IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

DEFENDANT LUCENT TECHNOLOGIES INC.'S FIRST NOTICE OF 30(B)(6) DEPOSITION TO PLAINTIFF TELCORDIA TECHNOLOGIES, INC.

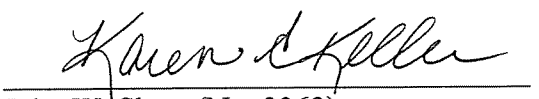
PLEASE take notice that on September 28, 2005, Defendant Lucent Technologies Inc. ("Lucent") will take, pursuant to Federal Rule of Civil Procedure 30(b)(6), the deposition upon oral examination of Plaintiff Telcordia Technologies Inc. ("Telcordia"), at the offices of Young Conway Stargatt & Taylor, The Brandywine Building 1000 West Street, 17th Floor, Wilmington, Delaware 19801. The deposition will take place before a duly-qualified notary public or other office authorized by law to administer oaths. Telcordia shall designate one or more officers, agents or other persons who can testify on its behalf as to all matters known or reasonably available to the corporation regarding the matters set forth below in Schedule A attached hereto. Additionally, pursuant to Federal Rule of Civil Procedure 30(b)(5), Lucent requests that Telcordia produce documents with respect to the subject matters set forth in the attached Schedule B by the close of business on September 26, 2005.

The deposition will commence at 9:00 AM on September 30, 2005, and will continue day to day until completed. The deposition shall be recorded by stenographic means and may also be videotaped. The deposition will be conducted in accordance with the Federal Rules of Civil Procedure.

Dated: August 26, 2005

Respectfully submitted,

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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Dated: August 26, 2005

SCHEDULE A

INSTRUCTIONS AND DEFINITIONS

1. For all of the topics, the Definitions and Instructions set forth in Lucent's First Set of Interrogatories to Plaintiff apply as if fully set forth herein.

2. The term "Patents-in-suit" shall mean U.S. Patent Nos. 4,893,306, Re. 36,633, and 4,835,763.

3. The term "ANSI" shall mean "American National Standards Institute."

4. The term "ITU" shall mean "International Telecommunication Union."

5. The term "aware" shall mean when Telcordia had actual notice that Lucent's product were allegedly infringing the Patents-in-suit. *See, e.g., Advanced Cardiovascular Sys., Inc., v. Scimed Life Sys., Inc.*, : 988 F.2d 1157, 1161 (Fed. Cir. 2003).

6. "Lucent" shall include all subsidiaries, affiliates, and predecessors, and specifically shall include Ascend Communications, Inc., Cascade Communications Corp., and Yurie Systems, Inc.

7. The term "OSMINE" shall mean the Operations System Modifications for the Integration of Network Elements.

TOPICS OF THE DEPOSITION

Topic No. 1.

The dates of conception, reduction to practice, and diligence there between for each claim of the '306, '978, and '633 patents, and the identity of all documents supporting such dates.

Topic No. 2.

The dates of conception, reduction to practice, and diligence there between for the asserted claims of the '763 patent, and the identity of all documents supporting such dates.

Topic No. 3.

The dates and circumstances under which Telcordia first learned of the CBX-500, CBX-3500, GX-550, PSAX 1000, PSAX 1250, PSAX 2300, PSAX 4500, and DMX Access Multiplexer products.

Topic No. 4.

The dates and circumstances under which Telcordia first became aware that Lucent's products, including the CBX-500, CBX-3500, GX-550, PSAX 1000, PSAX 1250, PSAX 2300, PSAX 4500, and DMX Access Multiplexer products, were allegedly infringing the Patents-in-suit.

Topic No. 5.

The dates and circumstances under which Telcordia first became aware that any Lucent product, including the CBX-500, CBX-3500, GX-550, PSAX 1000, PSAX 1250, PSAX 2300, PSAX 4500, and DMX Access Multiplexer products, was compliant with ANSI Standard T1.630, ATM Forum Circuit Emulation Service Interoperability Specification, Version 2.0, af-vtoa-0078.000, and/or ITU-T Standard I.363.1.

Topic No. 6.

