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December 13, 2005

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

VIA ELECTRONIC FILING

Re: *Telcordia Technologies, Inc. v. Alcatel U.S.A., Inc.*
C.A. No. 04-874-GMS

Dear Judge Sleet:

Plaintiff Telcordia hereby respectfully submits its proposed agenda in the above case, in anticipation of the combined teleconference scheduled at 11:30 a.m. on December 15, 2005 in C.A. Nos. 04-874, 875, and 876-GMS. Telcordia notes that Alcatel was not ready to provide its portion of this letter in time for our 48-hour filing deadline, and we therefore are filing our own proposed agenda letter rather than a joint submission.

A. Claim Construction Issue Common to All Cases

The defendants have not addressed Telcordia's means-plus-function claims during the claim construction process. Telcordia respectfully requests an Order compelling Alcatel (and the other defendants) to provide proposed claim constructions for all claims and claim terms asserted by Telcordia prior to the November 17, 2005, deadline for exchanging disputed claim terms.

B. Alcatel's Claim Constructions

(1) Alcatel identified 71 disputed claim terms, and Telcordia offered proposed constructions for all 71 terms. Alcatel only offered constructions for 24 terms, and offered the construction of "ordinary meaning" for 5 terms. Telcordia respectfully requests an Order (1) precluding Alcatel from offering constructions for the claim terms that it identified in its list of disputed claim terms but for which it did not offer proposed constructions, (2) precluding Alcatel from offering constructions for the five claim terms for which it offered "ordinary meaning" as a construction, and (3) precluding Alcatel from relying on, or introducing into evidence, Telcordia's proposed constructions for (a) the claim terms for which Alcatel did not offer proposed constructions, and (b) the claim terms for which Alcatel offered the construction of "ordinary meaning."

C. Alcatel's Interrogatory and Document Responses

Telcordia respectfully requests an Order compelling Alcatel to supplement its answers to Telcordia's interrogatories on damages, invalidity contentions, and infringement contentions, and to address Telcordia's '633 patent in its answers. Telcordia also respectfully requests an Order compelling Alcatel to produce specific documents relevant to Telcordia's infringement analysis and documents relevant to Telcordia's damages analysis.

E. The Protective Order

The parties have been unable to agree upon the terms of a Protective Order.

Respectfully,

/s/ *Steven J. Balick*

Steven J. Balick (I.D. #2114)

SJB: nml
164555.1
cc: Josy W. Ingersoll, Esquire (by hand)
Stuart J. Sinder, Esquire (via electronic mail)
John Williamson, Esquire (via electronic mail)