



SUBPOENA DUCES TECUM

Issued Pursuant to Rule 3.34(b), 16 C.F.R. § 3.34(b)(1997)

1. TO

MICRON TECHNOLOGY, INC.
8000 South Federal Way
Boise, Idaho 83707-00006

2. FROM

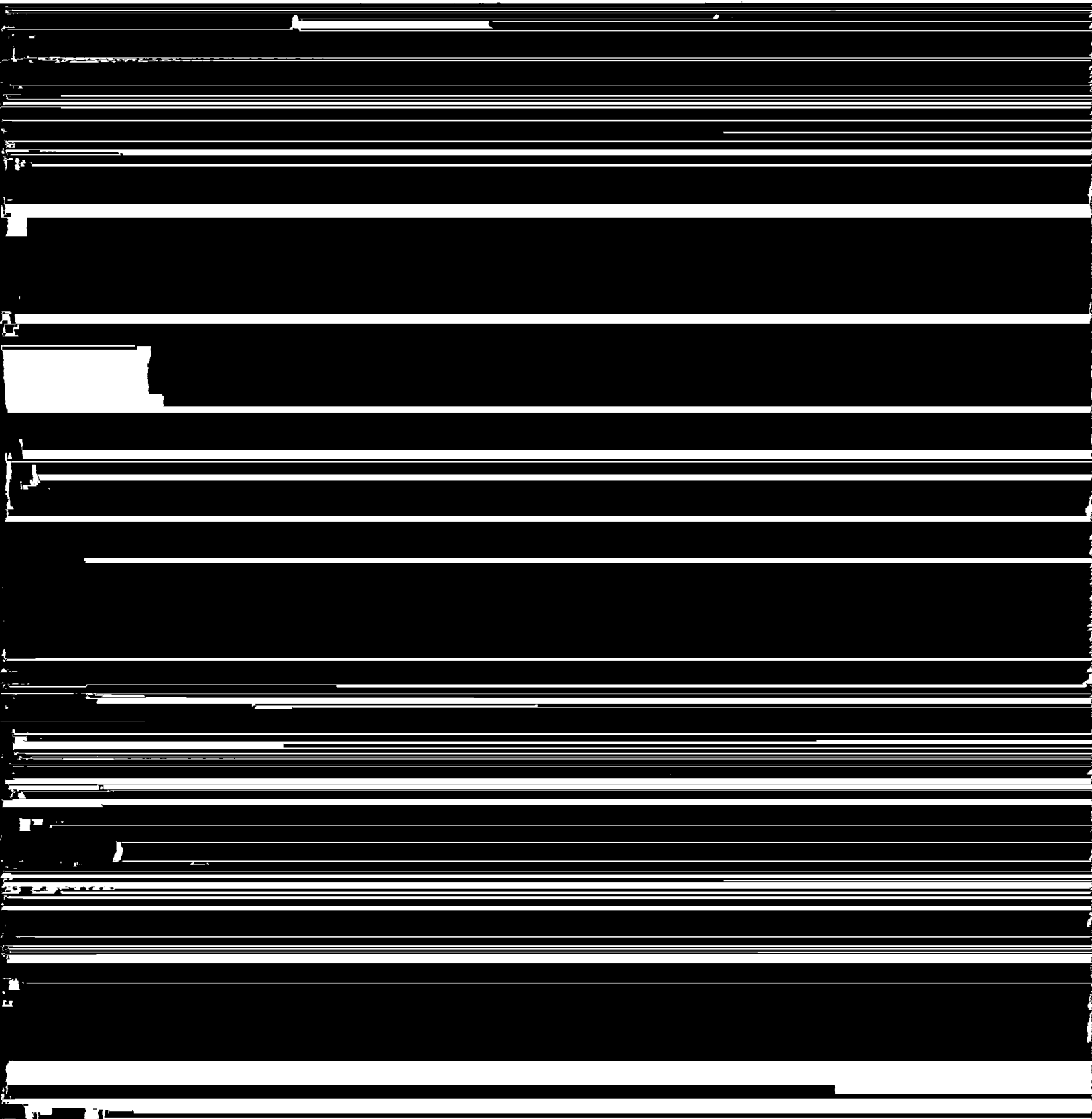
UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

This subpoena requires you to produce and permit inspection and copying of designated books, documents, and

