EXHIBIT D1

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 **REDACTED PUBLIC VERSION**
TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. CISCO SYSTEMS, INC., Defendant/Counterclaim Plaintiff.	)	Civil Action No. 04-876-GMS

EXHIBIT D1:

TELCORDIA'S WITNESS LIST

Plaintiff Telcordia Technologies Inc. ("Telcordia") hereby submits its witness list as of March 2, 2007. Telcordia reserves the right to submit, as appropriate, additions and/or revisions to their witness list as the pretrial and trial process evolves, including meeting and conferring with defendants on outstanding trial management issues and receiving the Court's rulings on matters such as the parties' respective motions *in limine*. Telcordia reserves the right to call any witness on defendants' witness list and any witness called by defendants. To the extent that Telcordia has not yet had an opportunity to depose a potential witness and will not be provided

with an opportunity to depose such a witness, Telcordia objects to defendants' inclusion of such witness(es) on their witness list. Telcordia also objects to the defendants' identification of witnesses it may call "by video" to the extent that this identification extends beyond the deposition designations (and associated objections) identified by the parties in Exhibit F. Telcordia reserves all objections under Fed. R. Civ. P. 32(a), and specifically objects under Fed. R. Civ. P. 32(a)(3) to the defendants' calling witnesses "by video." Telcordia reserves the right to introduce deposition testimony consistent with the deposition designations set forth in Exhibit F.

Witnesses That Will Be Called:

1. Paul Prucnal
2. Doug Clark,
3. Paul Fleischer,
4. Chi-Leung Lau,
5. Joseph Giordano,
6. James Nawrocki, IP & Financial Consulting, 7000 N. Mopac, Suite 200, Austin, Texas 78731

REDACTED

Witnesses That May Be Called:

7. Mark Garrett,
8. Dave Sincoskie,
9. Lanny Smoot,
10. Liang Wu,

REDACTED

11. Hung-Hsiang Chao,

12. Vernon Anthony,

13. Brian Holden,

14. Vincent Jones,

15. Brian Rushka,

16. Gary Muntz, **REDACTED**

17. Vipul Jain,

18. Tim Zhou,

19. Jeffrey Towne,

20. Dongpiu Liu,

21. James Falk,

22. Steve Minzer,

23. Mark Beckner,

24. Robert Barr, University of California, Berkeley, School of Law (Boalt Hall), Berkeley, California 94720

25. Rick de Pinho, **REDACTED**

26. William Rubin, Telcordia Technologies, One Telcordia Drive, Room RRC 4A607, Piscataway, New Jersey 08854

27. W. Todd Schoettelkotte, FTI Consulting, Inc., First City Tower, 1001 Fannin, Suite 500, Houston, Texas 77002

28. Michael Wei, FTI Consulting, Inc., One Front Street, Suite 1600, San Franciso, California 94111

29. Leonard Suchyta, Verizon Legal VC54S215, One Verizon Way, Basking Ridge, New Jersey 07920

30. Steven Gurey, REDACTED

31. John T. Peoples,

32. Kenneth Rubenstein, Proskauer Rose LLP, 1585 Broadway, New York, NY 10036-8299

33. Steve Walters, REDACTED

34. Anthony Alles,

EXHIBIT D2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. LUCENT TECHNOLOGIES, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04-875-GMS **REDACTED PUBLIC VERSION**
TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. CISCO SYSTEMS, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04-876-GMS

EXHIBIT D2: DEFENDANTS' WITNESS LIST

Defendants Cisco and Lucent hereby submit their witness list as of March 2, 2007. Defendants reserve the right to submit, as appropriate, additions and/or revisions to their witness list as the pretrial and trial process evolves, including meeting and conferring with Telcordia on outstanding trial management issues and receiving the Court's rulings on matters such as the parties' respective motions *in limine*. Defendants also reserve the right to call any witnesses on Telcordia's witness list and any witnesses called by Telcordia.

To the extent that Defendants have not yet had an opportunity to depose a potential witness and will not be provided with an opportunity to depose such a witness, Defendants object to Telcordia's inclusion of such witness(es) on its witness list.

I. **DEFENDANTS WILL CALL THESE WITNESSES LIVE:**

1. Dr. Anthony Acampora,
2. Dr. Hung-Hsiang Chao,
3. Dr. Wayne Grover,

REDACTED

II. **CISCO WILL CALL THESE WITNESSES LIVE:**

1. Mr. Mark Carroll,
2. Mr. Guy Fedorkow,
3. Mr. Gary Muntz,
4. Mr. Terry Musika,
5. Mr. Brian Rushka,

REDACTED

III. **LUCENT WILL CALL THESE WITNESSES LIVE:**

1. Mr. Thomas Buonanno,
2. Dr. Jerry Hausman,
3. Mr. Jeffrey Towne,

REDACTED

IV. **DEFENDANTS MAY CALL THESE WITNESSES LIVE:**

1. Mr. Pierre Adam,
2. Mr. Vernon Anthony,
3. Dr. Yau-Chau Ching,
4. Dr. Paul Fleischer,
5. Mr. Mark Garrett,
6. Mr. Joseph Giordano,
7. Mr. Stephen Gurey,
8. Mr. James Hammond,

REDACTED

9. Mr. Brian Holden,

10. Mr. Steve Joroff,

11. Dr. Chi-Leung Lau,

12. Dr. Vincent Jones,

13. Mr. W. David Sincoskie,

14. Librarian(s) to authenticate documents

REDACTED

V. CISCO MAY CALL THESE WITNESSES LIVE:

1. Mr. Anthony Alles,

2. Mr. Robert Barr,

3. Mr. Greg Fujii,

4. Mr. James Keyes,

5. Mr. Art Reilly,

REDACTED

VI. LUCENT MAY CALL THESE WITNESSES LIVE:

1. Mr. John Clarke,

2. Ms. Lynn Erb,

3. Mr. James Jordan,

4. Mr. Michael McCormick,

5. Mr. Xin Zhou,

REDACTED

VII. ONE OR BOTH DEFENDANTS MAY CALL THESE WITNESSES BY VIDEO:

1. Mr. Pierre Adam,

2. Mr. Vernon Anthony,

REDACTED

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[1] Defendants reserve the right to offer testimony from Dr. Jones on the invalidity of the '633 patent if they are unable to offer testimony from Dr. Acampora on the invalidity of the '633 patent.

3. Mr. Robert Barr,
4. Mr. Mark Beckner,
5. Mr. Jean-Yves Cochennec
6. Mr. Brian Day,
7. Mr. Rick de Pinho,
8. Mr. James Falk,
9. Mr. Mark Garrett, **REDACTED**
10. Mr. C. Zachary Gilstein,
11. Mr. Joseph Giordano,
12. Mr. James Hammond,
13. Mr. Thierry Houdoin,
14. Mr. Brian Holden,
15. Mr. Steve Joroff,
16. Mr. Bruce Kittams,
17. Mr. Sang-Hoon Lee,
18. Mr. Tony Tong Lee, Chinese University of Hong Kong, Shatin, N.T., Hong Kong
19. Mr. Steve Minzer,
20. Dr. Vincent Jones, **REDACTED**
21. Mr. Stanley Rosen,
22. Mr. William Rubin, One Telcordia Drive, Piscataway, New Jersey
23. Mr. W. David Sincoskie, **REDACTED**
24. Mr. Leonard Suchyta, One Verizon Way, Basking Ridge, New Jersey
25. Mr. Liang Wu, **REDACTED**

EXHIBIT E1

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

TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. CISCO SYSTEMS, INC., Defendant/Counterclaim Plaintiff.	)	Civil Action No. 04-876-GMS

EXHIBIT E1: PLAINTIFF TELCORDIA'S
STATEMENT SETTING FORTH QUALIFICATIONS OF ITS EXPERTS

Plaintiff Telcordia Technologies Inc. ("Telcordia") hereby submits its statement setting forth the qualifications of its expert witnesses in such form as can be read to the jury at the time the expert witness takes the stand.

Paul Prucnal

Dr. Paul Prucnal is an expert in optical telecommunications, with particular emphasis on fiber-optic communications networks. His professional experience from the late 1970s to date has been closely connected with the study of optical telecommunications. Dr. Prucnal intends to testify regarding Cisco and Lucent's infringement of the '763 patent and regarding the validity and enforceability of the '763 patent, should Cisco and Lucent contend that the '763 patent is invalid or unenforceable.

Dr. Prucnal is a Professor of Electrical Engineering at Princeton University and director of Princeton's "Lightwave Communications Research Laboratory." He obtained a BA, summa cum laude, from Bowdoin College in 1974. He earned a MS, a M. Phil. and a Ph.D. from Columbia University in 1976, 1978 and 1979 respectively. From 1979 to 1984, and from 1984 to 1987, he was, respectively, an Assistant and an Associate Professor, at Columbia University. In 1988, he joined Princeton University, where he is currently a Full Professor of Electrical Engineering. He was the founding director of Princeton's Advanced Technology Center for Photonics and Optoelectronic Materials, and has served as the principal investigator for several DARPA-funded programs to develop advanced optical networks. Dr. Prucnal has taught courses on fiber-optic networks and optical communications networks.

Dr. Prucnal has authored over 100 papers and publications in the field of optical networking. He has done research and development on optical networks in both academia and industry for over 25 years, and his work has extended across the broad areas of optical and optoelectronic technology and systems, and has supervised numerous Ph.D. theses in these areas.

He has held the position of Associate Editor of the industry publication IEEE Transactions on Communications and Applied Optics.

Dr. Prucnal has held numerous technical consulting positions, including with Phillips Laboratories, Optical Information Systems, Inc., GTE Labs, AT&T Bell Laboratories, IBM, Dove Electronics, Siemens Corporate Research, Center for Computing Sciences, Sun Microsystems, SAIC, Multi Link Technologies, Inc., Alphion, Inc., Ultra Fast Optical Systems, NEC Laboratories America, and Princeton Optronics. Cisco funded Dr. Prucnal's research regarding high capacity optical interconnects for IP routers.

As part of both his academic research and industry consulting work, he has often been responsible for specifying and obtaining optical component technologies from vendors, including custom-designed components, and designing architectures for optical networks.

Professor Douglas W. Clark

Prof. Douglas W. Clark is and has been a Professor of Computer Science at Princeton University since 1993. He earned a Bachelor of Science (B.S.) degree, *magna cum laude*, In Engineering and Applied Science from Yale University in 1972 and was a Yale National Scholar from 1968 through 1972. Dr. Clark earned a Ph.D. in Computer Science from Carnegie-Mellon University in 1976 and was a Xerox Graduate Fellow from 1973 through 1976.

Prof. Clark has 31 years of experience in the field of electrical engineering and computer science. He has worked on problems ranging from the design, analysis, and construction of digital circuits in the field of clocking, particularly the study of clocking systems and clock synchronization. He has also worked as a consultant in the field of computer systems and computer architecture, including computer networking and digital signal processing, circuit design, clocking techniques, and timing recovery.

From 1976 through 1980, Prof. Clark was a Member of the Research Staff at the Computer Science Laboratory, Xerox Palo Alto Research Center. He was an engineer from 1980 through 1990 and then again from 1991-1993 at Digital Equipment Corporation, as well as becoming a Visiting Lecturer at the Division of Applied Sciences of Harvard University in 1990-1991. Prof. Clark was also a Visiting Professor of Computer and Information Science at the Unversity of Pennsylvania in the spring of 2003.

Prof. Clark has authored or co-authored at least 60 technical publications in areas such as multicomputers, adaptive reaction time in multiple-clock-domain processors, adaptive globally-synchronizing clock algorithms, synchronization for multi-port frame buffers on mesh-controlled

multicomputers, benchmarks for measuring system performance, and microprocessor energy and performance control. His resume contains a list of such publications.

JAMES J. NAWROCKI

James J. Nawrocki is founder of IP & Financial Consulting, an independent consulting firm that provides a variety of consulting services including financial analysis and valuation assessments for companies relating to technology issues such as patents, trade secrets, copyrights and other forms of intellectual property. Mr. Nawrocki and his firm also provide financial analysis relating to damage assessments and evaluations for corporate disputes, litigation, and acquisitions and divestitures.

Mr. Nawrocki is a Certified Public Accountant and is licensed in the State of Illinois and Texas. He earned a Bachelor of Business Administration degree with a Major in Accounting from St. Mary's University, San Antonio, Texas in 1979. Since then, he has had more than 25 years of experience as a financial consultant involved in a variety of litigation matters and disputes including intellectual property litigation, antitrust claims, breach of contract issues, and valuations and general damages analysis. He has provided litigation consulting assistance in more than 100 cases related to financial, accounting, market analysis, and damage issues. Over the past four years, Mr. Nawrocki has testified either at depositions or trial or both, in more than 25 litigated cases.

Mr. Nawrocki has significant experience providing financial consulting services relating to damage analysis and other matters in the following industries:

- Airline - Aircraft
- Agriculture
- Automotive
- Chemicals
- Computer Software
- Construction
- Electronics
- Healthcare/Medical Products
- Manufacturing
- Oil and Gas
- Retail/Consumer Products
- Semiconductors
- Telecommunications
- Utilities

Mr. Nawrocki's financial and damages analyses including calculation of lost profits, incremental profits, licensing and royalty determinations, manufacturing and marketing capacity, fixed and variable cost analysis, allocation of costs, and evaluation of forecasts and projections of product line and profitability.

Mr. Nawrocki was a founder of Technology & Financial Consulting ("TFC"), a consulting firm that provided financial and damages analysis services to companies in various industries. TFC was acquired by FTI Consulting, Inc., a large national consulting firm, where Mr. Nawrocki becamse a senior director and national director of FTI's intellectual property practice. In January 2006, Mr. Nawrocki formed IPF Consulting, where he continues in his financial and damages consulting practice, specializing in intellectual property litigation cases.

Mr. Nawrocki has written and lectured on a number of topics relating to valuation of intellectual property rights and the calculation of damages in intellectual property litigation. Among his articles and presentations are the following:

> "Financial Valuations of Intellectual Property" - Guest Lecturer, Spring 1996, University of Houston L.L.M. Program
>
> "Licensing in the Electronics Industry" - 1996 Licensing Executives Society Annual Meeting
>
> "Strategic Valuations and Management of Intellectual Property" - Guest Lecturer, Spring 1998, University of Houston L.L.M. Program
>
> "Damages Strategies in an Evolving World" - November 1998, The University of Texas School of Law - Advanced Patent Law Institute
>
> "Where are the Costs in Patent Litigation? (And What is the Value Being Received?)" - 1999 Fourth International Symposium on Reduction of Patent Costs, The Hague, Netherlands

"Dealing With Experts: An Expert's Perspective", State Bar of Texas, Advanced Patent Litigation: Strategies and Tactics, July 28-29, 2005, Lake Tahoe, Nevada

"Calculating Damages in Litigation" - Patent Infringement, Trademark Infringement & False Advertising, Guest Lecturer, Chicago-Kent College of Law, March 2006

Mr. Nawrocki is a member of:

American Institute of Certified Public Accountants

Illinois Certified Public Accountant Society

Texas Society of Certified Public Accountants

Licensing Executives Society

University of Houston Law School - Intellectual Property Advisory Board (1994 - 1998)

EXHIBIT E2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. LUCENT TECHNOLOGIES, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04-875-GMS
TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. CISCO SYSTEMS, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04-876-GMS

EXHIBIT E2: DEFENDANTS' STATEMENT SETTING FORTH QUALIFICATIONS OF THEIR EXPERT WITNESSES

Defendants Cisco and Lucent hereby submit statements setting forth the qualifications for each of their expert witnesses in such form that the statement can be read to the jury at the time the expert witness takes the stand.

PROFESSOR ANTHONY ACAMPORA

Professor Anthony Acampora is a professor of Electrical and Computer Engineering at the University of California in San Diego. Dr. Acampora has close to 40 years of experience in the fields of telecommunications and networking. He will testify for Defendants on the invalidity of the '306 and '633 patents, and the non-infringement of the '633 patent.

In addition to advising Ph.D. candidates and teaching undergraduate students, Dr. Acampora researches a broad array of topics at U.C. San Diego, including broadband telecommunications networks, the Internet, and optical networks. Prior to teaching at U.C. San Diego, Dr. Acampora was a professor of electrical engineering at Columbia University, where he studied wireless communications networks, high speed optical networks, and advanced communications theory. As director of Columbia's Center for Telecommunications Research, Dr. Acampora oversaw the efforts of 25 faculty members, 55 graduate students, and eight full-time staff scientists on multi-million dollar telecommunications research programs.

Dr. Acampora received his Ph.D. in 1973 from the Polytechnic Institute of Brooklyn, where he studied quantum electronics and nonlinear wave-matter interaction. Following graduate school, Dr. Acampora was a researcher at Bell Labs, where he studied data communications theory, broadband metropolitan networks, optical switching and networks, and high capacity digital satellite systems. As director of the Transmission Technology Laboratory, Dr. Acampora managed a group of 80 people, including three department heads, eight technical advisors, and 49 Ph.D.-level scientists and engineers.

Dr. Acampora is a named inventor on 30 U.S. patents, and has published over 140 peer-reviewed articles on telecommunications and networking. These articles have appeared in a wide range of scientific and engineering journals, including Scientific American. Dr. Acampora

is also the author of a textbook on networking entitled "An Introduction to Broadband Networks."

Dr. Acampora has received numerous awards and honors over the course of his career. In 1988, Dr. Acampora was named a Fellow of the Institute of Electrical and Electronic Engineers ("IEEE"), being cited for his contributions to the field of high capacity digital satellite systems and broadband communications networks. Dr. Acampora has also delivered invited testimony to the U.S. House of Representatives on the role of basic research in American economic competitiveness.

PROFESSOR WAYNE D. GROVER

Professor Wayne Grover is a Professor of Electrical and Computer Engineering at the University of Alberta, where he teaches senior undergraduate courses on Telecommunication Systems Engineering and Communication Systems and graduate courses on Survivable Broadband Networks and Digital Transmission Networking. He will testify for Defendants on the invalidity and non-infringement of the '763 patent.

Dr. Grover received his Ph.D. in Electrical Engineering in 1989 from the University of Alberta, where his doctoral thesis was directed to survivable networks. He received his Masters of Science degree in Electrical Engineering Science – Telecommunications in 1981 from the University of Essex in England, where he attended as a Commonwealth Scholar, and his Bachelors Degree in Electrical Engineering with High Distinction in 1976 from Carleton University in Ottawa.

Dr. Grover has over 30 years of experience in telecommunications, with a focus on survivable networks. Prior to teaching, Dr. Grover worked at the predecessor to Nortel Networks, where he received patents on techniques for automatic protection switching, in-band signaling, digital signal performance monitoring, packetization for time division multiplexed switching and transport, and error correction in fiber optic transmission systems. Specifically, he has personally worked on telecommunications technologies such as the SYNTRAN Add-Drop Multiplexer ("ADM") product, Northern Telecom's FD-565 multiplexers, digital cross connect switches, add-drop multiplexers, and other SONET equipment.

Dr. Grover has lectured and published extensively in the area of telecommunications networks. He has written several frequently cited technical articles on survivable networks, including articles on survivable ring and mesh networks. He has also been

granted several patents relating to survivable networks. In 2003, Dr. Grover wrote a textbook on survivable networks, titled "Mesh-based Survivable Networks: Options and Strategies for Optical MPLS, SONET and ATM Networking." In 2002, Dr. Grover was elected Fellow of the IEEE for his "contributions to survivable and self-organizing broadband networks."

VINCENT JONES, Ph.D.[1]

Vincent Jones, Ph.D., is the President and principal consultant for Networking Unlimited, Inc., where he designs computer networks and provides networking consulting for clients that include Fortune 500 companies. He may testify for Defendants on the invalidity of the '633 patent.

Dr. Jones received his Ph.D. in Electrical Engineering from the University of Illinois, Urbana-Champaign, in 1975. He received his Masters of Science degree in Electrical Engineering from the University of Illinois, Urbana-Champaign, in 1972 and his Bachelors Degree in Electrical Engineering from Rutgers University in 1970. Dr. Jones received his Professional Engineer's license in 1981.

Dr. Jones has over thirty years experience in the design and implementation of data communications and computer networks. Dr. Jones served in the United States Air Force, first as a Systems Implementation Officer (First Lieutenant) and then as an Electronics System Research Manager (Captain). He then worked for almost ten years for Hewlett-Packard Corporation, first as a member of Technical Staff designing software for desktop computers, then as a Lead Engineer supervising software development, and finally as a Product Manager leading research and development teams for networking products.

Dr. Jones' teaching experience includes teaching Electrical Engineering as an Adjunct Professor at the University of Missouri, the Florida Institute of Technology, and Colorado State University.

[1] Defendants reserve the right to offer testimony from Dr. Jones on the invalidity of the '633 patent if they are unable to offer testimony from Dr. Acampora on the invalidity of the '633 patent, and submit this statement of Dr. Jones' qualifications under an abundance of caution.

Dr. Jones is widely published in the area of networking, and has presented technical papers on computer networking at several conferences. Dr. Jones has authored several books on computer networking.

TERRY L. MUSIKA

Terry Musika has over 30 years of experience helping a broad range of clients with issues relating to accounting, finance, valuation, and general business planning and restructuring. He will testify on the subject of damages for Cisco.

Mr. Musika earned a bachelor's degree in 1970 and a master's degree in public finance in 1974, both from Indiana University. He is a certified public accountant in the state of Maryland.

Mr. Musika has written many articles on the valuation of intellectual property. He has testified in courts throughout the United States regarding his damages analyses in intellectual property matters, including patent litigations. Recently, his testimony was cited in an opinion published by the United States Court of Appeals for the Third Circuit.

As an accountant, Mr. Musika's has 12 years of experience with "Big 4" public accounting firms. After completing his master's degree, Mr. Musika worked for five years as an auditor and consultant at the predecessor to KPMG. Mr. Musika's audit and consulting experience there included both private and public companies from various industries and numerous government entities. Mr. Musika then spent seven years at the predecessor to PricewaterhouseCoopers. There, he was a national research consultant, audit partner, and Partner-In-Charge of the firm's Baltimore Business Investigative Services Practice.

Mr. Musika also has extensive entrepreneurial experience. Over the past 30 years, Mr. Musika has formed, owned and operated four different companies. In one instance, Mr. Musika started a financial and economic consulting firm as the first employee, and eventually grew the company into a national firm, having over 125 accounting, economic and

legal professionals with offices in Wilmington, Washington D.C., Baltimore, New York, and Atlanta.

