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December 14, 2005

BY CM/ECF

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

Re: Telcordia Techs. Inc. v. Lucent Techs., Inc., C.A. No. 04-875-GMS

Dear Judge Sleet:

I write on behalf of defendant Lucent Technologies, Inc. concerning plaintiff's discovery dispute agenda letter (D.I. 67) for this Thursday's teleconference set for 11:30 a.m.

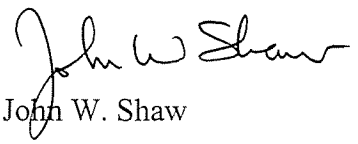
Plaintiff has not met or conferred with Lucent about any of the issues set forth in its agenda letter. Lucent first learned of these issues when Telcordia raised them at 8:00 p.m. in a letter Monday evening and then later that same night as part of its proposed agenda.

Lucent received Plaintiff's proposed agenda letter (attached) Tuesday morning at 1:26 a.m. Not surprisingly we were unable to provide any feedback to plaintiff before the agenda letter was filed. The feedback we ultimately provided was to object to Telcordia's raising issues with the Court before discussing them with Lucent.

Lucent does plan to attend Thursday's teleconference because resolution of a major issue Cisco Systems is raising at the conference – plaintiff's late identification of five new claims – impacts this case as well. We would prefer to meet and confer with Plaintiff to address (and hopefully resolve) the document issues Telcordia included in its agenda. However, should Your

Honor desire to address plaintiff's discovery issues with Lucent at the conference, before we have met and conferred with plaintiff about those issues, we will be prepared to do so.

Respectfully submitted,



John W. Shaw

JWS/prt
cc: Clerk of the Court (by hand delivery and CM/ECF)
Steven J. Balick, Esquire (by CM/ECF)
Don O. Burley, Esquire (by e-mail)
Steven C. Cherny, Esquire (by e-mail)

Shaw, John

From: Williamson, John [John.Williamson@finnegan.com]
Sent: Tuesday, December 13, 2005 1:26 AM
To: sasha.mayergoyz@lw.com
Cc: SBalick; JDay; Shaw, John
Subject: Telcordia v. Lucent
Attachments: 1015665_1.DOC

Sasha,

I have attached a draft joint agenda letter for the hearing scheduled at 11:30 a.m. on December 15, 2005. As this letter is due at 11:30 a.m. on December 13, 2005, please let me and Steve Balick know, as soon as possible, whether Lucent has any issues to add to the agenda and whether Lucent joins in the filing of this letter.

Regards,

John

This e-mail message is intended only for individual(s) to whom it is addressed and may contain information that is privileged, confidential, proprietary, or otherwise exempt from disclosure under applicable law. If you believe you have received this message in error, please advise the sender by return e-mail and delete it from your mailbox. Thank you.

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

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

Dear Judge Sleet:

In preparation for the teleconference scheduled on October 15, 2005, at 11:30 a.m., the parties jointly submit this letter agenda.

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,

John G. Day (I.D. #2403)