administration of bupropion hydrochloride extended-release tablets and a monoamine oxidase (MAO) inhibitor is contraindicated. At least 14 days should elapse between discontinuation of an MAO inhibitor and initiation of treatment with bupropion hydrochloride extended-release tablets.

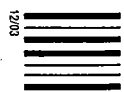
Bupropion hydrochloride extended-release tablets are contraindicated in patients who have shown an allergic response to bupropion or the other ingredients that make up bupropion hydrochloride extended-release tablets.

WARNINGS

Patients should be made aware that bupropion hydrochloride extended-release tablets contains the same active ingredient found in ZYBAN, used as an aid to smoking cessation treatment, and that bupropion hydrochloride extended-release tablets should not be used in combination with ZYBAN, or any other medications that contain bupropion.

Seizures: Bupropion is associated with a dose-related risk of seizures. The risk of seizures is also related to patient factors, clinical situations, and concomitant medications, which must be considered in selection of patients for therapy with bupropion hydrochloride extended-release tablets. Bupropion hydrochloride extended-release tablets should be discontinued and not restarted in patients who experience a seizure while on treatment.

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Bupropion HCl
Extended-Release
Tablets

• **Dose:** At doses of bupropion hydrochloride extended-release tablets up to a dose of 300 mg/day, the incidence of seizure is approximately 0.1% (1/1000) and increases to approximately 0.4% (4/1000) at the maximum recommended dose of 400 mg/day. Data for the immediate-release formulation of bupropion revealed a seizure incidence of approximately 0.4% (i.e., 13 of 3200 patients followed prospectively) in patients treated at doses in a range of 300 to 450 mg/day. The 450 mg/day upper limit of this dose range is close to the currently recommended maximum dose of 400 mg/day for bupropion hydrochloride extended-release tablets. This seizure incidence (0.4%) may exceed that of other marketed antidepressants and bupropion hydrochloride extended-release tablets up to 300 mg/day by as much as fourfold. This relative risk is only an approximate estimate because no direct comparative studies have been conducted.

Additional data accumulated for the immediate-release formulation of bupropion suggested that the estimated seizure incidence increases almost tenfold between 450 and 600 mg/day, which is twice the usual adult dose and one and one-half the maximum recommended daily dose (400 mg) of bupropion hydrochloride extended-release tablets. This disproportionate increase in seizure incidence with dose incrementation calls for caution in dosing.

Data for bupropion hydrochloride extended-release tablets revealed a seizure incidence of approximately 0.1% (i.e., 3 of 3100 patients followed prospectively) in patients treated at doses in a range of 100 to 300 mg/day. It is not possible to know if the lower seizure incidence observed in this study involving the extended-release formulation of bupropion resulted from the different formulation or the lower dose used. However, as noted above, the immediate-release and extended-release formulations are bioequivalent with regard to both rate and extent of absorption during steady state (the most pertinent condition to estimating seizure incidence), since most observed seizure occur under steady-state conditions.

• **Patient factors:** Predisposing factors that may increase the risk of seizure with bupropion use include history of head trauma or prior seizure, central nervous system (CNS) tumor, the presence of severe hepatic cirrhosis, and concomitant medications that lower seizure threshold.

• **Clinical Situations:** Circumstances associated with an increased seizure risk include, among others, excessive use of alcohol or sedatives (including benzodiazepines); addition to opiates, cocaine, or stimulants, use of over-the-counter stimulants and anorectics; and diabetes treated with oral hypoglycemics or insulin.

• **Concomitant Medications:** Many medications (e.g., antipsychotics, antidepressants, theophylline, systemic steroids) are known to lower seizure threshold.

Recommendations for Reducing the Risk of Seizure: Retrospective analysis of clinical experience gained during the development of bupropion suggests that the risk of seizure may be minimized if

- the total daily dose of bupropion hydrochloride extended-release tablets does not exceed 400 mg,
- the daily dose is administered twice daily, and
- the rate of incrementation of dose is gradual.
- No single dose should exceed 200 mg to avoid high peak concentrations of bupropion and/or its metabolites.
- Bupropion hydrochloride extended-release tablets should be administered with extreme caution to patients with a history of seizure, cranial trauma, or other predisposition(s) toward seizure, or patients treated with other agents (e.g., antipsychotics, other antidepressants, theophylline, systemic steroids, etc.) that lower seizure threshold.

Hepatic Impairment: Bupropion hydrochloride extended-release should be used with extreme caution in patients with severe hepatic cirrhosis. In these patients a reduced frequency and/or dose is required, as peak bupropion, as well as AUC levels are substantially increased and accumulation is likely to occur in such patients to a greater extent than usual. The dose should not exceed 100 mg every day or 150 mg every other day in these patients (see **CLINICAL PHARMACOLOGY, PRECAUTIONS, and DOSAGE AND ADMINISTRATION**).

Potential for Hepatotoxicity: In rats receiving large doses of bupropion chronically, there was an increase in incidence of hepatic hyperplastic nodules and hepatocellular hypertrophy. In dogs receiving large doses of bupropion chronically, various histologic changes were seen in the liver, and laboratory tests suggesting mild hepatocellular injury were noted.

PRECAUTIONS

General: Agitation and Insomnia: Patients in placebo-controlled trials with bupropion hydrochloride extended-release tablets experienced agitation, anxiety, and insomnia as shown in Table 1.

Table 1: Incidence of Agitation, Anxiety, and Insomnia in Placebo-Controlled Trials

Adverse Event Term	Bupropion Hydrochloride Extended-Release Tablets 300 mg/day (n = 376)	Bupropion Hydrochloride Extended-Release Tablets 400 mg/day (n = 114)	Placebo (n = 385)
Agitation	3%	9%	2%
Anxiety	5%	6%	3%
Insomnia	11%	16%	6%

In clinical studies, these symptoms were sometimes of sufficient magnitude to require treatment with sedative/hypnotic drugs.

Symptoms were sufficiently severe to require discontinuation of treatment in 1% and 2.6% of patients treated with 300 and 400 mg/day, respectively, of bupropion hydrochloride extended-release tablets and 0.8% of patients treated with placebo.

Psychosis, Confusion, and Other Neuropsychiatric Phenomena: Depressed patients treated with an immediate-release formulation of bupropion or with bupropion hydrochloride extended-release tablets have been reported to show a variety of neuropsychiatric signs and symptoms, including delusions, hallucinations, psychosis, concentration disturbance, paranoia, and confusion. In some cases, these symptoms abated upon dose reduction and/or withdrawal of treatment.

Activation of Psychosis and/or Mania: Antidepressants can precipitate manic episodes in bipolar disorder patients during the depressed phase of their illness and may activate latent psychosis in other susceptible patients. Bupropion hydrochloride extended-release tablets are expected to pose similar risks.

Altered Appetite and Weight: In placebo-controlled studies, patients experienced weight gain or weight loss as shown in Table 2.

Table 2: Incidence of Weight Gain and Weight Loss in Placebo-Controlled Trials

Weight Change	Bupropion Hydrochloride Extended-Release Tablets 300 mg/day (n = 339)	Bupropion Hydrochloride Extended-Release Tablets 400 mg/day (n = 112)	Placebo (n = 347)
Gained >5 lbs	3%	2%	4%
Lost >5 lbs	14%	19%	6%

In studies conducted with the immediate-release formulation of bupropion, 35% of patients receiving tricyclic antidepressants gained weight, compared to 9% of patients treated with the immediate-release formulation of bupropion. If weight loss is a major presenting sign of a patient's depressive illness, the anorectic and/or weight-reducing potential of bupropion hydrochloride extended-release tablets should be considered.

Suicide: The possibility of a suicide attempt is inherent in depression and may persist until significant remission occurs. Accordingly, prescriptions for bupropion hydrochloride extended-release tablets should be written for the smallest number of tablets consistent with good patient management.

Allergic Reactions: Anaphylactoid/anaphylactic reactions characterized by symptoms such as pruritus, urticaria, angioedema, and dyspnea requiring medical treatment have been reported in clinical trials with bupropion. In addition, there have been rare spontaneous postmarketing reports of erythema multiforme, Stevens-Johnson syndrome, and anaphylactic shock associated with bupropion. A patient should stop taking bupropion hydrochloride extended-release tablets and consult a doctor if experiencing allergic or anaphylactoid/anaphylactic reactions (e.g., skin rash, pruritus, hives, chest pain, edema, and shortness of breath) during treatment.

