

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re Abbott Laboratories Infant Formula
Shareholder Derivative Litigation*

Case No. 1:22-cv-5513
Hon. Sunil R. Harjani
Hon. Magistrate Laura K. McNally

JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER

Lead Plaintiffs International Brotherhood of Teamsters Local No. 710 Pension Fund and Southeastern Pennsylvania Transportation Authority (collectively “Lead Plaintiffs”), and Defendants Robert B. Ford, Robert J. Alpern, Roxanne S. Austin, Claire Babineaux-Fontenot, Sally E. Blount, Paola Gonzalez, Michelle A. Kumbier, Edward M. Liddy, Darren W. McDew, Nancy McKinstry, Phebe N. Novakovic, William A. Osborn, Michael F. Roman, Daniel J. Starks, John G. Stratton, Glenn F. Tilton, Miles D. White, Christopher J. Calamari, and Robert E. Funck (collectively, “Defendants”), and nominal defendant Abbott Laboratories together with Lead Plaintiffs, the “Parties”), respectfully jointly move this Court for entry of an Agreed Confidentiality Order. The Parties have met and conferred regarding this issue and believe that good cause exists for the entry of this Order for the reasons explained at the status conference on November 21, 2024. A proposed Agreed Confidentiality Order (the “Proposed Order”) is attached.

Per the Court’s instructions, filed herewith are certifications from Lead Plaintiffs and Abbott regarding the highly confidential, attorneys-eyes only designation that the Proposed Order contemplates.

Dated: December 9, 2024

Respectfully submitted,

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Certificate of Word Count

Pursuant to Hon. Magistrate Judge Laura K. McNally's Case Procedure on Format for Motions and Briefing, the Parties certify that the foregoing document was prepared in Century Schoolbook, 12-point font, and contains 169 words.

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