EXHIBIT A

CONFIDENTIAL TECHNICAL INFORMATION, ATTORNEYS-EYES-0NLY; SUBJECT TO PROTECTIVE ORDER IN ALCATEL V. FOUNDRY, CASE NO. 05-418 SLR

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ALCATEL USA RESOURCES, INC., a Delaware Corporation, and ALCATEL INTERNETWORKING, INC., a California Corporation,	)	
Plaintiffs,	)	Civil Action No. 1:05 CV 418
v.	)	
FOUNDRY NETWORKS, INC., a Delaware Corporation,	)	
Defendant.	)	

ALCATEL'S SUPPLEMENTAL RESPONSE TO FOUNDRY'S FIRST SET OF INTERROGATORIES REGARDING PLAINTIFF'S COUNT I (NOS. 1-6)

Plaintiff Alcatel USA Resources, Inc. (herein "Alcatel" or "Alcatel USA"), hereby submits its objections and supplemental responses to the First Set of Interrogatories Regarding Plaintiff's Count I (Nos. 1-7) propounded by Foundry Networks, Inc. ("Foundry"), as follows. While the interrogatories appear directed to both plaintiffs regarding Count I, that was clearly in-error since Alcatel Internetworking, Inc. is not the plaintiff for Count I.

GENERAL OBJECTIONS

Alcatel restates and incorporates by reference all previous objections to these interrogatories. By agreeing to supplement as considered below, Alcatel does not acknowledge it was required to supplement.

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INTERROGATORIES

Interrogatory No. 1

Identify all Foundry products that Alcatel contends infringe the patents in suit including which specific claims are infringed by each Foundry product identified.

Response:

Subject to the General Objections, and subject to supplementation upon receipt and analysis of Foundry discovery, see the claim charts attached hereto. Alcatel reserves the right to supplement this answer for any reason, including in response to receipt of additional discovery, in response to retained expert review of any discovery, or in response to claim interpretation orders.

Supplemental Response:

Discovery is continuing, Alcatel's review of Foundry-produced discovery is continuing (e.g., very recently produced source code), and Alcatel's expert review has not yet commenced. Nonetheless, Alcatel refers to the following chart to show that the named products and product lines possess the features which cause the infringement which were identified in the previously-served claim charts. This list of model numbers supersedes the previous list of model numbers.

Note: Alcatel awaits production of further response on the following products: AccessIron, MetroRouter, and Workgroup Switch in order to supply more information on infringement contentions against those products.

Model #s	Patent	Bates ID	Doc	Date
AR1202-E	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1202-E-VPN	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1202-T	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04

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AR1202-T-VPN	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1204-E	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1204-E-VPN	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1204-T	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1204-T-VPN	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1208-E	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1208-T	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1216-E	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR1216-T	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR3201-T-CH	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR3201-T-CL	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR3202-T-CH	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
AR3202-T-CL	840	FN A_00350963	AR-Series Release Notes Release 8.0	Jul-04
BigIron 15000	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
BigIron 15000	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron 15000	329	FN A_00082616	Foundry NetIron Service Provider Configuration and Management Guide	Jul-05
BigIron 15000	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
BigIron 15000	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron 15000	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron 4000	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05

BigIron 4000	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron 4000	329	FN A_00082616	Foundry NetIron Service Provider Configuration and Management Guide	Jul-05
BigIron 4000	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
BigIron 4000	840	FN A_00144950	Foundry ServerIron Installation and Configuration Guide	Sep-00
BigIron 4000	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron 4000	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron 8000	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
BigIron 8000	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron 8000	329	FN A_00082616	Foundry NetIron Service Provider Configuration and Management Guide	Jul-05
BigIron 8000	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
BigIron 8000	840	FN A_00144950	Foundry ServerIron Installation and Configuration Guide	Sep-00
BigIron 8000	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron 8000	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron MG8	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron MG8	192	FNA_00354630	Release Notes for Terathon IronWare Software Release 02.2.01	Sep-05
BigIron MG8	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron MG8	840	FNA_00354630	Release Notes for Terathon IronWare Software Release 02.2.01	Sep-05
BigIron MG8	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
BigIron MG8	090	FNA_00354630	Release Notes for Terathon IronWare Software Release 02.2.01	Sep-05

