CIVIL COVER SHEET

JS-44 (Rev. 11/2020 DC)											
I. (a) PLAINTIFFS				DEFENDA	NTS						
AbbVie Inc., 1 North Waukegan Road North Chicago, IL 60064				Internal Revenue Service 1111 Constitution Avenue, N.W. Washington, D.C. 20224							
(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF (EXCEPT IN U.S. PLAINTIFF CASES)				COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT 11001 (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED							
(c) ATTORNEYS (FIRM NA		ATTORNEYS (IF KNOWN)									
George M. Clarke III Baker & McKenzie LLP 815 Connecticut Avenue, N.W. Washington, D.C. 20006 (202) 835-6184											
II. BASIS OF JURISDICTION (PLACE AN X IN ONE BOX ONLY)			III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY!								
0 1 U.S. Government Plaintiff		deral Question S. Government Not a Party)	Citizen of th	his State	PTF O 1	DFT O 1		ated or Principal Place ess in This State	PTF O 4	DFT O 4	
2 U.S. Government Defendant	(Ir	versity dicate Citizenship of	Citizen of A	another State	O 2	O 2	Incorpor	ated and Principal Place	O 5	O ⁵	
	Pa	rties in item III)	Citizen or S Foreign Co		O 3	O 3	Foreign 1		O 6	O 6	
IV. CASE ASSIGNMENT AND NATURE OF SUIT (Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)											
	-	· · · · · · · · ·								An aireiter a	
O A. Antitrust		Personal Injury/ Ialpractice	0	O C. Administrative Agency Review				O D. Temporary Restraining Order/Preliminary Injunction			
410 Antitrust	310 Ai	irplane		151 Medicare	Act			Injunctio	<i>, , , , , , , , , ,</i>		
		rplane Product Liability	Social Security				Any nature of suit from any category				
		ssault, Libel & Slander		<u>1 Security</u> 861 HIA (1395	may be selected for this category of case assignment. *(If Antitrust, then A governs)*						
		ederal Employers Liability		862 Black Lung (923) 863 DIWC/DIWW (405(g))							
	340 M										
	345 Marine Product Liability 350 Motor Vehicle			864 SSID Title	(II And usi, then A	a governs	5)				
				865 RSI (405(g))						
		otor Vehicle Product Liabili ther Personal Injury	LV	Other Statutes							
	360 Other Personal Injury 362 Medical Malpractice			891 Agricultural Acts							
		oduct Liability		893 Environm							
		ealth Care/Pharmaceutical	؛ ل ا	890 Other Sta	(
		ersonal Injury Product Liabi	lity	Administr							
	368 Asbestos Product Liabili			Involved)							
O E. General Civ	il (Other)	OR	() F. Pro	Se Ger	ieral C	ïvil	I			
Real Property		Bankruptcy	_	Federal'							
210 Land Condemn	ation	422 Appeal 27 USC 15		870	870 Taxes (US plaintiff or			465 Other Immigration Actions			
220 Foreclosure	Figetment	423 Withdrawal 28 US	50 157	C 157 defendant) 871 IRS-Third Party 26 USC			470 Racketeer Influenced				
230 Rent, Lease & I 240 Torts to Land	sjecunent	Prisoner Petitions		7609			& Corrupt Organization				
240 Torts to Land 245 Tort Product L	iability	535 Death Penalty					480 Consumer Credit 485 Telephone Consumer				
290 All Other Real	•	540 Mandamus & Otl	her	Forfeiture/Penalty			Protection Act (TCPA)				
		550 Civil Rights		625 Drug Related Seizure of Property 21 USC 881			490 Cable/Satellite TV				
Personal Property				690 Other			850 Securities/Commodities/				
370 Other Fraud 371 Twith in Londing			onditions	ditions			Exchange				
371 Truth in Lending of Confinement 380 Other Personal Property				Other Statutes			896 Arbitration				
Damage <u>Property Rights</u>				375 False Claims Act			899 Administrative Procedure				
385 Property Damage		820 Copyrights		376 Qui Tam (31 USC			Act/Review or Appeal of				
Product Liability		830 Patent		3729(a))			Agency Decision 950 Constitutionality of State				
-		835 Patent – Abbreviated New		400 State Reapportionment 430 Banks & Banking			Statutes				
		Drug Application		430 Banks & Banking 450 Commerce/ICC Rates/etc			Statutes 890 Other Statutory Actions				
		- U U					-		utory Act	tions	
		840 Trademark		450		ce/ICC	-	890 Other Stat	•		
		- U U		450 460	Commer	ce/ICC ion	-		inistrativ	e agency	

O G. Habeas Corpus/ 2255	O H. Employment Discrimination	• I. FOIA/Privacy Act	O J. Student Loan						
530 Habeas Corpus – General 510 Motion/Vacate Sentence 463 Habeas Corpus – Alien Detainee	442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation)	X 895 Freedom of Information Act 890 Other Statutory Actions (if Privacy Act)	152 Recovery of Defaulted Student Loan (excluding veterans)						
	(If pro se, select this deck)	*(If pro se, select this deck)*							
 K. Labor/ERISA (non-employment) 710 Fair Labor Standards Act 720 Labor/Mgmt. Relations 740 Labor Railway Act 751 Family and Medical Leave Act 790 Other Labor Litigation 791 Empl. Ret. Inc. Security Act 	 L. Other Civil Rights (non-employment) 441 Voting (if not Voting Rights Act) 443 Housing/Accommodations 440 Other Civil Rights 445 Americans w/Disabilities – Employment 446 Americans w/Disabilities – Other 448 Education 	 M. Contract 110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 153 Recovery of Overpayment of Veteran's Benefits 160 Stockholder's Suits 190 Other Contracts 195 Contract Product Liability 196 Franchise 	 N. Three-Judge Court 441 Civil Rights – Voting (if Voting Rights Act) 						
V. ORIGIN									
O 1 Original Proceeding O 2 Removed from State Court O 3 Remanded from Appellate Court O 4 Reinstated or Reopened Court O 5 Transferred from another district (specify) O 6 Multi-district Litigation O 7 Appeal to District Judge O 8 Multi-district Litigation – Direct File									
VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.) AbbVie brings action against the IRS to compel compliance with 5. U.S.C. section 552, et seq.									
VII. REQUESTED IN COMPLAINT CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P.23 DEMAND \$ Check YES only if demanded in complaint YES Check YES only if demanded in complaint YES									
VIII. RELATED CASE(S) (See instruction) YES NO X If yes, please complete related case form IF ANY									
DATE: March 3, 2023 SIGNATURE OF ATTORNEY OF RECORD /s/ George M. Clarke, III									

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff ir resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed <u>only</u> if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the <u>primary</u> cause of action found in your complaint. You may select only <u>one</u> category. You <u>must</u> also select <u>one</u> corresponding nature of suit found under the category of the case.
- VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.