

EXHIBIT B

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March 7, 2007

VIA EMAIL

Jason R. Mudd
Shook, Hardy & Bacon LLP
2555 Grand Boulevard
Kansas City, MO 64108

Re: *Sprint Communications Company L.P. v. Vonage Holdings Corp.
and Vonage America, Inc., Case No. 05-2433-JWL*
Our Reference: Y2108-00079
Your Reference: SPRI.116441

Dear Jason,

This letter is in response to your letter dated March 5, 2007, regarding Vonage’s privilege log and document production.

In the past week, you have sent me at least four letters demanding additional documents, Mr. Strand has sent letters demanding additional documents, Mr. Seitz has sent letters demanding additional documents and Sprint has filed a motion to compel production of still more documents. We therefore find it somewhat surprising that you are “absolutely shocked” that we would suggest Vonage has not completed its document production. While we may have considered Vonage’s document production to be substantially complete in the past, in view your continuous demands for additional documents, we can no longer say that Vonage will not be producing more documents in the future. Nor can we say that Vonage will be producing more documents in the future – although such is likely, any additional production will depend upon the results of the searches being performed in response to Sprint’s many letters. We will, however, represent that Vonage will complete its production of documents on or before March 30, 2007, the date set in the Court’s scheduling orders. We will also produce a complete privilege log on or before March 30, 2007.

Finally, your allegation that “Vonage has woefully neglected its duties under the Federal Rules” is, frankly, laughable in view of the fact that Vonage has produced nearly 700,000 pages of documents to Sprint – almost twice the number Sprint has produced to Vonage. Baseless accusations of misconduct will not be tolerated in the future.

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If you have any questions, or would like to discuss this further, please do not hesitate to contact me.

Very truly yours,



Donald R. McPhail

DRM/ego