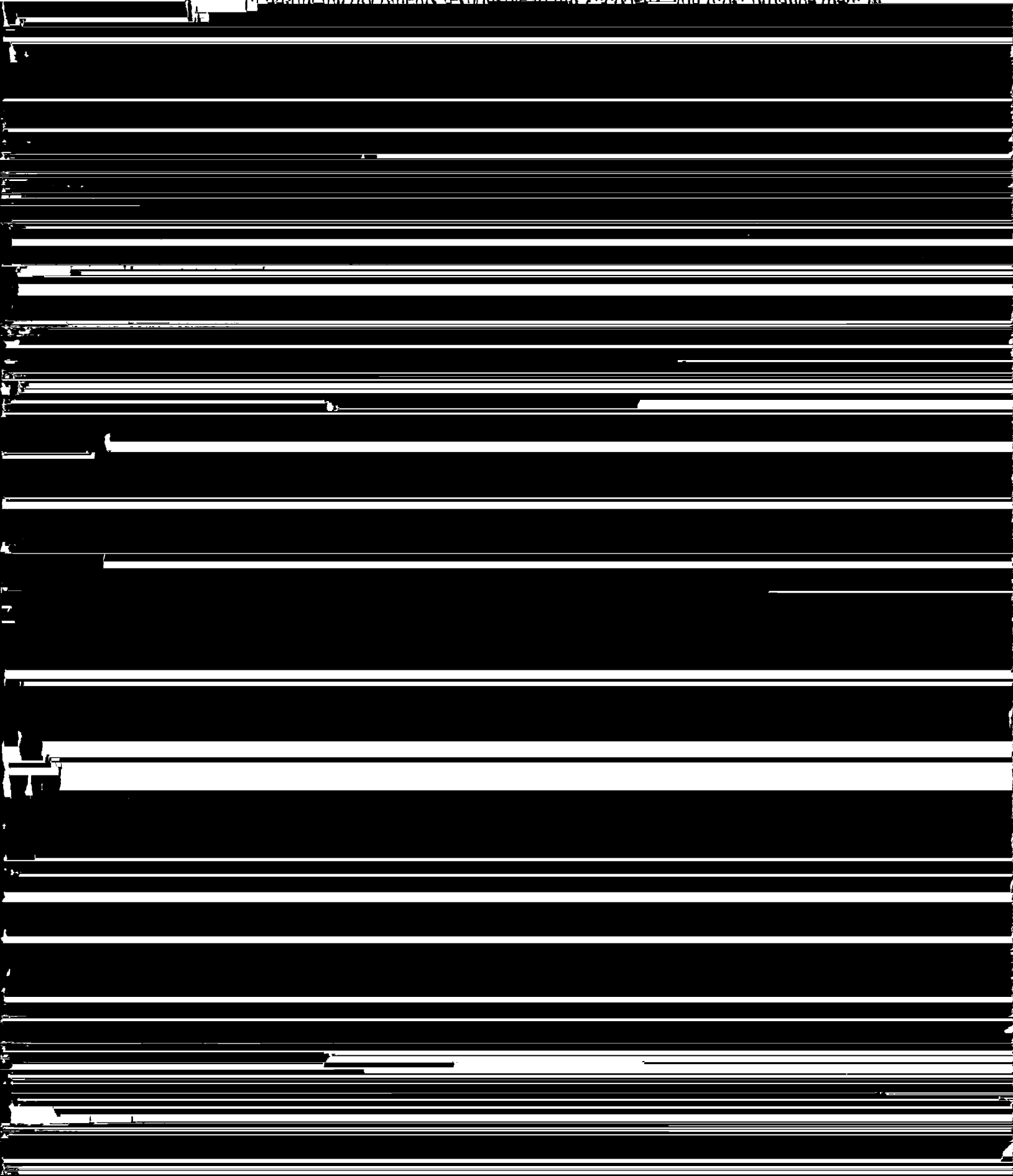
ATTACHMENT A

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions apply to this *Subpoena Duces Tecum*:



In producing documents responsive to this subpoena you must produce them in



2. All documents relating to the issue of whether any of the technology disclosed to

you by Rambus under the Rambus NDA was previously known to you

3. All documents relating to the issue of whether any of the technology disclosed to you by Rambus under the Rambus NDA was anticipated by, or obvious under, prior art.

