



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

December 31, 2025

Sonia Barros
Sidley Austin LLP

Re: Abbott Laboratories (the "Company")
Incoming Letter dated December 22, 2025

Dear Sonia Barros:

This letter is in response to your correspondence concerning the shareholder proposal (the "Proposal") submitted to the Company by The EGIS Trust and co-filers for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders.

The Company represents that it has a reasonable basis to exclude the Proposal. Based solely on that representation, we will not object if the Company excludes the Proposal from its proxy materials.

Copies of all of the correspondence on which this response is based will be made available on our website.

Sincerely,

Division of Corporation Finance
Office of Chief Counsel

cc: Richard Weiss
As You Sow



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December 22, 2025

Via Online Submission Form

Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, D.C. 20549

Re: Abbott Laboratories - Shareholder Proposal Submitted by The EGIS Trust (S)

Dear Ladies and Gentlemen:

On behalf of Abbott Laboratories, an Illinois corporation (“Abbott” or the “Company”), and pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), we hereby notify the Staff of the Securities and Exchange Commission (the “Commission” or the “SEC”) that Abbott intends to exclude a shareholder proposal received on November 6, 2025 (together with the supporting statement, the “Proposal”) from The EGIS Trust (S) and co-filed by James C Manolis, Lzft Descendants Tr Gst Exempt and Patrick de Freitas Rev Tr (collectively, the “Proponents”) from the proxy materials for Abbott’s 2026 annual shareholders’ meeting (the “2026 Proxy Materials”) on the basis of Exchange Act Rule 14a-8(i)(7) because the Proposal deals with matters relating to Abbott’s ordinary business operations and seeks to micromanage the Company. Abbott expects to file the 2026 Proxy Materials in definitive form with the SEC on or about March 13, 2026.

This notice is being submitted electronically in accordance with Staff Legal Bulletin No. 14D (Nov. 7, 2008). Pursuant to the Division’s Statement Regarding the Division of Corporation Finance’s Role in the Exchange Act Rule 14a-8 Process for the Current Proxy Season issued on November 17, 2025 (the “Division Statement”), Abbott represents without qualification that it has a reasonable basis to exclude the Proposal based on the provisions of Rule 14a-8, prior published guidance and/or judicial decisions, for the reasons set forth in this notice. On behalf of Abbott, we request that the Division respond to this notice that it will not object to the omission of the Proposal from the 2026 Proxy Materials, in accordance with the Division Statement.

THE PROPOSAL

A full copy of the Proposal is attached hereto as Exhibit A. The Proposal requests that the Company's shareholders approve the following resolution:

RESOLVED: Shareholders request that Abbott Laboratories issue a report, at reasonable expense and omitting proprietary information, analyzing the supply chain risks of horseshoe crab materials and whether synthetic endotoxin testing alternatives would reduce material risk to the Company.

BASES FOR EXCLUSION

I. **The Proposal May Be Excluded Pursuant to Rule 14a-8(i)(7) Because It Deals with Matters Relating to the Company's Ordinary Business Operations**

Rule 14a-8(i)(7) permits a company to omit from its proxy materials a shareholder proposal that "deals with a matter relating to the company's ordinary business operations." According to the Commission's release accompanying the 1998 amendments to Rule 14a-8, the term "ordinary business" "refers to matters that are not necessarily 'ordinary' in the common meaning of the word," but instead "is rooted in the corporate law concept [of] providing management with flexibility in directing certain core matters involving the company's business and operations." Exchange Act Release No. 40018 (May 21, 1998) (the "1998 Release"). The 1998 Release further explains that the underlying policy of the exclusion is "to confine the resolution of ordinary business problems to management and the board of directors, since it is impracticable for shareholders to decide how to solve such problems at an annual shareholders meeting," and identifies two central considerations. The first is that "[c]ertain tasks are so fundamental to management's ability to run a company on a day-to-day basis that they could not, as a practical matter, be subject to direct shareholder oversight." *Id.* The second concerns "the degree to which the proposal seeks to 'micro-manage' the company by probing too deeply into matters of a complex nature upon which shareholders, as a group, would not be in a position to make an informed judgment." *Id.* (citing Exchange Act Release No. 12999 (Nov. 22, 1976)).

