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NIGH GOLDENBERG
RASO & VAUGHN

EXHIBIT B

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

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

This Document Relates to:
[CASE NAME]

Case No. 3:25-md-3140

Judge M. Casey Rodgers
Magistrate Judge Hope T. Cannon

Designated Forum: [DISTRICT
AND DIVISION]

COMPLAINT

Plaintiff, [NAME], by and through the undersigned counsel, brings this civil action against Defendants for personal injuries and damages suffered by Plaintiff and alleges as follows:

THRESHOLD ALLEGATIONS

1. Plaintiff is a resident and citizen of [STATE].
2. Defendant Pfizer Inc. (“Pfizer”) is a corporation organized under Delaware law with its principal place of business at The Spiral, 66 Hudson Boulevard East, New York, New York 10001, and is a citizen of Delaware and of New York for the purposes of diversity under 28 U.S.C. § 1332(a).
3. Defendant Viatris Inc. (“Viatris”) is a corporation organized under Delaware law with its principal place of business in Pennsylvania. For purposes of jurisdiction based on diversity under 28 U.S.C. § 1332(a), therefore, Viatris is a

citizen of Delaware and Pennsylvania.

4. Defendant Greenstone LLC (“Greenstone”) is a limited liability company organized and existing under the law of Delaware. Greenstone LLC has one member, Upjohn US 2 LLC, which is a limited liability company organized and existing under the law of Delaware. Upjohn US 2 LLC has one member, Upjohn US Holdings Inc., which is a corporation organized and existing under the law of Delaware with its principal place of business in Pennsylvania. For purposes of jurisdiction based on diversity under 28 U.S.C. § 1332(a), therefore, Greenstone LLC is a citizen of Delaware and Pennsylvania.

5. Defendant Pharmacia & Upjohn Company LLC (“Pharmacia & Upjohn”) is a Delaware limited liability company with two members, Pharmacia & Upjohn LLC and Anacor Pharmaceuticals, LLC. Pharmacia & Upjohn LLC is a Delaware limited liability company, whose sole member is Pharmacia LLC. Pharmacia LLC is a Delaware limited liability company, whose sole member is Wyeth Holdings LLC, which is a Maine limited liability company. Its sole member is Anacor Pharmaceuticals, LLC, a Delaware limited liability company, whose sole member is Pfizer MAP Holding, Inc., which is organized under Delaware law and has a principal place of business in New York, New York. Defendant Pharmacia & Upjohn is therefore a citizen of Delaware and New York for the purposes of diversity under 28 U.S.C. § 1332(a).

6. Defendant Pharmacia LLC (“Pharmacia”) is a Delaware limited liability company. As outlined above, its sole member is Wyeth Holdings LLC, and the sole member of Wyeth Holdings LLC is Anacor Pharmaceuticals, LLC. The sole member of Anacor Pharmaceuticals, LLC is Pfizer MAP Holding, Inc., which is a corporation organized under Delaware law with a principal place of business in New York, New York. Defendant Pharmacia is a citizen of Delaware and New York for the purposes of diversity under 28 U.S.C. § 1332(a).

7. The Designated Forum (the federal district in which the Plaintiff would have filed his or her case in the absence of direct filing in the MDL Court) is [DISTRICT AND DIVISION].

8. Plaintiff was administered the prescription drug depot medroxyprogesterone acetate (“DMPA”). The brand name for this prescription drug is Depo-Provera® (“Depo-Provera”).

9. Plaintiff has been diagnosed with intracranial meningioma that resulted from or was exacerbated by Plaintiff’s use of Depo-Provera.

[BODY OF COMPLAINT TO FOLLOW]