UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

DEC 3 O 2002

SECRETARY

In the Matter of

RAMBUS INC.,

Docket No. 9302

a corporation.

OPPOSITION BY RESPONDENT RAMBUS INC. TO MOTION BY DE DIOS & ASSOCIATES TO QUASH SUBPOENA DUCES TECUM

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The motion by de Dios & Associates ("de Dios") should be denied, for several reasons. De Dios' claims of undue burden should be rejected because they are based upon the fundamental misperception that Rambus's subpoena requires the review and copying by de Dios of files containing responsive documents. As Rambus has done on several other occasions this fall, it is willing to have Rambus's own lawvers and

paraiegais review de Dios Tries and Triag responsive documents. The magged documents would then be copied and submitted to de Dios' counsel for a quick privilege

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individuals who repair - and am all hand the hand as a few destals a deal and belief and

DATED: December 27, 2002 Respectfully submitted,

Gregory P. Stone Steven M. Perry Sean P. Gates Peter A. Detre MUNGER, TOLLES & OLSON LLP 355 South Grand Avenue, 35th Floor Los Angeles, California 90071 (213) 683-9100

A. Douglas Melamed IJay Palansky Kenneth A. Bamberger WILMER, CUTLER & PICKERING 2445 M Street, N.W. Washington, D.C. 20037 (202) 663-6000

Sean C. Cunningham John M. Guaragna Gray, Cary, Ware & Freidenrich LLP 401 "B" Street, Suite 2000 San Diego, California 92101 (619) 699-2700

PROOF OF SERVICE BY FACSIMILE/FEDERAL EXPRESS

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 355 South Grand Avenue, 35th Floor, Los Angeles, California 90071.

On December 27, 2002, I served the foregoing document described as: OPPOSITION BY RESPONDENT RAMBUS INC. TO MOTION BY DE DIOS & ASSOCIATES TO QUASH SUBPOENA DUCES TECUM on the designated parties in this action by having a two converted by foreginal machine to the number listed below. I caused the

On December 27, 2002, I also served a copy of the aforementioned document on the designated parties in this action by Federal Express overnight courier service. I am "readily familiar" with the firm's practice of collection and processing correspondence for delivery to an employee of Federal Express. Under that practice it would be delivered to an employee of Federal Express on that same day at Los Angeles, California with charges to be billed to Munger, Tolles & Olson's account for delivery to the office of the addressee on December 30, 2002 in the ordinary course of business.

By Facsimile and FedEx

M. Sean Royall, Esq.
Federal Trade Commission
600 Pennsylvania Avenue, N.W.
Room H-372
Washington, D.C. 20580
Facsimile: 202-326-2884

By FedEx

F. J. e.

Hon. James P. Timony Administrative Law Judge Federal Trade Commission

By Facsimile and FedEx

Geoffrey Oliver, Esq. Malcolm L. Catt, Esq. Federal Trade Commission 601 New Jersey Avenue Washington, D.C. 20001 Facsimile: 202-326-3496

By Facsimile and FedEx

Richard B. Dagen, Esq. Federal Trade Commission 601 Pennsylvania Avenue, N.W.



600 13th Street, N.W. Washington, D.C. 20005 Facsimile: 202-756-8087

Executed on December 27, 2002, at Los Angeles, California.

Leclare that I am employed in the office of a member of the bar of this court at whose

Eunice Ikemoto

MUNGER, TOLLES & OLSON LLP

355 SOUTH GRAND AVENUE

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M. SEAN ROYALL, ESQ. FEDERAL TRADE COMMISSION 202-326-2884	TELEPHONE	FAX	o je odlo tek	TO
	202-326-3663	202-326-2884	FEDERAL TRADE COMMISSION	M. SEAN ROYALL, ESQ.

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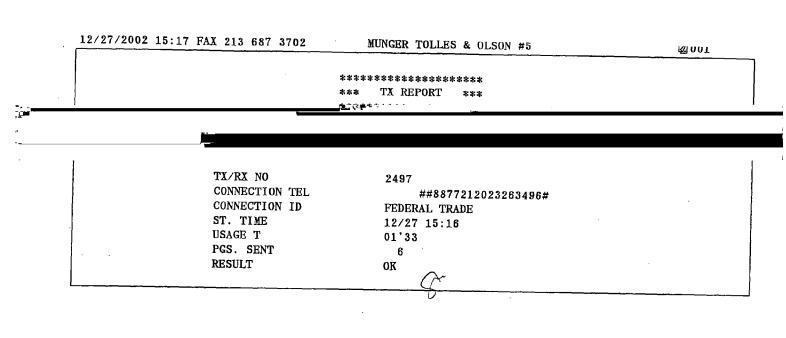
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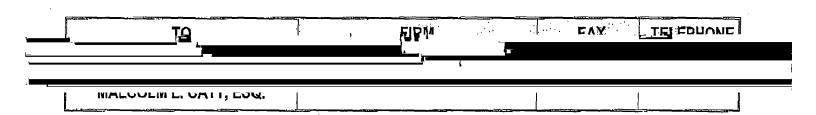
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CERTIFICATION

I, Steven M. Perry, hereby certify that the electronic copy of Opposition By

original and mat a paper copy with an original signature is being med with the Secretary of the Commission on December 30, 2002 by other means.

Dated: December 27, 2002

/s/ Steven M. Perry