Telcordia's statement that its "U.S. Patent No 5,260,978 for Synchronous Residual Timestamp (SRTS) Timing Recovery in a Broadband Network may apply to the ATM Adaptation Layer Type 1 (AAL1) ANSI Standard (T1.630-1993) referenced in Section 3.4 of [ATM Forum Circuit Emulation Service Interoperability Specification, Version 2.0, af-vtoa-0078.000, January 1997]." *See Ex. A.* (ATM Forum Circuit Emulation Service Interoperability Specification, Version 2.0, af-vtoa-0078.000, January 1997, at viii).

Topic No. 7.

The dates and circumstances under which Telcordia first became aware that any Lucent product was allegedly performing Synchronous Residual Timestamp (SRTS) Timing Recovery.

Topic No. 8.

The dates and circumstances under which Telcordia first became aware that any Lucent product was allegedly complying with GR-1400.

Topic No. 9.

The diligence performed by Telcordia prior to asserting each of the Patents-in-suit against Lucent, and Telcordia's bases for asserting each of the Patents-in-Suit against Lucent.

Topic No. 10.

Telcordia's testing and/or certification of Lucent products, including, but not limited to, Telcordia's OSMINE process.

Topic No. 11.

The identity of all Lucent products, including but not limited to Lucent's CBX-500, CBX-3500, GX-550, PSAX 1000, PSAX 1250, PSAX 2300, PSAX 4500, and DMX Access Multiplexer products, that have undergone any Telcordia testing and/or certification process, including, but not limited to Telcordia's OSMINE process; all reports issued by Telcordia referring or relating to such certifications and the dates of such certifications; and all reasons as to why certification reports were not issued relating to any of such certifications.

Topic No. 12.

Testing by Telcordia of any Lucent product accused of infringement in this case and the dates when such testing began, including all testing by Telcordia of Lucent products for performance of Synchronous Residual Timestamp (SRTS) Timing Recovery and for compliance with GR-1400.

Topic No. 13.

Telcordia's licensing practices, including all licensing and attempts to license any patents related to data network products, processes, or technologies, and/or packet processing products.

Topic No. 14.

All licenses and attempts to license any of the Patents-in-suit, including but not limited to the licenses listed in Telcordia's Supplemental Responses to Lucent's Interrogatory No. 4.

Topic No. 15.

Telcordia's compliance with the patent policies of the standards setting bodies of which Telcordia is or has been a member (such as the ATM Forum, ANSI, and ITU), including Telcordia's policy of making its "patents . . . available for licensing on a non-exclusive and nondiscriminatory basis and at reasonable royalties." *See* Feb 3, 1995, ATM Forum Patent Declaration of Bellcore.

Topic No. 16.

For each Patent-in-suit, the licensing terms Telcordia contends are fair, reasonable, and nondiscriminatory.

Topic No. 17.

Telcordia's statement that the "enforcement and licensing of the SRTS patent is worth more today than any other IP held by Telcordia." *See Ex. B* (http://www.telcordia.com/innovation/fellows.html.)

Topic No. 18.

The identity of all parties who received the January 8, 1997, letter titled "Re: Licensing of Bellcore's ATM patent portfolio" by Bruce P. Sidran, Director, Business Development and Licensing; the identity of all parties who responded to this letter; and the identity of all licenses taken under the terms of this letter.

Topic No. 19.

The identity of all parties who received the April 12, 1999, letter titled "Re: Telcordia Technologies, Inc.'s Intellectual Property" by Vincent P. Kovalik, and the identity of all parties who responded to this letter.

Topic No. 20.

All facts underlying any Telcordia contention that Lucent received notice of and/or was made aware of any patent-in-suit prior to Telcordia's assertion of the patents-in-suit in this litigation.

Topic No. 21.

The operation of any product made, used, or sold by Telcordia that Telcordia contends is covered by one or more claims of any of the Patents-in-suit.

Topic No. 22.

The identity of all Telcordia products that interface with any Lucent product, including but not limited to Lucent's CBX-500, CBX-3500, GX-550, PSAX 1000, PSAX 1250, PSAX 2300, PSAX 4500, and DMX Access Multiplexer products, including Telcordia's Activator Adaptor, Inventory Adaptor, and Surveillance Manager Adaptor products.

Topic No. 23.

The function and purpose of all Telcordia products that interface with any Lucent product, including but not limited to Lucent's CBX-500, CBX-3500, GX-550, PSAX 1000, PSAX 1250, PSAX 2300, PSAX 4500, and DMX Access Multiplexer products, including Telcordia's Activator Adaptor, Inventory Adaptor, and Surveillance Manager Adaptor products.