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BigIron MG8	090	FNA_00354630	Release Notes for Terathon IronWare Software Release 02.2.01	Sep-05
BigIron RX - 16	192	FNA_00382797	July Field Training	Jul-05
BigIron RX - 16	840	FNA_00382797	July Field Training	Jul-05
BigIron RX - 16	090	FNA_00382797	July Field Training	Jul-05
BigIron RX - 4	192	FNA_00382797	July Field Training	Jul-05
BigIron RX - 4	840	FNA_00382797	July Field Training	Jul-05
BigIron RX - 4	090	FNA_00382797	July Field Training	Jul-05
BigIron RX - 8	192	FNA_00382797	July Field Training	Jul-05
BigIron RX - 8	840	FNA_00382797	July Field Training	Jul-05
BigIron RX - 8	090	FNA_00382797	July Field Training	Jul-05
BigIron Chassis devices with IronCore or JetCore management modules	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
BigIron with Velocity Management Module version I (VM1)	192	FN A_00079230	Foundry Security Guide	Jul-05
BigIron with Velocity Management Module version I (VM1)	090	FN A_00079230	Foundry Security Guide	Jul-05
BigIron: modles for layer-2/layer-3 switching for data centers as well as large campus networks.	192	FN A_00163046	JetCoreTM Based Chassis Systems	Jun-05
EdgeIron 2402CF	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 2402CF	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 2402CF	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 24G	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 24G	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 24G	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 24G-A	192	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04

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EdgeIron 24G-A	840	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 24G-A	090	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 24GS	192	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 24GS	192	FNA_00382797	July Field Training	Jul-05
EdgeIron 24GS	840	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 24GS	840	FNA_00382797	July Field Training	Jul-05
EdgeIron 24GS	090	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 24GS	090	FNA_00382797	July Field Training	Jul-05
EdgeIron 4802CF	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 4802CF	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 4802CF	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
EdgeIron 48G	192	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 48G	840	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 48G	090	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04

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EdgeIron 48GS	192	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 48GS	192	FNA_00382797	July Field Training	Jul-05
EdgeIron 48GS	840	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 48GS	840	FNA_00382797	July Field Training	Jul-05
EdgeIron 48GS	090	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 48GS	090	FNA_00382797	July Field Training	Jul-05
EdgeIron 8X10G	192	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 8X10G	192	FNA_00382797	July Field Training	Jul-05
EdgeIron 8X10G	840	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 8X10G	840	FNA_00382797	July Field Training	Jul-05
EdgeIron 8X10G	090	FN A_00355006	Release Notes EdgeIron 24GS, 48GS, 24G-A, 48G and 8X10G Releases 2.2.4.21	Nov-04
EdgeIron 8X10G	090	FNA_00382797	July Field Training	Jul-05
FastIron 1500	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FastIron 1500	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
FastIron 1500	192	FN A_00079230	Foundry Security Guide	Jul-05
FastIron 1500	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron 1500	329	FN A_00082616	Foundry NetIron Service Provider Configuration and Management Guide	Jul-05
FastIron 1500	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03

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FastIron 1500	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron 1500	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FastIron 1500	090	FN A_00067043	Release Notes for IronWare Software Release 07.8.01	Oct-04
FastIron 1500	090	FN A_00079230	Foundry Security Guide	Jul-05
FastIron 400	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FastIron 400	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
FastIron 400	192	FN A_00079230	Foundry Security Guide	Jul-05
FastIron 400	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron 400	329	FN A_00082616	Foundry NetIron Service Provider Configuration and Management Guide	Jul-05
FastIron 400	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FastIron 400	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron 400	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FastIron 400	090	FN A_00067043	Release Notes for IronWare Software Release 07.8.01	Oct-04
FastIron 400	090	FN A_00079230	Foundry Security Guide	Jul-05
FastIron 800	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FastIron 800	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
FastIron 800	192	FN A_00079230	Foundry Security Guide	Jul-05
FastIron 800	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron 800	329	FN A_00082616	Foundry NetIron Service Provider Configuration and Management Guide	Jul-05
FastIron 800	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03

