

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LEON MARTIN, Derivatively on Behalf of	)	
Nominal Defendant ABBOTT	)	Case No. 1:22-cv-05513
LABORATORIES,	)	
	)	Hon. Manish S. Shah
Plaintiff,	)	
v.	)	
	)	
ROBERT B. FORD, ROBERT J. ALPERN,	)	
M.D., SALLY E. BLOUNT, PH.D.,	)	
PAOLAGONZALEZ, MICHELLE A.	)	
KUMBIER, DARREN W. MCDEW,	)	
NANCYMCKINSTRY, WILLIAM A.	)	
OSBORN, MICHAEL F. ROMAN, DANIEL	)	
J. STARKS, JOHN G. STRATTON, GLENN	)	
F. TILTON, ROBERT E. FUNCK, JOSEPH	)	
MANNING, and CHRISTOPHER J.	)	
CALAMARI,	)	
	)	
Defendants,	)	
- and -	)	
	)	
ABBOTT LABORATORIES,	)	
	)	
Nominal Defendant.	)	

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ILENE LIPPMAN, Derivatively on Behalf of	)	
ABBOTT LABORATORIES,	)	Case No. 1:23-cv-00266
	)	
Plaintiff,	)	Hon. Manish S. Shah
v.	)	
	)	
ROBERT B. FORD, ROBERT J. ALPERN,	)	
SALLY E. BLOUNT, PAOLA GONZALEZ,	)	
MICHELLE A. KUMBIER, DARREN W.	)	
McDEW, NANCY McKINSTRY,	)	
WILLIAM A. OSBORN, MICHAEL F.	)	
ROMAN, DANIEL J. STARKS, JOHN D.	)	
STRATTON, GLENN F. TILTON, ROGER	)	
BIRD, CHRISTOPHER J. CALAMARI,	)	
ROBERT E. FUNCK, JR., JOSEPH	)	
MANNING, and DANIEL SALVADORI,	)	
	)	
Defendants,	)	
- and -	)	
	)	
ABBOTT LABORATORIES,	)	
	)	
Nominal Defendant.	)	

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MATTHEW STEELE, Derivatively on Behalf)	
of ABBOTT LABORATORIES,)	Case No. 1:23-cv-00850
)	
Plaintiff,)	Hon. Manish S. Shah
v.)	
)	
LORI J. RANDALL, KEENAN S. GALE, TJ)	
HATHAWAY, ROBERT J. ALPERN, M.D.,)	
ROXANNE S. AUSTIN, SALLY E.)	
BLOUNT, PH.D., PAOLA GONZALEZ,)	
MICHELLE A. KUMBIER, DARREN W.)	
McDEW, ROBERT B. FORD, NANCY)	
McKINSTRY, WILLIAM A. OSBORN,)	
MICHAEL F. ROMAN, DANIEL J.)	
STARKS, JOHN G. STRATTON, GLENN)	
F. TILTON, ROBERT E. FUNCK, JR.,)	
JOSEPH MANNING, and CHRISTOPHER)	
J. CALAMARI,)	
)	
Defendants,)	
- and -)	
)	
ABBOTT LABORATORIES,)	
)	
Nominal Defendant.)	

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DAVID HAMILTON, Derivatively on Behalf	)	
of ABBOTT LABORATORIES,	)	Case No. 1:23-cv-02648
	)	
Plaintiff,	)	Hon. Manish S. Shah
v.	)	
	)	
ROBERT B. FORD, ROBERT J. ALPERN,	)	
ROXANNE S. AUSTIN, SALLY E.	)	
BLOUNT, PH.D., PATRICIA PAOLA	)	
GONZALEZ, MICHELLE a. KUMBIER,	)	
EDWARD M. LIDDY, DARREN W.	)	
McDEW, NANCY McKINSTRY, PHEBE	)	
N. NOVAKOVIC, WILLIAM A. OSBORN,	)	
MICHAEL F. ROMAN, SAMUEL C.	)	
SCOTT III, DANIEL J. STARKS, JOHN G.	)	
STRATTON, GLENN F. TILTON, MILES	)	
D. WHITE, ROGER M. BIRD,	)	
CHRISTOPHER J. CALAMARI, ROBERT	)	
E. FUNCK, JR., KEENAN S. GALE, TJ	)	
HATHAWAY, JOSEPH J. MANNING,	)	
LORI J. RANDALL, and DANIEL	)	
SALVADORI,	)	
	)	
Defendants,	)	
- and -	)	
	)	
ABBOTT LABORATORIES,	)	
	)	
Nominal Defendant.	)	

