

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:
ANDA 077415Orig1s018

Name: Bupropion Hydrochloride Extended-Release
Tablets USP (XL)
150 mg and 300 mg

Sponsor: Impax Laboratories, Inc.

Approval Date: March 29, 2012

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 077415Orig1s018

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ANDA 077415Orig1s018

APPROVAL LETTER



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Rockville MD 20855

ANDA 077415/S-018

Impax Laboratories, Inc.
Attention: Michelle Wong
30831 Huntwood Avenue
Hayward, CA 94544

Dear Madam:

This is in reference to your supplemental new drug application dated September 6, 2011, submitted pursuant to 21 CFR 314.70 (c) (6) [Supplement – Changes Being Effected], regarding your abbreviated new drug application for Bupropion Hydrochloride Extended-release Tablets USP (XL), 150 mg and 300 mg.

This supplemental new drug application provides for the revised package insert to be in accordance with the labeling changes to the reference listed drug (RLD), Wellbutrin XL® Extended-release Tablets, NDA 021515/S-026 and S-027, approved July 26, 2011.

We have completed the review of your supplemental new drug application and it is approved.

We 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.

CONTENT OF LABELING

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/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

PROMOTIONAL MATERIALS

All promotional materials for your drug product that include representations about your drug product must be promptly revised to make it consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions to your promotional materials should include prominent disclosure of the important new safety information that appears in the revised package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the following address or by facsimile at 301-847-8444:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266

In addition, as required under 21 CFR 314.81(b)(3)(i), you must submit your updated final promotional materials, and the package insert(s), at the time of initial dissemination or publication, accompanied by a Form FDA-2253, directly to the above address. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

We remind you that you must comply with the requirements for an approved abbreviated new drug application described in 21 CFR 314.80-81.

The materials submitted are being retained in our files.

Sincerely,

{See appended electronic signature page}

Wm Peter Rickman
Director
Division of Labeling and Program Support
Office of Generic Drugs
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/

JOHN F GRACE
03/29/2012
for Wm Peter Rickman

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 077415Orig1s018

LABELING

MEDICATION GUIDE

Bupropion Hydrochloride Extended-Release Tablets (XL)

Read this Medication Guide carefully before you start using bupropion hydrochloride extended-release tablets (XL) and each time you get a refill. There may be new information. This information does not take the place of talking with your doctor about your medical condition or your treatment. If you have any questions about bupropion hydrochloride extended-release tablets (XL), ask your doctor or pharmacist.

IMPORTANT: Be sure to read the three sections of this Medication Guide. The first section is about the risk of suicidal thoughts and actions with antidepressant medicines; the second section is about the risk of changes in thinking and behavior, depression and suicidal thoughts or actions with medicines used to quit smoking; and the third section is entitled "What Other Important Information Should I Know About bupropion hydrochloride extended-release tablets (XL)?"

Antidepressant Medicines, Depression and Other Serious Mental Illnesses, and Suicidal Thoughts or Actions

This section of the Medication Guide is only about the risk of suicidal thoughts and actions with antidepressant medicines. **Talk to your doctor or your family member's healthcare provider about:**

- all risks and benefits of treatment with antidepressant medicines
- all treatment choices for depression or other serious mental illness

What is the most important information I should know about antidepressant medicines, depression and other serious mental illnesses, and suicidal thoughts or actions?

1. **Antidepressant medicines may increase suicidal thoughts or actions in some children, teenagers, and young adults within the first few months of treatment.**
2. **Depression and other serious mental illnesses are the most important causes of suicidal thoughts and actions. Some people may have a particularly high risk of having suicidal thoughts or actions.** These include people who have (or have a family history of) bipolar illness (also called manic-depressive illness) or suicidal thoughts or actions.
3. **How can I watch for and try to prevent suicidal thoughts and actions in myself or a family member?**
 - Pay close attention to any changes, especially sudden changes, in mood, behaviors, thoughts, or feelings. This is very important when an antidepressant medicine is started or when the dose is changed.
 - Call the healthcare provider right away to report new or sudden changes in mood, behavior, thoughts, or feelings.
 - Keep all follow-up visits with the healthcare provider as scheduled. Call the healthcare provider between visits as needed, especially if you have concerns about symptoms.

