

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE ABBOTT LABORATORIES INFANT
FORMULA SHAREHOLDER DERIVATIVE
LITIGATION

This Document Relates To:

*Pembroke Pines Firefighters and Police Officers
Pension Fund v. Abbott Laboratories, et al.*, No.
1:22-cv-04661 (N.D. Ill.)

Case No. 22 CV 05513

Honorable Sunil R. Harjani

SECURITIES FRAUD PLAINTIFFS' MOTION FOR LEAVE TO INTERVENE

Third parties Quoniam Asset Management GmbH and KBC Asset Management NV (the “Securities Fraud Plaintiffs”), co-Lead Plaintiffs in related securities fraud litigation styled *Pembroke Pines Firefighters and Police Officers Pension Fund v. Abbott Laboratories, et al.*, No. 1:22-cv-04661 (N.D. Ill.) (the “Securities Fraud Action”), respectfully move for leave to intervene, pursuant to Federal Rule of Civil Procedure 24(b), for the limited purpose of asserting the right of public access and unsealing certain documents that have been filed with the Court, specifically the Consolidated Amended Verified Stockholders’ Derivative Complaint (the “Complaint”) (ECF No. 92), Memorandum In Support of Defendants’ Motion to Dismiss and the Exhibits submitted therewith (ECF Nos. 112-13), Lead Plaintiffs’ Memorandum of Law In Opposition to Defendants’ Motion to Dismiss (ECF No. 124), and Defendants’ Reply Memorandum In Support of Motion to Dismiss (ECF No. 132) (together, the “Sealed Documents”). Counsel for Defendants have informed the Securities Fraud Plaintiffs that they will oppose this motion, while counsel for Plaintiffs take no position.

Dated: August 15, 2024

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Respectfully submitted,
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