

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY DALE, BRETT JACKSON,
JOHNNA FOX, BENJAMIN
BORROWMAN, ANN LAMBERT,
ROBERT ANDERSON, and CHAD
HOHENBERY on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

DEUTSCHE TELEKOM AG, and T-
MOBILE US, INC.,

Defendants.

Case No. 1:22-cv-03189

Hon. Thomas M. Durkin

Hon. Jeffrey Cole

**STIPULATED MOTION REGARDING SUBSTANTIAL COMPLETION DEADLINE FOR
DATA PRODUCTIONS AND TO AMEND SCHEDULE**

Plaintiffs and Defendant T-Mobile US, Inc. (“T-Mobile” and, together, “the parties”) by and through their respective counsel, hereby submit this stipulated motion to (a) set a December 16, 2024 deadline for substantial completion of data productions; and (b) extend the expert discovery deadlines in this action by two (2) months. In support of the requested relief, the parties state as follows:

1. On February 14, 2024, this Court entered an agreed schedule for combined class and merits expert discovery. (Dkt. No. 158.) Opening expert reports on class and merits issues for which a party bears the burden of proof are to be served by 1/15/2026. *Id.* Opposing expert reports are due by 3/26/2026. *Id.* Rebuttal expert reports are due by 6/4/2026. *Id.* Expert depositions are to be completed by 7/16/2026. *Id.*

2. On June 28, 2024, the parties filed a Joint Status Report proposing various interim discovery deadlines, including a deadline of August 16, 2024, for the parties to agree to a substantial completion deadline for data productions. (Dkt. No. 189.)

3. On July 2, 2024, this Court adopted the interim discovery deadlines proposed in the parties' June 28, 2024 Joint Status Report. (Dkt. No. 190.)

4. In the weeks leading up to August 16, 2024, the parties met and conferred several times and exchanged several rounds of correspondence regarding the substantial completion deadline for data productions.

5. The parties ultimately agreed to a substantial completion deadline for data productions of December 16, 2024. The parties also agreed to seek a two-month extension in the current schedule for combined class and merits expert discovery due to the volume and complexity of structured data at issue.

6. This is the first request for a modification of the schedule for combined class and merits expert discovery.

WHEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties:

1. The substantial completion deadline for data productions shall be December 16, 2024.

2. The deadline for serving opening expert reports on class and merits issues for which a party bears the burden of proof should be extended to March 16, 2026.

3. The deadline for serving opposing expert reports should be extended to May 26, 2026.

4. The deadline for serving rebuttal expert reports should be extended to August 4,

2026.

5. The deadline for completing expert depositions should be extended to September 17, 2026.

THE PARTIES JOINTLY MOVE for a Court order (1) entering the stipulated substantial completion deadline for data productions and (2) extending the schedule for combined class and merits expert discovery as stipulated above.

Dated: September 10, 2024

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CERTIFICATE OF SERVICE

I, Hill Brakefield, an attorney, hereby certify that this STIPULATED MOTION TO AMEND SCHEDULE was electronically filed on September 10, 2024, and will be served electronically via the Court's ECF Notice system upon the registered parties of record.

Respectfully submitted,

/s/ Hill Brakefield

Hill Brakefield

*Interim Co-Lead Class Counsel for Plaintiffs and the
Proposed Class*