

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE ABBOTT LABORATORIES INFANT FORMULA SHAREHOLDER DERIVATIVE LITIGATION) Case No. 22 CV 5513
) Hon. Manish S. Shah
)
)

**UNOPPOSED MOTION TO EXTEND PAGE LIMIT FOR
DEFENDANTS' BRIEF IN SUPPORT OF THEIR MOTION TO DISMISS**

Defendants respectfully move this Court for an order pursuant to Local Rule 7.1 granting them leave to file a brief in support of their forthcoming motion to dismiss of up to 40 pages. In support of this motion, Defendants state the following:

1. On October 16, 2023, Plaintiffs filed their Consolidated Amended Verified Stockholders' Derivative Complaint. (Dkt. #92) The complaint asserts seven causes of action over 172 pages (more than 500 numbered paragraphs) of allegations.

2. Defendants' response to the complaint is due December 18, 2023, and they intend to move to dismiss. In consideration of the number of claims the motion must address, Defendants believe a short enlargement of the page limit, to 40 pages, is warranted.

3. On December 11, counsel for Defendants conferred with counsel for Plaintiffs regarding this motion. Counsel for Plaintiffs indicated that Plaintiffs do not oppose the relief requested herein provided that Defendants do not oppose a similar extension for their opposition brief (which Defendants confirmed).

Accordingly, Defendants respectfully request that the Court grant this unopposed motion and allow Defendants to file an opening brief in support of their motion to dismiss not to exceed 40 pages.

Dated: December 11, 2023

Respectfully submitted,

/s/ Joshua Z. Rabinovitz

Mark Filip
Joshua Z. Rabinovitz
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 862-2000
Mark.Filip@kirkland.com
Joshua.Rabinovitz@kirkland.com

James P. Gillespie
Erin E. Cady
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue NW
Washington D.C. 20004
(202) 389-5000
jgillespie@kirkland.com
Erin.Cady@kirkland.com

Counsel for the Individual Defendants

Sean Berkowitz
Eric R. Swibel
LATHAM & WATKINS LLP
330 N. Wabash Ave., Suite 2800
Chicago, IL 60611
(312) 777-7185

Counsel for Nominal Defendant