

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

SPRINT COMMUNICATIONS COMPANY,)
L.P.)
))
Plaintiff,)
))
vs.)
))
VONAGE HOLDINGS, CORP.,)
VONAGE AMERICA, INC.)
))
Defendants.)

Case No. 05-2433-JWL

**SPRINT COMMUNICATIONS COMPANY, L.P.'S MOTION FOR PROTECTIVE
ORDER ON TOPIC 18 OF VONAGE'S SECOND 30(B)(6) NOTICE**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and D. Kan. Rule 26.2, Sprint Communications Company L.P. ("Sprint") respectfully moves the Court for a Protective Order precluding the deposition noticed by Vonage Holdings Corp. and Vonage America, Inc. of Sprint pursuant to Fed. R. Civ. P. 30(b)(6) on Topic 18 of the Second Notice. In the alternative, Sprint requests guidance from the Court as to the proper scope of Topic 18 so that it is able to effectively prepare a witness to testify.

Sprint's reasons in support of this Motion are stated in the accompanying memorandum, which is incorporated herein by reference. As required by Local Rule 37.1, copies of the Interrogatories, Requests, and Responses in dispute also accompany this Motion.

Respectfully Submitted,

Dated: June 13, 2007

SHOOK, HARDY & BACON L.L.P.

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June 2006, a copy of the above and foregoing was e-filed with the Court using the CM/ECF system which sent notification to the following:

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