PROFESSOR JERRY A. HAUSMAN

Dr. Jerry Hausman is the MacDonald Professor of Economics at the Massachusetts Institute of Technology. He will testify on the subject of damages for Lucent.

Dr. Hausman graduated from Brown University in 1968 and received his Ph.D. in economics from Oxford University in 1973, where he was a Marshall Scholar. Since then, Dr. Hausman has been a professor at MIT. In 1985, Dr. Hausman received the John Bates Clark Award of the American Economic Association, awarded every other year for the most "significant contributions to economics" by an economist under the age of 40.

Dr. Hausman's academic specialties include econometrics and applied microeconomics. Dr. Hausman has been involved in the telecommunications industry through teaching, research, and consulting for the past 30 years. He teaches a graduate course each year in "Competition in Telecommunications." The primary topics covered by the course are technological developments in the telecommunications industry. Dr. Hausman has also testified before Congress and the Federal Communications Commission regarding issues in telecommunications. He has served as an advisor to numerous other governments regarding telecommunications policy. Dr. Hausman has also served as consultant to various telecommunications companies, ranging from service providers to equipment manufacturers and research laboratories.

Dr. Hausman has published over 130 academic research papers in leading economic journals, including numerous academic papers in telecommunications. His recent publications include "Telecommunications Regulation: Current Approaches with the End in Sight" and "Two Sided Markets with Substitution: Mobile Termination Revisited." He has served as an associate editor of *Econometrica*, the leading economics journal, and the *Rand*

(Bell) Journal of Economics, the leading journal of applied microeconomics.

Dr. Hausman also has extensive experience in the area of patent licensing, specifically license agreements related to telecommunications patents. His work in this area has involved both the analysis of damages for patent infringement and consultation during licensing negotiations. Dr. Hausman's testimony has been cited by numerous courts.

EXHIBIT F1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. LUCENT TECHNOLOGIES, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04 – 875 – GMS
TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. CISCO SYSTEMS, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04 – 876 – GMS

EXHIBIT F1:

TELCORDIA'S AND DEFENDANTS' RESPECTIVE DESIGNATIONS AND OBJECTIONS OF DEPOSITION TESTIMONY OF CERTAIN WITNESSES

The attached document includes Telcordia's initial designations of the depositions of certain witnesses, the defendants' responsive objections and counter-designations to Telcordia's initial designations, and Telcordia's responsive objections and reply-designations to the defendants' counter-designations.

Case 1:04-cv-00875-GMS Document 334-3 Filed 03/09/2007 Page 33 of 229

Telcordia's preliminary statement:

Although not specifically stated herein, Telcordia's objections include all objections under Rule 611 and any other objections included in the deposition record.

Telcordia objects to the defendants' use of deposition testimony for any witness who lives or works within 100 miles of the Courthouse pursuant to Federal Rule of Civil Procedure 32(a)(3).

Telcordia reserves the right to use any and all of its initial deposition designations as counter-designations to the defendants' initial designations or as reply designations to defendants' counter-designations. Telcordia also reserves the right to use any and all of its counter-designations to defendants initial deposition designations as reply-designations to defendants' counter designations.

Defendants' preliminary statement:

Although not specifically stated herein, Defendants' objections include all objections under Rule 611 and any other objections included in the deposition record. Because Telcordia designated long portions of testimony that it will not reasonably be able to use at trial, Defendants reserve the right to use any testimony designated by Telcordia as a counterdesignation to any other testimony designated by Telcordia even though not noted herein. In addition, in many cases, Telcordia designated incomplete testimony. Rather than object to each such instance as "incomplete," Defendants counterdesignated the testimony required for completeness.

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Defendants also object globally to Telcordia's use of testimony against a Defendant if that Defendant was not present at the deposition, even if the other Defendant was present. Pursuant to the parties' Stipulation on Deposition Counting and Use, deposition testimony may not be used against a party that was not present at the deposition. Defendants further note that they have not objected to attorney objections and colloquy based on the understanding that such designations are improper and will be removed prior to the trial.

The witnesses' testimony identified in this submission and the beginning pages that relate to each witness are:

Deposition of Pierre Adam 1

Deposition of Vernon Anthony.....3

Deposition of Robert Barr.....4

Deposition of Mark Beckner.....7

Deposition of Mark Carroll.....8

Deposition of Jonathan Chao 10

Deposition of Yau – Chau Ching.....12

Deposition of Jean – Yves Cochennec.....13

Deposition of Rick Augusto dePinho 15

Deposition of Lynn Erb 22

Deposition of James Falk.....24

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Deposition of Guy Fedorkow.....27
Deposition of Paul Fleischer.....29
Deposition of Greg Fujii.....38
Deposition of Mark Garrett.....41
Deposition of Joseph Giordano.....45
Deposition of Brian Holden.....47
Deposition of Thierry Houdoin.....49
Deposition of Vincent Jones.....52
Deposition of James Jordan.....54
Deposition of James Keyes.....56
Deposition of Bruce Kittams.....59
Deposition of Richard Lau.....63
Deposition of Tony Tong Lee.....75
Deposition of Michael McCormick.....77
Deposition of Dawn McKenna.....79
Deposition of Steven Minzer.....81
Deposition of Gary Muntz.....82
Deposition of Ben Pressey.....88

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Deposition of Stanley Rosen.....91

Deposition of William Rubin.....92

Deposition of Brian Rushka.....93

Deposition of Bruce Schneider.....98

Deposition of David Sincoskie.....100

Deposition of Leonard Suchyta.....102

Deposition of Michael Takefman.....104

Deposition of Jeffrey Towne.....106

Deposition of Liang Wu.....111

Deposition of Tim Zhou.....115

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Deposition of Pierre Adam[1]
April 7, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
8:12 – 9:2				
13:23 – 13:25		11:20 – 23; 12:6 – 22; 14:18 – 21	*	
14:2 – 14:15		11:20 – 23; 12:6 – 22; 14:18 – 21	*	
14:22 – 16:2		14:18 – 21		
16:17 – 17:9		16:11 – 12		
19:9 – 20:8		20:9 – 21:8; 22:10 – 19; 21:24 – 22:5	*	
24:4 – 24:20		24:21 – 25:23	*	
39:2 – 39:19				
46:12 – 47:3		45:18 – 46:11	*	
51:2 – 51:10		51:11 – 14		
65:20 – 65:25		66:2 – 9		65:11-19
67:18 – 68:5				
69:22 – 70:5				
70:15 – 71:21		71:22 – 73:8	*	
73:9 – 73:22				
75:8 – 76:3				
82:16 – 82:22		82:5 – 15; 83:6 – 23	*	
84:13 – 84:16	401 – 403			
85:10 – 85:15	401 – 403			

[1] * See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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86:18 – 86:21	401 – 403			
87:24 – 89:5	401 – 403	89:6 – 15; 90:3 – 10		89:16-90:2; 90:23-91:21
90:11 – 90:22	401 – 403	89:6 – 15; 90:3 – 10		89:16-90:2; 90:23-91:21
94:10 – 94:20	401 – 403			
95:21 – 96:3				
97:20 – 97:24				
98:20 – 98:25				
102:5 – 102:14		50:7 – 14; 102:23 – 103:3; 103:4 – 11		87:24-89:5; 8:12-9:2
102:23 – 103:3		50:7 – 14; 102:23 – 103:3; 103:4 – 11		87:24-89:5; 8:12-9:2
103:12 – 103:16		50:7 – 14; 102:23 – 103:3; 103:4 – 11		87:24-89:5; 8:12-9:2
104:10 – 104:17				
107:9 – 107:22		106:8 – 24; 109:18 – 110:4	* 402, 403, 602, 701-702	111:23-112:6
108:6 – 108:23		106:8 – 24; 109:18 – 110:4	* 402, 403, 602, 701-702	111:23-112:6
111:23 – 112:6				
118:23 – 119:4				
120:11 – 122:18				
123:11 – 123:16		123:25 – 124:15	602, 701-702	111:23-112:6
126:7 – 126:13		123:25 – 124:15	602, 701-702	111:23-112:6
133:25 – 134:8		133:11 – 19	402, 403	87:24-89:5; 8:12-9:2; 102:23-103:3; 103:12-16
134:13 – 134:16		133:11 – 19	402, 403	87:24-89:5; 8:12-9:2; 102:23-103:3; 103:12-16

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Deposition of Vernon Anthony[2]
May 16, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
6:13 - 11:1
40:13 - 41:5
43:16 - 45:10
46:20 - 47:9
56:24 - 57:4
57:22 - 59:25
60:19 - 61:23
223:7 - 234:11
326:22 - 327:17
338:1 - 338:23
339:18 - 340:15
342:8 - 343:15

[2] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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Deposition of Robert Barr[3]
May 27, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
8:1 – 12:7	401 – 403 re: 9:4 – 10:11:2	12:8 – 14		
14:12 – 16:8	401 – 403			
18:14 – 22:4	401 – 403 re: 18:14 – 20:11			
22:7 – 24:5	401 – 403 re: 24:2 – 5			
25:3 – 26:3	401 – 403			
26:10 – 26:22				
27:18 – 28:5				
28:9 – 33:9	401 – 403 re: 31:8 – 12; 32:11 – 33:9			
34:8 – 34:21	401 – 403			
35:4 – 38:12	401 – 403 re: 35:4 – 12; 37:15 – 38:12			
38:16 – 40:13				
45:9 – 45:13				
48:3 – 49:19	401 – 403	50:7 – 51:1; 52:3 – 7	401-403	49:20-50:6; 52:8-54:7
54:15 – 55:7	401 – 403			
55:20 – 56:17	401 – 403	50:7 – 51:1; 52:3 – 7	401-403	
58:7 – 64:2				
69:11 – 71:6				

[3] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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71:19 – 72:9				
73:8 – 73:13	401 – 403	73:14 – 22	non-responsive	
74:22 – 76:13	401 – 403			
77:10 – 81:9	401 – 403 re: 77:10 – 80:18	81:10 – 83:7	401-403; 701	
83:8 – 89:1	401 – 403 re: 87:15 – 89:1	81:10 – 83:7	401-403; 701	
89:16 – 90:11				
92:19 – 93:15		93:19 – 22	401-403; non-responsive	
94:1 – 103:22				
104:6 – 104:13				
105:7 – 105:16				
106:2 – 109:3				
109:20 – 110:5				
110:20 – 111:19				
112:6 – 116:11				
117:10 – 117:22				
118:4 – 119:19				
120:16 – 121:1		121:2 – 10	401-403; non-responsive	
121:18 – 121:22				
122:2 – 130:6	401 – 403 re: 121:10 – – 127:2; 128:15 – 130:6			
131:8 – 133:12				
135:10 – 135:13				
136:10 – 140:22	401 – 403 re: 140:12 – 22			
141:4 – 142:17	401 – 403 re: 141:19 – 142:1			
145:3 – 147:17	602 re: 145:18 – 146:11			
150:14 – 150:20				
151:12 – 151:22				

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157:3 – 160:19	401 – 403 re: 158:10 – 159:15	153:13 – 154:8; 154:15 – 155:9		154:9-14
161:21 – 162:10		163:16 – 164:1		164:2-13
170:7 – 171:22	401 – 403	172:10 – 17		
173:15 – 175:19	401 – 403	172:10 – 17		
177:9 – 180:5				
181:15 – 185:8				
185:16 – 187:7	401 – 403			

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Deposition of Mark Beckner[4]
June 14, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
8:15 – 8:18				
11:16 – 11:22	401 – 403			
73:17 – 74:9				
165:10 – 166:16		165:3 – 9; 167:11 – 18; 168:10 – 19		166:18 - 167:9

[4] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of Mark Carroll[5]
June 8, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
222:16 – 223:5	401 – 403			
444:15 – 446:15	401 – 403			

5 See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of Mark Carroll[6]
June 8, 2006

TELCORDIA'S COUNTER DESIGNATIONS
358:5-359:15
363:9-369:2
370:4-371:5
378:19-380:17
395:1-403:20
408:12-20

[6] The parties have not yet had an opportunity to exchange counter and reply designations or objections for these designations, but will work together to do so.

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Deposition of Jonathan Chao[7]
May 18, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
33:20 - 34:4
35:16 - 36:18
37:7 - 40:10
104:12 - 105:13
121:18 - 122:12
124:17 - 125:3
137:5 - 137:19
148:18 - 149:17
154:7 - 154:14
157:2 - 157:15
162:14 - 163:11
224:12 - 224:14
236:2 - 236:15
247:13 - 247:21
271:18 - 272:7
285:18 - 288:7
292:5 - 293:14
306:11 - 307:10
321:21 - 322:12
324:4 - 325:19
337:5 - 338:3

[7] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS
349:17 - 349:22

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Deposition of Yau – Chau Ching[8]
June 9, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
7:20 – 8:15	401 – 403			
75:15 – 76:8		76:9 – 14; 78:9 – 19		

[8] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of Jean – Yves Cochennec[9]
April 6, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
16:7 – 16:22				
19:2 – 20:7	602	20:11 – 19	602, 802	
22:6 – 22:12				
23:18 – 24:17				
26:9 – 26:18		26:20 – 23	*	
26:24 – 28:9				
36:16 – 37:7				
38:4 – 38:11		38:12 – 20		
40:9 – 41:7	401 – 403	41:8 – 21; 43:4 – 20; 43:24 – 44:6; 44:10 – 45:24; 46:12 – 21		
41:22 – 42:9	401 – 403	41:8 – 21; 43:4 – 20; 43:24 – 44:6; 44:10 – 45:24; 46:12 – 21		
43:21 – 43:23	401 – 403	41:8 – 21; 43:4 – 20; 43:24 – 44:6; 44:10 – 45:24; 46:12 – 21		
44:7 – 44:9	401 – 403	41:8 – 21; 43:4 – 20; 43:24 – 44:6; 44:10 – 45:24; 46:12 – 21		
46:22 – 47:8	401 – 403	41:8 – 21; 43:4 – 20; 43:24 – 44:6; 44:10 – 45:24; 46:12 – 21		

[9] * See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
47:24 – 48:6	401 – 403	47:20 – 23; 48:7 – 19		86:1-87:11; 88:21-89:17; 91:2-18
52:5 – 52:24	401 – 403	51:22 – 52:4; 105:7 – 13		86:1-87:11; 88:21-89:17; 91:2-18
53:24 – 54:11	401 – 403	51:22 – 52:4; 105:7 – 13		86:1-87:11; 88:21-89:17; 91:2-18
55:20 – 56:4				
56:22 – 57:3				
57:13 – 58:3	401 – 403			
58:10 – 59:24	401 – 403			
60:5 – 61:19	401 – 403			
62:17 – 62:25	401 – 403			
63:5 – 63:16	401 – 403			
63:20 – 64:7	401 – 403			
65:19 – 65:22		65:6 – 18	602, 802	
69:10 – 69:14				
69:19 – 71:2				
72:12 – 72:17				
73:14 – 74:12				
75:20 – 78:9				
83:16 – 83:21				
84:8 – 84:21	401 – 403			
86:17 – 87:11	401 – 403	87:12 – 25		88:21-89:17
88:21 – 89:13	401 – 403	89:14 – 90:11		90:12-91:18; 92:12-21
91:2 – 91:18	401 – 403			
92:22 – 93:5				
94:18 – 95:5	401 – 403			
104:13 – 104:19	401 – 403			

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Deposition of Rick Augusto dePinho[10]
May 4, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
43:9 – 44:11		42:10 – 43:8		
46:9 – 47:6				

[10] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of Rick Augusto dePinho[11]
May 5, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
128:16 – 133:22	401 – 403 re: 128:16 – 131:6; 602 re 131:7 – 133:22	134:1 – 135:5; 145:3 – 18	403, 602, 701	
136:3 – 136:18	602	134:1 – 135:5; 145:3 – 18	403, 602, 701	
137:1 – 141:22	602	134:1 – 135:5; 145:3 – 18	403, 602, 701	
148:15 – 148:20	602	148:21 – 149:11; 151:21 – 152:7	402, 403, 602, 701	
151:5 – 151:20	602	148:21 – 149:11; 151:21 – 152:7	402, 403, 602, 701	
154:1 – 168:20	401 – 403 re: 151:1 – 157:21; 162:3 – 168:20; 602	134:1 – 135:5; 145:3 – 18; 148:21 – 149:11; 151:21 – 152:7	402, 403, 602, 701	
218:20 – 221:11	401 – 403; 602	221:21 – 224:5	402, 403, 602, 701	
233:12 – 238:10	602	238:11 – 13		
239:5 – 241:5	non – responsive re: 241:2 – 5			

[11] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of Rick Augusto dePinho[12]
May 18, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
422:18 – 426:13	602 re: 422:18 – 424:22	426:14 – 18		426:19-429:4
429:5 – 432:13	602	432:14 – 433:7		433:8-434:12
439:11 – 440:4	602			
441:14 – 442:6		440:20 – 441:13		442:7-18
455:21 – 457:19	701	453:3 – 455:20; 458:6 – 459:4		460:2-15
498:12 – 499:11	602; 801 – 802; non – responsive	154:2 – 158:2; 174:18 – 175:11; 499:12 – 501:18; 502:12 – 16; 520:14 – 521:4; 771:20 – 773:7; 774:15 – 775:1	602, 701 re 771:20-773:7; 774:15-775:1	
501:19 – 502:11	602; 801 – 802; non – responsive	154:2 – 158:2; 174:18 – 175:11; 499:12 – 501:18; 502:12 – 16; 503:8 – 13; 520:14 – 521:4; 771:20 – 773:7; 774:15 – 775:1	602, 701 re 771:20-773:7; 774:15-775:1	
502:17 – 503:7	602; 801 – 802; non – responsive	154:2 – 158:2; 174:18 – 175:11; 499:12 – 501:18; 502:12 – 16; 503:8 – 13; 520:14 – 521:4; 771:20 – 773:7;	602, 701 re 771:20-773:7; 774:15-775:1	503:8-504:1

[12] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
		774:15 – 775:1		
504:2 – 505:8	602; 801 – 802	154:2 – 158:2; 174:18 – 175:11; 499:12 – 501:18; 502:12 – 16; 503:8 – 13; 520:14 – 521:4; 771:20 – 773:7; 774:15 – 775:1	602, 701 re 771:20-773:7; 774:15-775:1	505:9-15
510:17 – 513:2	401 – 403; 602		602, 701 re 771:20-773:7; 774:15-775:1	
516:22 – 519:19				521:6-14; 522:6-8
525:1 – 525:16	non – responsive			
550:9 – 553:12	non – responsive	555:11 – 21; 592:16 – 595:6; 595:10 – 597:4; 597:7 – 598:2; 598:12 – 599:13; 601:9 – 12; 602:1 – 5; 602:21 – 603:19; 604:7 – 12; 605:11 – 17; 610:1 – 612:3	602 re 555:11-21	600:4-601:8; 606:13-609:2
612:13 – 613:22		555:11 – 21; 592:16 – 595:6; 595:10 – 597:4; 597:7 – 598:2; 598:12 – 599:13; 601:9 – 12; 602:1 – 5; 602:21 – 603:19; 604:7 – 12; 605:11 – 17; 610:1 – 612:3	602 re 555:11-21	
676:6 – 676:13	602	676:16 – 18		
676:21 – 677:11	602	676:16 – 18; 677:19 – 678:1		

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
678:8 – 679:10	602	677:19 – 678:1; 679:11 – 680:7		
694:14 – 696:19		697:10 – 698:3		698:7-701:8
719:8 – 719:22	602	718:22 – 719:7; 720:1 – 21		721:3-723:6
763:7 – 765:7	602	760:14 – 763:6	402, 403, 602, 701	
767:6 – 768:3		766:3 – 767:3		
768:8 – 770:13		766:3 – 767:3		773:8-774:9
788:18 – 790:2	602			

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Deposition of Rick Augusto dePinho[13]
May 22, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
48:15 – 51:19	602; non – responsive	46:8 – 24; 51:20 – 52:10	402, 403	52:11-54:12
54:13 – 55:20	602; non – responsive	46:8 – 24; 51:20 – 52:10	402, 403	55:25-58:24; 59:23-63:17
85:14 – 86:25	602; non – responsive	87:1 – 10		
124:4 – 124:14	602	123:4 – 124:3	402, 403	
159:2 – 160:25	602; non – responsive	123:4 – 124:3; 162:21 – 163:4	402, 403 re 123:4 – 124:3; 602 re 162:21 – 163:4	
163:23 – 164:20	602	123:4 – 124:3; 162:21 – 163:4; 164:21 – 165:19	402, 403 re 123:4 – 124:3; 602 re 162:21 – 163:4; 164:21 – 165:19	165:20-167:9
174:5 – 175:7		172:24 – 174:4; 175:8 – 23	602 re 175:8 – 23	
205:16 – 207:13	non – responsive	204:12 – 205:11		
211:20 – 221:24		204:12 – 205:11		
225:4 – 226:13	602; non – responsive re: 216:21 – 220:3	221:25 – 223:5		
273:21 – 277:19	401 – 403	277:20 – 278:10; 279:23 – 280:21; 283:17 – 284:16	402, 403, 602	
278:11 – 279:22	401 – 403	277:20 – 278:10; 279:23 – 280:21; 283:17 – 284:16	402, 403, 602	280:22-281:12
281:20 – 282:17	401 – 403; 602	277:20 – 278:10; 279:23	402, 403, 602	

[13] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
		– 280:21; 283:17 – 284:16		
288:1 – 289:13	602			
289:21 – 292:23	602; non – responsive			

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Deposition of Lynn Erb[14]
March 31, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
4:15 – 7:22				
9:3 – 9:15	401 – 403			
20:1 – 24:15	401 – 403; 802 – 803 re: 19:20 – 22			
46:13 – 46:16	401 – 403			
91:6 – 94:3	401 – 403			
95:8 – 97:5	401 – 403			
98:8 – 100:12	401 – 403			
104:4 – 104:15	401 – 403			
108:1 – 108:21				
117:11 – 118:17	401 – 403			
121:8 – 122:8	401 – 403			
131:14 – 131:20	401 – 403			
133:9 – 135:5				
136:16 – 137:4	401 – 403			
137:22 – 139:10	401 – 403			
140:2 – 142:3				
142:14 – 143:1	401 – 403			
144:4 – 144:18	401 – 403			
150:8 – 151:1	401 – 403			
152:15 – 154:18				
156:7 – 169:22	401 – 403 re: 166:15 –			

