

From: [Horan, Theresa Cederoth](#)
To: [Hill Brakefield](#); [Swathi Bojedla](#)
Cc: [Roth, Martin L.](#); [Bauer, Amie Marie](#); [Al Dajani, Ahmad](#); [Ludwig, Jordan](#)
Subject: RE: Dale - AT&T
Date: Tuesday, November 19, 2024 1:29:37 PM
Attachments: [image001.png](#)
[image002.png](#)

Hill and Swathi,

Based on your confirmation that Plaintiffs agree to comply with the data security provisions set forth in our September 20 proposal for structured data, we are providing AT&T's subscriber data sample today via secure transfer. These highly confidential materials are to be treated as Outside Counsel Only. Please let us know promptly if Plaintiffs have any questions or concerns regarding this sample, so that AT&T can begin preparing its subscriber data production.

As we have previewed in previous discussions and correspondence, AT&T is experiencing significant technical burdens and complications in trying to respond to Plaintiff's data requests and AT&T is still working through what will be technologically possible for its ultimate subscriber data production. We will update Plaintiffs if any adjustments prove necessary during the production preparation.

Thanks,
Theresa

Theresa Horan

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theresa.horan@kirkland.com

From: Hill Brakefield <hbrakefield@hausfeld.com>
Sent: Friday, November 15, 2024 9:43 AM
To: Ludwig, Jordan <JLudwig@crowell.com>; Swathi Bojedla <sbojedla@hausfeld.com>; Horan, Theresa Cederoth <theresa.horan@kirkland.com>
Cc: Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com <OAntoine@crowell.com>; Al Dajani, Ahmad <AAIDajani@crowell.com>
Subject: RE: Dale - AT&T

This message is from an EXTERNAL SENDER

Be cautious, particularly with links and attachments.

Jordan,

I am picking up the thread and think there is a path forward. Although the current confidentiality order has worked well for the parties and the third parties that have already shared structured data, Plaintiffs can

agree to making some amendments to avoid any court intervention. Later today I will circulate a redlined version of what AT&T initially proposed. I plan to copy T-Mobile's counsel on that email to go ahead and bring them in on the discussions.

To answer the questions in your previous message, Plaintiffs can agree to the data security standards for structured data. We will include a caveat that those provisions only apply prospectively given the parties have already exchanged some structured data under the terms of the current confidentiality order.

As for the Outside Counsel Only proposal, we don't think that is necessary. The current confidentiality order restricts sharing of Highly Confidential Information to outside counsel unless the parties reach an agreement permitting specific in-house counsel to gain access to that information. While Plaintiffs do not take a position on how to handle sharing information amongst in-house counsel, we imagine T-Mobile will want some ability to share information with in-house personnel. To short circuit that potential dispute between T-Mobile and AT&T we plan to propose language like that in the SDNY protective order (see pg. 13 in the attached pdf).

Finally, we will include some of the AI provisions you proposed in your September 20 markup.

We hope that the parties can iron things out quickly after I circulate our redlines.

Best,

HILL BRAKEFIELD

Associate

hbrakefield@hausfeld.com



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From: Ludwig, Jordan <JLudwig@crowell.com>

Sent: Tuesday, October 29, 2024 5:28 PM

To: Swathi Bojedla <sbojedla@hausfeld.com>; Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Cc: Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; Antoine, Olivier <OAntoine@crowell.com>; Al Dajani, Ahmad <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

Swathi,

Thanks for your note. We're open to discussing whether this could be done in an agreed supplement to the protective order, but it seems like having a separate order applying to AT&T's data may introduce some complications. We'd expect the other carriers will want the same level of data security to apply to their structured data as well, leading to serial side data agreements. If we can clarify language in the order to specify that these heightened data security standards apply just to structured data, would plaintiffs agree to these provisions being included in the main PO? Please also confirm whether Plaintiffs are in agreement with the data security provisions at least as applied to AT&T's data or if you have any proposed changes. AT&T remains prepared to provide a subscriber data sample once we have plaintiffs' agreement on these data security protections.

Regardless of the form of agreement on data security, we believe the PO will need to be amended to account for the Outside Counsel Only and AI protections that we proposed in our Sept. 20 markup. Could you confirm if Plaintiffs are in agreement with those edits reflected in our redline? We will need to get T-Mobile's alignment as well.

