

## **EXHIBIT B**

**From:** [Kevin Reiss](#)  
**To:** [Renner Walker](#); [Monica McCarroll](#); [Yin, Clifford](#)  
**Cc:** [Gary I. Smith, Jr.](#); [Swathi Bojedla](#); [Brendan P. Glackin](#); [Chan, Lin Y.](#); [Jose Roman Lavergne](#); [Shana Herman](#); [Hayden Dwyer](#); [Hazel Berkoh](#)  
**Subject:** RE: Dale v. Deutsche Telekom, No. 1:22-cv-03189 - Subpoena to DISH  
**Date:** Saturday, May 10, 2025 1:50:57 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[external.png](#)

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 External email >

Renner,

Thank you for these revised search terms. While DISH reiterates its position that custodial discovery is unduly burdensome for the reasons set forth in its opposition to Plaintiffs' Motion to Compel, DISH will continue to work with Plaintiffs towards reaching the "negotiated outcome [that] is more likely to give both sides at least a somewhat satisfactory resolution" (Dkt. 277). As discussed in the meet and confer, we do not expect to have a hit report for Plaintiffs' revised search terms until some point in the week of May 19. As you proposed in the call, we will let you know if the time needed by DISH to generate the hit report will require changing the date of our next meet and confer, currently scheduled for May 22, 2025, at 2:00 PM ET. We look forward to further discussions.

Best regards,

**KEVIN A. REISS**

COUNSEL | REDGRAVE LLP | (P) 202.641.3409

[kreiss@redgravellp.com](mailto:kreiss@redgravellp.com)

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**From:** Renner Walker <[rwalker@hausfeld.com](mailto:rwalker@hausfeld.com)>

**Sent:** Friday, May 9, 2025 7:46 PM

**To:** Kevin Reiss <[kreiss@redgravellp.com](mailto:kreiss@redgravellp.com)>; Monica McCarroll <[MMcCarroll@redgravellp.com](mailto:MMcCarroll@redgravellp.com)>; Yin, Clifford <[cyin@coblentzlaw.com](mailto:cyin@coblentzlaw.com)>

**Cc:** Gary I. Smith, Jr. <[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>; Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>; Brendan P. Glackin <[bglackin@lchb.com](mailto:bglackin@lchb.com)>; Chan, Lin Y. <[lchan@lchb.com](mailto:lchan@lchb.com)>; Jose Roman Lavergne <[jlavergne@hausfeld.com](mailto:jlavergne@hausfeld.com)>; Shana Herman <[sherman@hausfeld.com](mailto:sherman@hausfeld.com)>; Hayden Dwyer <[wdwyer@hausfeld.com](mailto:wdwyer@hausfeld.com)>; Hazel Berkoh <[hberkoh@hausfeld.com](mailto:hberkoh@hausfeld.com)>

**Subject:** [EXTERNAL] RE: Dale v. Deutsche Telekom, No. 1:22-cv-03189 - Subpoena to DISH

Kevin, Monica, and Cliff,

Thank you for the meet and confer today. Please see the attached revised search terms with

modifications to address the syntax issues you raised this afternoon. We have added a column to identify the changes with greater specificity, but generally speaking we: (1) changed any AROUND connector greater than 20 to AROUND(20), (2) removed third AROUND connectors from some search strings, (3) removed certain terms like “DISH” from certain search term strings, and (4) further disaggregated the search term strings for Request No. 7 to help identify search terms generating high hit counts.

We look forward to receiving your revised hit count report.

Kind regards,

Renner

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**RENNER WALKER**

Partner

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

[+1 \(646\) 362-3075](tel:+16463623075) direct

*Pronouns: he/him/his*

# HAUSFELD

33 Whitehall Street

14th Floor

New York, NY 10004

+1 646 357 1100

[hausfeld.com](http://hausfeld.com)

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**From:** Renner Walker <[rwalker@hausfeld.com](mailto:rwalker@hausfeld.com)>

**Sent:** Thursday, May 8, 2025 5:24 PM

**To:** Kevin Reiss <[kreiss@redgravellp.com](mailto:kreiss@redgravellp.com)>; Monica McCarroll <[mmccarroll@redgravellp.com](mailto:mmccarroll@redgravellp.com)>; Yin, Clifford <[cycin@coblenzlaw.com](mailto:cycin@coblenzlaw.com)>

**Cc:** Gary I. Smith, Jr. <[GSmith@hausfeld.com](mailto:GSmith@hausfeld.com)>; Swathi Bojedla <[sbojedla@hausfeld.com](mailto:sbojedla@hausfeld.com)>; Brendan P. Glackin <[bglackin@lchb.com](mailto:bglackin@lchb.com)>; Chan, Lin Y. <[lchan@lchb.com](mailto:lchan@lchb.com)>; Jose Roman Lavergne <[jlavergne@hausfeld.com](mailto:jlavergne@hausfeld.com)>; Shana Herman <[sherman@hausfeld.com](mailto:sherman@hausfeld.com)>; Hayden Dwyer <[wdwyer@hausfeld.com](mailto:wdwyer@hausfeld.com)>; Hazel Berkoh <[hberkoh@hausfeld.com](mailto:hberkoh@hausfeld.com)>

**Subject:** Dale v. Deutsche Telekom, No. 1:22-cv-03189 - Subpoena to DISH

Counsel,

While Plaintiffs maintain that our opening proposal on search terms and custodians is relevant and proportionate to the needs of the case, Plaintiffs attach a narrowed set of search terms for your consideration.

Plaintiffs have made four categories of changes throughout the search term proposal. First, Plaintiffs have replaced certain “AND” and “OR” connectors with proximity connectors. Second, Plaintiffs have eliminated entirely certain terms from individual search term strings. Third, Plaintiffs have reformulated certain search term strings because they were generating a high number of hits. This is primarily true of Request No. 20, but Plaintiffs also reformulated the search terms for Request Nos. 6, 13, 15 and 23. Plaintiffs are happy to discuss those reformulations further on our next meet and confer. Fourth, Plaintiffs have disaggregated prior strings into series of narrower sub-strings, which will better isolate for further refinement the specific strings or terms generating high hit counts. Plaintiffs are still formulating a narrowed set of search terms for Mr. Ergen and will circulate search terms for Mr. Ergen separately; for present purposes, Plaintiffs propose these be run only across the other seven custodial files.

Cordially,

Renner

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**RENNER WALKER**

Partner

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

[+1 \(646\) 362-3075](tel:+16463623075) direct

*Pronouns: he/him/his*

# HAUSFELD

33 Whitehall Street

14th Floor

New York, NY 10004

+1 646 357 1100

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