

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

SPRINT COMMUNICATIONS COMPANY L.P.,)
)
Plaintiff,)
)
v.)
)
THEGLOBE.COM, INC.,)
VOICEGLO HOLDINGS, INC.,)
VONAGE HOLDINGS CORP.,)
VONAGE AMERICA, INC.,)
)
Defendants.)
_____)

Case No. 05-2433-JWL

**PLAINTIFF SPRINT COMMUNICATIONS COMPANY L.P.'S FIRST SET
OF INTERROGATORIES TO DEFENDANT VONAGE HOLDINGS CORP.**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Sprint Communications Company L.P. ("Sprint") hereby propounds its First Set of Interrogatories to Defendant Vonage Holdings Corp. and requests that they be answered separately, fully, and under oath within thirty (30) days of service pursuant to Rule 33(b)(3) of the Federal Rules of Civil Procedure.

INSTRUCTIONS

1. The following shall apply to all requests:
 - a. The singular of each word shall be construed to include its plural, and vice versa;
 - b. "And" as well as "or" shall be construed both conjunctively as well as disjunctively;
 - c. "Each" shall be construed to include "every," and vice versa;
 - d. "Any" shall be construed to include "all," and vice versa; and
 - e. The present tense shall be construed to include the past tense and vice versa.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each product and/or service that is utilized for providing telephony services, which Vonage Holdings Corp. distributes, sells, uses, markets or offers for sale, wherein any portion of a telephone call is transmitted over both a packet-based network and a circuit-switched network or device (such as the Public Switched Telephone Network or a standard POTS telephone), and describe, in detail, the operation of each such product or service.

RESPONSE:

INTERROGATORY NO. 2: For each product and/or service identified in response to Interrogatory No. 1, identify and describe each component, whether hardware or software, utilized in the provision of such product and/or service and identify the manufacturer, owner, model, and location of all such components.

RESPONSE:

INTERROGATORY NO. 3: Describe, in detail, the date and circumstances under which Vonage Holdings Corp. first learned of the Asserted Patents, including when and how Vonage Holdings Corp. first acquired or requested a copy of the Asserted Patents.

RESPONSE:

INTERROGATORY NO. 4: Describe, in detail, the full factual basis and explanation for Vonage Holdings Corp.'s contention that any alleged acts of infringement have not been willful or intentional.

RESPONSE:

INTERROGATORY NO. 5: Describe, in detail, the full factual basis and explanation for Vonage Holdings Corp.'s contention that Sprint's Asserted Patents are invalid, void and/or unenforceable under one or more sections of Title 35 of the U.S. Code.

RESPONSE:

INTERROGATORY NO. 6: Describe, in detail, the full factual basis and explanation for Vonage Holdings Corp.'s contention that Plaintiff's claim is barred, in whole or in part, by the doctrines of laches, estoppel and unclean hands.

RESPONSE:

INTERROGATORY NO. 7: Describe, in detail, the full factual basis and explanation for Vonage Holdings Corp.'s contention that Vonage Holdings Corp. has not infringed any of the Asserted Patents.

RESPONSE:

INTERROGATORY NO. 8: For each of the products and/or services identified in response to Interrogatory No. 1, identify the number of units sold, the number of subscribers or customers, dollar revenues from sales, gross profits, net profits, actual profits, and projected profits from the sale or distribution of the accused products.

RESPONSE:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PLAINTIFF SPRINT COMMUNICATIONS COMPANY L.P.'S FIRST SET OF INTERROGATORIES TO DEFENDANT VONAGE HOLDINGS CORP. was sent via e-mail and First Class mail, postage prepaid, this 5th day of January, 2006, to:

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