Topic No. 24.

Testing of all Telcordia products that interface with any Lucent product, including but not limited to Lucent's CBX-500, CBX-3500, GX-550, PSAX 1000, PSAX 1250, PSAX 2300, PSAX 4500, and DMX Access Multiplexer products, including Telcordia's Activator Adaptor, Inventory Adaptor, and Surveillance Manager Adaptor products, for compatibility with the accused products; the dates when such testing occurred; and the results of such testing.

Topic No. 25.

All efforts to market, sell, and/or use Telcordia products that interface with any Lucent product, including but not limited to Lucent's CBX-500, CBX-3500, GX-550, PSAX 1000, PSAX 1250, PSAX 2300, PSAX 4500, and DMX Access Multiplexer products, including Telcordia's Activator Adaptor, Inventory Adaptor, and Surveillance Manager Adaptor products, with the accused products.

Topic No. 26.

All Telcordia products that compete with the accused products.

Topic No. 27.

The prosecution of the applications that matured into U.S. Patent Nos. 5,260,978 and Re. 36,633, including but not limited to the reasons why each of the prior art references listed in Paragraph 86 of Lucent's Answer and Counterclaims to Telcordia's Amended Complaint were not submitted to the United States Patent and Trademark Office ("PTO") during the prosecution of the application that matured into U.S. Patent No. 5,260,978, and the reasons why each of those prior art references were submitted to the PTO during the prosecution of the application that matured into U.S. Patent. No. Re. 36,633.

Topic No. 28.

The dates on which each individual involved with the prosecution of the '978 and/or '633 patent, including but not limited to each of the named inventors and the prosecuting attorneys, became aware of each of the prior art references listed in Paragraph 86 of Lucent's Answer and Counterclaims to Telcordia's Amended Complaint.

Topic No. 29.

All efforts taken by Telcordia to ensure that licensees of the Patents-in-suit and all other parties practicing any invention claimed in the patents-in-suit for the licenses of the patent-in-suit complied with 35 U.S.C. § 287.

Topic No. 30.

The dates and circumstances under which Telcordia contends Lucent first received notice of each of the Patents-in-suit.

Topic No. 31.

The identity of all products or parties that you are aware of since the issuance of the patents-in-suit that practice any invention claimed in the patents-in-suit.

Topic No. 32.

The organizational structure of Telcordia, including, but not limited to, the engineering, research and development, marketing, sales, and/or customer service divisions of Telcordia, for each year from 1989 to the present, including, but not limited to, the officers, directors, supervisors and/or managers of such divisions.

Topic No. 33.

The location and identity of all documents and things searched, considered, identified, reviewed or collected in determining Telcordia's response to Lucent's interrogatories, document requests, and this Deposition Notice.

Topic No. 34.

The persons who searched, considered, identified, reviewed, or collected any documents or things in determining Telcordia's response to Lucent's interrogatories, document requests, and this Deposition Notice; the dates on and locations at which each such person considered, identified, reviewed, and/or collected any documents or things in response to Lucent's interrogatories, document requests, and this Deposition Notice.

Topic No. 35.

The persons, both inside and outside of Telcordia, contacted or consulted in determining Telcordia's response to Lucent's interrogatories, document requests, and this Deposition Notice.

Topic No. 36.

The policies regarding retention or destruction of documents and things at Telcordia and the persons responsible for developing, managing, revising, and enforcing those policies.

Topic No. 37.

The identity of all current and past industry standards and/or generic requirements, the practice of which Telcordia contends requires a license to one or more of the patents-in-suit.

EXHIBIT A



The ATM Forum
Technical Committee

Circuit Emulation Service Interoperability Specification Version 2.0

af-vtoa-0078.000

January 1997

Circuit Emulation Service Interoperability Specification

af-vtoa-0078.000

January 1997

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Notice:

Bellcore asserts that its U.S. Patent No 5,260,978 for Synchronous Residual Timestamp (SRTS) Timing Recovery in a Broadband Network may apply to the ATM Adaptation Layer Type 1 (AAL1) ANSI Standard (T1.630-1993) referenced in Section 3.4 of this specification.

