IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 04-874-GMS
ALCATEL USA, INC.,	)	
	)	
Defendant.	)	

PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S
OBJECTIONS TO DEFENDANT ALCATEL USA, INC.'S
NOTICE OF DEPOSITION OF BRUCE KITTAMS

Plaintiff Telcordia Technologies, Inc. ("Telcordia"), by its attorneys, hereby objects to Defendant Alcatel USA, Inc.'s ("Alcatel") Notice of Deposition of Bruce Kittams.

OBJECTIONS

1. Telcordia objects to the time and location of the deposition. Telcordia will work with Alcatel to schedule the deposition at a mutually agreeable time and place.

2. Telcordia objects to the use, including use by other parties, of any testimony from the noticed deposition in separate cases, such as the pending suits against Lucent and Cisco (Telcordia Technologies, Inc. v. Lucent Technologies, Inc. Civil Action No. 04-875-GMS and Telcordia Technologies, Inc. v. Cisco Systems, Inc., Civil Action No. 04-876-GMS).

3. Telcordia objects to the extent that this deposition in combination with depositions of other witnesses would cause Alcatel to exceed any of the limits on depositions set forth in the Federal Rules of Civil Procedure.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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Dated: March 27, 2006

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of March, 2006, the attached **PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S OBJECTIONS TO DEFENDANT ALCATEL USA, INC.'S NOTICE OF DEPOSITION OF BRUCE KITTAMS** was served upon the below-named counsel of record at the address and in the manner indicated:

Josy W. Ingersoll, Esquire — HAND DELIVERY
Young Conaway Stargatt & Taylor, LLP
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Stuart J. Sinder, Esquire — VIA ELECTRONIC MAIL
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/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon

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