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July 13, 2006

BY E-FILING

The Honorable Gregory M. Sleet
United States District Court
844 King Street
Wilmington, DE 19801

Re: *Telcordia Technologies, Inc. v. Alcatel USA, Inc.*
Civil Action No. 04-874-GMS

Dear Judge Sleet:

On July 10, 2006, Defendant Alcatel USA, Inc. ("Alcatel") timely filed a Motion for Mandatory Stay of Proceedings pursuant to 28 USC § 1659(a), requesting the Court to enter a stay of the current action. There is no question that the requested stay should be granted because, pursuant to the statute, "the district court **shall** stay … proceedings in the civil action" (emphasis added) where, as here, Alcatel is a Respondent in the ITC Investigation instituted by Telcordia, which alleges infringement of the same patents asserted against Alcatel in this action.

Moreover, Telcordia's July 11, 2006 letter to Your Honor acknowledges Alcatel's "statutory right (under 28 USC §1659) to stay the action before this Court," and expresses no objection to Your Honor promptly granting Alcatel's Motion.

Because the next round of expert reports in this action will be due next Friday, and Alcatel wishes to avoid the continuing expense of defending against Telcordia's patent claims here while it is simultaneously defending against them in the ITC (which is the underlying purpose of the mandatory stay provision), Alcatel would appreciate Your Honor approving the Order Granting Motion (a copy of which is annexed hereto) at your earliest convenience.

Respectfully submitted,

Josy W. Ingersoll (No. 1088)

JWI:cg
Enclosure

cc: Clerk of the Court (by e-filing and hand delivery)
Steven J. Balick, Esquire (by e-filing and e-mail)
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Don O. Burley, Esquire (by e-mail)
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