FastIron 800	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron 800	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FastIron 800	090	FN A_00067043	Release Notes for IronWare Software Release 07.8.01	Oct-04
FastIron 800	090	FN A_00079230	Foundry Security Guide	Jul-05
FastIron SuperX	840	FN A_00360372	Release Notes for IronWare Software Release 02.1.00 FastIron SuperX TurboIron SuperX	Mar-05
FastIron SuperX	090	FN A_00360372	Release Notes for IronWare Software Release 02.1.00 FastIron SuperX TurboIron SuperX	Mar-05
FastIron 4802	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
FastIron 4802	192	FN A_00079230	Foundry Security Guide	Jul-05
FastIron 4802	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron 4802	329	FN A_00082616	Foundry Netlron Service Provider Configuration and Management Guide	Jul-05
FastIron 4802	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron 4802	090	FN A_00067043	Release Notes for IronWare Software Release 07.8.01	Oct-04
FastIron 4802	090	FN A_00079230	Foundry Security Guide	Jul-05
FastIron II	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
FastIron II	192	FN A_00079230	Foundry Security Guide	Jul-05
FastIron II	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron II	329	FN A_00082616	Foundry Netlron Service Provider Configuration and Management Guide	Jul-05
FastIron II	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05

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FastIron II	090	FN A_00067043	Release Notes for IronWare Software Release 07.8.01	Oct-04
FastIron II	090	FN A_00079230	Foundry Security Guide	Jul-05
FastIron II Plus	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
FastIron II Plus	192	FN A_00079230	Foundry Security Guide	Jul-05
FastIron II Plus	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron II Plus	329	FN A_00082616	Foundry Netlron Service Provider Configuration and Management Guide	Jul-05
FastIron II Plus	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron II Plus	090	FN A_00067043	Release Notes for IronWare Software Release 07.8.01	Oct-04
FastIron II Plus	090	FN A_00079230	Foundry Security Guide	Jul-05
FastIron III	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
FastIron III	192	FN A_00079230	Foundry Security Guide	Jul-05
FastIron III	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron III	329	FN A_00082616	Foundry Netlron Service Provider Configuration and Management Guide	Jul-05
FastIron III	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
FastIron III	090	FN A_00067043	Release Notes for IronWare Software Release 07.8.01	Oct-04
FastIron III	090	FN A_00079230	Foundry Security Guide	Jul-05
FastIron: models for layer-2/layer-3 switching for enterprise applications.	192	FN A_00163046	JetCoreIM Based Chassis Systems	Jun-05
FES 12GCF	192	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05
FES 12GCF	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 12GCF	840	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05

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FES 12GCF	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 12GCF	090	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05
FES 12GCF	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402	192	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 2402	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402	840	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 2402	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402	090	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 2402	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402 - POE	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402 - POE	192	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05
FES 2402 - POE	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402 - POE	840	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05
FES 2402 - POE	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 2402 - POE	090	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05
FES 4802	192	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 4802	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03

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FES 4802	840	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 4802	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 4802	090	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 4802	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 4802-POE	192	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05
FES 4802-POE	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 4802-POE	840	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05
FES 4802-POE	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 4802-POE	090	FN A_00064809	Release Notes for IronWare Software Release 03.4.01	Sep-05
FES 4802-POE	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 9604	192	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 9604	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 9604	840	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 9604	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES 9604	090	FN A_00056579	Release Notes for IronWare Software Release 02.0.00 FastIron Edge Switch	Jan-03
FES 9604	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FES X424	192	FNA_00382797	July Field Training	Jul-05
FES X424	840	FNA_00382797	July Field Training	Jul-05
FES X424	090	FNA_00382797	July Field Training	Jul-05
FES X424HF	192	FNA_00382797	July Field Training	Jul-05
FES X424HF	840	FNA_00382797	July Field Training	Jul-05
FES X424HF	090	FNA_00382797	July Field Training	Jul-05
FES X424-POE	192	FNA_00382797	July Field Training	Jul-05
FES X424-POE	840	FNA_00382797	July Field Training	Jul-05
FES X424-POE	090	FNA_00382797	July Field Training	Jul-05

