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In addition, we agreed that I would attempt to ascertain whether we would agree to further narrowing our document requests with respect to the Rambus/Rambus IP-related document requests, withdraw our requests, or move to compel. We understand your position to be that all responsive documents had been previously produced, any supplemental production of documents after December 31, 2000, and a search for any responsive documents that have not been previously produced that may potentially be responsive to the new requests would be overly burdensome, in light of its marginal relevance in this litigation. We agreed to discuss this category of documents in a later discussion this week, after appropriate discussions with our client.

With respect to the DRAM chip pricing issue, we still do not appear to be any nearer to an agreement. I expressed to you our willingness to significantly narrow our requests on this topic to capture the narrow issue regarding the effect of Rambus and Rambus's royalties on DRAM chip pricing. Nevertheless, it was your initial position, and still continues to be your

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12. For each of the following technologies:<sup>2</sup>

(1) ~~programmable CAS latency~~

(2) programmable burst length,

(3) on-chip PLL or on-chip DLL,

(4) dual-edge clocking,

(5) multi-bank design,

(6) externally supplied reference voltage,

(7) low-voltage swing,

(8) source-synchronous clocking, and

(9) auto pre-charge,

produce:

a. all documents describing, analyzing, or referring to the technology as a feature or possible feature of DRAMS;

b. all documents describing, analyzing, or referring to the possible inclusion of the technology in any JEDEC standard;

c. all documents relating to the importance of the technology to any DRAM design or architecture, including SDRAM, DDR SDRAM, DDR 2 SDRAM, and RDRAM;

d. all documents constituting, discussing or relating to any patents or patent applications covering or potentially covering the technology;

e. all documents listing, describing, or evaluating alternative technologies or features to perform the same functions as the technology either in a synchronous or

asynchronous system;

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h. all documents listing, describing, or evaluating how the technology is described in any patent description written or issued with a priority date prior to January 1, 1999;

i. all documents describing or referring to any patents or patent applications

j. all documents describing, memorializing, reflecting or referring to any meetings, conferences, or communications relating to any patents, or patent applications containing claims that relate to the technology or feature; and

k. all documents describing, analyzing, or referring to any assertion or possible assertion by Rambus of any intellectual property rights with respect to the technology