

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE ABBOTT LABORATORIES INFANT
FORMULA SHAREHOLDER DERIVATIVE
LITIGATION

Case No. 1:22-cv-05513

Hon. Sunil R. Harjani
Hon. Laura K. McNally

JOINT STATUS REPORT

Pursuant to the Court’s instruction, Plaintiffs International Brotherhood of Teamsters Local 710 Pension Fund (“Teamsters Pension Fund”) and Southeastern Pennsylvania Transportation Authority (“SEPTA” and collectively with Teamsters Pension Fund, “Plaintiffs”), Defendants,¹ and Nominal Defendant Abbott Laboratories (“Abbott”) (collectively with Plaintiffs and Defendants, the “Parties”) respectfully submit the following joint status report.

I. STATUS OF DISCOVERY

The Parties were able to agree to a mutually acceptable confidentiality order, which the Court approved on December 26, 2024.

On November 18, 2024, Abbott served objections and responses to Plaintiffs’ first set of requests for production directed to Abbott. On December 20, 2024, Abbott served objections and responses to Plaintiffs’ first set of interrogatories directed to Abbott. Also on December 20, 2024, Defendants served objections and responses to Plaintiffs’ first sets of interrogatories and requests for productions directed to Defendants.

Since then, the Parties have been engaged in good faith negotiations regarding the scope of Abbott’s and Defendants’ responses and objections. The Parties anticipate negotiating specific proposals on search parameters for electronically stored information over the coming weeks.

II. OTHER MATTERS

The Parties’ discovery negotiations to date have been amicable and productive. The Parties do not believe that there are any issues that currently warrant the Court’s intervention or attention.

The Parties will provide any further status updates as requested by the Court.

¹ “Defendants” are Robert B. Ford (“Ford”), Robert J. Alpern (“Alpern”), Roxanne S. Austin (“Austin”), Claire Babineaux-Fontenot (“Babineaux-Fontenot”), Sally E. Blount (“Blount”), Paola Gonzalez (“Gonzalez”), Michelle A. Kumbier (“Kumbier”), Edward M. Liddy (“Liddy”), Darren W. McDew (“McDew”), Nancy McKinstry (“McKinstry”), Phebe N. Novakovic (“Novakovic”), William A. Osborn (“Osborn”), Michael F. Roman (“Roman”), Daniel J. Starks (“Starks”), John G. Stratton (“Stratton”), Glenn F. Tilton (“Tilton”), Miles D. White (“White”), Christopher J. Calamari (“Calamari”), and Robert E. Funck (“Funck”).

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Dated: January 28, 2025

/s/ Carol V. Gilden

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