Case 2:05-cv-02433-JWL

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EXHIBIT H

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

SPRINT COMMUNICATIONS COMPAN	NY L.P.,
Plain	tiff,
v.) Case No. 05-2433-JWL
THE GLOBE.COM, INC., VOICEGLO HOLDINGS, INC. VONAGE HOLDINGS CORP., and VONAGE AMERICA, INC.))))
Defer	odants.)

DEFENDANT VONAGE HOLDINGS CORP.'S FIRST SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES

Defendant Vonage Holdings Corp. ("Vonage") submits the following First Supplemental Objections and Responses to Interrogatory No. 4 and No. 7 of Plaintiff Sprint Communications Company LP's ("Sprint") First Set of Interrogatories.

GENERAL OBJECTIONS

1. Vonage objects generally to each Interrogatory within Sprint's First Set of Interrogatories as unduly burdensome insofar as it seeks the disclosure of information that will become known to Vonage only after the completion of discovery, or is otherwise premature, particularly because Sprint has not provided specific constructions of its asserted claims, or even a list of terms to be construed, nor the support for such claim constructions, nor has Sprint provided updated statements regarding how Vonage's accused products and/or services may infringe one or more of the patents-in-suit.

- 2. Vonage objects generally to each Interrogatory within Sprint's First Set of Interrogatories insofar as it causes annoyance, oppression, undue burden, and/or expense to Vonage, particularly because Sprint has not provided specific constructions of its asserted claims, or even a list of terms to be construed, nor the support for such claim constructions, nor has Sprint provided updated statements regarding how Vonage's accused products and/or services may infringe one or more of the patents-in-suit.
- 3. Vonage objects generally to each Interrogatory within Sprint's First Set of Interrogatories insofar as it seeks information not reasonably calculated to lead to the discovery of admissible evidence and/or which exceeds the scope of discovery permitted by the Federal Rules of Civil Procedure.
- 4. Vonage objects generally to each Interrogatory within Sprint's First Set of Interrogatories insofar as it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine and/or any other applicable privilege or immunity.
- 5. Vonage objects generally to each Interrogatory within Sprint's First Set of Interrogatories insofar as it seeks work product, mental impressions, conclusions, opinions and/or legal theories of Vonage's counsel, experts and/or consultants developed in connection with or in anticipation of this or any other litigation or other business transaction not related to this lawsuit.
- 6. Vonage objects to the definitions of the terms "Vonage", "you" and "your" in Sprint's First Set of Interrogatories to the extent that those definitions

encompass entities that are not within the control of Vonage and/or encompass documents and information that are not within Vonage's possession, custody or control.

- Vonage objects generally to each Interrogatory within Sprint's First Set of 7. Interrogatories insofar as it seeks a response from Vonage on behalf of an entity not wholly owned or controlled by Vonage or with regard to a service or product not sold, manufactured and/or used by Vonage.
- Vonage objects generally to each Interrogatory within Sprint's First Set of 8. Interrogatories as vague, overbroad and unduly burdensome insofar as it seeks information regarding products and/or services sold and/or used by Vonage, but which Sprint has not accused of infringing any claim of any patent-in-suit.
- 9. Vonage objects generally to Sprint's First Set of Interrogatories as premature because Vonage has outstanding discovery requests to Sprint asking for a construction of any claim Sprint alleges is infringed, but that Sprint has not yet fully answered.
- 10. Vonage objects generally to each Interrogatory within Sprint's First Set of Interrogatories to the extent it seeks discovery or information or identification of documents that are a matter of public record, or otherwise equally accessible to all parties.
- 11. Vonage incorporates each of its General Objections with regard to each Interrogatory within Sprint's First Set of Interrogatories as though fully set forth therein.

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 4:

Describe, in detail, the full factual basis and explanation for Vonage Holdings Corp.'s contention that any acts of infringement have not been willful or intentional.

VONAGE'S FIRST SUPPLEMENTAL RESPONSE:

This First Supplemental Response supplements and does not supplant, displace or replace Vonage's Response to Interrogatory No. 4. Moreover, Vonage's Response to Interrogatory No. 4 is incorporated by reference into the First Supplemental Response.