EXHIBIT B

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Telcordia Fellows

Richard Lau (2004)

Richard is responsible for one of the most important and valuable inventions in Telcordia's patent portfolio, the SRTS patent, which describes the use of time stamping techniques which enable modern asynchronous high speed communications. This invention has been exploited by almost all major telecommunication network equipment providers. The enforcement and licensing of the SRTS patent is worth more today than any other IP held by Telcordia.

Richard has been instrumental in bridging the gap between organizations, where the emphasis is on technology creation, and where the driver is commercial viability. Richard was inducted into the New Jersey Hall of Fame and received Inventor of the year award in 1997 for his invention in high speed optical self-healing ring. He has garnered international recognition as an expert on ATM and on advanced wireless technologies. He has published extensively and is sought after as a speaker. He has contributed many invited papers over the years and continues to do so.

Michelle Wolberg (2004)

Michelle has made significant and fundamental contributions to the automation of RBOC operations through her work in the design and development of leading-edge Operations Support Systems (OSSs). Michelle has a breadth of unique accomplishments including: architecture and definition of the Bellcore Computer Center in support of the AT&T divestiture-supporting one of the world's largest and most complex OSS development environments; designing and developing OSSs that automate a majority of RBOC operations including planning and engineering, provisioning, and network operations; developing the first Telcordia OSS built on the Operations System Computing Architecture (OSCA) - Bellcore's 3-tier standard OSS architecture; developing one of the first Telcordia OSSs to exploit both UNIX client-server computing and graphical user-interface (GUI) technology leading a complex OSS re-systemization effort at Eircom (Irish Telco); and, most recently, utilizing her extensive telecom

engineering skills for the design of the NMS supporting the Future Combat System (FCS) of the U.S. Army.

Through her work, Michelle has become a respected technology leader and an innovator. Michelle is widely known and well respected throughout Telcordia and its customer community for her breadth of knowledge around telecommunications operations, functional and computing OSS architecture. She is continually called upon to serve as an OSS consultant and is regularly asked to lead proposal and OSS architecture teams. Michelle has a distinguished and sustained record of accomplishments, which has only been matched by her accomplishments in seeding Telcordia with future technical leaders.

John Malyar (2003)
John has been recognized for his many outstanding accomplishments in the areas of operations and network systems. In particular, he was responsible for providing the architectural foundation of the number portability business at Telcordia. John is known as a catalyst for the industry's success in this area and has been called upon by the Cellular Telephone and Internet Association (CTIA), the North American Numbering Council (NANC), and numerous other carriers for his expertise.

John was responsible for creating a Service Order Administration (SOA) solution that allows customers to retain their existing phone numbers when switching wireline carriers. John also participated in standards forums that served to establish Telcordia credibility in the number portability arena, and ensured that the Telcordia solution accurately and rapidly responded to industry need. As a result, more than 90% of the Tier 1 US wireless carrier market has selected the Telcordia WNP Solution, and John is widely considered the WNP industry expert.

Kenneth C. Young, Jr. (2003)
Ken's many accomplishments are in the area of advanced military communications. His sustained work efforts have resulted in winning seven major contracts for Telcordia, including the U.S. Army Research Laboratory (ARL) contract in 2001, where he and his team were charged with performing basic communications research. Ken serves as Program Manager of the ARL consortium, a high-level group of industry and university partners executing a multi-year research program.

Ken's impressive career accomplishments include 57 published technical papers and one issued patent. He has been instrumental in several government communication initiatives, and also has made notable contributions in the areas of ATM interoperability, the FCC Network Reliability Council, the national Gigabit Network research program, and the development of ATM and SONET. Ken is a Senior Member of the Institute of Electrical and Electronics Engineers (IEEE) and teams he's led have been awarded four technical excellence awards by DARPA. He is widely recognized as a technical leader in tactical military communications and has been on the Technical Program committee of IEEE MILCOM since

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1999.

Carolyn Goff (2002)
Carolyn has made significant contributions in OSS integration, functional solution architecture and the practice of software systems development. She is well known throughout the industry as a thought leader in operations. Her early work in automation of local loop provisioning resulted in Operations Support Systems (OSS) that first introduced the concept of "flow through" and are now the core of our existing franchise. Carolyn has also assumed the role of Telcordia ambassador in establishing business with new customers around the world, to whom she continues to bring technological breakthroughs. She has been instrumental in growing our international business in such countries as Australia and Canada.