[14] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
	167:12 401 – 403; 801 – 802 re: 168:1 – 169:22			
170:15 – 171:19				
172:1 – 181:22	801 – 802 re: 176:14 – 178:20			
182:11 – 183:10	801 – 802			
183:13 – 184:2	401 – 403			
185:11 – 185:21	401 – 403			

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Deposition of James Falk[15]
April 20, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
18:21 – 19:19				
20:1 – 21:4	602 re: 20:14 – 17			
21:8 – 21:15	401 – 403			
24:5 – 24:10	602	24:11 – 18		
34:22 – 35:6	602; 401 – 403	34:10 – 18		
36:7 – 36:14				
39:6 – 39:10	non – responsive	38:17 – 20		
39:19 – 40:6	801 – 802			
42:19 – 44:2	302; 801 – 802; non – responsive	44:7 – 11	402, 403, 602	
49:4 – 49:12		49:13 – 17		
93:12 – 94:4	602; non – responsive	94:6 – 21		
94:22 – 95:11	602	95:12 – 14		
95:21 – 96:17	602; non – responsive	96:18 – 97:11		
109:14 – 109:18	602			
110:13 – 110:21	602; non – responsive	111:1 – 8		
146:17 – 148:13	602; non – responsive	148:14 – 20; 149:4 – 11	402, 403, 602	
182:14 – 184:5	602; 801 – 802; non – responsive	184:7 – 9; 184:16 – 186:2	402, 403, 602	
184:10 – 184:15	801 – 802			
222:16 – 224:6	non – responsive			
228:1 – 229:2	602			

[15] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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229:13 – 230:11	602; non – responsive			
230:16 – 232:3	602			
235:7 – 236:19	602; 801 – 802	236:21 – 237:3		
237:4 – 241:22	602; non – responsive			
242:15 – 242:19	602			
243:1 – 244:14	602; 801 – 802			
245:19 – 246:7	401 – 403			
246:16 – 247:18	401 – 403; 801 – 802	246:8 – 11		
249:15 – 252:1	602	252:3 – 11	402, 403, 602	
253:17 – 254:1	602; 801 – 802	254:15 – 20, 255:2 – 15	402, 403, 602	

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Deposition of Guy Fedorkow[17]
May 9, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
8:18 – 8:22	401 – 403 re: 8:20 – 22			
24:7 – 26:6				
26:20 – 27:20		27:21 – 28:6		
29:6 – 29:17				
30:4 – 38:1	602 re: 30:4 – 34:5 701 re: 30:4 – 34:5 801 – 802 re: 30:4 – 34:5			
42:5 – 42:8	602; 801 – 802			
43:16 – 53:8	801 – 802			
54:5 – 55:11	801 – 802	55:12 – 22		
62:9 – 63:12	602; 801 – 802	57:7 – 12; 59:4 – 60:5		
64:3 – 65:22	801 – 802	57:7 – 12; 59:4 – 60:5; 66:1 – 13		66:14-17
70:13 – 75:6	801 – 802	75:7 – 16		
75:17 – 79:22	602; 801 – 802	75:7 – 16; 80:1 – 12		80:13-18
82:10 – 83:8	801 – 802			
85:15 – 87:19	602; 701; 801 – 802	59:4 – 60:5; 66:1 – 13		
91:22 – 95:5	602; 801 – 802	95:20 – 97:4		
99:16 – 104:2	801 – 802			

[17] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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108:5 – 110:10		111:6 – 18		
113:14 – 114:15		11:6 – 18		
120:4 – 121:9	801 – 802	116:4 – 19; 121:18 – 122:6		116:20-119:1
123:8 – 126:11	401 – 403; 602; 801 – 802	116:4 – 19; 121:18 – 122:6		
129:22 – 131:18	401 – 403; 602; 801 – 802	116:4 – 19; 121:18 – 122:6; 132:2 – 14		
169:19 – 171:4	401 – 403; 801 – 802	116:4 – 19; 121:18 – 122:6		
186:7 – 190:16	401 – 403	116:4 – 19; 121:18 – 122:6		
194:13 – 208:1	401 – 403 re: 194:13 – 202:16			
209:21 – 211:20	801 – 802			
214:8 – 224:21	602 re: 218:2 – 218:13; 220:11 – 221:20; 223:16 – 224:21 801 – 802 re: 218:2 – 218:13; 220:11 – 221:20; 223:16 – 224:21			

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Deposition of Paul Fleischer[18]
May 11, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
23:8 - 23:13
37:7 - 28:3
28:14 - 32:17
37:9 - 38:22
39:20 - 40:2
41:9 - 41:13
41:16 - 42:3
44:12 - 44:18
53:1 - 53:12
55:11 - 55:21
91:7 - 92:4
92:13 - 92:17
93:10 - 95:12
96:10 - 98:12
98:19 - 99:1
101:6 - 101:8
102:16 - 103:6
104:2 - 104:7
104:16 - 104:20
105:2 - 105:7
107:10 - 107:17

[18] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS
109:18 - 110:13
111:7 - 113:15
115:8 - 117:13
118:2 - 118:8
119:3 - 119:12
119:22 - 120:10
120:18 - 121:19
122:12 - 122:14
123:10 - 123:19
124:22 - 125:19
126:6 - 126:9
126:20 - 127:6
128:1 - 128:10
132:8 - 132:19
135:3 - 135:21
136:20 - 137:19
139:14 - 140:2
140:14 - 141:2
141:7 - 141:15
141:20 - 142:5
142:14 - 142:16
142:20 - 143:3
143:11 -143:15
144:10 - 144:19
145:12 - 145:15
145:22 - 146:15
151:16 - 151:1
153:22 - 155:4
156:16 - 157:14

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TELCORDIA'S DEPOSITION DESIGNATIONS
157:18 - 159:17
160:18 - 161:6
162:4- 162:17
163:7 - 164:11
165:15 - 165:20
166:2 - 166:12
167:14 - 168:5
168:14 - 169:3
169:6 - 169:13
169:22 - 170:22
171:17 - 172:3
172:12 - 173:9
176:17 - 176:21
177:10 - 177:14
178:5 - 178:18
179:9 - 179:15
180:2 - 180:22
181:21 - 182:7
182:16 - 183:6
183:15 - 184:12
194:12 - 195:1
196:5 - 196:18
203:12 - 203:19
204:5 - 204:9
213:8 - 213:14
216:1 - 216:8
226:5 - 226:9
227:10 - 227:13
228:12 - 229:1

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TELCORDIA'S DEPOSITION DESIGNATIONS
229:20 - 230:19
231:3 - 231:18
231:21 - 232:1
232:8 - 232:16
232:20 - 233:13
234:3 - 234:11
236:16 - 237:1
238:4 - 240:13
240:17 - 242:17
243:8 - 243:19
245:15 - 247:18
249:14 - 250:20
251:2 - 251:4
255:19 - 255:22
256:9 - 256:19
257:5 - 257:17
259:5 - 261:7
262:8 - 262:14
263:4 - 263:21
270:10 - 270:16
271:3 - 271:16
272:6 - 273:6
273:9 - 273:19
274:13 - 274:17
275:9 - 276:8
277:7 - 277:22
278:19 - 279:20
280:9 - 280:21
281:3 - 282:18

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TELCORDIA'S DEPOSITION DESIGNATIONS
283:3 - 283:8
286:14 - 287:8
290:4 - 290:13
293:14 - 294:19
297:20 - 300:16
301:13 - 303:20

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Deposition of Paul Fleischer[19]
May 12, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
322:4 - 322:10
323:21 - 324:6
325:12 - 325:19
326:12 - 328:7
328:14 - 329:2
329:6 - 330:21
331:7 - 331:14
333:14 - 335:17
336:3 - 336:19
337:1 - 338:21
339:1 - 339:13
340:7 - 341:19
342:8 - 342:15
343:5 - 347:21
348:15 - 349:6
349:14 - 350:4
352:1 - 352:20
359:9 - 359:16
361:11 - 361:13
362:3 - 363:18
365:3 - 365:14

[19] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS
365:17 - 365:22
366:11 - 366:17
367:1 - 369:7
370:2 - 371:10
371:14 - 373:7
375:8 - 377:6
377:15 - 378:2
378:19 - 379:19
381:13 - 381:18
382:1 - 382:13
383:6 - 384:15
386:6 - 387:20
389:11 - 390:20
391:4 - 391:9
393:11 - 394:5
395:4 - 395:10
395:19 - 396:2
396:7 - 397:1
397:10 - 397:15
398:19 - 399:21
401:15 - 402:1
403:9 - 403:22
404:9 - 406:3
406:11 - 408:10
410:8 - 411:1
411:12 - 412:15
413:10 - 413:19
413:22 - 416:20
417:11 - 418:20

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TELCORDIA'S DEPOSITION DESIGNATIONS
419:15 - 420:7
420:22 - 421:12
421:22 - 422:4
423:8 - 424:3
424:18 - 425:17
426:8 - 426:20
431:2 - 431:14
432:17 - 432:20
433:22 - 435:18
436:21 - 437:10
438:2 - 438:10
438:15 - 440:13
441:7 - 442:2
444:11 - 444:15
446:3 - 446:13
447:13 - 448:13
449:77 - 449:20
450:2 - 451:8
452:22 - 454:12
455:13 - 458:11
463:6 - 465:13
466:14 - 467:1
467:6 - 467:12
468:10 - 469:2
470:9 - 471:19
476:9 - 476:17
478:12 - 478:15
482:3 - 483:22
484:16 - 485:17

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TELCORDIA'S DEPOSITION DESIGNATIONS
486:8 - 488:21
489:10 - 490:12
490:17 - 491:11
492:10 - 492:16
193:12 - 496:21
497:9 - 500:6
501:13 - 501:20
502:9 - 502:15
503:3 - 505:15
505:21 - 507:18
508:1 - 508:16

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Deposition of Greg Fujii[20]
May 31, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
9:10 – 10:4				
10:22 – 11:4				
12:12 – 13:13				
15:3 – 15:20				
16:10 – 16:13				
19:4 – 20:5				
20:18 – 21:9				
24:1 – 24:7				
24:13 – 25:6	401 – 403			
25:11 – 27:1	401 – 403			
28:8 – 28:14				
30:14 – 31:2				
31:22 – 32:4				
32:21 – 33:11				
33:22 – 35:3				
35:22 – 36:11				
38:4 – 38:7	401 – 403			
51:22 – 52:20	801 – 802			
54:3 – 54:22	801 – 802			
58:3 – 58:12	801 – 802			
62:1 – 64:4				

[20] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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64:11 – 66:3	401 – 402 re: 64:11 – 65:17			
66:11 – 66:14				
67:16 – 67:20				
68:13 – 69:5				
69:14 – 70:3	401 – 402			
71:4 – 71:10				
71:22 – 72:4				
72:15 – 72:18				
73:4 – 74:10	401 – 403			
75:22 – 76:21	401 – 403			
77:22 – 78:5	401 – 403			
79:16 – 81:5	401 – 403 re: 79:16 – 80:11			
81:8 – 81:15				
82:16 – 84:5	401 – 403			
84:18 – 85:4	401 – 403			
85:7 – 85:13				
90:8 – 92:4	401 – 403			
94:10 – 94:22	401 – 403; 801 – 802	95:1 – 10		86:9-90:7; 95:11-96:8
96:9 – 96:16				
109:12 – 110:12		110:13 – 20; 112:6 – 14		
111:13 – 112:5				
112:15 – 114:2	401 – 403			
114:9 – 120:11	401 – 403 re: 114:9 – 119:10	122:11 – 123:10		123:11-19
134:16 – 136:2				
137:17 – 141:22		122:11 – 123:10		123:11-19
142:18 – 144:10				
150:21 – 151:10		214:2 – 215:12	401-403	
153:8 – 154:12				
178:4 – 178:10				

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189:4 – 190:5	401 – 403	188:4 – 189:3		
190:9 – 191:19	401 – 403			
195:11 – 197:17	401 – 403			
199:17 – 199:22				
202:13 – 203:2	401 – 403			
215:13 – 217:7	401 – 403	214:2 – 215:12		
217:22 – 218:20				

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Deposition of Mark Garrett[21]
May 11, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
8:16 - 9:4
54:2 - 55:4
122:8 - 124:18
125:4 - 126:2
128:17 - 129:3
143:15 - 148:12
163:20 - 164:13
185:14 - 186:19
196:15 - 199:1
226:10 - 229:21

[21] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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Deposition of Mark Garrett[22]
June 1, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
4:17 - 4:20
5:6 - 5:11
149:15 - 152:21
163:12 - 163:25
169:15 - 170:17
173:23 - 176:20
177:15 - 178:7
184:18 - 187:21
190:16 - 193:14
196:14 - 197:1
200:12 - 201:4
203:20 - 204:23
206:6 - 208:1
259:14 - 260:6

[22] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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Deposition of Zachary Gilstein[23]
May 12, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
261:20 - 261:22
264:11 - 265:7
269:4 - 270:22
276:13 - 277:1
279:19 - 280:5
284:4 - 285:3
285:8 - 287:8
300:1 - 302:19
303:14 - 304:10
402:7 - 406:13
409:21 - 414:8
415:14 - 415:22

[23] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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Deposition of Zachary Gilstein[24]
May 22, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
5:17 - 9:4
12:5 - 12:23
15:10 - 16:5
17:12 - 22:9
31:18 - 31:21
40:15 - 40:23
62:17 - 63:8
66:4 - 67:15
71:6 - 71:20
74:23 - 75:14
80:5 - 83:19
86:18 - 87:4
88:14 - 89:17
93:10 - 93:12
96:1 - 96:7

[24] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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Deposition of Joseph Giordano[25]
May 10, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
6:17 - 7:6
7:12 - 8:19
11:24 - 12:2
29:12 - 31:11
33:17 - 33:24
35:23 - 36:8
44:16 - 45:12
45:18 - 45:24
46:17 - 46:25
57:16 - 60:20
68:6 - 68:23
69:3 - 69:17
70:6 - 71:14
73:19 - 74:3
79:20 - 80:18
82:4 - 83:15
83:25 - 84:9
84:20 - 85:9
85:21 - 86:5
86:22 - 87:4
100:9 - 101:22

[25] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS
103:15 - 104:17
106:7 - 106:11
132:10 - 133:13
138:18 - 139:5
145:5 - 145:14
146:15 - 146:22
149:23 - 150:4
151:20 - 152:21
154:22 - 155:14
159:5 - 159:8
159:13 - 160:3
160:15 - 160:21
166:7 - 166:13
181:19 -182:10
182:19 - 184:5
185:19 - 186:10
188:22 - 190:1
192:2 - 192:18
193:18 - 194:13
195:11 - 195:15
201:10 - 204:14
212:5 - 215:1
215:14 - 215:21
257:22 - 258:11

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Deposition of Brian Holden[26]
May 22, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
8:21 – 9:6				
12:5 – 12:18				
13:15 – 17:2	801 – 802; 401 – 403 re: 16:1 – 19			
17:10 – 20:6	401 – 403 re: 19:12 – 20:6			
20:8 – 22:16	401 – 403 re: 20:7 – 18	21:6 – 14		
23:5 – 24:13				
24:20 – 33:5		30:10 – 16; 32:6 – 33:5		
33:8 – 33:14	401 – 403			
34:1 – 40:8	401 – 403			
40:19 – 43:6	401 – 403 re: 40:19 – 41:18 602; 801 – 802 re: 41:19 – 42:13			
43:14 – 45:11	602 re: 44:4 – 19			
47:15 – 48:2	401 – 403; 801 – 802 re: 45:8 – 11			
48:13 – 49:11				
49:20 – 50:2				
50:17 – 50:20				

[26] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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51:17 – 53:22	401 – 403; 602 re: 51:17 – 52:10			

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Deposition of Thierry Houdoin[27]
April 5, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
5:3 – 5:5	401 – 403			
7:7 – 8:7	401 – 403			
9:9 – 9:15	401 – 403	9:16 – 23		130:5 - 16
10:2 – 10:4				
13:6 – 13:11		13:12 – 17		
13:18 – 13:23				
16:8 – 16:16				
22:3 – 23:9				
25:7 – 27:3				
28:3 – 28:15				
29:6 – 30:15				
32:13 – 32:20				
32:25 – 33:10				
37:5 – 38:12				
41:8 – 42:15				
42:25 – 43:15	602 re: 43:7 – 15			
44:19 – 45:15	602 re: 45:1 – 15			
46:11 – 47:6		47:7 – 48:5	*	
49:2 – 50:14				
57:22 – 58:9		58:10 – 23	*	
59:12 – 59:21		59:22 – 60:8	402, 403, 602, 802	95:7 - 10
60:24 – 61:6	401 – 403			

[27] * See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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69:15 – 70:6		67:4 – 69:14	402, 403, 602, 701 - 702, 802, 1002	110:24 - 112:3
72:2 – 72:22				
73:16 – 74:22		74:23 – 75:10	*	
76:21 – 78:4		78:5 – 9; 79:7 – 18	402, 403, 701 - 702, 1002	78:12, 110:24 - 112:3
79:19 – 80:2		80:3 – 23	402, 403, 701 - 702, 1002	110:24 - 112:3
85:14 – 86:18	602	88:19 – 89:3; 90:4 – 12	*	
86:25 – – 89:10	602	88:19 – 89:3; 90:4 – 12	*	
90:4 – 90:12				
92:12 – 92:16		92:17 – 25		9:9 - 15
93:2 – 94:7		94:8 – 15		
95:7 – 95:10				
96:4 – 97:3				
97:7 – 97:13				
97:20 – 99:13				
99:19 – 99:21				
100:5 – 101:5	401 – 403			
101:12 – 104:7	401 – 403			
107:9 – 108:23				
109:17 – 109:23				
110:24 – 112:3	401 – 403	112:4 – 15	402, 403, 602, 701 - 702, 1002	
112:16 – 112:18	401 – 403			
114:22 – 117:7				
117:16 – 118:8	401 – 403			
118:15 – 119:8				
119:12 – 119:23				
122:9 – 122:12				
123:6 – 124:3				
127:8 – 128:9		125:11 – 21; 129:10 – 21	* 402, 403, 602, 701 - 702, 1002	128:22 - 129:9
129:15 – 129:19	401 – 403; 602			

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130:5 – 130:16	401 – 403; 602			
131:21 – 132:5				
132:9 – 132:22	401 – 403			
133:13 – 133:15	401 – 403			

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Deposition of Vincent Jones[2829]
August 15, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
9:20 – 10:12	401 – 403, 802 – 803			
66:20 – 67:19	401 – 403, 802 – 803	58:7 – 59:21; 66:3 – 19; 69:14 – 70:3	403	
87:20 – 88:5	401 – 403, 802 – 803	73:9 – 14; 87:1 – 4	403	
96:22 – 97:3	401 – 403, 802 – 803	97:4 – 13	403	
103:18 – 113:1	401 – 403, 802 – 803			
114:4 – 133:3	401 – 403, 802 – 803			
150:9 – 158:16	401 – 403, 802 – 803			
183:10 – 184:4	401 – 403, 802 – 803			
190:7 – 191:9	401 – 403, 802 – 803	192:4 – 193:10		
224:2 – 237:18	401 – 403, 802 – 803			

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28 See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

29 Defendants object to the designation of testimony from Dr. Jones pursuant to Rules 401-403 and 802-803. As previously noted, Defendants do not intend to present Dr. Jones as their expert witness. Dr. Jones was initially selected by Alcatel as an expert regarding invalidity and unenforceability of the '633 patent. After Alcatel stayed its litigation before this court, Defendants Cisco and Lucent, in an effort to simplify the trial process by reducing the number of experts testifying before the jury, desired to have Dr. Acampora serve as their expert for the case-in-chief and rebuttal on invalidity, enforceability, and non-infringement issues concerning the '633 patent. Defendants Cisco and Lucent informed Telcordia that Dr. Acampora would adopt Dr. Jones' report as his own and submit a rebuttal report on invalidity and unenforceability. After Dr. Acampora did so, Telcordia filed a motion objecting to Defendants' use of Dr. Acampora as their expert on invalidity and unenforceability in the case-in-chief. Telcordia's motion was denied without prejudice. Defendants reserve the right to supplement their objections and counter designations as necessary pending any further rulings on Telcordia's motion. For its part, Telcordia incorporates its arguments set forth in its Motion *in Limine* No. 2.