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FES X448	192	FNA_00382797	July Field Training	Jul-05
FES X448	840	FNA_00382797	July Field Training	Jul-05
FES X448	090	FNA_00382797	July Field Training	Jul-05
FWS 4802	192	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FWS 4802	840	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FWS 4802	090	FN A_00377503	Foundry's Layer 2 / Layer 3 Enterprise Solution	Jan-03
FWS X424	192	FNA_00382797	July Field Training	Jul-05
FWS X424	840	FNA_00382797	July Field Training	Jul-05
FWS X424	090	FNA_00382797	July Field Training	Jul-05
NetIron 1500	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 1500	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 1500	329	FN A_00082616	Foundry Netlron Service Provider Configuration and Management Guide	Jul-05
NetIron 1500	329	FN A_00082616	Foundry Netlron Service Provider Configuration and Management Guide	Jul-05
NetIron 1500	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 1500	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 2402	192	FN A_00382989	NetIron IMR 640	Jun-05
NetIron 2402	329	FN A_00382989	NetIron IMR 640	Jun-05
NetIron 2402	840	FN A_00382989	NetIron IMR 640	Jun-05
NetIron 400	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 400	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 400	329	FN A_00082616	Foundry Netlron Service Provider Configuration and Management Guide	Jul-05
NetIron 400	329	FN A_00082616	Foundry Netlron Service Provider Configuration and Management Guide	Jul-05
NetIron 400	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05

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NetIron 400	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 40G	192	FNA_00354630	Release Notes for Terathon IronWare Software Release 02.2.01	Sep-05
NetIron 40G	840	FNA_00354630	Release Notes for Terathon IronWare Software Release 02.2.01	Sep-05
NetIron 40G	090	FNA_00354630	Release Notes for Terathon IronWare Software Release 02.2.01	Sep-05
NetIron 40G	090	FNA_00354630	Release Notes for Terathon IronWare Software Release 02.2.01	Sep-05
NetIron 4802	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 4802	329	FN A_00082616	Foundry NetIron Service Provider Configuration and Management Guide	Jul-05
NetIron 4802	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 800	192	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron 800	329	FN A_00082616	Foundry NetIron Service Provider Configuration and Management Guide	Jul-05
NetIron 800	840	FN A_00079430	Foundry Switch and Router Command Line Interface Reference	Jul-05
NetIron IMR 640	192	FN A_00382989	NetIron IMR 640	Jun-05
NetIron IMR 640	329	FN A_00382989	NetIron IMR 640	Jun-05
NetIron IMR 640	840	FN A_00382989	NetIron IMR 640	Jun-05
NetIron MLX	192	FN A_00395966	Foundry NetIron XMR/MLX Configuration Guide	Feb-06
NetIron MLX	329	FN A_00395966	Foundry NetIron XMR/MLX Configuration Guide	Feb-06
NetIron MLX	840	FN A_00395966	Foundry NetIron XMR/MLX Configuration Guide	Feb-06
NetIron XMR 16000	192	FNA_00382797	July Field Training	Jul-05
NetIron XMR 16000	329	FNA_00382797	July Field Training	Jul-05
NetIron XMR 16000	840	FNA_00382797	July Field Training	Jul-05
NetIron XMR 16000	090	FNA_00382797	July Field Training	Jul-05
NetIron XMR 4000	192	FNA_00382797	July Field Training	Jul-05

NetIron XMR 4000	329	FNA_00382797	July Field Training	Jul-05
NetIron XMR 4000	840	FNA_00382797	July Field Training	Jul-05
NetIron XMR 4000	090	FNA_00382797	July Field Training	Jul-05
NetIron XMR 8000	192	FNA_00382797	July Field Training	Jul-05
NetIron XMR 8000	329	FNA_00382797	July Field Training	Jul-05
NetIron XMR 8000	840	FNA_00382797	July Field Training	Jul-05
NetIron XMR 8000	090	FNA_00382797	July Field Training	Jul-05
NetIron Chassis devices with IronCore or JetCore management modules	192	FN A_00064191	Release Notes for IronWare Software Release 07.6.03	May-03
NetIron Internet Backbone router	192	FN A_00079230	Foundry Security Guide	Jul-05
NetIron Internet Backbone router	090	FN A_00079230	Foundry Security Guide	Jul-05
NetIron: modles for layer-2/layer-3 and MPLS switching for service providers, and wide area network backbones.	192	FN A_00163046	JetCoreTM Based Chassis Systems	Jun-05
ServerIron 450	840	FN A_00056857	Release Notes for ServerIron IronWare Software Release 09.2.00S	Oct-04
ServerIron 850	840	FN A_00056857	Release Notes for ServerIron IronWare Software Release 09.2.00S	Oct-04
ServerIron GT E10Gx2	840	FN A_00056857	Release Notes for ServerIron IronWare Software Release 09.2.00S	Oct-04
ServerIron GT EGx2	840	FN A_00056857	Release Notes for ServerIron IronWare Software Release 09.2.00S	Oct-04
ServerIron GT EGx4	840	FN A_00056857	Release Notes for ServerIron IronWare Software Release 09.2.00S	Oct-04
ServerIron XL	840	FN A_00144950	Foundry ServerIron Installation and Configuration Guide	Sep-00
ServerIron XL	840	FN A_00380971	URL Switching with ServerIron	
ServerIron XL/G	840	FN A_00144950	Foundry ServerIron Installation and Configuration Guide	Sep-00
ServerIron XL/TCS	840	FN A_00144950	Foundry ServerIron Installation and Configuration Guide	Sep-00

