

EXHIBIT J

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Subject: Dale et al v. Deutsche Telekom AG et al - Case 1:22-cv-03189 - Search Terms and TAR Disclosure
Date: Friday, September 13, 2024 5:25:31 PM
Attachments: [external.png](#)
[2024.09.12 - TMO-DALE - Search Terms.xlsx](#)

 External email >

All –

Attached please find the search terms T-Mobile intends to run across its ESI custodians' files to identify documents potentially responsive to Plaintiffs' requests for production, subject to the parties' agreement regarding the scope of the requests and T-Mobile's responses and objections.

Additionally, as we have previously informed Plaintiffs, after T-Mobile runs the search terms across the custodians' ESI, T-Mobile plans to use Technology Assisted Review to review documents that hit on the search terms. Pursuant to the Order re Protocol for the Production of Electronically Stored Information (ESI), this email also serves to disclose to you “the vendor and the TAR technology or tool being used, including a description of the TAR tool’s procedures.” Dkt No. 181, ¶ 17.

We are using Active Learning in Relativity through the vendor, Lighthouse. Below is a link to the documentation for Active Learning.

[Active Learning \(relativity.com\)](#)

Please respond with any questions or proposed changes to the search terms by September 26. T-Mobile is aiming to apply the terms and start the review process for the 47 custodians that the parties agreed to by September 30.

Thank you,

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