IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

STIPULATION AND PROPOSED ORDER

Plaintiff Telcordia Technologies, Inc. and defendant Lucent Technologies, Inc. ("Lucent") hereby stipulate and agree, subject to the approval of the Court, that:

1. Pursuant to Fed. R. Civ. P. 15(a), the parties have agreed that plaintiff may file its First Amended Complaint in the form attached hereto at Tab A. For reference, a blacklined version of the amended pleading is attached at Tab B.

2. To provide time for defendant Lucent to begin its investigation of its defenses to plaintiff's First Amended Complaint, Lucent shall answer, move, or otherwise respond to the First Amended Complaint on August 3, 2005.

ASHBY & GEDDES

/s/ John G. Day

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SO ORDERED this ___ day of _____, 2005

United States District Judge

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