Matthew Goodman (2002)
Matt's achievements come as a result of his efforts in optical networking. For more than 17 years, he has made significant contributions to Telcordia. Matt was one of the initiators of the company's optical networking and WDM program in the late 1980's. He played a major role in the first multi-wavelength demonstrations, and performed groundbreaking work on both optical network design tools and optical techniques for quantum key distribution. Matt is widely known throughout the industry and academia as both a thought and program leader. He has brought new talent to Telcordia, has attracted funding for research projects, and has created an image of technical excellence that differentiates Telcordia as a leader in its field.

John F. Kimmins (2001)
John has contributed many years of sustained technical excellence and accomplishment. As an energetic advocate for the national telecommunications infrastructure, he has assisted the United States, Telcordia, and Telcordia clients in achieving greater security. He has been the catalyst and lead technical strategist in the development and promulgation of security requirements for network elements, operations systems, data communications networks, and Next-Generation Networks (NGNs). John's strong international reputation in the telecommunications industry is well earned. He produced the first vulnerability analysis of new technologies such as SONET, SMDS and ATM. He continues to bring these insights and knowledge to Internet technologies including Voice Over IP, wireless, and new access technologies such as xDSL.

Will Leland (2001)
Will and several colleagues performed a landmark set of data collection experiments and analysis on traffic in high speed packet networks during the 1990's. He and his fellow colleagues were able to develop a radically new model of data traffic. The work was published in IEEE/ACM Transactions on Networking, and became the founding paper in a new field of traffic analysis known as self-similar traffic analysis. The paper was immediately recognized by the research community and awarded the 1995

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IEEE Communications Society Bennett prize and the 1996 IEEE Baker prize. The Baker prize recognizes the single best paper published in the current year in any IEEE journal, while the Bennett prize recognizes the best paper published in the field of communications. In the last several years, Dr. Leland, in his role as Chief Scientist, has been leading a sweeping transition of the work done in the Internet Architecture Research Laboratory, shifting the work from packet protocol and switch design to packet network management. This has enabled a close alignment of the work in the lab with future product directions for Telcordia.

Will has also made recognized contributions in the fields of distributed computing, broadband service management and digitial rights management. He has been recognized as a senior member by the IEEE.

Nim K. Cheung (2000)
Nim was responsible for developing and managing a portfolio of leading edge government funded research projects with total annual revenue of $20M. He provided technical leadership in high-speed networking research and was an active leader in the IEEE Communications Society. Nim was recognized for his rare combination of technical excellence, managerial talent, organizational commitment, and leadership.

David B. Luber (2000)
Dave has defined and implemented some of the fundamental concepts of telecommunications operations. His early work in outside plant engineering and operations mechanization resulted in Operations Support Systems (OSS) that are the core of our existing franchise (e.g., LEIS). In addition to his personal contributions, he has led teams that have consistently reinvented operations architectures (e.g., IOTP) and launched or redirected new products (e.g., Network Configuration Manager, Customer Access and Location Manager, and Trouble Ticket Manager). Dave is well known throughout the industry as a thought-leader and visionary in operations.

GK Chang (1999)
Well-recognized in the industry for a long history of technical leadership and innovations in the area of wavelength division multiplexing optical networking, GK played a lead role in creating the vision of the Telcordia research program in optical networking. By combining his technical leadership with external visibility, he established and grew major government-funded programs for Telcordia in forward-looking aspects of optical networking. Both aggressive and creative, GK was able to build on government-sponsored work to the commercial advantage of Telcordia. He consistently generated patents during his tenure with the company, and was approached by major suppliers about commercialization opportunities.

G. Ray Ritchie (1999)
Ray was a major contributor to the evolution of digital transmission technologies. He was the first to

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identify the potential advantages and promote the concept of synchronous transmission systems, resulting in the early SYNTRAN standard that was further refined as the SONET standard. He led the formulations for the most widely deployed SONET elements: the Add/Drop Multiplexer and Digital Cross-Connect System. A leader in international standards, Ray initiated the worldwide standardization of the international version of SONET. Toward the end of his career at Telcordia, he was in the forefront of Voice Over IP in Next-Generation Networks.

Siddhartha Dalal (1998)
Sid was recognized for his accomplishments in statistics, where he has contributed to the success of the Y2K Test Data Generation Factory, Spice Process Improvement, ISCP® Testing, and the Efficient Defect Analysis tool.