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263:5 – 267:8	401 – 403, 802 – 803			

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Deposition of James Jordan[30]
February 16, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
4:24 – 7:11				
8:18 – 10:12	401 – 403			
13:6 – 14:13	401 – 403; 802 – 803			
15:2 – 15: 9	401 – 403			
18:3 – 18:18	401 – 403 re: 18:3 – 11			
20:19 – 21:21	401 – 403 re: 24:12 – 17			
22:3 – 26:24	401 – 403; 802 – 803			
28:3 – 28:11				
28:21 – 30:2	401 – 403 re: 28:21 – 25			
33:4 – 35:16	401 – 403			
37:16 – 37:23	401 – 403			
38:4 – 38:17	401 – 403			
39:12 – 41:15	401 – 403			
42:9 – 43:1	401 – 403			
43:9 – 45:6	401 – 403			
45:12 – 45:25	401 – 403			
46:17 – 50:10	401 – 403			
50:19 – 52:8				
53:21 – 54:25	602 re: 54:6 – 25			
58:2 – 59:3				

[30] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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65:22 – 67:1				
67:22 – 68:17	401 – 403			
72:14 – 76:6	401 – 403			
81:13 – 84:20	401 – 403			
115:22 – 117:11	401 – 403			
126:12 – 127:25	401 – 403			

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Deposition of James Keyes[31]
June 21, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
9:18 – 10:22				
11:12 – 12:3				
12:13 – 16:21	401 – 403 re: 12:13 – 15:11			
17:5 – 18:6				
18:17 – 20:7				
20:15 – 22:15				
23:20 – 25:18	401 – 403			
26:4 – 27:22	401 – 403			
28:5 – 32:15	401 – 403 re: 28:5 – 29:14; 30:10 – 32:15			
33:1 – 40:12	401 – 403 re: 33:1 – 36:12; 37:22 – 40:12			
41:6 – 43:6				
44:8 – 46:8	401 – 403			
46:15 – 51:19				
52:1 – 52:2				
54:2 – 62:1	401 – 403 re: 55:18 – 62:1			
62:15 – 71:22	401 – 403 re: 62:15 – 71:14			
72:5 – 73:16				

[31] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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73:22 – 76:4	401 – 403			
76:17 – 81:6	401 – 403; 801 – 802			
81:16 – 84:12	401 – 403			
84:18 – 87:16	401 – 403			
88:4 – 90:8	401 – 403			
91:6 – 95:21	401 – 403; 801 – 802			
97:16 – 98:8	401 – 403			
98:19 – 98:22	401 – 403; 801 – 802			
99:12 – 101:5	401 – 403; 801 – 802			
101:13 – 110:7	401 – 403; 801 – 802			
113:5 – 116:4				
117:1 – 119:4				
119:22 – 120:6				
120:13 – 133:15	401 – 403 re: 226:18 – 133:15 801 – 802 re: 226:18 – 133:15			
134:4 – 135:6				
135:22 – 138:2	401 – 403; 801 – 802			
138:10 – 140:7	401 – 403			
140:9 – 145:2				
145:14 – 146:19				
147:5 – 147:9				
147:17 – 148:2	401 – 403			
149:11 – 150:2		149:8 – 10		
150:15 – 153:8	401 – 403			
153:10 – 167:2	401 – 403; 801 – 802 re: 153:10 – 156:21; 159:5 – 166:5			
167:7 – 168:3	401 – 403			
168:7 – 169:22	401 – 403			

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170:15 – 178:17	401 – 403; 801 – 802			
179:7 – 185:2	401 – 403; 801 – 802			

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Deposition of Bruce Kittams[32]
April 28, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
6:23 – 6:24				
7:23 – 8:3				
10:24 – 11:3				
11:10 – 11:17	602	11:4 – 9	*	
12:12 – 13:16				
14:6 – 14:9				
15:14 – 16:17				
17:6 – 17:11				
17:16 – 18:20				
19:1 – 19:13	404, 608, 801 – 802			
21:17 – 26:10				
27:1 – 28:8				
30:1 – 32:11	602	32:12 – 15		
32:16 – 33:15	401 – 403, 602, 801 – 802			
34:13 – 36:16	602, 801 – 802			
37:23 – 38:3	401 – 403, 404	178:17 – 181:25; 186:25 – 187:10	*	
39:4 – 39:6	401 – 403			
39:10 – 41:2	401 – 403			
49:6 – 49:9				
52:13 – 52:24				

[32] * See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
57:8 – 57:18	401 – 403			
59:12 – 59:20	401 – 403			
60:20 – 61:7	401 – 403			
64:6 – 64:22	401 – 403, 602			
65:4 – 65:23				
66:8 – 66:15				
69:23 – 70:9				
71:13 – 71:19	401 – 403, 801 – 802	71:20 – 72:2		
74:4 – 74:12	602	74:13 – 21	*	
75:2 – 75:9				
75:17 – 75:21				
76:15 – 76:18				
77:9 – 78:13				
80:16 – 80:22				
84:2 – 84:25	404, 608, 801 – 802			
85:5 – 86:8	401 – 403, 602, 701 – 702	78:4 – 13; 86:9 – 13; 94:15 – 95:3; 163:25 – 164:14	602	109:16 - 110:14, 153:23 - 154:21, 159:10 - 160:5
86:14 – 87:20		78:4 – 13; 86:9 – 13; 94:15 – 95:3; 163:25 – 164:14	602	
88:1 – 88:10	401 – 403, 602, 701 – 702	78:4 – 13; 86:9 – 13; 94:15 – 95:3; 163:25 – 164:14	602	
89:17 – 90:2				
90:15 – 91:8				
92:19 – 93:24	401 – 403, 602			
94:2 – 94:14				
95:4 – 98:11	401 – 403, 602, 701 –			

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
	702, 801 – 802			
99:12 – 99:18				
100:14 – 101:4				
102:1 – 102:4	602	125:5 – 9	*	
109:16 – 110:14	602, 701 – 702			
111:13 – 112:4				
113:1 – 113:22	602			
114:13 – 115:1				
118:3 – 118:6				
118:13 – 118:23				
119:19 – 119:24				
120:23 – 122:15				
123:5 – 123:13		123:14 – 124:4	*	
124:24 – 125:3		168:21 – 24, 169:6 – 17	* 402, 403, 602, 802	121:10 - 25
125:23 – 126:1		52:4 – 16	402, 403	52:17 - 24
127:2 – 127:6				
127:10 – 127:17				
127:23 – 128:1				
129:2 – 129:19	401 – 403			
131:25 – 132:3				
132:22 – 134:10				
134:14 – 134:19				
135:1 – 135:22				
136:4 – 136:12	401 – 403, 602, 701	138:19 – 22	1002	
137:11 – 137:14	401 – 403, 602, 701			
137:18 – 138:9	401 – 403, 602, 701			
142:20 – 143:3	401 – 403			
144:2 – 144:10	401 – 403, 602, 701			
145:18 – 146:9	602			

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
152:4 – 152:15		152:16 – 24	402, 403, 602, 701 - 702	109:16 - 110:14, 153:23 - 154:21, 159:10 - 160:5
153:23 – 154:21	602, 701 – 702, 801 – 802			
158:24 – 160:5	401 – 403			
162:2 – 163:10	602, 702			
164:17 – 165:25				
166:14 – 166:20		166:21 – 167:5	*	
167:9 – 168:24				
170:6 – 171:17	801 – 802			
177:8 – 177:15		177:18 – 23		200:1 - 202:16
183:8 – 183:18		183:19 – 184:12	*	
189:2 – 189:13	401 – 403			
189:18 – 190:4	401 – 403	190:5 – 11		
190:12 – 192:7	401 – 403			
193:7 – 193:13				
196:10 – 197:1				
199:8 – 199:12	602, 701			
200:1 – 202:16	401 – 403	178:17 – 181:25; 186:25 – 187:10	*	
204:13 – 204:17				
209:23 – 210:2				
214:13 – 214:24				
216:16 – 216:17				

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Deposition of Richard Lau[33]
May 4, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
8:17 - 8:19
10:20 - 16:8
17:2 - 17:10
18:19 - 18:22
20:18 - 22:3
23:10 - 23:20
26:22 - 27:19
28:9 - 29:15
32:8 - 32:16
33:18 - 34:4
35:8 - 35:12
36:6 - 36:11
36:17 - 36:19
37:14 - 38:1
40:17 - 40:22
41:22 -42:16
43:15 - 44:14
45:21 - 46:20
48:4 - 48:11
49:9 - 50:1
51:4 - 51:11

[33] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS
53:21 - 56:10
57:3 - 57:5
57:16 - 57:19
58:3 - 58:10
59:12 - 59:16
60:2 - 60:8
61:22 - 62:7
62:13 - 64:19
65:2 - 65:5
65:19 - 66:9
67:1 - 67:14
67:20 - 68:7
68:12 - 69:2
69:16 - 70:2
70:4 - 71:16
71:21 - 72:3
72:18 - 74:20
75:13 - 75:21
76:18 - 77:5
77:9- 77:19
78:10 - 80:2
80:9 - 83-12
84:6 - 85:1
85:22 - 86:17
87:6 - 87:16
87:20 - 88:16
90:18 - 91:1
92:2 - 92:16
93:5 - 93:12

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TELCORDIA'S DEPOSITION DESIGNATIONS
94:15 - 95:22
96:7 - 96:11
97:2 - 98:2
101:19 - 102:6
102:17 - 103:6
104:12 - 112:15
112:18 - 115:17
115:20 - 118:20
120:12 - 125:19
126:10 - 128:17
129:3 - 129:8
129:21 - 130:1
130:5 - 131:17
132:4 - 133:14
134:19 - 137:10
139:17 - 140:19
141:20 - 143:3
144:8 - 144:19
147:18 - 148:10
149:13 - 149:21
150:1 - 154:7
155:6 - 155:12
156:10 - 160:4
160:9 - 161:11
163:7 - 164:22
166:1 - 166:14
166:20 - 167:12
169:6 - 169:14
173:20 - 174:6

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TELCORDIA'S DEPOSITION DESIGNATIONS
175:6 - 177:15
178:7 - 179:22
180:3 - 186:10
189:3 - 190:9
191:5 - 192:13
192:18 - 195:18
196:5 - 197:16
198:18 - 199:10
199:21 - 203:19
204:6 - 205:11
207:17 - 209:21
210:8 - 211:9
211:14 - 214:2
214:8 - 215:3
215:10 - 220:20
220:15 - 220:20
222:6 - 222:14
223:21 - 226:6
226:21 - 227:7
228:3 - 230:1
230:14 - 231:12
237:14 - 238:7
239:21 - 240:7
241:1 - 241:8
241:12 - 243:20
245:12 - 245:18
247:20 - 248:16
252:4 - 252:19
253:5 - 254:19

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TELCORDIA'S DEPOSITION DESIGNATIONS
254:22 - 255:14
261:22 - 262:3
264:5 - 264:7
265:11 - 266:13
266:20 - 268:20
271:10 - 272:20
273:3 - 273:6
274:4 - 274:9
275:16 - 277:7
277:15 - 278:6
278:9 - 281:22
282:11 - 282:17
282:20 - 284:3
284:7 - 285:15
289:5 - 290:14
293:1 -294:10
296:2 - 296:20
297:15 - 300:12
302:7 - 302:17

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Deposition of Richard Lau[34]
May 5, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
316:5 - 316:11
333:5 - 333:12
340:13 - 340:22
341:11 - 342:21
343:1 - 343:15
344:5 - 344:22
350:5 - 350:21
351:16 - 351:22
352:17 - 353:1
355:8 - 355:16
355:19 - 356:5
359: 21 - 362:22
363:17 - 364:9
365:12 - 365:22
366:11 - 366:17
368:14 - 368:22
369:12 - 369:21
370:14 - 370:20
371:17 - 372:3
372:16 - 373:17
373:22 - 374:7

[34] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS
374:21 - 275:18
379:8 - 381:11
382:4 - 383:13
385:12 - 386:12
387:1 - 387:13
389:2 - 391:15
392:1 - 392:13
392:19 - 394:7
394:19 - 396:3
399:13 - 401:16
402:1 - 406:9
408:17 - 409:20
410:13 - 411:12
411:20 - 413:12
413:19 - 414:4
415:8 - 415:21
417:8 - 417:16
418:2 - 418:11
425:6 - 425:11
427:7 - 427:13
429:11 - 429:14
430:7 - 430:10
430:15
430:18 - 431:11
431:14 - 432:11
433:4 - 433:12
433:22 - 434:6
434:11 - 434:18
441:14 - 442:1

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TELCORDIA'S DEPOSITION DESIGNATIONS
442:17 - 442:20
443:8 - 444:7
444:11 - 444:21
445:12 - 446:2
446:7 - 446:17
447:8 - 448:3
448:7 - 448:12
449:14 - 449:21
450:18 - 451:12
452:21 - 453:7
454:16 - 457:1
457:6 - 457:11
457:17 - 458:16
458:18 - 462:5
462:19 - 465:11
465:16 - 467:12
468:5 - 470:21
471:3 - 471:5
472:17 - 473:4
476:15 - 477:5
477:19 - 478:3
492:21 - 493:21
500:4 - 500:7
500:20 - 501:5
502:8 - 503:6
504:6 - 504:13
505:5 - 506:10
507:7 - 507:18
508:17 - 509:9

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TELCORDIA'S DEPOSITION DESIGNATIONS
510:15 - 512:12
513:9 - 513:13
514:6 - 514:17
515:13 - 516:17
517:6 - 518:4
518:8 - 518:20
519:7 - 519:10
520:4 - 520:9
520:12 - 522:4
522:15 - 523:12
523:21 - 526:9
526:21 - 529:10
529:13 - 530:11
530:16 - 530:20
531:00 - 532:17
533:20 - 534:19
535:9 - 536:10
537:22 - 539:2
539:7 - 539:11
539:18 - 541:5
544:19 - 545:5
547:1 - 547: 10
549:3 - 549:15
552:11 - 552:16
553:8 - 553:12
554:12 - 555:1
557:7 - 557:13
557:20 - 558:9
559:1 - 559:5

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TELCORDIA'S DEPOSITION DESIGNATIONS
560:17 - 561:4
561:14 - 562:13
563:6 - 563:11
563:21 - 565:16
566:6 - 567:1
567:4 - 567:16
569:1 - 569:14
570:8 - 572:19
573:7 - 575:9
575:13 - 577:7
578:9 - 579:3
580:1 - 580:2
580:7 - 580:8
580:20 - 583:10
587:8 - 587:16
588:5 - 588:16
589:12 - 590:16
591:10 - 591:22
592:4 - 592:8
592:20 - 593:3
593:11 - 593:13
594:8 - 594:19
595:7 - 595:15
596:6 - 596:12
597:1 - 597:8
599:13 - 602:4
602:10 - 602:21
603:5 - 603:9
604:7 - 604:22

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TELCORDIA'S DEPOSITION DESIGNATIONS
606:4 - 607:12
609:8 - 610:1
610:10 - 610:13
611:10 - 612:15
614:20 - 614:22
617:9 - 618:9
625:12 - 627:2
627:18 - 628:8
629:2 - 629:12
629:17 - 630:1
630:4 - 632:19
633:1 - 633:10
634:2 - 634:4
634:8 - 634:11
634:22 - 635:9
635:19 - 636:16
637:4 - 637:12
638:16 - 638:21
640:2 - 641:2
641:10 - 641:15
643:1 - 643:8
644:17 - 645:12
645:22 - 646:8
646:17 - 649:3
649:15 - 650:21
651:15 - 653:3
654:5 - 654:20
655:5 - 655:13
657:1 - 657:12

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TELCORDIA'S DEPOSITION DESIGNATIONS
659:8 - 661:6
661:15 - 663:1
663:13 - 664:17
665:10 - 666:19
667:6 - 667:19
670:3 - 671:1
671:4 - 671:15
671:17 - 672:13
673:20 - 674:11
675:16 - 677:3
677:13 - 678:7
678:15 - 678:17
678:21 - 679:6
679:19 - 680:2

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Deposition of Tony Tong Lee[35]
June 11, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
5:6 – 5:10				
6:10 – 7:13				
8:4 – 8:18				
9:8 – 9:24				
10:18 – 10:22				
18:12 – 19:22				
21:4 – 21:6				
24:8 – 24:25		25:1 – 22		
26:15 – 27:12				
27:23 – 28:14		28:15 – 29:11		31:10-15
66:10 – 66:13	non – responsive	67:19 – 22		
70:11 – 70:14	non – responsive	69:21 – 70:25		
73:2 – 73:5		72:11 – 73:1		
85:16 – 85:18	non – responsive	85:19 – 86:5		
89:12 – 89:16		88:9 – 19		
104:24 – 105:6		105:7 – 11		
108:7 – 108:9	non – responsive	107:24 – 108:15; 109:14 – 110:7		
111:11 – 111:18		111:2 – 111:10		
120:3 – 120:5		120:6 – 9		
132:24 – 133:22		133:23 – 134:5		

[35] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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173:14 – 173:22		173:1 – 13; 173:24 – 174:2		
184:22 – 185:10		183:22 – 184:21; 185:11 – 17		
210:7 – 210:12	non – responsive	210:13 – 211:9	402, 403 re: 210:22 - 211:3	
300:9 – 300:21	non – responsive	300:22 – 301:3		
302:12 – 303:1	non – responsive	303:2 – 306:19		

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Deposition of Michael McCormick[36]
May 23, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
6:16 – 7:11				
10:12 – 12:4				
20:6 – 25:17				
26:10 – 26:20	401 – 403			
29:11 – 31:18	401 – 403			
33:7 – 39:22	401 – 403			
40:10 – 45:7	401 – 403 re: 40:10 – 44:8			
50:6 – 51:10	401 – 403 re: 50:6 – 21 401 – 403 re: 50:22 – 51:10			
52:7 – 54:12				
62:14 – 74:9	401 – 403			
79:11 – 82:17				
109:10 – 121:17	401 – 403			
122:12 – 145:20	401 – 403; 802 – 803			
152:3 – 157:10				
165:1 – 169:3	401 – 403; 602; 802 – 803			

[36] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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171:7 – 177:2	401 – 403; 602; 802 – 803			
178:2 – 179:13	401 – 403; 602; 802 – 803			
187:3 – 187:18	401 – 403			

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Deposition of Dawn McKenna[37]
May 18, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
8:21 – 9:2				
11:2 – 11:13				
12:4 – 12:22	401 – 403 re: 12:15 – 22			
15:20 – 15:22		12:21 – 22		
16:10 – 16:17	602	16:1 – 8; 16:18 – 20		
16:21 – 17:7	602			
17:19 – 18:9				
19:6 – 19:12		19:1 – 4; 19:13 – 16		
21:8 – 21:19	602			
22:15 – 23:8	801 – 802; 602	23:9 – 24:21		24:22-25:11
25:13 – 27:4	401 – 403			
33:7 – 34:22	401 – 403; 602	27:5 – 14		27:15-28:9
44:5 – 45:17	401 – 403; 602	27:5 – 14		
46:1 – 48:16	401 – 403; 602; 801 – 802	27:5 – 14; 45:16 – 22; 48:17 – 49:2		27:15-28:9
49:12 – 50:3	401 – 403			
50:10 – 52:15	401 – 403; 602; 801 – 802	27:5 – 14; 45:16 – 22		
52:18 – 53:7	401 – 403			
56:6 – 57:13	401 – 403; 602	27:5 – 14		27:15-28:9
62:11 – 62:17	401 – 403	27:5 – 14		27:15-28:9

[37] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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63:12 – 65:3	401 – 403; 602	27:5 – 14		27:15-28:9
67:14 – 70:1	401 – 403; 602	27:5 – 14		27:15-28:9
70:11 – 70:12				
71:5 – 71:14	401 – 403			
72:12 – 72:20	602; 801 – 802			
74:20 – 75:6	401 – 403; 602	27:5 – 14		27:15-28:9
86:20 – 87:6	401 – 403; 602; 801 – 802	27:5 – 14		27:15-28:9
90:15 – 91:7	401 – 403	91:18 – 21		
93:16 – 94:1	401 – 403			
94:8 – 95:3	401 – 403			
96:5 – 97:7	401 – 403			

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Deposition of Steven Minzer[38]
June 6, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
4:22 – 5:7				
5:19 – 7:11				
39:7 – 40:2		38:3 – 39:6	403	
75:3 – 79:23				
80:8 – 80:16				
80:20 – 84:10				
84:15 – 89:13				
89:17 – 102:20				
102:23 – 103:10				
103:15 – 104:13				
104:20 – 108:18				
108:20 – 115:4	701 re: 111:2 – 11	115:5 – 7		
115:6 – 117:23				
118:15 – 118:17				
118:20 – 118:21				
118:23 – 119:16				
119:21 – 120:18				
120:20 – 120:22				
120:25 – 126:12				
133:11 – 133:14				
133:17 – 134:16				

[38] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of Gary Muntz[39]
April 4, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
11:6 – 12:2	401 – 403			
12:20 – 13:22	401 – 403 re: 12:20 – 13:14			
16:1 – 16:15				
17:12 – 17:21				
19:8 – 20:2	401 – 403	19:4 – 7		
31:12 – 37:22	401 – 403, 801 – 802 re: 31:12 – 37:5			
38:11 – 39:9				
39:21 – 41:21				
42:1 – 44:13	801 – 802 re: 42:8 – 43:14			
45:4 – 55:20				
55:22 – 57:12				
57:21 – 59:12				
60:20 – 61:15				
61:17 – 62:7				
63:20 – 65:10				
67:11 – 69:17		69:18 – 70:9		
70:10 – 73:2				
76:2 – 77:6		82:6 – 18		
77:16 – 79:13		82:6 – 18		

[39] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
79:21 – 80:7				
81:17 – 82:5				
82:20 – 83:11				
85:17 – 87:12				
88:2 – 88:19				
89:21 – 90:14	401 – 403	88:20 – 89:19		
94:19 – 95:10	401 – 403			
97:1 – 125:22	401 – 403 re: 125:12 – 22			
127:9 – 128:14				
130:2 – 181:7	401 – 403 re: 131:12 – 20 401 – 403 re: 138:18 – 139:7			
186:2 – 188:22	401 – 403, 801 – 802			

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Deposition of Gary Muntz[40]
April 5, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
201:8 – 203:2		129:2 – 130:1; 195:10 – 197:1; 198:3 – 199:13; 256:15 – 257:18		206:12 - 15; 206:19 - 207:2; 212:3 - 6
203:12 – 204:11				
204:15 – 205:20				
207:10 – 207:20				
209:18 – 210:2	401 – 403			
211:4 – 211:22				
212:7 – 216:4	401 – 403 re: 214:12 – 215:1			
217:9 – 218:9				
218:16 – 221:4				
223:4 – 225:19				
226:21 – 227:16	401 – 403			
228:2 – 228:18				
230:2 – 231:1	401 – 403	228:19 – 230:1		
231:5 – 232:21	401 – 403			
235:1 – 237:18	401 – 403, 801 – 802	237:19 – 238:21		
238:22 – 240:3	401 – 403, 801 – 802			
241:4 – 241:17	401 – 403, 801 – 802			
242:4 – 243:15	401 – 403, 801 – 802	243:16 – 22		244:1 - 5; 245:4 - 9
246:13 – 247:21	401 – 403, 801 – 802			

[40] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
248:6 – 249:2				
251:10 – 252:13				
253:20 – 254:11		254:12 – 255:1		
255:2 – 256:14				
271:4 – 272:22				
274:5 – 276:6	401 – 403			
276:19 – 277:20		280:12 – 281:1		
283:11 – 284:4				
287:3 – 289:18	401 – 403			
306:7 – 308:2				
308:18 – 309:11				
339:17 – 344:21				
345:1 – 345:5				
345:12 – 346:17				
348:4 – 349:1				
352:18 – 353:13	401 – 403			

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Deposition of Gary Muntz[41]
May 10, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
363:21 – 364:12	401 – 403; 801 – 802			
365:6 – 365:18	401 – 403; 801 – 802			
368:22 – 369:4	401 – 403; 801 – 802	369:5 – 12		
369:13 – 370:16	401 – 403; 801 – 802			
377:4 – 378:22	401 – 403; 801 – 802			
406:10 – 437:8				
437:15 – 437:21				
438:16 – 456:22				
457:11 – 467:3				
467:8 – 469:8				
469:10 – 469:14				
469:18 – 477:6	602; 801 – 802 re: 473:14 – 477:6			
478:15 – 486:13				
486:19 – 500:16	401 – 403 re: 487:12 – 500:9			
500:19 – 501:16	401 – 403			
502:21 – 507:5	401 – 403			
507:14 – 519:4	401 – 403, 801 – 802			
519:10 – 521:2	401 – 403, 801 – 802			
522:6 – 527:19	401 – 403, 801 – 802 re: 522:6 – 15			

