

## **EXHIBIT C**

**From:** Horan, Theresa Cederoth  
**To:** Swathi Bojedla; Hill Brakefield  
**Cc:** Filip, Mark; Nealy Cox, Erin; Cottrell, Christa C.; Roth, Martin L.; \*OAntoine@crowell.com; Ludwig, Jordan; Bauer, Amie Marie; jaf@kenlaw.com; knf@kenlaw.com; Gary I. Smith, Jr.  
**Subject:** RE: Dale et al. v. Deutsche Telekom, AG et al. -- Subpoena to AT&T  
**Date:** Monday, April 29, 2024 9:43:00 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[external.png](#)

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Swathi,

Thanks for your note. Our understanding after our last call had been that plaintiffs were evaluating ways to narrow your discovery requests and would be sending us a letter, and we haven't received that yet. Regardless, we do not think third party discovery discussions should move forward right now given T-Mobile's pending 1292(b) request to the 7th Circuit. We will be ready to resume discussions if the 7th Circuit does not take up the appeal.

Best,  
Theresa

Theresa Horan

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**From:** Swathi Bojedla <sbojedla@hausfeld.com>  
**Sent:** Wednesday, April 24, 2024 3:42 PM  
**To:** Horan, Theresa Cederoth <theresa.horan@kirkland.com>; Hill Brakefield <hbrakefield@hausfeld.com>  
**Cc:** Filip, Mark <mark.filip@kirkland.com>; Nealy Cox, Erin <erin.nealycox@kirkland.com>; Cottrell, Christa C. <ccottrell@kirkland.com>; Roth, Martin L. <rothm@kirkland.com>; \*OAntoine@crowell.com <OAntoine@crowell.com>; Ludwig, Jordan <JLudwig@crowell.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; jaf@kenlaw.com; knf@kenlaw.com; Gary I. Smith, Jr. <GSmith@hausfeld.com>  
**Subject:** RE: Dale et al. v. Deutsche Telekom, AG et al. -- Subpoena to AT&T

Hi Theresa,

Can you please let us know your availability to pick up our meet and confer efforts? I believe we were waiting on some information from your client, including the availability of productions from prior litigation and to government regulators, as well as your position on the proposed narrowing we discussed at the last meet and confer. Please let us know if you have availability next week.

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**SWATHI BOJEDLA**

Partner

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**From:** Horan, Theresa Cederoth <[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)>

**Sent:** Tuesday, March 5, 2024 8:53 AM

**To:** Hill Brakefield <[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)>

**Cc:** Filip, Mark <[mark.filip@kirkland.com](mailto:mark.filip@kirkland.com)>; Nealy Cox, Erin <[erin.nealycox@kirkland.com](mailto:erin.nealycox@kirkland.com)>; Cottrell, Christa C. <[ccottrell@kirkland.com](mailto:ccottrell@kirkland.com)>; Roth, Martin L. <[rothm@kirkland.com](mailto:rothm@kirkland.com)>; \*[OAntoine@crowell.com](mailto:OAntoine@crowell.com)<[OAntoine@crowell.com](mailto:OAntoine@crowell.com)>; Ludwig, Jordan <[JLudwig@crowell.com](mailto:JLudwig@crowell.com)>; Bauer, Amie Marie <[amie.bauer@kirkland.com](mailto:amie.bauer@kirkland.com)>; [jaf@kenlaw.com](mailto:jaf@kenlaw.com); [knf@kenlaw.com](mailto:knf@kenlaw.com); Gary I. Smith, Jr. <[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>; Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>

**Subject:** Re: Dale et al. v. Deutsche Telekom, AG et al. -- Subpoena to AT&T

That works for us. I'll send around a dial-in. Thanks.

**Theresa Horan**

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On Mar 4, 2024, at 11:54 AM, Hill Brakefield <[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)> wrote:

Theresa,

We are available at 2:00pm (CT) on Tuesday 3/12. I can circulate a calendar invite if that time still works for you.

Regards,

<image001.png>

**HILL BRAKEFIELD**

Associate

[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)

<image002.png>

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**From:** Horan, Theresa Cederoth <[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)>

**Sent:** Thursday, February 29, 2024 2:57 PM

**To:** Hill Brakefield <[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)>; Filip, Mark <[mark.filip@kirkland.com](mailto:mark.filip@kirkland.com)>;

Nealy Cox, Erin <[erin.nealycox@kirkland.com](mailto:erin.nealycox@kirkland.com)>; Cottrell, Christa C.