Dominic Casulli (1998)
Dominic was recognized for his participation on the team that defined the role and architecture for MediaVantage® NCON. He was acknowledged for his support of BellSouth's Operation Systems Transition Architecture team, leadership on the architecture team responsible for developing an ADSL OSS plan for Bell Atlantic, and for providing Operations Systems architecture support for various Satellite System opportunities.

Dariusz Smyk (1998)
Dariusz was recognized for being a consistent leader in the invention and development of breakthrough technology that has sustained our reputation for industry leadership in the Intelligent Network and the Next-Generation Network.

Barbara Reagor (1998) Perceived as a world leader who has made significant contributions in the field of Disaster Prevention and Recovery, Barbara has expanded her role as a leader in the field of Risk Management by achieving international recognition and developing E 9-1-1 Caller ID-ALERT.

Ian Lifchus (1997)
Ian's significant achievements have benefited the telecommunications industry worldwide. They include formulating agreements on open technical standards, as well as organizing internal standards efforts within the company.

Edward Pinnes (1997)
Ed has been recognized for his sustained record of technical and professional excellence in systems engineering and development.

Louis Scerbo (1997)
Lou's accomplishments during his career at Telcordia included launching several new business efforts

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and organizations. He is remembered for his dedication and vision, and for his tireless work in achieving significant growth in sales.

Jules Bellisio (1997)
Jules' contributions to digital telecommunications and broadband services have helped Telcordia establish our reputation for objective technical excellence, and include the invention of a key enabling technology for SONET.

Thomas C. Ely (1996)
As Director for Intelligent Network Solutions, Tom was recognized for consistently leading the invention and development of Advanced Intelligent Network (AIN) technologies. He holds a number of patents and his work on the SPACE® System for AIN service creation garnered the distinguished R&D 100 Award in 1992.

Lanny Smoot (1995)
As one of our most prolific inventors, Lanny made major contributions to the development of the VideoWindow, the Electronic Panning Camera, and the Video On Demand platform. He also led our Collaboratory on Information Infrastructure, and during his tenure with Telcordia was well-respected within the industry for his expertise in this area.

Edward F. Engelbert (1995)
Ed was recognized for outstanding technical achievement including his work in leading edge network Operations Support System solutions and his key contributions in a number of paradigm-shifting technologies. He has trained and inspired some of Telcordia's finest systems engineers.

Stephen M. Walters (1993)
As a Principal in our Professional Services business unit, Steve created profitable solutions for Telcordia customers. Past President and Chairman of the Board for The ATM Forum, he also served on its Board of Directors from 1991 until 1997. Steve was selected one of Network Computing magazine's Technology Drivers for 1995. Network World magazine named him as a 1996 Power Player in networking. Steve was also a Fellow of the IEEE, for his leadership and technical contributions to ATM. He holds 12 patents and received a 1998 CEO Team Award.

Dennis E. Egan (1992)
As Chief Scientist for Information Analysis and Services Research, Dennis was recognized for his group's human-computer interaction studies that led to the design of the SuperBook system, a forerunner of commercial Web browsers. His research group also prototyped advanced technologies embodied in electronic commerce products and operations support systems.

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Fan Chung (1990)
Fan Chung worked in Applied Research in the areas of discrete mathematics, optimization, and operations research, where she was recognized for creating solutions to such problems as network design and secure communications.

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SCHEDULE B

INSTRUCTIONS AND DEFINITIONS

1. The Definitions and Instructions set forth in Schedule B apply as if fully set forth herein.

2. Additionally, the Definitions and Instructions set forth in Lucent's First Request for the Production of Documents and Things to Telcordia apply as if fully set forth herein.

DOCUMENT REQUEST

1. All documents that have been referred to by Telcordia in preparing for this deposition, or that are the source of information that Telcordia expects to provide in response to this Deposition Notice.

CERTIFICATE OF SERVICE

I, Karen E. Keller, Esquire, hereby certify that on August 26, 2005, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Steven J. Balick, Esquire
Ashby & Geddes
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I further certify that on August 12, 2005, I caused a copy of the foregoing document to be served by the manner indicated on the following counsel of record:

BY HAND DELIVERY

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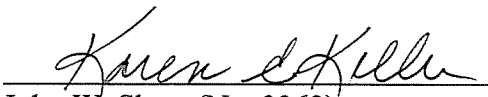

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