

**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

**PLAINTIFFS' NOTICE OF MOTION TO COMPEL DISH TO PRODUCE DISCOVERY
RESPONSIVE TO PLAINTIFFS' SUBPOENA**

PLEASE TAKE NOTICE that, for the reasons set forth in the accompanying Memorandum of Law and Declaration of Swathi Bojedla, dated February 13, 2025, with exhibits, Plaintiffs move the Court, the Honorable Jeffrey Cole, United States Magistrate Judge for the Northern District of Illinois, Eastern Division, 219 South Dearborn St., Chicago, Illinois for an Order to compel DISH Network Inc. ("DISH") to produce documents, communications, ESI, and structured data responsive to Requests in Plaintiffs' Subpoena.

Plaintiffs met and conferred with DISH regarding a briefing schedule but did not come to an agreement. Plaintiffs propose DISH serve its opposition papers by February 27, 2025 and that Plaintiffs serve their reply papers by March 7, 2025. DISH proposes to serve its opposition papers within three and a half weeks of this motion, and for Plaintiffs to serve their reply papers within one week thereafter.

Dated: February 13, 2025

/s/ Gary I. Smith, Jr.

Gary I. Smith Jr. (*pro hac vice*)
HAUSFELD LLP
580 California Street, 12th Floor
San Francisco, CA 94111
Phone: (415) 633-1908
gsmith@hausfeld.com

Swathi Bojedla (*pro hac vice*)
HAUSFELD LLP
888 16th Street NW, Suite 300
Washington, D.C. 20006
Phone: (202) 540-7200
sbojedla@hausfeld.com

Renner Walker (*pro hac vice*)
HAUSFELD LLP
33 Whitehall Street, 14th Floor
New York, NY 10004
Phone: (646) 357-1100
rwalker@hausfeld.com

Brendan P. Glackin (*pro hac vice*)
Lin Y. Chan (*pro hac vice*)
Nicholas W. Lee (*pro hac vice*)
Sarah D. Zandi (*pro hac vice*)
Courtney J. Liss (*pro hac vice*)
Jules A. Ross (*pro hac vice*)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-
3339 Phone: (415) 956-1000
bglackin@lchb.com
lchan@lchb.com
nlee@lchb.com
szandi@lchb.com
cliss@lchb.com
jross@lchb.com

Eric L. Cramer (*pro hac vice*)
Jeremy Gradwohl (*pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Phone: (415) 215-0962
Phone: (215) 715-3256
ecramer@bm.net
jgradwohl@bm.net

Robert Litan (*pro hac vice*)
BERGER MONTAGUE PC
1001 G St, NW Suite 400 East
Washington, D.C. 20001
Phone: (202) 559-9745
rlitan@bm.net

Joshua P. Davis (*pro hac vice*)
Kyla Gibboney (*pro hac vice*)
Julie Pollock (*pro hac vice*)
BERGER MONTAGUE PC
505 Montgomery Street, Suite
625 San Francisco, CA 94111
Phone: (415) 689-9292
jdavis@bm.net
kgibboney@bm.net
jpollock@bm.net

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

Kenneth N. Flaxman ARDC No. 830399
Joel Flaxman ARDC No. 6292818
LAW OFFICES OF KENNETH N. FLAXMAN
P.C.
200 S Michigan Ave., Suite 201
Chicago, IL 60604
Phone: (312) 427-3200
jaf@kenlaw.com
knf@kenlaw.com

*Interim Liaison Counsel for Plaintiffs and the
Proposed Class*

CERTIFICATE OF SERVICE

I, Gary I. Smith, Jr. an attorney, hereby certify that the foregoing notice of motion was electronically filed on February 13, 2025, and will be served electronically via the Court's ECF Notice system upon the registered parties of record. Additionally, the foregoing document were also served via email on Clifford Yin, Counsel for DISH Network, Inc. (cyin@coblentzlaw.com) and Amber Leong, Counsel for DISH Network, Inc. (aleong@coblentzlaw.com).

Respectfully submitted,

/s/ Gary I. Smith, Jr.

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