4. All documents relating to the issue of whether any of the technology disclosed to you by Rambus under the Rambus NDA was novel, original, or an advance over prior art.

5. Documents sufficient to identify the name(s) of any inside counsel and outside counsel who in 1989, 1990, 1991, 1992, or 1993 reviewed or considered:

a. any of the disclosures made by Rambus to you under the Rambus NDA;

12. All documents relating to any of the following technologies, features, or possible

RDRAM:

(1) _____ CAS14 _____

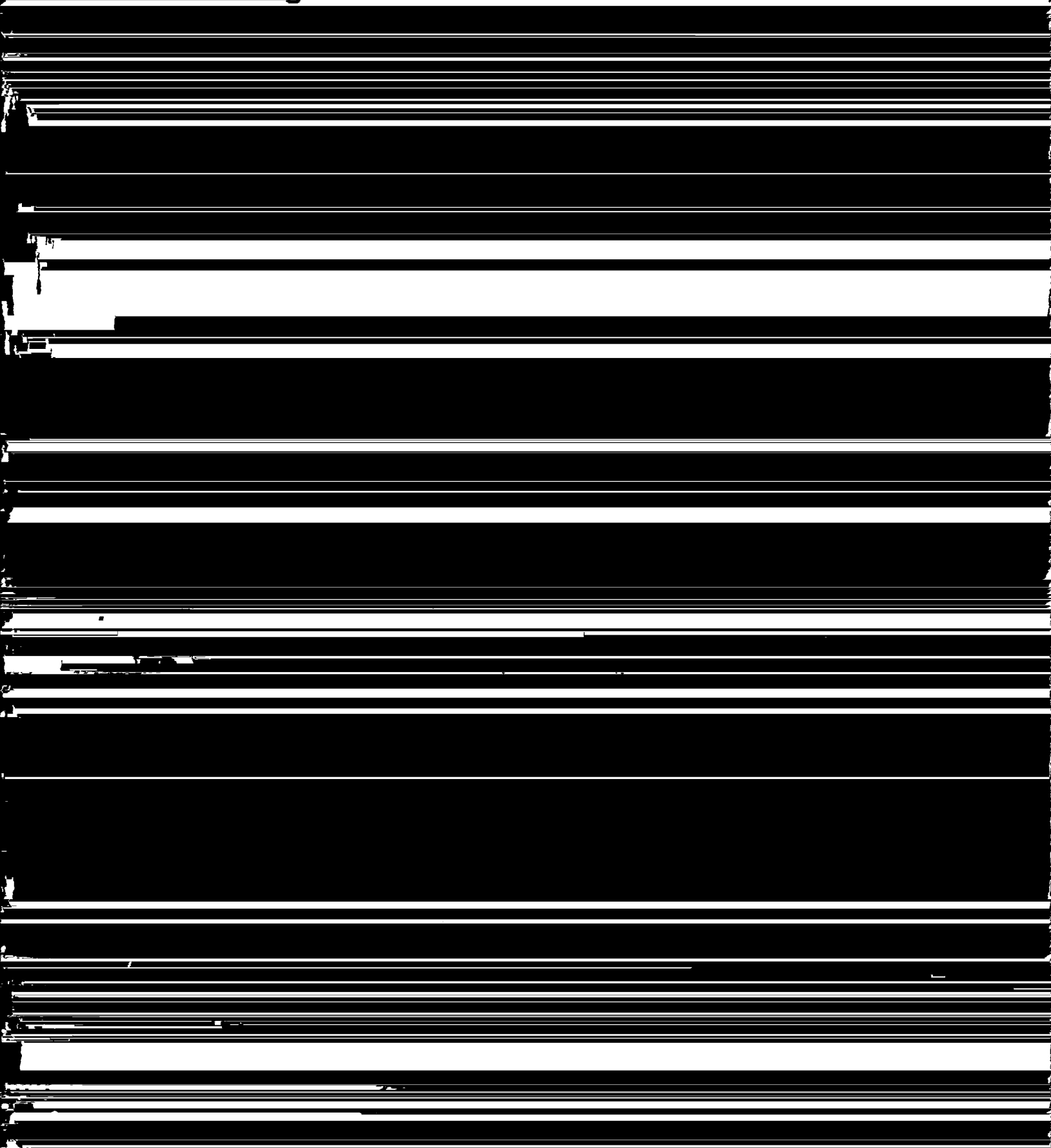
including but not limited to employment agreements regarding disclosure or discussion of pending or future patent applications

18. All documents relating to patents, pending or future patent applications, or contemplated patent amendments or filings that any employee of the company considered disclosing to JEDEC, whether or not disclosure actually occurred.

contemplated patent filings or amendments that any one from your company believed, or were in fact, related to or were involved in the work of JEDEC .