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THOMAS P. DiNAPOLI, COMPTROLLER	)	
OF THE STATE OF NEW YORK, AS	)	Case No. 1:23-cv-04142
ADMINISTRATIVE HEAD OF THE NEW	)	
YORK STATE AND LOCAL	)	Hon. Manish S. Shah
RETIREMENT SYSTEM, AND AS	)	
TRUSTEE OF THE NEW YORK STATE	)	
COMMON RETIREMENT FUND,	)	
Derivatively on Behalf of ABBOTT	)	
LABORATORIES,	)	
	)	
Plaintiff,	)	
v.	)	
	)	
ROBERT B. FORD, ROBERT J. ALPERN,	)	
ROXANNE S. AUSTIN, CLAIRE	)	
BABINEAUX-FONTENOT, SALLY E.	)	
BLOUNT, PAOLA GONZALEZ,	)	
MICHELLE A. KUMBIER, EDWARD	)	
LIDDY, PHEBE N. NOVAKOVIC,	)	
DARREN W. MCDEW, NANCY	)	
MCKINSTRY, WILLIAM A. OSBORN,	)	
MICHAEL F. ROMAN, SAMUEL C.	)	
SCOTT III, DANIEL J. STARKS, JOHN G.	)	
STRATTON, GLENN F. TILTON, MILES	)	
D. WHITE, CHRISTOPHER J.	)	
CALAMARI, ROBERT E. FUNCK, JR., J.	)	
SCOTT HOUSE, JOSEPH MANNING,	)	
LORI J. RANDALL, and DANIEL	)	
SALVADORI,	)	
	)	
Defendants,	)	
- and -	)	
	)	
ABBOTT LABORATORIES,	)	
	)	
Nominal Defendant.	)	

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INTERNATIONAL BROTHERHOOD OF	)	
TEAMSTERS LOCAL NO. 710 PENSION	)	Case No. 1:23-cv-04143
FUND and SOUTHEASTERN	)	
PENNSYLVANIA TRANSPORTATION	)	Hon. Manish S. Shah
AUTHORITY, Derivatively on Behalf of	)	
Nominal Defendant ABBOTT	)	
LABORATORIES,	)	
	)	
	)	
Plaintiffs,	)	
v.	)	
	)	
ROBERT B. FORD, HUBERT ALLEN,	)	
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,	)	
WILLIAM A. OSBORN, MICHAEL F.	)	
ROMAN, DANIEL J. STARKS, JOHN G.	)	
STRATTON, GLENN F. TILTON, MILES	)	
D. WHITE, ERICA BATTAGLIA,	)	
CHRISTOPHER J. CALAMARI, ROBERT	)	
E. FUNCK, JR., JOSEPH MANNING, LORI	)	
J. RANDALL, DANIEL SALVADORI, and	)	
JAMES E. YOUNG,	)	
	)	
	)	
Defendants,	)	
- and -	)	
	)	
ABBOTT LABORATORIES,	)	
	)	
Nominal Defendant.	)	

**NOTICE OF MOTION FOR LEAVE TO FILE UNDER SEAL BY PLAINTIFFS
INTERNATIONAL BROTHERHOOD OF TEAMSTERS LOCAL NO. 710 PENSION
FUND AND SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY**

PLEASE TAKE NOTICE THAT on Wednesday, July 19, 2023 at 9:45 a.m. or as soon thereafter as counsel may be heard, we shall appear before the Honorable Manish S. Shah in Courtroom No. 1919, 219 S. Dearborn Street, Chicago, Illinois and present Plaintiffs International Brotherhood

of Teamsters Local No. 710 Pension Fund's and Southeastern Pennsylvania Transportation Authority's Motion for Leave to File Under Seal their Memorandum of Law in Support of their Motion to Consolidate Related Derivative Actions, Appoint Co-Lead Counsel and Approve Their Selection of Co-Lead Counsel, a copy of which is filed concurrently with this Notice..

Dated: July 14, 2023

Respectfully submitted,

/s/ Geoffrey M. Johnson
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*Additional Counsel for Plaintiff Southeastern
Pennsylvania Transportation Authority*