

**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 IN LIMINE TO EXCLUDE CERTAIN
TESTIMONY OF MICHAEL GEILHUFÉ**

Respondent Rambus, Inc. (“Rambus”) has proffered Michael Geilhufe to testify to, among other areas, his estimates of changes in DRAM cost caused by the hypothetical use in DRAM of technologies proposed by Complaint Counsel’s technical expert Professor Bruce Jacob. Professor Jacob proposed the technologies as alternatives to the technologies claimed by Rambus. Complaint Counsel respectfully submits this Motion in Limine to exclude testimony by Mr. Geilhufe of these cost estimates.

As described more fully in the attached Memorandum in Support of this Motion, the estimates are unaccompanied by any indicia of reliability. Mr. Geilhufe provides no factual support for his opinions regarding the cost impact of the alternatives other than his experience and a few undocumented inquiries to often unnamed suppliers. Despite the fact that his experience is largely two decades removed from this action, Mr. Geilhufe provides no explanation how his experience relates to the costs that he estimates other than *ipse dixit*. In addition, Mr. Geilhufe, in his report, provides no explanation of the

methodologies, principles, or theories that connect the facts as he understands them to the conclusions he makes.

Respectfully submitted,

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Dated: 3/26/2003