

**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 TESTIMONY IN RESPONSE TO THEIR SECOND
NOTICE OF DEPOSITION PURSUANT TO FED. R. CIV. P. 30(b)(6)**

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 testimony in response to Vonage’s Second Notice of Deposition pursuant to Federal Rule of Civil Procedure 30(b)(6).

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 the Notice of Deposition and pertinent transcript excerpts 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 Testimony in Response to Their Second Notice of Deposition Pursuant to Fed. R. Civ. P. 30(b)(6), 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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