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**

CASE MANAGEMENT ORDER NO. 14
(Case Management Order for Ongoing Litigation)

The Court has been informed that MDL Plaintiffs' Lead Counsel and, Defendants Pfizer Inc., Pharmacia LLC, and Pharmacia & Upjohn Co. LLC, have entered into a settlement (the "Settlement Program"), which the Court understands is memorialized in an agreement dated July 22, 2026, that will offer a substantial percentage of Plaintiffs with cases pending in this MDL the opportunity to resolve their claims.[1]

The Court understands that the deadline for claimants to register to participate in the Settlement Program is November 30, 2026, and that, thereafter, any potential claimants identified to and/or finally determined by the Settlement Administrator to be ineligible for the Settlement Program will be identified to the Court. The Court

[1] There is no admission of fault or liability by Defendants in connection with the settlement.

finds it appropriate to exercise its inherent authority and discretion to oversee these judicial proceedings by entering this Case Management Order to manage fairly, effectively, and efficiently the cases continuing in this MDL after the Settlement Program.

I. BACKGROUND AND THE BASIS OF THIS ORDER

1. ***MDL No. 3140.*** On February 7, 2025, the United States Judicial Panel on Multidistrict Litigation ("JPML") established MDL No. 3140 to centralize cases brought by "plaintiffs who allege they suffered intracranial meningiomas caused by use of Depo-Provera or a generic version thereof." ECF No. 1 at 2. Currently, 6,289 cases are pending in the MDL, brought by persons asserting personal injury claims related to depot medroxyprogesterone acetate products manufactured by Defendants, including Depo-Provera, Depo-SubQ Provera 104, and any authorized generic versions of such products (each, an "MPA Product").

2. ***Case Management Authority.*** District courts have inherent powers to manage their cases, particularly with respect to "massive litigation." *In re Asbestos Prods. Liab. Litig.* (No. VI), 718 F.3d 236, 243 (3d Cir. 2013) (quoting *In re Fannie Mae Sec. Litig*., 552 F.3d 814, 822-23 (D.C. Cir. 2009)); *see also Ramirez v. T&H Lemont, Inc*., 845 F.3d 772, 776 (7th Cir. 2016) ("a court has the inherent authority to manage judicial proceedings and to regulate the conduct of those appearing before

it"); *F.J. Hanshaw Enters., Inc. v. Emerald River Dev., Inc.*, 244 F.3d 1128, 1136 (9th Cir. 2001) ("All federal courts are vested with inherent powers enabling them to manage their cases and courtrooms effectively and to ensure obedience to their orders."). The district court's power extends, for example, to "controlling and scheduling discovery, including orders affecting disclosures and discovery under Rule 26 and Rules 29 through 37;" "adopting special procedures for managing potentially difficult or protracted actions that may involve complex issues, multiple parties, difficult legal questions, or unusual proof problems;" and "facilitating in other ways the just, speedy, and inexpensive disposition of the action." Fed. R. Civ. P. 16(c)(2)(F), (L) & (P).

3. ***Case Management in MDL Proceedings.*** The multidistrict litigation context "presents a special situation, in which the district judge must be given wide latitude with regard to case management in order to effectively achieve the goals set forth by the legislation that created the Judicial Panel on Multidistrict Litigation." *In re Avandia Mktg., Sales Pracs. & Prods. Liab. Litig.*, 687 F. App'x 210, 214 (3d Cir. 2017) (internal quotation omitted); *see In re Asbestos Prods. Liab. Litig.* (No. VI), 718 F.3d at 246 ("[A]dministering cases in multidistrict litigation is different from administering cases on a routine docket."). Case Management Orders that "streamline litigation in complex cases" have been "routinely used by courts to

manage mass tort cases." *In re Vioxx Prod. Liab. Litig*., 557 F. Supp. 2d 741, 743 (E.D. La. 2008). And appellate courts have regularly upheld their use in MDL cases. *See, e.g., United States v. Graf*, 610 F.3d 1148, 1169 (9th Cir. 2010) (citing *United States v. W.R. Grace*, 526 F.3d 499, 508-09 (9th Cir. 2008) (*en banc*)) ("A district court has broad authority to enter pretrial case management orders to ensure that the trial proceeds efficiently."); *Acuna v. Brown & Root, Inc*., 200 F.3d 335, 340 (5th Cir. 2000) (such "orders are designed to handle the complex issues and potential burdens on defendants and the court" and "are issued under the wide discretion afforded district judges over the management of discovery under Fed. R. Civ. P. 16").

4. ***The Exercise of Case Management Authority.*** An MDL judge bears the "enormous" task of "mov[ing] thousands of cases toward resolution on the merits while at the same time respecting their individuality." *In re Phenylpropanolamine (PPA) Prod. Liab. Litig*., 460 F.3d 1217, 1231 (9th Cir. 2006). To carry out this task in an organized and efficient manner, an MDL court must define and strictly adhere to case management rules. *See id.* at 1232 ("[T]he district judge must establish schedules with firm cutoff dates if the coordinated cases are to move in a diligent fashion toward resolution by motion, settlement, or trial."); *see also* Fed. R. Civ. P. 1 (stating that the Federal Rules of Civil Procedure "should be construed, administered, and employed by the court and the parties to secure the just, speedy,

and inexpensive determination of every action and proceeding"). In turn, counsel must collaborate with the Court "in fashioning workable programmatic procedures" and cooperate with those procedures thereafter. *In re PPA*, 460 F.3d at 1231-32. Pretrial orders—and the parties' compliance with those orders and their deadlines—"are the engine that drives disposition on the merits." *Id*. at 1232.

5. ***Compliance with Deadlines.*** The Court's "wide latitude" in managing complex litigation includes not only the discretion to establish discovery orders but also to dismiss cases for non-compliance with those orders. *In re Avandia Mktg., Sales Pracs. & Prods. Liab. Litig*., 687 F. App'x at 214-15 (affirming MDL court's dismissal for failure to comply with an order requiring that future plaintiffs provide an expert report); *see also Dzik v. Bayer Corp*., 846 F.3d 211, 216 (7th Cir. 2017) (affirming MDL court's dismissal for failure to comply with discovery order and noting, "[d]istrict courts handling complex, multidistrict litigation 'must be given wide latitude with regard to case management' in order to achieve efficiency") (internal quotations omitted); *In re PPA*, 460 F.3d at 1232 (finding no abuse of discretion in MDL court's dismissal of claims for failure to comply with discovery and product identification case management orders). "A [court's] willingness to resort to sanctions in the event of noncompliance can ensure that the engine remains in tune, resulting in better administration of the vehicle of multidistrict litigation."

In re Cook Med., Inc. Pelvic Repair Sys. Prof. Liab. Litig., MDL 2440, Case No. 2:16cv3043, 2018 WL 4698953, at *2 (S.D. W.Va. Sept. 28, 2018) (citing *Freeman v. Wyeth*, 764 F.3d 806, 810 (8th Cir. 2014) ("The MDL judge must be given 'greater discretion' to create and enforce deadlines in order to administrate the litigation effectively. This necessarily includes the power to dismiss cases where litigants do not follow the court's orders.")).

