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 PIERRE ADAM

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

OBJECTIONS

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

2. Telcordia objects to the extent the notice and deposition do not comply with Rules 28(b) and 29, Federal Rules of Civil Procedure, the Hague Convention, the laws of France, or the laws regarding depositions conducted in France. For example, Alcatel's March 6, 2006, notice to take the deposition of Pierre Adam beginning at 9:00 am on April 7, 2006, on its face does not appear to have properly notified all appropriate authorities of the deposition. Accordingly, Telcordia does not agree to any deposition conducted in violation of applicable laws and conventions.

3. Telcordia objects to the extent that Mr. Adam's employer has not approved this deposition, for example, by releasing Mr. Adam to divulge his employer's confidential

information.

4. 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).

5. Telcordia objects to the use of any documents at the deposition that have been obtained by Alcatel, whether by subpoena to France Telecom or otherwise, that have not been identified or provided to counsel for Telcordia by the close of business on March 31, 2006, including documents bearing a production range of KK000001-KK000121.

6. Telcordia objects to the extent that defendants Alcatel, Cisco, or Lucent have had access to the noticed deponent prior to the deposition, such as through informal interviews in which Telcordia was not present.

7. Telcordia objects to the late notice regarding contact information of the noticed deponent.

8. Telcordia objects to the redaction of information in certain documents within the production range of KK000001-KK000121, because no basis has been provided for withholding this information from Telcordia.

ASHBY & GEDDES

/s/ Tiffany Geyer Lydon

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Dated: April 3, 2006

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of April, 2006, the attached **PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S OBJECTIONS TO DEFENDANT ALCATEL USA, INC.'S NOTICE OF DEPOSITION OF PIERRE ADAM** was served upon the below-named counsel of record at the address and in the manner indicated:

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HAND DELIVERY

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VIA FEDERAL EXPRESS

/s/ Tiffany Geyer Lydon

Tiffany Geyer Lydon

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