

NIGH GOLDENBERG
RASO & VAUGHNSUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

IN RE DEPO-PROVERA LITIGATION

STIPULATED ORDER
REGARDING THE
DISCONTINUANCE OF
CLAIMS AGAINST
GREENSTONE LLC AND
VIATRIS INC.

INDEX NO. 788000/2025

**Stipulated Order Regarding the Discontinuance of Claims
Against Greenstone LLC and Viatris Inc.**

1. This stipulated pretrial case management order sets forth processes and deadlines for discontinuing claims against Defendants Greenstone LLC (“Greenstone”) and Viatris Inc. (“Viatris”) (together, with Greenstone, the “Greenstone Defendants”).

2. Plaintiffs’ Liaison Counsel, on behalf of all Plaintiffs in this coordinated litigation, and counsel for the Greenstone Defendants have met and conferred and agree the Greenstone Defendants should be dismissed without prejudice from cases in this coordinated litigation through voluntary discontinuances.¹ Plaintiffs’ Liaison Counsel will also exert their best efforts to encourage other counsel with any case hereinafter filed in or coordinated with this litigation that names Greenstone or Viatris as a Defendant to promptly discontinue without prejudice claims against those Defendant(s).

¹ The Court is relying on these representations in granting this request and dismissing those cases listed in Exhibit A; however, to the extent any individual counsel with a case listed in Exhibit A disagrees with the dismissal of the Greenstone Defendants, that counsel must file a notice to that effect within 14 days of entry of this Order. Failure to do so will constitute a waiver of any objection to Greenstone and/or Viatris’ dismissal from that case.

3. Accordingly, the Court having been fully advised, ORDERS as follows:
- a. Pursuant to N.Y. C.P.L.R. § 3217(b), all claims against Greenstone and Viatris are DISCONTINUED without prejudice from all cases naming Greenstone or Viatris as a Defendant that are currently pending in this coordinated litigation, as more specifically identified in Exhibit A to this Order. This Order shall be docketed by the Court on the coordinated docket and also on the individual docket of each case listed in Exhibit A. The discontinuance is effective 14 days after the entry of this Order on the Plaintiffs' individual dockets, unless an objection is raised by individual counsel before that time. *See* footnote 1, *supra*.
 - b. For any case naming Greenstone or Viatris as a Defendant that is subsequently filed in, transferred to, or coordinated or consolidated with this coordinated litigation after the date of this Order, or that currently is pending against Greenstone or Viatris in this coordinated litigation but is not identified in Exhibit A, upon service of the complaint, the Greenstone Defendants shall promptly file a notice of the issuance of this Order on the individual docket of such case. In providing such notice, the Greenstone Defendants will not be deemed to have waived—and, instead, have expressly preserved—all available objections and defenses, including, but not limited to, challenges to the propriety of service of process, the existence of personal jurisdiction, and the substantive viability of the Plaintiff's underlying claims. Pursuant to N.Y. C.P.L.R. § 2214(d), Plaintiff in such case will have 14 days from the date notice of this Order is docketed in the individual case to show cause why their claims against Greenstone or Viatris should not be discontinued without prejudice pursuant to N.Y. C.P.L.R. § 3217(b) and this Order. Greenstone

and Viatris will have 14 days from the date of filing of any show cause response to file a reply to such response. If Plaintiff does not file a show cause response within the 14 days provided by this Order, the Greenstone Defendants shall file a notice of non-opposition with the Court and request that the Court issue an Order of discontinuance without prejudice. Any Plaintiff in such a case is hereby put on notice that failure to file a show cause response in accordance with this Order will result in a discontinuance without prejudice of claims against Greenstone or Viatris.

- c. Insofar as the Plaintiffs agree that the Greenstone Defendants should be dismissed from this coordinated litigation because Pfizer was the actual manufacturer of the product at issue, such that the Greenstone Defendants are no longer expected to be active parties to these proceedings, counsel for the Greenstone Defendants shall not be required to plead, appear for, and participate in matters in these coordinated proceedings except as set forth in, and to ensure compliance with, this Order, absent further direction of the Court.

IT IS SO ORDERED.

