

**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, and
T-MOBILE US, INC.,

Defendants.

Case No. 1:22-cv-03189

Hon. Thomas M. Durkin

Hon. Jeffrey Cole

**DECLARATION OF RENNER K. WALKER IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL AT&T TO PRODUCE DOCUMENTS
RESPONSIVE TO PLAINTIFFS' SUBPOENA**

I, Renner Walker, declare as follows:

1. I am admitted to the State Bars of California, Iowa (inactive), New Jersey, and New York, and am admitted *pro hac vice* in this case. I am a partner at the law firm of Hausfeld LLP, and Counsel for Plaintiffs in the above-captioned manner. I make this declaration in support of Plaintiffs' Motion to Compel AT&T Mobility LLC ("AT&T") to Produce Documents Responsive to Plaintiffs' Subpoena. I have personal knowledge of the facts set forth herein, and, if called as a witness, I could and would competently testify thereto.

2. On October 22, 2022, Plaintiffs subpoenaed AT&T for information relevant to Plaintiffs' claims and T-Mobile's anticipated defenses, including AT&T's monthly subscriber-level plan data ("structured data") for AT&T's U.S. retail mobile plan subscribers from January 1, 2010 to present.

3. On February 21, 2025, during negotiations for AT&T's structured data, AT&T emailed Plaintiffs an offer to produce structured data "kept in the ordinary course of business and that is reasonably accessible to it from January 1, 2018 . . . to the extent it is technically feasible to obtain all of those fields."¹

4. On February 28, 2025, Plaintiffs responded via email offering to shorten the relevant time period for Plaintiffs' structured data request by pushing the start date from January 1, 2010 to January 1, 2015.

5. AT&T never responded to Plaintiffs' compromise offer to produce structured data for the relevant time period as narrowed to January 1, 2015 to present.

6. On March 26, 2025, Plaintiffs sent questions to AT&T on AT&T's new data sample.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 18, 2025

Respectfully submitted,

/s/ Renner K. Walker
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*Co-Lead Class Counsel for Plaintiffs and the
Proposed Class*

¹ AT&T's February 21, 2025 letter and Plaintiffs' February 28, 2025 email discuss or touch on AT&T's data sample, which AT&T previously requested Plaintiffs treat as highly confidential – outside counsel only. Although Plaintiffs do not believe this correspondence has been marked confidential or highly confidential, Plaintiffs are not attaching the letter and email as exhibits out of an abundance of caution. Of course, Plaintiffs are happy to provide sealed copies of the correspondence at the Court's request.