Subject to and without waiving any of Vonage's general and specific objections, Vonage states that, based on the apparent construction of the claims in Sprint's First Amended Infringement Contentions, no Vonage product or service infringes any Asserted Claim of any Asserted Patent, either literally or under the doctrine of equivalents, for at least the reasons shown in the attached Exhibit A. Vonage further states that because there is no infringement of any claim, either literally or under the doctrine of equivalents, there can be no issue of willfulness or intentional infringement.

INTERROGATORY NO. 7:

Describe, in detail, the full factual basis and explanation for Vonage Holdings Corp.'s contention that Vonage Holding's Corp. has not infringed any of the Asserted Patents.

VONAGE'S FIRST SUPPLEMENTAL RESPONSE:

This First Supplemental Response supplements and does not supplant, displace or replace Vonage's Response to Interrogatory No. 7. Moreover, Vonage's Response to Interrogatory No. 7 is incorporated by reference into the First Supplemental Response.

Subject to and without waiving any of Vonage's general and specific objections, Vonage states that, based on the apparent construction of the claims in Sprint's First Amended Infringement Contentions, no Vonage product or service infringes any independent Asserted Claim of any Asserted Patent, either literally or under the doctrine of equivalents, for at least the reasons shown in the attached Exhibit A. Vonage further states that no product or service infringes any dependent Assert Claim of any Asserted Patent, either literally or under the doctrine of equivalents, for at least the same reasons as the claims from which they depend are not infringed, literally or under the doctrine of equivalents.

Respectfully submitted,

/s/ Donald R. McPhail

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Attorneys for Defendants/Counterclaim Plaintiff Vonage America, Inc. and Vonage Holdings Corp.

Dated: November 14, 2006

CERTIFICATE OF SERVICE

I hereby certify on this 29th day of December, 2006 that a copy of DEFENDANT VONAGE HOLDINGS CORP.'S FIRST SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES was served by email and First Class Mail, with notice of case activity to be generated and sent electronically by the Clerk of the Court to:

B. Trent Webb Adam P. Seitz Erick A. Buresh SHOOK, HARDY & ;BACON LLP 2555 Grand Boulevard Kansas City, MO 64108-2613 Fax: (816) 421-5547 ATTORNEYS FOR PLAINTIFF

Respectfully submitted,

/s/ Donald R. McPhail

EXHIBIT A

U.S. Patent No. 6,665,294 - Independent Claim 1

U.S. Patent No. 6,665,294	Vonage's Contentions
A telecommunication signal embodied in a tangible medium, the telecommunication signal comprising:	Vonage's network does not include "a telecommunication signal embodied in a tangible medium" as those terms are used in the '294 patent.
a first signal component including user information from a narrowband communication signal; and	Vonage's network does not include "a telecommunication signal embodied in a tangible medium" that comprises "a first signal component including user information from a narrowband communication signal" as those terms are used in the '294 patent.
a second signal component including an identifier for routing the user information, wherein the identifier is selected by processing a signaling message, wherein an interworking device receives the narrowband communication signal and a control signal indicating the narrowband communication signal and the identifier, and in response to the control signal, converts the narrowband communication signal into a packet format having the first signal component including the user information and the second signal component including the identifier to form the telecommunication signal.	Vonage's network does not include "a telecommunication signal embodied in a tangible medium" that comprises "a second signal component including an identifier for routing the user information" as those terms are used in the '294 patent.

U.S. Patent No. 6,665,294 - Independent Claim 10

U.S. Patent No. 6,665,294	Vonage's Contentions
10. A control signal embodied in a tangible medium, the control signal comprising:	Vonage's network does not include "a control signal embodied in a tangible medium" as those terms are used in the '294 patent.
a first signal component indicating a narrowband communication signal having user information; and	Vonage's network does not include "a control signal embodied in a tangible medium" that comprises "a first signal component indicating a narrowband communication signal having user information" as those terms are used in the '294 patent.
a second signal component indicating an identifier for routing the user information, wherein the identifier is selected by processing a signaling message, wherein an interworking device receives the narrowband communication signal and the control signal indicating the narrowband communication signal and the identifier, and in response to the control signal, converts the narrowband communication signal into a packet format having the user	Vonage's network does not include "a control signal embodied in a tangible medium" that comprises "a second signal component indicating an identifier for routing the user information" as those terms are used in the '294 patent.

