

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

_____)	PUBLIC VERSION
In the matter of)	
RAMBUS INCORPORATED,)	Docket No. 9302
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_____)	

**DECLARATION OF D.S. CHUNG IN SUPPORT OF
HYNIX’S MOTION FOR *IN CAMERA* TREATMENT OF PROPOSED EVIDENCE**

I, D.S. CHUNG, declare as follows:

1. I am Vice President of Intellectual Property Rights at Hynix Semiconductor, Inc. (“the Company”), which develops, designs and manufacturers DRAMs, computer memory technology. I have worked in the Patent department of the Company for more than fifteen years, and I am familiar with the documents attached as Exhibits A-F to this declaration.

2. Exhibits A-F are excerpts of analyses created by the Company’s internal business units and strategic marketing teams primarily for internal use and limited distribution at the Company. Only Exhibit E, created for a meeting between the Company and Rambus, was ever distributed to anyone outside of the Company, and then only to the Rambus attendees.

3. Each of the Exhibits A-F contain current, detailed cost and price information on DRAMs, specifically SDRAM and/or RDRAM, including but not limited to cost and price premiums projections and analyses; manufacturing yield analyses and comparisons; market risk analyses; and market performance analyses. This information provides a critical basis for the

marketplace vis a vis its direct competitors, other DRAM manufacturers. Because of the relative stability of certain components of this cost and price information, the information will remain of critical competitive importance for at least ten years.

4. More particularly:

a) Exhibit A (beginning bates nos. HR905_089448), entitled *DR-DRAM Cost Premium (Vs. SDRAM)*

and yield analyses developed by the Company. All of the foregoing are current trade secrets and access to this information remains restricted within the Company to a “need to know basis.”

Furthermore, the Company’s numbers and calculations contained in Exhibit E are viable today, are currently relied upon and will be relied upon in the future by the Company in conducting its business.

f) Exhibit F (beginning bates nos. HR905_089271), entitled *Rambus Review (2001)* dated March 21, 2001, was created by the DRAM Business Unit for an internal analysis. Its distribution was limited to those persons with a “need to know” within Hynix. Many of these pages retain their original Korean language text; these pages generally discuss production plans and more specifically set forth wafer revenue on a per unit basis and profit and loss by cost analysis. All of the foregoing information is a current trade secret and access to this information remains restricted within the Company to a “need to know basis”. Furthermore, the Company’s numbers and calculations contained in Exhibit F are viable today, are currently relied upon and will be relied upon in the future by the Company in conducting its business.

5. All of the information contained in Exhibits A-F was developed exclusively by Hynix from Hynix confidential financial and production information solely for its internal use and distribution. The only exception to the foregoing is Exhibit E, which was distributed to a limited number of Rambus meeting attendees.

competitor, that competitor would be able to exact immediate harm to the Company in the marketplace because it would know precisely the strengths and weaknesses of Hynix's internal marketing strategy. It could adjust its own strategy to exploit any vulnerabilities in, for example, Hynix's production capacities or overhead expenses.

7. I am informed and believe that the information contained in Exhibits A-F has never been distributed or otherwise made known outside of the Company, except for the meeting identified above and pursuant to the terms and conditions of the protective order in place in the Rambus litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this _____ day of April, 2003, in

_____.

D.S. CHUNG

SV #130229

TABS A – F
REDACTED