[41] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
	401 – 403 re: 525:7 – 527:19			
530:4 – 539:17				
540:7 – 540:10	401 – 403			
540:12 – 544:5	401 – 403			

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Deposition of Ben Pressey[42]
May 5, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
6:20 – 7:22				
8:4 – 17:18 17:22–18:2 18:7–25:6 Withdrawn: 17:19–21 18:3–6	Withdrawn 401 – 403 801 – 802	17:19 – 21; 18:3 – 6 11:20 – 12:16; 17:1 – 4 13:3 – 16:22 18:13 – 21:18		
25:10 – 26:8 26:13–42:22 Withdrawn: 26:9–12	Withdrawn 401 – 403	26:9 – 12 26:19 – 28:12; 39:19 – 40:6		
43:11 – 50:15		47:3 – 48:2; 49:5 – 8; 50:1 – 15		
50:21 – 53:22		51:8 – 52:18		

[42] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
Withdrawn 54:6–20 Not withdrawn: 54:21–56:5	Withdrawn 401 – 403	54:6 – 20		
56:18 – 84:22 Withdrawn: 85:1–99:16	Withdrawn 401 – 403 801 – 802	85:1 – 99:16 56:18 – 57:20; 58:20 – 60:11; 60:21 – 61:15; 61:16 – 62:16; 63:11 – 63:21; 64:9 – 17; 65:20 – 68:11; 76:1 – 5; 76:20 – 77:15; 78:17 – 80:3; 80:7 – 19 ;82:4 – 83:1; 83:17 – 19; 84:2 – 13; 84:19 – 22 62:17 – 63:10 57:21 – 58:14		
Withdrawn 100:2 – 103:6	Withdrawn			
Withdrawn 104:5 – 11 Not withdrawn: 104:12–115:7	Withdrawn 401 – 403	104:5 – 11 107:5 – 108:4; 108:18 – 111:18; 112:2 – 113:4; 113:15 – 114:12		

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
		108:7 – 114:12		
115:15 – 129:21	602	116:1 – 13; 118:15 – 120:3; 121:17 – 112:19; 123:8 – 22; 127:2 – 129:13 129:14 – 21		
130:11 – 133:18				
135:10 – 139:21 Withdrawn 139:22–140:2	Withdrawn 602	139:22 – 140:2 135:10 – 137:5 135:10 – 137:5		
140:6 – 154:13	602 401 – 403	142:7 – 20; 143:10 – 144:16; 153:7 – 14 144:17 – 146:3		

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Deposition of Stanley Rosen[43]
April 26, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
4:16 – 4:24				
8:18 – 11:19		8:6 – 17		
12:18 – 12:21				
15:24 – 16:8				
16:24 – 17:6				
17:16 – 17:23		17:24 – 18:2		
34:8 – 34:19		8:6 – 17; 34:20 – 23; 49:16 – 50:2		
35:8 – 35:11		8:6 – 17; 36:16 – 21		
38:12 – 38:15		38:16 – 39:24		
40:20 – 40:24		49:16 – 50:2		
49:4 – 49:10		48:17 – 49:3; 49:11 – 50:2		
53:8 – 53:12		53:4 – 7; 53:13 – 24		
64:15 – 65:4		65:5 – 11; 66:6 – 12		
87:11 – 87:19		8:6 – 17; 88:9 – 15		
95:17 – 96:2				
111:16 – 113:20				
177:13 – 178:12		8:6 – 17; 178:13 – 179:20		

[43] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of William Rubin[44]
June 2, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
8:22 - 15:16
18:1 - 18:20
20:12 - 22:15
24:24 - 26:13
44:13 - 45:14
52:6 - 53:19
58:19 - 61:15
147:10 - 152:23

[44] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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Deposition of Brian Rushka[45]
April 7, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
5:10 – 5:13				
8:11 – 8:19	401 – 403			
10:11 – 11:6				
12:9 – 13:3	401 – 403			
16:7 – 16:12				
25:20 – 26:2				
29:21 – 30:10	401 – 403	30:11 – 16		
30:17 – 33:6		30:11 – 16		
37:14 – 38:9		35:19 – 37:13		
44:2 – 44:14	401 – 403			
50:7 – 50:20	801 – 802			
51:8 – 52:9	801 – 802			
61:18 – 63:13		63:14 – 64:11		
68:7 – 72:18				
73:2 – 73:9				
77:9 – 78:12		76:7 – 77:8		
79:20 – 80:16		79:2 – 19; 80:17 – 81:4		
84:2 – 84:14				
85:7 – 87:7				
88:8 – 90:4		90:5 – 6		
91:18 – 93:14				
94:17 – 100:17	401 – 403; 801 – 802	100:18 – 21		

[45] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
100:22 – 101:1				
101:15 – 102:1				
105:15 – 110:2				
110:9 – 111:21				
112:6 – 115:16				
116:6 – 119:9				
120:2 – 121:3		121:4 – 122:5		122:6 - 123:6
128:2 – 128:12	801 – 802			
134:17 – 135:12				
142:22 – 144:4		140:18 – 142:3; 144:5 – 145:10		
145:19 – 146:5		146:6 – 147:5; 147:22 – 149:3		
147:6 – 147:20		146:6 – 147:5; 147:22 – 149:3		
152:10 – 153:16		146:6 – 147:5; 147:22 – 149:3; 151:19 – 152:9		
154:15 – 155:11	401 – 403			
158:6 – 159:1				
161:8 – 161:13				
164:11 – 164:19		162:10 – 164:10		
165:19 – 166:2		165:5 – 18		
167:9 – 168:22	401 – 403			
172:3 – 172:20	401 – 403	172:21 – 173:9		
173:12 – 175:13	401 – 403	172:21 – 173:9		
175:21 – 176:7	401 – 403	176:8 – 16		
179:15 – 182:5	401 – 403	177:14 – 179:14; 182:12 – 17		
182:12 – 183:7	401 – 403	182:12 – 17		

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
183:20 – 185:16	401 – 403	182:12 – 17		
187:1 – 190:8	401 – 403			
191:6 – 193:8		193:9 – 20		
194:9 – 194:20	401 – 403			
201:6 – 203:10	401 – 403	199:6 – 201:5203:11 – 204:12		
205:9 – 206:21		206:22 – 209:2		
211:16 – 212:10				
215:22 – 216:4		216:5 – 19		
217:11 – 219:3				
225:3 – 226:15		223:21 – 225:2		
227:11 – 228:14		228:15 – 22		

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Deposition of Brian Rushka[46]
April 8, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
239:4 – 241:5				
242:18 – 244:1	401 – 403			
244:19 – 250:22	401 – 403			
252:9 – 254:17	401 – 403			
255:9 – 256:11	401 – 403			
256:20 – 257:12	401 – 403			
259:8 – 260:17	401 – 403	260:18 – 21		
268:2 – 269:22				
271:21 – 272:14		271:6 – 20		
273:11 – 274:16	401 – 403	274:17 – 275:19		
282:17 – 283:8		281:13 – 282:16		
283:15 – 285:1		281:13 – 282:16		
285:6 – 286:4	401 – 403			
286:9 – 288:11	401 – 403			
291:20 – 292:5	401 – 403			
293:13 – 294:1				
294:9 – 294:22				
295:8 – 297:1				
299:18 – 300:1	401 – 403			
300:11 – 301:4	401 – 403			
302:16 – 303:20	401 – 403			
304:12 – 309:9	401 – 403			

[46] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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310:14 – 316:2	401 – 403			
317:9 – 319:1	401 – 403			
319:6 – 319:19	401 – 403			
320:8 – 335:11	401 – 403			
337:17 – 339:11	401 – 403			
350:16 – 351:5		351:15 – 352:7		
352:8 – 353:11	401 – 403	351:15 – 352:7		
353:14 – 353:19	401 – 403			
362:15 – 363:2				
363:22 – 364:4				
378:10 – 378:19	401 – 403; 801 – 802	378:20 – 379:10		
380:21 – 381:9		378:20 – 379:10		
385:20 – 386:14		378:20 – 379:10		
395:1 – 402:1	401 – 403			
402:20 – 408:1	401 – 403			
409:2 – 410:13	401 – 403			
412:9 – 419:22	401 – 403			
420:21 – 421:15	401 – 403			
425:11 – 428:15	401 – 403			
429:1 – 429:16	401 – 403			
429:22 – 435:18	401 – 403			
437:12 – 443:3		147:22 – 149:3		
445:18 – 446:20		446:21 – 447:16		
447:17 – 448:6		446:21 – 447:16		
450:21 – 458:20		449:19 – 450:20		

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Deposition of Bruce Schneider[47]
May 23, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
7:9 – 7:14				
7:22 – 12:15	401 – 403 re: 7:22 – 8:12 602 re: 11:15 – 12:15			
14:20 – 23:17	401 – 403 re: 14:20 – 16:18 401 – 403; 602; 801 – 802 re: 16:19 – 23:17			
28:15 – 37:21	401 – 403; 602; 801 – 802			
38:21 – 41:4	401 – 403; 602			
42:22 – 43:4	401 – 403; 602			
49:3 – 49:21	401 – 403			
50:9 – 64:20	401 – 403; 801 – 802 re: 50:9 – 55:5 401 – 403; 602; 801 – 802 re: 55:6 – 59:16 602 re: 81:1 – 83:5			

[47] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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68:21 – 71:12	401 – 403; 602; 801 – 802			
73:3 – 74:21	401 – 403; 801 – 802			
75:8 – 85:6	401 – 403; 602; 801 – 802 re: 75:8 – 80:22 602 re: 81:1 – 83:5 401 – 403; 602; 801 – 802 re: 83:6 – 85:6			
87:6 – 87:12	401 – 403; 602			
89:21 – 96:21	401 – 403; 602; 801 – 802			
98:18 – 100:15	401 – 403; 602; 801 – 802			
103:18 – 107:2	401 – 403; 602; 801 – 802			
118:7 – 125:2	401 – 403; 602; 801 – 802			
125:11 – 138:16	401 – 403; 602; 801 – 802			
148:2 – 158:14	401 – 403; 602; 801 – 802			
159:2 – 160:21	401 – 403; 602; 801 – 802			
161:19 – 167:1	401 – 403; 602; 801 – 802			
168:12 – 174:1	401 – 403; 602; 801 – 802			

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Deposition of David Sincoskie[48]
May 18, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
7:16 - 9:13
23:4 - 26:20
31:17 - 33:4
37:6 - 37:22
39:13 - 40:20
41:22 - 42:10
43:11 - 44:8
46:3 - 47:11
53:1 - 56:12
57:14 - 58:14
59:22 - 60:18
68:15 - 70:8
73:9 - 75:17
76:4 - 80:22
81:15 - 82:10
84:6 - 84:22
93:4 - 97:22
98:9 - 105:14
175:6 - 188:5

[48] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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Deposition of David Sincoskie[49]
May 19, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS
299:11 - 301:5
308:11 - 309:4
310:9 - 311:2
322:15 - 326:6
327:15 - 329:7
338:12 - 339:21
341:5 - 342:8
387:13 - 390:4
392:2 - 392:14
419:21 - 420:9
421:7 - 424:18
535:21 - 537:7
546:4 - 546:17
551:11 - 553:19

[49] Pursuant to the parties' agreement, Telcordia's designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

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Deposition of Leonard Suchyta[50]
June 13, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
7:24 – 18:2				
18:25 – 20:19				
21:5 – 25:7				
27:16 – 27:17				
28:10 – 28:24				
30:9 – 30:15				
31:22 – 32:23				
33:13 – 33:20	401 – 403			
222:9 – 229:24				
230:9 – 231:18		245:13 – 246:10; 250:8 – 251:21; 253:16 – 25	402, 403, 602, 701 - 702, 802	
232:3 – 234:13				
234:20 – 237:16				
238:8 – 241:22		245:13 – 246:10; 250:8 – 251:21; 253:16 – 25	402, 403, 602, 701 - 702, 802	
242:15 – 242:20				
254:11 – 254:17				
256:19 – 257:7				
287:11 – 289:2				
291:17 – 292:24				
294:23 – 295:19				
295:25 – 296:25				

[50] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of Michael Takefman[51]
May 15, 2006

TELCORDIA'S COUNTER DESIGNATIONS
39:4 - 40:22
50:9 - 10
50:13 - 51:8
51:10 - 22
52:2 - 18
175:15 - 19
176:6 - 8
176:11 - 12
176:20 - 178:20
179:11 - 20
179:22 - 180:18
180:22 - 182:14
182:19 - 183:3
183:7 - 17
183:20 - 184:3
184:13 - 14
184:16 - 17
184:19 - 20
185:3 - 13
185:15 - 17
185:20 - 22
186:6 - 10
186:18 - 22

[51] The parties have not yet had an opportunity to exchange counter and reply designations or objections for these designations, but will work together to do so.

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187:6 - 7
187:11 - 14
187:19 - 22
188:4 - 190:20

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Deposition of Jeffrey Towne[52]
March 29, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
4:9 – 6:2	401 – 403			
8:4 – 8:20				
10:15 – 10:17				
15:11 – 16:17				
25:1 – 29:8	602 re: 27:18 – 21 401 – 403 re: 28:19 – 29:9			
29:17 – 32:3				
34:1 – 35:3	602			
39:1 – 43:16	602			
44:19 – 46:17	401 – 403 re: 45:15 – 46:17			
47:12 – 48:20				
49:4 – 50:5				
50:15 – 51:13				
51:17 – 56:20	401 – 403 re: 54:10 – 13			
61:15 – 63:13	602; 401 – 403	61:6 – 14		
64:16 – 64:21				
68:15 – 73:15	602 re: 69:19 – 73:15			
74:4 – 81:9	602 re: 75:3 – 75:9			
81:17 – 84:7				

[52] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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84:11 – 90:11		84:11 – 86:2; 88:15 – 90:11		
90:18 – 92:2	602	92:9 – 13		
92:14 – 94:9				
94:16 – 100:9	602; re: 95:7 – 96:16; 97:17 – 100:9			
101:18 – 106:18	602 re: 101:18 – 104:4; 105:7 – 16			
126:20 – 127:14	602; 401 – 403	125:1 – 18; 127:15 – 128:6; 128:14 – 129:2	402, 403, 602 re: 125:1-18; 403 re: 127:15 - 128:6; 128:14-129:2	
128:7 – 128:10	602			
130:7 – 131:10	602; 401 – 403			
131:16 – 141:5	602; 401 – 403 re: 131:16 – 141:5	128:14 – 129:2	403	
143:7 – 151:10	602; 401 – 403 re: 143:7 – 151:10	128:14 – 129:2	403	
152:5 – 152:21	602; 401 – 403	128:14 – 129:2	403	
153:16 – 154:20	602; 401 – 403	128:14 – 129:2; 153:3 – 15	403 re: 128:14 - 129:2	
155:2 – 166:12	602; 401 – 403 re: 155:2 – 166:12	128:14 – 129:2	403	
167:11 – 168:22	602; 401 – 403	128:14 – 129:2	403	
169:3 – 178:1	602; 401 – 403 re: 163:3 – 178:1	128:14 – 129:2	403	
179:14 – 182:2		182:3 – 8		

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Deposition of Jeffrey Towne[53]
May 25, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
188:12 – 189:14	401 – 403			
Withdrawn 191:5 – 192:4	401 – 403			
193:18 – 196:19	602; 401 – 403 re: 193:18 – 196:19	128:14 – 129:2	403	
197:4 – 199:19				
200:5 – 201:14	401 – 403			
201:22 – 202:15	401 – 403; 602			
204:3 – 204:9	401 – 403; 602			
206:1 – 208:10				
208:22 – 212:22	602 re: 210:4 – 212:22			
213:11 – 217:20	602			
218:11 – 221:1	602			
221:10 – 222:19				
223:2 – 226:22				
227:6 – 233:8	401 – 403; 602			
233:11 – 238:12	401 – 403 re: 233:11 – 235:22; 237:13 – 238:12			
239:2 – 240:6	401 – 403			
240:12 – 243:3	602 re: 240:12 – 241:3			

[53] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
	401 – 403 re: 241:4 – 243:3			
244:7 – 246:11	401 – 403			
248:21 – 249:8	602			
249:15 – 249:19				
249:22 – 250:7				
250:22 – 256:3	401 – 403; 602	128:14 – 129:2; 250:17 – 21	403 re: 128:14-129:2	
256:17 – 265:20	602; 401 – 403 re: 256:17 – 258:11 401 – 403 re: 258:12 – 265:20	128:14 – 129:2	403	
266:8 – 274:17	401 – 403 re: 266:8 – 270:18; 271:13 – 274:17 602 re: 270:19 – 271:12			
275:7 – 275:14	401 – 403; 602			
276:3 – 276:14				
276:17 – 281:12	401 – 403; 602 re: 278:1 – 281:12			
281:18 – 282:6	401 – 403			
282:10 – 285:21	401 – 403 re: 282:10 – 284:14; 285:7 – 21			
286:4 – 287:11	401 – 403			
287:17 – 287:22	401 – 403			

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
288:10 – 308:18	401 – 403 re: 288:10 – 296:4; 303:22 – 307:1 602 re: 302:2 – 22	128:14 – 129:2	403 re: 128:14 - 129:2	
309:1 – 310:20				
312:17 – 313:17	602			
318:2 – 319:7	401 – 403			
Withdrawn 319:8–22	401 – 403			

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Deposition of Liang Wu[54]
April 20, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
19:10 – 21:25				
35:12 – 41:19		41:20 – 42:25		
54:17 – 60:5		60:6 – 62:24	602	62:25-63:24
69:15 – 71:14		71:15 – 20	602	
72:11 – 76:9				
76:22 – 77:7		77:8 – 78:18		129:20-131:3
79:25 – 80:18				
81:11 – 82:14				
114:22 – 115:8		115:9 – 116:3		

[54] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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Deposition of Liang Wu[55]
April 21, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
11:17 – 12:2				
13:12 – 15:18				
17:20 – 17:23		17:24 – 18:21		18:22-19:3; 25:15-25
19:7 – 20:21				
23:3 – 24:14		24:15 – 25:8		
27:2 – 27:4	401-403	27:5 – 7		
46:16 – 47:4		61:15 – 18		60:19-61:8, 61:19-24 {4/21/06}; 144:5-10, 146:15-149:22 {4/20/06}
51:14 – 51:25				
60:19 – 61:24				
63:21 – 64:2				
64:10 – 64:13				
68:22 – 69:8		69:9 – 14		
69:15 – 69:18		69:19 – 70:9		
79:11 – 82:9				
91:12 – 92:14				
96:2 – 96:11				
97:8 – 98:7				
98:19 – 101:5				
101:11 – 101:12				
109:4 – 109:10				

[55] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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111:4 – 111:18				
114:12 – 117:10				
117:18 – 118:3				
122:7 – 123:5		123:6 – 124:10		
124:11 – 124:23				
126:21 – 127:5				
130:18 – 131:22				
133:18 – 134:5				
134:18 – 135:5		135:6 – 25		
145:12 – 146:4				
148:6 – 148:11				
150:7 – 151:14				
159:2 – 159:17				
170:5 – 174:23				
176:25 – 177:9				
178:8 – 179:17		179:10 – 20		178:8-17
179:24 – 180:8		180:9 – 181:3		
230:2 – 230:9		61:15 – 18		60:19-61:8, 61:19-24 {4/21/06}; 144:5-10, 146:15-149:22 {4/20/06}
230:20 – 231:5		61:15 – 18		60:19-61:8, 61:19-24 {4/21/06}; 144:5-10, 146:15-149:22 {4/20/06}
253:4 – 253:18				
255:18 – 255:24				
256:9 – 256:13				
256:23 – 257:8				
273:14 – 274:3		274:4 – 7	402, 403	262:12-17; 271:14-272:6
316:7 – 318:12				
319:2 – 324:23	701 re: 320:24 – 321:3 701 re: 323:23 – 324:9			
326:14 – 327:12		327:13 – 18	602	

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327:19 – 330:16	801 – 802 re: 329:18 – 23			

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Deposition of Tim Zhou[56]
February 22, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
		Lucent objects to Telcordia's indiscriminate designation of the depositions of Tim Zhou, including large portions of irrelevant material. Lucent reserves the right to use as a counter designation any portion of this deposition designated by Telcordia	Telcordia reserves the right to object and offer reply designations to any counter designation that my be offered by Lucent.	
5:11 – 6:13	401 – 403			
8:13 – 15:3				
15:7 – 15:11	401 – 403			
27:16 – 31:3				
43:24 – 78:7	602 re: 43:24 – 47:5; 49:15 – 18; 51:13 – 19; 51:23 – 52:4; 52:16 – 53:19; 59:7 – 21; 60:3 – 24; 69:19 – 25; 72:1 – 9 401 – 403 re: 76:8 –			

[56] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
	77:12			
78:15 – 135:18 138:16–145:23 148:25–151:15 Withdrawn: 135:19–138:15 146:24–148:24	Withdrawn: 135:19 – 138:15; 146:24 – 148:24 602 re: 85:3 – 10; 99:1 – 8; 101:7 – 23; 103:25 – 107:2; 122:6 – 123:14 ; 123:25 – 124:4; 130:10 – 131:4 ;131:24 – 132:3; 144:10 – 13; 144:17 – 146:10 401 – 403 re: 79:21 – 83:23; 85:11 – 21; 86:11 – 24; 88:23 – 89:1; 97:8 – 99:8; 118:9 – 122:5; 150:6 – 151:14 701 re: 90:23 – 91:8; 113:3 – 22; 114:17 – 115:9; 133:17 – 134:2; 140:14 – 142:17 801 – 802 re: 114:3 – 16; 117:16 – 118:8; 146:11 – 23			
152:12 – 160:16	401 – 403 re: 152:13 – 17; 154:24 – 156:13; 157:22 – 158:4			

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TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
	602 re: 152:18 – 23; 153:3 – 154:5; 154:24 – 155:6; 156:14 – 157:3 701 re: 156:14 – 157:3; 158:22 – 160:12 801 re: 157:16 – 21			
160:21 – 167:17	602 re: 163:20 – 164:19; 167:12 – 17			
169:11 – 170:1	602			

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Deposition of Tim Zhou[57]
February 26, 2006

TELCORDIA'S DEPOSITION DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' COUNTER DESIGNATIONS	TELCORDIA'S OBJECTIONS TO COUNTERDESIGNATIONS	TELCORDIA'S REPLY DESIGNATIONS
188:12 – 189:12	401 – 403			
300:19 – 326:13	611 (a) re: 301:3 – 305:16; 307:8 – 10; 308:6 – 22; 312:11 – 19; 115:13 – 316:3; 317:8 – 318:1; 319:8 – 17; 319:20 – 320:9; 320:16 – 20 602 re: 301:3 – 305:16; 312:11 – 19; 319:20 – 320:9; 320:16 – 20; 321:10 – 12; 322:4 – 9 401 – 403 re: 322:20 – 323:19; 325:15 – 326:13 701 re: 324:1 – 325:6 801 re: 115:13 – 17; 116:13 – 18			

[57] See Telcordia's objections and counter-designations to defendants' initial designations, since defendants have cited some of the same lines as both original and counter-designations.

