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August 9, 2024

**Center for Drug Evaluation and Research  
Food and Drug Administration  
Metro Park North VII  
7620 Standish Place  
Rockville, MD 20855**

**RESPONSE TO PREA  
NON-COMPLIANCE LETTER**

**Reference:** **NDA 200534**  
**Oxycodone Hydrochloride Capsules, 5 mg CII**  
**Response to PREA Non-Compliance Letter**  
**Sequence 0139**

Dear Madam/Sir:

Reference is made to NDA 200534, Oxycodone Hydrochloride Capsules, 5 mg, held by Genus Lifesciences Inc. (Genus), approved on October 10, 2010 and the associated Postmarketing Requirement (PMR) under the Pediatric Research Equity Act (PREA) 1698-1.

As previously agreed with the Division, additional cross-reference is made to Genus' collaborative partner [REDACTED] (b) (4) for Oxycodone Hydrochloride Oral Solution, 5 mg/5 mL.

Genus submitted a supplemental New Drug Application (sNDA) to the aforementioned NDA on January 17, 2020 to satisfy the full requirement for the PMR 1698-2. Genus also received Fulfillment of Post Marketing Requirement from FDA dated July 21, 2021 indicating that the requirements for PMR 1698-2 were fulfilled.

As committed within the PMRs, PMR 1698-2 must be completed and the final CSR submitted prior to initiating PMR 1698-1 to allow for the pharmacokinetic and safety data from this study, to dictate the proposed dosing for PMR 1698-1. Furthermore, during the teleconference with FDA held on May 23, 2019, the Agency discussed concerns with the proposed protocol for PMR 1698-1, submitted on August 17, 2017. As such, the updated Efficacy Study Protocol for PREA PMR 1698-1 was submitted on October 14, 2019.

Genus is completing the required PMR 1698-1 in collaboration with [REDACTED] (b) (4)

[REDACTED]

NDA 200534

Oxycodone Hydrochloride Capsule, 5 mg

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On December 6, 2023, Genus received guidance from Jaimin Patel, PharmD, Senior Regulatory Project Manager to submit a deferral extension request as the Agency has not yet made a determination regarding this study. Therefore, Genus submitted a deferral extension request on February 5, 2024 with a final report completion date of [REDACTED] (b) (4) and this request is currently under review.

The deferral request of [REDACTED] (b) (4) for study report completion is based on the anticipated time period necessary to reach an agreement with the Agency on the study protocol PREA PMR 1698-1 submitted October 14, 2019, the challenges associated with enrolling patients in the age group of 0 to < 2 years into an efficacy study with a pharmacokinetic component requiring multiple, sequential blood draws and the time required to prepare and finalize the study report including data compilation and analysis for submission of the sNDA.

Please do not hesitate to contact me by telephone at (610) 782-9780 ext. \*210 or by email at [breightler@genuslifesciences.com](mailto:breightler@genuslifesciences.com) or Sherry Schultz at (610) 841-2540 or by email at [sschultz@genuslifesciences.com](mailto:sschultz@genuslifesciences.com) with any questions or comments.

Sincerely,

*William Reightler*

William Reightler  
Vice President of Regulatory Affairs  
Genus Lifesciences Inc.

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The IT point of contact for this submission is:

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