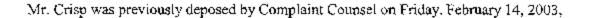


## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the N	Matter of	į
RAMB	US INC.,	) Docket No. 9302
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		O COMPEL AN ADDITIONAL DAY ON TESTIMONY OF RICHARD CRISP
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Teprese	ntative of the Joint Electronic	es Device Engineering Council ("JEDEC") committee from
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not Mr. Crisp.

Further, Complaint Counsel has not presented compelling reasons for ordering an additional day of deposition testimony outside of the close of discovery. First, it does not appear that Rambus produced additional documents since Mr. Crisp's February 14 deposition. Thus, Complaint Counsel had all documents upon which its examination was based prior to Mr.

Crisp's deposition. Second, Complaint Counsel has access to over 60 hours of testimony provided by Mr. Crisp in depositions and at trial in private litigation. While these private matters did not pose the identical issues addressed in the instant action, they did raise numerous similar issues. At the least, Complaint Counsel could have used these materials to hone their deposition examination of Mr. Crisp prior to his February 14 deposition. If Complaint Counsel believed,

