ASHBY & GEDDES

ATTORNEYS AND COUNSELLORS AT LAW
222 DELAWARE AVENUE
P. O. BOX 1150
WILMINGTON, DELAWARE 19899

TELEPHONE
302-654-1888

FACSIMILE
302-654-2067

December 13, 2005

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

VIA ELECTRONIC FILING

Re: *Telcordia Technologies, Inc. v. Lucent Technologies, Inc.*
Civil Action No. 04-875-GMS

Dear Judge Sleet:

Plaintiff Telcordia hereby respectfully submits its proposed agenda in the above case, in anticipation of the combined teleconference scheduled at 11:30 a.m. on December 15, 2005 in C.A. Nos. 04-874, 875, and 876-GMS. Telcordia notes that we have not received any proposed text from Lucent, nor have we received any response to our proposed text, and in light of our 48-hour filing deadline we therefore are filing our own proposed agenda letter rather than a joint submission.

**Plaintiff's Issues**

**A. Claim Construction Issue Common to All Cases**

The defendants have not addressed Telcordia's means-plus-function claims during the claim construction process. Telcordia respectfully requests an Order compelling Lucent (and the other defendants) to provide proposed claim constructions for all claims and claim terms asserted by Telcordia prior to the November 17, 2005, deadline for exchanging disputed claim terms.

**B. The Timing and Content of Lucent's Document Production**

(1) Telcordia respectfully requests an Order compelling Lucent to produce, by a date certain, documents relevant to Telcordia's infringement analysis, including hardware specifications for the circuit emulation modules in the CBX-500 and CBX-3500 products, and hardware specifications for the DMX Access Multiplexer product.

(2) Telcordia respectfully requests an Order compelling Lucent to resolve the problems concerning improperly processed and inadvertently produced documents in Lucent's document production.

Respectfully,

*/s/ Steven J. Balick*

Steven J. Balick

SJB/dmf
164556.1

c: John W. Shaw, Esquire (via electronic mail)
Steven C. Cherny, Esquire (via electronic mail)
David A. Nelson, Esquire (via electronic mail)
John Williamson, Esquire (via electronic mail)