DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville, MD 20857

ANDA 077369

TEVA Pharmaceuticals, USA
Attention: Jean W. Zwicker
Senior Director, Regulatory Affairs
1090 Horsham Road
P.O. Box 1090
North Wales, PA 19454

Dear Madam:

This is in reference to your abbreviated new drug application (ANDA) dated November 10, 2004, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Irbesartan and Hydrochlorothiazide Tablets USP, 150 mg/12.5 mg, 300 mg/12.5 mg and 300 mg/25 mg.

Reference is also made to the tentative approval letter issued by this office on May 8, 2007, and to your amendments dated August 23, 2007; January 26 2009; March 17, and July 12, 2010; February 3, and March 1, 2011; and January 6, January 10, January 30, March 2, and March 27, 2012.

We note that Avalide Tablets, 300 mg/25 mg, of Sanofi Aventis (Sanofi) are no longer being marketed in the United States and that they are currently listed in the discontinued section of the Agency's publication titled Approved Drug Products with Therapeutic Equivalence Evaluations, the "Orange Book". Reference is made to the Federal Register notice dated January 11, 2012 (Volume 77, No. 7) in which the agency announced its determination that Avalide Tablets, 300 mg/25 mg, were not withdrawn from sale for reasons of safety or effectiveness. This determination allows the agency to approve ANDAs for the discontinued drug product.

We have completed the review of this ANDA and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the ANDA is approved, effective on the date of this letter. The Division of Bioequivalence has

determined your Irbesartan and Hydrochlorothiazide Tablets USP, 150 mg/12.5 mg, 300 mg/12.5 mg and 300 mg/25 mg, to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug (RLD), Avalide Tablets, 150 mg/12.5 mg, 300 mg/12.5 mg and 300 mg/25 mg, respectively, of Sanofi Aventis (Sanofi). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your ANDA.

The RLD upon which you have based your ANDA, Sanofi's Avalide Tablets, 150 mg/12.5 mg, 300 mg/12.5 mg and 300 mg/25 mg, is subject to a period of patent protection. As noted in the agency's publication titled Approved Drug Products with Therapeutic Equivalence Evaluations (the "Orange Book"), U.S. Patent No. 5,994,348 (the '348 patent), is scheduled to expire on December 7, 2015 (with pediatric exclusivity added).

Your ANDA contains a paragraph IV certification under section 505(j)(2)(A)(vii)(IV) of the Act stating that the '348 patent is invalid, unenforceable, or will not be infringed by your manufacture, use, or sale of Irbesartan and Hydrochlorothiazide Tablets, 150 mg/12.5 mg, 300 mg/12.5 mg and 300 mg/25 mg, under this ANDA. You have notified the agency that TEVA Pharmaceuticals, USA (TEVA) Pharmaceuticals, USA (TEVA) complied with the requirements of section 505(j)(2)(B) of the Act, and that no action for infringement of the '348 patent was brought against TEVA within the statutory 45-day period.

With respect to 180-day generic drug exclusivity, we note that TEVA was the first ANDA applicant to submit a substantially complete ANDA with a paragraph IV certification for Irbesartan and Hydrochlorothiazide Tablets, 150 mg/12.5 mg, 300 mg/12.5 mg and 300 mg/25 mg. Therefore, with this approval, TEVA is eligible for 180 days of generic drug exclusivity. This exclusivity, which is provided for under section 505(j)(5)(B)(iv) of the Act, will begin to run from the date of the commercial marketing identified in section 505(j)(5)(B)(iv). Please submit correspondence to this ANDA informing the agency of the date the exclusivity begins to run.

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

Please note that if FDA requires a Risk Evaluation & Mitigation Strategy (REMS) for a listed drug, an ANDA citing that listed drug also will be required to have a REMS. See section 505-1(i) of the Act.

Postmarketing reporting requirements for this ANDA 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 this drug.

Promotional materials may be submitted to FDA for comment prior to publication or dissemination. Please note that these submissions are voluntary. If you desire comments on proposed launch promotional materials with respect to compliance with applicable regulatory requirements, we recommend you submit, in draft or mock-up form, two copies of both the promotional materials and package insert directly to:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705

We call your attention to 21 CFR 314.81(b)(3) which requires that all promotional materials be submitted to the Office of Prescription Drug Promotion with a completed Form FDA 2253 at the time of their initial use.

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm, that is identical in content to the approved labeling (including the package insert, and any patient package insert and/or Medication Guide that may be required). Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/U_CM072392.pdf.

The SPL will be accessible via publicly available labeling repositories.

Sincerely yours,

{See appended electronic signature page}

Keith Webber, Ph.D.
Deputy Director
Office of Pharmaceutical Science
Center for Drug Evaluation and Research

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

/s/

ROBERT L WEST

03/30/2012

Deputy Director, Office of Generic Drugs
for Keith Webber, Ph.D.