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	information and the identifier to form a telecommunication	
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U.S. Patent No. 6,665,294 - Independent Claim 19

U.S. Patent No. 6,665,294	Vonage's Contentions
19. A method of transferring a telecommunication signal, the method comprising:	The operation of Vonage's network does not involve "transferring a telecommunication signal" as those terms are used in the '294 patent.
transferring a first signal component including user information from a narrowband communication signal; and	The operation of Vonage's network does not involve "transferring a first signal component including user information from a narrowband communication signal" as those terms are used in the '294 patent.
transferring a second signal component including an identifier for routing the user information, wherein the identifier is selected by processing a signaling message, wherein an interworking device receives the narrowband communication signal and a control signal indicating the narrowband communication signal and the identifier, and in response to the control signal, converts the narrowband communication signal into a packet format having the first signal component including the user information and the second signal component including the identifier to form the telecommunication signal.	The operation of Vonage's network does not involve "transferring a second signal component including an identifier for routing the user information" as those terms are used in the '294 patent.

U.S. Patent No. 6,665,294 – Independent Claim 28

U.S. Patent No. 6,665,294	Vonage's Contentions
28. A method of transferring a control signal, the method comprising:	The operation of Vonage's network does not involve "transferring a control signal" as those terms are used in the '294 patent.
transferring a first signal component indicating a narrowband communication signal having user information; and	The operation of Vonage's network does not involve "transferring a first signal component indicating a narrowband communication signal having user information" as those terms are used in the '294 patent.
transferring a second signal component indicating an identifier for routing the user information, wherein the identifier is selected by processing a signaling message, wherein an interworking device receives the narrowband communication signal and the control signal indicating the narrowband communication signal and the identifier, and in response to the control signal, converts the narrowband communication signal into a packet format having the user information and the identifier to form a telecommunication signal.	The operation of Vonage's network does not involve "transferring a second signal component indicating an identifier for routing the user information" as those terms are used in the '294 patent.

U.S. Patent No. 6,298,064	Vonage's Contentions
1. A communication method for a call comprising:	The operation of Vonage's network does not involve a "communication method for a call" as those terms are used in the '064 patent.
receiving set-up signaling associated with the call into a processing system;	The operation of Vonage's network does not involve "receiving set-up signaling associated with the call into a processing system" as those terms are used in the '064 patent.
processing the set-up signaling in the processing system to select a DS0 connection;	The operation of Vonage's network does not involve "processing the set-up signaling in the processing system to select a DS0 connection" as those terms are used in the '064 patent.
generating a message identifying the DS0 connection;	The operation of Vonage's network does not involve "generating a message identifying the DS0 connection" as those terms are used in the '064 patent.
transmitting the message from the processing system;	The operation of Vonage's network does not involve "transmitting the message from the processing system" as those terms are used in the '064 patent.
receiving the message and an asynchronous communication associated with the call into an interworking unit;	The operation of Vonage's network does not involve "receiving the message and an asynchronous communication associated with the call into an interworking unit" as those terms are used in the '064 patent.
in the interworking unit, converting the asynchronous communication into a user communication; and	The operation of Vonage's network does not involve "converting the asynchronous communication into a user communication" in an "interworking unit" as those terms are used in the '064 patent.
transferring the user communication from the interworking unit to the DS0 connection in response to the message.	The operation of Vonage's network does not involve "transferring the user communication from the interworking unit to the DS0 connection in response to the message" as those terms are used in the '064 patent.

U.S. Patent No. 6,298,064 - Independent Claim 35

U.S. Patent No. 6,298,064	Vonage's Contentions
35. A communication system for a call comprising:	Vonage's network does not include a "communication system for a call" as those terms are used in the '064 patent.
a processing system configured to receive setup signaling	Vonage's network does not include "a processing

associated with the call, process the set-up signaling to select a DS0 connection, generate a message identifying the DS0 connection, and transfer the message; and	system configured to receive setup signaling associated with the call, process the set-up signaling to select a DS0 connection, generate a message identifying the DS0 connection, and transfer the message" as those terms are used in the '064 patent.
an interworking unit configured to receive the message and an asynchronous communication for the call, convert the asynchronous communication into a user communication, and transfer the user communication to the DS0 connection in response to the message.	Vonage's network does not include "an interworking unit configured to receive the message and an asynchronous communication for the call, convert the asynchronous communication into a user communication, and transfer the user communication to the DS0 connection in response to the message" as those terms are used in the '064 patent.

