

# **EXHIBIT K1**

**From:** [Swathi Bojedla](#)  
**To:** [Jose Roman Lavergne](#); [Ludwig, Jordan](#); [Roth, Martin L.](#); [Bauer, Amie Marie](#); [Al Dajani, Ahmad](#); [Kelley, Molly](#)  
**Cc:** [TMobile Merger AT](#)  
**Subject:** RE: Subpoena to AT&T - Dale, et al. v. Deutsche Telekom AG, et al.  
**Date:** Monday, February 24, 2025 11:41:55 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image965550.png](#)  
[image777645.png](#)  
[TMO - Letter to ATT re Subpoena 02.14.2025.pdf](#)  
[2025.02.24 TMO re Search Terms and Custodians for ATT.xlsx](#)

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Counsel, following up on Jose's letter, we have not received a response from AT&T on our compromise proposals and request for custodians and search terms. Given AT&T's refusal to engage in custodial discussions thus far, and in the hopes of avoiding motion practice, we've put together a list of proposed custodians and search terms for document production pursuant to the subpoena. If we cannot reach a reasonable agreement on document production, we would plan to ask the Court to order production under these terms. As Jose indicated in his letter, please let us know your availability this week to meet and confer.

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**From:** Jose Roman Lavergne <[jlavergne@hausfeld.com](mailto:jlavergne@hausfeld.com)>  
**Sent:** Friday, February 14, 2025 8:24 PM  
**To:** [Ludwig, Jordan <JLudwig@crowell.com>](mailto:JLudwig@crowell.com); [Roth, Martin L. <rothm@kirkland.com>](mailto:rothm@kirkland.com); [Bauer, Amie Marie <amie.bauer@kirkland.com>](mailto:amie.bauer@kirkland.com); [Al Dajani, Ahmad <AAIDajani@crowell.com>](mailto:AAIDajani@crowell.com); [Kelley, Molly <molly.kelley@kirkland.com>](mailto:molly.kelley@kirkland.com)  
**Cc:** [TMobile Merger AT <TMobileMergerAT@hausfeld.com>](mailto:TMobileMergerAT@hausfeld.com)  
**Subject:** Subpoena to AT&T - Dale, et al. v. Deutsche Telekom AG, et al.

Counsel,

Please find attached Plaintiffs' letter regarding our subpoena to AT&T.

Best regards,  
Jose

<!--[if !vml]--><!--[endif]--> 

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