

**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. Sunil R. Harjani)

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER PLAINTIFFS' COMPLAINT**

Defendants hereby move the Court to extend their deadline to file an answer to the complaint by 21 days. Defendants' answer is currently due on September 11, 2024, and the requested extension would extend Defendants' deadline to **October 2, 2024**. In support of this motion, Defendants state:

1. On August 7, 2024, the Court granted in part and denied in part Defendants' motion to dismiss. (Dkt. #142) The Court gave Plaintiffs until August 21, 2024, to file an amended complaint. (Dkt. #141) The Court ordered that if Plaintiffs did not file an amended complaint, Defendants' answer would be due September 11, 2024. (*Id.*)
2. On August 15, 2024, counsel for Plaintiffs informed Defendants that Plaintiffs did not intend to file an amended complaint.
3. Plaintiffs' Complaint is more than 500 paragraphs, many of which contain complex, multi-part factual allegations interspersed with quotes from, or descriptions of, external documents.
4. Additionally, there are nineteen Defendants remaining in this action, and preparing the answer to Plaintiffs' complaint requires consideration of what they know individually. The requested extension would permit counsel to appropriately investigate those allegations and coordinate with these individuals.
5. This extended deadline would not change the date of any hearing, trial, or other court setting.

6. On September 4, 2024, counsel for Defendants conferred with counsel for Plaintiffs about their intent to file this motion. On September 5, 2024, Plaintiffs' counsel indicated that Plaintiffs take no position on this motion.

Dated: September 5, 2024

Respectfully submitted,

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