EXHIBIT AA

ORRICK

Subroto Bose
(650) 614-7669
sbose@orrick.com

August 3, 2006

VIA FACSIMILE AND U.S. MAIL

Sally Wiggins, Esq.
Robert P. Greenspoon, Esq.
Niro, Scavone, Haller & Niro
181 West Madison Street, Suite 4600
Chicago, IL 60602-4515

Re: Alcatel USA Resources, Inc., et al. v. Foundry Networks, Inc.
USDC-Delaware, Action No. 05-418 SLR

Dear Sally and Rob:

I am writing to follow up on my earlier letter to you on August 1, 2006, requesting that you confirm Mr. Scot A. Reader's availability for a deposition on either August 18, or August 21, 2006. In that letter we also indicated that Foundry believes that time is of the essence with regard to scheduling Mr. Reader's deposition, and asked that you confirm one of these dates by August 2, 2006.

As you have not responded to our letter, we have served a subpoena on Mr. Reader requiring him to appear for a deposition on August 18. Foundry would prefer to reach an agreement on a date for Mr. Reader's deposition and remains open to scheduling the deposition on one of the above dates. We request that you inform us by August 8, 2006, if Mr. Reader would prefer the deposition be scheduled for August 21 instead.

Very truly yours,

Subroto Bose

EXHIBIT BB

NIRO, SCAVONE, HALLER & NIRO

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ROBERT A. CONLEY
ERIC J. MERSMANN

August 4, 2006

Via Facsimile (650) 614-7401

Subroto Bose
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025

Re: Alcatel v. Foundry Networks

Dear Mr. Bose:

Mr. Reader is available for a deposition in Chicago on September 8, 2006.

Very truly yours,

Sally Wiggins

SW/amr

NIRO, SCAVONE, HALLER & NIRO

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August 6, 2006

Via Facsimile (650) 614-7401

Subroto Bose
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025

Re: Alcatel v. Foundry Networks

Dear Mr. Bose:

We are in receipt of your various correspondence on the issue of Foundry seeking a deposition of non-party Attorney Scot Reader. In one of your letters you provide less than 24 hours for us to contact Mr. Reader to attempt to get dates for a deposition and respond to Foundry. In the same letter, you propose dates and then issue a subpoena the next day for different dates altogether.

As for Foundry's demand for a date earlier than September 8 date proposed, Foundry has been aware of Attorney Scot Reader from at least May 11, 2006, the date Foundry served a subpoena for documents (although a defective one) on Mr. Reader. Foundry served a second subpoena on Mr. Reader on June 21, 2006. Mr. Reader is not a party to this case nor is he an employee of any party. Moreover, Mr. Reader is currently on a scheduled vacation. Therefore, any urgency that exists has been caused by Foundry.

Next, although Mr. Reader's objections are not yet due, please be advised that Mr. Reader objects to the appropriateness of Foundry's subpoena at all. As Foundry knows, Mr. Reader is an attorney. Mr. Reader will not be testifying about privileged communication. Foundry's open ended subpoena is simply too broad. In this regard, in an attempt to meet and confer on narrowing the scope of Mr. Reader's deposition, please provide the topics on which Foundry intends to question Mr. Reader during any deposition so we can evaluate whether a protective order will be necessary. We look forward to your response. In the interim, I will continue to attempt to contact Mr. Reader regarding

alternative dates with the belief that Foundry will narrow the scope of the subpoena. Of course, if we do not reach agreement on the scope of the subpoena, Mr. Reader reserves the right to seek a Protective Order.

Very truly yours,

Sally Wiggins

SW/amr

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August 14, 2006

Via Facsimile (650) 614-7401

Subroto Bose
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025

Re: Alcatel v. Foundry Networks

Dear Mr. Bose:

I am writing to follow up on my voicemail regarding the subpoena for deposition served on Scot Reader. We proposed an alternate date and requested Foundry to define with more particularity the scope of the deposition in light of Mr. Reader's role as an attorney. If we do not reach agreement on the above we will need to file a motion with the Court for a protective order. I am hoping that we can confer on the issue today or tomorrow.