Thank you,
Jordan

Jordan Ludwig

Pronouns: he/him/his

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From: Swathi Bojedla <sbojedla@hausfeld.com>

Sent: Thursday, October 24, 2024 10:33 AM

To: Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Cc: Ludwig, Jordan <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; Antoine, Olivier <OAntoine@crowell.com>; Al Dajani, Ahmad <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

Theresa-

We've conferred with our IT folks and we think that, in theory, your proposed provisions could work. As we discussed, we would apply them to AT&T's structured data only. Could you please prepare a standalone agreement with your requested data security protocols for our review? Then we can discuss the best way to make it operational. We think we could do it by agreement rather than amending the PO, but open to discussion.

SWATHI BOJEDLA

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From: Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Sent: Friday, October 11, 2024 10:45 AM

To: Swathi Bojedla <sbojedla@hausfeld.com>

Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com <OAntoine@crowell.com>; Ahmad Al Dajani <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

Thanks for the update.

We have reviewed the points raised in your 10/3 letter. The data requested in these questions will largely be covered in AT&T's proposed subscriber data production, apart from certain items that AT&T does not maintain in its subscriber data. But we agree with your letter's suggestion that it's difficult to discuss these data issues without the context of the actual sample, and that the best path forward is for Plaintiffs to review AT&T sample data then let us know if your team still has questions. As we explained on September 20, AT&T is willing to provide a subscriber data sample once Plaintiffs confirm appropriate data security protections to safeguard structured data. Let us know your concerns, if any, on that front. AT&T has been working diligently to prepare a data sample and can provide it in short order once we have Plaintiffs' assurance on data security.

We'd note that the broad structured data pulls requested for this matter have been very burdensome within AT&T's systems. AT&T has devoted extensive time and expense to date in investigating responsive structured data and preparing its sample. AT&T reserves its rights to seek recovery of costs for its production burdens in responding to Plaintiffs' subpoena.

Thanks,
Theresa

Theresa Horan

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From: Swathi Bojedla <sbojedla@hausfeld.com>

Sent: Thursday, October 10, 2024 4:48 PM

To: Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; [*OAntoine@crowell.com](mailto:OAntoine@crowell.com) <OAntoine@crowell.com>; Ahmad Al Dajani <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

Hi Theresa-

Just to update you, we are conferring with our consultants to propose revisions.

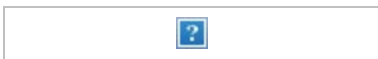
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From: Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Sent: Monday, October 7, 2024 4:08 PM

To: Swathi Bojedla <sbojedla@hausfeld.com>

Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; [*OAntoine@crowell.com](mailto:OAntoine@crowell.com) <OAntoine@crowell.com>; Ahmad Al Dajani <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

If the additional data security protocols included in our September 20 proposal were limited to just

structured data, would that resolve Plaintiffs' concerns? If there's any further concerns or questions, please let us know what they are, then we can look into them on AT&T's end so a call could be more productive. But if we can reach consensus here by limiting the new data security protections to structured data, that may be the easiest resolution.

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From: Swathi Bojedla <sbojedla@hausfeld.com>

Sent: Friday, October 4, 2024 3:07 PM

To: Horan, Theresa Cederoth <theresa.horan@kirkland.com>

Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com <OAntoine@crowell.com>; Ahmad Al Dajani <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>

Subject: Re: Dale - AT&T

Just as one example, read literally, it would require us to keep audit logs for the transmission of any document marked confidential in the case. Perhaps it makes sense to walk through your edits and understand where we can agree on provisions relating to your production of structured data without wholly rewriting a PO that was the subject of extensive negotiation to begin with, and with which Plaintiffs and T-Mobile have been complying without incident so far (including for data production.)

Let us know your availability early next week.

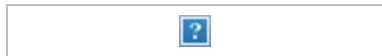
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On Oct 4, 2024, at 3:16 PM, Horan, Theresa Cederroth <theresa.horan@kirkland.com> wrote:

To clarify, do plaintiffs have any particular concerns on the provisions AT&T proposed? We can consider your request for an AT&T-specific supplemental order, but we're not clear on why (or how) different requirements would apply to different companies' productions. The proposed data security provisions are generally industry standards that most e-discovery vendors/law firms should be able to comply with.

Note we had also proposed amending the protective order to require Outside Counsel Only treatment for highly confidential materials. We assume that as a practical matter, this requires an amendment to the protective order rather than a separate supplement.

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From: Swathi Bojedla <sbojedla@hausfeld.com>

Sent: Friday, October 4, 2024 11:39 AM

To: Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com <OAntoine@crowell.com>; Ahmad Al Dajani <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

We have reviewed your revisions. Many of them are extreme to apply to all documents marked confidential/highly confidential in the case – which is essentially all documents. We propose instead a supplemental order specific to your data, rather than a wholesale revision of the PO. Assuming you're amenable, can you propose something?