Arthralgia, myalgia, and fever with rash and other symptoms suggestive of delayed hypersensitivity have been reported in association with bupropion. These symptoms may resemble serum sickness.

Cardiovascular Effects: In clinical practice, hypertension, in some cases severe, requiring acute treatment, has been reported in patients receiving bupropion alone and in combination with nicotine replacement therapy. These events have been observed in both patients with and without evidence of preexisting hypertension.

Data from a comparative study of the extended-release formulation of bupropion (Zyban® Sustained-Release Tablets), nicotine transdermal system (NTS), the combination of extended-release bupropion plus NTS, and placebo as an aid to smoking cessation suggest a higher incidence of treatment-emergent hypertension in patients treated with the combination of extended-release bupropion and NTS. In this study, 6.1% of patients treated with the combination of extended-release bupropion and NTS had treatment-emergent hypertension compared to 2.5%, 1.6%, and 3.1% of patients treated with extended-release bupropion, NTS, and placebo, respectively. The majority of these patients had evidence of preexisting hypertension. Three patients (1.2%) treated with the combination of Zyban and NTS and one patient (0.4%) treated with NTS had study medication discontinued due to hypertension compared to none of the patients treated with Zyban or placebo. Monitoring of blood pressure is recommended in patients who receive the combination of bupropion and nicotine replacement.

There is no clinical experience establishing the safety of bupropion hydrochloride extended-release tablets in patients with a recent history of myocardial infarction or unstable heart disease. Therefore, care should be exercised if it is used in these groups. Bupropion was well tolerated in depressed patients who had previously developed orthostatic hypotension while receiving tricyclic antidepressants, and was also generally well tolerated in a group of 36 depressed inpatients with stable congestive heart failure (CHF). However, bupropion was associated with a rise in supine blood pressure in the study of patients with CHF, resulting in discontinuation of treatment in two patients for exacerbation of baseline hypertension.

Hepatic Impairment: Bupropion hydrochloride extended-release should be used with extreme caution in patients with severe hepatic cirrhosis. In these patients, a reduced frequency and/or dose is required. Bupropion hydrochloride extended-release should be used with caution in patients with hepatic impairment (including mild to moderate hepatic cirrhosis) and reduced frequency and/or dose should be considered in patients with mild to moderate hepatic cirrhosis.

All patients with hepatic impairment should be closely monitored for possible adverse effects that could indicate high drug and metabolite levels (see **CLINICAL PHARMACOLOGY, WARNINGS, and DOSAGE AND ADMINISTRATION**).

Renal Impairment: No studies have been conducted in patients with renal impairment. Bupropion is extensively metabolized in the liver to active metabolites, which are further metabolized and subsequently excreted by the kidneys. Bupropion hydrochloride extended-release should be used with caution in patients with renal impairment and a reduced frequency and/or dose should be considered as bupropion and its metabolites may accumulate in such patients to a greater extent than usual. The patient should be closely monitored for possible adverse effects that could indicate high drug or metabolite levels.

Information for Patients: Patients should be made aware that bupropion hydrochloride extended-release tablets contains the same active ingredient found in ZYBAN, used as an aid to smoking cessation treatment, and that bupropion hydrochloride extended-release tablets should not be used in combination with ZYBAN or any other medications that contain bupropion hydrochloride.

Physicians are advised to discuss the following issues with patients:

As dose is increased during initial titration to doses above 150 mg/day, patients should be instructed to take bupropion hydrochloride extended-release tablets in two divided doses, preferably with at least 8 hours between successive doses, to minimize the risk of seizures. Patients should be told that bupropion hydrochloride extended-release tablets should be discontinued and not restarted if they experience a seizure while on treatment.

Patients should be told that any CNS-active drug like bupropion hydrochloride extended-release tablets may impair their ability to perform tasks requiring judgment or motor and cognitive skills. Consequently, until they are reasonably certain that bupropion hydrochloride extended-release tablets do not adversely affect their performance, they should refrain from driving an automobile or operating complex, hazardous machinery.

Patients should be told that the excessive use or abrupt discontinuation of alcohol or sedatives (including benzodiazepines) may alter the seizure threshold. Some patients have reported lower alcohol tolerance during treatment with bupropion hydrochloride extended-release tablets. Patients should be advised that the consumption of alcohol should be minimized or avoided.

Patients should be advised to inform their physicians if they are taking or plan to take any prescription or over-the-counter drugs. Concern is warranted because bupropion hydrochloride extended-release tablets and other drugs may affect each other's metabolism.

Patients should be advised to notify their physicians if they become pregnant or intend to become pregnant during therapy.

Patients should be advised to swallow bupropion hydrochloride extended-release tablets whole so that the release rate is not altered. Do not chew, divide, or crush tablets.

Laboratory Tests: There are no specific laboratory tests recommended.

Drug Interactions: Few systemic data have been collected on the metabolism of bupropion hydrochloride extended-release tablets following concomitant administration with other drugs or, alternatively, the effect of concomitant administration of bupropion hydrochloride extended-release tablets on the metabolism of other drugs.

Because bupropion is extensively metabolized, the coadministration of other drugs may affect its clinical activity. *In vitro* studies indicate that bupropion is primarily metabolized to hydroxybupropion by the CYP2B6 isoenzyme. Therefore, the potential exists for a drug interaction between bupropion hydrochloride extended-release tablets and drugs that affect the CYP2B6 isoenzyme (e.g., orphenadrine and cyclophosphamide). The threehydrobupropion metabolite of bupropion does not appear to be produced by the cytochrome P450 isoenzymes. The effects of concomitant administration of cimetidine on the pharmacokinetics of bupropion and its active metabolites were studied in 24 healthy young male volunteers. Following oral administration of two 150 mg bupropion hydrochloride extended-release tablets with and without 800 mg of cimetidine, the pharmacokinetics of bupropion and hydroxybupropion were unaffected. However, there were 16% and 32% increases in the AUC and C_{max} , respectively, of the combined moieties of threehydrobupropion and erythrohydrobupropion.

While not systematically studied, certain drugs may induce the metabolism of bupropion (e.g., carbamazepine, phenobarbital, phenytoin).

Animal data indicated that bupropion may be an inducer of drug-metabolizing enzymes in humans. In one study, following chronic administration of bupropion, 100 mg three times daily to eight healthy male volunteers for 14 days, there was no evidence of induction of its own metabolism. Nevertheless, there may be the potential for clinically important alterations of blood levels of coadministered drugs.

Drugs Metabolized by Cytochrome P4501D6 (CYP2D6): Many drugs, including most antidepressants (SSRIs, many tricyclics), beta-blockers, antiarrhythmics, and antipsychotics are metabolized by the CYP2D6 isoenzyme. Although bupropion is not metabolized by this isoenzyme, bupropion and hydroxybupropion are inhibitors of CYP2D6 isoenzyme *in vitro*. In a study of 15 male subjects (ages 19 to 35 years) who were extensive metabolizers of the CYP2D6 isoenzyme, daily doses of bupropion given as 150 mg twice daily followed by a single dose of 50 mg desipramine increased the C_{max} , AUC, and $t_{1/2}$ of desipramine by an average of approximately two-, five- and two-fold, respectively. The effect was present for at least 7 days after the last dose of bupropion. Concomitant use of bupropion with other drugs metabolized by CYP2D6 has not been formally studied.

Therefore, coadministration of bupropion with drugs that are metabolized by CYP2D6 isoenzyme including certain antidepressants (e.g., nortriptyline, imipramine, desipramine, paroxetine, fluoxetine, sertraline), antipsychotics (e.g., haloperidol, risperidone, thioridazine), beta-blockers (e.g., metoprolol), and type 1C antiarrhythmics (e.g., propafenone, flecainide), should be approached with caution and should be initiated at the lower end of the dose range of the concomitant medication. If bupropion is added to the treatment regimen of a patient already receiving a drug metabolized by CYP2D6, the need to decrease the dose of the original medication should be considered, particularly for those concomitant medications with a narrow therapeutic index.

