

May 29, 2002

Dockets Management Branch
Food and Drug Administration 4590 02 MAY 30 10:00
Department of Health and Human Services
Room 1061
5630 Fishers Lane
Rockville, MD 20852

CITIZEN PETITION



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The undersigned, on behalf of a client, submits this petition in triplicate pursuant to 21 U.S.C. 355(j)(2)(C) and 21 CFR 10.30 and 314.93. Petitioner requests that the Food and Drug Administration (FDA) determine that 50 mg tablets of Clozapine Tablets are suitable for an Abbreviated New Drug Application (ANDA) based on the listed drug Clozaril® Tablets, 25 mg.

A. ACTION REQUESTED

Petitioner seeks a determination that a 50 mg Clozapine Tablet drug product is suitable for an ANDA based on the listed drug Clozaril® Tablets, 25 mg.

B. STATEMENT OF GROUNDS

The reference listed drug for the proposed generic drug product is Clozaril® Tablets (clozapine), 25 mg. The recommended starting dose for CLOZARIL® (clozapine) Tablets is one-half of a 25 mg tablet once or twice daily, then continued with daily dosage increments of 25-50 mg/day, if well-tolerated, to achieve a target dose of 300-450 mg/day (3-100 mg tablets/day up to 4-100 mg and 2-25 mg tablets) by the end of two weeks. Many patients respond adequately at doses between 300-600 mg/day. It may be necessary to raise the dose to the 600-900 mg/day range to obtain an acceptable response.

For 10% of the patients taking Clozaril®, 25 mg taken 1 to 2 times per day is a sufficient dose. See IMS Audit (March 2002) (Attachment A). Within this cohort, 82% take 2 tablets per day. In fact, the 100 mg version of Clozaril® (clozapine) tablet is scored, to make it possible for patients to cut the tablet in half to make a 50 mg dose. The availability of 50 mg clozapine tablets will make it easier and more convenient for patients prescribed smaller daily doses of clozapine tablets to take their medication. Therefore, petitioner seeks a determination that clozapine tablets, 50 mg, is suitable for an ANDA, with Clozaril® tablets, 25 mg as the reference listed drug (RLD).

The active ingredient of the proposed drug product will be the same as that in Clozaril® tablets. Because the proposed drug product is dose proportional and contains the same active and inactive ingredients, it should be bioequivalent to Clozaril® Tablets. The proposed drug product is expected to have the same therapeutic effect as Clozaril® Tablets when administered to patients under the

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same conditions of use. In accordance with FDA regulations and policies, the client will request a bioequivalency waiver in its ANDA submission.

Pursuant to 21 CFR 314.93 (d), a copy of the approved labeling for Clozaril ® Tablets is included (Attachment B). A copy of the proposed labeling for a generic 50 mg strength of that drug product is also included (Attachment C). No changes to the labeling are necessary other than those necessitated by the different strength and manufacturer. The brand name Clozaril ® Tablets will be deleted, and descriptions of the strength and tablet and references to the manufacturer of Clozaril ® Tablets will be modified.

C. ENVIRONMENTAL IMPACT

Pursuant to 21 CFR 25.31(a), this petition qualifies for a categorical exclusion from the requirement for submission of an environmental assessment.

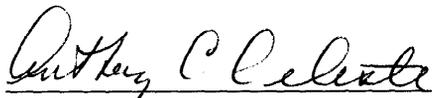
D. ECONOMIC IMPACT

According to 21 CFR 10.30 (b), information on economic impact is to be submitted only when requested by the Commissioner following review of this petition.

E. CERTIFICATION

The undersigned certifies, that, to the best knowledge and belief of the undersigned, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner which are unfavorable to the petition.

Respectfully submitted,



Anthony C. Celeste
President

Attachments