NDA 211635/S-012

CORRECTED APPROVAL LETTER

Neurelis, Inc.
c/o Pacific-Link Consulting
Attention: Richard Lowenthal, MS, MSA (MSEL)
President
8195 Run of the Knolls Court
San Diego, CA 92127

Dear Richard Lowenthal:

Please refer to your Supplemental New Drug Application (sNDA) dated and received December 18, 2024, and your amendment, pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Valtoco (diazepam) nasal spray.

We also refer to our approval letter dated June 14, 2025, which contained the following errors in the Full Prescribing Information:

- Section 2.2, Dosing Information, the June 14, 2025, approval letter contained dosing of "0.2 mg/kg or 0.3 mg/kg". This CORRECTED approval letter contains dosing information of "0.2 mg/kg to 0.5 mg/kg" as seen in NDA 211635/S-10 approved on April 15, 2025.
- Section 2.3, Important Administration Instructions, the June 14, 2025, approval letter contained, "VALTOCO is a ready-to-use nasal spray device. VALTOCO nasal spray delivers its entire contents upon activation". This CORRECTED approval letter contains "VALTOCO nasal spray delivers its entire contents upon activation" as seen in NDA 211635/S-10 approved on April 15, 2025.
- Section 6.1, Clinical Trials Experience, the June 14, 2025, approval letter contained, "A total of 255 patients 2 years of age and older received VALTOCO, of whom 134 received VALTOCO for at least 1 year". This CORRECTED approval letter contains, "A total of 255 patients 2 years of age and older received VALTOCO, of whom 143 received VALTOCO for at least 1 year" as seen in NDA 211635/S-10 approved on April 15, 2025.
- Section 8.4, Pediatric Use, the June 14, 2025, approval letter contained, "an open-label safety study of VALTOCO including patients 2 years to 16 years of age". This CORRECTED approval letter contains, "open-label safety studies of VALTOCO including patients 2 years to 16 years of age" as seen in NDA 211635/S-10 approved on April 15, 2025.
- Section 11, Description, the June 14, 2025, approval letter contained, "Diazepam, the active ingredient of VALTOCO nasal spray, is a benzodiazepine anticonvulsant with the chemical name 7-chloro-1,3-dihydro-1-methyl-5-phenyl-2H-1,4-benzodiazepin-2-one". This CORRECTED approval letter contains, "Diazepam, the active ingredient of VALTOCO nasal spray, is a benzodiazepine anticonvulsant with the chemical name 7-chloro-1,3-dihydro-1-methyl-5-phenyl-2H-

1,4-benzodiazepin-2-one; its molecular formula is $C_{16}H_{13}ClN_2O$ and its molecular weight is 284.7 g/mol."

- Section 12.3, Pharmacokinetics, the June 14, 2025, approval letter contained, "adult and pediatric patients with epilepsy 6 years of age and older". This CORRECTED approval letter contains, "adult and pediatric patients with epilepsy 2 years of age and older" as seen in NDA 211635/S-10 approved on April 15, 2025.

This corrected action letter incorporates the correction of the errors. The effective action date will remain June 14, 2025, the date of the original letter.

This "Changes Being Effected in 30 days" supplemental new drug application provides for the following changes:

- Addition of a new packaging configuration for Valtoco nasal spray pump across all strengths, consisting of five blisters per carton, in addition to the existing two-blister carton. This change includes an update to the carton NDC number, while the blister NDC number remains unchanged, as there is no change to the formulation.
- Inclusion of updates to the Prescribing Information specifically, the expansion of the Valtoco nasal spray pump indication to include patients with epilepsy aged 2 years and older as previously approved in Supplement #0010. These updates are being incorporated into the Prescribing Information revisions currently under review in Supplement #0012.
- Inclusion of updates to the Medication Guide reflecting the expanded indication of Valtoco nasal spray pump for patients with epilepsy 2 years of age and older, as approved in Supplement #0010. These updates are also being incorporated into the revisions currently under review in Supplement #0012.

APPROVAL & LABELING

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information, and Medication Guide) with the addition of any labeling changes in pending "Changes Being Effected" (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

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.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes, and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

CARTON AND CONTAINER LABELS

Submit final printed carton labels that are identical to enclosed carton labels submitted on April 8, 2025, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format – Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*. For administrative purposes, designate this submission "**Product Correspondence – Final Printed Carton Labels for approved NDA 211635/S-012.**" Approval of this submission by FDA is not required before the labeling is used.

We remind you that you must comply with reporting requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, contact Erica Keafer, Regulatory Business Process Manager, at (301) 796 – 1435 or erica.keafer@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Vilayat Sayeed, Ph.D.
Director
Division of Product Quality Assessment II
Office of Product Quality Assessment I
Office of Pharmaceutical Quality
Center for Drug Evaluation and Research

Enclosure(s):

- Content of Labeling
  - Prescribing Information
  - Medication Guide
- Carton Labeling

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

VILAYAT A SAYEED
10/21/2025 04:57:31 PM
Corrected action letter