The Commission has also clarified that a proposal framed as a request for a report is not insulated from exclusion where the underlying subject concerns ordinary business. The Exchange Act Release No. 20091 (Aug. 16, 1983) (the "1983 Release") explains that the Staff will look to the subject matter of the requested report rather than its form. Consistent with that guidance, Staff Legal Bulletin No. 14E ("SLB 14E") states that when a proposal involves the evaluation of risk, the Staff will consider whether the underlying operational subject giving rise to the risk is an ordinary business matter and, where it is, exclusion under Rule 14a-8(i)(7) is appropriate.

The Proposal concerns core operational decisions, including sourcing of testing materials, supplier qualification, and the selection, validation, and regulatory approval of scientific testing methodologies. As the precedents below demonstrate, proposals that seek to influence operational technologies, internal manufacturing and quality-control systems, or supply-chain management fall within the ordinary business exclusion.

A. The Proposal Addresses Core Operational Matters That Are Fundamental to Management’s Day-to-Day Responsibilities

The Proposal asks Abbott to prepare a report “analyzing the supply chain risks of horseshoe crab materials and whether synthetic endotoxin testing alternatives would reduce material risk to the Company.” The Commission has long held that proposals requesting a report or assessment of risks are evaluated by the Staff by considering the underlying subject matter of the proposal when applying Rule 14a-8(i)(7). See the 1983 Release; see also SLB 14E. The underlying purpose of the report sought by the Proposal is a commitment to replace its existing endotoxin-testing methodology with synthetic alternatives. Abbott’s selection and use of technology and manufacturing and quality-control processes are core operational functions. Decisions concerning the selection of biological testing methods, the qualification of alternative inputs, and the design and maintenance of quality-control systems require extensive scientific, technical, regulatory, and logistical analysis. These activities are embedded in Abbott’s daily operations and fall squarely within management’s ordinary-course responsibilities.

The Proposal is Excludable Because it Concerns the Selection and Use of Technology, Which is an Ordinary Business Matter

Decisions concerning operational technologies require technical and regulatory expertise and are fundamental to management’s responsibility for day-to-day operations. The Staff has consistently permitted exclusion of proposals seeking to influence the technologies employed in company operations under Rule 14a-8(i)(7). In *PG&E Corp.* (Mar. 10, 2014), the Staff permitted exclusion of a proposal requesting evaluation of analog and smart meters, which PG&E explained involved engineering and operational judgments about its metering infrastructure. In *FirstEnergy Corp.* (Mar. 8, 2013), the Staff permitted exclusion of a proposal seeking changes to energy-generation technologies, which FirstEnergy stated required complex engineering and operational assessments. In *AT&T Inc.* (Feb. 13, 2012), the Staff permitted exclusion of a proposal addressing continued use of equipment described as inefficient; AT&T noted that decisions to maintain or replace operational equipment required technical judgment within routine network management. Similarly, in *CSX Corp.* (Jan. 24, 2011), the Staff permitted exclusion of a proposal seeking changes to rail technology, which CSX explained reflected engineering considerations essential to its daily operations.

The Proposal asks the Company to evaluate and potentially replace its existing endotoxin-testing methodology with synthetic alternatives. Such decisions require scientific validation, performance assessments, regulatory-compliance analysis, and integration into complex operational systems, as well as consideration of product-specific risk profiles and the interaction of testing methods with manufacturing processes. As in *PG&E*, *FirstEnergy*, *AT&T*, and *CSX*, these determinations concern the selection and use of technology in the Company's operations and are ordinary business matters.

The Proposal is Excludable Because it Concerns Manufacturing Processes and Quality-Control Systems, Which is an Ordinary Business Matter

