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2006 JUL 19 P1:35

**Wyeth**

July 19, 2006

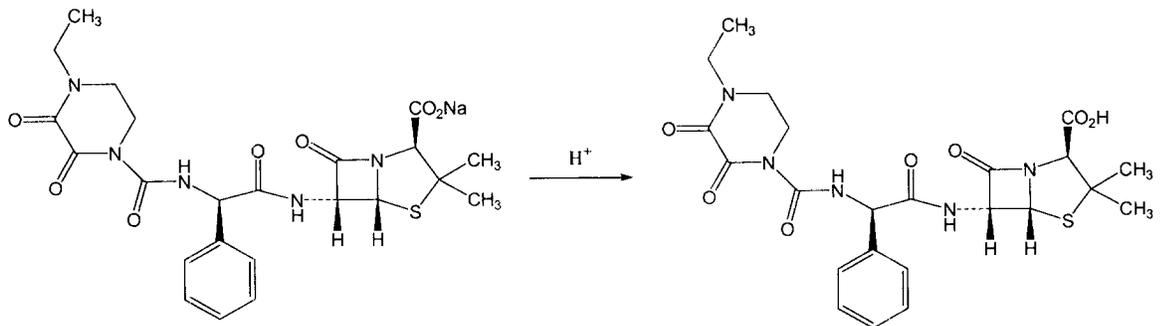
Division of Dockets Management  
Food and Drug Administration  
Department of Health and Human Services  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Re: Docket 2006P-0173; Second Supplement, Clarifying and Correcting  
Citizen Petition

Dear Sir or Madam:

Wyeth hereby submits additional information to supplement its Citizen Petition submitted on April 25, 2006 (Docket No. 2006P-0173). In that petition, Wyeth included several figures, one depicting the conversion of soluble piperacillin sodium into an insoluble free acid (Figure 1 of the Citizen Petition) and one depicting the formation of a piperacillin dimer following hydrolysis of piperacillin molecules (Figure 2 of the Citizen Petition). Wyeth wishes to now clarify and correct those figures by replacing them with the following Figures 1 and 2.

**Figure 1**  
**Conversion of Soluble Piperacillin Sodium into an Insoluble Free Acid**



2006P-0173

SUP 2

Figure 1 has been revised to conform to the manner in which piperacillin is graphically depicted in the Zosyn® package insert. In addition, Figure 1 has been corrected to (1) close the piperacillin beta-lactam ring, which was partially opened in the original figure, and (2) remove certain typographical errors.

**Figure 2**  
**Hydrolysis of Piperacillin Followed by Formation of Piperacillin Dimer**

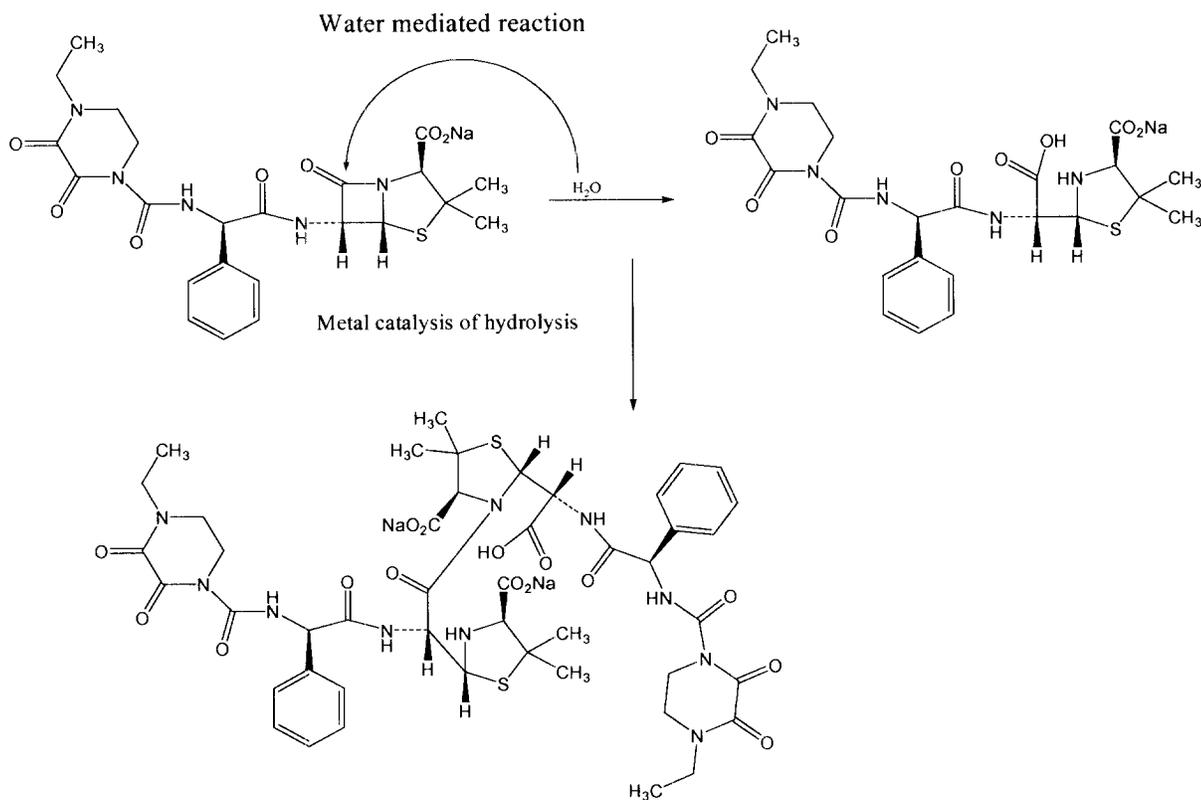


Figure 2 has also been revised to conform to the manner in which piperacillin is graphically depicted in the Zosyn® package insert. In addition, Figure 2 has been corrected to remove certain typographical errors.

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The changes made to Figures 1 and 2 do not affect the substantive discussion in our Citizen Petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Geoffrey M. Levitt". The signature is written in a cursive style with some stylized flourishes.

Geoffrey M. Levitt  
Vice President & Chief Counsel  
Regulatory and Research