Call a healthcare provider right away if you or your family member has any of the following symptoms, especially if they are new, worse, or worry you:

- thoughts about suicide or dying
- attempts to commit suicide
- new or worse depression
- trouble sleeping (insomnia)
- new or worse irritability
- acting aggressive, being angry, or violent
- new or worse anxiety
- feeling very agitated or restless
- panic attacks
- acting on dangerous impulses
- an extreme increase in activity and talking (mania)
- other unusual changes in behavior or mood

What else do I need to know about antidepressant medicines?

- **Never stop an antidepressant medicine without first talking to a healthcare provider.** Stopping an antidepressant medicine suddenly can cause other symptoms.
- **Antidepressants are medicines used to treat depression and other illnesses.** It is important to discuss all the risks of treating depression and also the risks of not treating it. Patients and their families or other caregivers should discuss all treatment choices with the healthcare provider, not just the use of antidepressants.
- **Antidepressant medicines have other side effects.** Talk to the healthcare provider about the side effects of the medicine prescribed for you or your family member.
- **Antidepressant medicines can interact with other medicines.** Know all of the medicines that you or your family member takes. Keep a list of all medicines to show the healthcare provider. Do not start new medicines without first checking with your healthcare provider.
- **Not all antidepressant medicines prescribed for children are FDA approved for use in children.** Talk to your child's healthcare provider for more information.

Bupropion hydrochloride extended-release tablets (XL) have not been studied in children under the age of 18 and are not approved for use in children and teenagers.

Quitting Smoking, Quit-Smoking Medications, Changes in Thinking and Behavior, Depression, and Suicidal Thoughts or Actions

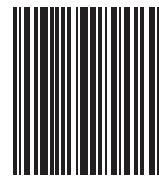
This section of the Medication Guide is only about the risk of changes in thinking and behavior, depression and suicidal thoughts or actions with drugs used to quit smoking.

Although bupropion hydrochloride extended-release tablets (XL) are not a treatment for quitting smoking, it contains the same active ingredient (bupropion hydrochloride) as ZYBAN® which is used to help patients quit smoking.

Some people have had changes in behavior, hostility, agitation, depression, suicidal thoughts or actions while taking bupropion to help them quit smoking. These symptoms can develop during treatment with bupropion or after stopping treatment with bupropion.

If you, your family member, or your caregiver notice agitation, hostility, depression, or changes in thinking or behavior that are not typical for you, or you have any of the following symptoms, stop taking bupropion and call your healthcare provider right away:

- thoughts about suicide or dying
- attempts to commit suicide
- new or worse depression
- new or worse anxiety
- panic attacks
- feeling very agitated or restless
- an extreme increase in activity and talking (mania) abnormal thoughts or sensations
- seeing or hearing things that are not there (hallucinations)
- feeling people are against you (paranoia)



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- acting aggressive, being angry, or violent
- acting on dangerous impulses
- feeling confused
- other unusual changes in behavior or mood

When you try to quit smoking, with or without bupropion, you may have symptoms that may be due to nicotine withdrawal, including urge to smoke, depressed mood, trouble sleeping, irritability, frustration, anger, feeling anxious, difficulty concentrating, restlessness, decreased heart rate, and increased appetite or weight gain. Some people have even experienced suicidal thoughts when trying to quit smoking without medication. Sometimes quitting smoking can lead to worsening of mental health problems that you already have, such as depression.

Before taking bupropion, tell your healthcare provider if you have ever had depression or other mental illnesses. You should also tell your doctor about any symptoms you had during other times you tried to quit smoking, with or without bupropion.

What Other Important Information Should I Know About Bupropion Hydrochloride Extended-Release Tablets (XL)?

- **Seizures: There is a chance of having a seizure (convulsion, fit) with bupropion hydrochloride extended-release tablets (XL), especially in people:**
 - with certain medical problems.
 - who take certain medicines.

