

**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. Laura K. McNally

**JOINT MOTION FOR ENTRY OF ORDER REGARDING THE PROTOCOL FOR
PRODUCING DOCUMENTS AND ELECTRONICALLY STORED
INFORMATION**

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 Order Regarding the Protocol for Producing Documents and Electronically Stored Information. The Parties have met and conferred regarding this issue and believe that good cause exists for the entry of an Order to facilitate the orderly production of documents and electronically stored information in this case. In the interest of efficiency, the Parties modeled their proposal after the protocol entered by Judge Kennelly in another case involving Abbott. A

Proposed Stipulated Order Regarding the Protocol for Producing Documents and Electronically Stored Information is attached.

Dated: December 9, 2024

Respectfully submitted,

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Certificate of Word Count

Pursuant to 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 182 words.

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