

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 FOR ACCEPTANCE OF CORRECTED VERSION OF  
"Tab 9" TO COMPLAINT COUNSEL'S MOTION FOR ADDITIONAL ADVERSE  
INFERENCES AND OTHER APPROPRIATE RELIEF NECESSARY TO REMEDY RAMBUS  
INC.'S INTENTIONAL SPOILIATION OF EVIDENCE**

On March 27, 2003, Complaint Counsel Filed a Motion for Additional Adverse Inferences and Other Appropriate Relief Necessary to Remedy Rambus Inc.'s Intentional Spoliation of Evidence ("Motion"). Upon reviewing "Tab 9" to the Motion, Complaint Counsel discovered that, inadvertently, incorrect excerpts from the February 5, 2003 Deposition Transcript of Joel Karp were included behind "Tab 9." Accordingly, Complaint Counsel requests that Your Honor accept the correct excerpts for "Tab 9," filed herewith, as a substitute for the excerpts that were initially filed.

Respectfully submitted,

\_\_\_\_\_  
M. Sean Royall  
Geoffrey D. Oliver

BUREAU OF COMPETITION  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580  
(202) 326-3663  
(202) 326-3496 (facsimile)

COUNSEL SUPPORTING THE COMPLAINT

Dated: April 4, 2003

**CERTIFICATE OF SERVICE**

I, Melissa Kassier, hereby certify that on April 4, 2003, I caused a copy of the following materials:

1. Complaint Counsel's Motion for Acceptance of Corrected Version of "Tab 9" to Complaint Counsel's Motion for Additional Adverse Inferences and Other Appropriate Relief Necessary to Remedy Rambus Inc.'s Intentional Spoliation of Evidence,

to be served upon the following persons:

by hand delivery to:

Hon. Stephen J. McGuire  
Chief Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

and by electronic mail and overnight courier to:

A. Douglas Melamed, Esq.  
Wilmer, Cutler & Pickering  
2445 M Street, NW  
Washington, DC 20037-1402

Steven M. Perry, Esq.  
Munger, Tolles & Olson LLP  
355 South Grand Avenue  
35<sup>th</sup> Floor  
Los Angeles, CA 90071

*Counsel for Rambus Incorporated*

---

Melissa Kassier

**TAB 9 REDACTED**