



ANDA 78-957

InvaGen Pharmaceuticals, Inc.
U.S. Agent for: Hetero Drugs Limited, Unit III
Attention: Sudhakar Rao Vidiyala, Ph.D.
President
7 Oser Avenue
Hauppauge, NY 11788

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) dated March 31, 2007, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Stavudine Capsules USP, 15 mg, 20 mg, 30 mg, and 40 mg.

Reference is also made to the tentative approval letter issued by our office on February 28, 2008 and to your amendments dated May 16, 2007, and July 16, October 16, October 23, December 12 and December 18, 2008.

This ANDA was reviewed under the expedited review provisions of the President's Emergency Plan for AIDS Relief (PEPFAR).

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 Stavudine Capsules USP, 15 mg, 20 mg, 30 mg, and 40 mg, to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug, Zerit Capsules, 15 mg, 20 mg, 30 mg, and 40 mg, respectively, of Bristol Myers Squibb Company Pharmaceutical Research Institute. Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

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.

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 505-1(i).

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
Division of Drug Marketing, Advertising, and Communications
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 Division of Drug Marketing, Advertising, and Communications with a completed Form FDA 2253 at the time of their initial use.

Within 14 days of the date of this letter, submit updated content of labeling [21 CFR 314.50(1)] in structured product labeling (SPL) format, as described at <http://www.fda.gov/oc/datacouncil/spl.html>, that is identical in content to the approved labeling. Upon receipt and verification, we will transmit that version to the National

Library of Medicine for public dissemination. For administrative purposes, please designate this submission as "***Miscellaneous Correspondence - SPL for Approved ANDA 78-957***".

Sincerely yours,

{See appended electronic signature page}

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