

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

*In re Abbott Laboratories Infant
Formula Shareholder Derivative
Litigation*

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No. 1:22-cv-05513

DECLARATION OF BENJAMIN L. HATCH

I, Benjamin L. Hatch, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at the law firm of McGuireWoods LLP, counsel for the independent Special Litigation Committee (the "SLC") of the Board of Directors of Nominal Defendant Abbott Laboratories ("Abbott" or the "Company") in the above-captioned action. I have previously served as an Assistant United States Attorney and Managing Assistant United States Attorney for the U.S. Attorney's Office for the Eastern District of Virginia. My partner, Louis Greenstein, previously served on the Staff in the Division of Enforcement at the Securities and Exchange Commission. And my partner, Christina Egan, is also a former Assistant United States Attorney and served as a Deputy Chief in the Criminal Division for the U.S. Attorney's Office for the Northern District of Illinois. We collectively have extensive experience prosecuting and defending matters involving allegations of securities fraud and claims related to breach of fiduciary duty and the appropriate scope of management and board oversight.

2. Attached as Exhibit A is a redacted copy of the minutes of a September 16-19, 2024 Meeting of the Board of Directors of Abbott Laboratories provided to me by Abbott Laboratories. The relevant sections from pages 10-13 describe the Board's resolution to form a Special Litigation Committee to investigate the claims in the above-captioned action.

3. Attached as Exhibit B is an excerpt of Abbott Laboratories' 2023 Notice of Annual Meeting of Shareholders and Proxy Statement filed with the U.S. Securities and Exchange Commission on March 17, 2023. The filing identifies Special Litigation Committee member Michael G. O'Grady as a new nominee for Director, which shareholders voted for at the April 28, 2023 annual meeting.

4. Attached as Exhibit C is a true and accurate copy of Mr. O'Grady's biography from the website of Northern Trust, where he serves as Chairman and Chief Executive Officer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of November 2024.


Benjamin L. Hatch