

**From:** [Lien, David](#)  
**To:** [DishvMindGeek](#)  
**Subject:** Fwd: DISH v WGCZ - Complaint and Waiver of Service  
**Date:** Wednesday, August 30, 2023 11:25:01 PM

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Regards,

David

Begin forwarded message:

**From:** Michael T Zeller  
**Date:** August 30, 2023 at 9:15:51 PM PDT  
**To:** "Lien, David"  
**Cc:** "Dhanani, Ali" , Chris Mathews  
**Subject:** Re: DISH v WGCZ - Complaint and Waiver of Service

[EXTERNAL EMAIL]

Hi David, thank you for your email and thank you for your patience. WebGroup and NKL Associates are not amenable to agreeing to waiver of service. They are foreign corporations that are not subject to jurisdiction in Utah and therefore will need to be served pursuant to Hague Convention rules. Our clients reserve all rights.

[REDACTED]

Best.

On Aug 28, 2023, at 1:41 PM, Lien, David wrote:

[EXTERNAL EMAIL from [david.lien@bakerbotts.com](mailto:david.lien@bakerbotts.com)]

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Hi Michael,  
Hope you had a nice weekend. Following up on this. Have you discussed the waiver with your client?  
Regards,  
David

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**From:** Michael T Zeller  
**Sent:** Wednesday, August 23, 2023 6:57 PM  
**To:** Lien, David  
**Cc:** Dhanani, Ali ; Chris Mathews  
**Subject:** Re: DISH v WGCZ - Complaint and Waiver of Service

**[EXTERNAL EMAIL]**

Thank you for your email. We will discuss your request with our clients and revert. Best.

On Aug 23, 2023, at 7:08 PM, Lien, David  
<[david.lien@bakerbotts.com](mailto:david.lien@bakerbotts.com)> wrote:

**[EXTERNAL EMAIL from [david.lien@bakerbotts.com](mailto:david.lien@bakerbotts.com)]**

Counsel,

Dish has filed a Complaint against WebGroup Czech Republic, A.S. and NKL Associates, S.R.O. in the US District of Utah on August 22, 2023. A download link to the Complaint and attachments can be found below. Also attached to this email are 2 copies of the waiver form, as well as the formal Rule 4 Notice of Lawsuit and Request to Waive Service of Summons.

Pursuant to FRCP 4, please confirm whether you will waive service of this Complaint. As a reminder, waiver of service grants additional time to answer the Complaint under Fed. R. Civ. P. 4(d)(3).

**David Lien**

*Intellectual Property Senior Associate*

Baker Botts L.L.P.  
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