ServerIron 100	840	FN A_00056857	Release Notes for ServerIron IronWare Software Release 09.2.00S	Oct-04
ServerIron 400	840	FN A_00056857	Release Notes for ServerIron IronWare Software Release 09.2.00S	Oct-04
ServerIron 800	840	FN A_00056857	Release Notes for ServerIron IronWare Software Release 09.2.00S	Oct-04
TurboIron SuperX	840	FN A_00360372	Release Notes for IronWare Software Release 02.1.00 FastIron SuperX TurboIron SuperX	Mar-05
TurboIron SuperX	090	FN A_00360372	Release Notes for IronWare Software Release 02.1.00 FastIron SuperX TurboIron SuperX	Mar-05

Alcatel intends to continue to supplement this interrogatory answer as appropriate.

Interrogatory No. 2

State in a chart how each Foundry product identified in Interrogatory No. 1 infringes each of the corresponding claims. These charts should: A) identify specifically where each element of each asserted claim is found within each Foundry product; B) identify for each asserted claim element that Alcatel contends is a means-plus-function element governed by 35 U.S.C. §112(6), the structures, acts, or materials in each Foundry product that performs the claimed function; and C) state whether each element of each asserted claim is literally present or present under the doctrine of equivalents.

Response:

Subject to the General Objections, and subject to supplementation upon receipt and analysis of Foundry discovery, see the claim charts attached hereto. Alcatel reserves the right to supplement this answer for any reason, including in response to receipt of additional discovery, in response to retained expert review of any discovery, or in response to claim interpretation orders.

The charts should be understood as pointing out particular evidence of both literal infringement and doctrine of equivalents infringement. That is, if any claim element is held or argued to be literally absent, then the Alcatel charts should be interpreted as identifying with specificity and particularity on an element-by-element basis what structures or acts associated with the accused Foundry products embody a substantial equivalent of such claim element. That is, the charts identify what structures or acts are only insubstantially different from the scope of the respective claim elements, if different at all. Alcatel reserves the right to provide additional doctrine of equivalents information if Foundry ever articulates a comprehensible argument attempting to rebut literal infringement.

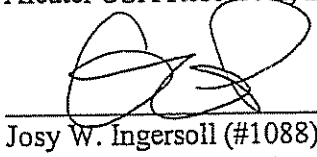
Supplemental Response:

The chart in the supplemental response to Interrogatory No. 1 contains information showing which model numbers contain the features subjecting them to the infringement contentions outlined in the previously-served claim charts.

[redacted]

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CERTIFICATE OF SERVICE

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EXHIBIT B

Comparison of Claims 1, 2, 4, and 16 of Henrion U.S. Patent No. 5,301,192 entitled TEMPORARY INFORMATION STORAGE SYSTEM COMPRISING A BUFFER MEMORY STORING DATA STRUCTURED IN FIXED OR VARIABLE LENGTH DATA BLOCK
With Foundry EdgeIron, ServerIron, NetIron, BigIron, and FastIron products – see Attachment "Model Numbers" for additional specifics

