

EXHIBIT J

From: Seitz, Adam P. (SHB) [mailto:ASEITZ@shb.com]
Sent: Thu 5/31/2007 1:08 PM
To: McPhail, Donald R.
Cc: Buresh, Eric A. (SHB); Golob, Barry
Subject: RE: 30(b)(6) notice - topic 18

Don,

I disagree with your contention that our objections are "belated." If you would refer to your original topic 18 you would see that it is drastically different in scope than the revised scope on which you are now requesting a witness. Indeed, topic 18 is utterly silent as to the "similarities/differences" between particular inventions. Because your revised scope of topic 18 is tantamount to a new topic, we provided an appropriate response and objections. I also disagree with your contention that our objection based on relevance is "ridiculous." If you would refer to either Vonage's Answer or the Preliminary Pretrial Order, you will see that Vonage has not pled an inequitable conduct defense. Nor has Vonage pled an inventorship defense. Given these facts, our relevance objection is anything but "ridiculous."

The timeliness of our objections and the appropriateness of our relevance objection aside, Sprint simply does not have any information on which it could prepare and produce a witness to testify on topic 18.

Thanks,

Adam