U.S. Patent No. 6,473,429 – Independent Claim 1

U.S. Patent No. 6,473,429	Vonage's Contentions
1. A communication method comprising:	The operation of Vonage's network does not involve a "communication method" as that term is used in the '429 patent.
receiving information associated with a user communication into a processing system;	The operation of Vonage's network does not involve "receiving information associated with a user communication into a processing system" as those terms are used in the '429 patent.
processing the information in the processing system to select an identifier;	The operation of Vonage's network does not involve "processing the information in the processing system to select an identifier" as those terms are used in the '429 patent.
generating a message containing the identifier;	The operation of Vonage's network does not involve "generating a message containing the identifier" as those terms are used in the '429 patent.
transmitting the message from the processing system;	The operation of Vonage's network does not involve "transmitting the message from the processing system" as those terms are used in the '429 patent.
receiving the message into an interworking unit;	The operation of Vonage's network does not involve "receiving the message into an interworking unit" as those terms are used in the '429 patent.
receiving the user communication into the interworking unit from a DS0 connection;	The operation of Vonage's network does not involve "receiving the user communication into the interworking unit from a DS0 connection" as those terms are used in the '429 patent.
in the interworking unit, converting the user communication into an asynchronous communication with the identifier in a header in response to the message; and	The operation of Vonage's network does not involve "converting the user communication into an asynchronous communication with the identifier in a header in response to the message" in "the interworking unit" as those terms are used in the '429 patent.
transferring the asynchronous communication from the interworking unit.	The operation of Vonage's network does not involve "transferring the asynchronous communication from the interworking unit" as those terms are used in the '429 patent.

U.S. Patent No. 6,473,429 – Independent Claim 23

U.S. Patent No. 6,473,429	Vonage's Contentions
23. A communication system comprising:	Vonage's network does not include a "communication system" as that term is used in the

	'429 patent.
a processing system configured to receive information related to a user communication, process the information to select an identifier, generate a message containing the identifier, and transmit the message; and	Vonage's network does not include "a processing system configured to receive information related to a user communication, process the information to select an identifier, generate a message containing the identifier, and transmit the message" as those terms are used in the '429 patent.
an interworking unit configured to receive the message, receive the user communication from a DS0 connection, convert the user communication into an asynchronous communication with the identifier in a header in response to the message, and transfer the asynchronous communication.	Vonage's network does not include "an interworking unit configured to receive the message, receive the user communication from a DS0 connection, convert the user communication into an asynchronous communication with the identifier in a header in response to the message, and transfer the asynchronous communication" as those terms are used in the '429 patent.

U.S. Patent No. 6,304,572 - Independent Claim 1

U.S. Patent No. 6,304,572	Vonage's Contentions
A method for processing telecommunications signaling that comprises:	The operation of Vonage's network does not involve "processing telecommunications signaling" as those terms are used in the '572 patent.
(a) receiving in-band telecommunications signaling into a first telecommunications device coupled to a first connection;	The operation of Vonage's network does not involve "receiving in-band telecommunications signaling into a first telecommunications device coupled to a first connection" as those terms are used in the '572 patent.
(b) in the first telecommunications device, converting the in-band telecommunications signaling to an out-of-band telecommunications signaling message;	The operation of Vonage's network does not involve "converting the in-band telecommunications signaling to an out-of-band telecommunications signaling message" in "the first telecommunications device" as those terms are used in the '572 patent.
(c) routing the out-of-band telecommunications signaling message from the first telecommunications device to a processor that is external to the first telecommunications device and a second communication device;	The operation of Vonage's network does not involve "routing the out-of-band telecommunications signaling message from the first telecommunications device to a processor that is external to the first telecommunications device and a second communication device" as those terms are used in the '572 patent.
(d) processing the out-of-band telecommunications signaling message in the processor to select a second connection coupled to the first telecommunications device and to the second telecommunications device;	The operation of Vonage's network does not involve "processing the out-of-band telecommunications signaling message in the processor to select a second connection coupled to the first telecommunications device and to the second telecommunications device" as those terms are used in the '572 patent.
(e) generating a first control message and a second control message indicating the second connection;	The operation of Vonage's network does not involve "generating a first control message and a second control message indicating the second connection" as those terms are used in the '572 patent.
(f) transmitting the first control message from the processor to the first telecommunications device and transmitting the second control message from the processor to the second telecommunications device; and	The operation of Vonage's network does not involve "transmitting the first control message from the processor to the first telecommunications device and transmitting the second control message from the processor to the second telecommunications device" as those terms are used in the '572 patent.
(g) in the first telecommunications device, receiving the first control message and coupling the first connection to the second connection in response to the first control message.	The operation of Vonage's network does not involve "receiving the first control message and coupling the first connection to the second connection in response to the first control message" in "the first telecommunications device" as those terms are used in the '572 patent.

