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December 13, 2005

BY CM/ECF

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

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

Dear Judge Sleet:

In preparation for the teleconference scheduled on December 15, 2005, at 11:30 a.m., Alcatel submits this letter agenda.

Alcatel's Issues

1) **Telcordia's unseasonable assertion of additional claims**

a) Telcordia should be precluded from adding new claims at this late date because Telcordia has long known of the functionality of the allegedly third-party infringing integrated circuits in the accused products

2) **Telcordia's Document Production**

a) Telcordia's refusal to provide any discovery on Alcatel's '052 patent, including any sales information on the Telcordia products that Alcatel has accused of infringement

b) Telcordia's withholding of Telcordia's documents relating to the testing and certification of the specifically accused Alcatel products under Telcordia's OSMINE process

c) Telcordia's failure to provide relevant license agreements

d) Telcordia's withholding of Fore Systems pleadings, depositions, and other court submissions from the Fore Systems case as Fore Systems confidential

3) The Alcatel/Telcordia Protective Order

a) Alcatel proposes that Alcatel's proposed "source code" protection provisions are sufficient

b) Alcatel proposes including European Patent Attorneys in the definition of in-house counsel

c) Alcatel opposes the inclusion of Telcordia employees who are actively involved in Telcordia's day-to-day licensing negotiations as persons permitted to view Alcatel confidential material

4) Discovery From Alcatel

a) Telcordia should be precluded from seeking Alcatel's financial information related to Alcatel's sales to the Regional Bell Operating Companies (RBOCs) and AT&T, because Telcordia has conceded that those sales are not infringing and has stated that it would not seek damages for those sales

Respectfully Submitted,

Karen E. Keller (#4489)

cc: Steven J. Balick, Esq. (by CM/ECF)