

**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.

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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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