

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

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

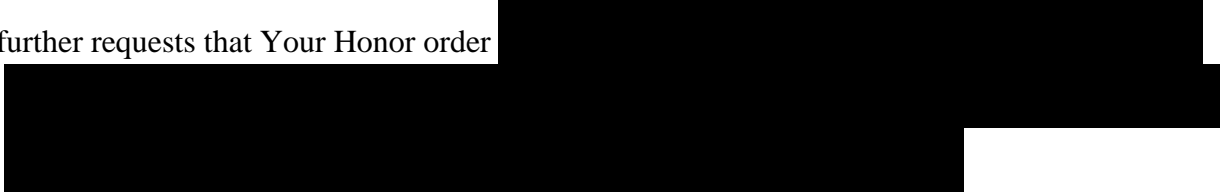
**RAMBUS INC.'S ANSWER TO MICRON TECHNOLOGY'S MOTION  
FOR LEAVE TO SUPPLEMENT RECORD IN SUPPORT OF MOTION TO  
LIMIT OR QUASH RAMBUS'S NOVEMBER 6, 2002 SUBPOENAS  
AD TESTIFICANDUM AND SUBPOENAS DUCES TECUM**

Respondent Rambus Inc. ("Rambus") respectfully submits this memorandum in response to the motion by Micron Technology, In



It should be understood that Rambus does not seek to impose upon Mr. Mailloux lightly. Rather, Rambus has pursued Mr. Mailloux's deposition because it believes his testimony to be important to its defense. In his *Micron* deposition, Mr. Mailloux testified, *inter alia*, that he was actively involved with various industry standards groups including SLD RAM (also known as SyncLink) and AMI2, industry consortia seeking to find alternative technologies to those claimed by Rambus's patents, and with ADT, the industry consortium attempting to develop next generation DRAM memory standards. The possible alternative technologies discussed by these consortia is directly relevant to the allegations pertaining to the alternative technologies that could have been incorporated into the JEDEC SDRAM and DDR SDRAM standards in lieu of Rambus's patent.

further requests that Your Honor order



Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Jacqueline M. Haberer, hereby certify that I am the undersigned and I am the attorney-in-fact for the undersigned party in the above-captioned matter. I am the undersigned and I am the attorney-in-fact for the undersigned party in the above-captioned matter.