1. Temporary information storage system comprising	Per White Paper: JetCore Based Chassis Systems - 2003 "The new JetCore chipset represents the third generation of ASICs created by Foundry Networks." "Foundry's chassis systems include three series: • FastIron: aimed at high performance layer-2/layer-3 switching for enterprise applications. • BigIron: aimed at high performance layer-2/layer-3 switching for data centers as well as large campus networks. • NetIron: aimed at high performance layer-2/layer-3 and MPLS switching for service providers, and wide area network backbones. All of the chassis series above are capable of leveraging the new JetCore architecture ...." At FN A 00163049. "[T]he systems place the intelligent packet forwarding functions on the interface modules, i.e., all the interface modules incorporate their own switching engines, buffers, queues, and switching fabrics." At FN A 00163051 "The "BigIron Architecture Brief" white paper describes the high level architecture of Foundry's interface modules as per the 2nd generation chipset. The 3rd generation chipset, described here, consolidates all the required functions as well as some new functions into fewer ASICs to provide higher port density, reliability, cost savings, and added functionality." At FN A 00163051 Note: The "BigIron Architecture Technical Brief – 1999 FN A_00045748 describes the prior system which shares the same architecture and methods (switching engines, buffers, queues, and switching fabrics, etc). Similar quotes can be found there.
a buffer memory storing data structured as fixed or variable length blocks of data, each of said data blocks comprising one or more data elements, and	"The shared memory buffer pool provides storage for the received packet(s) till it is time to the send the packet out ...." At FN A 00163059

Comparison of Claims 1, 2, 4, and 16 of Henrion U.S. Patent No. 5,301,192 entitled TEMPORARY INFORMATION STORAGE SYSTEM COMPRISING A BUFFER MEMORY STORING DATA STRUCTURED IN FIXED OR VARIABLE LENGTH DATA BLOCK
With Foundry Edgelron, Serverlron, Netlron, Biglron, and Fastlron products – see Attachment "Model Numbers" for additional specifics

a data block and outlet selection queue management logic comprising	"The buffer manager is responsible for managing the packet storage space inside the shared memory." Id. "Under the control of the buffer manager, the shared memory switch fabric, also, retrieves packets from the shared memory and sends them to their destination ports, as instructed by the buffer manager." At FN A 00163059
a plurality of queues for interlinking each of the data blocks to a respective destination of a plurality of destinations, such that when a data block is assigned to a destination it is sufficient to write its identity in the respective queue specific to this destination, and	"When the buffer manager is notified of the buffer number of a new packet in the shared memory, the buffer manager assigns the buffer number to the appropriate queue based on the packet's destination and priority." Id. "Foundry's architecture offers 4 queues per destination to allow up to 4 levels of traffic prioritization. The architecture honors those priority levels, and schedules service for the prioritized traffic flows through the use of: • 4 output queues per physical port within the same port group • 4 output queues per neighboring port group • 4 output queues per neighboring interface module" At FN A 00163062 and FN A 00163063 Note: In the Foundry device, a data block's identity is its buffer number
data block selection means for assigning each of said data blocks to a respective individual outlet of a respective plurality of outlets associated with said respective destination, said data block selection means further comprising	"When a packet reaches the head of its queue, the buffer manager instructs the shared memory switch fabric as to where to retrieve the packet from the shared memory (using the buffer number), and which physical port to send it to." At FN A 00163059 Note: In the Foundry device, a data block's destination is its destination port.

Comparison of Claims 1, 2, 4, and 16 of Henrion U.S. Patent No. 5,301,192 entitled TEMPORARY INFORMATION STORAGE SYSTEM COMPRISING A BUFFER MEMORY STORING DATA STRUCTURED IN FIXED OR VARIABLE LENGTH DATA BLOCK
With Foundry EdgeIron, ServerIron, NetIron, BigIron, and FastIron products – see Attachment "Model Numbers" for additional specifics

first means for identifying a specific said queue associated with said respective destination with which said respective individual outlet is associated,	"The fabric ... reports the following information to the buffer manager: Buffer number - where the packet is stored Forwarding Identifier (FID) ...." "The buffer manager uses the above information to determine the location of the packet in the shared memory, ... the destination(s) of the packet, and consequently, which queue(s) it ... [is] placed on." At FN A 00163058 Note: In the Foundry device, the CAM & PRAM translate a destination port which implies a specific outlet and its associated queue. "The content addressable memory (CAM) is used by the packet classifier to provide reverse lookups based on the content of the packet. The packet classifier extracts a portion(s) of the packet headers - such as destination IP address, destination MAC address, source and destination IP addresses, etc. - and hands it over to the high speed CAM to perform a lookup. In case a match is found, the CAM returns an index of a location in the PRAM, where information on how to forward the packet is stored. The PRAM is a high speed memory that takes the index returned by the CAM lookup and returns to the packet classifier information on how to forward the packet: FID (destination port or ports), MAC address of next hop, VLAN ID that should be attached to the packet as it goes out a given interface, etc. The information retrieved by the PRAM is used to build the internal Foundry header that gets attached to the packet. This information is used by other modules of the hardware to determine how to forward the packet." At FN A 00163060
second means for obtaining from said specific queue an address of said each data block and	"When a packet reaches the head of its queue, the buffer manager instructs the shared memory switch fabric as to where to retrieve the packet from the shared memory (using the buffer number),..." At FN A 00163059

