

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

IN RE ABBOTT LABORATORIES INFANT)
FORMULA SHAREHOLDER) Case No. 22 CV 5513
DERIVATIVE LITIGATION) Hon. Sunil R. Harjani
)
)

**NOMINAL DEFENDANT ABBOTT LABORATORIES' ANSWER TO
CONSOLIDATED AMENDED VERIFIED STOCKHOLDERS'
DERIVATIVE COMPLAINT**

Nominal Defendant Abbott Laboratories (“Abbott”), by and through its undersigned counsel, hereby responds to the Consolidated Amended Verified Stockholders’ Derivative Complaint (“Complaint”) filed in the above-captioned action as follows.

The Complaint names Abbott only as a nominal defendant, and the claims asserted in the Complaint are not asserted against Abbott, but rather purport to be brought derivatively on behalf of Abbott. Accordingly, with respect to the allegations in the Complaint, Abbott submits itself to the jurisdiction of the Court for a proper adjudication of the claims purported to be set forth therein. No further response from Abbott is required as to any allegations in the Complaint. If the Court determines that nominal defendant Abbott must respond to the Complaint, Abbott will do so.

WHEREFORE, Abbott requests judgment in such form and for such relief as the Court deems just and proper.

Dated: September 11, 2024

Respectfully submitted,

/s/ Eric R. Swibel

Eric R. Swibel
Sean M. Berkowitz
LATHAM & WATKINS LLP
330 N. Wabash Ave., Suite 2800
Chicago, IL 60611
(312) 876-7700
eric.swibel@lw.com
sean.berkowitz@lw.com

Counsel for Nominal Defendant