IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 04-874-GMS
	)	
ALCATEL S.A. and	)	
ALCATEL USA, INC.,	)	
	)	
Defendants.	)	

NOTICE OF DEPOSITION OF
INTERNATIONAL BUSINESS MACHINES CORPORATION

PLEASE TAKE NOTICE that Plaintiff Telcordia Technologies, Inc. will take the deposition of International Business Machines Corporation by oral examination using videotape, audiotape, and/or stenographic means. The deposition will begin at 8:00 am on May 1, 2006, at the Westchester Residence Inn by Marriott, 5 Barker Avenue, White Plains, New York 10601 and will continue from day to day until completed. The deposition will be taken before a Notary Public or other officer authorized by law to administer oaths.

You are invited to attend and examine the witness.

ASHBY & GEDDES

/s/ *Tiffany Geyer Lydon*

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Dated: March 14, 2006

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of March, 2006, the attached **NOTICE OF DEPOSITION OF INTERNATIONAL BUSINESS MACHINES CORPORATION** was served upon the below-named counsel of record at the address and in the manner indicated:

Josy W. Ingersoll, Esquire — HAND DELIVERY
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/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon