

# EXHIBIT 30

**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 et al.,

*Defendants.*

Case No. 1:22-cv-03189

Hon. Thomas M. Durkin

Hon. Jeffrey Cole

**DEFENDANT T-MOBILE US, INC.’S RULE 26(A)(1) INITIAL DISCLOSURES**

Defendant T-Mobile US, Inc. (“T-Mobile”), by and through its undersigned counsel, hereby provides its initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1).

**PRELIMINARY STATEMENT**

These disclosures reflect T-Mobile’s good faith compliance with Rule 26 based on the allegations set forth in Plaintiffs’ Class Action Complaint (Dkt. 1) and on information reasonably available to T-Mobile at this time. T-Mobile’s investigation of the facts pertaining to this matter are still ongoing, and T-Mobile reserves its Federal Rule of Civil Procedure 26(e) right to supplement and/or amend these disclosures at the appropriate time. In particular, and without limitation, T-Mobile reserves the right to identify additional individuals and to identify and produce additional documents and other such information as they become known or available.

By making these disclosures, T-Mobile does not represent that it is identifying every document, tangible thing, or witness potentially relevant to this lawsuit; does not concede the

relevance of any of the information provided; and is not waiving any protections available pursuant to the attorney-client privilege, the work product doctrine, or any other applicable privilege. Finally, these disclosures are made without waiver of T-Mobile's right to object on any other ground to the use of any information disclosed herein in this action or any other action and/or its right to object to any discovery requests relating to these disclosures. All of the disclosures set forth below are made subject to the above objections and qualifications.

**I. Individuals Likely to Have Discoverable Information that T-Mobile May Use to Support Its Claims or Defenses [Fed. R. Civ. P. 26(a)(1)(A)(i)]**

Based on the allegations in the Complaint and the information currently available to T-Mobile after reasonable investigation, T-Mobile presently believes that the following individuals may have discoverable information that T-Mobile may use to support its defenses in this action. T-Mobile anticipates that other individuals or categories of individuals may also have discoverable information, and specifically reserves the right to identify additional witnesses as discovery proceeds, including whomever Plaintiffs may designate as witnesses, representative witnesses appearing pursuant to Federal Rule of Civil Procedure 30(b)(6), rebuttal and impeachment witnesses, third-party witnesses, and any additional witnesses that may become known as additional facts and issues are identified during the course of T-Mobile's ongoing factual investigation and discovery. Further, by indicating the general subject matter of information these individuals or categories of individuals may possess, T-Mobile is in no way limiting its right to call any individual listed to testify concerning other subjects. Some of the individuals listed below may have information that constitutes or includes expert analysis or expert opinion. Identifying such individuals at this time shall not constitute a waiver of the right to call and/or rely on such individuals as experts, nor does their disclosure constitute an agreement to commence expert

discovery at this time. Moreover, identification of the individuals listed below should not be construed as consent by any individual to submit to the jurisdiction of this Court.

Individuals who testified at trial in *New York v. Deutsche Telekom AG*, Case No. 1:19-cv-05434-VM-RWL (S.D.N.Y.) are denoted with an asterisk next to their name and title. As used herein, the Merger is the merger of T-Mobile and Sprint announced on April 29, 2018.

All communications with current or former employees and directors of T-Mobile should be made only through T-Mobile's counsel of record at Gibson, Dunn & Crutcher LLP.

Name & Title	Likely Subject(s) of Discoverable Information	Contact Information
<b>Defendants and Third Parties</b>		
Ankur Kapoor, Senior Vice President of Network Strategy and Evolution, T-Mobile*	Information regarding T-Mobile's wireless network technology and strategy; information regarding T-Mobile's wireless network design and operation; information regarding T-Mobile's wireless network costs; and information regarding T-Mobile's investments in its 5G network and its expansion efforts.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Doug Chartier, Senior Vice President of T-Mobile Retail, T-Mobile	Information regarding T-Mobile's sales and distribution channels; and information regarding T-Mobile's customer segments.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Jon Freier, President of Consumer Group, T-Mobile	Information regarding T-Mobile's customer services; information regarding T-Mobile's sales and distribution channels; information regarding T-Mobile's customer segments; information regarding T-Mobile's consumer operations and planning; and information regarding T-Mobile's customer acquisition and retention efforts.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715