20. All documents relating to any effort to search, or any decision not to search, for

25. All documents relating to the licensing, proposed licensing, or refusal to license



ADT, SDRAM Inc., Mosaid, Synclink, Ramlink, AMI2, InQuest Market Research, Semico
Research Corp., Electronics Buyers News, Electronic News, EE Times, any other electronic

memoranda generated by or received from any person who attended a JEDEC meeting on behalf of the company, whether formal, informal, or otherwise.

52. All documents, including but not limited to emails, notes, and memoranda, authored, prepared, adopted by, or distributed to Gene Cloud, Joe Daltoso, Bob Fusco, Jerry

Johnson, Terry Lee, Jeff Meilhoux, Kun Ohri, Tom Pawloski, Kevin Ryan, Steve Trieb, Tom

d. the daily quantity of DRAM chips sold.

58. All documents that support or relate to the proposition that royalties paid by the company to Rambus during the relevant pricing period had an impact on the sale price of the company's DRAM chips during the relevant pricing period.

59. All documents relating to any estimate of the company's market share in the DRAM chip market during the relevant pricing period.

60. All documents relating to any communication between the company and any

67. All documents responsive to the subpoena attached as exhibit "B" hereto that were not previously produced by you to Rambus, including but not limited to those documents

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Ken A.
Dell P.
Scott
Inada
Paul E.
Mark I.
Howard
Oleg P.
Shigeru
Michin

Don
Mie
Oki
Aki
Leif
Y.C.
Jim
Jan
Fin
Finn
Rui
Rob
Bill
Sam
Dika
Mary
Hong
Tom
Mark
Mills
Rudi
Duke
Field
Ollie
Randy
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Chris
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Jim T.
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1. INTRO

