

**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,)
Plaintiff,)) Hon. Manish S. Shah
v.)
ROBERT B. FORD, ROBERT J. ALPERN,)
M.D., SALLY E. BLOUNT, PH.D.,)
PAOLAGONZALEZ, MICHELLE A.)
KUMBIER, DARREN W. MCDEW,)
NANCYMCINSTRY, 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.)

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

Pursuant to Local Rules 5.8 and 26.2, Plaintiffs International Brotherhood of Teamsters Local No. 710 Pension Fund (“Teamsters 710”) and Southeastern Pennsylvania Transportation Authority (“SEPTA”), by and through undersigned counsel, respectfully move this Court for leave

to file under seal their Response in Further Support of their Motion to Consolidate Related Derivative Actions, Appoint Co-Lead Plaintiffs and Approve Their Selection of Co-Lead Counsel (the “Response”).

In support of this motion, Teamsters 710 and SEPTA state as follows:

1. Teamsters 710 and SEPTA has filed a redacted version of the Response and an unredacted, provisionally sealed version of the Response simultaneously with the filing of this motion (*see* ECF Nos. 80 and 82, respectively).
2. Under Local Rule 26.2(c), “[a]ny party wishing to file a document or portion of a document electronically under seal in connection with a motion, brief or other submission must [.] .] move the court for leave to file the document under seal.”
3. The Response is subject to Confidentiality Agreements entered into between Plaintiff Teamsters 710 and Abbott Laboratories (“Abbott”) dated January 25, 2023, and Plaintiff SEPTA and Abbott dated February 28, 2023. Prior to commencing this action, Teamsters 710 and SEPTA each separately served inspection demands on Abbott pursuant to 805 ILL. COMP. STAT. §5/7.75. After negotiations, Abbott produced certain books and records responsive to the Teamsters 710’s and SEPTA’s individual inspection demands subject to the Confidentiality Agreements referenced above, which require both Plaintiffs to file any complaint or other pleading referencing the confidential material under seal. The Response refers throughout to material subject to the respective Confidentiality Agreements. Teamsters 710 and SEPTA respectfully submit that good cause exists to initially seal the Response because nominal defendant Abbott has designated material as “Confidential” and pursuant to their respective Confidentiality Agreements, Teamsters 710 and SEPTA are required to seek to have their complaint to be filed under seal when they refer to materials Abbott has designated as “Confidential.”

WHEREFORE, for the reasons stated above, Teamsters 710 and SEPTA respectfully request that this Court grant this motion and permit Teamsters 710 and SEPTA to file under seal the Response.

Dated: July 28, 2023

Respectfully submitted,

/s/ Geoffrey M. Johnson
Geoffrey M. Johnson
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
12434 Cedar Road, Suite 12
Cleveland Heights, Ohio 44106
Tel: 216-229-6088
gjohnson@scott-scott.com

/s/ Carol V. Gilden
Carol V. Gilden
COHEN MILSTEIN SELLERS & TOLL,
PLLC
190 South LaSalle Street, Suite 1705
Chicago, Illinois 60603
IL Bar: 6185530
Tel: 312-357-0370
cgilden@cohenmilstein.com

Jing-Li Yu
Tyler C. Yagman
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
The Helmsley Building
230 Park Avenue, 17th Floor
New York, NY 10169
Tel: 212-223-6444
jyu@scott-scott.com
tyagman@scott-scott.com

Richard Speirs
Amy Miller
COHEN MILSTEIN SELLERS & TOLL,
PLLC
88 Pine Street, 14th Floor
New York, NY 10005
Tel: 212 828-7791
rspeirs@cohenmilstein.com
amiller@cohenmilstein.com

Joseph A. Pettigrew
SCOTT+SCOTT
ATTORNEYS AT LAW LLP
600 W. Broadway, Suite 3300
San Diego, CA 92101
Tel: 619-233-4565
jpettigrew@scott-scott.com

Steven J. Toll
COHEN MILSTEIN SELLERS & TOLL,
PLLC
1100 New York Ave., NW
Fifth Floor
Washington, DC 20005
Tel: 202-208-2600
stoll@cohenmilstein.com

Counsel for Plaintiffs

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 Southeastern
Pennsylvania Transportation Authority*