DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 205425 **TENTATIVE APPROVAL**

Cipla USA, Inc.
Attn: Monique Weitz, Head of Regulatory Affairs-US
U.S. Agent for Cipla Ltd.
9100 S. Dadeland Blvd., Suite 1500
Miami, FL 33156

Dear Ms. Weitz:

Please refer to your New Drug Application (NDA) 205425 dated June 24, 2013, received July 2, 2013, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for the following drug product:

- Lopinavir and Ritonavir Oral Pellets, 40 mg/10 mg

We also acknowledge receipt of your submissions dated:

January 25, 2013	May 13, 2013	July 23, 2013
August 29, 2013	October 7, 2013	October 31, 2013
November 7, 2013	November 27, 2013	December 6, 2013
January 24, 2014	November 21, 2014	January 15, 2015
April 10, 2015	April 30, 2015	May 18, 2015
May 20, 2015		

This NDA provides for the use of Lopinavir and Ritonavir Oral Pellets, 40 mg/10 mg, in combination with other antiretrovirals for the treatment of HIV-1 infection in pediatric patients.

This NDA was reviewed under the President's Emergency Plan for AIDS Relief (PEPFAR).

We completed our review of this application. It is **tentatively approved** under 21 CFR 314.105 for use as recommended in the agreed-upon labeling (refer to the enclosed text for the prescribing information, medication guide, and container labels). Based on the data provided, the expiration dating period for Lopinavir and Ritonavir Oral Pellets, 40 mg/10 mg, is (b) (4) months when packaged (b) (4) and stored (b) (4)

This determination is based upon information available to the Agency at this time [i.e., information in your application and the status of current good manufacturing practices (cGMPs)

of the facilities used in manufacturing and testing of the drug product]. This determination is subject to change on the basis of any new information that may come to our attention.

The listed reference drug product [Kaletra® (lopinavir/ritonavir)] upon which you base your application is subject to a period of patent and exclusivity protection and therefore, final approval of your application under section 505(c)(3) of the Act [21 U.S.C. 355(c)(3)] may not be made effective until the period has expired. If you have questions as to when this date will be, please contact the Agency at the information provided below.

Two or six months prior to the expiration of the patent and exclusivity protection, as appropriate, submit an amendment to this application identifying changes, if any, in the conditions under which your product was tentatively approved. Any changes to the conditions outlined in this NDA require our review before final approval and the goal date for our review will be set accordingly. Your amendment should include updated labeling, chemistry, manufacturing and controls data, and a safety update. This amendment should include draft final printed labels and labeling which comply with all U.S. regulations (uniqueness of drug product appearance per 21 CFR 206; child-resistant packaging per 16 CFR 1700, etc.). This amendment should be designated clearly in your cover letter as a "**FINAL APPROVAL REQUESTED**."

We remind you that you are expected to comply with the reporting requirements provided in 21 CFR 314.80 and 314.81. If the product is to be mass distributed in developing countries, a system of collecting and reporting adverse drug reactions by the distributor would be desirable (e.g., through governmental or nongovernmental agencies distributing the products).

We also remind you that, should you intend to market this product in the United States after the period of patent and exclusivity protection, you are required to comply with all applicable U.S. legislation, including the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), which requires that all NDAs, Biological License Applications (BLAs), or supplemental applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration contain a pediatric assessment unless this requirement is waived, deferred, or inapplicable. A pediatric assessment contains data gathered from pediatric studies using appropriate formulations for each age group for which the assessment is required, and other data that are adequate to: 1) assess the safety and effectiveness of the product for the claimed indications in all relevant pediatric subpopulations and 2) support dosing and administration for each pediatric subpopulation for which the product has been assessed to be safe and effective. You must also join the antiretroviral pregnancy registry at that time and make the appropriate labeling change that references the existence of the pregnancy registry. In addition, an updated package insert (PI) must be submitted under the Structured Product Labeling requirements (http://www.fda.gov/oc/datacouncil/spl.html) as defined by the Physician's Labeling Rule [21 CFR 201.56, 201.57].

Until we issue a final approval letter, this NDA is not deemed approved. If you believe that there are grounds for issuing the final approval letter before the period of patents' protection has expired, you should amend your application accordingly.

Please note that this drug product may not be marketed in the United States without final Agency approval under Section 505 of the Act. The introduction or delivery for introduction into interstate commerce of this drug product before the final approval date is prohibited under Section 501 of the Act and 21 U.S.C. 331(d).

If you have any questions, please contact David Araojo, Pharm.D., Senior Program Consultant, at (301) 796-0669.

Sincerely yours,

{See appended electronic signature page}

Jeffrey Murray, M.D., M.P.H.
Deputy Director
Division of Antiviral Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

Enclosures: Draft PI, Medication Guide, and container labels

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

/s/

JEFFREY S MURRAY
05/21/2015