

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
PENSACOLA DIVISION**

IN RE: DEPO-PROVERA (DEPOT  
MEDROXYPROGESTERONE  
ACETATE) PRODUCTS LIABILITY  
LITIGATION

This Document Relates to:  
All Cases

Case No. 3:25-md-3140

Judge M. Casey Rodgers  
Magistrate Judge Hope T. Cannon

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**Joint Update and Proposed Agenda  
for July 11, 2025 Case Management Conference**

In advance of the July 11, 2025, Case Management Conference, the Parties jointly provide the following update and proposed agenda.

**I. Preemption/General Causation Discovery (Presentation to be made by Dave Buchanan and Doug Monsour for Plaintiffs, and Jessica Rydstrom for Pfizer).**

Since the prior Case Management Conference, Pfizer Inc., Pharmacia & Upjohn Co. LLC, and Pharmacia LLC (“Pfizer”) have continued to produce additional documents from custodial and noncustodial sources. As of this filing, Pfizer has completed production from 47 of 51 custodians, and has started, but not yet completed, production from the remaining 4 custodians. The Parties remain engaged in continuing efforts to work through issues regarding production.

Through the rolling privilege log process, Pfizer has now provided five privilege logs, totaling 8,344 entries. The fifth log, produced on June 30, 2025,

contained more than 7,000 entries. The Parties are working through issues Plaintiffs have raised regarding the logs and/or assertions of privilege.

**II. Proposed Order Requiring Filing of a Master Answer (Presentation to be made by Michael Sacchet for Plaintiffs and Joe Petrosinelli for Pfizer).**

In light of the number of actions filed to date and likely to be filed in the MDL, and the Pilot Case process directed by the Court, the Parties have agreed to a proposed order requiring each Defendants to file a General Answer for all non-Pilot Cases and plan to submit the proposal to the Court in advance of the Case Management Conference.

**III. Individual Proof of Use/Injury Collection (Presentation to be made by Julia Merrit for Plaintiffs).**

Pursuant to PTOs 17 and 22, individual plaintiffs have continued to provide the required threshold proof of use of Depo-Provera and meningioma diagnosis and have continued to proceed for the review process for identifying (and, if necessary, curing) potential deficiencies in the Questionnaire and threshold documentation submitted by each Plaintiff. To date, 163 plaintiffs have submitted complete proof of use/injury questionnaires.

**III. State Court Litigation Update (Presentation to be made by Katherine Cornell for Plaintiffs, and Annie Showalter for Pfizer).**

Cases concerning Depo-Provera and meningioma are currently pending in the following state courts:

- California (7 cases). The judge assigned to hear Defendants' motion to establish a coordinated proceeding for California state court cases, Judge Michael Markman in Alameda County Superior Court, has scheduled a hearing on the motion for July 24. Plaintiffs' response to the motion is due on July 11. On June 9, Pfizer removed a case originally filed in San Bernardino County (*Neaves v. Pfizer et al.*); the case was transferred to the MDL on June 30. Plaintiff's counsel has notified counsel for Pfizer that plaintiff intends to seek remand.
- New York (58 cases). The Parties are jointly seeking a coordinated proceeding, as well as a stay of the underlying cases pending coordination. The New York Litigation Coordinating Panel issued an Order to Show cause seeking any opposition or response to the Joint Petition by June 18. No oppositions were filed. The Parties have agreed to use Brown Greer's Centrality platform for the New York Litigation and Defendants have agreed to accept service via Centrality.
- Pennsylvania (1 case). Judge Carpenter (Philadelphia Court of Common Pleas, "PCCP") issued an order severing and dismissing the 100-plaintiff complaint filed in April 2025. Plaintiffs in that case then filed a voluntary dismissal of all claims. There is now one pending PCCP case, and as a result Defendants withdrew their motion seeking a coordinated proceeding.

- Illinois (1 case). The *Daniels* case, which was originally filed in state court in Illinois, was transferred to the MDL on June 10. Oral argument on the motions to dismiss by Pfizer and Walgreens, as well as Plaintiff's motion to remand, is scheduled for July 31. On July 3, Plaintiff's counsel moved to continue the hearing to a later date, or to conduct the hearing by Zoom. Counsel for Defendants Walgreens and Pfizer have told Plaintiff's counsel that Defendants are prepared to proceed on July 31, but also are available on August 22 (the next scheduled case management conference).
- New Mexico (case originally filed in Rio Arriba County was removed to the District of New Mexico on June 30; the case was conditionally transferred to the MDL on July 3)
- Delaware (1 case, filed by a pro se plaintiff)

DATED: July 7, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2025, I caused the foregoing Joint Update and Proposed Agenda for July 11, 2025 Case Management Conference to be filed with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record.

/s/ Joseph G. Petrosinelli  
Joseph G. Petrosinelli