

**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
)	

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 26.2, Defendants hereby move the Court for an order granting them leave to file under seal their Reply in support of their Motion to Reconsider. 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’ Reply 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* Dkt. #113-10, #113-12-13, and #113-15-76 (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 Reply under seal today, October 2, 2024. Defendants also filed a redacted, public-record version of the Reply.

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

Dated: October 2, 2024

Respectfully submitted,

/s/ Joshua Z. Rabinovitz

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