U.S. Patent No. 6,304,572	Vonage's Contentions
38. A system for processing telecommunications is [sic] signaling that comprises:	Vonage's network does not include a "system for processing telecommunications is signaling" as those terms are used in the '572 patent.
a first telecommunications device coupled to a first connection and a second connection and configured to receive in-band telecommunications signaling, to convert the in-band telecommunications signaling to an out-of-band telecommunications signaling message and to transmit the out-of-band telecommunications signaling message, to receive a first control message, and to couple the first connection to the second connection in response to the first control message; and	Vonage's network does not include "a first telecommunications device coupled to a first connection and a second connection and configured to receive in-band telecommunications signaling, to convert the in-band telecommunications signaling to an out-of-band telecommunications signaling message and to transmit the out-of-band telecommunications signaling message, to receive a first control message, and to couple the first connection to the second connection in response to the first control message" as those terms are used in the '572 patent.
a processor that is external to the first telecommunications device and a second telecommunications device and configured to receive the out-of-band telecommunications signaling message from the first telecommunications device and to process the out-of-band telecommunications signaling message to select the second connection, to generate the first control message and a second control message that indicate the second connection, and to transmit the first control message to the first telecommunications device and to transmit the second control message to a second telecommunications device.	Vonage's network does not include "a processor that is external to the first telecommunications device and a second telecommunications device and configured to receive the out-of-band telecommunications signaling message from the first telecommunications device and to process the out-of-band telecommunications signaling message to select the second connection, to generate the first control message and a second control message that indicate the second connection, and to transmit the first control message to the first telecommunications device and to transmit the second control message to a second telecommunications device" as those terms are used in the '572 patent.

U.S. Patent No. 6,633,561 – Independent Claim 1

U.S. Patent No. 6,633,561	Vonage's Contentions
1. A method of operating a processing system to control a packet communication system for a user communication, the method comprising:	The operation of Vonage's network does not involve "operating a processing system to control a packet communication system for a user communication" as those terms are used in the '561 patent.
receiving a signaling message for the user communication from a narrowband communication system into the processing system;	The operation of Vonage's network does not involve "receiving a signaling message for the user communication from a narrowband communication system into the processing system" as those terms are used in the '561 patent.
processing the signaling message to select a network code that identifies a network element to provide egress from the packet communication system for the user communication;	The operation of Vonage's network does not involve "processing the signaling message to select a network code that identifies a network element to provide egress from the packet communication system for the user communication" as those terms are used in the '561 patent.
generating a control message indicating the network code;	The operation of Vonage's network does not involve "generating a control message indicating the network code" as those terms are used in the '561 patent.
transferring the control message from the processing system to the packet communication system	The operation of Vonage's network does not involve "transferring the control message from the processing system to the packet communication system" as those terms are used in the '561 patent.
receiving the user communication in the packet communication system and using the network code to route the user communication through the packet communication system to the network element; and	The operation of Vonage's network does not involve "receiving the user communication in the packet communication system and using the network code to route the user communication through the packet communication system to the network element" as those terms are used in the '561 patent.
transferring the user communication from the network element to provide egress from the packet communication system.	The operation of Vonage's network does not involve "transferring the user communication from the network element to provide egress from the packet communication system" as those terms are used in the '561 patent.