The meeting
is in session

2. TALK

Mr. Kish

3. VOTE

Mr. Ryan
APPROX
unanimous

3.1 Summary

The result
meeting is

3.2 Summary

A final
presentation
of the plan

4. DRAFT

Ordinances

4.1 Summary

Mr. Kish
discussed

4.2 Summary

This was

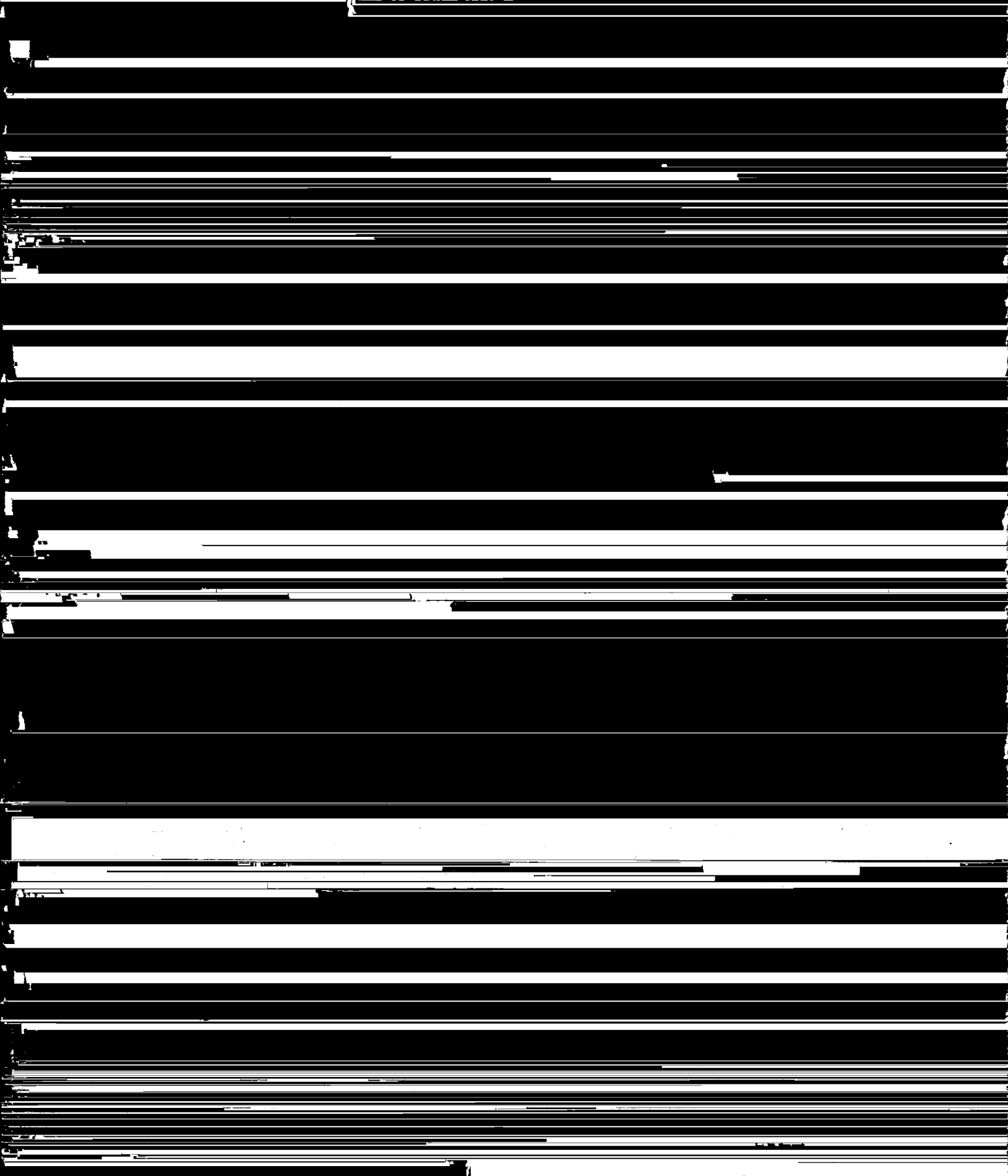
4.3 Summary

There is
a

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file

IN THE UNITED STATES DISTRICT COURT



until completed. The testimony at the deposition shall be taken by the court reporter.

stenographic means.

In accordance with Federal Rule of Civil Procedure 30(b)(6), Micron shall designate one or more officers, directors, managing agents or other persons who consent to

testify on its behalf as to each of the topics set forth in the attached Schedule A. Micron shall

Dated: January 12, 2001

[Handwritten signature]

One James Center
901 East Cary Street
Richmond, Virginia 23219-4030
(804) 775-1000

C. Torrence Armstrong, VSB #13739
Warren E. Zirkle, VSB #15321
McGUIRE WOODS LLP

1750 Tenth Street, Suite 1000

SCHEDULE A

Topics

1. The facts and circumstances surrounding Micron's decision to join, membership in and participation in the activities of JEDEC, including participation in JEDEC meetings or standards-setting activities relating to adoption of SDRAM and DDR SDRAM.

