

asked him numerous questions about the purported requirements of the JEDEC patent policy in the 1990's and whether certain presentations at JEDEC meetings did or did not trigger a disclosure obligation on the part of JEDEC members. Infineon's counsel made no effort to lay a foundation for testimony in this area, and he showed Mr.

Complaint Counsel then showed Mr. Brown the JEDEC Manual, 21-I (in evidence as ex. CX 208), asked him to read the portion relating to intellectual property, and then asked:

“Now, for a first presentation, if the company representative is aware of a patent application that his or her company has that might relate to the first presentation, is that company representative required to disclose that information?”

A. I believe, according to the policy that I read, he is not.”

Id., p. 63:16-23 (attached). Mr.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

_____)	
In the Matter of)	
)	Docket No. 9302
RAMBUS INC.,)	
a corporation,)	
_____)	

CERTIFICATION

I, James M. Berry, hereby certify that the electronic copy of *Respondent Rambus Inc.'s Memorandum In Support Of Certain Objections To Deposition Testimony By J. Reese Brown* accompanying this certification is a true and correct copy of the paper original and that a paper copy with an original signature is being filed with the Secretary of the Commission on May 13, 2003 by other means.

James M. Berry
May 13, 2003

**UNITED STATES OF AMERICA
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CERTIFICATE OF SERVICE

I, James M.