



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 022025/S-013

SUPPLEMENT APPROVAL

Regulus Pharmaceutical Consulting, Inc.
Attention: Clara Li
US Agent for Apricus Pharmaceuticals USA, Inc.
4840 Pearl East Circle, Suite 201E
Boulder, CO 80301

Dear Ms. Li:

Please refer to your Supplemental New Drug Application (sNDA) dated August 29, 2012, received August 30, 2012, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Totect[®] (dexrazoxane) for Injection, 500 mg.

We acknowledge receipt of your amendments dated September 19, 2012, November 28, 2012, January 21, 2013, February 7, 2013, and February 22, 2013.

S-013 "Changes Being Effectuated" supplemental new drug application provides for the following revisions:

1. Carton and container labels for new presentations:

- 1-pack cartons (containing 2 vials total – 1 Totect and 1 diluent)
- 4-pack cartons (containing 8 vials total – 4 Totect and 4 diluent)

2. Package insert revised to include the 2 new presentations

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 text.

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 package insert, carton and container labels), with the addition of any labeling changes in pending "Changes Being Effectuated" (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 from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that includes 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(1)(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).

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion (OPDP)
5901-B Ammendale Road
Beltsville, MD 20705-1266

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at <http://www.fda.gov/opacom/morechoices/fdaforms/cder.html>; instructions are provided on page 2 of the form. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

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, call Alice Kacuba, RN, MSN, RAC, Chief, Project Management Staff, at (301) 796-1381.

Sincerely,

{See appended electronic signature page}

Amna Ibrahim, M.D.
Deputy Director
Division of Oncology Products 1
Office of Hematology and Oncology Products
Center for Drug Evaluation and Research

ENCLOSURE(S): Content of Labeling, Carton 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/

AMNA IBRAHIM
04/26/2013