MAO Inhibitors: Studies in animals demonstrate that the acute toxicity of bupropion is enhanced by the MAO inhibitor phenelzine (see **CONTRAINDICATIONS**).

Levodopa and Amantadine: Limited clinical data suggest a higher incidence or adverse experiences in patients receiving bupropion concurrently with either levodopa or amantadine. Administration of bupropion hydrochloride extended-release tablets to patients receiving either levodopa or amantadine concurrently should be undertaken with caution, using small initial doses and gradual dose increases.

Drugs that Lower Seizure Threshold: Concurrent administration of bupropion hydrochloride extended-release tablets and agents (e.g., antipsychotics, other antidepressants, theophylline, systemic steroids, etc.) that lower seizure threshold should be undertaken only with extreme caution (see **WARNINGS**). Low initial dosing and gradual dose increases should be employed.

Nicotine Transdermal System: (see **PRECAUTIONS: Cardiovascular Effects**)

Carcinogenesis, Mutagenesis, Impairment of Fertility: Lifetime carcinogenicity studies were performed in rats and mice at doses up to 300 and 150 mg/kg per day, respectively. These doses are approximately seven and two times the maximum recommended human dose (MRHD), respectively, on a mg/m² basis. In the rat study there was an increase in nodular proliferative lesions of the liver at doses of 100 to 300 mg/kg per day (approximately two to seven times the MRHD on a mg/m² basis); lower doses were not tested. The question of whether or not such lesions may be precursors of neoplasms of the liver is currently unresolved. Similar liver lesions were not seen in the mouse study, and no increase in malignant tumors of the liver and other organs was seen in either study.

Bupropion produced a positive response (two to three times control mutation rate) in two of five strains in the Ames bacterial mutagenicity test and an increase in chromosomal aberrations in one of three *in vivo* rat bone marrow cytogenetic studies.

A fertility study in rats at doses up to 300 mg/kg revealed no evidence of impaired fertility.

Pregnancy: Teratogenic Effects: Pregnancy Category B. Teratology studies have been performed at doses up to 450 mg/kg in rats, and at doses up to 150 mg/kg in rabbits (approximately 7 to 11 and 7 times the MRHD, respectively, on a mg/m² basis), and have revealed no evidence of harm to the fetus due to bupropion. There are no adequate and well-controlled studies in pregnant women. Because animal reproduction studies are not always predictive of human response, this drug should be used during pregnancy only if clearly needed.

Labor and Delivery: The effect of bupropion hydrochloride extended-release tablets on labor and delivery in humans is unknown.

Nursing Mothers: Like many other drugs, bupropion and its metabolites are secreted in human milk. Because of the potential for serious adverse reactions in nursing infants from bupropion hydrochloride extended-release tablets, a decision should be made whether to discontinue nursing or to discontinue the drug, taking into account the importance of the drug to the mother.

Pediatric Use: The safety and effectiveness of bupropion hydrochloride extended-release tablets in pediatric patients below 18 years old have not been established. The immediate-release formulation of bupropion was studied in 104 pediatric patients (age range, 6 to 16) in clinical trials of the drug for other indications. Although generally well tolerated, the limited exposure is insufficient to assess the safety of bupropion in pediatric patients.

Geriatric Use: Of the approximately 6000 patients who participated in clinical trials with bupropion extended-release tablets (depression and smoking cessation studies), 275 were 65 and over and 47 were 75 and over. In addition, several hundred patients 65 and over participated in clinical trials using the immediate-release formulation of bupropion (depression studies). No overall differences in safety or effectiveness were observed between these subjects and younger subjects, and other reported clinical experience has not identified differences in responses between the elderly and younger patients, but greater sensitivity of some older individuals cannot be ruled out.

A single-dose pharmacokinetic study demonstrated that the disposition of bupropion and its metabolites in elderly subjects was similar to that of younger subjects; however, another pharmacokinetic study, single and multiple dose, has suggested that the elderly are at increased risk for accumulation of bupropion and its metabolites (see **CLINICAL PHARMACOLOGY**).

Bupropion is extensively metabolized in the liver to active metabolites, which are further metabolized and excreted by the kidneys. The risk of toxic reaction to this drug may be greater in patients with impaired renal function. Because elderly patients are more likely to have decreased renal function, care should be taken in dose selection, and it may be useful to monitor renal function. (see **PRECAUTIONS: Renal Impairment and DOSAGE AND ADMINISTRATION**).

ADVERSE REACTIONS

(See also **WARNINGS and PRECAUTIONS**)

The information included under the Incidence in Controlled Trials subsection of ADVERSE REACTIONS is based primarily on data from controlled clinical trials with bupropion hydrochloride extended-release tablets. Information on additional adverse events associated with the extended-release formulation of bupropion in smoking cessation trials, as well as the immediate-release formulation of bupropion, is included in a separate section (see Other Events Observed During the Clinical Development and Postmarketing Experience of Bupropion).

Incidence in Controlled Trials With bupropion hydrochloride extended-release tablets: Adverse Events Associated With Discontinuation of Treatment Among Patients Treated With Bupropion Hydrochloride Extended-Release Tablets: In placebo-controlled clinical trials, 9% and 11% of patients treated with 300 and 400 mg/day, respectively, of bupropion hydrochloride extended-release tablets and 4% of patients treated with placebo discontinued treatment due to adverse events. The specific adverse events in these trials that led to discontinuation in at least 1% of patients treated with either 300 or 400 mg/day of bupropion hydrochloride extended-release tablets and at a rate at least twice the placebo rate are listed in Table 3.

Table 3: Treatment Discontinuation Due to Adverse Events in Placebo-Controlled Trials

Adverse Event Term	Bupropion Hydrochloride Extended-Release Tablets 300 mg/day (n = 376)	Bupropion Hydrochloride Extended-Release Tablets 400 mg/day (n = 114)	Placebo (n = 385)
Rash	2.4%	0.9%	0.0%
Nausea	0.8%	1.8%	0.3%
Agitation	0.3%	1.8%	0.3%
Migraine	0.0%	1.8%	0.3%

Adverse Events Occurring at an Incidence of 1% or More Among Patients Treated With Bupropion Hydrochloride Extended-Release Tablets: Table 4 enumerates treatment-emergent adverse events that occurred among patients treated with 300 and 400 mg/day of bupropion hydrochloride extended-release tablets and with placebo in placebo-controlled trials. Events that occurred in either the 300 or 400 mg/day group at an incidence of 1% or more and were more frequent than in the placebo group are included. Reported adverse events were classified using a COSTART-based Dictionary.

Accurate estimates of the incidence of adverse events associated with the use of any drug are difficult to obtain. Estimates are influenced by drug dose, detection technique, setting, physician judgments, etc. The figures cited cannot be used to predict precisely the incidence of untoward events in the course of usual medical practice where patient characteristics and other factors differ from those that prevailed in the clinical trials. These incidence figures also cannot be compared with those obtained from other clinical studies involving related drug products as each group of drug trials is conducted under a different set of conditions.

Finally, it is important to emphasize that the tabulation does not reflect the relative severity and/or clinical importance of the events. A better perspective on the serious adverse events associated with the use of bupropion hydrochloride extended-release tablets is provided in the **WARNINGS and PRECAUTIONS** sections.