6. ***Post-Settlement Litigation.*** The broad discretion afforded to the district court also enables it to enter rigorous case management orders after substantial discovery has taken place in a mature mass tort or multidistrict litigation when a defendant has taken steps to settle a significant portion of the claims pending against it. *Avila v. Willits Envtl. Remediation Tr.*, 633 F.3d 828, 833 (9th Cir. 2011) (noting such orders are authorized by district judge's "broad discretion to manage discovery and to control the course of litigation under Federal Rule of Civil Procedure 16"). This Court exercised discretion and inherent authority to enter such a post-settlement case management order in 3M, the largest MDL proceeding to date, establishing certain discovery and other requirements for future cases filed against settling defendants in tort litigation. *See In re: 3M Combat Arms Earplug Prods. Liab. Litig*., MDL No. 2885, Case No. 3:19md2885-MCR/HTC, ECF No. 3811, 2023 WL 8609280, Case Management Order No. 57 (N.D. Fla. Aug. 29, 2023).

Other MDL courts have done the same under similar circumstances. *See, e.g., In re American Med. Sys., Inc. Pelvic Repair Sys. Prods. Liab. Litig.*, MDL No. 2325, Case No. 2:12md2325, Pretrial Order # 239, ECF No. 4272 (S.D. W.Va. June 7, 2017) (establishing requirements for future claims against a defendant due to "recent settlement developments" of thousands of claims after more than three years of litigation); *In re Zostavax (Zoster Vaccine Live) Prods. Liab. Litig.*, No. CV 18-MD-2848, 2022 WL 952179, at *2-3 (E.D. Pa. Mar. 30, 2022) ("A Lone Pine management order is the only viable way that 'will promote the just and efficient conduct of [these] actions'" after three years of discovery and plaintiffs' experts' causation opinions "fall[ing] short in all bellwether cases") (quoting 28 U.S.C. § 1407(a)); *In re Testosterone Replacement Therapy Prods. Liab. Litig.*, MDL No. 2545, Case No. 1:14-cv-01748, Case Management Order No. 126, ECF No. 2716 at 1-2 (N.D. Ill. June 11, 2018) (finding it appropriate to enter an order to manage remaining litigation in light of the parties' settlement agreements entered after over four years of litigation).

7. ***Procedures Deployed in this MDL.*** This MDL is in its second year, and extensive discovery and motions practice has proceeded on an accelerated schedule. During this time, substantial energy and resources have been expended by the Parties and the Court. The Court has exercised its discretion and inherent

authority to establish discovery and related procedures for the various phases of the litigation. *See* Fed. R. Civ. P. 1; Fed. R. Civ. P. 16(c). For example, to advance the efficient management of the litigation, the Parties and the Court collaboratively developed a threshold process that required all Plaintiffs to obtain and produce "(a) initial documentary proof of use for each named Defendant's product, and (b) initial documentary proof of their alleged meningioma injury," *see, e.g.*, ECF No. 178 (PTO 17), and outlined related deficiency processes, *see, e.g.*, ECF No. 281 (PTO 22), with which the Parties, assisted by BrownGreer, have complied. As a result, lead counsel for both sides, within a relatively short period, have obtained a substantially developed understanding of key characteristics of the cases in the MDL.

8. ***Progress in this MDL.*** The Parties and the Court also collaboratively developed a robust framework for the effective and efficient management of the litigation, which involved setting a schedule that prioritized discovery on, and briefing of, two threshold issues: federal preemption and general causation. Consistent with that schedule, extensive fact and expert discovery has occurred. Defendants have produced more than ten million pages of corporate discovery, Plaintiffs' Leadership have deposed five fact witnesses, the Parties have exchanged fulsome expert reports on the prioritized issues, with each side offering lengthy

general causation reports from five experts, and subsequently the Parties have deposed one another's experts. The Court has also received omnibus briefing on the significant threshold legal issues of federal preemption and general causation—the first of which has been argued and is awaiting decision. And the Parties' efforts have extended beyond preemption and general causation. Indeed, the Parties have proceeded to exchange additional liability-related document discovery, the production of which was complete as of June 15, 2026. ECF No. 662. Subject to the Court's orders on confidentiality and treatment of common benefit work product, all of this material is available through Plaintiffs' Lead Counsel to all Plaintiffs in the MDL whose counsel has signed a participation agreement consistent with the Court's Common Benefit Orders.

9. ***Current Status.*** As a result of this substantial amount of discovery, briefing, and other case development, the Parties have an understanding of the strengths and weaknesses of their respective claims and defenses. Accordingly, the Court set an initial bellwether trial in the MDL for December 7, 2026, subject to decisions on Defendants' preemption and Rule 702 motions.

10. ***The Purpose of this Order.*** Consistent with its broad discretion and inherent authority to manage the "complex issues, multiple parties, difficult legal questions, [and] unusual proof problems" involved in a litigation of this magnitude

and cost, the Court finds it necessary and appropriate to enter this Case Management Order governing the discovery obligations of Plaintiffs who continue in litigation after the Settlement Program. *See Adinolfe v. United Tech. Corp.*, 768 F.3d 1161, 1167 (11th Cir. 2014) (quoting Fed. R. Civ. P. 16(c)(2)(L)). Given the stage of this litigation, and the volume of data available to all stakeholders (including Litigating Plaintiffs), the Court finds it reasonable and imperative to require Litigating Plaintiffs to come forward and fulfill the discovery obligations set forth in this Case Management Order before both sides begin incurring the substantial costs involved with preparing a Litigating Plaintiff's MPA Product claim for trial.

For the foregoing reasons, it is **ORDERED** as follows:

II. PLAINTIFF GROUPS USED IN THIS ORDER

11. ***Litigating Plaintiffs.*** This Order directs the production of certain claims information and sets deadlines to meet requirements relating to product use, alleged injury, causation, time-based defenses, and related dispositive motion practice, prior to any further supplemental discovery, for "Litigating Plaintiffs." Litigating Plaintiffs are those Plaintiffs who are (a) Non-Settling Plaintiffs; (b) Ineligible Plaintiffs who are not Limitations Plaintiffs or Latency Plaintiffs; and (c) Future Filed Plaintiffs. All Litigating Plaintiffs, including Plaintiffs who represent

themselves *pro se*, are bound by the requirements of this Order and must fully comply with all obligations required by this Order, unless otherwise stated.

12. ***Non-Settling Plaintiffs.*** "Non-Settling Plaintiffs" are Plaintiffs who have actions pending in the MDL as of the date of this Order and who are eligible to participate in the Settlement Program but who do not participate in the Settlement Program. BrownGreer—as the Settlement Administrator of the Settlement Program (the "Settlement Administrator") — will inform the Court of the date on which any Plaintiff eligible to participate in the Settlement Program became a Non-Settling Plaintiff.

