DEPARTMENT OF HEALTH & HUMAN SERVICES



ANDA 77-220

Food and Drug Administration Rockville MD 20857

UCT 1 4 2005



Lannett Holdings, Inc. Attention: John H. Ryman

Regulatory Affairs Manager

9000 State Road

Philadelphia, PA 19136

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) dated July 22, 2004, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (Act), for Pilocarpine Hydrochloride Tablets, 5 mg.

Reference is also made to your amendments dated January 4, June 13, June 24, August 16, August 22, and September 28, 2005.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Pilocarpine Hydrochloride Tablets, 5 mg, to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Salagen® Tablets, 5 mg, of MGI Pharma Inc.). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your application.

Under Section 506A of the Act, certain changes in the conditions described in this abbreviated application require an approved supplemental application before the change may be made.

Postmarketing reporting requirements for this abbreviated application are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs should be advised of any change in the marketing status of this drug.

Promotional materials may be submitted to FDA for comment prior to publication or dissemination. Please note that these submissions are voluntary. If you desire comments on proposed launch promotional materials with respect to compliance with

applicable regulatory requirements, we recommend you submit, in draft or mock-up form, two copies of both the promotional materials and package insert(s) directly to:

Food and Drug Administration Center for Drug Evaluation and Research Division of Drug Marketing, Advertising, and Communications 5901-B Ammendale Road Beltsville, MD 20705-1266

We call your attention to 21 CFR 314.81(b)(3) which requires that all promotional materials be submitted to the Division of Drug Marketing, Advertising, and Communications with a completed Form FDA 2253 at the time of their initial use.

Sincerely yours,

Gary Buehler

Director

Office of Generic Drugs

Center for Drug Evaluation and Research