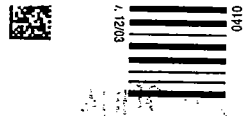
Table 4: Treatment-Emergent Adverse Events in Placebo-Controlled Trials*

Body System/Adverse Event	Bupropion Hydrochloride Extended-Release Tablets 300 mg/day (n = 376)	Bupropion Hydrochloride Extended-Release Tablets 400 mg/day (n = 114)	Placebo (n = 385)
Body (General)			
Headache	26%	25%	23%
Infection	8%	9%	6%
Abdominal pain	3%	9%	2%
Asthenia	2%	4%	2%
Chest pain	3%	4%	1%
Pain	2%	3%	2%
Fever	1%	2%	-
Cardiovascular			
Palpitation	2%	6%	2%
Flushing	1%	4%	-
Migraine	1%	4%	1%
Hot flashes	1%	3%	1%
Digestive			
Dry mouth	17%	24%	7%
Nausea	13%	18%	8%
Constipation	10%	5%	7%
Diarrhea	5%	7%	6%
Anorexia	5%	3%	2%
Vomiting	4%	2%	2%
Dysphagia	0%	2%	0%
Musculoskeletal			
Myalgia	2%	6%	3%
Arthralgia	1%	4%	1%
Arthritis	0%	2%	0%
Twitch	1%	2%	-
Nervous system			
Insomnia	11%	16%	6%
Dizziness	7%	11%	5%
Agitation	3%	9%	2%
Anxiety	5%	6%	3%
Tremor	6%	3%	1%
Nervousness	5%	3%	3%
Somnolence	2%	3%	2%
Irritability	3%	2%	2%
Memory decreased	-	3%	1%
Paresthesia	1%	2%	1%
Central nervous system stimulation	2%	1%	1%
Respiratory			
Pharyngitis	3%	11%	2%
Sinusitis	3%	1%	2%
Increased cough	1%	2%	1%
Skin			
Sweating	6%	5%	2%
Rash	5%	4%	1%
Pruritus	2%	4%	2%
Urticaria	2%	1%	0%
Special senses			
Tinnitus	6%	6%	2%
Taste perversion	2%	4%	-
Amblyopia	3%	2%	2%
Urogenital			
Urinary frequency	2%	5%	2%
Urinary urgency	-	2%	0%
Vaginal hemorrhage †	0%	2%	-
Urinary tract infection	1%	0%	-

* Adverse events that occurred in at least 1% of patients treated with either 300 or 400 mg/day of bupropion hydrochloride extended-release tablets, but equally or more frequently in the placebo group, were: abnormal dreams, accidental injury, acne, appetite increased, back pain, bronchitis, dysmenorrhea, dyspepsia, flatulence, flu syndrome, hypertension, neck pain, respiratory disorder, rhinitis, and tooth disorder.

† Incidence based on the number of female patients.

- Hyphen denotes adverse events occurring in greater than 0 but less than 0.5% of patients.



Bupropion HCl
Extended-Release
Tablets
Rx only

Incidence of Commonly Observed Adverse Events in Controlled Clinical Trials: Adverse events from Table 4 occurring in at least 5% of patients treated with bupropion hydrochloride extended-release tablets and at a rate at least twice the placebo rate are listed below for the 300- and 400-mg/day dose groups.

Bupropion hydrochloride extended-release tablets 300 mg/day: Anorexia, dry mouth, rash, sweating, tinnitus, and tremor.

Bupropion hydrochloride extended-release tablets 400 mg/day: Abdominal pain, agitation, anxiety, dizziness, dry mouth, insomnia, myalgia, nausea, palpitation, pharyngitis, sweating, tinnitus, and urinary frequency.

Other Events Observed During the Clinical Development and Postmarketing Experience of Bupropion: In addition to the adverse events noted above, the following events have been reported in clinical trials and postmarketing experience with the extended-release formulation of bupropion in depressed patients and in nondepressed smokers, as well as in clinical trials and postmarketing clinical experience with the immediate-release formulation of bupropion.

Adverse events for which frequencies are provided below occurred in clinical trials with the extended-release formulation of bupropion. The frequencies represent the proportion of patients who experienced a treatment-emergent adverse event on at least one occasion in placebo-controlled studies for depression (n = 987) or smoking cessation (n = 1013), or patients who experienced an adverse event requiring discontinuation of treatment in an open-label surveillance study with bupropion hydrochloride extended-release tablets (n = 3100). All treatment-emergent adverse events are included except those listed in Tables 1 through 4, those events listed in other safety-related sections, those adverse events subsumed under COSTART terms that are either overly general or excessively specific so as to be uninformative, those events not reasonably associated with the use of the drug, and those events that were not serious and occurred in fewer than two patients. Events of major clinical importance are described in the **WARNINGS** and **PRECAUTIONS** sections of the labeling.

Events are further categorized by body system and listed in order of decreasing frequency according to the following definitions of frequency: Frequent adverse events are defined as those occurring in at least 1/100 patients. Infrequent adverse events are those occurring in 1/100 to 1/1000 patients, while rare events are those occurring in less than 1/1000 patients.

Adverse events for which frequencies are not provided occurred in clinical trials or postmarketing experience with bupropion. Only those adverse events not previously listed for extended-release bupropion are included. The extent to which these events may be associated with bupropion hydrochloride extended-release tablets are unknown.

Body (General): Infrequent were chills, facial edema, musculoskeletal chest pain, and photosensitivity. Rare was malaise. Also observed were arthralgia, myalgia, and fever with rash and other symptoms suggestive of delayed hypersensitivity. These symptoms may resemble serum sickness (see **PRECAUTIONS**).

Cardiovascular: Infrequent were postural hypotension, stroke, tachycardia, and vasodilation. Rare was syncope. Also observed were complete atrioventricular block, extrasystoles, hypotension, hypertension (in some cases severe, see **PRECAUTIONS**), myocardial infarction, phlebitis, and pulmonary embolism.

Digestive: Infrequent were abnormal liver function, bruxism, gastric reflux, gingivitis, glossitis, increased salivation, jaundice, mouth ulcers, stomatitis, and thirst. Rare was edema of tongue. Also observed were colitis, esophagitis, gastrointestinal hemorrhage, gum hemorrhage, hepatitis, intestinal perforation, liver damage, pancreatitis, and stomach ulcer.

Endocrine: Also observed were hyperglycemia, hypoglycemia, and syndrome of inappropriate antidiuretic hormone.

Hemic and Lymphatic: Infrequent was ecchymosis. Also observed were anemia, leukocytosis, leukopenia, lymphadenopathy, pancytopenia, and thrombocytopenia. Altered PT and/or INR, infrequently associated with hemorrhagic or thrombotic complications, were observed when bupropion was coadministered with warfarin.

Metabolic and Nutritional: Infrequent were edema and peripheral edema. Also observed was glycosuria.

Musculoskeletal: Infrequent were leg cramps. Also observed were muscle rigidity/fever/rhabdomyolysis and muscle weakness.

Nervous System: Infrequent were abnormal coordination, decreased libido, depersonalization, dysphoria, emotional lability, hallucinations, hostility, hyperkinesia, hypertonia, hypesthesia, suicidal ideation, and vertigo. Rare were amnesia, ataxia, derealization, and hypomania. Also observed were abnormal electroencephalogram (EEG), akinesia, aphasia, coma, delirium, dysarthria, dyskinesia, dystonia, euphoria, extrapyramidal syndrome, hypokinesia, increased libido, manic reaction, neuralgia, neuropathy, paranoid reaction, and unmasking tardive dyskinesia.

Respiratory: Rare was bronchospasm. Also observed was pneumonia.

Skin: Rare was maculopapular rash. Also observed were alopecia, angioedema, exfoliative dermatitis, and hirsutism.

Special Senses: Infrequent were accommodation abnormality and dry eye. Also observed were deafness, diplopia, and mydriasis.

Urogenital: Infrequent were impotence, polyuria, and prostate disorder. Also observed were abnormal ejaculation, cystitis, dyspareunia, dysuria, gynecomastia, menopause, painful erection, salpingitis, urinary incontinence, urinary retention, and vaginitis.

DRUG ABUSE AND DEPENDENCE

Controlled Substance Class: Bupropion is not a controlled substance.

Humans: Controlled clinical studies of bupropion conducted in normal volunteers, in subjects with a history of multiple drug abuse, and in depressed patients showed some increase in motor activity and agitation/excitement.

In a population of individuals experienced with drugs of abuse, a single dose of 400 mg of bupropion produced mild amphetamine-like activity as compared to placebo on the Morphine-Benzodrine Subscale of the Addiction Research Center Inventories (ARCI), and a score intermediate between placebo and amphetamine on the Liking Scale of the ARCI. These scales measure general feelings of euphoria and drug desirability.

Findings in clinical trials, however, are not known to reliably predict the abuse potential of drugs. Nonetheless, evidence from single-dose studies does suggest that the recommended daily dosage of bupropion when administered in divided doses is not likely to be especially reinforcing to amphetamine or stimulant abusers. However, higher doses that could not be tested because of the risk of seizure might be modestly attractive to those who abuse stimulant drugs.