U.S. Patent No. 6,633,561 – Independent Claim 24

U.S. Patent No. 6,633,561	Vonage's Contentions
packet communication system for a user communication, the method comprising:	The operation of Vonage's network does not involve "operating a processing system to control a packet communication system for a user communication" as those terms are used in the '561 patent.

selecting a network code that identifies a network element to provide egress for the user communication from the packet communication system to a narrowband communication system;	The operation of Vonage's network does not involve "selecting a network code that identifies a network element to provide egress for the user communication from the packet communication system to a narrowband communication system" as those terms are used in the '561 patent.
generating a control message indicating the network code and transferring the control message from the processing system to the packet communication system; and	The operation of Vonage's network does not involve "generating a control message indicating the network code and transferring the control message from the processing system to the packet communication system" as those terms are used in the '561 patent.
generating a signaling message for the user communication and transferring the signaling message from the processing system to the narrowband communication system;	The operation of Vonage's network does not involve "generating a signaling message for the user communication and transferring the signaling message from the processing system to the narrowband communication system" as those terms are used in the '561 patent.
receiving the user communication in the packet communication system and using the network code to route the user communication through the packet communication system to the network element; and	The operation of Vonage's network does not involve "receiving the user communication in the packet communication system and using the network code to route the user communication through the packet communication system to the network element" as those terms are used in the '561 patent.
transferring the user communication from the network element to the narrowband communication system to provide egress from the packet communication system.	The operation of Vonage's network does not involve "transferring the user communication from the network element to the narrowband communication system to provide egress from the packet communication system" as those terms are used in the '561 patent.

U.S. Patent No. 6,463,052 - Independent Claim 1

U.S. Patent No. 6,463,052	Vonage's Contentions
A method of transferring a user communication to a packet communication system, the method comprising:	The operation of Vonage's network does not involve "transferring a user communication to a packet communication system" as those terms are used in the '052 patent.
receiving the user communication into a device;	The operation of Vonage's network does not involve "receiving the user communication into a device" as those terms are used in the '052 patent.
receiving signaling formatted for a narrowband system into a processing system;	The operation of Vonage's network does not involve "receiving signaling formatted for a narrowband system into a processing system" as those terms are used in the '052 patent.
in the processing system, processing the signaling to select a network code that identifies a network element to provide egress for the user communication from the packet communication system;	The operation of Vonage's network does not involve "processing the signaling to select a network code that identifies a network element to provide egress for the user communication from the packet communication system" in "the processing system" as those terms are used in the '052 patent.
transferring an instruction indicating the network code from the processing system to the device; and	The operation of Vonage's network does not involve "transferring an instruction indicating the network code from the processing system to the device" as those terms are used in the '052 patent.
transferring a packet including the network code and the user communication from the device to the packet communication system in response to the instruction.	The operation of Vonage's network does not involve "transferring a packet including the network code and the user communication from the device to the packet communication system in response to the instruction" as those terms are used in the '052 patent.

U.S. Patent No. 6,452,932	Vonage's Contentions
1. A method for handling a call having a first message and communications, the method comprising:	The operation of Vonage's network does not involve "handling a call having a first message and communications" as those terms are used in the '932 patent.
receiving and processing the first message in a processing system external to narrowband switches to select one of the narrowband switches;	The operation of Vonage's network does not involve "receiving and processing the first message in a processing system external to narrowband switches to select one of the narrowband switches" as those terms are used in the '932 patent.
generating a second message in the processing system based on the selected narrowband switch and transmitting the second message from the processing system; and	The operation of Vonage's network does not involve "generating a second message in the processing system based on the selected narrowband switch and transmitting the second message from the processing system" as those terms are used in the '932 patent.
receiving the second message and the communications in an asynchronous communication system and transferring the communications to the selected narrowband switch in response to the second message.	The operation of Vonage's network does not involve "receiving the second message and the communications in an asynchronous communication system and transferring the communications to the selected narrowband switch in response to the second message" as those terms are used in the '932 patent.

U.S. Patent No. 6,452,932 – Independent Claim 18

U.S. Patent No. 6,452,932	Vonage's Contentions
18. A communications system for handling a call having a first message and communications, the communication system comprising:	Vonage's network does not include a "communications system for handling a call having a first message and communications" as those terms are used in the '932 patent.
a processing system external to narrowband switches and configured to receive and process the first message to select one of the narrowband switches and to generate and transmit a second message based on the selected narrowband switch; and	Vonage's network does not include "a processing system external to narrowband switches and configured to receive and process the first message to select one of the narrowband switches and to generate and transmit a second message based on the selected narrowband switch" as those terms are used in the '932 patent.
an asynchronous communication system configured to receive the second message and the communications and transfer the communications to the selected narrowband switch in response to the second message.	Vonage's network does not include "an asynchronous communication system configured to receive the second message and the communications and transfer the communications to the selected narrowband switch in response to the second message" as those terms are used in the '932 patent.