

EXHIBIT I

From: [Leong, Amber](#)
To: [Hill Brakefield](#); [Yin, Clifford](#); [Patch, Richard](#); [Vittoria, Cathy](#); [Flood, Laura](#); [Dallas, Melissa](#)
Cc: [Swathi Bojedla](#); [Valdes, Jose](#)
Subject: RE: Data Sample from DISH - Dale, et al. v. Duetsche Telekom AG, et al.
Date: Friday, September 27, 2024 5:27:51 PM
Attachments: [image001.png](#)
[image002.png](#)
[external.png](#)



Hill:

Thank you for your email.

This email was the first time that you provided to us the data fields that T-Mobile is apparently producing in this case. It appears that you provided those data fields to the other third parties earlier for some reason.

Given your email, it seems like your first priority is receiving from DISH proposed data fields. We will agree to provide proposed data fields but need to meet and confer with you about them. How about a meet and confer call on either Thursday, October 3 or Friday, October 4?

We are also producing a second production today with Bates Nos. **DISH00004149– DISH00006252**. Please note that those tagged Highly Confidential have also been tagged AEO. You can find them as follows:

BOX LINK: <https://coblentzlaw.box.com/s/0fc98c96ksmmbur54zf6c3tqu5gc7sh8>. You will receive a password to open the zip file in a separate email from our team shortly.

Thank you,

Amber

Amber Leong | Associate
Coblentz Patch Duffy & Bass LLP
415-268-0535 | Office 415-391-4800

This transmittal is intended solely for use by its addressee, and may contain confidential or legally privileged information. If you receive this transmittal in error, please email a reply to the sender and delete the transmittal and any attachments.

From: Hill Brakefield <hbrakefield@hausfeld.com>
Sent: Thursday, September 19, 2024 1:08 PM
To: Leong, Amber <aleong@coblentzlaw.com>; Yin, Clifford <cyin@coblentzlaw.com>; Patch, Richard <rpatch@coblentzlaw.com>; Vittoria, Cathy <cvittoria@coblentzlaw.com>; Flood, Laura <lflood@coblentzlaw.com>; Dallas, Melissa <mdallas@coblentzlaw.com>

Cc: Swathi Bojedla <sbojedla@hausfeld.com>

Subject: [EXTERNAL] Data Sample from DISH - Dale, et al. v. Duetsche Telekom AG, et al.

Counsel,

T-Mobile granted us permission to share with you on an outside counsel only basis the data fields it is producing in this case. The attached, Highly Confidential data dictionary lists those fields. We hope this will guide you as you work with DISH to pull the data responsive to Plaintiffs' requests.

We have either already received or anticipate shortly receiving data samples from the other third parties to which we issued subpoenas. DISH remains the lone party that has not meaningfully engaged in discussions to the resolve Plaintiffs' outstanding subpoenas.

We are disappointed that we still do not have a response on the narrowing Plaintiffs' proposed on May 31. If DISH would like to avoid the costs of court intervention, please provide us with a data sample by the end of this month. Further delay—particularly considering the progress seen from other third parties—is highly prejudicial to Plaintiffs.

Regards,


HILL BRAKEFIELD
Associate
hbrakefield@hausfeld.com



888 16th Street, N.W.
Suite 300
Washington, DC 20006
+1 202 540 7200
hausfeld.com

This electronic mail transmission from Hausfeld LLP may contain confidential or privileged information. If you believe you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.