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EXHIBIT F2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. LUCENT TECHNOLOGIES, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04 – 875 – GMS
TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. CISCO SYSTEMS, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04 – 876 – GMS

EXHIBIT F2: DEFENDANTS' DEPOSITION DESIGNATIONS

The following is Defendants Cisco and Lucent's deposition designations, Telcordia's objections and counter-designations to Defendant's designations, and Defendant's objections and reply designations to Telcordia's counter-designations.

I. Defendants' Deposition Designations

Defendants reserve the right to submit additions and/or revisions to their designations after meeting and conferring with Telcordia on outstanding trial management issues and after receiving the Court's rulings on the parties' respective motions *in limine*. In an effort to streamline this submission, Defendants have not designated deposition testimony for theories that Defendants are not pursuing at trial in view of Telcordia's concession of non – infringement of the '306 patent. However, insofar as Telcordia revives or otherwise pursues its allegations of infringement at some later date, Defendants reserve the right the identify any and all appropriate

witnesses, exhibits and deposition testimony and to otherwise amend, supplement or revise any and all portions of the pretrial order as appropriate. Finally, Defendants will edit out any objections or attorney colloquy from the testimony they use at trial consistent with the Court's standing order.

II. Telcordia's Objections and Counter-designations to Defendant's Designations

Although not specifically stated herein, Telcordia's objections include all objections under Rule 611 and any other objections included in the deposition record. Telcordia objects to the defendants' use of deposition testimony for any witness who lives or works within 100 miles of the Courthouse pursuant to Fed. R. Civ. P. 32(a)(3). Telcordia reserves the right to use any and all of its original deposition designations as counter designations to the defendants' original designations.

III. Defendant's Objections and Reply Designations to Telcordia's Counter-designations

Although not specifically stated herein, Defendants' objections to Telcordia's counter-designations include all objections under Rule 611 and any other objections included in the deposition record. Defendants reserve the right to use any testimony designated by Defendants as a reply designation to any of Telcordia's counter-designations. Defendants further note that they have not objected to attorney objections and colloquy in Telcordia's counter-designations based on the understanding that such designations are improper and will be removed prior to the trial.

Deposition of Pierre Adam
April 7, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
6:21 – 7:10				
8:23 – 9:15				
9:19 – 10:6	402, 403, 701-702, 1002			
11:20 – 23				
12:6 – 13:22	602, 802, 1002			
15:7 – 16:2				
16:23 – 17:12	602, 701-702			
17:14 – 18				
17:21 – 18:13	602, 701-702, 1002			
18:16 – 19:8	402, 403			
19:9 – 21:8	402, 403, 701-702, 1002			
21:24 – 22:2	402, 403, 1002			
22:10 – 21	402, 403, 1002			
22:25 – 23:14	402, 403, 602, 701-702, 802, 1002			
23:18 – 24:9	402, 403, 602, 701-702, 802, 1002			
24:16 – 25:23	402, 403, 701-702, 1002			
25:24 – 29:18	402, 403, 602, 701-702, 802, 1002			
30:20 – 25	402, 403, 701-702	31:24 - 32:4; 32:23 - 25		31:14-15; 32:12-17
33:6 – 8				
34:4 – 24	602			
35:9 – 17	602			
36:10 – 14	602			
36:22 – 25				
37:2 – 11				
37:14 – 38:2	1002			
39:2 – 19	1002			
40:5 – 16	402, 403			
40:17				

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
40:20				
40:23 – 41:22	402, 403			
42:17 – 43:10	402, 403, 602, 1002			
43:13 – 44:3	402, 403, 701-702,1002			
44:6 – 7	402, 403, 701-702,1002			
44:15 – 18	602, 701-702, 802			
44:22 – 45:7	602, 701-702, 802			
45:10				
45:12 – 21	602, 701-702, 802			
45:24				
46:2 – 11	402, 403, 602, 701-702, 802			
48:23 – 49:6	402, 403, 602, 701-702, 802	49:18 - 50:6	401-403	
71:22 – 72:15	402, 403, 602, 701-702, 802			
77:12 – 78:23	402, 403, 602, 701-702, 802	49:18 - 50:6	401-403; outside scope	
82:5 – 15	402, 403, 602, 701-702, 802			
83:6 – 23	402, 403, 602, 701-702, 802	49:18 - 50:6	401-403; outside scope	
92:8 – 93:10	402, 403, 602, 701-702, 802			
96:4 – 12	402, 403, 602, 701-702, 802	49:18 - 50:6	401-403; outside scope	
104:10 – 17	402, 403, 602, 701-702, 802			
109:18 – 110:4	402, 403, 602, 701-702, 802	49:18 - 50:6	401-403; outside scope	
131:5 – 9	402, 403, 602, 701-702, 802			
131:15 – 132:2	402, 403, 602, 701-702, 802	49:18 - 50:6	401-403; outside scope	

Deposition of Vernon Anthony
May 16, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
	Global Objection under FRCP 32(a)			
63:25 – 64:11	402, 403; 602 re 64:8-11			
85:8 – 19	402, 403			
87:8 – 88:15				
88:23 – 89:22				
92:3 – 8	402, 403	91:7 - 92:2; 92:9 - 93:1	401-403	
93:2 – 94:20	402, 403			
95:16 – 96:24	402, 403			
98:12 – 100:10	402, 403; 602; 802	97:9 - 25	602	
113:5 – 15	402, 403; 602; 701	113:16 - 114:6	401-403; 602	
114:7 – 115:5	602; 701	113:16 - 114:6	401-403; 602	
122:6 – 123:10	402, 403	123:11 - 124:10		124:11-16; 125:1-18
161:21 – 25	402, 403; 802			
205:23 – 206:12	402, 403			
208:9 – 22	402, 403	208:23 - 209:19	602	
210:22 – 211:5	402, 403			
223:11 – 18	402, 403; 602; 701	221:19 - 222:14		222:24-223:10
225:14 – 19	602; 701	228:25 - 229:5		
233:7 – 234:19		232:20 - 233:6	401-403	
235:5 – 14	402, 403; 602	234:25 - 235:4		
235:23 – 236:10	402, 403; 602	234:25 - 235:4		
251:15 – 18	402, 403			
252:16 – 253:18	402, 403			
254:15 – 255:10	402, 403; 404; 602; 608; 701; 802			
257:9 – 16	402, 403	256:14 - 257:8		255:21 – 256:13
258:25 – 260:9	402, 403; 404; 602; 608; 701; 802	260:12 - 261:3		261:4-13
262:5 – 265:25	402, 403; 404;			

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
	602; 608; 701; 802			
266:21 – 267:16	402, 403; 404; 602; 608; 701; 802	267:17 - 25		268:1-19
340:7 – 15	408			
355:11 – 357:12	402, 403	94:16 - 20		
358:9 – 18	402, 403			
359:7 – 15	402, 403			
359:22 – 360:19	402, 403	359:16 - 25	401-403	
364:13 – 24	402, 403; 404; 602; 608; 701; 802	260:12 - 261:3		261:4-13
365:7 – 17	402, 403; 404; 602; 608; 701; 802	260:12 - 261:3		261:4-13
366:1 – 367:23	402, 403; 404; 602; 608; 701; 802	260:12 - 261:3		261:4-13
378:14 – 382:3	402, 403			
385:22 – 386:19	402, 403; 701			
386:22 – 388:17	402, 403			
390:15 – 392:7	402, 403; 404; 602; 608; 701; 802			
395:9 – 20	402, 403			
396:1 – 10	402, 403			
409:11 – 20	402, 403	409:21 - 410:7		
413:4 – 22	402, 403	413:23 - 414:9		
414:10 – 21	402, 403	413:23 - 414:9		

Deposition of Robert Barr[1]
May 27, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
8:1 – 9:3				
11:3 – 12:1				
20:12 – 21:8				
29:6 – 30:6				
30:16 – 31:7				
36:1 – 16				
38:16 – 40:13				
61:7 – 62:4				
71:19 – 72:9				
80:19 – 81:9				
82:18 – 83:7				
89:16 – 90:11				
93:7 – 94:16				
96:12 – 97:19				
106:2 – 14				
107:7 – 108:4				
112:6 – 115:9				
122:17 – 123:9				
128:2 – 14				
129:14 – 17				
138:10 – 139:12				
141:5 – 14				
153:13 – 154:8		154:9 - 14		156:1-11
154:15 – 155:9				
159:17 – 160:19				
163:16 – 164:1		164:2 - 13		
177:20 – 180:1				
181:22 – 182:22				
183:10 – 184:11				

[1] In addition to other testimony, Defendants' designations to Robert Barr's testimony are subject to receiving the Court's rulings on the parties' respective motions *in limine*.

Deposition of Mark Beckner
June 14, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
8:15 – 18				
24:15 – 25:6				
27:5 – 16				
34:3 – 35:4				
35:20 – 36:8				
50:6 – 11	602; 403; 802			
54:14 – 55:12	602			
65:5 – 16				
73:17 – 74:9				
80:18 – 81:4	602; 403			
82:17 – 83:12				
83:22 – 84:15	403			
86:17 – 87:9	602; 1002			
89:18 – 90:17	1002; 701-702			
91:17 – 92:3	403			
92:12 – 20	1002			
94:4 – 7	602	93:17-94:3		
96:3 – 19	403			
102:6 – 11				
104:11 – 12	403			
105:4 – 106:22	403	107:1-5		
109:17 – 110:14	403			
126:11 – 127:9	701-702	127:10-128-:4		128:5-129:9
129:4 – 130:17	701-702			
136:4 – 19				
137:8 – 15				
138:16 – 139:17	403			
142:18 – 144:11				
144:21 – 145:12				
145:17 – 146:20	701-702			
156:11 – 17				
157:6 – 159:19	602; 403			
162:4 – 163:6	602			
172:16 – 173:4	602			
173:6 – 174:6				
174:18 – 176:3	602; 403			
176:13 – 177:18	602; 403			
179:16 – 21	403; 1002			
184:15 – 185:17	701-702; 602	185:18-186:6		

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
186:7 – 15	701-702			
190:4 – 17	602; 701-702; 403			
191:11 – 193:6	1002; 602; 701-702			
203:2 – 204:21	701-702	205:1-206:9		206:10-21
218:3 – 22	701-702			
233:21 – 234:11	701-702; 403			
238:1 – 5				
241:1 – 11				
246:21 – 247:12				
253:15 – 254:19	701-702			
276:1 – 277:11	701-702			
279:5 – 280:4	602; 701-702			
281:21 – 283:5				
284:15 – 285:19	602			
291:8 – 292:19				
297:10 – 298:13	602	294:7-297:9		293:4-294:6
303:22 – 304:13				
306:11 – 307:10				
315:22 – 316:14				
317:14 – 319:9	602			
348:8 – 22		349:2-350:4		350:5-351:10
381:15 – 383:8				
385:4 – 386:13		386:14-387:8		387:9-17
387:9 – 17				
387:19 – 389:11				

Deposition of Yau – Chau Ching
June 9, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
28:7 – 29:10	402			
37:22 – 38:15				
39:1 – 7				
78:20 – 79:7				
88:3 – 9	403			
95:7 – 17				
114:5 – 10				
115:20 – 116:20	602; 402			
117:3 – 6				
118:1 – 21	402			
122:7 – 123:4		123:5-10		
168:9 – 15	402	168:17-169:2		169:3-10
201:4 – 16	402			
235:19 – 236:14	402			
240:18 – 241:4	602			
243:18 – 244:5				
245:21 – 246:16	402			
254:9 – 255:21	402			
290:8 – 17	403			

Deposition of Jean – Yves Cochennec
April 6, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
6:16 – 25				
8:16 – 19				
8:25 – 9:14		9:15 -11:23	401-403	
12:14 – 13:2		13:3 - 14:6	401-403; outside scope	14:7-23
14:7 – 10				
14:13 – 17	402, 403, 602, 701-702, 802			
14:20 – 22	402, 403, 602, 701-702, 802			
16:7 – 22				
17:16 – 18:4	602, 802			
18:14 – 19:6	602, 802	18:5 - 7		
19:9 – 25	602, 802			
20:20 – 22:5	602, 802			
22:13 – 22				
23:9 – 15	Leading, 602			
26:9 – 23	402	13:3 - 14:6	401-403; outside scope	14:7-23
30:10 – 31:10	402, 403, 602, 701-702, 802, 1002			
31:14 – 15	402, 403, 602, 701-702, 802, 1002			
35:8 – 14	Leading, 402, 403, 602, 701-702, 802	15:4 - 16:6	401-403	
35:18 – 36:12	402, 403, 602, 701-702, 802	15:4 - 16:6	401-403	
38:4 – 11				
66:24 – 67:3	402, 403, 602, 701-702			
67:12 – 68:18	402, 403, 602, 701-702			
71:3 – 21	402, 403, 602, 802			
81:3 – 5				
81:8 – 82:16	402, 403, 602,			

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
	701-702, 802, 1002			
92:22 – 24				
93:4 – 8				
93:10 – 14				
98:5 – 22	402, 403, 602, 701-702, 802	15:4 - 16:6	401-403	
102:2 – 13	402, 403, 602, 701-702, 802, 1002			

Deposition of Brian Day[2]
June 6, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
5:7 – 5:15				
14:9 – 14:11				
17:6 – 17:10				
19:3 – 19:15				
28:17 – 30:9				
30:14 – 31:12				
32:5 – 32:12				
50:19 – 51:5				
52:3 – 52:6				

[2] The parties have not yet had an opportunity to exchange counter and reply designations or objections for these designations, but will work together to do so.

Deposition of Rick Augusto dePinho
May 4, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
11:5 – 12:1				
12:9 – 20				
42:10 – 44:11				
46:22 – 47:6				
57:5 – 9				
60:13 – 61:6				
65:8 – 66:7	402, 403, 602, 701			
70:4 – 13				
70:17 – 22				
71:18 – 22		71:1 - 17		
95:4 – 11	402, 403, 602, 701			
96:1 – 17	402, 403, 602, 701			
105:3 – 106:8	402, 403			
106:15 – 109:6	402, 403			
109:12 – 109:22	402, 403			
112:6 – 113:1	402, 403			
113:6 – 15	402, 403			
114:7 – 115:4	402, 403			
127:1 – 12	602, 701			
131:7 – 132:5	602, 701	132:7 - 15		132:16-22
133:1 – 134:14	402, 403			
135:1 – 136:2	402, 403, 602, 701			
138:15 – 139:11		139:12 - 140:20		
141:10 – 142:2		142:3 - 5	401-403	
142:6 – 13	602, 701	142:14 - 143:8	401-403; 602	
144:11 – 18				
150:16 – 151:6	402, 403, 602, 701			
151:14 – 152:2	402, 403, 602, 701			
152:7 – 153:13	402, 403, 602, 701			
160:12 – 18				
161:1 – 14				

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
162:9 – 163:12	602, 701			
163:19 – 164:7				
164:11 – 165:12	602, 701	165:13 - 19		
165:20 – 166:14	602, 701			
167:21 – 168:3	602, 701			
180:21 – 181:12	403			
182:11 – 183:11	403, 602, 701			
191:13 – 192:15	402, 403, 602, 701			
194:21 – 197:3		193:5 - 194:20	401-403	
197:16 – 198:15		198:16 - 199:3		
199:18 – 200:3		200:4 - 13	non-responsive	
200:14 – 201:1		201:2 - 7; 201:19 - 202:1	602	201:8-17; 202:2-20
202:21 – 203:20	402, 403	203:21 - 204:7		202:17-20
204:8 – 17	402, 403			
204:20 – 205:11	402, 403			
206:7 – 207:5	402, 403			
209:4 – 210:10	402, 403, 602, 701			
217:19 – 218:9		218:10 - 219:10	non-responsive	
219:11 – 15		219:16 - 220:8	401-403; outside scope	220:17 – 221:1
233:8 – 20	402, 403			
283:10 – 286:2	403, 602, 701	286:3 - 6	non-responsive	
290:4 – 20		290:21 - 292:16	602; non-responsive	292:17-294:2
300:21 – 301:21		294:4 - 300:20	401-403	
315:2 – 17	402, 403			
315:20 – 316:3	402, 403			
316:6 – 17	602, 701			
317:21 – 319:6	402, 403, 602, 701	319:7 - 13		
319:20 – 320:20	403			
323:5 – 16	403			
326:19 – 327:6				
327:9 – 14		327:15 - 22	602; non-responsive	
334:6 – 336:8	602, 701	336:9 - 17	non-responsive	
336:18 – 337:21				
338:8 – 340:3	403, 602, 701			
340:13 – 342:6	403, 602, 701			

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
343:20 – 344:10	403			
349:20 – 351:7	403, 602, 701			
365:6 – 366:4		366:5 - 14	602	
368:2 – 22				
371:5 – 372:19	402, 403			
379:19 – 380:10				
385:7 – 16				

Deposition of Rick Augusto dePinho
May 5, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
28:1 – 18	602, 701			
101:1 – 8	402, 403			
105:7 – 106:14	402, 403, 602, 701			
124:16 – 125:11	402, 403, 602, 701			
157:22 – 158:16				
161:21 – 162:2				
224:21 – 227:2	402, 403, 602, 701	227:14 - 16		227:17-19
237:4 – 238:13				
239:5 – 240:9				
247:9 – 248:2				
296:12 – 20	602, 701	296:21 - 297:6	401-403; 602	
302:10 – 306:4	402, 403, 602, 701			
314:14 – 315:1	402, 403, 602, 701			
318:9 – 319:12	602, 701			
324:19 – 326:18	402, 403	327:1 - 329:15; outside scope	401-403	
342:18 – 343:2				
343:17 – 345:5	403	345:6 - 346:22	401-403; 602	
351:11 – 354:15	402, 403, 602, 701			
355:11 – 357:3				
363:1 – 365:14	602, 701			
366:8 – 22	602, 701	367:1 - 7	401-403; 602; non-responsive	
367:8 – 21	602, 701			
368:3 – 14	602, 701	368:15 - 369:1	401-403	
371:2 – 10	602, 701			

Deposition of Rick Augusto dePinho
May 18, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
422:2 – 10				
425:1 – 426:18				
439:11 – 440:4				
447:2 – 9	403			
449:7 – 450:6	403	451:4-16	401-403; 602	451:17 – 452:3
453:3 – 455:2				
458:5 – 459:4				
461:7 – 464:5				
465:10 – 470:10		470:11-471:19	401-403; 602	
472:2 – 473:6				
475:16 – 21				
477:12 – 481:14				
482:1 – 5				
482:13 – 483:19				
485:9 – 486:10		486:11-18	non-responsive	486:21 – 487:2; 487:11-14
488:13 – 491:4				
493:6 – 494:3				
494:6 – 10				
504:17 – 505:8				
505:19 – 506:4		509:16-510:6	appears to apply to 510:7-16; 602	509:11-15
510:7 – 16		513:17-514:9	appears to apply to 514:11 – 15; 401-403	
514:11 – 15		515:15-516:9; outside scope	non-responsive	
537:20 – 539:10	602, 701			
555:11 – 21	602, 701	555:22-556:9	non-responsive	556:21 – 557:5
592:16 – 595:6				
595:10 – 597:4				
597:7 – 598:2				
598:12 – 599:13				
601:9 – 12				
602:1 – 5				
602:21 – 603:19				
604:7 – 12				
604:15 – 605:17				

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
610:1 – 612:3				
615:15 – 616:16	403, 602, 701			
624:2 – 10				
686:5 – 21		687:1-689:8	non-responsive	556:21 – 557:5
695:17 – 696:9				
696:12 – 19		732:16-733:20	appears to apply to 733:21 – 735:14; non-responsive	
733:21 – 735:14		736:13-737:11; 741:12-742:8	appears to apply to 742:9 – 18; 401-403; 602	
742:9 – 18				
753:4 – 755:12	402, 403	755:20-757:12	non-responsive	
758:2 – 759:16	402, 403, 602, 701			
760:14 – 762:5	402, 403, 602, 701			

Deposition of Rick Augusto dePinho
May 22, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
23:3 – 25:20	402, 403			
38:24 – 39:15	402, 403			
40:18 – 41:2	402, 403	41:12-25; 43:24-44:4; 44:8-45:8	602; non-responsive	
46:8 – 24	402, 403	66:17-67:14		
67:15 – 68:11		68:12-70:4		71:3-16
109:21 – 110:15				
114:11 – 116:14	402, 403	116:15-118:6	non-responsive	118:7-18
123:4 – 124:3	402, 403			
134:2 – 23		134:24-135:12	602	
137:2 – 138:13	402, 403			
140:2 – 141:6				
171:4 – 25				
172:24 – 174:4				
175:8 – 23	602			
204:12 – 205:11	402, 403, 602			
228:19 – 229:8	602, 701	229:24-230:1; 232:4-7; 242:16-243:1	401-403 re 229:24-230:1; 232:4-7; non-responsive and outside scope re 242:16-243:1	
243:2 – 17	402, 403, 701	243:18-244:6	non-responsive	
244:7 – 22	402, 403, 701			
253:6 – 254:18	402, 403			
264:4 – 265:2	402, 403, 701	265:3-268:8	401-403; non-responsive; outside scope	
268:16 – 270:8				
277:20 – 278:10	402, 403, 602			

Deposition of Rick Augusto dePinho
July 13, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
472:8 – 17		471:18 - 472-7		
502:21 – 503:16	402, 403, 602, 701, unresponsive			
576:3 – 577:15	402, 403, 602, 701	575:1 - 576:2	401-403; 602	