<[ccottrell@kirkland.com](mailto:ccottrell@kirkland.com)>; Roth, Martin L. <[rothm@kirkland.com](mailto:rothm@kirkland.com)>;

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<[JLudwig@crowell.com](mailto:JLudwig@crowell.com)>; Bauer, Amie Marie <[amie.bauer@kirkland.com](mailto:amie.bauer@kirkland.com)>

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**Subject:** RE: Dale et al. v. Deutsche Telekom, AG et al. -- Subpoena to AT&T

Hi Hill,

We have travel conflicts next week, but we're available Tuesday 3/12 between 2:00 – 4:30 CT or Wednesday 3/13 from 3:30-4:30 CT. Please let us know what works for you.

Thanks,

Theresa

**Theresa Horan**

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**From:** Hill Brakefield <[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)>  
**Sent:** Tuesday, February 27, 2024 10:47 AM  
**To:** Horan, Theresa Cederoth <[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)>; Filip, Mark <[mark.filip@kirkland.com](mailto:mark.filip@kirkland.com)>; Nealy Cox, Erin <[erin.nealycox@kirkland.com](mailto:erin.nealycox@kirkland.com)>; Cottrell, Christa C. <[ccottrell@kirkland.com](mailto:ccottrell@kirkland.com)>; Roth, Martin L. <[rothm@kirkland.com](mailto:rothm@kirkland.com)>; \*OAntoine@crowell.com <[OAntoine@crowell.com](mailto:OAntoine@crowell.com)>; Ludwig, Jordan <[JLudwig@crowell.com](mailto:JLudwig@crowell.com)>; Bauer, Amie Marie <[amie.bauer@kirkland.com](mailto:amie.bauer@kirkland.com)>  
**Cc:** [jaf@kenlaw.com](mailto:jaf@kenlaw.com); [knf@kenlaw.com](mailto:knf@kenlaw.com); Gary I. Smith, Jr. <[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>; Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>  
**Subject:** RE: Dale et al. v. Deutsche Telekom, AG et al. -- Subpoena to AT&T

Counsel,

Thank you for the attached responses and objections. We would like to schedule a meeting to discuss those Requests for which AT&T indicated it is willing to meet and confer and to resolve any disputes over the Requests for which AT&T stated it will not produce documents. Please let me know your availability to meet and confer next week.

Regards,

<image001.png>

**HILL BRAKEFIELD**

Associate

[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)

<image002.png>

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**From:** Horan, Theresa Cederoth <[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)>  
**Sent:** Wednesday, January 31, 2024 6:55 PM  
**To:** Brendan P. Glackin <[bglackin@lchb.com](mailto:bglackin@lchb.com)>; Chan, Lin Y. <[lchan@lchb.com](mailto:lchan@lchb.com)>; Nicholas W. Lee <[nlee@lchb.com](mailto:nlee@lchb.com)>; Sarah Zandi <[szandi@lchb.com](mailto:szandi@lchb.com)>; [jaf@kenlaw.com](mailto:jaf@kenlaw.com); [knf@kenlaw.com](mailto:knf@kenlaw.com); [jaf@kenlaw.com](mailto:jaf@kenlaw.com); [knf@kenlaw.com](mailto:knf@kenlaw.com); Robert E. Litan <[rliitan@bm.net](mailto:rliitan@bm.net)>; Joshua P. Davis <[jdavis@bm.net](mailto:jdavis@bm.net)>; Gary I. Smith, Jr. <[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>  
**Cc:** Filip, Mark <[mark.filip@kirkland.com](mailto:mark.filip@kirkland.com)>; Nealy Cox, Erin <[erin.nealycox@kirkland.com](mailto:erin.nealycox@kirkland.com)>; Cottrell, Christa C. <[ccottrell@kirkland.com](mailto:ccottrell@kirkland.com)>; Roth, Martin L. <[rothm@kirkland.com](mailto:rothm@kirkland.com)>; Antoine, Olivier <[oantoine@crowell.com](mailto:oantoine@crowell.com)>; Ludwig, Jordan <[JLudwig@crowell.com](mailto:JLudwig@crowell.com)>;

Bauer, Amie Marie <[amie.bauer@kirkland.com](mailto:amie.bauer@kirkland.com)>

**Subject:** Dale et al. v. Deutsche Telekom, AG et al.

Counsel,

Please see the attached, on behalf of AT&T. Thank you.

**Theresa Horan**

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