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FILE NO: 67037.000002

February 28, 2006

Federal Express

Division of Dockets Management
Food and Drug Administration
5630 Fishers Lane, Room 1061 (HFA-305)
Rockville, MD, 20852

**Re: Notice of Intent to File Comments of Behalf of Xanodyne Pharmaceuticals, Inc.
Concerning Citizen Petition Docket No. 2006P-0090**

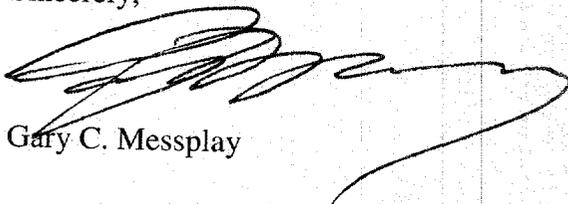
Dear Sir/Madam:

We are writing on behalf of our client, Xanodyne Pharmaceuticals, Inc. The company and its counsel has reviewed the above referenced Citizen Petition concerning propoxyphene and propoxyphene-containing products, and are in the process of preparing formal comments for submission to the docket. We trust that the Agency will not issue a response to the Petitioners until such comments are received.

We firmly believe it is important for propoxyphene and propoxyphene-containing products to remain on the market. The Petition is without merit and should be denied.

We will submit substantive comments on the Citizen Petition as soon as practicable.

Sincerely,



Gary C. Messplay

cc: Daniel O'Korn, Esq.
General Counsel
Xanodyne Pharmaceuticals, Inc.

2006P-0090

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