

EXHIBIT D

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October 20, 2006

VIA EMAIL AND FEDERAL EXPRESS

Adam P. Seitz
Shook, Hardy & Bacon LLP
2555 Grand Boulevard
Kansas City, MO 64108

**Re: *Sprint Communications Company L.P. v. Vonage Holdings Corp.*
and Vonage America, Inc., Case No. 05-2433-JWL**
Our Reference: Y2108-00079
Your Reference: SPRI.116441

Dear Adam,

To date, you have repeatedly failed to address the many deficiencies in Sprint's document production that were raised during our telephone conferences of June 13 and September 13, and in our letters dated September 20 and October 12. This on-going and unexplainable delay is highly prejudicial to Vonage. If we do not hear from you by close of business Monday, October 23, 2006, we will have to assume that Sprint will not be forthcoming with a response or additional documents and will be forced to file a motion to compel in order to obtain the Court's assistance in this matter.

We look forward to your timely reply.

Very truly yours,



Donald R. McPhail

DRM/ego

cc: Peter E. Strand, Esq.
Barry Golob, Esq.

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