13. ***Ineligible Plaintiffs.*** "Ineligible Plaintiffs" are Plaintiffs who have actions pending in the MDL as of the date of this Order and who are not eligible or permitted to participate in the Settlement Program, but who are not Limitations Plaintiffs or Latency Plaintiffs. The Settlement Administrator will inform the Court which Plaintiffs are Ineligible Plaintiffs after that determination is made.

14. ***Future Filed Plaintiffs.*** "Future Filed Plaintiffs" are Plaintiffs whose cases are filed in, refiled in, removed to, or transferred into this Court after the date of this Order, excluding those individuals who file complaints on the Court's administrative docket solely for the purpose of participating in the Settlement Program. The administrative docket will be established through a separate Order.

The only Plaintiffs permitted to file complaints on the administrative docket are those who (a) signed engagement letters with counsel to pursue their MPA Product claim on or before June 11, 2026, and (b) are eligible to participate in the Settlement Program. The Settlement Administrator will inform the Court promptly if it determines that any Plaintiff who filed on the administrative docket does not meet these criteria, after which that Plaintiff's complaint will be transferred to the active docket.

15. ***Limitations Plaintiffs***. "Limitations Plaintiffs" are Plaintiffs who are not eligible to participate in the Settlement Program because of the date on which they commenced their action against Defendants.

16. ***Latency Plaintiffs.*** "Latency Plaintiffs" are Plaintiffs who are not eligible to participate in the Settlement Program because of the timing of the individual's meningioma diagnosis relative to their last use of an MPA Product.

III. STAY OF PROCEEDINGS INVOLVING THE PARTIES

17. ***Scope of Stay.*** Because the focus of all Parties' efforts now should be on the implementation of the Settlement Program, which will take significant time and effort, the Court hereby **STAYS** all proceedings in the MDL *except* for (a) the obligations and proceedings imposed in this Order, (b) the proceedings in the three Pilot Cases as set forth in ECF No. 703, (c) as to Limitations Plaintiffs and Latency

Plaintiffs, the obligations set forth in Pretrial Orders 17, 22, 22A, and 23 relating to threshold proof of use and injury and complaints, and (d) any other obligations or proceedings established by future order of the Court. This stay is in effect until lifted by order of the Court.

IV. PRESERVATION NOTICES REQUIREMENTS

18. ***Preservation Notice.*** Counsel for any Litigating Plaintiff or a *pro se* Litigating Plaintiff must notify the following individuals or entities, in hard copy by certified mail (or such other method that provides proof of receipt), that they may have records relevant to the Litigating Plaintiff's claim in this MDL and that any records relating to the Litigating Plaintiff must be preserved, pending collection by the Litigating Plaintiff (a "Preservation Notice"):

(a) All physicians and/or other healthcare providers who, for any reason, treated the Litigating Plaintiff or prescribed an MPA Product to the Litigating Plaintiff;

(b) If a Litigating Plaintiff is seeking lost wages, all of her employers for the period from three years prior to the date for which she is seeking lost wages through the last day for which Litigating Plaintiff is seeking lost wages;

(c) If a Litigating Plaintiff is seeking lost wages, all of her tax preparers or advisors, if any, for the period from three years prior to the date for which she is seeking lost wages through the last day for which Litigating Plaintiff is seeking lost wages.

19. ***Maintenance of Copies.*** Counsel for the Litigating Plaintiff and each *pro se* Litigating Plaintiff must maintain copies of all Preservation Notices for so long as the Plaintiff's case remains pending in this MDL.

20. ***Deadlines for Issuance of Preservation Notices.*** The deadlines for Litigating Plaintiffs to send their Preservation Notices are as follows:

(a) Non-Settling Plaintiffs: Within 60 days after the Plaintiff becomes a Non-Settling Plaintiff.

(b) Ineligible Plaintiffs: Within 60 days after the Settlement Administrator determines that the Plaintiff is an Ineligible Plaintiff.

(c) Future Filed Plaintiffs: Within 60 days after the date a Future Filed Plaintiff files her case in the MDL or her case is transferred to this Court by the JPML.

21. ***Statement of Compliance.*** No later than the deadline for issuance of Preservation Notices applicable to the Litigating Plaintiff under Paragraph 20 of this Order, Counsel for the Litigating Plaintiff and a *pro se* Litigating Plaintiff also must

serve upon Counsel for Defendants through MDL Centrality a statement listing the names and addresses of all individuals or entities to which Preservation Notices were sent, along with copies of the Preservation Notices and a signed certification that the Preservation Notices were sent as required by this Order.

22. ***Proceedings to Ensure Compliance.*** Counsel for Litigating Plaintiffs and any *pro se* Litigating Plaintiffs who fail to comply fully with the requirements of this Order regarding Preservation Notices will be given notice through MDL Centrality of the deficiency, with a copy of such notice to the Court through MDL Centrality. The Court will issue an order to those Litigating Plaintiffs requiring that the deficiency be cured within 30 days (the "Preservation Notice Cure Period"). The Preservation Notice Cure Period will be available only to a Litigating Plaintiff who has taken actions to comply timely with the requirements of this Order regarding Preservation Notices and will not function as an automatic extension of the deadline for doing so. The Settlement Administrator will advise the Court of any Litigating Plaintiff who failed to cure following expiration of the Preservation Notice Cure Period. The Court then will enter a Show Cause Order as to those Litigating Plaintiffs and, if the deficiency is not cured in response to that Order, the cases of such Litigating Plaintiffs will be dismissed with prejudice, in light of the considerations outlined in Section I of this Order. **Counsel for Litigating Plaintiffs**

and Litigating Plaintiffs themselves are hereby on notice that the Court expects full compliance with any notice provided by the Settlement Administrator, as the Settlement Administrator has been delegated authority from the Court to process deficiencies in this manner.

23. ***Consequences of Failure to Send Preservation Notice.*** Litigating Plaintiffs may not seek to introduce into evidence at trial any document or information from the Litigating Plaintiff's physician, other healthcare provider, employer, or tax preparer if a Preservation Notice was not sent to such physician, other healthcare provider, employer, or tax preparer as required by this Order. A Litigating Plaintiff who fails to comply with this Order may also be subject to other sanctions or orders.

V. RESPONSIVE PLEADINGS

24. ***Response by Defendants.*** Defendants must respond to any Litigating Plaintiff's complaint as follows, absent an agreed extension and leave of Court:[2]

[2] Defendants are not required to respond to any complaint filed on the administrative docket referenced in paragraph 14 above. If such a complaint is transferred to the active docket, Defendants are required to respond to the complaint, absent an agreed extension, within 21 days after transfer to the active docket, consistent with Federal Rule of Civil Procedure 12(a).

(a) Non-Settling Plaintiffs: Within 21 days after the date on which the Plaintiff becomes a Non-Settling Administrator advises Defendants that the Plaintiff failed to participate;

(b) Ineligible Plaintiffs: Within 21 days after the Settlement Administrator determines that the Plaintiff is an Ineligible Plaintiff; and

(c) Future Filed Plaintiffs: Within 21 days after docketing in the MDL, consistent with Federal Rule of Civil Procedure 12(a).

