

**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 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 contemplates were previously filed with the Court.

Dated: December 26, 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 196 words.

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