

EXHIBIT C

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December 21, 2023

VIA ELECTRONIC MAIL

Altice USA, Inc.
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Re: *Dale v. Deutsche Telekom AG*, Case No. 1:22-cv-03189 (N.D. Ill.)

Dear Counsel:

We represent Defendant T-Mobile US, Inc. (“T-Mobile”) in the above-captioned litigation. In that litigation, Plaintiffs have served requests for production on T-Mobile seeking trial testimony, trial exhibits, and certain discovery (deposition transcripts and exhibits) from *State of New York v. Deutsche Telekom AG*, Case No. 19-cv-05434 (S.D.N.Y.) (“State AG Case”). Certain of those requests implicate the Confidential and/or Highly Confidential Material of Altice USA, Inc. (“Altice”), AT&T Inc. (“AT&T”), Comcast Corp. (“Comcast”), Deutsche Telekom AG (“Deutsche Telekom”), DISH Network Corp. (“DISH”), Google, LLC (“Google”), Softbank Group Corp. (“Softbank”), Verizon Communications Inc. (“Verizon”), and the plaintiffs in the State AG Case. Accordingly, we write to provide you with notice of Plaintiffs’ requests, pursuant to the Amended Interim Protective Order entered in the State AG Case on August 14, 2019 (Dkt. 185).

Plaintiffs’ counsel have been copied on this correspondence. Please let both parties know in writing if Altice, AT&T, Comcast, Deutsche Telekom, DISH, Google, Softbank, Verizon, and/or the plaintiffs in the State AG Case consent to the production of the requested materials, to the extent they are in T-Mobile’s possession. We understand that Plaintiffs intend to move to compel T-Mobile to produce such information on January 17, 2024; the parties have agreed that any brief in opposition shall be due three (3) weeks later, on February 7, 2024, to allow third-parties like Altice, AT&T, Comcast, Deutsche Telekom, DISH, Google, Softbank, Verizon, and the plaintiffs in the State AG Case time to respond. Please be aware that T-Mobile does not intend to take a position in response to Plaintiffs’ motion.

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Sincerely,

/s/ Rachel S. Brass

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