UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION

		
)	
In the Matter of)	
)	
RAMBUS INC.,)	Docket No. 9302
)	
a corporation.)	
)	

Complaint Counsel's Preliminary Witness List

Complaint Counsel hereby designates those persons currently contemplated to be called to testify as witnesses, orally in person or by deposition or investigational hearing transcript, at the hearing in this matter. Complaint Counsel reserves the right (1) not to call any of the persons listed herein to testify at the hearing, as circumstances may warrant; (2) to call as a witness any person identified as a witness by Respondent; (3) to designate additional witnesses as rebuttal witnesses, as needed depending upon issues raised by Respondent, in accordance with the terms of the Scheduling Order dated August 6, 2002; (4) to supplement or amend this preliminary witness list and any future rebuttal witness list to add any individual who is designated by a corporation or other organization to testify on its behalf in a deposition pursuant to Commission Rule of Practice 3.33(c); (5) to supplement or amend this preliminary witness list and any future rebuttal witness list to add any individual for the purpose of establishing the authenticity of documents; and (6) to supplement or amend this preliminary witness list and any future rebuttal witness list as permitted by the Commission's Rules of Practice and by the terms of the Scheduling Order dated August 6, 2002.

Subject to these reservations of rights, Complaint Counsel's preliminary list of witnesses is as follows:

1. Graham Allan

formerly Business Unit Manager

Mosaid Technologies Incorporated

(currently Director of Marketing, SiberCore Technologies)

2. Steven Appleton

Chairman of the Board of Directors, Chief Executive Officer and President **Micron Technology, Inc.**

3. Brian Barbara

President

JAZiO Inc.

4. Richard Barth

4.

(currently Associate, Oppenheimer, Wolff & Donnelly LLP)

11. Charles Donohoe

Senior Vice President & General Patent Counsel

Samsung Electronics Co., Ltd.

12. Bob Goodman

Chief Executive Officer

Kentron Technologies, Inc.

13. Jackie Gross

Director - Memory Central Direct Procurement

Hewlett-Packard Company

14. Richard Heye

Vice President, Platform Engineering & Infrastructure

Advanced Micro Devices, Inc.

15. Gordon Kelley

Senior Engineer

IBM Corporation

16. John Kelly

Executive Vice President and General Counsel

Electronic Industries Alliance

President

JEDEC Solid State Technology Association

17. Mark Kellogg

Distinguished Engineer

IBM Corporation

18. Ilan Krashinsky

Memory Technology Expert

Hewlett-Packard Company

19. Thomas Landgraf

DRAM Senior Procurement Engineer

Hewlett-Packard Company

20. Terry Lee

Executive Director – Advanced Technology and Strategic Marketing **Micron Technology, Inc.**

21. Joe Macri

Director of Technology

ATI Technologies Inc.

22. Pete MacWilliams

Senior Fellow

Intel Corporation

23. Willi Meyer

Manager, Technology Marketing Division

Infineon Technologies AG

24. Dr. K. H. Oh

formerly Executive Vice President, Semiconductor Division

Hyundai Electronics Industries Co., Ltd.

(currently Professor, Korean Advanced Institute of Science & Technology)

25. Dr. Martin Peisl

Director – Graphics and Specialty Memories

Infineon Technologies North America Corp.

26. Steven Polzin

Senior AMD Fellow

Advanced Micro Devices, Inc.

27. Dr. Werner Reczek

Vice President and Managing Director

Infineon Technologies AG

28. Desi Rhoden

President

Advanced Memory International, Inc.

29. Gil Russell

retired

(formerly Technical Marketing Manager, Infineon Technologies AG; Senior Strategic

Marketing Engineer, **NEC Electronics Corp.**; and Senior Strategic Marketing Specialist, **Samsung Electronics Co., Ltd.**)

30. Brian Shirley

Design Operations Manager

Micron Technology, Inc.

31. Howard Sussman

Senior Manager, Marketing & Development

Sanyo Semiconductor Corporation

32. Farhad Tabrizi

Vice President, Worldwide Marketing of Memory Products

Hynix Semiconductor Inc.

33. Lester Vincent

Partner

Blakely Sokoloff, Taylor & Zafman

34. Barry Wagner

Manager, Technical Marketing

nVIDIA Corporation

35. Brett Williams

Segment Enabling Specialist – Desktop PC

Micron Technology, Inc.

36. Bryn Young

Director, Graphics Board Products

nVIDIA Corporation

In addition to the individuals listed above, Complaint Counsel expects to introduce into evidence at trial, as party admissions, portions of the prior deposition or trial testimony of various present or former directors, officers, employees or agents of Respondent Rambus Inc.

Respectfully submitted,

M. Sean Royall Geoffrey D. Oliver Malcolm L. Catt John C. Weber Robert P. Davis Cary E. Zuk

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DATED: September 30, 2002