

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

SPRINT COMMUNICATIONS COMPANY	)	
L.P.,	)	
	)	Case No. 11-cv-2683 JAR/GLR
Plaintiff,	)	
	)	
v.	)	
	)	JURY TRIAL DEMANDED
COX COMMUNICATIONS, INC.,	)	
COXCOM, LLC,	)	
COX KANSAS TELCOM, LLC, and	)	
COX COMMUNICATIONS KANSAS,	)	
LLC,	)	
Defendants.	)	
	)	

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**DECLARATION OF ROBIN SANGSTON IN SUPPORT OF COX  
COMMUNICATIONS, INC.'S MOTION TO DISMISS**

I, Robin Sangston, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an employee of Cox Communications, Inc. ("CCI"), and presently serve as its Vice President - Compliance. I have personal knowledge of the facts set forth herein, except where noted, and, if called to testify, could and would competently testify thereto.

2. CCI is a holding company that provides certain corporate services, such as general corporate management, web hosting, trademark and copyright ownership and registration, accounting, tax and legal services, to CCI subsidiaries and operates its business through these subsidiaries.

3. CCI is incorporated in Delaware and maintains its principal place of business in Atlanta, Georgia. CCI is not registered to do business in any states other than Delaware and Georgia, and, specifically, is not registered to do business in Kansas.

4. CCI has never provided, designed, manufactured, advertised, promoted, offered, or

sold broadband or packet-based telephony products or services, nor any other products or services in Kansas. Rather, CCI provides general administrative services to its subsidiaries such as Cox Kansas Telecom ("CK Telecom") and Cox Communications Kansas ("Cox Kansas"). For instance, CCI provides the marketing platform and infrastructure for CK Telecom and Cox Kansas.

5. CCI does not maintain a place of business, or any offices or facilities in Kansas. Nor does CCI have any employees in Kansas. CCI does not maintain any corporate books or records in Kansas. CCI does not pay taxes in Kansas.

6. Cox Kansas, CK Telecom, CoxCom, LLC ("CoxCom") and CCI are distinct and legally separate entities. In fact, operating entities, such as Cox Kansas and Cox Kansas Telecom deal with customers, provide goods and services, and receive revenues. In contrast, CCI does not conduct these type of day-to-day activities.

7. The one commonality between Cox Kansas, CK Telecom, LLC, Cox Com, LLC, and CCI is that they are all incorporated in Delaware.

8. Cox Kansas provides broadband internet services and is organized and approved to provide these services only in Kansas. Likewise, Cox Communications Arizona, LLC, Cox Communications California, LLC, Cox Communications Georgia, LLC, Cox Communications Gulf Coast, LLC, Cox Communications Louisiana, LLC, Cox Communications Omaha, LLC, Cox Communications Las Vegas, Inc., Cox Communications Hampton Roads, LLC provide broadband internet services in their specific geographic regions, to which they are confined by law and regulation.

9. CK Telecom provides telephony services and is organized and approved to provide these services only in Kansas. Likewise, Cox Arkansas Telecom, L.L.C., Cox Arizona Telecom,

L.L.C., Cox California Telecom, L.L.C., Cox Colorado Telecom, L.L.C., Cox Connecticut Telecom, L.L.C., Cox District of Columbia Telecom, L.L.C., Cox Florida Telecom, L.P., Cox Georgia Telecom, L.L.C., Cox Iowa Telecom, L.L.C., Cox Idaho Telecom, L.L.C., Cox Louisiana Telecom, L.L.C., Cox Maryland Telecom, L.L.C., Cox Missouri Telecom, LLC, Cox Nebraska Telecom, L.L.C., Cox Nevada Telecom, L.L.C., Cox North Carolina Telecom, L.L.C., Cox Ohio Telecom, L.L.C., Cox Oklahoma Telecom, L.L.C., Cox Rhode Island Telecom, L.L.C., and Cox Virginia Telecom, L.L.C. provide telephony products and services in their specific geographic regions, and they are limited to the provision of such products and services in specific geographic regions by law and regulation.

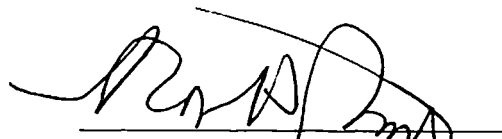
10. CCI does not directly own a majority of Cox Kansas or CK Telecom capital stock. But CCI owns CoxCom; CoxCom owns CK Telecom and Cox Kansas (along with their respective operating entities across the nation). A different CCI subsidiary owns the stock of Cox Kansas.

11. CCI does not provide financing to Cox Kansas or CK Telecom.

12. CCI owns the registration for the service mark "Cox Digital Telephone" and "cox.com" for the benefit of its operating subsidiaries, such as CK Telecom and Cox Kansas.

13. CCI is a subsidiary of Cox Enterprises, Inc., a diversified company with industry leading businesses in communications, media, and automotive services.

Executed this 16th day of April 2012



Robin Sangston