Date:

10/29/2025



Hon. Sabrina Kraus

EXHIBIT A

No.	Plaintiff/Filing Date	Court	Counsel
1	Ericka Dawson 3/21/25	Bronx Co., NY 806453/2025E	Weitz & Luxenberg
2	Terri Fidler 3/21/25	New York Co., NY 153720/2025	Weitz & Luxenberg; Anapol Weiss
3	Mara Marini 3/21/25	New York Co., NY 153715/2025	Weitz & Luxenberg; Anapol Weiss
4	Linda Sattler 3/21/25	New York Co., NY 153713/2025	Weitz & Luxenberg; Anapol Weiss
5	Diane Varley 3/21/25	New York Co., NY 153717/2025	Weitz & Luxenberg; Anapol Weiss
6	Tracey Allen-Murray 3/24/25	New York Co., NY 153898/2025	Weitz & Luxenberg
7	Mary E. Masterson 3/24/25	New York Co., NY 153889/2025	Harding Mazzotti
8	Holly McLean 3/24/25	New York Co., NY 153819/2025	Weitz & Luxenberg
9	Stephanie Mitchell 3/24/25	New York Co., NY 153897/2025	Weitz & Luxenberg
10	Malikah Weston 3/24/25	New York Co., NY 153818/2025	Weitz & Luxenberg
11	Kimberly Hamilton 3/25/25	New York Co., NY 154003/2025	Gori Law Firm
12	Lisa Lopez 3/25/25	New York Co., NY 153978/2025	Weitz & Luxenberg
13	Erin O'Malley 3/25/25	New York Co., NY 153976/2025	Weitz & Luxenberg
14	Kristen Stocks 3/25/25	New York Co., NY 153999/2025	Weitz & Luxenberg
15	Meredith Truman 3/25/25	New York Co., NY 153980/2025	Weitz & Luxenberg
16	Betsy Atkinson 3/26/25	New York Co., NY 154042/2025	Weitz & Luxenberg
17	Lynna Bank 7/3/25	New York Co., NY 158471/2025	Harding Mazzotti
18	Crystal Grant 3/26/25	New York Co., NY 154047/2025	Sbaiti & Company
19	Franceen Lonergan 3/26/25	New York Co., NY 154020/2025	Douglas & London
20	Sheena Mason 3/26/25	New York Co., NY 154022/2025	Douglas & London
21	Danielle Matthews 3/26/25	New York Co., NY 154033/2025	Weitz & Luxenberg
22	Danilia McFarlane 3/26/25	New York Co., NY 154039/2025	Seeger Weiss

23	Trina Moslih 3/26/25	New York Co., NY 154041/2025	Seeger Weiss
24	Deshemia Sanders 3/26/25	New York Co., NY 154048/2025	Lynch Carpenter
25	Regina Tisdale 3/26/25	New York Co., NY 154043/2025	Weitz & Luxenberg
26	Catherine Tutko 3/26/25	New York Co., NY 154038/2025	Weitz & Luxenberg
27	Alycia Frosell 7/2/25	New York Co., NY 158496/2025	Harding Mazzotti
28	Concessa Avila 3/27/25	New York Co., NY 154089/2025	Weitz & Luxenberg
29	Julie Ayala 3/27/25	New York Co., NY 154095/2025	Seeger Weiss
30	Tanaya Brand 3/27/25	New York Co., NY 154108/2025	Seeger Weiss
31	Nafisatou Cisse 3/27/25	New York Co., NY 154097/2025	Seeger Weiss
32	Latoya Duncan 3/27/25	New York Co., NY 154093/2025	Weitz & Luxenberg
33	Rebecca Spraker 6/6/25	New York Co., NY 157234/2025	Harding Mazzotti
34	Susan Faus 3/27/25	New York Co., NY 154096/2025	Weitz & Luxenberg
35	Elizabeth Fleurisma 3/27/25	New York Co., NY 651690/2025	Weitz & Luxenberg
36	Amanda Grunthner 3/27/25	New York Co., NY 154132/2025	Weitz & Luxenberg
37	Jeneta King 3/27/25	New York Co., NY 154103/2025	Weitz & Luxenberg
38	Jacqueline Reilly 5/8/25	New York Co., NY 156019/2025	Weitz & Luxenberg
39	Heather McCall 3/27/25	New York Co., NY 154155/2025	Weitz & Luxenberg
40	Starr Samuels 3/27/25	New York Co., NY 154086/2025	Weitz & Luxenberg
41	Rayvin Brooks 5/8/25	New York Co., NY 156018/2025	Weitz & Luxenberg
42	Laquesha Moye 5/29/25	New York Co., NY 156907/2025	Weitz & Luxenberg
43	Ashley Ramos 8/22/25	Queens Co, NY 724564/2025	Napoli Shkolnik
44	Rabia Rashid (dec'd) Muhammed Rashid 9/17/2025	Westchester Co., NY 71121/2025	Napoli Shkolnik