DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville, MD 20857

ANDA 202884

Apotex Corp.
U.S. Agent for: Apotex Inc.
Attention: Kiran Krishnan
Director, North American Regulatory Affairs
2400 N. Commerce Parkway, Suite 400
Weston, FL 33326

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) dated March 26, 2010, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Candesartan Cilexetil and Hydrochlorothiazide Tablets, 16 mg/12.5 mg, 32 mg/12.5 mg and 32 mg/25 mg.

Reference is also made to your amendments dated April 1, and November 17, 2011; January 30, July 6, October 11, October 12, and November 19, 2012.

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, your Candesartan Cilexetil and Hydrochlorothiazide Tablets, 16 mg/12.5 mg and 32 mg/12.5 mg, are approved, effective on the date of this letter. However, because of the exclusivity issue explained below, we are unable to grant final approval at this time to your Candesartan Cilexetil and Hydrochlorothiazide Tablets, 32 mg/25 mg strength. Your Candesartan Cilexetil and Hydrochlorothiazide Tablets, 32 mg/25 mg, are tentatively approved.

The RLD upon which you have based your ANDA, AstraZeneca's Atacand-HCT Tablets, is subject to periods of patent protection. The following unexpired patents and expiration dates are currently listed in the agency's publication titled Approved Drug Products with Therapeutic Equivalence Evaluations (the "Orange Book"):

U.S. Patent Number	Expiration Date
5,534,534 (the '534 patent)	January 9, 2014*
5,958,961 (the '961 patent)	June 6, 2014
5,721,263 (the '263 patent)	February 24, 2015

*pediatric exclusivities added

Your ANDA contains paragraph IV certifications under section 505(j)(2)(A)(vii)(IV) of the Act stating that each of these patents is invalid, unenforceable, or will not be infringed by your manufacture, use, or sale of Candesartan Cilexetil and Hydrochlorothiazide Tablets, 16 mg/12.5 mg, 32 mg/12.5 mg and 32 mg/25 mg, under this ANDA. You have notified the agency that Apotex Inc. (Apotex) complied with the requirements of section 505(j)(2)(B) of the Act, and that no action for infringement of any patent was brought against Apotex within the statutory 45-day period.

I. Approval of Candesartan Cilexetil and Hydrochlorothiazide Tablets, 16 mg/12.5 mg and 32 mg/12.5 mg.

The Division of Bioequivalence has determined your Candesartan Cilexetil and Hydrochlorothiazide Tablets, 16 mg/12.5 mg and 32 mg/12.5 mg, to be bioequivalent and, therefore, therapeutically equivalent to the RLD, Atacand-HCT Tablets, 16 mg/12.5 mg and 32 mg/12.5 mg, respectively. 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.

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.

II. Tentative Approval of Candesartan Cilexetil and Hydrochlorothiazide Tablets, 32 mg/25 mg.

We are unable at this time to grant final approval of your 32 mg/25 mg strength of the drug product. Prior to the receipt of your ANDA insofar as this strength, another ANDA applicant submitted an ANDA for Candesartan Cilexetil and Hydrochlorothiazide Tablets, 32 mg/25 mg, containing a paragraph IV certification. This other ANDA, therefore, is eligible for 180-day generic drug exclusivity under section 505(j)(5)(B)(iv) for Candesartan Cilexetil and Hydrochlorothiazide Tablets, 32 mg/25 mg. Your ANDA insofar as the 32 mg/25 mg strength will be eligible for final approval upon the expiration of the other applicant's 180-day exclusivity, or that exclusivity is otherwise resolved.

Our decision to tentatively approve your Candesartan Cilexetil and Hydrochlorothiazide Tablets, 32 mg/25 mg, is based upon information currently available to the agency, i.e., data in your ANDA and the status of current good manufacturing practice (cGMP) of the facilities used in the manufacture and testing of the drug product. This decision is subject to change on the basis of new information that may come to our attention.

To reactivate your ANDA for the 32 mg/25 mg strength prior to final approval, please submit a "Final Approval Request Amendment to Original #2" 90 days prior to the date you believe that this product will be eligible for final approval. Your amendment must provide a summary of the legal basis upon which you believe the ANDA should be approved, as well as:

1. updated information related to final-printed labeling or chemistry, manufacturing and controls data, or any other change in the conditions outlined in this ANDA, or
2. a statement that no such changes have been made to the ANDA since the date of tentative approval.

Any changes in the conditions outlined in this ANDA and the status of the manufacturing and testing facilities' compliance with current good manufacturing practice (cGMP) are subject to Agency review before final approval of your Candesartan Cilexetil and Hydrochlorothiazide Tablets, 32 mg/25 mg, will be made. Such changes should be categorized as representing either "major" or "minor" changes, and they will be reviewed according to OGD policy in effect at the time of receipt.

In addition to the amendment requested above, the agency may request at any time prior to the final date of approval that you submit an additional amendment containing the requested information. Failure to submit either amendment may result in rescission of this tentative approval determination, or delay in issuance of the final approval letter.

Your Candesartan Cilexetil and Hydrochlorothiazide Tablets, 32 mg/25 mg, may not be marketed without final agency approval under section 505 of the Act. The introduction or delivery for introduction into interstate commerce of a drug before the effective final approval date is prohibited under section 301 of the Act. Also, until the agency issues the final approval letter, the 32 mg/25 mg strength product will not be listed in the "Orange Book."

For further information on the status of this ANDA, or prior to submitting additional supplements, please contact Dat Doan, Pharm.D., Project Manager, at 240-276-9336.

Sincerely yours,

{See appended electronic signature page}

Gregory P. Geba, M.D., M.P.H.
Director
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/

GREGORY P GEBA
12/04/2012