

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

**PUBLIC**

**In the Matter of**

**RAMBUS INC.,**

**a corporation.**

**Docket No. 9302**

**UNOPPOSED MOTION BY RESPONDENT RAMBUS INC. FOR LEAVE TO  
FILE REPLY MEMORANDUM IN SUPPORT OF RESPONDENT'S  
APPLICATION FOR REVIEW OF THE FEBRUARY 28, 2003 ORDER  
GRANTING COMPLAINT COUNSEL'S MOTION TO COMPEL DISCOVERY  
RELATING TO SUBJECT MATTERS AS TO WHICH RAMBUS'S PRIVILEGE  
CLAIMS WERE INVALIDATED ON CRIME-FRAUD GROUNDS AND  
SUBSEQUENTLY WAIVED, PURSUANT TO RULE 3.23(b) OR, IN THE  
ALTERNATIVE, REQUEST FOR RECONSIDERATION OF THAT ORDER**

Respondent Rambus Inc. requests leave to file a short reply memorandum in support of its Application for Review of the February 28, 2003 Order Granting Complaint Counsel's Motion To Compel Discovery Relating To Subject Matters As To Which Rambus's Privilege Claims Were Invalidated On Crime-Fraud Grounds And Subsequently Waived, Pursuant to Rule 3.23(b) or, in the Alternative, Request for Reconsideration of that Order, filed March 7, 2003 ("Rambus's Application"). The proposed reply brief, lodged herewith, will address new arguments and authorities raised in the opposition brief served by Complaint Counsel on March 17, 2003 (and filed on March 18, 2003), and not raised in Complaint Counsel's moving and supplemental papers filed in connection with their original motion. *See* Tabs E & G to Rambus's Application.

It also briefly addresses the issue of waiver raised in Complaint Counsel's opposition to Rambus's application, which issue, although raised in the papers filed in connection with the original motion, was not a basis for the Order for which reconsideration or



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**ORDER GRANTING RESPONDENT'S UNOPPOSED MOTION FOR LEAVE TO FILE REPLY MEMORANDUM IN SUPPORT OF RESPONDENT'S APPLICATION FOR REVIEW OF THE FEBRUARY 28, 2003 ORDER GRANTING COMPLAINT COUNSEL'S MOTION TO COMPEL DISCOVERY RELATING TO SUBJECT MATTERS AS TO WHICH RAMBUS'S PRIVILEGE CLAIMS WERE INVALIDATED ON CRIME-FRAUD GROUNDS AND SUBSEQUENTLY WAIVED, PURSUANT TO RULE 3.23(b) OR, IN THE ALTERNATIVE, REQUEST FOR RECONSIDERATION OF THAT ORDER**

Upon consideration of Respondent's Unopposed Motion for Leave to File Reply Memorandum in Support of Respondent's Application for Review of the February 28,

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