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 SECOND NOTICE OF 30(B)(6) DEPOSITION TO PLAINTIFF TELCORDIA TECHNOLOGIES, INC.

PLEASE TAKE NOTICE that on April 4, 2006, 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 Exhibit A hereto.

The deposition will commence at 9:00 A.M. on April 4, 2006, 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.

Respectfully submitted,

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Dated: February 24, 2006

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 "asserted patents" shall mean U.S. Patent Nos. 4,893,306; Re. 36,633; 5,260,978; and 4,835,763.

3. The term "'306 patent" shall mean U.S. Patent No. 4,893,306.

4. The term "'763 patent" shall mean U.S. Patent No. 4,835,763.

5. The term "'633 patent" shall mean U.S. Patent No. Re. 36,633.

6. The term "'978 patent" shall mean U.S. Patent No. 5,260,978.

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

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

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

10. "Cascade" shall mean Cascade Communications Corp.

11. "Ascend" shall mean Ascend Communications, Inc.

12. "Yurie" shall mean Yurie Systems, Inc.

13. "Lucent product" shall mean any product made, used, sold, or offered for sale by Lucent.

14. "Cascade product" shall mean any product made used, sold, or offered for sale by Cascade Communications Corp.

15. "Ascend product" shall mean any product made, used, sold, or offered for sale by Ascend Communications, Inc.

16. "Yurie product" shall mean any product made, used, sold, or offered for sale by Yurie Systems, Inc.

17. The term "aware" shall mean when Telcordia had actual notice that any Lucent products, Cascade products, Ascend products, or Yurie products were allegedly infringing the asserted patents. *See, e.g., Advanced Cardiovascular Sys., Inc., v. Scimed Life Sys., Inc.*, 988 F.2d 1157, 1161 (Fed. Cir. 2003).

CERTIFICATE OF SERVICE

I, Monté T. Squire, hereby certify that on February 24, 2006, a true and correct copy of the foregoing document was electronically filed 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:

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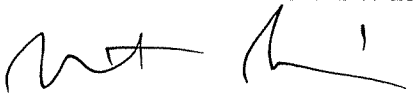
I further certify that I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

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