

**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
)	

**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 5 days. Defendants' answer is currently due on October 2, 2024, and the requested extension would extend Defendants' deadline to **October 7, 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 ordered that Defendants' answer would be due September 11, 2024. (*Id.*)

2. On September 6, 2024, the Court granted Defendants' motion to extend the deadline for filing their answer to October 2, 2024. (Dkt. #153)

3. Although Defendants have been working diligently to prepare the answer to the complaint, the requested extension will permit them time to complete the process. 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. Additionally, there are nineteen Defendants remaining in this action, and preparing the answer to Plaintiffs' complaint requires consideration of what they know individually.

4. This extended deadline would not change the date of any hearing, trial, or other court setting.

5. On October 1, 2024, counsel for Defendants conferred with counsel for Plaintiffs about their intent to file this motion. Plaintiffs' counsel indicated that Plaintiffs do not oppose the motion.

Dated: October 1, 2024

Respectfully submitted,

/s/ Joshua Z. Rabinovitz

Mark Filip
Joshua Z. Rabinovitz
KIRKLAND & ELLIS LLP
333 West Wolf Point Plaza
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, N.W.
Washington D.C. 20004
(202) 389-5000
jgillespie@kirkland.com
Erin.Cady@kirkland.com

Counsel for Defendants