

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS**

|                                     |   |                      |
|-------------------------------------|---|----------------------|
| _____                               | ) |                      |
| SPRINT COMMUNICATIONS COMPANY L.P., | ) |                      |
|                                     | ) |                      |
| Plaintiff,                          | ) |                      |
|                                     | ) | Case No. 05-2433-JWL |
| v.                                  | ) |                      |
|                                     | ) |                      |
| VONAGE HOLDINGS CORP. and           | ) |                      |
| VONAGE AMERICA, INC.,               | ) |                      |
|                                     | ) |                      |
| Defendants.                         | ) |                      |
| _____                               | ) |                      |

**VONAGE HOLDINGS CORP. AND VONAGE AMERICA, INC.’S  
MOTION TO COMPEL PRODUCTION OF  
DOCUMENTS OF JOSEPH MICHAEL CHRISTIE**

Defendants Vonage Holdings Corp. and Vonage America, Inc. (collectively “Vonage”), by their attorneys, hereby move this Court for an Order pursuant to Federal Rule of Civil Procedure 37(a) compelling Plaintiff Sprint Communications Company, L.P. (“Sprint”) to produce documents of the purported inventor of the patents at issue, Joseph Michael Christie, sought by Vonage since the inception of discovery but only identified by Sprint at the recent deposition of its employee, Michael Gardner.

In support of its motion, Vonage relies on the points of fact and law in the accompanying memorandum, which it incorporates herein by reference. As required by Local Rule 37.1, copies

of Vonage's Requests for Production of Documents, and Sprint's responses thereto, also accompany this Motion.

Pursuant to Local Civil Rule 37.2, Counsel for Vonage America, Inc. and Vonage Holdings Corp. certifies that they have conferred with counsel for Sprint Communications Co., L.P. in a good faith attempt to resolve the issue presented in this motion, as described in the accompanying memorandum.

Respectfully submitted,

March 30, 2007

/s/ Patrick J. Kaine

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

**CERTIFICATE OF SERVICE**

I hereby certify on March 30, 2007, that a copy of Vonage Holdings Corp. and Vonage America, Inc.'s Motion to Compel Production of Documents, and supporting papers, was filed electronically, with a notice of case activity to be generated and sent electronically by the Clerk of Court to:

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/s/ Donald R. McPhail