Comparison of Claims 1, 2, 4, and 16 of Henrion U.S. Patent No. 5,301,192 entitled TEMPORARY INFORMATION STORAGE SYSTEM COMPRISING A BUFFER MEMORY STORING DATA STRUCTURED IN FIXED OR VARIABLE LENGTH DATA BLOCK
With Foundry EdgeIron, ServerIron, NetIron, BigIron, and FastIron products – see Attachment "Model Numbers" for additional specifics

third means for transferring said each data block to said respective individual outlet.	"Under the control of the buffer manager, the shared memory switch fabric, also, retrieves packets from the shared memory and sends them to their destination ports, as instructed by the buffer manager." At FN A 00163059 Note: The individual outlet is the hardware associated with the chosen queue.
2. Temporary information storage system in accordance with claim 1, wherein	Per White Paper: JetCore Based Chassis Systems - At FN A 00163047 and subsequent pages: "Foundry chassis switching routers deliver high performance and high port density suitable for several applications .... , the systems place the intelligent packet forwarding functions on the interface modules, i.e., all the interface modules incorporate their own switching engines, buffers, queues, and switching .... This leaves the chassis' switch fabric with the simple job of non-blocking forwarding of packets between the individual interface modules. A packet classifier operating at the full line rate is responsible for parsing and examining the incoming packets at layers 2, 3, and 4, in order to make a decision on how the packet should be forwarded. ... The packet classifier's processing results in a forwarding identifier (FID) that describes the destination port(s) for the packet processed. ... it attaches an internal Foundry header to the packet. This is an optimized header that describes to the hardware how the packet should be handled from that point onwards. The FID is included as part of that header. The shared memory switch fabric is responsible for transferring the packets to and from the high speed shared memory. ... When the shared memory switch fabric receives the packet from the packet classifier, it transfers the packet to a free location in the shared memory. The fabric then reports .... to the buffer manager: ... The buffer manager uses the above information to determine .... , which queue(s) it should be placed on. .... When a packet reaches the head of its queue, the buffer manager instructs the shared memory switch fabric as to where to retrieve the packet from the shared memory (using the buffer number), and which physical port to send it to."

Comparison of Claims 1, 2, 4, and 16 of Henrion U.S. Patent No. 5,301,192 entitled TEMPORARY INFORMATION STORAGE SYSTEM COMPRISING A BUFFER MEMORY STORING DATA STRUCTURED IN FIXED OR VARIABLE LENGTH DATA BLOCK
With Foundry EdgeIron, ServerIron, NetIron, BigIron, and FastIron products – see Attachment "Model Numbers" for additional specifics

said respective individual outlet is associated with a plurality of said destinations, and	"The buffer manager, responsible for managing the priority queues, assigns the buffer number of the packet to the appropriate queue(s) of the destination port(s). When the buffer number gets to the front of its queue, the buffer manager instructs the shared memory switch fabric to retrieve the packet from the shared memory and send it to the destination port. The destination(s) of the packet could be a port on the same module (within the same port group or not), a port on another module, a mirror port, or the management module. The buffer manager then deletes the packet from the shared memory." At FN A 00163062
said data block selection means further comprises destination selection means for identifying a selected destination from said plurality of said destinations, said destination selection means further comprising fourth means for identifying all associated destinations associated with said respective individual outlet having at least one data block to transfer, fifth means responsive to said fourth means for identifying from said all associated destinations, a selected outgoing destination having at least one data block to transfer and sixth means responsive to said fifth means for establishing the identity of the queue associated with said selected destination.	"BY MR. GREENSPOON: Q What is the mechanism in JetCore for sending a packet to multiple ports on a different module? THE WITNESS: So what we do is that the destination will include multiple ports in the port mask Q By port mask you're talking about a certain portion of the FID? A So the FID basically is a index to an area which is representative of the ports and that's what I mean by port mask. ... Q So the FID is an index into a table like a hardware table which then would output the port mask? A It's an index into a into the memory which will give out the port mask ... Q So how many bits wide is the FID? A FID is 16 bit quantity. ... Q So instead the FID itself is used as an index and then the output of the index does or contains the port map? A Yes, FID is an index to aid in the memory which will give more details of the ports that it's going to be sent out on. Q What is the name of that area in memory? A It's called FID RAM." – Deposition of Nitin Jain, 1/23/2006

