

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE: PARAGARD IUD	)	MDL DOCKET NO. 2974
PRODUCTS LIABILITY	)	
LITIGATION	)	(1:20-md-02974-LMM)
	)	This Document Relates to All Cases

PLAINTIFFS' NOTICE TO TAKE THE ORAL
DEPOSITION OF TED ANDERSON AND
REQUEST FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, Plaintiffs, by and through their counsel of record, will take the deposition by oral examination of Ted Anderson. The deposition will take place beginning at 9:30 a.m. Central Time on September 9, 2025, at Butler Snow LLP, 1320 Adams Street, Suite 1400, Nashville, TN 37208, before a notary public or other person authorized by law to administer oaths and take depositions, or at a mutually available time and location negotiated by the parties. The deposition, if not completed on the specified date, will continue on a mutually agreeable date from day-to-day, excluding Saturdays, Sundays and court-recognized holidays, until the examination is completed. The deposition will be recorded stenographically and by video recording. Plaintiffs reserve the right to use at the trial of this action the videotape recording of the deposition of the deponent pursuant to Fed. R. Civ. P.32(a).

Pursuant to Fed. R. Civ. P.34, the deponent is requested to produce within

thirty (30) days of service of this notice and, thereafter, supplement on or before the deposition date the following documents:

REQUEST FOR PRODUCTION

1. To the extent not already produced, all documents in Deponent's custodial file relating to Paragard, including both paper document and electronic document files that have not been produced to date. The scope of this request is intended to comport with all rulings of the Court pertaining to discovery and the custodial file protocol.
2. All documents, records, information or other material reviewed and/or requested by you in preparation for deposition.
3. All documents, records, information or other material, including but not limited to electronic data such as e-mails, shown to the deponent by Ulmer & Berne, Greenberg Taurig, P.A., Butler Snow LLP, or any other lawyer representing Defendants, including Defendants' employees or other agents, even if such documents are not in the deponent's possession, in preparation for this deposition, or other testimony worldwide relating to Paragard.
4. All documents the deponent creates (or are created on his/her behalf) in preparation for this deposition.
5. A copy of any and all prior testimony given by Deponent, including but not

limited to, deposition testimony, trial testimony, and/or FDA testimony.

6. A copy of any and all documents in Deponent's possession and control and/or available to him/her which in any way pertains to his/her training, job practices and procedures, duties, compensation and/or incentives with Defendant(s) as it pertains to Paragard.
7. Deponent's most current CV and/or resume.

Dated: 08/21/2025

s/Erin Copeland

Erin Copeland
TX Bar No. 24028157
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Plaintiffs' Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on 08/21/2025 Plaintiffs' Notice to Take the Deposition of Ted Anderson and Request for Production of Documents was served electronically on Defendants via their lead and liaison counsel.

Dated: 08/21/2025

/s/ Erin Copeland

Erin Copeland

Tx Bar No. 24028157

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