

**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. 22-cv-3189  
Judge Thomas M. Durkin  
Magistrate Judge Jeffrey Cole

**DEFENDANT T-MOBILE US, INC.’S  
MOTION FOR LEAVE TO FILE DOCUMENTS PROVISIONALLY UNDER SEAL**

Defendant T-Mobile US, Inc. (“T-Mobile”) hereby moves for an order directing that Exhibits 3, 5, 19, 22, 23, 32, 33, and 36 to the Declaration of Minae Yu in Support of T-Mobile’s Motion to Compel DISH Network Corp. to Produce Discovery Responsive to its Subpoena (“Declaration”), as well as an unredacted copy of the Declaration, be filed provisionally under seal pursuant to Local Rule 26.2.

The exhibits and portions of Ms. Yu’s declaration that T-Mobile seeks to file under seal constitutes, quotes or otherwise discloses the contents of documents that DISH designated as “Confidential” or “Highly Confidential Information” pursuant to the protective order in this matter. See ECF No. 98 at 2. DISH produced these documents in response to Plaintiffs’ subpoena. Plaintiffs subsequently provided copies of them to T-Mobile on August 13, 2024 and October 16, 2024. In accordance with the terms of the protective order, T-Mobile hereby seeks

leave to file the material identified above under seal provisionally to give DISH an opportunity to make the showings required by Local Civil Rule 26.2 to permanently seal the documents. Id. at 13–14.

DATED: March 21, 2025

Respectfully submitted,

/s/ Rachel S. Brass

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*Counsel for Defendant T-Mobile US, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2025, I electronically filed a copy of the foregoing through the Court's CM/ECF system, which will send notifications of the filing to all counsel of record.

*/s/ Rachel S. Brass*

Rachel S. Brass