The Staff has consistently concluded that proposals addressing a company's internal manufacturing processes, product formulation, and quality-control systems concern ordinary business operations. Decisions involving product composition, scientific testing methodologies, and compliance with technical and regulatory standards require specialized scientific, engineering, and operational expertise. These determinations cannot be directed by shareholders without intruding upon day-to-day management. In *Tesla Inc.* (May 6, 2025) ("Tesla 1"), the Staff permitted exclusion of a proposal requesting that the company commit to implementing a sustainable tire solution; Tesla explained that the request concerned decisions about vehicle-component design and the materials used in tires. In *Pfizer Inc.* (Mar. 1, 2016), the Staff permitted exclusion of a proposal seeking a report regarding controls on the sale and distribution of certain medicines, which Pfizer stated addressed operational systems involving managerial and regulatory processes. The Staff reached the same result in *Ball Corporation* (Feb. 4, 2016), where the proposal requested a report on policies and plans to reduce BPA use in products and Ball explained that the subject involved decisions about chemical substances used in packaging and the consideration of alternative coatings. Similarly, in *DENTSPLY International Inc.* (Mar. 21, 2013), the Staff permitted exclusion of a proposal requesting a report on plans to phase out mercury from dental products; DENTSPLY stated that the proposal concerned decisions about the composition of restorative materials and potential substitutes. In *FMC Corp.* (Feb. 25, 2011; *recon. denied* Mar. 16, 2011), the Staff permitted exclusion of a proposal seeking changes to the company's sale of certain pesticides, which FMC explained involved day-to-day judgments about products offered for sale.

These precedents confirm that proposals seeking to influence core scientific or operational determinations are excludable when they attempt to direct how a company designs, formulates, tests, or validates its products or raw materials. Here, the Proposal concerns the Company's quality-control testing processes and the potential adoption of an alternative scientific methodology. Decisions regarding endotoxin-testing methods require scientific validation, laboratory performance assessments, regulatory review, risk analysis, and integration with complex manufacturing and quality systems, as well as evaluation of interactions between testing methods and product characteristics, qualification of alternative materials, and maintenance of compliance frameworks. As in *Tesla 1*, *Pfizer*, *Ball*,

DENTSPLY, and *FMC*, these judgments are operational matters entrusted to management and therefore fall squarely within the scope of Rule 14a-8(i)(7).

B. The Proposal Does Not Focus On Any Significant Policy Issue That Transcends Abbott's Ordinary Business Operations.

The ordinary-business exclusion continues to apply even where a proposal touches on a subject that could be characterized as having a public-policy dimension. As the Commission stated in the 1998 Release, the relevant inquiry is whether the proposal's primary focus concerns ordinary business operations. If the thrust of the proposal is directed at day-to-day operational decisions, the presence of a broader theme does not preclude exclusion.

The Staff has consistently applied this principle with respect to proposals touching upon environmental or sustainability issues. For example, in *Tesla 1*, although the supporting statement referred to environmental and human-health concerns related to tire wear, 6PPD-Q, and microplastics, the Staff permitted exclusion of the proposal under Rule 14a-8(i)(7) where Tesla explained that the proposal focused on product design and sourcing decisions. In *Ball*, references to environmental and public-health risks associated with BPA did not prevent exclusion because Ball stated that the proposal concerned its product-development and materials-selection determinations. In *DENTSPLY*, the Staff permitted exclusion of a proposal invoking mercury pollution and health concerns where *DENTSPLY* explained that the requested action centered on decisions regarding the composition of dental materials and potential substitutes.

More recent no-action letters reflect the same principle. In *Delta Air Lines, Inc.* (Apr. 23, 2025), the Staff permitted exclusion of a proposal requesting a report on the feasibility and benefits of offering only plant-based special meals. Delta stated that the proposal concerned decisions about the types of food served on its flights. The Staff permitted exclusion on the same basis in *American Airlines Group, Inc.* (Apr. 15, 2025) and *United Airlines Holdings, Inc.* (Apr. 9, 2025). In *McDonald's Corporation* (Mar. 28, 2025), the Staff permitted exclusion of a proposal requesting a food-waste transparency report; McDonald's explained that the proposal implicated its restaurant operations, inventory practices, and waste-handling processes. In *Wyndham Hotels & Resorts, Inc.* (Mar. 26, 2025), the Staff permitted exclusion of a proposal requesting disclosures concerning the company's Wyndham Green certification program, where Wyndham stated that the request concerned its internal disclosure practices and information about the performance of franchised hotels.¹

¹ See also *AbbVie Inc.* (Mar. 16, 2017) (Staff permitted exclusion of a proposal requesting a report on the safe disposition of prescription drugs and evaluating drug take-back programs); *Johnson & Johnson* (Jan. 30, 2017) (same); and *General Electric Co.* (Feb. 3, 2016) (Staff permitted exclusion of a proposal requesting an independent evaluation and report on potential liability from PCB discharges in the Hudson River).

