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NANCY KHARSA

ELECTRONICALLY FILED
Superior Court of California
County of Alameda
06/29/2026

Chad Finke, Executive Officer / Clerk of the Court

By: A. Gospel Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

DEPO-PROVERA CASES

26CV196713
Case No.: JCCP5375

THIS DOCUMENT RELATES TO:

NANCY KHARSA,

Plaintiff,

v.

PFIZER INC.; PHARMACIA &
UPJOHN CO. LLC; PHARMACIA LLC;
UPJOHN COMPANY LLC; PLANNED
PARENTHOOD GOLDEN GATE
WOMEN'S HEALTH; PLANNED
PARENTHOOD MAR MONTE, INC.;
CHINESE HOSPITAL ASSOCIATION;
AHMC SETON MEDICAL CENTER
LLC, and DOES 1 through 100, inclusive,

Defendants.

**SHORT FORM COMPLAINT FOR
DAMAGES AND DEMAND FOR JURY
TRIAL**

1 The Plaintiff named below files this Short Form Complaint and Demand for Jury Trial
2 against the Defendant(s) selected in Paragraph 4. Plaintiff incorporates by reference the allegations
3 and the relief sought in Plaintiffs' Master Complaint and Demand for Jury Trial ("Master
4 Complaint"), filed in Depo-Provera Cases, JCCP No. 5375. Plaintiff files this Short Form Complaint
5 as required by the Court. As necessary, Plaintiff may include (a) additional Counts and supporting
6 allegations against Defendants, as set forth in Paragraphs 9 and 10 below and/or (b) additional claims
7 and allegations against Other Defendants not listed in the Master Complaint as set forth in Paragraph
8 4.c below. If necessary, Plaintiff has attached additional pages to this Short Form Complaint.

9
10 **PARTIES, JURISDICTION, AND VENUE**

11 **A. PLAINTIFF**

- 12 1. Plaintiff, NANCY KHARSA ("Plaintiff"), is a resident and citizen of San Francisco,
13 California.
- 14 2. Plaintiff alleges that venue lies in County of San Francisco pursuant to § 395(a) of
the California Code of Civil Procedure because (*check all that apply*):

15 ☒ The injuries alleged herein occurred in this county.

16 ☒ At the commencement of the action, a Defendant resided in this
17 county.

- 18 3. Plaintiff brings this action (*check all that apply*):

19 ☒ On behalf of herself;

20 ☐ In representative capacity of the individual that sustained personal
21 injuries and damages, [INJURED PARTY FIRST NAME]
[INJURED PARTY LAST NAME], who is/was a citizen and resident
22 of [CITY, STATE];

23 ☐ For loss of society or consortium and their relationship to the
24 following individual of which Plaintiff's claims are derivative:
[INJURED PARTY FIRST NAME] [INJURED PARTY LAST
25 NAME], who sustained personal injuries and damages as a result of
her use of Defendants' products.

26 If any box is checked other than the first box, all references to Plaintiff in Paragraphs
27 4 through 8 of this Short Form Complaint refer to the primary injured party.

B. DEFENDANT(S)

4. Plaintiff names the following Defendants in this action (*check all that apply*):

a. Manufacturing Defendants

☒ PFIZER INC.

☒ PHARMACIA LLC

☒ PHARMACIA & UPJOHN COMPANY LLC

b. Healthcare Defendants

☐ THE PERMANENTE MEDICAL GROUP, INC.

☐ SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP

c. Other Defendants. For each "Other Defendant," Plaintiff contends these additional parties are liable or responsible for Plaintiff's damages. Plaintiff may attach additional pages to this Short Form Complaint, if necessary.

☒ PLANNED PARENTHOOD GOLDEN GATE WOMEN'S HEALTH, Citizenship: San Francisco, CA.

☒ PLANNED PARENTHOOD MAR MONTE, INC., Citizenship: San Jose, CA.

☒ CHINESE HOSPITAL ASSOCIATION, Citizenship: San Francisco, CA.

☒ AHMC SETON MEDICAL CENTER LLC, Citizenship: Alhambra, CA.

PRODUCT USE

5. Plaintiff used Depo-Provera from approximately 1999 to 2024.

INJURIES

6. As a result of using Depo-Provera, Plaintiff was diagnosed with a meningioma in approximately February of 2026.

7. As a result of using Depo-Provera, Plaintiff suffered and/or continues to suffer from the following additional injuries.

☐ Dizziness

☐ Vertigo

☐ Double vision

☒ Headaches

☐ Imbalance

☐ Weakness in limbs

☐ Depression

☒ Other:

- Physical Pain
- Mental Suffering
- Loss of Enjoyment of Life
- Inconvenience
- Anxiety
- Emotional Distress

8. Defendants proximately caused Plaintiff's injuries.

CAUSES OF ACTION ASSERTED

9. The following claims and allegations are asserted by Plaintiff in the Master Complaint and are herein adopted by reference.

☒ Count I – Strict Products Liability – Failure to Warn

☐ Count II – Strict Products Liability – Design Defect

☐ Count III – General Negligence

☒ Count IV – Negligent Failure to Warn

☒ Count V – Negligent Design

☒ Count VI – Negligent Misrepresentation

☒ Count VII – Fraud - Intentional Misrepresentation

☐ Count VIII – Violation of Consumer Protection Laws

☒ Count IX – Other: _____

☐ Against all Defendants.

☒ Against only the following Defendants:

Counts I and IV-VII are alleged against Pfizer Inc.; Pharmacia LLC;

Pharmacia & Upjohn Company LLC.

☒ Count X – Other: _____

☐ Against all Defendants.

☒ Against only the following Defendants: Counts I and IV are alleged

against Planned Parenthood Golden Gate Women's Health; Planned

1 Parenthood Mar Monte, Inc.; Chinese Hospital Association; AHMC
2 Seton Medical Center LLC.

3 Plaintiff may attach additional pages to this Short Form Complaint, if necessary.

- 4 10. If applicable, Plaintiff asserts the following additional factual allegations against
5 Defendants: As to Planned Parenthood Golden Gate Women's Health; Planned
6 Parenthood Mar Monte, Inc.; Chinese Hospital Association; and AHMC Seton
7 Medical Center LLC, from whom Plaintiff received Depo Provera injections, this
8 matter is filed less than 3 years after the statute of limitations began to run under CCP
9 340.5. Plaintiff was not reasonably aware of a negligent cause of her injury, nor did
10 she have a meaningful suspicion of negligence until a date less than three years from
11 the date of filing this complaint. As to the Manufacturing Defendants, this complaint
12 is filed less than two years from the date of discovery of her injury and knowledge of
13 a wrongful cause. (Code of Civil Procedure §335.1.)

14
15 **JURY DEMAND**

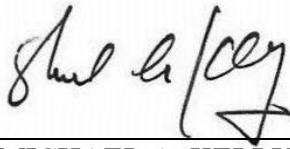
- 16
17 11. Plaintiff hereby demands a trial by jury as to all claims in this action.

18 **PRAYER FOR RELIEF**

19 **WHEREFORE**, Plaintiff has been damaged as a result of Defendants' actions or inactions
20 and demands judgment against Defendants on each of the above-referenced causes of action, jointly
21 and severally to the full extent available in law or equity, as requested in the Master Complaint for
22 compensatory and punitive damages.

23 Dated: June 26, 2026

WALKUP, MELODIA, KELLY & SCHOENBERGER

24
25 By: 

26 MICHAEL A. KELLY

DORIS CHENG

27 AMALIE YACH

Attorneys for PLAINTIFF NANCY KHARSA
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