Animals: Studies in rodents and primates have shown that bupropion exhibits some pharmacologic actions common to psychostimulants. In rodents, it has been shown to increase locomotor activity, elicit a mild stereotyped behavioral response, and increase rates of responding in several schedule-controlled behavior paradigms. In primate models to assess the positive reinforcing effects of psychoactive drugs, bupropion was self-administered intravenously. In rats, bupropion produced amphetamine-like and cocaine-like discriminative stimulus effects in drug discrimination paradigms used to characterize the subjective effects of psychoactive drugs.

OVERDOSAGE

Human Overdose Experience: There has been very limited experience with overdose of bupropion hydrochloride extended-release tablets; three cases were reported during clinical trials. One patient ingested 3000 mg of bupropion hydrochloride extended-release tablets and vomited quickly after the overdose; the patient experienced blurred vision and lightheadedness. A second patient ingested a "handful" of bupropion hydrochloride extended-release tablets and experienced confusion, lethargy, nausea, jitteriness, and seizure. A third patient ingested 3600 mg of bupropion hydrochloride extended-release tablets and a bottle of wine; the patient experienced nausea, visual hallucinations, and "grogginess". None of the patients experienced further sequelae.

There has been extensive experience with overdosage of the immediate-release formulation of bupropion. Thirteen overdoses occurred during clinical trials. Twelve patients ingested 850 to 4200 mg and recovered without significant sequelae. Another patient who ingested 9000 mg of the immediate-release formulation of bupropion and 300 mg of tranylcypromine experienced a grand mal seizure and recovered without further sequelae.

Since introduction, overdoses of up to 17,500 mg of the immediate-release formulation of bupropion have been reported. Seizure was reported in approximately one third of all cases. Other serious reactions reported with overdoses of the immediate-release formulation of bupropion alone included hallucinations, loss of consciousness, and sinus tachycardia. Fever, muscle rigidity, rhabdomyolysis, hypotension, stupor, coma, and respiratory failure have been reported when the immediate-release formulation of bupropion was part of multiple drug overdoses.

Although most patients recovered without sequelae, death associated with overdoses of the immediate-release formulation of bupropion alone have been reported rarely in patients ingesting massive doses of the drug. Multiple uncontrolled seizures, bradycardia, cardiac failure, and cardiac arrest prior to death were reported in these patients.

Overdosage Management: Ensure an adequate airway, oxygenation, and ventilation. Monitor cardiac rhythm and vital signs. EEG monitoring is also recommended for the first 48 hours post-ingestion. General supportive and symptomatic measures are also recommended. Induction of emesis is not recommended. Gastric lavage with a large-bore orogastric tube with appropriate airway protection, if needed, may be indicated if performed soon after ingestion or in symptomatic patients.

Activated charcoal should be administered. There is no experience with the use of forced diuresis, dialysis, hemoperfusion, or exchange transfusion in the management of bupropion overdoses. No specific antidotes for bupropion are known.

Due to the dose-related risk of seizures with bupropion hydrochloride extended-release, hospitalization following suspected overdose should be considered. Based on studies in animals, it is recommended that seizures be treated with intravenous benzodiazepine administration and other supportive measures, as appropriate.

In managing overdosage, consider the possibility of multiple drug involvement. The physician should consider contacting a poison control center for additional information on the treatment of any overdose. Telephone numbers for certified poison control centers are listed in the *Physicians' Desk Reference* (PDR).

DOSAGE AND ADMINISTRATION

General Dosing Considerations: It is particularly important to administer bupropion hydrochloride extended-release tablets in a manner most likely to minimize the risk of seizure (see **WARNINGS**). Gradual escalation in dosage is also important if agitation, motor restlessness, and insomnia, often seen during the initial days of treatment, are to be minimized. If necessary, these effects may be managed by temporary reduction of dose or the short-term administration of an intermediate to long-acting sedative hypnotic. A sedative hypnotic usually is not required beyond the first week of treatment. Insomnia may also be minimized by avoiding bedtime doses. If distressing, untoward effects supervene, dose escalation should be stopped. Bupropion hydrochloride extended-release tablets should be swallowed whole and not crushed, divided, or chewed.

Initial Treatment: The usual adult target dose for bupropion hydrochloride extended-release tablets is 300 mg/day, given as 150 mg twice daily. Dosing with bupropion hydrochloride extended-release tablets should begin at 150-mg/day given as a single daily dose in the morning. If the 150-mg initial dose is adequately tolerated, an increase to the 300-mg/day target dose, given as 150 mg twice daily, may be made as early as day 4 of dosing. There should be an interval of at least 8 hours between successive doses.

Increasing the Dosage Above 300 mg/day: As with other antidepressants, the full antidepressant effect of bupropion hydrochloride extended-release tablets may not be evident until 4 weeks of treatment or longer. An increase in dosage to the maximum of 400 mg/day, given as 200 mg twice daily, may be considered for patients in whom no clinical improvement is noted after several weeks of treatment at 300 mg/day.

Maintenance: It is generally agreed that acute episodes of depression require several months or longer of sustained pharmacological therapy. Patients should be periodically reassessed to determine the need for maintenance treatment and the appropriate dose for such treatment.

Dosage Adjustment for Patients with Impaired Hepatic Function: Bupropion hydrochloride extended-release should be used with extreme caution in patients with severe hepatic cirrhosis. The dose should not exceed 100 mg every day or 150 mg every other day in these patients. Bupropion hydrochloride extended-release should be used with caution in patients with hepatic impairment (including mild to moderate hepatic cirrhosis) and a reduced frequency and/or dose should be considered in patients with mild to moderate hepatic cirrhosis (see **CLINICAL PHARMACOLOGY, WARNINGS, and PRECAUTIONS**).

Dosage Adjustment for Patients with Impaired Renal Function: Bupropion hydrochloride extended-release should be used with caution in patients with renal impairment and a reduced frequency and/or dose should be considered (see **CLINICAL PHARMACOLOGY and PRECAUTIONS**).

HOW SUPPLIED: Bupropion hydrochloride extended-release tablets, 100 mg, are round, biconvex, aquamarine, film coated tablets debossed "E" over "410" on one side and plain on the other side in bottles of 60, 100, and 500 tablets.

Bupropion hydrochloride extended-release tablets, 150 mg, are round, biconvex, plum, film coated tablets debossed "E" over "415" on one side and plain on the other side in bottles of 60, 100, and 500 tablets.

Store at 20°-25°C (68°-77°F) [See USP Controlled Room Temperature]. Store in a dry place. Keep tightly closed. Protect from light.

Dispense contents with a child-resistant closure (as required) and in a tight, light-resistant container as defined in the USP.

KEEP THIS AND ALL MEDICATION OUT OF THE REACH OF CHILDREN.

Do not use in combination with ZYBAN®, or any other medicines that contain bupropion hydrochloride.

ZYBAN® is a registered trademark of GlaxoWellcome.

Manufactured by:
Eon Labs, Inc
Laurelton, NY 11413

Exp. Date:

Lot No.:

USUAL DOSAGE: See accompanying literature for complete prescribing information.

Store at 20°-25°C (68°-77°F) [See USP Controlled Room Temperature]. Store in a dry place. Keep tightly closed. Protect from light.

Dispense contents with a child-resistant closure (as required) and in a tight, light-resistant container as defined in the USP.

Rev. 12/03
L6089

NDC 0185-0415-01

**Bupropion
Hydrochloride
Extended-Release
Tablets**

150 mg*

Rx only

100 Tablets

E Eon Labs

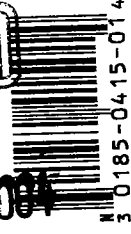
Each extended-release tablet contains:
Bupropion
Hydrochloride 150 mg

Two (2) times daily. See package insert for full dosage information.
KEEP THIS AND ALL MEDICATION OUT OF THE REACH OF CHILDREN.

WARNING: Do not use in combination with ZYBAN®, or any other medicines that contain bupropion hydrochloride.

ZYBAN® is a registered trademark of GlaxoWellcome.

Manufactured by:
Eon Labs, Inc.
Laurelton, NY 11413



0185-0415-014

Exp. Date:

Lot No.:

USUAL DOSAGE: See accompanying literature for complete prescribing information.

Store at 20°-25°C (68°-77°F) [see USP Controlled Room Temperature]. Store in a dry place. Keep tightly closed. Protect from light.

