IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 04-875-GMS
LUCENT TECHNOLOGIES INC.,	)	
	)	
Defendant.	)	

PLAINTIFF TELCORDIA TECHNOLOGIES, INC.'S
OBJECTIONS TO DEFENDANT LUCENT TECHNOLOGIES INC.'S
NOTICE OF DEPOSITION OF JAMES W. FALK

Plaintiff Telcordia Technologies, Inc. ("Telcordia"), by its attorneys, hereby objects to Defendant Lucent Technologies Inc.'s ("Lucent") Notice of Deposition of James W. Falk.

OBJECTIONS

1. Telcordia objects to the time and location of the deposition. Telcordia will work with Lucent 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 Alcatel and Cisco (Telcordia Technologies, Inc. v. Alcatel USA, Inc. Civil Action No. 04-874-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 Lucent to exceed any of the limits on depositions set forth in the Federal Rules of Civil Procedure.

4. Telcordia objects to the extent that this deposition seeks information that is protected by claims of attorney-client privilege or attorney work product in light of James Falk's work as a lawyer for Telcordia.

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 LUCENT TECHNOLOGIES INC.'S NOTICE OF DEPOSITION OF JAMES W. FALK** was served upon the below-named counsel of record at the address and in the manner indicated:

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