

EXHIBIT L

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November 21, 2006

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Re: *Sprint Communications Company L.P. v. Vonage Holdings Corp. and Vonage America, Inc.*
Case No: 05-2433-JWL
SHB File No: SPRI.116441

Dear Barry and Donald:

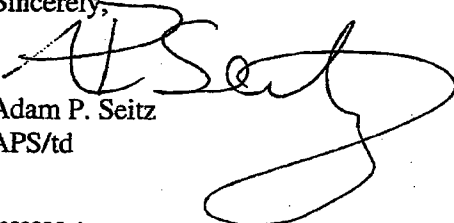
This letter concerns deficiencies in Vonage's discovery responses regarding Vonage's contention that the alleged acts of infringement have not been willful. Though Vonage contends its alleged infringement is not willful or intentional, Vonage has failed to identify any actions or documents in support of this contention. Request No. 4 specifically seeks all documents and things upon which Vonage relies in support of its contention that any alleged acts of infringement have not been willful or intentional. In addition, Interrogatory No. 4 requests the factual basis and explanation for Vonage's contention that any alleged acts of infringement have not been willful or intentional.

Though Vonage promised to produce documents responsive to these requests, no such documents have been produced. Moreover, Vonage's sole response to Interrogatory No. 6 was that it "has taken the necessary actions to investigate Sprint's allegations once the patents were asserted." Vonage, however, has failed to identify the specific "necessary actions" it undertook as the Interrogatory requires. Given these deficiencies, Sprint requests that Vonage supplement its responses no later than December 1, 2006 including, but not limited to, a specific identification of the "necessary actions" undertaken by Vonage.

Additionally, if Vonage is relying on any opinion of counsel in support of its contention that its alleged infringement is not willful, Vonage must supplement its interrogatory response to identify the existence of the opinion and the attorney(s) rendering the opinion no later than December 1, 2006. If Vonage indicates the existence of such an opinion, we request that you produce the opinion no later than December 6, 2006 so that Sprint may have sufficient time in which to conduct discovery relevant to this opinion.

We look forward to receiving your reply.

Sincerely,


Adam P. Seitz
APS/td

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