Here, although the Proposal's supporting statement discusses environmental concerns for the Atlantic coastal ecosystem due to a declining horseshoe crab population, its primary focus remains on Abbott's ordinary business matters, namely its operational processes: supply-chain management, sourcing and validation of testing materials, and the selection and use of scientific and analytical methodologies in Abbott's manufacturing and quality-control systems. The Proposal does not present a significant social policy issue that is specifically and directly tied to Abbott's business, but instead seeks to involve shareholders in the mechanics of how Abbott conducts testing for its product[s]. The Proposal therefore falls within the scope of the ordinary-business exclusion under Rule 14a-8(i)(7).

II. The Proposal May Be Excluded Pursuant to Rule 14a-8(i)(7) Because It Seeks to Micromanage Abbott

Under Staff Legal Bulletin No. 14K ("SLB 14K"), which the Staff reinstated in Staff Legal Bulletin No. 14M, "[w]hen a proposal prescribes specific actions that the company's management or the board must undertake without affording them sufficient flexibility or discretion in addressing the complex matter presented by the proposal, the proposal may micromanage the company to such a degree that exclusion of the proposal would be warranted." Under SLB 14K, the Staff has stated that proposals may warrant different outcomes under the "micromanagement" analysis, even when they focus on the same subject matter, "based solely on the level of prescriptiveness with which the proposals approach that subject matter." As an example, SLB 14K references a proposal that prescribes a specific method for reducing greenhouse emissions, noting that the proposal was excludable on the basis of "micromanagement" because it "effectively requir[es] the adoption of time-bound targets (short, medium and long) that the company would measure itself against and changes in operations to meet those goals, thereby imposing a specific method for implementing a complex policy." SLB 14K contrasts this proposal with one seeking a report "describing if, and how, [a company] plans to reduce its total contribution to climate change and align its operations and investments with the Paris [Climate] Agreement's goal of maintaining global temperatures well below 2 degrees Celsius." The Staff concluded that this proposal "did not seek to micromanage the company because it deferred to management's discretion to consider if and how the company plans to reduce its carbon footprint and asked the company to consider the relative benefits and drawbacks of several actions."

The Proposal here, although styled as a request for a report, directs Abbott to analyze "the supply chain risks of horseshoe crab materials" and evaluate "whether synthetic endotoxin testing alternatives would reduce material risk to the Company." In the context of Abbott's operations, conducting such an analysis necessarily requires a detailed assessment of whether Abbott should replace an existing, validated endotoxin-testing methodology with identified synthetic alternatives. That assessment is not a high-level policy review but instead involves technical inquiries into method performance, laboratory validation requirements, regulatory considerations, supplier capabilities, and the interaction of any alternative testing materials

with Abbott's manufacturing and quality-control systems. SLB 14K makes clear that proposals requiring management to undertake these types of structured, method-specific evaluations constitute micromanagement because they limit management's flexibility in addressing complex operational matters.

Recent Staff decisions illustrate how this principle has been applied. In *Mondelez International, Inc.* (Mar. 25, 2025), the Staff permitted exclusion of a proposal requesting adoption of a No Deforestation, No Peatland, No Exploitation policy; Mondelez stated that the proposal would direct decisions about supplier standards and sourcing across multiple commodity chains that it manages in the ordinary course. In *Tesla Inc.* (May 2, 2025), the Staff permitted exclusion of a proposal requesting a moratorium on sourcing minerals derived from deep-sea mining, which Tesla explained would impose a categorical sourcing restriction and limit its ability to consider operational, regulatory, and technological factors relevant to procurement. In *Tesla Inc.* (Mar. 27, 2024), the Staff permitted exclusion of a proposal calling for the redesign of vehicle tires to address pollution concerns, which Tesla stated implicated product-design and engineering decisions. In *The Home Depot Inc.* (Mar. 21, 2024), the Staff permitted exclusion of a proposal requesting an assessment of a commitment not to sell paint containing titanium dioxide sourced from a specific region. Home Depot explained that the requested assessment concerned supplier relationships and sourcing decisions made in the ordinary course. In *The Chemours Company* (Feb. 22, 2024), the Staff permitted exclusion of a proposal requesting an evaluation of a commitment not to mine or purchase titanium from a particular region, which Chemours stated involved operational and regulatory considerations associated with production and sourcing. The Staff likewise permitted exclusion in *The Kroger Co.* (Apr. 25, 2023), where the proposal requested that the company participate in a specific supply-chain certification program; Kroger explained that the request would affect vendor-selection practices and sourcing processes involving judgments about operational feasibility and supplier capabilities. These decisions reflect a consistent principle: proposals that would require companies to engage in detailed operational or technical analyses, or that seek to direct how companies evaluate or implement specific methods or sourcing strategies, constitute micromanagement under Rule 14a-8(i)(7).