This is a bulk package. Dispense contents with a child-resistant closure (as required) and in a tight, light-resistant container as defined in the USP.

Rev. 12/03
L6096

NDC 0185-0415-05

**Bupropion
Hydrochloride
Extended-Release
Tablets**

150 mg*

Rx only

500 Tablets

E Eon Labs

Each extended-release tablet contains:
Bupropion
Hydrochloride 150 mg

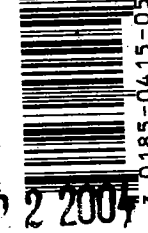
Two (2) times daily. See package insert for full dosage information.

KEEP THIS AND ALL MEDICATION OUT OF THE REACH OF CHILDREN.

WARNING: Do not use in combination with ZYBAN®, or any other medicines that contain bupropion hydrochloride.

ZYBAN® is a registered trademark of GlaxoWellcome.

Manufactured by:
Eon Labs, Inc.
Laurelton, NY 11413



0185-0415-052

Exp. Date:

Lot No.:

USUAL DOSAGE: See accompanying literature for complete prescribing information.

Store at 20°-25°C (68°-77°F) [See USP Controlled Room Temperature]. Store in a dry place. Keep tightly closed. Protect from light.

Dispense contents with a child-resistant closure (as required) and in a tight, light-resistant container as defined in the USP.

Rev. 12/03
L6103

NDC 0185-0415-60

**Bupropion
Hydrochloride
Extended-Release
Tablets**

150 mg*

Rx only

60 Tablets

E Eon Labs

Each extended-release tablet contains:
Bupropion
Hydrochloride 150 mg

Two (2) times daily. See package insert for full dosage information.

KEEP THIS AND ALL MEDICATION OUT OF THE REACH OF CHILDREN.

WARNING: Do not use in combination with ZYBAN®, or any other medicines that contain bupropion hydrochloride.

ZYBAN® is a registered trademark of GlaxoWellcome.

Manufactured by:
Eon Labs, Inc.
Laurelton, NY 11413



0185-0415-601

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 75-932/ S-001, S-002

LABELING REVIEWS

**APPROVAL SUMMARY
REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH**

ANDA Number:	75-932 / SLR-002	Date of Submissions: December 18, 2003
Applicant's Name:	Eon Labs Manufacturing, Inc.	
Established Name:	Bupropion Hydrochloride Extended-release Tablets USP, 150 mg	

APPROVAL SUMMARY (List the package size, strengths(s), and date of submission for approval)

Do you have 12 Final Printed Labels and Labeling?

Yes

CONTAINER LABELS – 150 mg (60s, 100s, and 500s)

Satisfactory in FPL as of December 18, 2003 submission (vol. 4.1). Post approval changes will be made at the next reprint.

PROFESSIONAL PACKAGE INSERT LABELING:

Satisfactory in FPL as of December 18, 2003 submission (Rev 12/03) [vol. 4.1].

REVISIONS NEEDED POST-APPROVAL

Eon Labs made a commitment, see attached e-mail to make the following changes post approval.

Physician insert:

The statement "This product meets USP Drug Release Test #2." will be included as the last paragraph in the DESCRIPTION section of the insert.

Container Label:

The statement "Twice-a-day*" will be included beneath the product strength on the principal panel and include the statement "**See package insert for full dosage information." on the side panel of the container label.

BASIS OF APPROVAL

Was this approval based upon a petition? No

What is the RLD on the 356(h) form: Wellbutrin SR

NDA Number: 20-358

NDA Drug Name: Wellbutrin SR ® Tablets.

NDA Firm: Glaxo Wellcome

Date of Approval of NDA Insert and supplement #: October 22, 2002 / S-029

Has this been verified by the MIS system for the NDA? Yes

Was this approval based upon an OGD labeling guidance? No

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured. USP 27	x		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?		X	
Error Prevention Analysis			
Has the firm proposed a proprietary name? No.		X	
Packaging			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.	X		
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?			X
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
Labeling			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?		X	
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	

Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?		X	
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.			X
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			
Is the scoring configuration different than the RLD?			x
Has the firm failed to describe the scoring in the HOW SUPPLIED section?			x
Inactive Ingredients: (FTR: List page # in application where inactives are listed)			
Does the product contain alcohol? If so, has the accuracy of the statement been confirmed?		X	
Do any of the inactives differ in concentration for this route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in neonates)?		X	
Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	
Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?		X	
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)		X	
USP Issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	
Does USP have labeling recommendations? If any, does ANDA meet them?			X
Is the product light sensitive? If so, is NDA and/or ANDA in a light resistant container? ANDA IN HDPE CONTAINERS	x		
Failure of DESCRIPTION to meet USP Description and Solubility information? If so, USP information should be used. However, only include solvents appearing in innovator labeling.		X	
Bioequivalence Issues: (Compare bioequivalency values: insert to study. List C _{max} , T _{max} , T 1/2 and date study acceptable)			
Insert labeling references a food effect or a no-effect? If so, was a food study done?	X		
Has CLINICAL PHARMACOLOGY been modified? If so, briefly detail where/why.		X	
Patent/Exclusivity Issues?: FTR: Check the Orange Book edition or cumulative supplement for verification of the latest Patent or Exclusivity. List expiration date for all patents, exclusivities, etc. or if none, please state.			

FOR THE RECORD:

1. GENERAL

The tentative approval letter was issued on January 24, 2002, and the sponsor submitted a minor amendment requesting final approval of the application. However, the sponsor failed to use the most currently approved labeling as a model and needs to make requested revisions prior to approval. The sponsor submitted this application with the patent certification IV (the court has not made any final decision yet on all patents) and the 30-month stay period expired on April 18, 2003. RLD also has exclusivity that expires on June 11, 2004 and the sponsor indicated in their January 18, 2002 letter that

they are not planning to market their product until the exclusivity is expired. Therefore, the labeling will be same as the last approved RLD labeling not the OGD model labeling with the carve outs.

During a teleconference call on October 24, 2003 in response to the deficiency letter faxed on October 23, 2003, the sponsor indicated that they have completed the packaging and labeling with the container labels bearing the old USP storage legend of 15-30°C, and changing container labels at this time would be a burdensome task. As discussed, the sponsor stated in their October 27, 2003 submission that the changes will be incorporated at the next reprint and FPLs for labels and labeling will be submitted as a Special Supplement – Changes Being Effected – 0 Day, and it is acceptable.

On October 30, 2003, the sponsor was notified that the Patient Package Insert was not revised as instructed in the deficiency letter and the sponsor submitted the revised version on October 31, 2003 which was found to be acceptable.

On November 3, 2003, the sponsor submitted the revised PPI which the dosage form “tablets” was added to “bupropion hydrochloride extended-release” after notified by the labeling reviewer.

On November 6, 2003, the labeling review team became aware that we are only fully approving 100 mg strength of bupropion hydrochloride extended-release tablets and the sponsor was notified by the Division Director, Peter Rickman, to submit a separate labeling for bupropion hydrochloride extended-release 100 mg tablets since the sponsor’s labeling was a combined labeling with 150 mg tablets.

Until the generic exclusivity is expired or becomes invalid, we are approving the 100 mg strength and tentatively approve 150 mg strength with the combined labeling.

On March 17, 2004, the labeling review team was notified by the PM that we are ready to approve 150 mg strength. The firm did not put the statement “Twice-a-day” on the principal panel of the container label as requested previously but made a commitment to make those changes post-approval.

2. MODEL LABELING

This review was based on the labeling for Wellbutrin SR (Glaxo Wellcome; Approved 10-22-02) NDA 20-358/S-029. The sponsor stated in their cover letter that they used the most currently approved Wellbutrin SR labeling, however, there was no information regarding the labeling that was used as a model. According to the COMIS, SLR-029 was the most current labeling, and it was noted that this labeling was not used as a model, especially the patient package insert. I have asked the sponsor to revise the whole patient package insert to be the same as the attached RLD PPI in addition to the requested revisions to the physician package insert.

In review of the SLR-002 dated December 18, 2003, I compared the combined labeling for 100 mg and 150 mg to the approved labeling for 100 mg. It was identical except for those information specific for the 150 mg strength and is acceptable for approval.

