

EXHIBIT G

From: McPhail, Donald R. [DRMcPhail@duanemorris.com]
Sent: Tuesday, June 12, 2007 2:40 PM
To: Seitz, Adam P. (SHB)
Cc: Buresh, Eric A. (SHB); Golob, Barry; Webb, B. Trent (SHB)
Subject: RE: 30(b)(6) notice - topic 18

Adam -

Further to my email below, it now appears that it would be more prudent to await resolution of our dispute over topic 18 before proceeding with any deposition of Mr. Duree. As such, we will not proceed with Mr. Duree's deposition on June 14.

As to topic 18, please confirm that Sprint is refusing to produce a witness on the grounds that the testimony sought is not relevant. Please recall that you raised your relevance argument in Sprint's objections and in Sprint's opposition to Vonage's motion to compel, and Judge Waxse rejected those arguments (his order does not limit the scope of the testimony sought under topic 18, or even topic 19). Accordingly, if Sprint continues to assert that the topic is irrelevant, we will seek an appropriate sanction from the Court, including, but not limited to, an order precluding Sprint from presenting any evidence at trial about the structure and operation of inventions designed by Christie or by Christie and others, for example, in response to any assertion of invalidity, double patenting and/or inequitable conduct

Alternatively, please confirm if Sprint is refusing to produce a witness on the grounds that it cannot adequately prepare a witness on this topic. Please recall, however, that you argued in your opposition that Sprint had already adequately prepared a witness on this topic (an argument also rejected by Judge Waxse). Please also recall that the topic does not seek testimony about "similarities and differences". Rather, it seeks the structure and operation of inventions designed by Christie and the structure and operation of inventions designed by Christie and others. Please let me know if you intend to maintain the position that Sprint cannot adequately prepare a witness on this topic.

Finally, your statement regarding reduction to practice is not well taken or understood. The topic is the structure and operation of inventions designed by Christie and of inventions designed by Christie and others. There is nothing in the topic about inventions "reduced to practice" or otherwise embodied in tangible form.

I look forward to receiving a conclusive statement as to Sprint's continued refusal to comply with the Court's outstanding order and provide an adequately prepared witness to testify on topic 19. Should you persist in this course of action, we will have no alternative but to seek appropriate sanctions from the Court.

Don