This document lists observations made by the FDA representative(s) during the inspection of your facility. They are inspectional observations, and do not represent a final Agency determination regarding your compliance. If you have an objection regarding an observation, or have implemented, or plan to implement, corrective action in response to an observation, you may discuss the objection or action with the FDA representative(s) during the inspection or submit this information to FDA at the address above. If you have any questions, please contact FDA at the phone number and address above.

DURING AN INSPECTION OF YOUR FIRM WE OBSERVED:
Laboratory Systems

OBSERVATION 1
Testing and release of drug product for distribution do not include appropriate laboratory determination of satisfactory conformance to the final specifications prior to release.

Specifically, in testing results of (b)(4) Powder (b)(4) mg packed in sachets for exhibit batches lots (b)(4), (b)(4), and (b)(4) we observed:

1. On 16 December 2015, the initial release testing results was generated using manual integration for related substance testing for all three exhibit batches.

2. Different processing methods were used to process system suitability solution, standard, and sample injections for the following release testing and stability samples:

A. (b)(4) Powder
   - release testing
     - (b)(4), (b)(4), and (b)(4)
   - accelerated samples
     - 3 month, lots (b)(4)
     - 6 month, lots (b)(4)
     - 5 month, lots (b)(4) and (b)(4)

SEE REVERSE OF THIS PAGE

Stacie A Woods, Investigator
Lata C Mathew, Generic Drug User Fee Amendments (GDUFA)

DATE ISSUED 6/16/2017
In addition, related substance for assay testing for [redacted], which is a component in [redacted] Powder [redacted], was also processed using separate processing methods for system suitability solution, standard, and sample injections during the 3 and 6 month long term and accelerated stability samples, and 5 month accelerated stability sample of exhibit lots [redacted] [redacted] [redacted].

C. [redacted] Tablets

- [redacted] [redacted] [redacted] [redacted] [redacted] [redacted] [redacted] [redacted] for initial release testing sample.
- [redacted] [redacted] [redacted] for initial release testing sample.

Signed: [Signature] 6/16/17