

## **EXHIBIT F**

**From:** [Horan, Theresa Cederoth](#)  
**To:** [Swathi Bojedla](#)  
**Cc:** [Filip, Mark](#); [Nealy Cox, Erin](#); [Cottrell, Christa C.](#); [Roth, Martin L.](#); [\\*OAntoine@crowell.com](#); [Ludwig, Jordan](#); [Bauer, Amie Marie](#); [Hill Brakefield](#); [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:** Wednesday, June 12, 2024 11:32:22 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[external.png](#)

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Swathi,

Following our last call, we wanted to get back to you on several points. First, per your requests regarding AT&T's prior productions in previous matters related to the T-Mobile/Sprint merger, AT&T has been able to locate certain collections of materials previously produced in 2018-2019 to DOJ, the NY Attorney General, and the defendants in the previous merger litigation. These prior productions contain materials in various categories Plaintiffs have requested from AT&T, including 5G rollout and associated costs; spectrum purchases and consolidation; competitive analysis; anticipated potential impacts of the merger; and AT&T's pricing and plans. AT&T does not concede that these categories of information are all relevant or necessary for third party discovery in this case, and we continue to believe that pre-merger documents are generally not relevant to the litigation. However, in the spirit of compromise and efficiency, if Plaintiffs will agree to drop their other requests for unstructured data from the pre-merger timeframe, AT&T would agree to reproduce these prior productions when we begin rolling production. Please let us know if Plaintiffs agree.

On structured data, AT&T believes the most efficient path forward is for the parties to the litigation to determine the parameters for T-Mobile's structured data productions first, and once that is worked out, AT&T can see if similar parameters would be workable (to the extent applicable). In the meantime, we are looking into what's available from AT&T's systems.

Per Plaintiffs' requests for documents regarding the named plaintiffs, we will need additional identifying information to locate them as AT&T subscribers. Could you please provide the phone numbers and addresses for any named plaintiffs who allege they were AT&T subscribers? We understand from the complaint that this universe is Anthony Dale, Benjamin Borrowman, and Ann Lambert (as it appears Brett Jackson recently withdrew from the case), although please let us know if that is not correct.

Finally, we can confirm that based on our investigation to date, AT&T is not aware of any non-public communications about the T-Mobile/Sprint merger between AT&T and a government entity after the time of the merger, nor is AT&T aware of any communications between AT&T and government entities or the named plaintiffs regarding this litigation.

We are continuing to review the other requests from your recent letter, and will be available to confer further as needed.

Thank you.

Theresa Horan

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**From:** Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>

**Sent:** Thursday, May 30, 2024 11:18 AM

**To:** Hill Brakefield <[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)>; Horan, Theresa Cederoth <[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.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 <[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; knf@kenlaw.com; Gary I. Smith, Jr. <[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>

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

Sorry, my fault on missing those times. Let's do 12:30-1:30 CT. I can send a calendar invite.

---

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

**Sent:** Thursday, May 30, 2024 12:08 PM

**To:** Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>; 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 <[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; knf@kenlaw.com; Gary I. Smith, Jr. <[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>

<[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>

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

Hi Swathi,

We'd offered a few times for this week but hadn't heard back from plaintiffs. Next week, we could speak Monday 6/3 between 12:30-1:30 or 3-4 CT. Let us know if sometime then works.

Thanks,

Theresa

**Theresa Horan**

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**From:** Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>

**Sent:** Wednesday, May 29, 2024 1:46 PM

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

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

Could we please have a date to continue meeting and conferring? Please provide a few options on Monday and Tuesday of next week.

---

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

**Sent:** Friday, May 17, 2024 5:22 PM

**To:** Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>; 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 <[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; knf@kenlaw.com; Gary I. Smith, Jr. <[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>

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

Thanks Swathi. Unfortunately in the interim we've now had conflicts come up for our team next Thursday, including a hearing scheduled at that time. We're coordinating schedules on our end and will reach out early next week to propose other potential time for the call. Have a good weekend.

**Theresa Horan**

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**From:** Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>

**Sent:** Friday, May 17, 2024 3:09 PM

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

Let's do 12-12:30 ET on Thursday if that still works on your end. Let me know and we'll send a calendar invite. We are also slightly delayed on our letter, but it should be to you by Monday if not earlier.

---

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

**Sent:** Tuesday, May 14, 2024 9:30 PM

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

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

We are available Thursday 5/23 between 10-12 CT. Let us know if sometime then works for plaintiffs.

Thanks,

Theresa

Theresa Horan

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**From:** Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>

**Sent:** Monday, May 13, 2024 12:24 PM

**To:** Horan, Theresa Cederoth <[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)>; Hill Brakefield <[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)>

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<GSmith@hausfeld.com>

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

We are preparing a letter and will send to you this week. Can we put a meet and confer on the schedule for next week? Let us know your availability.

---

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

**Sent:** Friday, May 10, 2024 6:17 PM

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

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

Hi Swathi,

We continue to believe that non-party discovery discussions aren't practical when the status of the case is uncertain on appeal. Nonetheless, if plaintiffs want to proceed with discovery discussions with AT&T, could you send us the letter you'd agreed to prepare after our last call outlining plaintiffs' narrowed requests and current asks? That would help frame our discussion and focus future negotiations. Once we've reviewed that, we can find a time to confer.

Best,

Theresa

Theresa Horan

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**From:** Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>

**Sent:** Thursday, May 9, 2024 10:48 AM

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

Theresa, we still haven't heard from the 7<sup>th</sup> Circuit and we do not want to delay these discussions any further, given the lack of any discovery stay. We'll request again a follow-up meet and confer, including to understand what (if any) documents and data remain from the pre-merger litigation or whether we need to negotiate production anew for those materials.

If we cannot get a meet and confer on the calendar, we may be forced to move to compel. Please let me know.

---

**SWATHI BOJEDLA**

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

**Sent:** Monday, April 29, 2024 9:42 AM

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

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

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](mailto:sbojedla@hausfeld.com)>

**Sent:** Wednesday, April 24, 2024 3:42 PM

**To:** Horan, Theresa Cederoth <[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)>; Hill Brakefield <[hbrakefield@hausfeld.com](mailto:hbrakefield@hausfeld.com)>

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**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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**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 <[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; 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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F +1 312 862 2200

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[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)

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)>; \*[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)>

**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

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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---

[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)

---

**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 <[rllitan@bm.net](mailto:rllitan@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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[theresa.horan@kirkland.com](mailto:theresa.horan@kirkland.com)

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