

**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' CORRECTED 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 that DISH serve its opposition papers within two weeks of the motion and that Plaintiffs serve their reply papers within one week thereafter. DISH does not agree with Plaintiffs' proposal.

Dated: February 14, 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 14, 2025, and will be served electronically via the Court's ECF Notice system upon the registered parties of record. Additionally, the foregoing document was also served via email on Clifford Yin, Counsel for DISH Network, Inc. (cyin@coblenzlaw.com), Amber Leong, Counsel for DISH Network, Inc. (aleong@coblenzlaw.com), Monica McCarroll, Counsel for DISH Network, Inc. (mmccarroll@redgravellp.com), and Kevin Reiss, Counsel for DISH Network, Inc. (kreiss@redgravellp.com).

Respectfully submitted,

/s/ Gary I. Smith, Jr.

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