Under SLB 14K, a company asserting micromanagement is also expected to explain how a proposal would limit management's ability to manage complex matters in a manner consistent with its fiduciary duties. As discussed earlier in Section II, decisions regarding Abbott's sourcing of horseshoe crab-derived materials and the selection, validation, and use of endotoxin-testing methodologies involve scientific, regulatory, and operational considerations that must be evaluated by personnel with specialized expertise. These decisions require ongoing assessments of manufacturing requirements, test-method performance, supplier reliability, regulatory requirements, and quality-system integration. They are fundamental to Abbott's day-to-day operations.

The Proposal would constrain management's ability to address these matters with the necessary flexibility. By directing Abbott to conduct a specific analysis of synthetic endotoxin-testing alternatives and evaluate whether such alternatives would reduce risk, the Proposal compels a detailed inquiry into whether Abbott should transition its testing methodology. SLB 14K describes this type of directed, technical evaluation as potentially micromanaging because it imposes an analytical framework determined by the Proponents rather than allowing Abbott's management to determine when and how such evaluations should occur. These determinations involve laboratory validation, review of regulatory requirements, evaluation of supplier capabilities, and decisions about integrating methodologies into regulated quality-control systems. By seeking to influence these decisions, the Proposal would place shareholders in the position of second-guessing operational judgments made by Abbott's scientific, regulatory, and manufacturing personnel.

As reflected in the Staff's precedents, proposals requiring shareholder involvement in evaluating or influencing complex operational or sourcing decisions dependent on specialized knowledge have been excluded under Rule 14a-8(i)(7). The Proposal here exhibits these same features because it seeks shareholder involvement in evaluating a technical methodology used in Abbott's operations and in considerations related to potential changes to a regulated quality-control process. Because the Proposal would involve shareholders in matters requiring scientific, regulatory, and operational judgment and would limit management's flexibility to manage testing methodologies and sourcing strategies, the Proposal is excludable under Rule 14a-8(i)(7) as micromanagement.

CONCLUSION

For the foregoing reasons, on behalf of Abbott, we request that the Division respond to this notice that it will not object to the omission of the Proposal from the 2026 Proxy Materials, in accordance with the Division Statement.

If the Staff has any questions or would like additional information, please contact me at 202-736-8387 or sbarros@sidley.com.

Sincerely yours,

/s/ Sonia Barros
Sonia Barros

Enclosure: Exhibit

cc: As You Sow
The EGIS Trust (S)

Exhibit A

Proposal

See attached.

WHEREAS: Pharmaceutical and medical device companies conduct tests to detect bacterial contamination in injectable drugs, vaccines, and medical devices. While the industry historically relied on blood extracted from horseshoe crabs to conduct such tests, approved and readily available synthetic alternatives are now available. Abbott continues using horseshoe crab blood despite pressure on a keystone species whose eggs provide critical food for at least 11 species of migratory shorebirds and fish species.¹ A decline in horseshoe crabs threatens the entire Atlantic coastal ecosystem. For example, the red knot shorebird population has plummeted 75% since the 1980s,² from approximately 50,000 to 13,000 birds, due to horseshoe crab egg depletion.³

Declining Crab Population

The biomedical industry harvests blood from millions of horseshoe crabs annually, with mortality rates of 15 - 30%.⁴ Population declines, tightening harvest regulations, and ongoing environmental litigation are compounding supply-chain vulnerability and elevating regulatory and reputational exposure for companies dependent on this input.^{5,6}

Synthetic Testing Is Now a Cost-Effective and Feasible Replacement

Synthetic alternatives offer more reliable and cost-effective testing for contamination.⁷ They avoid quality and supply issues tied to horseshoe crab blood and deliver more consistent results.⁸ With new U.S. Pharmacopeia standards taking effect in May 2025, these synthetic alternatives are now fully recognized by regulators – removing the primary adoption barrier.⁹

