

EXHIBIT O

From: Seitz, Adam P. (SHB) [mailto:ASEITZ@shb.com]
Sent: Thursday, May 31, 2007 10:04 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,

Your e-mail below seems to replot ground we previously have discussed numerous times and which I thought we had agreed upon. Also, your e-mail seems to confuse topics 18 and 19 and indiscriminately mixes the scope of those two topics. I will endeavor to clarify our position between the two topics.

As to topic 19, my original e-mail made clear that Sprint will produce a witness to discuss the technical operation of the JCS2000 prototype. However, as I explained to you on a number of previous occasions, Sprint has not conducted any analysis to determine whether the prototype is the "subject of the asserted patents" or whether the prototype is the "subject of patents naming Christie and others." Based on our earlier conversations, I was under the impression that you understood Sprint could not provide a witness to testify as to whether any prototype was "covered by the asserted patents" because this information simply doesn't exist. For this reason, I also was under the impression that we did not have any dispute as to topic 19. Please let me know if this is incorrect.

With regard to topic 18, which is a separate and distinct discussion from the scope of topic 19, we informed the Court during the hearing that we did not know if we could understand and interpret the scope of this topic as it currently is drafted. As you will recall, the Court instructed the parties to meet and confer in this regard to discuss the scope of the topic, which we did. During our meet and confer, we asked that you provide some clarification as to what you were seeking in topic 18 given that it is unintelligible as currently drafted. You did so and, based on your clarification, we cannot provide a witness because Sprint has not conducted such an analysis and does not have this information. Without this information it is, of course, impossible to prepare a witness to testify on behalf of Sprint.

Given Sprint's agreement to produce a witness on topic 19 and our attempts to discuss a reasonable scope for topic 18, your accusation that Sprint is refusing to comply with the Court's Order is baseless. To the extent Sprint is unable to provide a witness to testify on topic 18, as further clarified by Vonage, it is because Sprint does not have any information on which it could prepare a witness to testify.

Sincerely,

Adam

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