

# EXHIBIT M

**From:** Seitz, Adam P. (SHB)  
**Sent:** Thursday, June 07, 2007 12:43 PM  
**To:** 'McPhail, Donald R.'  
**Cc:** Buresh, Eric A. (SHB); 'Golob, Barry'; Webb, B. Trent (SHB)  
**Subject:** RE: 30(b)(6) notice - topic 18

Don,

I appreciate your request for clarification, which I will attempt to provide. We cannot and will not produce a witness on topic 18 to discuss patents that are not asserted in this lawsuit as such discovery clearly is irrelevant. This consistently has been Sprint's position as evidenced by our objections to Vonage's 2d 30(b)(6) Notice. Moreover, to the extent you want a Sprint witness to discuss the "similarities and differences" between inventions of the individuals named in topic 18, even assuming this information was relevant, Sprint does not have such information so it is unable to prepare and produce a witness in that regard. To the extent you want a witness to discuss the "structure and operation" of the asserted Christie Patents, then we are confused because Sprint has not claimed an actual reduction to practice of the Asserted Patents.

I would note that we are producing Mr. Duree to discuss the structure, operation, design, and development of the prototype, which may address topic 18 even though Sprint has not conducted any analysis to determine if the prototype is covered by the Asserted Patents. If this does not address what you believe to be the scope of topic 18, then we will need to seek guidance from the Court.

Please let me know if it still is your intention to proceed with Mr. Duree's deposition on June 14. If so, we will need to address our dispute concerning topic 18 with the Court as soon as possible.

Thanks,

Adam