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

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

NINTH AMENDED NOTICE OF VIDEOTAPED FED. R. CIV. P. 30(b)(6) DEPOSITION OF THE CORPORATE REPRESENTATIVE FOR THE COOPER DEFENDANTS (*CONCERNING 2019 AND 2024 PARAGARD LABEL CHANGES*)

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30(b)(6), Plaintiffs, by and through the Plaintiffs' Leadership Committee, will take the deposition upon oral examination of the Cooper Defendants with respect to the topics set forth below. The deposition will take place at 10 AM EST on June 29, 2026 at Butler Snow LLP, 810 Seventh Avenue, Suite 1105 before a notary public or other person authorized by law to administer oaths and take depositions, or at a mutually available time negotiated by the parties. 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).

Plaintiffs reserve the right to seek relief from the court in the event Defendants

do not properly prepare the designated person(s) to testify on behalf of Defendants with respect to each of the identified topics.

Defendants are hereby requested and required under the federal rules to designate and produce at the deposition one or more officers, directors, managing agents, or other persons who consent to testify on their behalf on the following matters and documents:

DEFINITIONS

The term "2019 Paragard Label Changes" specifically refers to the label sections which are highlighted on **Exhibit A** to this deposition notice.

The term "2024 Paragard Label Changes" specifically refers to the label sections which are highlighted on **Exhibit B** to this deposition notice.

SCHEDULE A: DEPOSITION SUBJECT MATTERS

1. The **substance** of the 2019 Paragard Label Changes and 2024 Label Changes, including the rationale for each of the changes made. To the extent any label changes are being considered at the present, this notice also covers the substance and rationale for those changes.

2. All formal regulatory submissions and FDA communications concerning the 2019 Paragard Label Changes and 2024 Label Changes.

3. **All information** considered by you concerning the 2019 Paragard Label Changes. This includes, but is not limited to, any analyses, reports, clinical data, post-market surveillance, adverse event reports, customer / physician feedback,

marketing and/or sales considerations and/or studies reviewed, considered and/or relied upon as part of the decision making process for the label changes.

4. **Third-party involvement** in the 2019 Paragard Label Changes and 2024 Label Changes. This includes external consultants, vendors, advisory boards, and industry groups.

5. The extent to which you considered any **competitor IUD labels** as part of or factored into the 2019 Paragard Label Changes and/or the 2024 Label Changes and the rationale for doing so.

6. How the 2019 and 2024 Paragard Label Changes were incorporated into Paragard packaging and marketing / sales materials, including any training and/or communications provided to physicians, the public, sales representatives, and marketing employees or third parties as a result of the 2019 and 2024 Label Changes. This specifically includes the substance of what was approved to be communicated to physicians, the public, sales representatives, and marketing employees or third parties assisting in the communications about the 2019 and 2024 label changes and who approved the substance of those communications.

7. Any **post label change monitoring or surveillance** conducted by you or on your behalf for the 2019 Paragard Label Changes and 2024 Label Changes. This includes any studies and/or reviews specifically assessing the impact of the new label change language. This does not include Paragard's routine pharmacovigilance and quality assurance activities.

SCHEDULE B: DOCUMENTS TO BE PRODUCED

1. All documents which the deponent has utilized or may need to refresh his or her recollection as to any of the subject matters referenced in **Schedule A**.

2. All documents the deponent consults or relies upon in preparation for the deposition.

3. All documents the deponent creates (or are created on his/her behalf) to address any of the subject matters referenced in **Schedule A.**

4. The most current CV and/or resume for each of the person(s) being deposed pursuant to this notice.

Dated: June 22, 2026

s/Erin Copeland
Erin Copeland
TX Bar No. 24028157
FIBICH LEEBRON COPELAND & BRIGGS
1150 Bissonnet Street
Houston, TX 77005
Tel: (713) 751-0025
Fax: (713) 751-0030
Email: ecopeland@fibichlaw.com

MDL Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2026 Plaintiffs' Ninth Amended Notice of FRCP 30(b)(6) Deposition Concerning the 2019 and 2024 Label Changes and Request for Production of Documents was served electronically on Defendants via their lead and liaison counsel.

Dated: June 22, 2026

s/Erin Copeland
Erin Copeland
TX Bar No. 24028157
FIBICH LEEBRON COPELAND & BRIGGS
1150 Bissonnet Street
Houston, TX 77005
Tel: (713) 751-0025
Fax: (713) 751-0030
Email: ecopeland@fibichlaw.com

MDL Lead Counsel