Name & Title	Likely Subject(s) of Discoverable Information	Contact Information
John Legere, former President and Chief Executive Officer, T-Mobile*	Information regarding T-Mobile's business strategy; information regarding competition in the alleged relevant market before the Merger; and information regarding business conditions and competitive landscape in the alleged relevant market before the Merger.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Michael Sievert, President and Chief Executive Officer, T-Mobile*	Information regarding T-Mobile's business strategy; information regarding competition in the alleged relevant market before and after the Merger; and information regarding business conditions and competitive landscape in the alleged relevant market before and after the Merger.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Mike Katz, President of Marketing, Strategy and Products, T-Mobile	Information regarding T-Mobile's consumer marketing strategy; information regarding T-Mobile's MVNO and retail pricing strategy; information regarding T-Mobile's broadband business and strategy; information regarding T-Mobile's corporate strategy and analytics; information regarding T-Mobile's pre-paid business and strategy; information regarding T-Mobile's retail cost-structure; information regarding retail wireless costs; and information regarding T-Mobile's customer products.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Neville Ray, former Executive Vice President and Chief Technology Officer, T-Mobile*	Information regarding T-Mobile's wireless network technology, strategy, and evolution; information regarding engineering and operations; and information regarding spectrum portfolio.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715

Name & Title	Likely Subject(s) of Discoverable Information	Contact Information
Peter Ewens, Executive Vice President, Corporate Strategy and Development, T-Mobile	Information regarding T-Mobile's business strategy; information regarding competition in the alleged relevant market before and after the Merger; and information regarding business conditions and competitive landscape in the alleged relevant market before and after the Merger.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Peter Osvaldik, Executive Vice President and Chief Financial Officer, T-Mobile	Information regarding T-Mobile's financial performance and procurement costs in the alleged relevant market before and after the Merger.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Raul Marcelo Claure, former Executive Chairman, Sprint; Director, T-Mobile*	Information regarding Sprint's business strategy; information regarding competition in the alleged relevant market before and after the Merger; and information regarding business conditions and competitive landscape in the alleged relevant market before and after the Merger.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Thomas Keys, former Executive Vice President of Strategy, T-Mobile	Information regarding T-Mobile's business strategy; information regarding competition in the alleged market before and after the Merger; information regarding business conditions and competitive landscape in the alleged relevant market before and after the Merger.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715
Ulf Ewaldsson, President of Technology, T-Mobile	Information regarding T-Mobile's wireless network technology, strategy, and evolution; information regarding engineering and operations; and information regarding spectrum portfolio.	c/o Gibson, Dunn & Crutcher LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111-3715

Name & Title	Likely Subject(s) of Discoverable Information	Contact Information
Charles Ergen, Chairman of the Board, DISH*	Information regarding DISH's business strategy and competition in the alleged relevant market; information regarding DISH's plans to construct its own 5G network; information regarding DISH's mobile wireless business; information regarding Boost Mobile; and information regarding the competitive landscape in the alleged relevant market before and after the Merger.	c/o Coblentz Patch Duffy & Bass LLP 1 Montgomery Street, Suite 3000 San Francisco, CA 94104
Michel Combes, former President, Chief Executive Officer, and Chief Financial Officer, Sprint*	Information regarding Sprint's business strategy and competition in the alleged relevant market before and after the Merger; and information regarding business conditions and competitive landscape in the alleged relevant market before and after the Merger.	Unknown
Thomas Cullen, Executive Vice President of Corporate Development, DISH*	Information regarding DISH's business strategy and plans to compete in the alleged relevant market; information regarding DISH's plans to construct its own 5G network; and information regarding competitive landscape in the alleged relevant market before and after the Merger.	c/o Coblentz Patch Duffy & Bass LLP 1 Montgomery Street, Suite 3000 San Francisco, CA 94104
Plaintiffs		
Anthony Dale	Information regarding his allegations in the Complaint; information regarding his use and purchases of retail mobile wireless services; and information regarding his purported injury resulting from the Merger.	c/o Lieff Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339
Brett Jackson	Information regarding his allegations in the Complaint; information regarding his use	c/o Lieff Cabraser Heimann & Bernstein, LLP 275 Battery Street, 29th Floor