The chance of having seizures increases with higher doses of bupropion hydrochloride extended-release tablets (XL). For more information, see the sections "Who should not take bupropion hydrochloride extended-release tablets (XL)?" and "What should I tell my doctor before using bupropion hydrochloride extended-release tablets (XL)?" Tell your doctor about all of your medical conditions and all the medicines you take. **Do not take any other medicines while you are using bupropion hydrochloride extended-release tablets (XL) unless your doctor has said it is okay to take them.**

If you have a seizure while taking bupropion hydrochloride extended-release tablets (XL), stop taking the tablets and call your doctor right away. Do not take bupropion hydrochloride extended-release tablets (XL) again if you have a seizure.

- **High blood pressure (hypertension). Some people get high blood pressure, that can be severe, while taking bupropion hydrochloride extended-release tablets (XL).** The chance of high blood pressure may be higher if you also use nicotine replacement therapy (such as a nicotine patch) to help you stop smoking.
- **Severe allergic reactions. Some people have severe allergic reactions to bupropion hydrochloride extended-release tablets (XL). Stop taking bupropion hydrochloride extended-release tablets (XL) and call your doctor right away** if you get a rash, itching, hives, fever, swollen lymph glands, painful sores in the mouth or around the eyes, swelling of the lips or tongue, chest pain, or have trouble breathing. These could be signs of a serious allergic reaction.
- **Unusual thoughts or behaviors:** Some patients have unusual thoughts or behaviors while taking bupropion

continued on back

hydrochloride extended-release tablets (XL), including delusions (believe you are someone else), hallucinations (seeing or hearing things that are not there), paranoia (feeling that people are against you), or feeling confused. If this happens to you, call your doctor.

What are bupropion hydrochloride extended-release tablets (XL)?

Bupropion hydrochloride extended-release tablets (XL) are a prescription medicine used to treat adults with a certain type of depression called major depressive disorder and for prevention of autumn-winter seasonal depression (seasonal affective disorder).

Who should not take bupropion hydrochloride extended-release tablets (XL)?

Do not take bupropion hydrochloride extended-release tablets (XL) if you:

- have or had a seizure disorder or epilepsy.
- **are taking ZYBAN® (used to help people stop smoking) or any other medicines that contain bupropion hydrochloride, such as WELLBUTRIN® Tablets (bupropion hydrochloride tablets) or WELLBUTRIN SR® [bupropion hydrochloride extended-release tablets (SR)].** Bupropion is the same active ingredient that is in bupropion hydrochloride extended-release tablets (XL).
- drink a lot of alcohol and abruptly stop drinking, or use medicines called sedatives (these make you sleepy) or benzodiazepines and you stop using them all of a sudden.
- have taken within the last 14 days medicine for depression called a monoamine oxidase inhibitor (MAOI), such as NARDIL® (phenelzine sulfate), PARNATE® (tranylcypromine sulfate), or MARPLAN® (isocarboxazid).
- have or had an eating disorder such as anorexia nervosa or bulimia.
- are allergic to the active ingredient in bupropion hydrochloride extended-release tablets (XL), bupropion, or to any of the inactive ingredients. See the end of this leaflet for a complete list of ingredients in bupropion hydrochloride extended-release tablets (XL).

What should I tell my doctor before using bupropion hydrochloride extended-release tablets (XL)?

- Tell your doctor if you have ever had depression, suicidal thoughts or actions, or other mental health problems. See "Antidepressant Medicines, Depression and Other Serious Mental Illnesses, and Suicidal Thoughts or Actions."
- **Tell your doctor about your other medical conditions, including if you:**
 - **are pregnant or plan to become pregnant.** It is not known if bupropion hydrochloride extended-release tablets (XL) can harm your unborn baby.
 - **are breastfeeding.** Bupropion hydrochloride extended-release tablets (XL) pass through your milk. It is not known if bupropion hydrochloride extended-release tablets (XL) can harm your baby.
 - **have liver problems**, especially cirrhosis of the liver.
 - have kidney problems.
 - have an eating disorder such as anorexia nervosa or bulimia.
 - have had a head injury.
 - have had a seizure (convulsion, fit).
 - have a tumor in your nervous system (brain or spine).
 - have had a heart attack, heart problems, or high blood pressure.
 - are a diabetic taking insulin or other medicines to control your blood sugar.
 - drink a lot of alcohol.
 - abuse prescription medicines or street drugs.
- **Tell your doctor about all the medicines you take**, including prescription and nonprescription medicines, vitamins and herbal supplements. Many medicines

increase your chances of having seizures or other serious side effects if you take them while you are using bupropion hydrochloride extended-release tablets (XL).

