NDA 50-667/S-020
NDA 50-668/S-022

King Pharmaceuticals, Inc.
Attention: Thomas K. Rogers, III
Vice President, Regulatory Affairs
501 Fifth Street
Bristol, TN 37620

Dear Mr. Rogers:

Please refer to your supplemental new drug applications dated August 25, 1999, received August 26, 1999, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for:

NDA 50-667/S-020 for Lorabid® (loracarbef) Oral Suspension
NDA 50-668/S-022 for Lorabid® (loracarbef) Capsules

We also refer to the Agency facsimile dated February 6, 2001 in which the Division recommended additional changes to the label, and to your facsimile of February 7, 2001 where you agreed to these recommended changes.

These supplemental new drug applications provide for the following changes to the *Geriatric Use* subsection under PRECAUTIONS.

1. The words "(see **CLINICAL PHARMACOLOGY**)" have been added to the end of the first sentence found in the current labeling.
2. The following statement has been added as the second sentence: "Of 3541 adult patients in controlled clinical studies of loracarbef, 705 (19.9%) were 65 years of age or older."
3. The words "these controlled" have been added to the next sentence (third) in front of "clinical studies".
4. The following statement has been added as the fourth sentence: "Loracarbef is known to be substantially excreted by the kidney."
5. The phrase "care should be taken in dose selection and" has been added to the last sentence between the words "renal function" and "evaluation".

We have completed the review of these supplemental applications, and have concluded that adequate information has been presented to demonstrate that the drug products are safe and effective for use as recommended in the agreed upon labeling text, and with the minor editorial revisions listed below.

As agreed in your facsimile dated February 7, 2001, the following additional changes will be incorporated into the label:

1. The following phrase will be added to the fourth sentence concerning excretion by the kidney, "and the risk of toxic reactions to this drug may be greater in patients with impaired renal function".
2. The **Geriatric Use** subsection will be revised as follows:

> "Geriatric Use – Healthy geriatric volunteers (≥65 years old) with normal renal function who received a single 400-mg dose of loracarbef had no significant differences in AUC or clearance when compared to healthy adult volunteers 20 to 40 years of age (*see* **CLINICAL PHARMACOLOGY**). Of 3541 adult patients in controlled clinical studies of loracarbef, 705 (19.9%) were 65 years of age or older. In these controlled clinical studies, when geriatric patients received the usual recommended adult doses, clinical efficacy and safety were comparable to results in non-geriatric patients.
>
> "Loracarbef is known to be substantially excreted by the kidney, and the risk of toxic reactions to this drug may be greater in patients with impaired renal function. Because significant numbers of elderly patients have decreased renal function, care should be taken in dose selection and evaluation of renal function in this population is recommended (see **DOSAGE AND ADMINISTRATION**)."

Accordingly, these supplemental applications are approved effective on the date of this letter.

The final printed labeling (FPL) must be identical, and include the minor editorial revisions indicated above, to the submitted draft labeling (package insert submitted August 25, 1999). These revisions are terms of the approval of these applications

Please submit 20 paper copies of the FPL as soon as it is available, in no case more than 30 days after it is printed to each application. Please individually mount ten of the copies on heavy-weight paper or similar material. Alternatively, you may submit the FPL electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDAs* (January 1999). For administrative purposes, these submissions should be designated "FPL for approved supplement NDA 50-667/S-020, and 50-668/S-022." Approval of these submissions by FDA is not required before the labeling is used.

In addition, please submit three copies of the introductory promotional materials that you propose to use for these products. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division and two copies of both the promotional materials and the package inserts directly to:

Division of Drug Marketing, Advertising, and Communications, HFD-42
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

If a letter communicating important information about these drug products (i.e., a "Dear Health Care

Professional" letter) is issued to physicians and others responsible for patient care, we request that you submit a copy of the letter to these NDA's and a copy to the following address:

MEDWATCH, HF-2
FDA
5600 Fishers Lane
Rockville, MD 20857

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, contact Cdr. R. Grant Hills, Regulatory Project Manager, at (301) 827-2125.

Sincerely,

Janice M. Soreth, M.D.
Acting Director
Division of Anti-Infective Drug Products
Office of Drug Evaluation IV
Center for Drug Evaluation and Research