3. DESCRIPTION

The inactive ingredients are listed accurately in the DESCRIPTION section (Vol. 1.1 Page 152-153)

4. MANUFACTURING FACILITY OF FINISHED DOSAGE FORM

Eon Labs Manufacturing, Inc.
227-15 North Conduit Avenue
Laurelton, New York 11413

(Vol. 1.2. Page 289).

5. PACKAGING CONFIGURATIONS

RLD: 100 mg and 150 mg strengths - both in 60s.

ANDA: 100 mg and 150 mg strengths in container sizes of 60s, 100s and 500s.

Package Size	Bottle Size/Shape	Resin	Filler	Closure Size/Type	Innerseal/Liner	
100 mg						
60 count	100 cc round	HDPE	Cotton	38 mm CRC		
100 count	100 cc round	HDPE	Cotton	38 mm CRC		
500 count	300 cc round	HDPE	Cotton	45 mm CRC		
150 mg						
60 count	100 cc round	HDPE	Cotton	38 mm CRC		
100 count	100 cc round	HDPE	Cotton	38 mm CRC		
500 count	400 cc round	HDPE	Cotton	53 mm CRC		

(Vol. 1.3. Page 621).

6. TABLET IMPRINT

The tablet imprintings have been accurately described in the HOW SUPPLIED section of the Insert according to the sponsor's "Quality Control Finished Tablet Specification & Report Form".

100 mg Tablets: Round, biconvex, aquamarine, film-coated tablets imprinted "E" over "410" on one side and plain on the other side in bottles of 60, 100, and 500 tablets.

150 mg Tablets: Round, biconvex, plum, film-coated tablets imprinted "E" over "415" on one side and plain on the other side in bottles of 60, 100, and 500 tablets.

(Vol. 1.3. Page 816 – 818)

7. PATENT/EXCLUSIVITY STATEMENT

Patent Data

Patent Number	Patent Expiration	How Filed	Labeling Impact
5358970	August 12, 2013	IV	None
5427798	August 12, 2013	IV	None
5731000	August 12, 2013	IV	None
5763493	August 12, 2013	IV	None

Exclusivity Data

Exclusivity Code	Reference	Expiration	Labeling Impact
M-10	INFORMATION REGARDING MAINTENANCE OF AN ANTIDEPRESSANT EFFECT UP TO 1 YEAR OF DOSING	June 11, 2004	None (This product will not be marketed until the exclusivity is expired per 1/18/02 GC or will not include any information relative to the M-10 exclusivity until such time as the exclusivity expires or is no longer valid.)

8. Per memo from Kim Dettelbach, we will not require generic bupropions to reference a Pregnancy Registry.

9. Storage/dispensing recommendations:

USP - Preserve in well-closed containers.

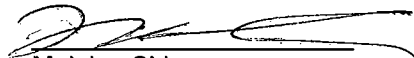
RLD - Store at controlled room temperature 20°-25°C (68°-77°F) [see USP]. Dispense in a tight, light-resistant container as defined in the USP.

ANDA - Store at 20° -25° C (68° -77° F) [see USP Controlled Room Temperature]. Store in a dry place. Keep tightly closed. Protect from light. Dispense contents with a child-resistant closure (as required) and in a tight, light-resistant container as defined in the USP.

Date of Review: March 17, 2004

Date of Submission: December 18, 2003

Primary Reviewer:


Melaine Shin

3-17-04
Date:

Team Leader:


Lillie Golson

3/17/04
Date

cc:

ANDA: 75-932
DUP/DIVISION FILE
HFD-613/MShin/LGolson (no cc)
V:Firmsam\Eon\Ltr&Rev\75932 150 mg approval summary.
Review

Shin, Melaine M

From: Enna Krivitsky [E.Krivitsky@eonlabs.com]
Sent: Wednesday, March 17, 2004 5:39 PM
To: Shin, Melaine M
Subject: RE: ANDA # 75-932

Importance: High

Dear Melaine,

Reference is made to our telephone conversation of March 17, 2004 regarding Eon Labs' Abbreviated New Drug Application for Bupropion Hydrochloride Extended-Release Tablets, 150 mg, ANDA # 75-932.

Pursuant to our discussion, Eon Labs commits to file a Special Supplement - Changes Being Effectuated - 0 Day at the time of the first re-print of the labeling after the product launch with the following changes:

1) The statement "Twice-a-day" will be included beneath the product strength on the principal panel and the statement "*See package insert for full dosage information." will be included on the side panel of the container labels.

2) The statement "This product meets USP Drug Release Test # 2." will be included as the last paragraph in the DESCRIPTION section of the insert.

If you have any additional questions, please do not hesitate to call me at (718) 276-8607 ext. 235.

Sincerely,
Enna Krivitsky
Manager, Regulatory Affairs
Eon Labs, Inc.
Phone: (718) 276-8607 x 235
Fax: (718) 276-8635
E-mail: E.Krivitsky@Eonlabs.com

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-----Original Message-----

From: Shin, Melaine M [mailto:SHINM@cder.fda.gov]
Sent: Wednesday, March 17, 2004 11:08 AM
To: 'Enna Krivitsky'
Subject: RE: ANDA # 75-932

Hi Enna,

Please send me an email or a fax stating that you will be making the below changes post approval.

To make a commitment to include "Twice-a-day*" beneath the product strength on the principal panel and include the statement "*See

package insert for full dosage information." on the side panel.

**APPEARS THIS WAY
ON ORIGINAL**

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 75-932/ S-001, S-002

CHEMISTRY REVIEWS

Office of Generic Drugs
Supplement Review

ANDAs 75-932/S-001

NAME AND ADDRESS OF APPLICANT

Eon Labs, Inc.
227-15 N. Conduit Avenue
Laurelton, NY 11413

PURPOSE OF SUPPLEMENT

The supplemental applications provide for the final approval of the 150 mg dosage strength, submitted as a Supplemental Application - Expedited Review Requested.

DATE OF SUBMISSION

Original Supplement December 19, 2003

PHARMACOLOGICAL CATEGORY

Antidepressant

TRADE NAME

N/A

NONPROPRIETARY NAME

Bupropion HCl ER Tablets

DOSAGE FORM

Extended-Release Tablet

STRENGTH

150 mg

RX OR OTC

Rx

SAMPLES

N/A

RELATED IND/NDA/DMF

N/A

STERILIZATION

N/A

LABELING

N/A

BIOEQUIVALENCY STATUS

N/A

ESTABLISHMENT INSPECTION

N/A

COMPONENTS/COMPOSITION/MANUFACTURING/CONTROLS

In this supplement, the firm requested an Expedited Review for the final approval of the 150 mg strength drug product, which is granted on 3/16/04.

There have been no changes to the chemistry and manufacturing control information for the 150 mg dosage strength. The only issue that remains is the 180 days exclusivity issue for the 150 mg dosage strength. Once the issue is resolved, Chemistry review has no objection to the full approval of the drug product.

PACKAGING

N/A

STABILITY

N/A

REMARKS AND CONCLUSION

Approval is recommended.

RECALLS

N/A

REVIEWER

Bing Wu

DATE COMPLETED

16-Mar-2004

DMF CHECKLIST FOR ANDAs 75-932/S-001

<u>DMF #</u>	<u>DMF TYPE/SUBJECT/HOLDER</u>	<u>ACTION CODE</u>	<u>RESULT OF REVIEW</u>	<u>DATE REVIEW COMPLETED</u>
--------------	------------------------------------	------------------------	-----------------------------	--------------------------------------

N/A

Comments:

Comments:

Comments:

Comments:

Comments:

APPEARS THIS WAY
ON ORIGINAL

ACTION CODES: (1) DMF Reviewed. Other codes indicate why the DMF was not reviewed, as follows:

- | | |
|--|--|
| (2) Type 1 DMF; | (3) Reviewed previously and no revision since last review; |
| (4) Sufficient information in application; | (5) Authority to reference not granted; |
| (6) DMF not available; | (7) Other (explain under "Comments"). |

Page 1 of 1 .

