

**IN THE UNITED STATES DISTRICT COURT
FOR THE 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 TO STAY ALL PENDING DEADLINES

Plaintiffs International Brotherhood of Teamsters Local No. 710 Pension Fund and Southeastern Pennsylvania Transportation Authority (together, “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 (collectively with Plaintiffs and Defendants, the “Parties”), jointly move to stay the above-captioned matter. In addition, counsel for the Parties have consulted with counsel for the Special Litigation Committee and report that the Special Litigation Committee supports this Joint Motion to Stay.

The Parties jointly seek a stay of all pending deadlines and discovery in this case for a period of 90 days following entry of a corresponding order. A brief stay will serve the interests of efficiency and judicial economy. The Parties have been conferring regarding many open issues and believe the stay will provide an opportunity to explore potential resolution without requiring Court intervention.

Dated: May 14, 2025

/s/ Carol V. Gilden

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

Steven J. Toll
Molly J. Bowen
Margaret (Emmy) Wydman
COHEN MILSTEIN
SELLERS & TOLL PLLC
1100 New York Avenue, N.W, Suite 800
Washington, DC 20005
Telephone: (202) 408-4600
stoll@cohenmilstein.com
mbowen@cohenmilstein.com
ewydman@cohenmilstein.com

Richard Speirs
Amy Miller
COHEN MILSTEIN
SELLERS & TOLL, PLLC
88 Pine Street, 14th Floor
New York, NY 10005
Telephone: (212) 838-7797
rspeirs@cohenmilstein.com
amiller@cohenmilstein.com

/s/ Justin O. Reliford

Justin O. Reliford
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
222 Delaware Avenue, Suite 1050
Wilmington, DE 19801
Telephone: (302) 578-7345
jreliford@scott-scott.com

Respectfully submitted,

/s/ Mark Filip

Mark Filip
Brenton A. Rogers
KIRKLAND & ELLIS LLP
333 West Wolf Point Plaza Chicago, Illinois
60654
(312) 862-2000
Mark.Filip@kirkland.com
BRogers@kirkland.com

James P. Gillespie
Erin E. Cady
Kirkland & Ellis LLP
1301 Pennsylvania Ave., N.W.
Washington, D.C. 20004
(202) 389-5000
James.Gillespie@kirkland.com
Erin.Cady@kirkland.com

Counsel for Defendants

/s/ Sean Berkowitz

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

Counsel for Nominal Defendant

Maxwell R. Huffman
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: (619) 233-4565
Facsimile: (619) 233-0508
mhuffman@scott-scott.com

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

Jing-Li Yu
Melissa May
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
The Helmsley Building
230 Park Avenue, 17th Floor
New York, New York 10169
Telephone: (212) 223-6444
Facsimile: (212) 223-6334
jyu@scott-scott.com
mmay@scott-scott.com

Co-Lead Counsel for Plaintiffs

John A. Kehoe
KEHOE LAW FIRM, P.C.
1500 JFK Boulevard, Suite 1020
Philadelphia, PA 19102
Tel: 215-792-6676
jkehoe@kehoelawfirm.com

Additional Counsel for Plaintiff SEPTA