<image001.png>

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<image002.png>

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From: Horan, Theresa Cederroth <theresa.horan@kirkland.com>
Sent: Friday, October 4, 2024 10:53 AM
To: Swathi Bojedla <sbojedla@hausfeld.com>
Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com <OAntoine@crowell.com>; Ahmad Al Dajani <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>
Subject: RE: Dale - AT&T

Swathi,

We are reviewing your letter and will prepare responses on the data questions. Regarding your request for a full data sample, as we explained in our September 20 letter, AT&T is willing to provide sample subscriber data once the data security protections proposed in the amended Confidentiality Order are in place. Can plaintiffs confirm your agreement to the provisions we proposed?

Thanks,
Theresa

Theresa Horan

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From: Swathi Bojedla <sbojedla@hausfeld.com>
Sent: Thursday, October 3, 2024 3:28 PM
To: Horan, Theresa Cederroth <theresa.horan@kirkland.com>
Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com <OAntoine@crowell.com>; Ahmad Al Dajani <AAlDajani@crowell.com>; Hill Brakefield

<hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

Theresa, please see the attached correspondence.

<image001.png>

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<image002.png>

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From: Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Sent: Monday, September 30, 2024 2:32 PM

To: Swathi Bojedla <sbojedla@hausfeld.com>

Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>;
Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com
<OAntoine@crowell.com>; Ahmad Al Dajani <AAIDajani@crowell.com>; Hill Brakefield
<hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

AT&T maintains one master subscriber database, and from our investigation to date, we are not aware of any other databases AT&T needs to draw from to respond to your subscriber data requests, 21 and 25. From that subscriber database, we have provided all the data fields we believe are relevant and responsive to those requests.

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From: Swathi Bojedla <sbojedla@hausfeld.com>
Sent: Friday, September 27, 2024 3:25 PM
To: Horan, Theresa Cederroth <theresa.horan@kirkland.com>
Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>;
Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com
<OAntoine@crowell.com>; Ahmad Al Dajani <AAIDajani@crowell.com>; Hill Brakefield
<hbrakefield@hausfeld.com>
Subject: RE: Dale - AT&T

Are there any other databases that would have relevant and responsive information?
We just want to be very clear about what is available and if anything is being withheld.

<image001.png>

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From: Horan, Theresa Cederroth <theresa.horan@kirkland.com>
Sent: Friday, September 27, 2024 4:23 PM
To: Swathi Bojedla <sbojedla@hausfeld.com>
Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>;
Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com
<OAntoine@crowell.com>; Ahmad Al Dajani <AAIDajani@crowell.com>; Hill Brakefield
<hbrakefield@hausfeld.com>
Subject: RE: Dale - AT&T

We have proposed what we believe are all of the relevant and responsive fields in
AT&T's subscriber database. If your experts believe there are categories of information
missing that you need, let us know and we can discuss further.

Thanks,

Theresa

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From: Swathi Bojedla <sbojedla@hausfeld.com>

Sent: Thursday, September 26, 2024 1:37 PM

To: Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>;
Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com
<OAntoine@crowell.com>; Ahmad Al Dajani <AAIDajani@crowell.com>; Hill Brakefield
<hbrakefield@hausfeld.com>

Subject: RE: Dale - AT&T

Theresa, our experts are reviewing the fields you provided, but at an initial glance, it seems highly unlikely that the small number of fields captures all of the information sought in our RFPs. Are you representing that you have disclosed all relevant and responsive fields, or are you withholding fields based on an objection? If so, we need to know what is being withheld based on what objection.

<image001.png>

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<image002.png>

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From: Horan, Theresa Cederroth <theresa.horan@kirkland.com>

Sent: Friday, September 20, 2024 8:30 PM

To: Swathi Bojedla <sbojedla@hausfeld.com>

Cc: Jordan Ludwig <JLudwig@crowell.com>; Roth, Martin L. <rothm@kirkland.com>; Bauer, Amie Marie <amie.bauer@kirkland.com>; *OAntoine@crowell.com <OAntoine@crowell.com>; Ahmad Al Dajani <AAlDajani@crowell.com>; Hill Brakefield <hbrakefield@hausfeld.com>

Subject: Dale - AT&T

Please see the attached letter and accompanying materials. Note that the data proposal is designated Outside Counsel Only / Highly Confidential.

Thank you.

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