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, v. FOUNDRY NETWORKS, INC., a Delaware corporation, Defendant.	**CONFIDENTIAL FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER** Civil Action No. 05-418-SLR (JURY TRIAL DEMANDED) **PUBLIC VERSION**

DECLARATION OF ARIS WONG IN SUPPORT OF DEFENDANT FOUNDRY NETWORKS, INC.'S RESPONSIVE SUBMISSION ADDRESSING SCOPE OF DISCOVERY RE: FOUNDRY PRODUCTS

OF COUNSEL:

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Attorneys for Defendant/Counterclaimant Foundry Networks, Inc.

(As to Count I only)

Dated: August 25, 2006

Public Version: September 1, 2006

I, Aris Wong, declare:

1. I am the Manager of ASIC/FPGA Development for Foundry Networks, Inc.("Foundry"). My responsibilities cover the ASICs in Foundry's JetCore™ products, as well as the ASICs and FPGAs in Foundry's Terathon™ products. I have worked for Foundry continuously since August 28, 2000. I worked as a Member of Technical Staff, with engineering responsibilities for the JetCore™ and Terathon™ chipsets, until March 2005, when I acquired my current title and responsibilities. I received a Bachelor of Engineering degree with honors from the University of Hong Kong in June 1995. I have personal knowledge of the facts stated herein, except where otherwise stated, and I could and would testify competently to those facts if called as a witness.

2. Attached hereto as Exhibit A is a true and correct copy of a Foundry document entitled

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed in Santa Clara, California on August 24, 2006.

Aris Wong

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EXHIBIT A

THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on September 1, 2006, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY HAND DELIVERY AND E-MAIL

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I hereby certify that on September 1, 2006 I have sent by E-mail foregoing document to the following non-registered participants:

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