Abbott is Falling Behind Industry Leaders and Its Competitors

Industry leaders including Eli Lilly (which secured FDA approval for recombinant Factor C-tested drugs in 2018), GSK, Amgen, and Sanofi have adopted synthetic contamination testing, citing reduced costs, quality improvements, and enhanced supply chain security.^{10,11}

Failure to Transition Amid Tightening Regulations and Reduced Supply Poses Material and Reputational Risk

State legislatures are increasingly restricting horseshoe crab harvesting. In 2025, New York banned both commercial and biomedical collection, and similar measures are underway in Connecticut and New

¹ <https://www.horseshoecrab.org/nh/eco.html>

² <https://www.usgs.gov/publications/effects-horseshoe-crab-harvest-delaware-bay-red-knots-are-harvest-restrictions-working>

³ <https://www.usgs.gov/publications/red-knot-stopover-population-size-and-migration-ecology-delaware-bay-usa-2021>

⁴ <https://why.org/articles/delaware-bay-female-horseshoe-crabs-spared-commercial-harvest-2023/>

⁵ <https://www.mass.gov/news/regulatory-updates-2024-q1-and-q2>

⁶ <https://biologicaldiversity.org/w/news/press-releases/maryland-court-orders-release-of-hidden-horseshoe-crab-mortality-data-2025-03-20/>

⁷ <https://pmc.ncbi.nlm.nih.gov/articles/PMC6200278/>

⁸ <https://pmc.ncbi.nlm.nih.gov/articles/PMC6200278/>

⁹ <https://www.mbl.edu/news/us-pharmacopeia-oks-synthetic-alternatives-horseshoe-crab-blood>

¹⁰ <https://reviverestore.org/eli-lilly-sets-the-gold-standard-for-sustainable-endotoxin-testing/>

¹¹ <https://pharmascore.org/>

Jersey.¹² New regulations are tightening the already limited supply of horseshoe crab blood. Abbott's continued reliance on horseshoe crab blood exposes the Company to escalating supply, regulatory and reputational risks. Abbott's 10-K highlights that such disruptions can result in "increased costs, lost revenue, [and] damage to customer relations."¹³

Without disclosure on testing methods or a strategy to adopt synthetic alternatives, shareholders cannot assess Abbott's exposure to regulatory tightening, supply instability, or rising costs. Greater transparency is needed to evaluate how the Company is safeguarding operational continuity and investor returns.

RESOLVED: Shareholders request that Abbott Laboratories issue a report, at reasonable expense and omitting proprietary information, analyzing the supply chain risks of horseshoe crab materials and whether synthetic endotoxin testing alternatives would reduce material risk to the Company.

¹² <https://www.nysenate.gov/legislation/bills/2025/S4289> ; https://portal.ct.gov/governor/news/press-releases/2023/08-2023/governor-lamont-signs-legislation-banning-the-harvesting-of-horseshoe-crabs?language=en_US ; <https://www.littoralsociety.org/protect-horseshoe-crabs.html>

¹³ <https://www.abbottinvestor.com/static-files/2b75fde0-1c65-4b0e-b0b6-ea78d31cb652>



Abbott - As You Sow Notice of Intent to Reply

From Richard Weiss <[REDACTED]>
Date Mon 12/22/2025 6:00 PM
To ShareholderProposals <shareholderproposals@sec.gov>
Cc Shareholder Engagement <shareholderengagement@asyousow.org>; Danielle Fugere <[REDACTED]>; cduque@sidley.com <cduque@sidley.com>; jessica.paik@abbott.com <jessica.paik@abbott.com>; aaron.rice@abbott.com <aaron.rice@abbott.com>; sbarros@sidley.com <sbarros@sidley.com>

Good Afternoon,

As You Sow represents The EGIS Trust (S) and co-filers James C Manolis, Lzft Descendants Tr Gst Exempt and Patrick de Freitas Rev Tr, the proponents of a shareholder proposal submitted to Abbott Laboratories. *As You Sow* is in receipt of a notice of intent to exclude to the SEC dated December 22, 2025. *As You Sow* intends to respond on behalf of the proponents by January 12, 2025, and respectfully requests the Staff delay issuing a response until after that time.

The Company and its counsel are CCed here. Thank you.

Richard Weiss
Senior Counsel
As You Sow

www.asyousow.org



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