Bing Wu

Reviewer

Bing Wu

Signature

3/16/04

Date

cc: ANDA 75-932/S-001
Division File
Field Copy

Endorsements:

HFD-640/BWu/3/16/04

HFD-643/SRosencrance/3/17/04

V:\FIRMSAM\EON\LTRS&REV\75932s001.rev1.doc

F/T by

APPROVAL

Big WA 3/18/04
MM/penance 3/18/04

APPEARS THIS WAY
ON ORIGINAL

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 75-932/ S-001, S-002

ADMINISTRATIVE DOCUMENTS

OFFICE OF GENERIC DRUGS
EXPEDITED REVIEW REQUESTED

SPECIAL

ANDA/SUPPLEMENT #: **665-001** APPLICANT: **75932**
 DRUG: **SL-002/AX** DATE OF SUBMISSION: **12-18-03**

The Office of Generic Drugs MaPP # 5240.1 lists the following criteria for granting expedited review status to a supplemental abbreviated new drug application. At least one of the criteria must be met.

1. PUBLIC HEALTH NEED. Events that affect the availability of a drug for which there is no alternative

2. EXTRAORDINARY HARDSHIP ON THE APPLICANT.

a) Catastrophic events such as explosion, fire, storms, damage.

b) Events that could not have been reasonably foreseen and for which the applicant could not plan. Examples include:

- Abrupt discontinuation of supply of active ingredient, packaging material, or container closure; and
- Relocation of a facility or change in an existing facility because of a catastrophic event (see item 2.a)

3. AGENCY NEED.

a) Matters regarding the government's drug purchase program, upon request from the appropriate FDA office.

b) Federal or state legal/regulatory actions, including mandated formulation changes or labeling changes if it is in the Agency's best interest.

c) Expiration-date extension or packaging change when the drug product is the subject of a government contract award.

d) Request for approval of a strength that was previously tentatively approved (To be used in those cases where 180-day generic drug exclusivity prevented full approval of all strengths).

RECOMMENDATIONS:

DISCIPLINE	STATUS		SIGNATURE/DATE
Team Project Manager (PM must sign)	Grant	Deny	<i>D. Shepperson</i> 1/8/04
Chemistry Team Leader (sign as needed)	Grant	Deny	<i>M. J. Gennaro</i> 3/1/04
Micro Team Leader (sign as needed)	Grant	Deny	
Labeling Team Leader (sign as needed)	Grant	Deny	
Chem. Div./Deputy Director (DD must sign)	Grant	Deny	<i>[Signature]</i> 3/16/04

RETURN TO PROJECT MANAGER CHEMISTRY TEAM

a) When expedited review is denied, notify the applicant by telephone
DATE _____

TO DOCUMENT ROOM FOR PROCESSING (orig: ANDA; cc: PBeersBlock)

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 75-932/ S-001, S-002

CORRESPONDENCE

December 18, 2003

Mr. Gary J. Buehler
Director, HFD-600
Office of Generic Drugs
Food and Drug Administration
Document Control Room
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

NDA NO. SL REF NO. 002
NDA SUPPL FOR LABELING
REVIS
AX

SUPPLEMENTAL APPLICATION – EXPEDITED REVIEW REQUESTED

**Re: Bupropion Hydrochloride Extended-Release Tablets, 150 mg
ANDA # 75-932**

Dear Mr. Buehler:

Reference is made to your letter dated November 25, 2003 granting **full approval** for Eon Labs' Abbreviated New Drug Application for Bupropion Hydrochloride Extended-Release Tablets, 100 mg and to your letter dated January 24, 2002 granting **tentative approval** for Eon Labs' Abbreviated New Drug Application for Bupropion Hydrochloride Extended-Release Tablets, 100 mg and 150 mg, **ANDA # 75-932**.

In support of our application to provide for final approval of the 150 mg dosage strength, submitted herein is a **Supplemental Application – Expedited Review Requested** providing updated chemistry and manufacturing control information.

180 DAYS EXCLUSIVITY ISSUE

It is Eon's understanding that the agency likely will soon be presented with a situation where 180-day exclusivity will no longer be an obstacle to grant the final approval of Eon's ANDA for 150 mg tablets. Based on the public information, it is Eon's understanding that IMPAX Laboratories, Inc. (IMPAX) will in the very near future and possibly before the end of 2003, be in a position to receive approval of its ANDA for both the 100 mg and 150 mg strengths of Bupropion Hydrochloride Tablets. At that time, Andrx Pharmaceuticals, LLC (Andrx), the ANDA sponsor that is entitled to 180-day exclusivity for the 150 mg strength of Bupropion Hydrochloride Tablets, will relinquish its 180-day exclusivity so that IMPAX will be able to receive final ANDA approval for both the 100 mg and 150 mg strengths. In that event, Eon requests that FDA grant final approval of this ANDA for the 150 mg strength at the same time it grants final approval to IMPAX.

G. Buehler

December 18, 2003

RECEIVED
Page 1 of 2

DEC 19 2003

OGD/CDER

CHEMISTRY AND MANUFACTURING CONTROL INFORMATION

There have been no changes to the chemistry and manufacturing control information for the 150 mg dosage strength since the submission of the **Minor Amendment – Final Approval Requested** dated July 2, 2003.

LABELING

Submitted herein are twelve (12) copies each of final printed label text for the container label and package insert, **ATTACHMENT 1**.

Please note that the final printed patient package information leaflet (submitted in the **Labeling Amendment** dated November 3, 2003) has already been approved on November 25, 2003, and there have been no changes to the patient package information leaflet since the approval.

In addition, any information relative to the M-10 exclusivity has been removed from the final printed insert, and Eon Labs certifies that it will not market it's Bupropion Hydrochloride Extended-release Tablets or include in it's insert any information relative to the M-10 exclusivity until such time as the exclusivity either expires (June 11, 2004) or is no longer valid.

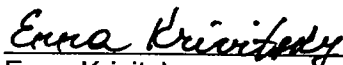
A side-by-side comparison of the final printed package insert versus the previously approved version (**Labeling Amendment** dated November 20, 2003) with a table of annotation is provided, **ATTACHMENT 2**.

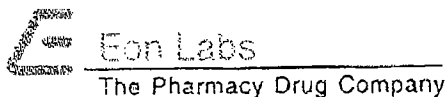
A side-by-side comparison of the final printed container label versus the previously submitted version (**Minor Amendment – Final Approval Requested** dated July 2, 2003) with a table of annotation is provided, **ATTACHMENT 3**. The 60-count package size for the 150 mg strength was used as the representative label for the side-by-side comparison.

With regards to the analytical methods validation studies to be performed by the FDA District Laboratory, Eon Labs commits to addressing any deficiencies found by the District Laboratory post approval.

We hope that the information provided is satisfactory to approve our Abbreviated New Drug Application for Bupropion Hydrochloride Extended-release Tablets, 150 mg. If you require further information or clarification, please feel free to contact me at (718) 276-8607, extension 235.

Sincerely,
Eon Labs, Inc.


Enna Krivitsky
Manager, Regulatory Affairs



Eon Labs, Inc.
227-15 N. Conduit Avenue
Laurelton, NY 11413
Telephone 718 276-8600
Fax 718 276-1735

FILE IN ANDA
75-932
(XO)

March 22, 2004

Mr. Robert West
Deputy Director
HFD-601
Office of Generic Drugs
Food and Drug Administration
Document Control Room
Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

- MINOR AMENDMENT -

RE: **Bupropion Hydrochloride Extended-Release Tablets, 100 and 150 mg**
ANDA 75-932

Dear Mr. West:

Pursuant to our recent telephone conversation on March 22, 2004 regarding our Abbreviated New Drug Application for Bupropion Hydrochloride Extended-Release Tablets, 100 mg and 150 mg, **ANDA 75-932**, submitted herein is a **MINOR AMENDMENT** regarding our request for final approval of the 150 mg dosage strength.

As per our discussion, Eon Labs has been advised that ANDRX Corporation has relinquished its 180 exclusivity associated with their **ANDA** ——— for Bupropion Hydrochloride Extended-release tablets, 100 mg, and 150 mg in a letter dated March 19, 2004. As a result, please expedite final approval of our application in accordance with our earlier amendment dated December 18, 2003.

Please advise if additional information is required to approve our application. I can be reached at (718) 276-8607 x330.

Sincerely,

Eon Labs, Inc.

Sadie M. Ciganek

Vice president Regulatory Affairs