

# **EXHIBIT B**

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  
REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS TO  
VONAGE AMERICA, INC.**

Plaintiff Sprint Communications Company L.P. ("Sprint") hereby propounds its First Set of Requests for the Production of Documents and Things to Defendant Vonage America, Inc. pursuant to Rule 34 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.

REQUEST NO. 32: All documents in the possession, custody or control of Vonage America, Inc. that refer or relate to Sprint and/or the Asserted Patents.

RESPONSE:

REQUEST NO. 33: All documents that relate to or constitute notice to Vonage America, Inc. of the Asserted Patents, including, but not limited to, documents sufficient to show when Vonage America, Inc. first became aware of the Asserted Patents.

RESPONSE:

REQUEST NO. 34: All documents in the possession, custody, or control of Vonage America, Inc. which record, relate to, or refer to any communication with any supplier of any of the products or services identified in response to Interrogatory No. 1 which record, relate to, or refer to the Asserted Patents.

RESPONSE:

REQUEST NO. 35: All documents in the possession, custody or control of Vonage America, Inc. which record, relate to, or refer to any communication with any supplier of any of the components, whether hardware or software, identified in response to Interrogatory No. 2 which record, relate to or refer to the Asserted Patents.

RESPONSE:

REQUEST NO. 45: Documents sufficient to identify any modification, alteration, or revision of the design, construction, performance or architecture of any of the components, whether hardware or software, identified in response to Interrogatory No. 2.

RESPONSE:

REQUEST NO. 46: All documents relating to Vonage America, Inc.'s decision to make, use, sell, offer to sell, license, or offer to license any of the products or services identified in response to Interrogatory No. 1.

RESPONSE:

REQUEST NO. 47: All documents relating to Vonage America, Inc.'s decision to make, use, sell, offer to sell, license, or offer to license any of the components, whether hardware or software, identified in response to Interrogatory No. 2.

RESPONSE:

REQUEST NO. 48: All documents relating to any correspondence by Vonage America, Inc. with anyone regarding the Asserted Patents.

RESPONSE:

REQUEST NO. 49: All documents relating to any communication between Vonage America, Inc., or anyone acting on its behalf, and any customer, field representative,

Dated: January 5, 2006

/s/ Adam P. Seitz

B. Trent Webb, KS Bar No. 15965  
Eric A. Buresh, KS Bar No. 19895  
Adam P. Seitz, KS Bar No. 21059  
SHOOK, HARDY & BACON L.L.P.  
2555 Grand Boulevard  
Kansas City, Missouri 64108-2613  
(816) 474-6550 Telephone  
(816) 421-5547 Facsimile

Attorneys for Plaintiff  
SPRINT COMMUNICATIONS COMPANY  
L.P.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of January, 2006, a true and accurate copy of the above and foregoing PLAINTIFF SPRINT COMMUNICATIONS COMPANY L.P.'S FIRST SET OF REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS TO VONAGE AMERICA, INC. were sent via e-mail and First Class mail, postage prepaid, to:

James D. Oliver  
Scott C. Nehrbass  
Foulston Siefkin LLP  
40 Corporate Woods Suite 1050  
9401 Indian Creek Parkway  
Overland Park, Kansas 66210

James W. Dabney  
Henry C. Lebowitz  
Malcolm J. Duncan  
Fried, Frank, Harris, Shriver & Jacobson LLP  
One New York Plaza  
New York, New York 10004  
Attorneys for Defendants  
Theglobe.com, Inc. and Voiceglo Holdings, Inc.

Don R. Lolli  
Patrick J. Kaine  
Dysart Taylor Lay Cotter & McMonigle P.C.  
4420 Madison Avenue  
Kansas City, Missouri 64111

Patrick D. McPherson  
Patrick C. Muldoon  
Barry Golob  
Duane Morris LLP  
1667 K. Street N.W.  
Washington, DC 20006-1608

Attorneys for Defendants  
Vonage Holdings Corp. and  
Vonage America, Inc.

/s/ Adam P. Seitz  
Adam P. Seitz  
Attorneys for Sprint Communications Company L.P.