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County of Alameda
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

DEPO-PROVERA CASES

Case No.: JCCP5375

THIS DOCUMENT RELATES TO:

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

AMBER LOCKWOOD and MATTHEW
LOCKWOOD,

Plaintiffs,

v.

PFIZER INC.; PHARMACIA &
UPJOHN CO. LLC; PHARMACIA LLC;
UPJOHN COMPANY LLC; PLANNED
PARENTHOOD OF THE PACIFIC
SOUTHWEST, and DOES 1 through 100,
inclusive,

Defendants.

1 The Plaintiffs named below file this Short Form Complaint and Demand for Jury Trial
2 against the Defendant(s) selected in Paragraph 4. Plaintiffs incorporate 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. Plaintiffs file this Short Form Complaint
5 as required by the Court. As necessary, Plaintiffs 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, Plaintiffs have attached additional pages to this Short Form Complaint.

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

11 **A. PLAINTIFFS**

- 12 1. Plaintiffs, AMBER LOCKWOOD and MATTHEW LOCKWOOD ("Plaintiffs"), are
13 residents and citizens of El Cajon, California.
14 2. Plaintiffs allege that venue lies in County of San Diego 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. Plaintiffs bring this action (*check all that apply*):

19 ☒ On behalf of themselves;

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

23 ☒ For AMBER LOCKWOOD, who sustained personal injuries and
24 damages as a result of her use of Defendants' products; and for
MATTHEW LOCKWOOD, for loss of society or consortium
25 connected to the injuries sustained by AMBER LOCKWOOD.

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.
28

B. DEFENDANT(S)

4. Plaintiffs name 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," Plaintiffs contend these additional parties are liable or responsible for Plaintiffs' damages. Plaintiffs may attach additional pages to this Short Form Complaint, if necessary.

☒ PLANNED PARENTHOOD OF THE PACIFIC SOUTHWEST,
Citizenship: San Diego, California

☐ Click or tap here to enter text., Citizenship: Click or tap here to enter text.

☐ Click or tap here to enter text., Citizenship: Click or tap here to enter text.

☐ Click or tap here to enter text., Citizenship: Click or tap here to enter text.

PRODUCT USE

5. Plaintiff AMBER LOCKWOOD used Depo-Provera from approximately 1997 to 2014.

INJURIES

6. As a result of using Depo-Provera, Plaintiff AMBER LOCKWOOD was diagnosed with a meningioma in approximately March 2014.

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

☐ Dizziness

☐ Vertigo

☐ Double vision

☒ Headaches

☐ Imbalance

☐ Weakness in limbs

☐ Depression

☒ Other:

- Difficulty Multitasking
- Forgetfulness/memory problems
- Social Anxiety
- Inability to work
- Two surgical resections
- Difficulty with word finding
- Mental Suffering
- Loss of Enjoyment of Life
- Inconvenience
- Emotional distress
- Anxiety

8. Defendants proximately caused Plaintiff AMBER LOCKWOOD's injuries.

CAUSES OF ACTION ASSERTED

9. The following claims and allegations are asserted by Plaintiffs 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: Loss of Consortium

☐ Against all Defendants.

☒ Against only the following Defendants:

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

Pharmacia & Upjohn Company LLC.

☒ Count X – Other: _____

☐ Against all Defendants.

☒ Against only the following Defendants:

Counts I, IV, and IX are alleged against Planned Parenthood of the Pacific Southwest.

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

10. If applicable, Plaintiffs assert the following additional factual allegations against Defendants: As to Planned Parenthood of the Pacific Southwest, from whom Plaintiff Amber Lockwood received Depo Provera injections, this matter is filed less than 3 years after the statute of limitations began to run under CCP 340.5. Plaintiffs were not reasonably aware of a negligent cause of Ms. Lockwood's injury, nor did she have a meaningful suspicion of negligence until a date less than three years from the date of filing this complaint. As to the Manufacturing Defendants, this complaint is filed less than two years from the date of discovery of her injury and knowledge of a wrongful cause. (Code of Civil Procedure §335.1.)

JURY DEMAND

11. Plaintiffs hereby demands a trial by jury as to all claims in this action.

PRAYER FOR RELIEF

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

Dated: May 21, 2026

WALKUP, MELODIA, KELLY & SCHOENBERGER

By: 

MICHAEL A. KELLY

Attorneys for PLAINTIFFS

AMBER LOCKWOOD and MATTHEW LOCKWOOD