

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF FLORIDA  
PENSACOLA DIVISION

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

**Case No. 25-md-3140**

**Judge M. Casey Rodgers  
Magistrate Judge Hope T. Cannon**

**This Document Relates to:**  
*All Cases*

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**DEFENDANTS PFIZER INC., PHARMACIA & UPJOHN CO. LLC, AND PHARMACIA  
LLC'S NOTICE OF COMPLIANCE WITH CASE MANAGEMENT ORDER NO. 2**

Pursuant to Case Management Order No. 2, Defendants Pfizer Inc., Pharmacia & Upjohn Co. LLC, and Pharmacia LLC ("Pfizer") hereby certify that by the end of day today, May 12, 2025, they believe they will have completed document production on preemption and general causation (having produced more than one million separate documents comprising almost eight million pages). It is Pfizer's position that Plaintiffs now have more than sufficient documents from Pfizer's records to litigate the preemption and general causation issues. There are certain additional documents that Plaintiffs have requested and have not yet been produced, and that Pfizer has discussed with Plaintiffs, most notably additional email files from custodians who Plaintiffs and Pfizer identified in late April and early May. Those documents will be the subject of forthcoming supplemental rolling productions.

Date: May 12, 2025

Respectfully Submitted,

/s/ Joseph G. Petrosinelli

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Co. LLC, and Pharmacia LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2025, a copy of the foregoing document was served on counsel for all parties via CM/ECF.

Dated: May 12, 2025

/s/ Joseph G. Petrosinelli  
Joseph G. Petrosinelli