

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

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

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**MOTION FOR LEAVE TO FILE UNDER SEAL**

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Pursuant to Local Rule 26.2, Defendants hereby move the Court for an order granting them leave to file under seal their memorandum in support of the motion to dismiss (“Memorandum”) and certain accompanying exhibits. In support of this motion, Defendants state as follows:

1. This Court “may for good cause shown enter an order directing that one or more documents be filed under seal.” L.R. 26.2(b). Good cause exists for granting this motion. Defendants’ Memorandum contains information derived from Abbott’s internal books and records, which was (i) provided to Plaintiffs pursuant to a confidentiality agreement and (ii) marked “Confidential” in the good-faith belief that the documents therein contain confidential and/or commercially sensitive information. *See* Exs. 10, 12-13, and 15-76 (Abbott’s books-and-records production and an email describing contents of the same).

2. In compliance with Local Rule 26.2(c), Defendants provisionally filed their Memorandum and accompanying exhibits under seal today, December 18, 2023. Defendants also filed a redacted, public-record version of the Memorandum, with the aforementioned confidential exhibits excluded.

WHEREFORE, Defendants respectfully request that the Court grant this motion and enter an order permitting Defendants to file under seal their Memorandum and certain accompanying exhibits.

Dated: December 18, 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*

/s/ Sean Berkowitz

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

*Counsel for Nominal Defendant*