Name & Title	Likely Subject(s) of Discoverable Information	Contact Information
	and purchases of retail mobile wireless services; and information regarding his purported injury resulting from the Merger.	San Francisco, CA 94111-3339
Johnna Fox	Information regarding her allegations in the Complaint; information regarding her use and purchases of retail mobile wireless services; and information regarding her purported injury resulting from the Merger.	c/o Lieff Cabraser Hiemann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339
Benjamin Borrowman	Information regarding his allegations in the Complaint; information regarding his use and purchases of retail mobile wireless services; and information regarding his purported injury resulting from the Merger.	c/o Lieff Cabraser Hiemann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339
Ann Lambert	Information regarding her allegations in the Complaint; information regarding her use and purchases of retail mobile wireless services; and information regarding her purported injury resulting from the Merger.	c/o Lieff Cabraser Hiemann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339
Robert Anderson	Information regarding his allegations in the Complaint; information regarding his use and purchases of retail mobile wireless services; and information regarding his purported injury resulting from the Merger.	c/o Lieff Cabraser Hiemann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339
Chad Hohenberg	Information regarding his allegations in the Complaint; information regarding his use and purchases of retail mobile wireless services; and information regarding his purported injury resulting from the Merger.	c/o Lieff Cabraser Hiemann & Bernstein, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111-3339

In addition to the persons listed above, T-Mobile also identifies all persons named in Plaintiffs' initial and/or supplemental disclosures, as well as all persons named in witness lists served by any other party in this action, all individuals deposed in this action, any person identified in the documents disclosed under Rule 26(a)(1)(A)(ii) and described below, and any person necessary to lay the required foundation for any document or other evidence. T-Mobile also reserves the right to seek discovery from such other persons who may subsequently become known as persons likely to have discoverable information relevant to the disputed facts, including those relevant to T-Mobile's defenses.

## **II. Description of Documents [Fed. R. Civ. P. 26(a)(1)(A)(ii)]**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), and based on information currently and reasonably available to T-Mobile, T-Mobile discloses the following categories of documents in T-Mobile's possession, custody, or control that T-Mobile may use to support its defenses. T-Mobile expressly reserves the right to identify and use documents from additional categories if, in the course of discovery and its investigation relating to this case, T-Mobile learns that such additional categories contain relevant documents or if they are requested by any party in discovery.

1. Documents and data related to the Merger.
2. Documents and data related to T-Mobile's business strategy, operations, engineering, and financial performance in the alleged relevant market.
3. Documents and data related to the alleged relevant products.
4. Documents and data related to T-Mobile's development of a 5G network.
5. Documents and data related to T-Mobile's costs during the Merger and post-Merger period, including in the alleged relevant market.

6. Documents and data related to T-Mobile's competition and competitors in the alleged relevant market.
7. Documents and data related to T-Mobile's lack of market power in the alleged relevant market.
8. Documents and data related to T-Mobile's agreements regarding the alleged relevant market, including agreements with retail customers concerning the alleged relevant products.
9. Documents produced by T-Mobile, other parties, or third parties in response to any discovery requests or subpoenas propounded by Plaintiffs in this litigation.
10. Documents and data refuting Plaintiffs' allegations that the Merger has caused anticompetitive harm in the purported alleged relevant market.
11. Documents and data supporting the denial of the class certification sought by Plaintiffs.
12. Documents and data supporting T-Mobile's affirmative defenses.

T-Mobile expressly reserves the right to use or rely on any documents that Plaintiffs identify in their Rule 26(a)(1) disclosures, or that are otherwise disclosed in connection with the claims, defenses, or conduct at issue in this case. By identifying the foregoing categories of documents, T-Mobile expressly reserves all objections, privileges, and protections against discovery or admission under Federal and Local Rules or other laws, orders, agreements, or authorities. T-Mobile also reserves the right to supplement these disclosures subject to all available protections or privileges on the use or admissibility of any information disclosed.

**III. Computation of Damages [Fed. R. Civ. P. 26(a)(1)(A)(iii)]**

T-Mobile makes no disclosure pursuant to Rule 26(a)(1)(A)(iii) of the Federal Rules of Civil Procedure because T-Mobile does not presently seek any damages in this action.

Pursuant to Rule 26(a)(1)(A)(iii), T-Mobile denies that Plaintiffs have sustained any damages. T-Mobile reserves the right to seek to recover attorneys' fees and other costs incurred in defending this action to the extent such recovery is permissible.

**IV. Insurance Agreements [Fed. R. Civ. P. 26(a)(1)(A)(iv)]**

T-Mobile is not currently aware of any insurance agreement that could be used to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment. T-Mobile's investigation is ongoing, and T-Mobile reserves the right to amend and/or supplement these disclosures should additional information become available.

**V. Certification of Disclosure**

The undersigned hereby certifies that, to the best of her knowledge, information, and belief, formed after an inquiry that is reasonable under the circumstances, this disclosure is complete and correct as of the time it is made.

Dated: December 18, 2023

Respectfully submitted,

/s/ Rachel S. Brass

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