Comparison of Claims 1, 2, 4, and 16 of Henrion U.S. Patent No. 5,301,192 entitled TEMPORARY INFORMATION STORAGE SYSTEM COMPRISING A BUFFER MEMORY STORING DATA STRUCTURED IN FIXED OR VARIABLE LENGTH DATA BLOCK
With Foundry EdgeIron, ServerIron, NetIron, BigIron, and FastIron products – see Attachment "Model Numbers" for additional specifics

4. Temporary information storage system in accordance with claim 1, wherein said destination selection means further comprise	Per White Paper: JetCore Based Chassis Systems - At FN A 00163047 and subsequent pages: "Foundry chassis switching routers deliver high performance and high port density suitable for several applications ... , the systems place the intelligent packet forwarding functions on the interface modules, i.e., all the interface modules incorporate their own switching engines, buffers, queues, and switching .... This leaves the chassis' switch fabric with the simple job of non-blocking forwarding of packets between the individual interface modules. A packet classifier operating at the full line rate is responsible for parsing and examining the incoming packets at layers 2, 3, and 4, in order to make a decision on how the packet should be forwarded. ... The packet classifier's processing results in a forwarding identifier (FID) that describes the destination port(s) for the packet processed. ... it attaches an internal Foundry header to the packet. This is an optimized header that describes to the hardware how the packet should be handled from that point onwards. The FID is included as part of that header. The shared memory switch fabric is responsible for transferring the packets to and from the high speed shared memory. ... When the shared memory switch fabric receives the packet from the packet classifier, it transfers the packet to a free location in the shared memory. The fabric then reports ... to the buffer manager: ... The buffer manager uses the above information to determine ... , which queue(s) it should be placed on. .... When a packet reaches the head of its queue, the buffer manager instructs the shared memory switch fabric as to where to retrieve the packet from the shared memory (using the buffer number), and which physical port to send it to."

Comparison of Claims 1, 2, 4, and 16 of Henrion U.S. Patent No. 5,301,192 entitled TEMPORARY INFORMATION STORAGE SYSTEM COMPRISING A BUFFER MEMORY STORING DATA STRUCTURED IN FIXED OR VARIABLE LENGTH DATA BLOCK
With Foundry EdgeIron, ServerIron, NetIron, BigIron, and FastIron products – see Attachment "Model Numbers" for additional specifics

a counter for each destination, giving the number of data blocks to be transferred for said destination, and detection means for specifying whether said number is zero or different from zero.	"Fixed Rate Limiting counts the number of Ethernet packet bytes that a port either sends or receives, in one second intervals. The direction that the software monitors depends on the direction you specify when you configure the rate limit on the port. If the number of bytes exceeds the maximum number you specify when you configure the rate, the port drops all further packets for the rate-limited direction, for the duration of the one- second interval." At FN A 00055505 Note: many Foundry products support rate limiting – the following is only a sample from a Release Notes published 9/2000: "Rate Limiting Support on Foundry Products NetIron400 and 800 BigIron 4000 and 8000 TurboIron/8 Layer 2 Switch TurboIron/8 Layer 3 Switch" At FN A 00055504
16. Temporary information storage system in accordance with claim 1, wherein said queues are FIFO queues.	Note – see introduction portion of quotes in Claims 1,2,and 4. Note: Foundry has used FIFO queues from the very beginning, the following excerpt is from a 1997 Functional Specification from which Foundry switches were born: " Fifo Descriptions Xmt Fifo: The Xmt fifo provides the software with a single managed interface for ... Rcv Fifo: The rcv fifo is a single interface for fetching the pointer and header data for each frame which has been completely received." At FN A 00040733 Note: many other documents refer to the use of FIFOs as well. All of Foundry's queues are FIFO.