How should I take bupropion hydrochloride extended-release tablets (XL)?

- Take bupropion hydrochloride extended-release tablets (XL) exactly as prescribed by your doctor.
- **Do not chew, cut, or crush bupropion hydrochloride extended-release tablets (XL).** If you do, the medicine will be released into your body too quickly. If this happens you may be more likely to get side effects including seizures. You must swallow the tablets whole. **Tell your doctor if you cannot swallow medicine tablets.**
- Take bupropion hydrochloride extended-release tablets (XL) at the same time each day.
- Take your doses of bupropion hydrochloride extended-release tablets (XL) at least 24 hours apart.
- You may take bupropion hydrochloride extended-release tablets (XL) with or without food.
- If you miss a dose, do not take an extra tablet to make up for the dose you forgot. Wait and take your next tablet at the regular time. This is very important. Too much bupropion hydrochloride extended-release tablets (XL) can increase your chance of having a seizure.
- If you take too much bupropion hydrochloride extended-release tablets (XL), or overdose, call your local emergency room or poison control center right away.
- The bupropion hydrochloride extended-release tablet (XL) is covered by a shell that slowly releases the medicine inside your body. You may notice something in your stool that looks like a tablet. This is normal. This is the empty shell passing from your body.
- **Do not take any other medicines while using bupropion hydrochloride extended-release tablets (XL) unless your doctor has told you it is okay.**
- If you are taking bupropion hydrochloride extended-release tablets (XL) for the treatment of major depressive disorder, it may take several weeks for you to feel that bupropion hydrochloride extended-release tablets (XL) is working. Once you feel better, it is important to keep taking bupropion hydrochloride extended-release tablets (XL) exactly as directed by your doctor. Call your doctor if you do not feel bupropion hydrochloride extended-release tablets (XL) is working for you.
- If you are taking bupropion hydrochloride extended-release tablets (XL) for the prevention of seasonal major depressive episodes associated with seasonal affective disorder, it is important to keep taking bupropion hydrochloride extended-release tablets (XL) through the autumn-winter season, or as directed by your doctor.
- Do not change your dose or stop taking bupropion hydrochloride extended-release tablets (XL) without talking with your doctor first.

What should I avoid while taking bupropion hydrochloride extended-release tablets (XL)?

- Do not drink a lot of alcohol while taking bupropion hydrochloride extended-release tablets (XL). If you usually drink a lot of alcohol, talk with your doctor before suddenly stopping. If you suddenly stop drinking alcohol, you may increase your chance of having seizures.
- Do not drive a car or use heavy machinery until you know how bupropion hydrochloride extended-release tablets (XL) affect you. Bupropion hydrochloride extended-release tablets (XL) can impair your ability to perform these tasks.

What are possible side effects of bupropion hydrochloride extended-release tablets (XL)?

Bupropion hydrochloride extended-release tablets (XL) can cause serious side effects. Read this entire Medication Guide for more information about these serious side effects.

Common side effects reported in studies of major depressive disorder include weight loss, loss of appetite, dry mouth, skin rash, sweating, ringing in the ears, shakiness, stomach pain, agitation, anxiety, dizziness, trouble

sleeping, muscle pain, nausea, fast heartbeat, sore throat, and urinating more often. In studies of seasonal affective disorder, common side effects included weight loss, constipation, and gas.

If you have nausea, take your medicine with food. If you have trouble sleeping, do not take your medicine too close to bedtime.

These are not all the side effects of bupropion hydrochloride extended-release tablets (XL). For a complete list, ask your doctor or pharmacist.

Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088 or Impax Laboratories, Inc. at 1-800-934-6729.

How should I store bupropion hydrochloride extended-release tablets (XL)?

- Store bupropion hydrochloride extended-release tablets (XL) at room temperature. Store out of direct sunlight. Keep bupropion hydrochloride extended-release tablets (XL) in a tightly closed bottle.
- Bupropion hydrochloride extended-release tablets (XL) may have an odor.

General Information about bupropion hydrochloride extended-release tablets (XL).

- Medicines are sometimes prescribed for purposes other than those listed in a Medication Guide. Do not use bupropion hydrochloride extended-release tablets (XL) for a condition for which it was not prescribed. Do not give bupropion hydrochloride extended-release tablets (XL) to other people, even if they have the same symptoms you have. It may harm them. Keep bupropion hydrochloride extended-release tablets (XL) out of the reach of children.
- If you take a urine drug screening test, bupropion hydrochloride extended-release tablets (XL) may make the test result positive for amphetamines. If you tell the person giving you the drug screening test that you are taking bupropion hydrochloride extended-release tablets (XL), they can do a more specific drug screening test that should not have this problem.

This Medication Guide summarizes important information about bupropion hydrochloride extended-release tablets (XL). For more information, talk with your doctor. You can ask your doctor or pharmacist for information about bupropion hydrochloride extended-release tablets (XL) that is written for health professionals or you can call toll-free 1-800-934-6729.

What are the ingredients in bupropion hydrochloride extended-release tablets (XL)?

Active ingredient: bupropion hydrochloride.

Inactive ingredients: colloidal silicon dioxide, hydroxypropyl cellulose, lactose monohydrate, magnesium stearate and microcrystalline cellulose. The film-coating material contains FD&C Red No. 40, FD&C Yellow No. 5, hypromellose, macrogol, polydextrose, titanium dioxide and triacetin.

This product contains FD&C Yellow No. 5 (tartrazine) which may cause allergic type reactions (including bronchial asthma) in certain susceptible persons. Although the overall incidence of FD&C Yellow No. 5 (tartrazine) sensitivity in the general population is low, it is frequently seen in patients who also have aspirin sensitivity.

Rx only

This Medication Guide has been approved by the U.S. Food and Drug Administration.

Mfg. by:
IMPAX Laboratories, Inc.
Hayward, CA 94544 USA

Dist. by:
Global Pharmaceuticals
Division of IMPAX Laboratories, Inc.
Philadelphia, PA 19124 USA

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Parnate® is a registered trademark of GlaxoSmithKline.
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Rev. 08/2011
903-04

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 077415Orig1s018

LABELING REVIEW

**Labeling Review Branch
Division of Labeling and Program Support
Office of Generic Drugs**

Labeling Supplement Review

Application Number: 077415/S-018

Name of Drug: Bupropion Hydrochloride Extended-release Tablets USP (XL), 150 mg and 300 mg

Applicant: Impax Laboratories, Inc.

Material Reviewed: labeling

Submission Date(s): August 30, 2011

REMS required?

MedGuides and/or PPIs (505-1(e)) ☒ Yes ☐ No

Communication plan (505-1(e)) ☐ Yes ☒ No

Elements to assure safe use (ETASU) (505-1(f)(3)) ☐ Yes ☒ No

Implementation system if certain ETASU (505-1(f)(4)) ☐ Yes ☒ No

Timetable for assessment (505-1(d)) ☐ Yes ☒ No

ANDA REMS acceptable?

☒ Yes ☐ No ☐ n/a

Background and Summary

1. The CBE-0 supplemental application provides revised insert to be in accordance with the reference listed drug (RLD), Wellbutrin XL®, NDA 021515/S-027, approved July 26, 2011.