VI. REQUIRED PRODUCTION BY LITIGATING PLAINTIFFS

25. ***Mandatory Disclosures and Productions.*** All Litigating Plaintiffs must serve the following documents and/or information on Counsel for Defendants through MDL Centrality, to the extent not already provided. The production of each required category of documents and/or information must be made separately on a category-by-category basis using the correct document description for each category:

(a) Initial Disclosures: All disclosures required by Fed. R. Civ. P. 26(a)(1).

(b) Plaintiff Fact Sheet: A completed Fact Sheet in the form attached to this Order as Exhibit 1, signed in person or electronically by the Litigating Plaintiff under penalty of perjury. Admissions regarding matters contained in verified Fact Sheets will be treated as conclusively

established unless the Court, on motion, permits the admission to be withdrawn or amended.

(c) Proof of Use Requirements: (1) All available documentation establishing that the Litigating Plaintiff used an MPA Product; and (2) a declaration setting forth the first date when the Litigating Plaintiff used an MPA Product, the last date when the Litigating Plaintiff used an MPA Product, and the intervening date ranges when the Litigating Plaintiff used an MPA Product.

(d) Proof of Injury Requirements: All available documentation concerning the Litigating Plaintiff's meningioma diagnosis, Litigating Plaintiffs' course of treatment for meningioma (including any radiation or surgery), and any ongoing or permanent injuries alleged by Litigating Plaintiffs to be related to MPA Product use.

(e) Medical Records: All medical records relating to the Litigating Plaintiff from any time before, during, and after the Litigating Plaintiff's meningioma diagnosis relating to the diagnosis or treatment of Plaintiff's meningioma.

(f) Documents Relating to Injuries: All documents relating to the Litigating Plaintiff's alleged meningioma including but not limited to

messages, emails, or other communications discussing the cause, extent, or impact of any alleged meningioma and any related complaint, problem, or condition.

(g) Non-Privileged Communications Relating to Litigation: All nonprivileged communications relating to this litigation.

26. ***Records Collection and Production.*** Each Litigating Plaintiff and her Counsel must affirmatively collect and produce records from all available sources in the Litigating Plaintiff's possession, custody, or control, including but not limited to any relevant records that can be collected from the Litigating Plaintiff's medical facilities and health care providers that treated the Litigating Plaintiff at any time. Counsel for the Litigating Plaintiff and a *pro se* Litigating Plaintiff is responsible for submitting necessary authorizations or other requests required to obtain the Litigating Plaintiff's medical records, personnel files, and other documents required by this Order. Producing authorizations to the Defendants to allow the Defendant to collect these records is not sufficient to comply with this Order.

27. ***Affidavit Regarding Production.*** Litigating Plaintiffs must serve upon Counsel for Defendants through MDL Centrality an affidavit signed by Litigating Plaintiff's Counsel (or, for *pro se* Litigating Plaintiffs, by Plaintiff) attesting that: (a) the Litigating Plaintiff has provided a Fact Sheet, executed under penalty of perjury;

(b) all available records described in this Section VI have been collected; (c) all records collected have been produced pursuant to this Order; and, except in the case of a *pro se* Litigating Plaintiff, (d) Counsel has met with the Litigating Plaintiff, personally investigated the merit of Litigating Plaintiff's claim, satisfied themselves that the claim is meritorious, and discussed with the Litigating Plaintiff the claim and likelihood of success. If any of the documents or records described in this Section VI do not exist or exist but cannot be obtained, the affidavit must state that fact and the reasons why such materials do not exist or cannot be obtained and must provide a "No Records Statement" from each records custodian or proof of return to sender from the United States Postal Service if the last known address of the medical provider is no longer valid. Litigating Plaintiffs who have already uploaded records as part of the PTO 17 and PTO 22 process may reference those in their affidavit, though the Court notes that the categories of documents called for by this Order are broader than those at the threshold proof stage and that Litigating Plaintiffs must request and produce all of the relevant documents, not the excerpts permitted by PTO 17 and PTO 22.

28. ***Identification of Choice of Law.*** Litigating Plaintiffs must affirmatively identify the choice of law the Litigating Plaintiff asserts should apply to her claim and an explanation for the choice based on the Litigating Plaintiff's

alleged MPA Product use. Plaintiff's Choice of Law must be filed on the individual case docket. Counsel or *pro se* Litigating Plaintiff then must download a copy of the Identification of Choice of Law from PACER showing a PACER timestamp and serve that Identification of Choice of Law on Counsel for the Defendants through MDL Centrality.

29. ***Litigating Plaintiffs' Expert Reports.*** All Litigating Plaintiffs must serve on Counsel for Defendants through MDL Centrality expert reports in compliance with Federal Rule of Civil Procedure 26(a)(2) as follows:

(a) For all Litigating Plaintiffs alleging a meningioma, a Rule 26(a)(2) expert report including, but not limited to:

(1) an opinion that such Litigating Plaintiff had or has a meningioma caused by MPA Product use;

(2) an opinion ruling out alternative causes for the Litigating Plaintiff's meningioma;

(3) an as-precise-as-possible identification of all MPA Product use by the Litigating Plaintiff, and the nature and timing of the Litigating Plaintiff's alleged injury, along with the details of any medical exams, testing, diagnosis or treatment relied upon to support any claimed injury;

(4) a sworn statement that the expert believes that the Litigating Plaintiff's use of an MPA Product caused the Litigating Plaintiff's alleged injury, along with a detailed description of all facts, medical and scientific literature or other authorities relied upon by the expert to support such opinion; and

(5) a complete set of medical records relied upon in forming the expert's opinion.

(b) A Rule 26(a)(2) expert report describing all of the Litigating Plaintiff's alleged damages, including a complete set of records relied upon in forming the expert's opinion.

30. ***Further Proceedings.*** Form or template reports not in compliance with this Order are not permitted and will be stricken by the Court. If a Litigating Plaintiff provides Rule 26 expert reports as contemplated by Paragraph 29 of this Order, the Court expects to set further deadlines for management of the case, including deadlines for additional discovery and dispositive motion practice regarding the Litigating Plaintiff's claims.

31. ***Deadlines for Required Production.*** The deadlines for Litigating Plaintiffs to take the actions required by Paragraphs 25 through 30 of this Order are as follows:

(a) Non-Settling Plaintiffs: Within 90 days after the Plaintiff becomes a Non-Settling Plaintiff.

(b) Ineligible Plaintiffs: Within 90 days after the Settlement Administrator determines the Plaintiff is an Ineligible Plaintiff.

(c) Future Filed Plaintiffs: Within 90 days after the date a Future Filed Plaintiff files her case in the MDL or her case is transferred to this Court by the JPML.