SCHEDULE B

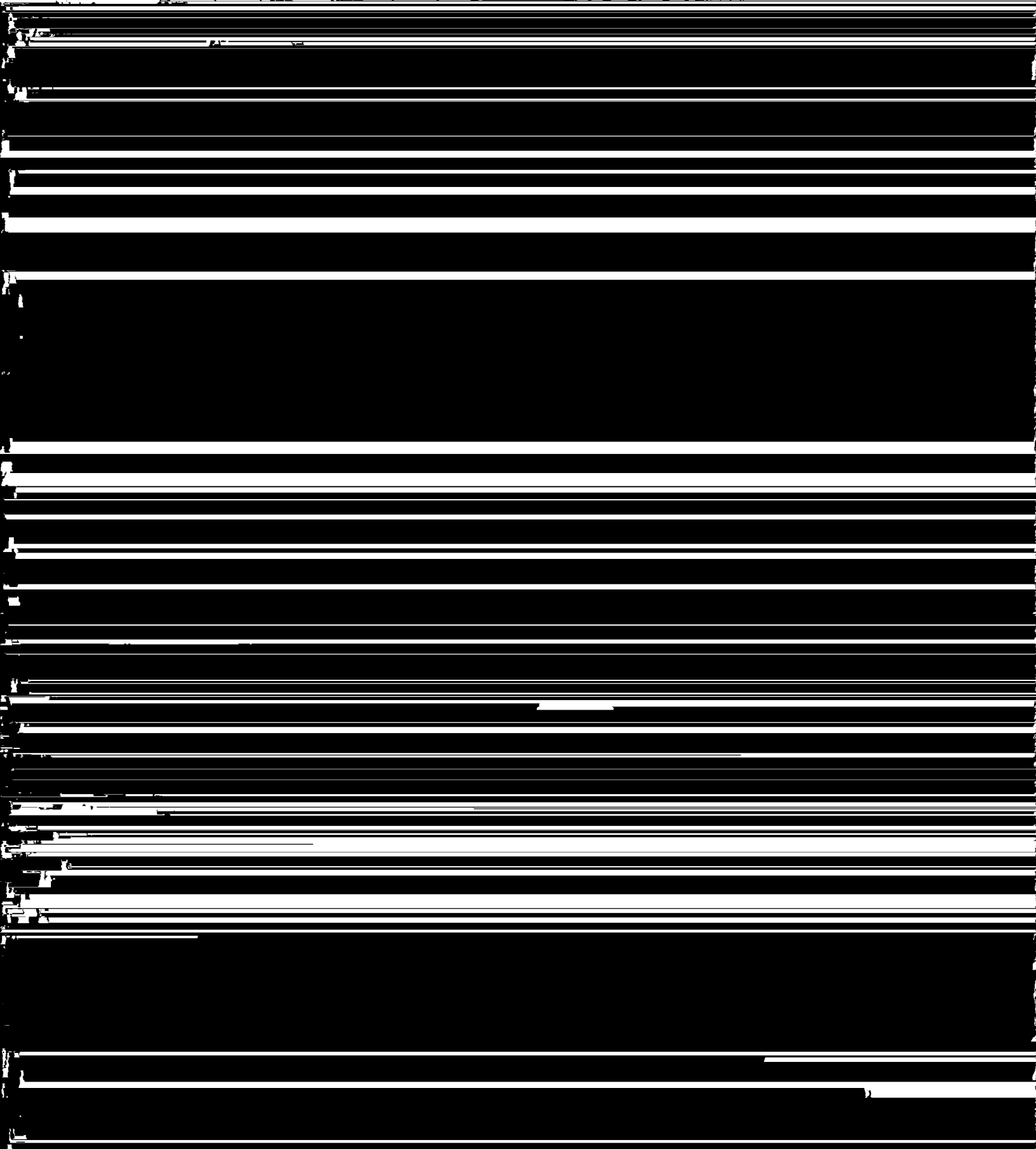
Definitions

1. The term "Micron" means Micron Technology, Inc., and all of Micron's corporate parents, corporate predecessors and past or present subsidiaries, affiliates, divisions

2. The term "JEDEC" means the JEDEC 119...

CERTIFICATE OF SERVICE

I certify that on this 12th day of January, 2001, a copy of the foregoing Notice of



Issued by the
UNITED STATES DISTRICT COURT

DISTRICT OF

IDAHO

RAMBUS, INC.,

SUBPOENA IN A CIVIL CASE

CASE NUMBER: 1 3:00CV524

V.

INFINEON TECHNOLOGIES AG, INFINEON



PROOF OF SERVICE

DATE	PLACE
SERVED	January 12, 2001
SERVED ON (PRINT NAME)	MANNER OF SERVICE
Micron Technology, Inc.	Federal Express
SERVED BY (PRINT NAME)	TITLE
Clifford E. Wilkins, Jr., Esq.	(Attorney for Infineon Technologies AG, Infineon Technologies North America Corp. and Infineon Technologies Holding North America Inc.)

DECLARATION OF SERVER

**STIPULATION RE USE IN *FTC v. RAMBUS*
OF PREVIOUSLY PRODUCED DOCUMENTS**

Micron Technology, Inc. hereby stipulates and agrees that the documents it
previously produced to Rambus or other parties in the case entitled *Rambus Inc. v. Infineon*

FTC v. Rambus matter as if they had been produced in that matter.