Deposition of James Falk
April 20, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
37:4 – 12				
39:6 – 10				
39:12 – 41:11				
64:16 – 65:13				
70:6 – 71:3	402, 403, 602, 701 - 702			
74:19 – 77:14	402, 403, 602, 701 - 702			
84:9 – 19				
92:18 – 93:3				
93:12 – 95:14				
99:19 – 100:4	402, 403, 602			
100:7 – 8	402, 403, 602			
110:13 – 112:1	402, 403, 602			
123:15 – 124:10	402, 403, 602			
128:2 – 128:14	402, 403			
128:22 – 129:11	402, 403, 602, 701 - 702			
130:3 – 132:4	402, 403, 602, 802			
144:17 – 145:14	402, 403, 602, 701 - 702, 802			
145:17	402, 403, 602, 701 - 702, 802			
145:21 – 146:6	402, 403, 602, 701 - 702, 802	146:7 - 16	401-403	
146:22 – 147:4	402, 403, 602, 701 - 702, 802			
152:10 – 17	402, 403, 602, 802	152:18 - 153:1	401-403	
153:1 – 154:19	402, 403, 602, 802			
156:10 – 18	402, 403, 602, 802	156:19 - 157:12	401-403	
157:13 – 158:2	402, 403, 602, 802			
158:6 – 21	402, 403, 602, 802			
165:2 – 6	402, 403, 602,	165:7 - 15	401-403	

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
	802			
165:16 – 167:14	402, 403, 602, 802			
170:10 – 18	402, 403, 602, 802			
171:16 – 22	402, 403, 602, 802	172:1 - 12	401-403	
172:13 – 16	402, 403, 602, 802			
176:15 – 21	402, 403, 602, 802	176:22 - 177:6	401-403	
177:7 – 12	402, 403, 602, 802			
194:11 – 22	402, 403, 602			
197:1 – 16	402, 403, 602	197:17 - 198:15	401-403; non-responsive	
215:14 – 20	602			
216:6 – 8				
228:16 – 229:2				
229:13 – 230:11				
230:16 – 231:7				
232:4 – 18				
233:2 – 234:11	602, 701 - 702, 802			
235:1 – 6	602, 701 - 702, 802			
249:15 – 250:3	602, 701 - 702, 802			
250:17 – 251:14	401, 403, 602, 701 - 702, 802			
255:19 – 257:19	401, 403, 602, 701 - 702, 802			
258:1 – 13	401, 403, 602, 701 - 702, 802			
258:19 – 260:3	401, 403, 602, 701 - 702, 802			
264:19 – 22	401, 403, 602, 701 - 702, 802			
265:1 – 5	401, 403, 602, 701 - 702, 802			
265:14 – 266:12	401, 403, 602, 701 - 702, 802			

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
266:17 – 269:10	401, 403, 602, 701 - 702, 802			
269:14 – 271:3	401, 403, 602, 701 - 702, 802			
271:7 – 19	401, 403, 602, 701 - 702, 802			
272:20 – 273:10	401, 403, 602, 701 - 702, 802			
273:14 – 275:7	401, 403, 602, 701 - 702, 802			
275:11 – 21	401, 403, 602, 701 - 702, 802			
276:1 – 6	401, 403, 602, 701 - 702, 802			
277:17 – 20	401, 403, 602, 701 - 702, 802			
278:1 – 3	401, 403, 602, 701 - 702, 802			
281:20 – 282:11	401, 403, 602, 701 - 702, 802			
282:15 – 283:15	401, 403, 602, 701 - 702, 802			
283:21 – 285:3	401, 403, 602, 701 - 702, 802			

Deposition of James Falk
April 21, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
314:8 – 317:19	401, 403, 602, 701 - 702, 802			
320:1 – 321:9	401, 403, 602, 701 - 702, 802			
329:4 – 14	401, 403, 602, 701 - 702, 802			
333:16 – 334:18				
342:4 – 8	401, 403, 602, 701 - 702, 802			
342:17 – 18	401, 403, 602, 701 - 702, 802			
343:6 – 9, 15	401, 403, 602, 701 - 702, 802			
343:17 – 344:12				

Deposition of Mark Garrett
May 11, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
8:16 – 9:4				
12:5 – 21				
13:17 – 20				
13:22 – 14:3				
27:19 – 28:14				
29:9 – 22				
30:12 – 31:12				
58:17 – 18				
58:22 – 60:10				
63:1 – 4				
63:6 – 65:4				
65:20 – 67:7				
72:21 – 73:20				
77:13 – 14				
78:2 – 79:4				
90:6 – 92:17				
93:11 – 13				
93:16 – 17		96:22 - 97:11	outside scope	
96:16 – 19	602			
96:22 – 97:11	602			
97:13 – 98:2				
98:5 – 17				
100:10 – 101:13	602, 701-702			
122:19 – 123:10				
123:13 – 124:18				
132:11 – 134:12				
137:21 – 138:3	602, 701-702			
138:5 – 17	602, 701-702			
142:10 – 16	602, 701-702			
142:18 – 149:9	602, 701-702			
150:5 – 151:2				
152:2 – 153:11				
162:1 – 7				
163:19 – 164:3				
164:5 – 13				
165:10 – 167:22				
176:20 – 177:16				
196:15 – 199:1				

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
199:18 – 200:8				
204:1 – 6				
204:8 – 11		204:11 - 205:1		
207:8 – 208:2				
213:5 – 20		213:21 - 217:16		
217:17 – 218:12				
220:10 – 221:8	701-702			
221:11 – 223:3	701-702			
254:16 – 255:14				
257:17 – 258:16				

Deposition of Zachary Gilstein
May 11, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
7:15 – 17				
19:2 – 20:5				
20:11 – 22:4				
24:13 – 25:8				
32:14 – 33:17		33:18 - 34:11	401-403	
34:21 – 35:7		35:8 - 36:8	401-403	
36:9 – 37:1		35:8 - 36:8; 37:2 - 13	401-403	
44:19 – 45:13		45:19 - 47:4		
63:12 – 14				
63:20 – 21				
64:1 – 19				
69:17 – 70:12				
174:11 – 13				
174:16 – 175:1				
175:4 – 9				
185:20 – 186:9				
240:20 – 241:7				
242:19 – 243:2				

Deposition of Zachary Gilstein
May 12, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
271:13 – 273:19				
275:6 – 13				
276:15 – 277:1		277:2 - 278:18	401-403	
283:5 – 11				
283:18 – 22				
284:4 – 9				
284:20 – 285:3		285:8 - 15	outside scope	
288:21 – 289:9				
289:20 – 290:17				
293:22 – 294:3				
294:8 – 11				
300:1 – 301:1				
304:11 – 18		304:19 - 305:7	602	
305:13 – 305:20				
310:21 – 311:14				
313:14 – 314:22				
321:1 – 13		322:5 - 15; 325:9 - 13	401-403; outside scope	
328:5 – 10				
329:2 – 21				
340:15 – 341:20				
342:5 – 22				
348:10 – 350:14				
350:20 – 352:5				
354:7 – 17				
356:8 – 22				
359:12 – 360:10		360:11 - 361:3	401-403; 602	
361:4 – 11				
364:14 – 20				
365:12 – 17				
367:11 – 368:3				
372:8 – 373:2				
373:22 – 374:4				
374:14 – 17				
374:21 – 375:5				
375:8 – 376:5				
382:16 – 383:12				
392:8 – 393:5				
403:17 – 405:3				

Deposition of Zachary Gilstein
May 22, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
5:17 – 21				
13:4 – 12				
18:6 – 9				
24:11 – 25:2				
31:11 – 17		31:18 - 21		
85:23 – 87:4		87:5 - 88:3	602; outside scope	
97:18 – 98:8				

Deposition of Joseph Giordano
May 10, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
5:18 – 21				
31:12 – 32:5				
32:22 – 33:3				
55:13 – 56:14	402, 602			
57:1 – 11	402, 701 - 702			
58:23 – 60:20	402, 602, 501, 701-02			
61:22 – 62:3	402, 602			
70:12 – 71:3				
72:6 – 73:11	402, 602			
75:3 – 9	402, 602			
80:19 – 81:24	402, 501, 602			
97:2 – 12	402, 602			
97:20 – 98:2	402, 602			
98:25 – 99:23	402, 602			
106:7 – 14				
128:18 – 21	402			
132:15 – 19				
132:25 – 133:4				
133:14 – 23	402, 602			
137:4 – 12	402, 602			
137:19 – 24	402, 602			
139:11 – 140:1	402, 602			
145:21 – 146:4	402, 602			
147:18 – 149:7	402, 403, 602			
157:5 – 16	402, 602			
159:13 – 160:3				
161:25 – 162:17	402, 602			
171:21 – 172:17	402, 403,602			
175:4 – 16	402, 403			
186:21 – 187:5	402, 403, 602			
187:16 – 188:6	402, 602			
189:1 – 190:1	402			
191:10 – 20	402			
192:2 – 18	402, 403, 602			
194:23 – 195:6				
199:20 – 200:1	402			
211:12 – 21	402, 403, 602			
211:25 – 213:8	402, 403, 602,			

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
	802, 408			
216:5 – 10				
223:9 – 224:13	402, 403, 408, 602, 802			
237:24 – 239:7	402, 403, 602, 802			
240:2 – 241:10	402, 403, 602, 802	241:11 - 242:5	401-403; 602; outside scope	
242:6 – 243:8	402, 403, 602			
244:16 – 245:22	402, 403, 602, 802			
246:4 – 22	402, 403, 602, 802			
247:14 – 248:7	402, 403, 602			
248:22 – 249:7	402, 403, 501, 802			
250:7 – 252:11	402, 403, 501, 602, 802			
253:2 – 13	402, 403, 802			

Deposition of James Hammond
June 2, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
5:20 – 6:1				
41:7 – 18				
51:1 – 5				
51:24 – 52:15				
63:10 – 16				
89:16 – 23				
110:15 – 19				
111:6 – 112:6				
118:23 – 119:3		119:4 - 25; 120:10 - 25	602	
123:18 – 126:23		127:1 - 130:17; 133:7 - 20	401-403; 602; non-responsive	
133:21 – 25				
134:2 – 8				
134:19 – 135:10				
136:10 – 137:2		137:3 - 11	602	
143:21 – 144:5		144:11 - 145:5	602	
145:6 – 15		145:16 - 146:22	401-403; 602; non-responsive	
146:23 – 148:5				
148:13 – 22		148:23 - 149:22; 150:5 - 152:23; 161:7 - 24	602; non-responsive; outside scope	
172:7 – 15				

Deposition of Brian Holden
May 22, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
8:21 – 9:2				
13:22 – 15:4				
21:6 – 14				
23:5 – 14				
26:9 – 27:2				
30:10 – 16		40:19 - 42:13	401-403	30:21 – 31:1
32:6 – 33:5				

Deposition of Thierry Houdoin
April 5, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
ALL	Motion in Limine			
6:21 – 7:2		10:2 - 4; 130:5 - 16	401-403; 602	130:17-25
10:2 – 12:10				
14:12 – 15:25	601, 701-702, 802	16:8 - 16; 88:19 - 89:10	602	16:17-20
16:21 – 17:4	602, 802, 1002			
18:12 – 17	402, 403, 602, 701-702, 802			
18:21 – 19:8	402, 403, 602, 701-702, 802			
19:12 – 20:4	402, 403, 602, 701-702, 802			
33:14 – 25	402, 403, 701-702, 802			
35:12 – 36:19	Leading, 402, 403, 602, 701-702			
38:13 – 22				
39:7 – 41:23	602, 802, 1002			
42:2 – 43:6	602, 701-702, 802, 1002			
43:16 – 18	Leading, 403, 602, 701-702, 802, 1002			
43:21 – 45:3	Leading, 403, 602, 701-702, 802, 1002			
46:7 – 49:16	402, 403, 602, 701-702, 802, 1002			
49:18 – 50:8	Leading, 402, 403, 602, 701-702, 802, 1002			
50:10 – 14	Leading, 402, 403, 602, 701-702, 802			
50:22 – 52:15	602, 1002			
55:8 – 56:3				

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
57:8 – 13	Leading, 402, 403, 602, 701-702, 802			
57:16 – 58:23	Leading, 402, 403, 602, 701-702, 802			
61:7 – 9	402, 403, 602, 802			
61:12 – 23	402, 403, 602, 802			
62:14 – 63:10	402, 403, 602, 802			
70:23 – 72:22	1002			
74:23 – 75:10	Leading, 402, 403, 602, 802			
81:7 – 82:19	402, 403, 602, 701-702, 1002			
88:19 – 89:3				
97:20 – 99:13				
105:24 – 106:13	403, 1002			
107:9 – 22				
109:24 – 110:23	402, 403, 602, 701-702, 802, 1002			
113:8 – 114:20	402, 403, 602, 701-702, 802, 1002			
124:8 – 125:21				

Deposition of Steve Joroff[3]
February 25, 2007

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
4:18-21				
6:2-7				
10:2-3				
13:15-22				
14:14-23				
19:3-8				
19:14-18				
21:10 – 22:3				
23:5-17				
28:8-20				
31:3-10				
34:24 – 35:7				
35:25 – 36:7				
37:13-16				
37:25 – 38:12				
39:3-12				
41:4 – 42:5				
42:11-14				
42:17 – 43:5				
43:22 – 44:5				
44:20 – 45:8				
48:21 – 49:19				
53:14-20				
59:23 – 60:12				
60:22 – 61:15				
61:25 – 62:7				
66:12-21				
69:2-25				
70:23 – 71:8				
72:18 – 73:7				
74:22 – 75:5				
75:13 – 76:17				
77:2 – 79:4				
79:14-21				
80:21 – 81:10				

[3] The parties have not yet had an opportunity to exchange counter and reply designations or objections for these designations, but will work together to do so.

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
85:3 – 86:11				
88:3-6				
88:23 – 89:7				
89:23 – 90:10				
90:23 – 91:23				
94:3-24				
97:17 – 98:12				
98:17 – 99:12				
100:9-17				
102:5 – 103:10				
113:20 – 115:5				
116:18 – 117:15				
121:3-17				
122:14 – 123:8				
124:3-7				
124:16-20				
125:15 – 126:23				
127:13-19				
128:10-14				
128:25 – 129:4				
129:19 – 130:9				
133:18 – 134:4				
134:14 – 135:6				
135:10-18				
137:24 – 138:20				
140:18 – 141:17				
142:3-9				
142:17 – 143:10				
144:12 – 145:6				
147:6-25				
149:9-19				
152:13 – 153:5				
153:8 – 154:11				
154:22 – 155:2				
156:9-25				
157:20 – 158:7				
158:12-17				
159:20 – 160:23				
161:14-23				
163:6 – 164:3				
164:10-17				
168:18-24				

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
170:15 – 171:4				
171:8-16				
171:24 – 172:3				
172:13-21				
173:8-13				
174:3-10				
174:20 – 175:4				
175:21 – 176:19				
177:23 – 178:5				
178:14-16				
179:19-24				
181:19 – 182:22				
183:23 – 184:4				
199:15 – 200:9				

Deposition of Bruce Kittams[4]
April 28, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
6:6 – 10				
6:16 – 25		7:1-4		
8:7 – 14				
8:19 – 9:1				
9:8 – 10:7	402, 403	9:2		
11:4 – 9				
11:18 – 19				
11:22 – 12:11	402, 403			
12:14 – 13:2				
14:7 – 10		14:11-12		
14:13 – 17	402, 403	14:11-12; 14:18-19		
14:20 – 22	402, 403	14:23-15:2		
16:7 – 22		16:23-17:2		
17:16 – 18:4				
21:23 – 22:20				
23:9 – 15				
23:18 – 24:17				
24:21 – 26:3				
27:21 – 28:8		28:9-29:6	401-403	
30:10 – 31:20				
35:8 – 14				
35:18 – 36:12				
38:4 –11	402, 403	38:12-14		
51:25 –52:3	402, 403			
64:11 – 65:21	402, 403, 602, 701-702			
65:22 – 66:7	402, 403			
66:24 – 67:3	402, 403	66:16-23; 67:5-6		
67:7 – 68:25	402, 403, 602, 701-702, 802			
69:3 –18	402, 403, 602, 701-702, 802			
69:21– 22	402, 403, 602, 701-702, 802			

[4] The parties have not yet had an opportunity to exchange all counter and reply designations or objections for these designations, but will work together to do so.

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
70:10 – 14				
70:19 – 71:1				
71:3 – 21		71:22-72:2		
72:3 – 5	402, 403			
72:9 – 23	402, 403, 602, 802			
73:1 –19	402, 403, 602, 802			
73:23 – 74:3	402, 403, 602, 802			
74:13 – 21	402, 403			
78:23 – 79:7	701-702			
80:16 – 81:5	602, 701-702			
81:8 – 82:16	402, 403, 602	83:21		
89:20 – 90:20	602			
95:4 – 97:15	602, 802			
98:5 – 22				
101:8 – 25	602, 1002			
102:1 – 103:11				
103:14 – 104:9	602, 1002	103:12-13		
107:18 – 108:16	402, 403, 602, 802, 1002	109:16-110:14		
108:21 – 109:15	402, 403, 602, 701-702, 802, 1002	109:16-110:14		
111:13 – 112:1				
115:17 – 25	701-702, 1002	115:8-16		
117:4 – 118:9	701-702, 1002			
118:13 – 23				
120:23 – 121:6	1002			
121:10 – 122:9	402, 403, 602, 1002			
122:13 – 15	402, 403, 602, 1002			
123:14 – 124:4	402, 403, 602, 1002	121:10-25		
124:19 – 125:18	402, 403, 602, 1002	121:10-25		
130:6 – 10	402, 403, 602	15:18-17:2		
133:21 – 134:10	602, 802			
138:23 – 139:14	402, 403, 602, 701-702, 1002			

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
140:5 – 11	402, 403, 602, 701-702			
142:6 – 19	1002			
144:21 – 145:17	602, 1002			
147:1 – 9	402, 403	110:1-14; 153:23-154:21	401-403; 602	
158:24 – 25	402, 403, 602, 701-702	110:1-14; 153:23-154:21; 159:10-160:5	401-403; 602; non-responsive; outside scope	
159:4 – 9	402, 403, 602, 701-702	110:1-14; 153:23-154:21; 159:10-160:5	401-403; 602; non-responsive; outside scope	
163:25 – 164:3	402, 403, 602, 701-702	110:1-14; 153:23-154:21; 159:10-160:5	401-403; 602; non-responsive; outside scope	
164:7	402, 403, 602, 701-702	110:1-14; 153:23-154:21; 159:10-160:5	401-403; 602; non-responsive; outside scope	
164:13 – 14	402, 403, 602, 701-702	110:1-14; 153:23-154:21; 159:10-160:5	401-403; 602; non-responsive; outside scope	
166:1 – 4	602, 802, 1002			
166:14 – 167:8	402, 403, 602, 701-702, 1002			
170:6 – 171:8	402, 403, 602, 802			
172:8 – 25	402, 403, 602, 701-702, 802	173:1-5		
176:20 – 23	402, 403, 602, 802	200:1-202:16	401-403; 602; non-responsive; outside scope	
177:4 – 7	402, 403, 602, 802	200:1-202:16	401-403; 602; non-responsive; outside scope	
178:17 – 182:20	402, 403, 602, 701-702	200:1-202:16	401-403; 602; non-responsive; outside scope	
183:8 – 184:12	402, 403, 602, 701-702	200:1-202:16	401-403; 602; non-responsive; outside scope	
184:20 – 185:17	402, 403, 602	200:1-202:16	401-403; 602; non-responsive; outside scope	

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
186:25 – 187:10	402, 403, 602, 802	186:1-24; 187:11-19; 200:1-202:16	401-403; 602; non-responsive; outside scope	
205:20 – 21	402, 403, 602, 701-702	200:1-202:16	401-403; 602; non-responsive; outside scope	
206:1 – 3	402, 403, 602, 701-702	200:1-202:16	401-403; 602; non-responsive; outside scope	
206:6 – 7	402, 403, 602, 701-702	200:1-202:16	401-403; 602; non-responsive; outside scope	
206:12 – 14	402, 403	216:16-17	401-403	
213:5 – 11	402, 403	216:16-17	401-403	
213:16 – 21	402, 403	216:16-17	401-403	
214:1 – 4	402, 403	216:16-17	401-403	
214:8 – 9	402, 403	215:10-14; 216:16-17	401-403	
214:13 – 16	402, 403	215:10-14; 216:16-17	401-403	
214:19 – 215:9	402, 403	215:10-14; 216:16-17	401-403	
215:20 – 216:2	402, 403	215:10-14; 216:16-17; 216:3-15	401-403	

Deposition of Sang – Hoon Lee
April 13, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
27:11 – 23		26:4-26:14; 290:14-291:5; 326:24-328:3; 335:22-337:2	401-403; non-responsive	26:15-18
129:8 – 21	402, 403, 701	128:8-129:19, 129:22-130:4		
157:19 – 164:12		164:13-165:1	401-403; outside scope	
187:22 – 188:16		188:17-199:5	401-403; 602; 801-802	
199:6 – 19	602, 701			
206:6 – 10				
231:5 – 232:2	402, 403, 602, 701	228:18-229:19, 231:1-4	401-403	
234:25 – 235:12				
238:24 – 239:5		436:8-438:2, 448:10-14	401-403; 602	

Deposition of Sang – Hoon Lee
April 14, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
295:22 – 296:1	402, 403	182:12-183:3	401-403	
300:2 – 14	602, 701			
325:10 – 326:15	402, 403	157:19 – 165:1	401-403	
366:9 – 23	402, 403	150:17-151:5; 429:25-432:21	401-403; outside scope re 429:25-432:21	
448:15 – 23	602, 801-802			

Deposition of Tony Tong Lee
June 11, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
21:16 – 23:2		24:8 – 24:25		
26:15 – 23		26:24-27:12		27:13-22
27:23 – 28:8		28:9-14		28:15-29:11
43:6 – 15	402, 403 re: 43:13-15	43:17-18		
44:3 – 25				
67:25 – 68:16	402, 403			
81:23 – 82:2	402, 403	82:3-83:1		
85:19 – 88:18		85:16-18; 104:24-105:6; 111:11-18		105:7-11; 111:2-10
89:7 – 19				
97:11 – 25				
119:7 – 21		118:9-119:4		119:5-23
122:3 – 24	402, 403, 602	122:25-123:15		
133:23 – 134:16		132:24-133:22		
140:6 – 24				
148:12 – 24		148:25-149:7		
152:5 – 19		152:20-153:9; 163:2-12; 164:1-21		
170:20 – 171:13				
183:22 – 184:23		184:24 – 185:10		185:11-14
201:5 – 21				
204:14 – 21				
210:13 – 211:3	402, 403 re: 210:22-211:3	210:10-12		210:7-9
219:20 – 221:18		163:2-12; 164:1-21		
223:6 – 224:5	602 re: 223:20-224:4	225:12-227:8		227:9-228:9
231:11 – 22				
232:24 – 233:15	602	233:16-21		233:22-23
236:5 – 22				
248:18 – 25				
249:17 – 20	402, 403			
250:12 – 251:10		250:2-9; 251:11-19		250:9-11; 251:20-23
253:11 – 21		253:22-255:2		255:15-256:15

