

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

**PUBLIC VERSION**

**In the Matter of**

**RAMBUS INC.,**

**a corporation.**

**Docket No. 9302**

**THE PARTIES' FIRST SET OF STIPULATIONS**

**I. Stipulations of Fact**

The following is hereby stipulated and agreed on for purposes of this proceeding.

1. Among other things, Rambus develops and licenses memory technologies to

7. Rambus and Samsung signed a Non-Disclosure Agreement in or about March 1992.

8. Rambus' International Patent Application number WO 91/16680 became publicly available in or about October 1991.

9. Prior to the adoption of the JEDEC SDRAM standard in 1993, Rambus had no claims in any pending patent application that, if issued, would have necessarily been infringed by the manufacture or use of any device manufactured in accordance with the 1993 JEDEC SDRAM standard.

10. As of January 1996, Rambus held no issued U.S. patents that were essential to the manufacture or use of any device manufactured in compliance with any JEDEC standard.

11. In September 1993, Rambus disclosed its first issued patent to JEDEC during a committee meeting. This patent, U.S. Patent Number 5,243,703 ('703 patent), resulted from a divisional application of an original application, Serial No. 07/510,898 ('898 application), filed in April 1990.

12. After leaving JEDEC, Rambus filed more divisional and continuation applications claiming priority to the '898 application.

13. At least 43 United States Patents have been issued to Rambus from continuation and divisional applications claiming priority to the original '898 application.

14. In August 2000, Rambus sued Infineon, a manufacturer of semiconductor memory devices (including SDRAM and DDR SDRAM devices) and a member of JEDEC, for infringement of certain claims of the following U.S. patents: 5,954,804 ('804 patent); 5,953,263 (the '263 patent), 7,034,918 (the '918 patent), and the 6,032,214 ('214 patent).

15. These four patents (the '804 patent, the '263 patent, the '918 patent, and the '214 patent) each claim priority to the '898 application, and the written description of each is substantially identical to that of the '898 application.

16. In its suit against Infineon, Rambus alleged infringement of 56 claims in these four patents.

17. The JEDEC JC-42.3 Subcommittee attempts to establish standards for random

Respectfully submitted,

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DATED: April 23, 2003

COUNSEL SUPPORTING THE  
RESPONDENT

APPROVED: April \_\_, 2003

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Hon. Stephen McGuire  
Chief Administrative Law Judge

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**CERTIFICATE OF SERVICE**

I, Charlotte Manning, hereby certify that on April 23, 2003, I caused a true and correct copy of the Public Version of *The Parties First Set of Stipulations* to be served upon the following persons by hand delivery