BEFORE THE UNITED STATES JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

IN RE: DEPO-PROVERA (DEPOT MEDROXYPROGESTERONE ACETATE) PRODUCTS LIABILITY LITIGATION	MDL No. _____

MOTION OF PLAINTIFFS KRISTINA SCHMIDT, AJANNA LAWSON, MONIQUE JONES, HUYEN NGUYEN, TAYLOR DEVORAK, STACEY WILLIAMS AND CAREY J. WILLIAMS, TANYA EDGERTON, LATRIECE LOVE GOODLETT AND DAVID FOSTER GOODLETT, AND DEBRA MORROW FOR TRANSFER OF ACTIONS TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA PURSUANT TO 28 § 1407 AND JPML 6.2 FOR COORDINATED AND CONSOLIDATED PRETRIAL PROCEEDINGS

Pursuant to 28 U.S.C. § 1407 and Judicial Panel on Multi-District Litigation ("JPML") Rule 6.2, Plaintiffs Kristina Schmidt, Ajanna Lawson, Monique Jones, Huyen Nguyen, Taylor Devorak, Stacey Williams and Carey J. Williams, Tanya Edgerton, Latriece Love Goodlett and David Foster Goodlett, and Debra Morrow (collectively "Plaintiffs") respectfully move this Judicial Panel on Multi-District Litigation ("Panel") for an Order transferring the currently filed cases marked in the attached Schedule of Actions (collectively the "Actions"), as well as any cases subsequently filed involving similar facts or claims ("tag-along cases"), to the United States District Court for the Northern District of California.

In support of this motion, Plaintiffs aver the following, as more fully set forth in the accompanying Brief:

1. The Actions are listed on the Actions in accordance with the Panel's Rule 6.1(b)(ii); all complaints and federal district docket sheets in the Actions are attached hereto as Exhibits "1" through "22". The Actions allege numerous causes of action relating to the development of

meningioma, a brain tumor, in women after taking the contraceptive injection depot medroxyprogesterone acetate, known under the trade name Depo-Provera, and manufactured by the Defendants, as defined below.

2. Each of these Actions arise from the same or similar operative facts and wrongful conduct alleging that, as a result of receiving injections of Depo-Provera or generic variants, a high-dose progestin-based contraceptive manufactured and sold by a common defendant, Pfizer Inc. (hereinafter referred to as "Pfizer") and its affiliated "authorized generic" distributors, as well as other conventional generic manufacturers, Plaintiffs developed meningiomas, which are a type of brain tumor. This motion is also intended to encompass any future cases filed involving usage of Depo-Provera and the development of cerebral meningioma.

3. There are currently eight cases pending in the Central District of California; six cases pending in the Northern District of California; three cases pending in the Eastern District of California; and one case pending in each of the following: the Southern District of California, the Southern District of Indiana, the Western District of Missouri, the District of Nevada, and the District of Massachusetts.

4. Given the widespread usage of Defendants' Depo-Provera for the past forty decades, and the publication of epidemiology studies this year revealing a marked increased incidence of the meningioma tumor amongst past and present users of this medication, which will trigger discovery of cause statutes of limitations in many states, it is likely that many additional claimants will be or already have been harmed and additional similar actions will be filed in or removed to federal courts in the near future.

5. Upon information and belief, no discovery or court conferences have yet transpired in any of the filed cases. Therefore, no prejudice or inconvenience will result from the transfer, coordination, and consolidation of the related actions to the Northern District of California.

6. In each case, Plaintiffs allege that their usage of medroxyprogesterone acetate, Depo-Provera, a high-dose progestin injected in the deep tissue for contraception, resulted in their development of cerebral meningioma, a brain tumor, and sequalae related thereto, including but not limited to headaches, vision problems, seizures, and the need for radiation treatment or highly invasive intracranial surgery.

7. The complaints assert similar causes of action, including, but not limited to, negligence, negligent misrepresentation, breach of express warranty, breach of implied warranty, loss of consortium and services, strict liability – design defect, and strict liability – failure to warn.

8. The complaints involve similar factual allegations and, thus, any necessary discovery will arise from common questions of fact.

9. The transfer of the Actions will serve the convenience of the parties and witnesses and will promote the just and efficient conduct of such Actions by avoiding the possibility of inconsistent pretrial rulings on the proper scope of discovery, issues of causation, and other similar factual and legal issues present in each action.

WHEREFORE, for the reasons stated herein and in the accompanying Brief, Plaintiffs respectfully request that the Panel issue an order transferring all actions listed in the attached Schedule of Actions, as well as all subsequently filed related actions, for coordinated and consolidated pretrial proceedings to United States Northern District of California.

Dated: November 26, 2024

Respectfully submitted,

/s/ ***Ellen Relkin***
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