

**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

**PRETRIAL ORDER NO. 12
(Stipulated Order Regarding Service through MDL Centrality)**

The Parties have agreed to accept online submission and service of Complaints in actions directly filed in or transferred to MDL No. 3140, in the interest of efficiency and judicial economy.

1. *Manner of Submission and Service.* Plaintiffs and Defendants must use the online MDL Centrality System designed and provided by BrownGreer PLC and accessible at www.mdlcentrality.com to submit and serve Complaints filed in the Master Docket, as well as such other notices, discovery, and documents as the Parties may agree in the future, as follows:

A. Each Plaintiff, by counsel or *pro se*, must establish a secure online portal in the MDL Centrality online system and obtain authorized usernames and secure login passwords to permit use of MDL Centrality by such counsel or Plaintiff with fourteen (14) days of filing their Complaint or transfer to this MDL.

For cases already filed in, or transferred to, this District, counsel will have fourteen (14) days after being notified by Court order that the online system is operative.¹ Except as set forth herein, counsel for a Plaintiff, or each *pro se* Plaintiff, will be permitted to view, search, and download on MDL Centrality only those materials submitted by that Plaintiff, and by Defendants relating to that Plaintiff, and not materials submitted by or relating to other Plaintiffs.

B. Each Defendant must, through counsel, establish a secure online portal with the MDL Centrality online system and obtain authorized usernames and secure login passwords to permit use of MDL Centrality by Defendant's counsel. At least one attorney for each Defendant must create an MDL Centrality account for this litigation within fourteen (14) days after being notified of the opportunity to register. *See supra* ¶ 1.A n1.

C. Plaintiffs' Lead Counsel² and Executive Committee will have access to and be able to view, search, and download all materials submitted by all Plaintiffs and all Defendants.

¹ BrownGreer has represented that the MDL Centrality online system is prepared to be operative as soon as the Court orders. For the sake of clarity, the Court will enter a separate order notifying all Parties of the date from which this fourteen-day period begins to run for cases that are currently pending in this District.

² For purposes of this Order, Lead Counsel includes any attorney(s) appointed as Co-Lead Counsel in the future.

D. Each Plaintiff and Defendant must use the MDL Centrality System to obtain, complete, or upload data, and must serve the appropriate documents online (including the upload of PDFs or other electronic records required by the Plaintiff Proof of Use/Injury Questionnaire).

E. Submission of a completed Document will be deemed to occur when the submitting party has performed each of the steps required by the MDL Centrality System to execute the online submission of the materials, and the submitting party has received confirmation on screen that the Document has been successfully submitted. The records maintained by MDL Centrality concerning service will be presumed authoritative for purposes of establishing service. Service of a Complaint in this manner is deemed to be effective service under Fed. R. Civ. P. 4.

F. On upload of any Complaint or other document to the MDL Centrality online system, each party being served must be automatically notified by the MDL Centrality system of service via email at the email address associated with such Parties' username and service will be deemed to occur upon issuance of such email.

G. To expedite and streamline service of directly filed complaints, the Defendants (Pfizer Inc.; Pharmacia, LLC; Pharmacia & Upjohn Company, LLC; Greenstone LLC; Viatris, Inc.; and Prasco, LLC) have agreed to service via MDL-

Centrality. For any other named Defendant(s), Plaintiffs must effectuate service of process in accordance with the Federal Rules of Civil Procedure. However, for any newly named Defendant in this MDL, within fourteen (14) days of being included and served via a direct-filed complaint, such new Defendant(s) must meet and confer with the Parties to utilize the MDL Centrality system for service and become compliant with the provisions herein.

H. The Court may establish a secure online portal with the MDL Centrality online system and obtain an authorized username and secure login password to permit use of MDL Centrality by the Court (and Special Masters, as the Court may direct) for access to reports and data regarding the Plaintiff Proof of Use/Injury Questionnaire served through MDL Centrality.

2. HIPAA Authorizations. By using MDL Centrality, each Plaintiff authorizes the disclosure of his or her medical records and other health information submitted to BrownGreer as the administrator of the MDL Centrality System, the Court, Plaintiffs' Leadership and Defendants, and to the authorized agents, representatives and experts of the foregoing, in accordance with and as permitted by the terms of the Stipulated Order Governing Confidentiality, PTO No. 11. BrownGreer is responsible for the maintenance and confidentiality of records contained on the MDL Centrality System.

3. *No Impact on Privileges or Work Product Protection.* The use of MDL Centrality by any party will not alter or otherwise waive or affect any attorney-client privilege or work product doctrine protection otherwise available that would otherwise apply to a document in the absence of the use of MDL Centrality. Any notations placed on materials, comments entered, or documents stored or uploaded to MDL Centrality by a user will be considered to be the work product of such user unless and until the material is served on or purposefully disclosed to the opposing party through the use of MDL Centrality or otherwise. Pursuant to Rule 502(d) of the Federal Rules of Evidence, this Order applies with respect to privilege and work product doctrine protection to any other federal or state proceeding, and the use of MDL Centrality in this litigation therefore will not constitute a waiver in another federal or state proceeding as to any document.

4. *No Impact on the Scope of Discovery.* Use or action in MDL Centrality will not be deemed to limit the scope of inquiry at depositions and/or admissibility of evidence at trial. The scope of inquiry at depositions will remain governed by the Federal Rules of Civil Procedure, and the admissibility of information will be governed by the Federal Rules of Evidence and applicable law. No objections or rights are waived as a result of any response in the Plaintiff Proof of Use/Injury Questionnaire.

5. ***ECF Notifications:*** The Clerk of Court should take all the steps necessary to include BrownGreer as the MDL Centrality Administrator as an interested party for purposes of receiving emailed ECF notifications related to this matter.

6. ***Decommissioning.*** The Parties must negotiate the decommissioning of the MDL Centrality System at an appropriate future time, through an Order of the Court.

SO ORDERED this 14th day of March, 2025.

M. Casey Rodgers

M. CASEY RODGERS
UNITED STATES DISTRICT JUDGE