DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 010997/S-051/S-052
NDA 016862/S-041/S-042
NDA 017122/S-061/S-062

SUPPLEMENT APPROVAL

Xanodyne Pharmaceutical, Inc.
One Riverfront Place
Newport, KY 41071-4563

Attention: Arthur C. Ilse
Director, Regulatory Affairs

Dear Mr. Ilse:

Please refer to your supplemental new drug applications dated August 4, 2009, received August 5, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Darvon (propoxyphene hydrochloride) Capsules, Darvon-N (propoxyphene napsylate) Tablets and Darvocet-N (propoxyphene napsylate and acetaminophen) Tablets.

Reference is also made to our letter dated July 7, 2009, notifying you, under Section 505(o)(4) of the FDCA, of new safety information, some of which we believed should be included in the labeling for Darvon, Darvon-N and Darvocet-N. Based on this new safety information, we also notified you under Section 505-1 of the FDCA of the need to submit a Risk Evaluation and Mitigation Strategy (REMS) and conduct a postmarketing clinical trial. The new safety information pertains to the risk of overdose and the potential to affect cardiovascular events, including life-threatening arrhythmias, associated with the use of propoxyphene products.

We acknowledge receipt of your submissions dated September 11, 2009.

SAFETY LABELING CHANGES

Supplements S-052/S-042/S-061 provide for revisions to the labeling for Darvon, Darvon-N and Darvocet-N, respectively, consistent with our letter dated July 7, 2009.

We also refer to the email correspondences between FDA and (b) (4) dated September 2 and 3, 2009, in which agreement was reached on these safety labeling changes.

We have completed our review of these supplemental applications, as amended. These applications are approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

As soon as possible, but no later than 14 days from the date of this letter, please submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at http://www.fda.gov/oc/datacouncil/spl.html, that is identical to the enclosed labeling (text for the package insert, text for the patient package insert, Medication Guide). Upon receipt, we will transmit that version to the National Library of Medicine for public dissemination. For administrative purposes, please designate this submission, "**SPL for approved NDA 010997/S-052, NDA 016862/S-042, NDA 017122/S-061**."

We request that the revised labeling approved today be available on your website within 10 days of receipt of this letter.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

Supplements S-051/S-041/S-062 included a proposed REMS. Your revised proposed REMS, submitted on September 11, 2009, and appended to this letter, is approved. The REMS consists of a Medication Guide and a timetable for submission of assessments of the REMS.

The REMS assessment plan should include but is not limited to the following:

a. Patients' understanding of the serious risks of Darvon, Darvon-N and Darvocet-N.

b. A report on periodic assessments of the distribution and dispensing of the Medication Guide in accordance with 21 CFR 208.24.

c. A report on failures to adhere to distribution and dispensing requirements, and corrective actions taken to address noncompliance.

The requirements for assessments of an approved REMS under section 505-1(g)(3) include, in section 505-1(g)(3)(B) and (C), information on the status of any post-approval study or clinical trial required under section 505(o) or otherwise undertaken to investigate a safety issue. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 314.81(b)(2)(vii) and including any updates to the status information since the annual report was prepared. Failure to comply with the REMS assessments provisions in 505-1(g) could result in enforcement action.

We remind you that in addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in Section 505-1(g)(2)(A) of FDCA.

Prominently identify the submission containing the REMS assessments or proposed modifications with the following wording in bold capital letters at the top of the first page of the submission:

NDA 010997/016862/017122 REMS ASSESSMENT

NEW SUPPLEMENT FOR NDA 010997/016862/017122
PROPOSED REMS MODIFICATION
REMS ASSESSMENT

NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR NDA 010997/016862/017122
REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)

If you do not submit electronically, please send 5 copies of REMS-related submissions.

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

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
Division of Drug Marketing, Advertising, and Communications
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 Division of Drug Marketing, Advertising, and Communications (DDMAC), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

LETTERS TO HEALTH CARE PROFESSIONALS

If you issue a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH
Food and Drug Administration
Suite 12B05
5600 Fishers Lane
Rockville, MD 20857

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have any questions, contact Ayanna Augustus, Regulatory Project Manager, at ayanna.augustus@fda.hhs.gov or (301) 796-3980.

Sincerely,

{See appended electronic signature page}

Sharon Hertz, M.D.
Deputy Director
Division of Anesthesia, Analgesia
and Rheumatology Drugs
Office of New Drugs II
Center for Drug Evaluation and Research

Enclosure:

1. Package Inserts
2. Medications Guides
3. REMS

Application Type/Number	Submission Type/Number	Submitter Name	Product Name
NDA-10997	SUPPL-51	XANODYNE PHARMACEUTICS INC	DARVON (PROPOXYPHENE HYDROCHLROIDE) CAPS
NDA-10997	SUPPL-52	XANODYNE PHARMACEUTICS INC	DARVON (PROPOXYPHENE HYDROCHLROIDE) CAPS
NDA-16862	SUPPL-41	XANODYNE PHARMACEUTICS INC	DARVON-N TABLETS
NDA-16862	SUPPL-42	XANODYNE PHARMACEUTICS INC	DARVON-N TABLETS
NDA-17122	SUPPL-61	XANODYNE PHARMACEUTICS INC	DARVOCET-N 100
NDA-17122	SUPPL-62	XANODYNE PHARMACEUTICS INC	DARVOCET-N 100

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

/s/

SHARON H HERTZ
09/25/2009