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
255:15 – 257:3		257:4-11		
257:12 – 23		257:24-259:3		259:4-12
260:6 – 261:9				
262:14 – 25		272:1-8		273:9-23
269:5 – 270:21		270:22-271:7		271:8-25
277:7 – 19				
278:20 – 25				
279:19 – 280:7	402, 403			
281:9 – 282:16		282:17-283:2; 283:7-23		
283:24 – 285:1				
285:25 – 286:24				
287:2 – 4		287:12-288:3		288:4-8
288:17 – 289:9		288:10-16		288:16-289:9
290:4 – 20		290:21-24		290:25-291:5
297:15 – 18				
298:17 – 23		298:24-299:2		299:3-12
299:14 – 300:8		300:9-21	outside scope	
301:11 – 13				
303:9 – 304:11		302:12-303:8		302:7-11
305:1 – 11		305:12-24		
305:25 – 306:19				
307:23 – 309:24		163:2-12; 164:1-21; 309:25-310:5		310:6-16
310:6 – 311:6		311:7-12		311:13-14

Deposition of Steven Minzer[5]
June 6, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
5:2 – 3				
6:20 – 7:11				
7:23 – 8:21				
11:21 – 12:14				
14:22 – 15:23				
17:2 – 8				
17:21 – 18:5				
20:5 – 8				
20:12 – 22:5				
28:17 – 29:3				
29:20 – 23				
41:13 – 20				
48:16 – 19				
49:2 – 9				
50:15 – 51:10				
52:18 – 53:17				
54:10 – 12				
56:11 – 24				
60:19 – 61:6				
61:16 – 63:25				
64:12 – 67:7				
129:9 – 25				
130:18 – 132:11				

[5] Pursuant to the parties' agreement, Defendants' designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

Deposition of Stanley Rosen
April 26, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
4:16 – 19				
8:6 – 17		8:18 - 11:19	401-403	
12:18 – 21				
30:8 – 24				
32:18 – 21				
33:11 – 14		34:8 - 19	602	34:20-23
37:14 – 38:4				
39:16 – 24				
43:23 – 44:8				
49:16 – 50:2				
53:4 – 24				
55:14 – 56:4				
59:4 – 11				
61:3 – 9				
61:16 – 19				
61:24 – 63:12				
66:6 – 12				
69:13 – 70:9				
73:3 – 18				
76:16 – 23				
77:4 – 78:4				
79:4 – 24				
92:17 – 22				
94:11 – 95:4		95:6 - 10	602	
108:9 – 12				
146:9 – 147:10				
177:13 – 179:20				

Deposition of William Rubin
June 2, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
14:8 – 19	402, 403 re: 14:16-19			
20:12 – 21	402, 403			
27:19 – 28:11	402, 403	24:24 - 26:13	401-403; 602; outside scope	
50:6 – 51:3	402, 403	51:4 - 53:19	602	
60:3 – 14	402, 403	60:15 - 61-15	401-403; 602	61:16-22
61:16 – 22	402, 403; 602; 802	60:15 - 61-15	401-403; 602	
89:5 – 11	402, 403; 602; 701; 802	51:4 - 53:19	602	
92:2 – 14	402, 403; 602; 701; 802	51:4 - 53:19	602	
102:14 – 104:9	402, 403			
105:1 – 106:9	402, 403; 602; 701	106:10 - 107:14	401-403; 602; non-responsive	
114:9 – 16	402, 403; 602; 802	115:2 - 6		
120:8 – 17	402, 403; 602; 802	115:7 - 118:23	401-403, 801-802; 602	
121:3 – 18	402, 403; 602; 802	121:19 - 123:1	401-403; 602	
123:16 – 125:9	402, 403; 602; 802	125:10 - 126:7	401-403; 602	
146:3 – 21	402, 403; 602; 701; 802	140:22 - 142:14	401-403	
151:7 – 22	402, 403; 602; 701; 802	147:10 - 151:4	401-403	
156:21 – 157:1	402, 403; 602; 701; 802	147:10 - 151:4	401-403; outside scope	
160:1 – 6	402, 403; 602; 701; 802	147:10 - 150:5; 157:20 - 158:25	401-403; 602; outside scope	
185:25 – 186:9	402, 403			

Deposition of Walter David Sincoskie
May 18, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
7:16 – 19				
8:2 – 6				
67:4 – 15				
73:2 – 8	402, 403; 602; 701	72:11 - 18	401-403	
103:18 – 105:14	402, 403; 602; 701	99:17 - 102:19	401-403; 602; 701	
150:5 – 22	402, 403; 602; 701	72:11 - 18; 150:21 - 154:14	401-403; 602	
154:19 – 156:16	402, 403; 602; 701	150:21 - 154:14	401-403	
157:14 – 159:8	402, 403; 602; 701	72:11 - 18; 150:21 - 154:14; 156:17 - 157:4	401-403; 602	159:11-13
159:11 – 160:9	402, 403; 602; 701	72:11 - 18; 156:17 - 157:4	401-403; 602	
160:20 – 161:2	402, 403; 602; 701	150:21 - 154:14	401-403;	
161:17 – 162:4	402, 403; 602; 701	72:11 - 18; 156:17 - 157:4	401-403	
167:17 – 168:16	402, 403; 602; 701	72:11 - 18; 156:17 - 157:4; 166:9 - 167:15	401-403; 602	
190:9 – 193:3	402, 403; 602; 701	72:11 - 18; 99:17 - 102:19	401-403; 602	
196:15 – 22	402, 403; 602; 701			
199:6 – 201:11	402, 403; 802; 1002			
204:15 – 205:2	106; 402, 403; 602; 802; 1002	205:14 - 15		205:14 – 206:11
205:14 – 206:11	402, 403; 602; 802; 1002			
206:14 – 19	402, 403; 602; 802; 1002			
216:21 – 217:6	402, 403; 802; 1002	217:7 - 5	Counter-designation is incomplete. To the extent Telcordia mean "217:7-218:5" object as non-responsive	218:6-219:4
218:6 – 221:8	402, 403; 602; 802; 1002	217:7 - 5	Counter-designation is	

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
			incomplete. To the extent Telcordia mean "217:7-218:5" object as non-responsive	
221:11 – 14	402, 403; 602; 802; 1002	217:7 - 5	Counter-designation is incomplete. To the extent Telcordia mean "217:7-218:5" object as non-responsive	218:6-219:4
222:4 – 225:13	402, 403; 602; 802; 1002			
226:20 – 227:21	402, 403; 602; 701	230:10 - 19	801-802	
228:7 – 11	402, 403; 602; 701	230:10 - 19	801-802	
230:10 – 14	106; 402, 403; 602; 701			
230:17 – 231:13	106; 402, 403; 602; 701	232:1 - 233:22	401-403; 602; 801-802	
233:2 – 7	402, 403; 602; 701	232:1 - 233:22	401-403; 602; 801-802	
234:13 – 22	402, 403; 602; 701	232:1 - 233:22	401-403; 602; 801-802	
245:13 – 17	106; 402, 403; 602; 701	244:10 - 245:12		
245:20	106; 402, 403; 602; 701	244:10 - 245:12		
246:2 – 5	106; 402, 403; 602; 701	244:10 - 245:12		
246:8	106; 402, 403; 602; 701	244:10 - 245:12		
254:1 – 19	402, 403; 602; 701			
260:5 – 13	402, 403; 602; 1002	72:11 - 18; 156:17 - 157:4	401-403; 602	

Deposition of Walter David Sincoskie
May 19, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
299:11 – 4				
332:22 – 333:14	602; 701			
337:21 – 338:10	402, 403; 602; 701	72:11 - 18		
349:10 – 15	402, 403; 701			
350:4 – 7	402, 403; 701	72:11 - 18		
352:20 – 22	402, 403			
353:10 – 21	402, 403			
379:1 – 18	402, 403; 602; 701			
384:4 – 20	402, 403; 602; 701	72:11 - 18; 383:1 - 5	602; outside scope re 72:11-18	
395:18 – 396:2	402, 403			
404:4 – 10	402, 403	404:11 - 407:3	401-403; 602	
407:5 – 408:6	402, 403; 602	408:7 - 409:19		
413:11 – 414:4	402, 403; 602; 701			
431:8 – 14	402, 403; 602; 701	424:19 - 425:14; 430:8 - 431:7	401-403; 602; outside scope re 430:8-431:7	
443:4 – 9	402, 403			
451:3 – 452:7	402, 403			
459:18 – 460:4	402, 403; 701			
463:10 – 464:7	402, 403; 701	464:9 - 16		
491:6 – 16	402, 403; 802; 1002; FRCP 32(a) (see pg. 470)	424:19 - 425:14		
492:13 – 21	402, 403; 802; 1002; FRCP 32(a)			
493:8 – 494:18	402, 403; 602; 802; FRCP 32(a)			
494:20 – 496:1	402, 403; 602; FRCP 32(a)			
496:13 – 18	402, 403; FRCP 32(a)			
502:21 – 503:10	402, 403; 602; FRCP 32(a)	535:20 - 537:7	401-403; non-responsive	
505:1 – 19	402, 403; 602; 802; FRCP 32(a)	535:20 - 537:7	401-403; non-responsive	
513:8 – 21	402, 403;	514:20 - 515:9	401-403; 602	

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
	FRCP 32(a)			
517:2 – 13	402, 403; FRCP 32(a)	514:20 - 515:9	401-403; 602; outside scope	
523:11 – 524:5	402, 403; FRCP 32(a)			
537:13 – 538:12	402, 403; 602; FRCP 32(a)	514:20 - 515:9; 538:13 - 539:1; 545:21 - 546:17	401-403; 602	
540:1 – 17	402, 403; 1002; FRCP 32(a)			
541:21 – 542:17	402, 403; 602; 802; FRCP 32(a)	542:18 - 543:13	401-403; 602	
544:21 – 545:2	402, 403; FRCP 32(a)			
545:8 – 20	402, 403	514:20 - 515:9; 538:13 - 539:1; 545:21 - 546:17	602	546:20 – 548:8
548:20 – 549:5	402, 403; 602; 802	546:4 - 17		
550:10 – 551:10	402, 403; 802; 1002	514:20 - 515:9; 538:13 - 539:1; 545:21 - 546:17	602	546:20 – 548:8
560:16 – 561:20	402, 403	559:1 - 560:14	401-403	

Deposition of Leonard Suchyta
June 13, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
12:18 – 13:2				
16:21 – 17:6	402			
17:18 – 23	402			
20:20 – 21:4				
24:17 – 25:7				
46:11 – 22	402, 403, 602, 701 - 702			
52:4 – 14	402, 403, 602, 701 - 702			
55:5 – 13	402, 403, 602			
67:5 – 6	402, 602			
67:11 – 13	402, 602			
67:16 – 20	402, 602			
68:12 – 25	402, 602			
69:4	402, 602			
69:16 – 70:3	402, 602			
70:19 – 71:19	402, 602			
77:14 – 19	402, 602			
82:15 – 24	402, 602			
83:4 – 9	402, 602			
86:9 – 25	402, 602, 802			
89:17 – 90:12	402, 802			
90:22 – 91:2				
91:14 – 92:5	402, 602			
93:8 – 15	402, 602			
98:21 – 24	402, 602			
99:3	402, 602			
109:3 – 23	402, 403, 602			
146:13 – 147:4	402, 403, 602, 802			
202:9 – 203:8	402, 403, 602, 802			
222:9 – 225:14				
226:15 – 227:11				
227:13 – 228:7				
229:7 – 13				
230:9 – 24				
232:3 – 14				
232:25 – 234:19				
236:3 – 4				
236:10 – 12				

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
236:21 – 237:16				
241:17 – 19				
243:7 – 244:3	402, 403, 602			
250:8 – 251:21	402, 403, 602, 701 - 702, 802			
253:16 – 25	402, 403, 602, 701 - 702, 802			
259:22 – 261:12	402, 403, 602, 802			
263:23 – 264:7	402, 403, 602, 701 - 702, 802			

Deposition of Liang Wu
April 20, 2006

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
6:18 – 22		22:13-23:13	401-403	
134:22 – 135:8				
135:17 – 136:4		136:5-137:11	401-403	
138:11 – 140:10	402, 403	140:11-142:10, 144:5-10, 146:15-149:22	401-403; non-responsive; outside scope	
146:10 – 14				
175:2 – 23	402, 403; not testimony re: 175:12-18; discusses inadvertently produced privileged document (document not returned in accordance with terms of protective order).			

Deposition of Liang Wu
April 21, 2006 (Volume 2 Part 1)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
32:17 – 33:4	402, 403	33:5-7		
33:8 – 14				
46:16 – 47:4				
56:12 – 19	402, 403	144:5-10, 146:15-149:22 {4/20/06}	401-403; non-responsive per 611	
61:9 – 18		60:19-61:8, 61:19-24 {4/21/06}; 144:5-10, 146:15-149:22 {4/20/06}	401-403; non-responsive per 611	
88:18 – 25	402, 403			
91:22 – 92:14		77:8-78:18, 129:20-131:3 {4/20/06}	401-403	
96:2 – 11		96:12-98:7	401-403	
103:14 – 105:14		96:12-98:1, 102:6-103:13	401-403	
106:7 – 16		106:17-107:7		
107:8 – 20		107:21-108:8	401-403; 611 per attorney comments	
108:9 – 109:10		111:4-8	401-403	111:9-13
112:16 – 25		122:7-123:11, 124:11-23	401-403	
129:19 – 130:17		129:3-18 {4/21/06}; 32:17-34:11, 102:22, 103:11-107:21 {4/20/06}	401-403; 602; 801-802	
135:13 – 25		133:18-134:5, 134:18-135:12, 145:12-146:4	401-403; 602; non-responsive per 611	
147:12 – 23		147:24-151:14	401-403	
173:3 – 174:23		170:5-173:2 {4/21/06}; 77:8-78:18, 129:20-131:3 {4/20/06}	401-403	
179:18 – 20	402, 403	178:8-179:17	401-403	
180:9 – 181:3		179:24-180:8	401-403	

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
188:23 – 189:22		189:23-190:16	401-403	
199:4 – 7	402, 403, 602			
199:19 – 25	402, 403, 602			
210:14 – 212:4	402, 403	210:6-13, 212:19-213:19 {4/21/06}; 88:11-23, 90:2-10, 108:19-110:10, 113:11-114:5, 134:7-21, 194:7-21 {4/20/06}	401-403; 602	
214:14 – 215:3				
223:2 – 20	402, 403 re: 223:2 and 223:19-20			
226:1 – 10	402, 403 re: 226:9-10			
226:17 – 227:7				
227:20 – 228:13		228:14-17 {4/21/06}; 77:8-78:18, 129:20-131:3 {4/20/06}	401-403; 602	
232:7 – 13	402, 403			
232:23 – 233:2	402, 403			
234:7 – 235:25	402, 403, 602			
245:14 – 25	402, 403 re: 245:14	242:9-243:3	401-403	
248:22 – 25	402, 403			
257:9 – 258:25	402, 403	259:1-11	401-403; 602	
260:19 – 261:2	402, 403			
262:2 – 11	402, 403	262:12-17, 263:4-265:8	401-403	
265:9 – 20	402, 403			
270:6 – 17	402, 403			
272:7 – 24	402, 403	263:4-265:8, 271:4-272:6, 273:3-13	401-403	
273:14 – 274:7	402, 403 re: 274:4-7	262:12-17; 271:14-272:6	401-403	
291:4 – 8	402, 403			
292:5 – 10	402, 403			
303:9 – 16	402, 403	303:2-8, 303:17-304:5	401-403; 602	

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
308:12 – 309:15	701			

Deposition of Liang Wu
April 21, 2006 (Volume 2 Part 2)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
248:20 – 250:7				

Deposition of James Falk
July 27, 1999 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
29:12 – 25	402, 403, 501, 602	30:1 - 30:18	602	
31:11 – 15	402, 403, 602	31:18 - 31:23	401-403; outside scope	
34:10 – 14	402, 403, 602	34:15 - 34:21		
63:13 – 64:2	402 - 403, 602, 701 - 702			
132:10 – 133:7	402 - 403, 602, 701 - 702			

Deposition of John Limb
July 9, 1999 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
6:5 – 7:2	403, 602, 701	39:1 - 42:19; 44:20 - 24; 46:18 - 50:8	401-402; 602	
9:8 – 10:5				
12:6 – 14:23	402			
16:12 – 17:16	403, 602, 701			
18:2 – 20:2	403, 602, 701, 1002 re: 18:2 - 7			
20:14 – 16				
21:9 – 22:24				
23:17 – 24:20	402, 602, 701, 1002			
35:1 – 38:11	402, 602, 701, 1002			
50:10 – 51:15	402, 602, 701			
54:4 – 9	402, 602, 701, 1002			
54:16 – 21	402, 602, 701, 1002			
56:7 – 15	402, 602, 701, 1002	55:1 - 20		
56:18 – 57:16	402, 602, 701, 1002	57:21 - 58:18		
58:19 – 59:14	402, 602, 701, 1002	61:2 - 62:8		63:12-16
64:23 – 66:18	402, 602, 701, 1002	64:1 - 22		
67:13 – 68:10	402, 602, 701, 1002	66:19 - 67:11		
89:11 – 17	402, 602, 701, 1002			
99:7 – 10	602			
100:13 – 101:1	402, 602, 701, 1002			
107:21 – 108:4	402			

Deposition of Brian Holden
August 18, 1999 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
11:4 – 11:18				
11:21 – 22				
11:24 – 12:11				
15:2 – 19	403, 602, 801 - 803			
27:7 – 23	403			
28:8 – 18	403, 602, 801 - 803			
28:23 – 32:4	403	68:25 - 69:24; 70:12 - 71:5; 79:7 - 84:10	401-403; 602	
32:22 – 36:15	403, 701	39:8 - 40:7		
50:10 – 51:15	403, 602, 701			
51:17 – 52:5	403, 701			
57:11 – 58:19	403, 701			
59:7 – 19	403, 701			
60:23 – 63:12	403, 701			
66:21 – 67:23	403, 701			

Deposition of Steven Minzer[6]
July 20, 1999 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
19:19 – 21:24				
38:6-9				
38:25 – 39:14				
41:3-11				
44:3-9				
44:21-24				
57:18-21				
62:11-12				
69:5-24				
70:8 – 71:1				
73:22 – 74:13				
74:16 – 75:16				
140:16 – 142:1				
164:6-16				
165:21 – 166:6				

[6] Pursuant to the parties' agreement, Defendants' designations for this available witness will only be used in the event the witness later becomes unavailable. If and when this witness becomes unavailable, the parties will work together to exchange counter and reply designations and/or objections for these designations.

Deposition of Liang Wu
June 10, 1999 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
73:19 – 24		74:23 - 25		
74:6 – 10				
75:1 – 5		75:6 - 12	401-403	
75:13 – 25				
76:1 – 11		76:12 - 77:23	401-403	
109:6 – 20		109:21 - 112:15	401-403; 602; 701	
149:7 – 18	602	148:3 - 149:6; 149:19	401-403; 602; incomplete counter	

Deposition of Liang Wu
June 11, 1999 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
197:19 – 198:12		198:19 - 199:2; 199:11 - 201:6	401-403	

Deposition of Liang Wu
June 20, 1999 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
4:15-18		4:6 - 10		
5:14-23		5:6 - 11		
7:5-16				
13:13-20		12:9 - 20	401-403; 602	
17:14 – 18:23	403, 701	17:7 - 13		
19:21 – 20:7	403, 701	20:8 - 20; 26:22 - 27:11; 32:25 - 33:22	401-403; 602; 801-802	
44:19 – 45:3	701	42:2 - 11	401-403	
46:1-7	701	45:13 - 24; 46:8 - 17	401-403;	
46:21 – 47:9				
48:2-20	701			
62:16-19	403, 701	74:6 - 74:17	602	
71:18 – 72:6		72:7 - 73:15	401-403; 602	

Deposition of Sang-Hoon Lee
August 17, 1999 Vol. 2 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
19:5-16				
92:22-24		90:3 - 92:21; 92:25 - 94:23	401-403; 602	
147:3-14				

Deposition of Sang-Hoon Lee
August 18, 1999 Vol. 2 (from *Fore Systems*)

DEFENDANTS' DESIGNATIONS	TELCORDIA'S OBJECTIONS	TELCORDIA'S COUNTER-DESIGNATIONS	DEFENDANTS' OBJECTIONS	DEFENDANTS' REPLY DESIGNATIONS
185:13 – 186:10				
188:6-19		188:20 - 189:10		
212:12-22		213:2 - 214:21	401-403	
265:3-16	403	265:17 - 266:2		
325:25 – 326:4		326:5 - 21	401-403	
340:17 – 341:4		341:5 - 344:25	401-403	

EXHIBIT G

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. LUCENT TECHNOLOGIES, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04-875-GMS
TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. CISCO SYSTEMS, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04-876-GMS

EXHIBIT G: ITEMIZED STATEMENT OF SPECIAL DAMAGES

I. TELCORDIA'S STATEMENT

Telcordia asserts that Cisco's and Lucent's infringement has been, and continues to be, willful. As such Telcordia seeks enhanced damages. Telcordia has also requested a finding that this is an exceptional case and is seeking an award of its attorneys' fees and costs.

II. CISCO'S STATEMENT

Cisco states that this case should be declared exceptional and is seeking to recover attorneys' fees and costs.

III. LUCENT'S STATEMENT

Lucent states that this case should be declared exceptional and is seeking to recover attorneys' fees and costs.

EXHIBIT H

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. LUCENT TECHNOLOGIES, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04-875-GMS
TELCORDIA TECHNOLOGIES, INC., Plaintiff/Counterclaim Defendant, v. CISCO SYSTEMS, INC., Defendant/Counterclaim Plaintiff.	)	C.A. No. 04-876-GMS

EXHIBIT H: JOINT STATEMENT OF WAIVERS OF CLAIMS AND DEFENSES

I. TELCORDIA'S STATEMENT

Telcordia has not abandoned or waived any of its claims or defenses.

II. CISCO'S STATEMENT

Cisco has not abandoned or waived any of its claims or defenses.

III. LUCENT'S STATEMENT

Lucent has not abandoned or waived any of its claims or defenses.