Document 110-10

Filed 01/18/2007

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## EXHIBIT I

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January 8, 2007

## Robert H. Reckers

2555 Grand Blvd. Kansas City Missouri 64108-2613 816.474.6550 816.421.5547 Fax

## **SENT VIA E-MAIL**

Mr. Donald R. McPhail Duane Morris LLP 1667 K Street, NW, Suite 700 Washington, DC 20006-1608

Re: Sprint Communications Company L.P. v. Vonage Holdings Corp., et al.

Case No: 05-2433-JWL SHB File No: SPRI.116441

Dear Don:

We are in receipt of your supplemental responses to Sprint's Interrogatory Nos. 4 and 7. Your responses, however, remain deficient.

Your supplemental response to Interrogatory No. 7 is nothing more than a recitation of the language of the asserted claims. This response does not provide even the slightest indication of the basis for Vonage's contention that its does not infringe the claims of Sprint's patents, which is plainly required by the Interrogatory. Sprint is entitled to Vonage's affirmative contentions in this regard. Further, Vonage's response does not provide any information about the operation of Vonage's network and how Vonage contends such operation differs from Sprint's claimed systems and methods. Moreover, your December 7, 2006 letter stated that Vonage had produced technical documents detailing the operation of its system, as well as allegedly providing an explanation of why Vonage's system does not infringe the Sprint patents. Your most recent supplementation fails to identify the Bates range for any of these documents.

As Vonage's supplemental response to Interrogatory No. 7 fails to convey any meaningful information to Sprint, Sprint requests that Vonage provide <u>responsive and substantive answers</u> to Interrogatory No. 7, including an identification, by Bates number, of the documents you contend support your contention, no later than January 15, 2007.

As to your supplemental response to Interrogatory No. 4, your response fails to address the deficiencies noted in Mr. Seitz's November 21, 2006 letter. In the November 21 letter, Mr. Seitz requested that you specifically describe the "necessary actions" undertaken by Vonage. Your response is nothing more than your contention that Vonage does not infringe, which is a wholly inadequate response to the Interrogatory. Accordingly, we request that you supplement your response to Interrogatory No. 4 and

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provide us with the information requested in Mr. Seitz's November 21 letter no later than January 15, 2007.

Mr. Donald R. McPhail January 8, 2007 Page 2

We look forward to receiving your reply.

Sincerely,

Robert H. Recker

Case 2:05-cv-02433-JWL

RHR

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