32. ***Consequences of Non-Compliance With Production Requirements.*** The Court has established the foregoing production requirements and deadlines for the purpose of ensuring that further pretrial litigation against the Defendants will progress as smoothly and efficiently as possible. Accordingly, the Court expects strict adherence to the deadlines. Counsel for Litigating Plaintiffs and *pro se* Litigating Plaintiffs who fail fully and timely to comply with the requirements in Paragraphs 25 through 31 of this Order will be given notice of any deficiencies through MDL Centrality, with a copy of such notice provided to the Court through and MDL Centrality. The Court will issue an order to those Litigating Plaintiffs requiring that the deficiency be cured within 30 days (the "Production Cure Period"). The Production Cure Period will be available only to a Litigating Plaintiff who has taken actions to comply timely with the production requirements of this Order and

will not function as an automatic extension of the deadline for doing so. The Court will be notified by the Settlement Administrator of any Litigating Plaintiff who failed to cure following expiration of the Production Cure Period. The Court then will enter a Show Cause Order for those Plaintiffs and, if the deficiency is not cured, the cases of such Plaintiffs will be dismissed with prejudice, in light of the considerations outlined in Section I above. **Counsel for Litigating Plaintiffs and Litigating Plaintiffs themselves are hereby on notice that the Court expects full compliance with the notice provided by the Settlement Administrator, as the Settlement Administrator has been delegated authority from the Court to process deficiencies in this manner.**

VII. MEDIATION

33. ***Mandatory Mediation.*** All Litigating Plaintiffs who have fulfilled the requirements set forth in this Order must participate in mediation before Magistrate Judge Hope Cannon. Mediation must commence within 90 days after the date that the Litigating Plaintiff's production and expert requirements have been fulfilled and must continue for at least 90 days following the date on which it commences. All discovery not otherwise required by this Order is stayed until after the requirements outlined in this Section have been completed.

VIII. STATUS CONFERENCE

34. ***Mandatory Status Conference.*** All Litigating Plaintiffs and their Counsel are expected to meet with the Court in person at the courthouse for the United States District Court for the Northern District of Florida in Pensacola, Florida, to review the potential risks and benefits of proceeding as a Litigating Plaintiff, the obligations for continued litigation and, if eligible, the benefits of participating in the Settlement Program. A Plaintiff's unexcused failure to appear at a scheduled Status Conference will result in Plaintiff's case being dismissed with prejudice. The scheduling of a Litigating Plaintiff's Status Conference will be addressed by separate Order.

35. ***Mandatory Attestation.*** Prior to the status conference with the Court, the Litigating Plaintiff must serve on Counsel for the Defendants through MDL Centrality an attestation of Counsel (or of the individual *pro se* Litigating Plaintiff) that they have performed all obligations of Litigating Plaintiffs set forth in this Order required by such time.

IX. CERTIFICATION AND DISCOVERY OBLIGATIONS OF FUTURE FILED PLAINTIFFS

36. ***Certification.*** Counsel for each Future Filed Plaintiff and each *pro se* Future Filed Plaintiff who alleges they developed a meningioma from an MPA Product prior to March 27, 2024, must, within 30 days after filing in or transfer to

this MDL, serve on Counsel for Defendants through MDL Centrality and file with the Court a Certification that provides the basis for the Future Filed Plaintiff's assertions that her claims are not barred by the applicable statute of limitations. To be clear, potential plaintiffs who file complaints solely for the purpose of participating in the Settlement Program are not required to comply with this provision.

37. ***Discovery.*** All Future Filed Plaintiffs also must, by the deadlines set by Paragraph 31 of this Order, serve on Counsel for Defendants an affidavit signed by the Plaintiff providing the following information: (a) the date the Plaintiff first learned her meningioma may be related to the use of an MPA Product; and (b) how the Plaintiff first learned her meningioma may be related to the use of an MPA Product.

X. DISCOVERY AND RELATED DISPOSITIVE MOTION PRACTICE FOR ALL LITIGATING PLAINTIFFS

38. ***Proposed Scheduling Order.*** If the mediation as set forth in Section VII is unsuccessful and the Litigating Plaintiff has complied with the requirements of this Order, then the Parties may submit to the Court, as applicable, a proposed Scheduling Order that: (a) grants the Parties 180 days from the entry of the Scheduling Order to conduct discovery on case-specific and, as permitted by the Court, other issues ("Additional Discovery"); and (b) sets a briefing schedule that

allows the Parties 45 days after the close of Additional Discovery for the Parties to submit summary judgment motions and Rule 702 motions, 28 days for responses, and 28 days for replies.

39. ***Additional Discovery.*** During such Additional Discovery, the Parties are permitted to: (a) take the depositions of the Plaintiff, the Plaintiff's spouse, if applicable, and any other non-party lay fact witness specific to the Plaintiff for up to seven hours each; (b) take the depositions of no more than three of the Plaintiff's treating healthcare providers for up to seven hours each; and (c) conduct such other depositions permitted by the Court on a showing of good cause.

40. ***Case Management Conference.*** Based on the outcome of any summary judgment motions, if appropriate, the Court will set a Case Management Conference to determine whether any non-duplicative discovery, including additional expert disclosures, are necessary and to discuss other case management issues. However, the witnesses specific to the Plaintiff's claims already deposed may not be re-deposed absent showing of good cause. The filing and briefing of summary judgment motions and Rule 702 motions after the Additional Discovery ordered above will not prejudice or otherwise foreclose the opportunity for any Party to file later, non-duplicative summary judgment and Rule 702 motions after completing full fact and expert discovery. The Court's use of the term "non-

duplicative" is intended to express the Court's intention not to permit later summary judgment motions concerning topics addressed in summary judgment motions filed at the conclusion of the Additional Discovery period or Rule 702 motions concerning witnesses addressed in Rule 702 motions filed at the conclusion of the Additional Discovery period.

41. ***Dispositive Motions.*** The foregoing provisions do not preclude any Party from filing non-duplicative dispositive motions.

XI. FRAUD AND DECEPTION

42. ***Penalties for Fraud and Deception.*** Any Party and/or Counsel for a Party who submits false or misleading information or otherwise attempts to satisfy the documentation requirements of this Order through deception, dishonesty, or fraud, will be subject to appropriate sanctions, including but not limited to monetary sanctions and costs, and dismissal with prejudice pursuant to Federal Rule of Civil Procedure 37. Plaintiffs who fail to fully comply with the requirements of this Order may be subject to sanctions and dismissal of their claims pursuant to Federal Rule of Civil Procedure.

XII. LIMITATIONS PLAINTIFFS AND LATENCY PLAINTIFFS

43. ***Further Proceedings.*** The Court anticipates scheduling further proceedings for those Plaintiffs who are ineligible for the Settlement Program

because they are either a Limitations Plaintiff or a Latency Plaintiff, as defined above, to address resolution of cross-cutting defenses applicable to their claims, which may include consolidated briefing on such defenses and such other obligations and procedures applicable to Limitations Plaintiffs and Latency Plaintiffs as the Court deems appropriate at that time. *See* ECF No. 703.