Very truly yours,

Sally Wiggins

SW/amr

EXHIBIT CC

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July 19, 2006

Via FedEx

Philip A. Rovner
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Matthew H. Poppe
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025

Re: Alcatel v. Foundry Networks

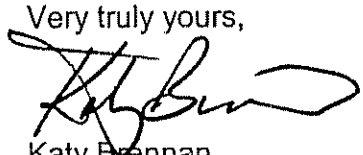
Dear Gentlemen:

Enclosed please find a cd produced on behalf of third parties Christie, Parker & Hale and Fulbright & Jaworski, as well as additional production by Alcatel. The ranges being produced are as follows:

CPH00001-CPH01129
FJ00001-FJ00329
ALCATEL153310-ALCATEL153492.

This cd and its contents have been designated with confidentiality where appropriate and according to the provisions of the Protective Order. Please acknowledge your agreement to also treat third party production as confidential pursuant to the Protective Order. If you have any questions, please feel free to contact me.

Very truly yours,



Katy Brennan
Paralegal - Niro, Scavone, Haller & Niro

Enclosure: as listed above

EXHIBIT DD

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August 21, 2006

Via Facsimile

Philip A. Rovner
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Matthew H. Poppe
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025
(650) 614-7401

Re: Alcatel v. Foundry Networks

Dear Gentlemen:

It has come to our attention that the CD produced on July 19, 2006 including Bates numbers CPH00001-CPH01129, FJ00001-FJ00329, ALCATEL153310-ALCATEL153492 inadvertently includes privileged information, as well as mis-designated documents. We believe when the CD was burned those documents were mistakenly included on the disk and/or were mis-designated.

Please return to us the CD produced on July 19, 2006 and any documents printed from that CD, and destroy any soft copies of documents saved from that CD. We will provide a replacement CD in the next day or two.

Thank you for your cooperation.

Very truly yours,

Kara Szpondowski

Kara L. Szpondowski

EXHIBIT EE

NIRO, SCAVONE, HALLER & NIRO

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July 10, 2006

Via Facsimile (650) 614-7401
Matthew Poppe
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025

Re: Alcatel v. Foundry Networks

Dear Matt:

This is further follow up on Foundry's request to take the deposition of the named inventors.

Inventor Bart Pauwels

Mr. Pauwels resides in Belgium. Mr. Pauwels is not an employee of Alcatel Internetworking or Alcatel US Resources. Notwithstanding this, he and his employer have agreed to produce Mr. Pauwels for his deposition. The question is where? If Foundry is willing to pay for Mr. Pauwels travel and hotel expenses, he is willing to travel to Chicago for his deposition. If not, Mr. Pauwels will be produced for his deposition in Belgium where he resides and works. We will obtain proposed dates once we know where the deposition will occur. Please advise.

Inventor Michel Henrion

We continue to represent Mr. Henrion who is a resident of France. Mr. Henrion is retired and no longer an employee of any Alcatel entity. Mr. Henrion will not voluntarily appear for a deposition.

Sincerely,

Sally Wiggins

SW/amr

EXHIBIT FF

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July 18, 2006

Via Facsimile (650) 614-7401
Matthew Poppe
ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
Menlo Park, CA 94025

Re: Alcatel v. Foundry Networks

Dear Matt:

We are in receipt of your letter raising issues regarding the deposition of Inventor Michel Henrion.

Inventor Michel Henrion

As Foundry is aware from prior correspondence, the patents in suit and Alcatel's Rule 26(a) disclosure, Mr. Henrion is a resident of France. Mr. Henrion is no longer employed by Alcatel and as such Alcatel cannot make him do anything. We continue to try to gain Mr. Henrion's cooperation to voluntarily appear for a deposition to allow Foundry to forgo the Hague convention. Thank you for agreeing to take his deposition in France. If we are able to gain Mr. Henrion's voluntary cooperation for a deposition, we will advise Foundry. In the interim, we understand that Foundry may decide to pursue trying to obtain Mr. Henrion's deposition through the Hague.

Please be advised however that Mr. Henrion remains represented by us in this manner.

Very truly yours,

Sally Wiggins

SW/amr