2. Model labeling: Wellbutrin XL®, NDA 021515/S-027, approved July 26, 2011.

NDAs 21515/S-026 & 22108/S-005 submitted as a “CBE” supplements

• Under **Precautions**, the addition of the following new subsection;

7.7 **Drug-Laboratory Test Interactions** False-positive urine immunoassay screening tests for amphetamines have been reported in patients taking bupropion. This is due to lack of specificity of some screening tests. False-positive test results may result even following discontinuation of bupropion therapy. Confirmatory tests, such as gas chromatography/mass spectrometry, will distinguish bupropion from amphetamines.

• Corollary changes to the **Medication Guide** regarding false positive test results for amphetamines.

NDAs 21515/S-027 & 22108/S-006 submitted as a “Prior Approval” supplements

• Revisions to CLINICAL PHARMACOLOGY: Metabolism and PRECAUTIONS: Drug Interactions – Information regarding drug-drug interactions between bupropion and drugs that inhibit or induce CYP2B6, such as ritonavir or efavirenz. In addition, information about potential interactions between bupropion and drugs which require metabolic activation by CYP2D6 in order to be effective (e.g., tamoxifen).

3. Patent/Exclusivity Statement:

Patent and Exclusivity Search Results from query on Appl No 021515 in the OB_Rx list.
Patent Data

Appl No	Prod No	Patent No	Patent Expiration	Drug Substance Claim	Drug Product Claim	Patent Use Code	Filed
N021515	001	6096341	Oct 30, 2018				IV

Exclusivity Data

There is no unexpired exclusivity for this product.

No labeling impact.

4. This drug product is subject to a USP monograph.
5. The DESCRIPTION and HOW SUPPLIED sections have not changed from the approval of ANDA 077415/S-017, approved August 30, 2011.

Review

The labeling supplement is acceptable. The RLD's and Impax's labeling are identical except for differences allowed by regulations.

Recommendation

The labeling supplement should be approved.

{see appended electronic signature}

Jeanne Skanchy
Labeling Reviewer

Supervisory Comment/Concurrence:

{see appended electronic signature}

John Grace
Team Leader

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

/s/

JEANNE SKANCHY
03/28/2012

JOHN F GRACE
03/29/2012

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 077415Orig1s018

ADMINISTRATIVE and CORRESPONDENCE
DOCUMENTS



30831 Huntwood Avenue, Hayward, CA 94544
(510) 476-2000 Fax (510) 471-3200
www.impaxlabs.com

September 06, 2011

Keith Webber, Ph.D., Acting Director
Office of Generic Drugs, CDER, FDA
Document Control Room, Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773

Supplement –
Changes Being Effectuated (CBE-0)

Re: ANDA 077415
Bupropion Hydrochloride Extended-Release Tablets (XL), 150 mg and 300 mg

Dear Dr. Webber:

In accordance with 21 CFR 314.94(a)(8)(iv), IMPAX Laboratories, Inc. hereby submits a Supplement - Changes Being Effectuated to the above-referenced ANDA, to provide an updated Final Printed Labeling for IMPAX's Bupropion Hydrochloride Extended-Release Tablets (XL), 150 mg and 300 mg professional package insert based on the July 25, 2011 FDA-approved reference listed drug labeling, WELLBUTRIN XL® (NDA 021515/S-026 & S-027).

For ease of review, a side-by-side comparison of the labeling changes is provided. For the convenience of the reviewer, the Word file is also provided.

Please note that the entire supplement is included electronically per OGD guidance. IMPAX has submitted a letter of Non-Repudiation to the Agency on May 27, 2008.

Should you have any additional questions regarding this supplement, please contact me by telephone (510-240-6133), by telefax (510-240-6126), or by email (mwong@impaxlabs.com).

Sincerely,
IMPAX Laboratories, Inc.

Michelle Wong

Digitially signed by Michelle Wong
DN: cn=Michelle Wong, o=IMPAX, Inc., ou=IMPAX Trust Network,
www.impaxlabs.com, email=Michelle.Wong@impaxlabs.com, c=US
Person: Michelle Wong, Digital ID Class 1 - Microsoft Full Control,
email=Michelle.Wong@impaxlabs.com
Reason: I am approving this document
Date: 2011.09.06 11:38:10 -07'00'

Michelle P. Wong, Ph.D.
Senior Director, Regulatory Affairs