

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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*In re Abbott Laboratories Infant Formula  
Shareholder Derivative Litigation*

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

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**JOINT MOTION FOR ENTRY OF REVISED 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 and Defendants, the “Parties”), respectfully jointly move this Court for entry of an Agreed Confidentiality Order. Following the December 13, 2024 status hearing, the parties made further revisions to the proposed Agreed Confidentiality Order to address the issues identified by the Court. The Parties had previously met and conferred regarding a proposed Confidentiality Order, and following the December 13, 2024 hearing, conferred further. The parties believe that good cause exists for entry of this Order. The proposed Agreed

Confidentiality Order (the “Proposed Order”) is attached.

Certifications from Lead Plaintiffs and Abbott regarding the highly confidential, attorneys-eyes only designation that the Proposed Order contemplated were previously filed with the Court.

Dated: December 26, 2024

Respectfully submitted,

*/s/ Carol V. Gilden*

Carol V. Gilden  
COHEN MILSTEIN SELLERS  
& TOLL, PLLC  
190 South LaSalle Street, Suite 1705  
Chicago, Illinois 60603  
IL Bar No. 6185530  
Tel: 312-357-0370  
cgilden@cohenmilstein.com

*/s/ Joshua Z. Rabinovitz*

Mark Filip  
Joshua Z. Rabinovitz  
KIRKLAND & ELLIS LLP  
333 West Wolf Point Plaza  
Chicago, IL 60654  
Tel: 312-862-2000  
Mark.Filip@kirkland.com  
Joshua.Rabinovitz@kirkland.com

Richard Speirs

Amy Miller  
COHEN MILSTEIN SELLERS  
& TOLL, PLLC  
88 Pine Street, 14<sup>th</sup> Floor  
New York, NY 10005  
Tel: 212-828-7791  
rspeirs@cohenmilstein.com  
amiller@cohenmilstein.com

*Counsel for the Defendants*

*/s/ Eric R. Swibel*

Sean Berkowitz  
Eric R. Swibel  
LATHAM & WATKINS, LLP  
330 N. Wabash Ave., Suite 2800  
Chicago, IL 60611  
Tel: 312-777-7185  
Sean.Berkowitz@lw.com  
Eric.Swibel@lw.com

Steven J. Toll

Molly Bowen  
COHEN MILSTEIN SELLERS  
& TOLL, PLLC  
1100 New York Ave., NW, 8<sup>th</sup> Floor  
Washington, DC 20005  
Tel: 202-408-4646  
stoll@cohenmilstein.com  
mbowen@cohenmilstein.com

*Counsel for Nominal Defendant*

*Co-Lead Counsel for Lead Plaintiffs*

*/s/ Maxwell R. Huffman*

Maxwell R. Huffman

Joseph A. Pettigrew  
SCOTT+SCOTT  
ATTORNEYS AT LAW LLP

600 W. Broadway, Suite 3300  
San Diego, CA 92101  
Tel: 619-233-4565  
mhuffman@scott-scott.com  
jpettigrew@scott-scott.com

Justin O. Reliford  
Elizabeth K. Dragovich  
SCOTT+SCOTT  
ATTORNEYS AT LAW LLP  
The Helmsley Building  
230 Park Avenue, 17<sup>th</sup> Floor  
New York, New York 10169  
Tel: 212-223-6444  
jreliford@scott-scott.com  
edragovich@scott-scott.com

Jing-Li Yu  
Melissa May  
SCOTT+SCOTT  
ATTORNEYS AT LAW LLP  
The Helmsley Building  
230 Park Avenue, 24th Floor  
New York, NY 10169  
Tel: 212-223-6444  
jyu@scott-scott.com  
mmay@scott-scott.com

Geoffrey M. Johnson  
SCOTT+SCOTT  
ATTORNEYS AT LAW LLP  
12434 Cedar Road, Suite 12  
Cleveland Heights, OH 44106  
Tel: 216-229-6088  
gjohnson@scott-scott.com

*Co-Lead Counsel for Lead Plaintiffs*

John A. Kehoe  
KEHOE LAW FIRM, P.C.  
2001 Market Street, Suite 2500

Philadelphia, PA 19103  
Tel: 215-792-6676  
jkehoe@kehoelawfirm.com

*Additional Counsel for Lead Plaintiff  
Southeastern Pennsylvania  
Transportation Authority*

**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 196 words.

/s/Carol V. Gilden

Carol V. Gilden  
COHEN MILSTEIN SELLERS  
& TOLL, PLLC  
190 South LaSalle Street, Suite 1705  
Chicago, Illinois 60603  
IL Bar No. 6185530  
Tel: 312-357-0370  
cgilden@cohenmilstein.com  
*Co-Lead Counsel for Lead Plaintiffs*

/s/Eric R. Swibel

LATHAM & WATKINS, LLP  
330 N. Wabash Ave., Suite 2800  
Chicago, IL 60611  
Tel: 312-777-7185  
Eric.Swibel@lw.com

*Counsel for Nominal Defendant*