XIII. SCHEDULING OF FUTURE MATTERS

44. ***Current Focus.*** The Settlement Program will require significant long-term implementation efforts by Counsel, Plaintiffs, Defendants, and the Court. It is the intent of the Court to support those Settlement Program implementation efforts and, consistent with this Order, to defer consideration of further proceedings while those efforts and the Settlement are ongoing. To assist Counsel and Plaintiffs in their understanding of and compliance with this Order, Exhibit 2 provides a summary of its definitions and deadlines.

SO ORDERED this 10th day of August, 2026.

M. Casey Rodgers

M. CASEY RODGERS
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

IN RE: DEPO-PROVERA (DEPOT MEDROXYPROGESTERONE ACETATE) PRODUCTS LIABILITY LITIGATION	**Case No. 3:25-md-3140**
This Document Relates to: All Cases	**Judge M. Casey Rodgers** **Magistrate Judge Hope T. Cannon**

PLAINTIFF FACT SHEET

This Fact Sheet is to be completed by each Plaintiff in this litigation (hereafter referred to as "you" or "Plaintiff") as required by Case Management Order No. 14 (Case Management Order For Ongoing Litigation Against Defendants) in connection with *In re Depo-Provera (Depot Medroxyprogesterone Acetate) Products Liability Litigation* (MDL 3140).

In completing this Fact Sheet, you are under oath and must answer every question and provide information that is true and correct to the best of your knowledge after a reasonable investigation. You are required to provide as much information as you can in response to each question. You are also required to conduct a reasonable inquiry, to the extent necessary, to obtain or confirm the information you provide in this Fact Sheet. Likewise, if any information you need to complete any part of the Fact Sheet is in the possession of your attorney, please consult with your attorney so that you can fully and accurately respond to the questions set out below. If you are completing the Fact Sheet for someone who cannot complete the Fact sheet himself or herself, please answer as completely as you can.

All responses must be made without objection and to the best of your knowledge and recollection. Use additional sheets if necessary to answer any question completely. If additional sheets are used to provide further answers to any question, you should indicate on the form that additional pages will be used and should include those pages in the verification of the Plaintiff Fact Sheet.

A completed Fact Sheet will be considered interrogatory answers pursuant to the Federal Rules of Civil Procedure Rule 33 and answers to Requests for

Admission pursuant to Federal Rule of Civil Procedure Rule 36. As such, admissions regarding matters contained in this verified Plaintiff Fact Sheet will be treated as conclusively established party admissions unless supplemented by Plaintiff in an amended Plaintiff Fact Sheet verified by the Plaintiff or the Court, on motion, permits the admission to be withdrawn or amended. You must promptly supplement your responses if you learn that they are incomplete or incorrect in any material respect.

Pursuant to the Court's CMO No. 14, each plaintiff must complete and submit this Plaintiff Fact Sheet by the deadlines set forth in Section VI of the Order. All Plaintiff Fact Sheets and Verification pages must be served on the defendants via each plaintiff's individual MDL Centrality portal with the correct MDL Centrality document description provided for each document. Consistent with CMO No. 14, a failure to provide a complete and verified Plaintiff Fact Sheet by the necessary deadlines may result in dismissal with prejudice.

I. CASE INFORMATION

1. Current MDL Centrality Plaintiff ID Number: _____

    a. Prior MDL Centrality Plaintiff ID Numbers, if any: _____

2. Current MDL Case Number: _____

3. Date Current MDL Case Filed: _____

4. Current Law Firm: _____

5. All law firms who have represented You in connection with Your depot medroxyprogesterone acetate (DMPA) Claim(s):

Law Firm	Start Date of Representation	End Date of Representation

6. Prior Case Numbers (if any):

Case Number	Court/Venue	Status	Date of Dismissal (if any)

7. When did you first become aware of litigation/lawsuits relating to Depo-Provera or DMPA?

    Month: _____ Year: _____

8. Describe how you first learned of the litigation: _____

    _____

9. When did you first attempt to contact a lawyer about Your potential claim relating to Depo-Provera use? (MM/YYYY): _____

II. PLAINTIFF INFORMATION

Please provide the following information for the individual on whose behalf the action was filed.

1. Name (First, Middle, and Last):_____

2. Maiden name or other names used by You, or by which You have known and the dates those names were used:

Previous Name	Years Used	Reason for change

3. Social Security Number: _____

4. Date of Birth (MM/DD/YYYY): _____

5. Biological Sex at Birth: ☐ Female ☐ Male

6. Current Residence (full address):

   Number and Street: _____

   City: _____ State: _____ Zip Code: _____

7. Number of Years at Current Residence: _____

8. List Your residential addresses in the year(s) You used DMPA:

Number and Street	City, State, ZIP	Years There

If you are completing this questionnaire in a representative capacity (e.g., on behalf of the estate of a deceased person), please state the following:

9. Name (First, Middle, and Last):_____

10. Current Residence (full address):

    Number and Street: _____

    City: _____ State: _____ Zip Code: _____

11. Capacity in which you are representing the individual: _____

12. If you were appointed as a representative by a court, identify the state, court and case number:

    _____

13. Relationship to the represented person: _____

14. Date of death of the decedent: _____

15. Place of death of the decedent (city, state, country):

    _____

16. Was an autopsy performed? ☐ Yes ☐ No

    If yes, provide the name and address of the facility where the autopsy was performed and attach a copy of the autopsy report: _____

17. List all social media profiles (including MySpace, Facebook, Twitter/X, LinkedIn, TikTok, Instagram, Yelp or any others) and associated account name or user names You have ever used:

Social Media Platform (Facebook, Instagram, etc.)	Account or username or handle

18. Describe the highest level of education You have attained:

    _____

19. List all employment experience starting five years prior to Your first use of DMPA through the present:

Occupation	Employer Name and Address	Dates of Employment

20. Have you ever served in the military? ☐ Yes ☐ No

If yes, please provide dates and military branch: _____

_____

21. Have You ever been rejected from employment or military service related to health or disability reasons? ☐ Yes ☐ No

22. Have You ever filed a worker's compensation claim, social security claim, or lawsuit (including any bankruptcy or divorce proceedings)? ☐ Yes ☐ No

If yes , identify the parties, case number, jurisdiction, date initiated, subject matter/allegations, and disposition, to the extent known:

Year	Where Filed	Subject Matter	Status/Disposition

III. FAMILY

1. Current marital status:

☐ Married ☐ Unmarried – Living with Partner

☐ Unmarried – Not Living with Partner ☐ Single

2. If married, please provide the following information for Your spouse:

   Name: _____

   Current Age: _____

   Year of Marriage (YYYY): _____

   If married, is Your spouse asserting a Loss of Consortium claim: ☐ Yes ☐ No

3. Have you previously been married? ☐ Yes ☐ No

   If yes, please provide the following information about Your former spouse(s):

Full Name	Year of Marriage	Year of Divorce

4. Do you have any children? ☐ Yes ☐ No

   If you have any children, please provide the following information regarding each child:

Full Name	Year Born (YYYY)	Does the child live with You?

