

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

<p><i>In re Abbott Laboratories Infant Formula Shareholder Derivative Litigation</i></p>	Case No. 1:22-cv-5513 Hon. Sunil R. Harjani Hon. Laura K. McNally
<p>MATTHEW STEELE, derivatively on behalf of ABBOTT LABORATORIES, Plaintiff, v. LORI J. RANDALL, <i>et al.</i>, Defendants, and ABBOTT LABORATORIES, Nominal Defendant.</p>	Case No. 1:25-cv-3669 Hon. Charles P. Kocoras

**MOTION FOR LEAVE TO FILE LEAD PLAINTIFFS' REPLY
IN SUPPORT OF THEIR MOTION FOR
REASSIGNMENT OF CASE AS RELATED**

Lead Plaintiffs International Brotherhood of Teamsters Local No. 710 Pension Fund (“Teamsters Pension Fund”) and Southeastern Pennsylvania Transportation Authority (“SEPTA”), by and through their undersigned counsel, respectfully move this Court for leave to file their Reply in Support of their Motion for Reassignment of Case as Related (the “Reply”).

In support of this Motion, Lead Plaintiffs state as follows:

1. On April 18, 2025, Lead Plaintiffs filed their Motion for Reassignment of Case as Related (the “Motion for Reassignment”). ECF No. 229. The Motion asserts that above-captioned cases are related and satisfy the criteria for reassignment under Local Rule 40.4.

2. Plaintiff Matthew Steele (“Steele”) filed his response to the Motion for Reassignment on May 5, 2025. ECF No. 233. Based on Steele’s response, Lead Plaintiffs believe that a brief Reply is warranted in order to aid the Court in understanding Lead Plaintiffs’ request and rationale.

3. Lead Plaintiffs’ proposed Reply is attached hereto as Exhibit 1.

WHEREFORE, for the reasons stated above, Lead Plaintiffs Teamsters Pension Fund and SEPTA respectfully request that this Court grant this Motion and permit Lead Plaintiffs to file the Reply.

Dated: May 8, 2025

Respectfully submitted,

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