

**UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION**

Public Version

In the Matter of

RAMBUS INCORPORATED,

a corporation.

Docket No. 9302

**COMPLAINT COUNSEL'S MOTION TO COMPEL AN ADDITIONAL DAY OF
DEPOSITION TESTIMONY OF RICHARD CRISP**

Complaint Counsel respectfully seeks to compel an additional day of deposition testimony from Mr. Richard Crisp, Rambus's primary representative at JEDEC from early 1992 until Rambus withdrew from JEDEC in June 1996 and a key figure in Rambus's efforts to draft claims to be added to pending patent applications covering the work Mr. Crisp observed at JEDEC.

Complaint Counsel completed a single day of deposition questioning of Mr. Crisp on February 14, 2003. Complaint Counsel had previously informed counsel for Rambus, which also represents Mr. Crisp, that it thought more than one day of testimony would be necessary, but Rambus's counsel said it would limit the deposition to one day. Despite its best efforts, Complaint Counsel was unable to complete its questioning of Mr. Crisp in this time. Complaint Counsel has sought additional time to question Mr. Crisp, but Rambus's counsel has refused to make him available for any further questioning.