5. List all of the people who currently live with You at Your residence, along with their relationship to You who are not already listed in response to III.2, III.3, or III.4:

Full Name	Age	Relationship to You	How long has the person lived with You?

IV. PRODUCT USE

1. List Your FIRST use of DMPA (MM/YYYY): _____

2. List Your LAST use of DMPA (MM/YYYY): _____

3. For what reason(s) were You prescribed DMPA?

☐ Contraception ☐ Endometriosis

☐ Excessive bleeding ☐ Other (please describe):

4. Please provide the below additional information about Your DMPA use:

DMPA or medroxyprogesterone product used[1]	Start Date (MM/YYYY)	Stop Date (MM/YYYY)	Medical Facility	Medical Facility Address	If online or home delivery pharmacy, provide Member ID

[1] Options are: Depo-Provera (IM injection); Depo-SubQ Provera 104 (subcutaneous injection); Provera (tablets); medroxyprogesterone acetate (IM injection); medroxyprogesterone acetate (subcutaneous injection); medroxyprogesterone acetate (tablets); or other.

V. MENINGIOMA DIAGNOSIS

1. Please select any and all diagnoses that You allege are related to Your DMPA use (check all that apply:

   ☐ Intercranial meningioma ☐ Spinal meningioma ☐ Other Injuries:

   _____

2. Have You been diagnosed with more than one meningioma? ☐ **Yes** ☐ **No**

   If Yes, How Many?

   _____

3. When was the FIRST time (month and year) you were diagnosed with the injury above?

   _____

4. When was the FIRST time (month and year) you complained of symptoms related to the diagnosis for the injury above?

   _____

5. For each of the above, please provide the date You were diagnosed with that injury, and the name and address of the health care provider or clinician who diagnosed you:

Date of Diagnosis	Name of Diagnosing Provider	Location of Diagnosing Provider

6. Have you received treatment for your meningioma diagnosis? (Check all that apply)

   □ Yes, radiation (Number of sessions: _____)

   □ Yes, radiation (Surgery was not Medically Feasible. Name of Diagnosing Provider: _____)

   □ Yes, surgery

   □ No treatment

   □ Other treatment (please identify): _____

7. If You have received treatment for your meningioma, please identify the dates of your treatment and location of your treating physicians or other health care providers:

Treatment type (radiation, surgery)	Date(s) of treatment	Name of Treating Health Care Provider/Clinic	Location of Treating Health Care Provider/Clinic

8. What was the last date of treatment or medical care for your meningioma?

_____

9. If you are under active surveillance, is your meningioma currently stable?

☐ Yes ☐ No ☐ I don't know

10. Are You alleging that you have suffered any permanent injuries (such as blindness, blurred vision, numbness, paralysis, or headaches) resulting from Your meningioma diagnosis or treatment?

☐ Yes ☐ No ☐ I don't know

If yes, please describe: _____

11. Has any healthcare provider told you that any injury identified above is related to your Depo-Provera / medroxyprogesterone acetate use? □ Yes □ No □ I don't know

If yes, please state the name and address (city and state) of each such provider:

If yes, please state the name and address (city and state) of each such provider:

_____

_____

VI. MEDICAL HISTORY

1. Identify each primary care provider, neurologist, neurosurgeon, gynecologist (including any ob-gyn), hospital or other facilities who have seen or treated you during the time-period beginning ten (10) years prior to your first use of Depo-Provera / medroxyprogesterone acetate through the present:

Name	Specialty	Years Seen	Reason for Seeing

2. Identify each medical and/or prescription medication insurance plan you have held for the five (5) years prior to your first use of Depo-Provera / medroxyprogesterone acetate to the present [please also identify times when self-insured or uninsured]:

Name of Insurance Plan	Date(s) (MM/YYYY)

3. Identify the forms of contraception that You have used, and the dates (MM/YYYY) of use:

Contraceptive Method	Dates of Use

4. Please indicate whether you have ever experienced, been diagnosed with, or been treated for any of the following conditions.

Condition	Yes	No	Unknown
Breast cancer			
Neurofibromatosis type 2 (NF2)			
Cowden syndrome			
Gorlin syndrome			
Werner syndrome			
Diagnosed obesity			
BAP 1 mutation			
Non-Cancerous tumors			
Headache/Migraine			
Seizure Disorder			
Visual Impairment/Blurred Vision			
Diplopia			
Hearing Loss/Tinnitus			
Dizziness or Vertigo			
Anosmia			
Ataxia			
Hemiparesis			
Focal Neurologic Deficit			
Paresthesia			
Aphasia			
Cognitive Impairment			
Dementia			
Dysarthria			
Hydrocephalus			

5. Current Height: _____

6. Current Weight: _____

7. Weight at time of Meningioma Diagnosis: _____

8. Have you ever used hormone replacement therapy? ☐ Yes ☐ No

   If yes, identify:

   Product(s) used: _____

   Name and Address of prescriber: _____

   Dates/timeframe used: _____

9. Have you ever had radiation treatment to your head? If so, please provide the dates and locations of your treatment:

Dates of Treatment	Reason for Treatment	Name of Treater or Clinic	Location of Treater or Clinic

10. Have any of your blood relatives been diagnosed with meningioma (i.e., parents, grandparents, children, siblings, aunts/uncles)? ☐ Yes ☐ No ☐ I don't know

11. If yes, provide the relative's relationship to you, location of meningioma, age at diagnosis, treatment received, and prognosis/outcome:

    _____

12. Have you been screened or tested for any genetic risk factor associated with meningioma? □ Yes □ No □ I don't know

VII. DAMAGES

1. Do you claim, or plan to claim, that you have suffered emotional, mental, or psychological injury as a result of Your Depo-Provera / medroxyprogesterone acetate use? ☐ Yes ☐ No

   If yes, state the nature and the dates of the alleged injury and healthcare provider(s) who have treated you for such injury: _____

   _____

2. Have you paid or incurred any medical expenses, including amounts billed or paid by insurers and other third-party payors, which are related to any condition which you claim was caused by Depo-Provera and/or medroxyprogesterone acetate for which you seek recovery in the action which you have filed? ☐ Yes ☐ No

   If yes, please provide the best estimate of the total amount of such expenses:

   $_____

3. Do you claim or expect to claim that you lost earnings or suffered impairment of earning capacity as a result of any condition that you believe was caused by Depo-Provera and/or medroxyprogesterone acetate? ☐ Yes ☐ No. If yes state:

   The total amount of time for which lost wages will be claimed:
   $_____

   Your earned income for the time period beginning five (5) years prior to your first use of Depo-Provera / medroxyprogesterone acetate through the present:

