

PUBLIC

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

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

DECLARATION OF GREGORY P. STONE

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1. I, Gregory P. Stone, have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently under oath to such facts.

2. I am a member of the law firm of Munger, Tolles & Olson LLP, counsel for Rambus Inc. in this proceeding. On December 18, 2002, I met and conferred with Complaint Counsel regarding, *inter alia*, the scope of discovery into privileged attorney-client communications and work product materials in this proceeding. During that discussion, Complaint Counsel asserted the position that a discovery order entered by Judge Payne in Rambus's civil lawsuit with Infineon, which required Rambus to produce certain documents containing attorney-client communications and to allow witnesses to testify regarding such communications, was entitled to preclusive effect in this proceeding. Complaint Counsel argued that, based on the doctrine of collateral estoppel, they were entitled to use the documents

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CERTIFICATE OF SERVICE

I, Jacqueline M. Haberer, hereby certify that on January 21, 2003, I caused a true and correct copy of the *Declaration of Gregory P. Stone* to be served on the following persons by hand delivery:

Hon. James P. Timony
Administrative Law Judge
Federal Trade Commission
Room H-112
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

M. Sean Royall
Deputy Director, Bureau of Competition
Federal Trade Commission
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Federal Trade Commission
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Jacqueline M. Haberer