Year	*Income*
_____	$_____
_____	$_____
_____	$_____
_____	$_____
_____	$_____

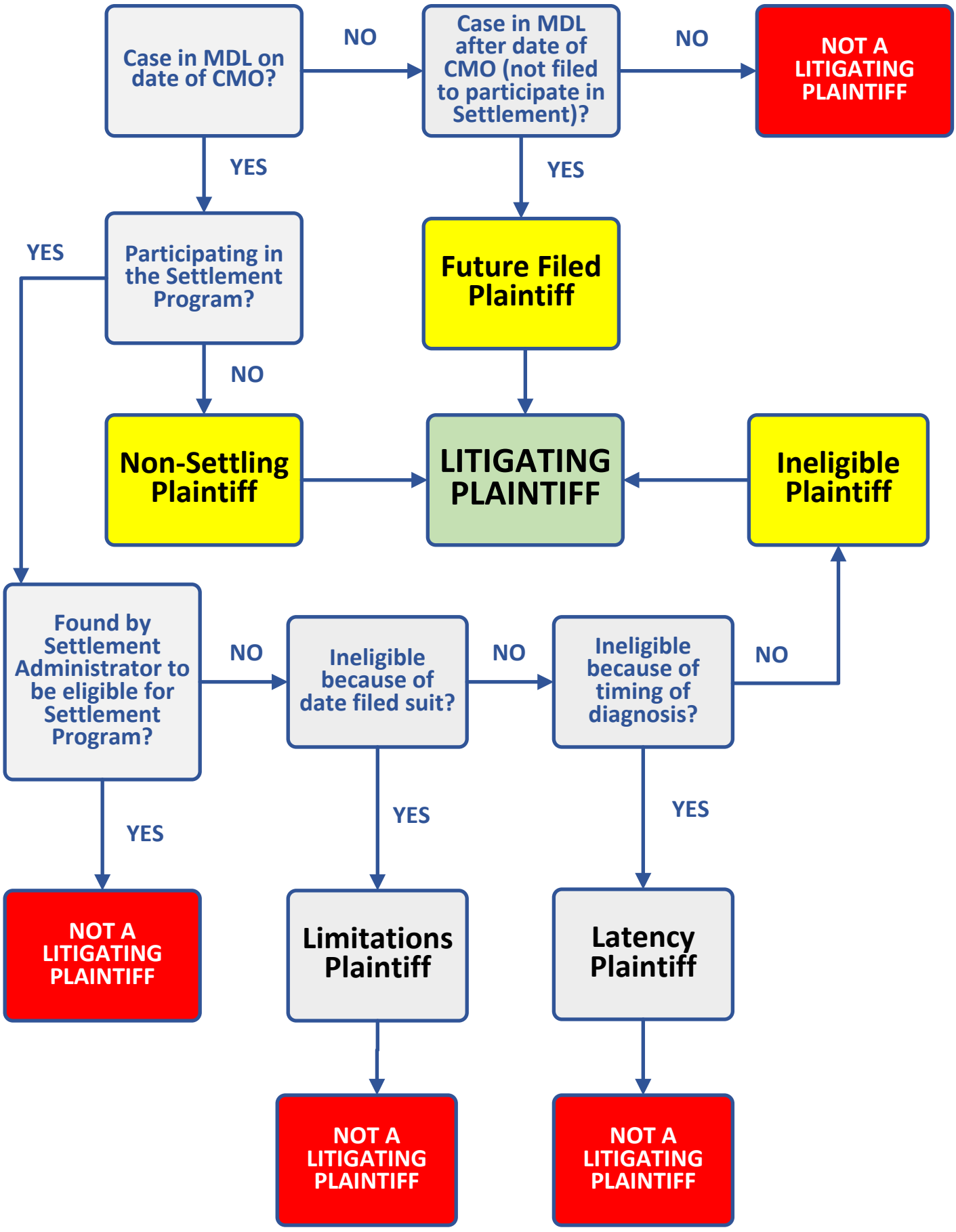
VIII. VERIFICATION

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the information provided in this Plaintiff Fact Sheet is true and correct to the best of my knowledge, information, and belief formed after a reasonable inquiry. I understand that I am under an obligation to supplement these responses.

Date:_____ Name: _____

Signature:_____

WHO IS A LITIGATING PLAINTIFF?



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

CMO Deadlines Relating to Litigating Plaintiffs

REQUIREMENT	NON-SETTLING PLAINTIFFS	INELIGIBLE PLAINTIFFS	FUTURE FILED PLAINTIFFS
Send Preservation Notices (¶ 18; deadlines in ¶ 20)	▪ 60 days after Plaintiff becomes Non-Settling by not participating in the Settlement Program	▪ 60 days after the Settlement Administrator determined the Plaintiff is ineligible	▪ 60 days after filing case in MDL or case is transferred to MDL
Statement of Compliance on Preservation Notices (¶ 21; deadlines in ¶ 20)			
Preservation Notice Cure Period (¶ 22)	▪ 30 days from Order directing cure		
Response by Defendants to Complaint (¶ 24)	▪ 21 days after Plaintiff becomes Non-Settling by not participating in the Settlement Program	▪ 21 days after the Settlement Administrator determined the Plaintiff is ineligible	▪ 21 days after docketing in MDL
Mandatory Disclosures and Productions: **(a) Initial Disclosures** **(b) Plaintiff Fact Sheet** **(c) Proof of Use** **(d) Proof of Injury** **(e) Medical Records** **(f) Documents Relating to Injuries** **(g) Non-Privileged Communications** (¶ 25; deadlines in ¶ 31)	▪ 90 days after Plaintiff becomes Non-Settling by not participating in the Settlement Program	▪ 90 days after the Settlement Administrator determined the Plaintiff is ineligible	▪ 90 days after filing case in MDL or case is transferred to MDL
Records Collection and Production (¶ 26; deadlines in ¶ 31)			
Affidavit by Counsel for a Litigating Plaintiff (¶ 27; deadlines in ¶ 31)			
Identification of Choice of Law (¶ 28; deadlines in ¶ 31)			
Litigating Plaintiff's Expert Reports (¶ 29; deadlines in ¶ 31)			

CMO DEADLINES RELATING TO LITIGATING PLAINTIFFS			
REQUIREMENT	**NON-SETTLING PLAINTIFFS**	**INELIGIBLE PLAINTIFFS**	**FUTURE FILED PLAINTIFFS**
Production Cure Period (¶ 32)	▪ 30 days from Order directing cure		
Mandatory Mediation (¶ 33)	▪ Commence within 90 days after production and expert requirements fulfilled and continue for at least 90 days		
Mandatory Status Conference and Attestation of Compliance (¶s 34-35)	▪ Set by separate Order for each Litigating Plaintiff		
Future Filed Plaintiffs Alleging Meningioma Before 3/27/24—Certification on Statute of Limitations (¶ 36)			▪ 30 days after filing case in MDL or case is transferred to MDL
Future Filed Plaintiffs—Affidavit on Discovery of Claim (¶ 37)			▪ 90 days after filing case in MDL or case is transferred to MDL
Proposed Scheduling Order (¶ 38)	▪ If Mandatory Mediation is unsuccessful and after compliance with requirements of CMO		
Case Management Conference (¶ 40)	▪ After ruling on any summary judgment motions		