

document prior to preparing for his deposition. *See* Rambus's Memorandum in Support of Its Objections to the Deposition Testimony of Dr. K.H. Oh ("Memo."), at 2-5.

Attachment C lists all deposition excerpts designated by Complaint Counsel to which Rambus objects on the grounds that Dr. Oh did not recall the timing of Hyundai products but relied on a timeline prepared by his counsel. *See* Memo. at 5.

Attachment D lists all deposition excerpts designated by Complaint Counsel to which Rambus objects on other grounds.

In each of Attachments B, C, D, Rambus has listed the primary ground of its objections to each designated excerpt. Other objections to that testimony are indicated on the transcript which shows Complaint Counsel's designations, Rambus's objections and counter-designations, and Complaint Counsel's objections and counter-counter-designations. Should any issues remain unresolved after the parties have met and conferred, a copy of the transcript can be provided so as to enable Your Honor to rule on those issues.

DATED: May

Attachment A – Unobjectionable designations

Page and line

8:13 – 9:9

11:3 – 17:24

18:13 – 20:25

23:3 – 24:15

25:12-17

26:2-7

26:16-21

28:6-19

33:19 – 36:5

65:22 – 66:14

68:11-12

73:3-14

78:12-25

84:21 – 85:6

106:2-10

119:15-19

119:24 – 120:3

122:25 – 123:23

136:9-19

141:23 – 142:4

143:5 – 144:6

159:14-22

163:19 – 164:12

168:17 – 169:3

205:2-24

215:3-10

227:2-24

228:24 – 229:25

254:9-22

257:5 – 258:17

283:10-13

289:14-22

Attachment B

Page and line

Comments

39:13-21
41:9 – 43:15
45:4 – 46:4
47:11 – 48:20
51:4 – 52:5
53:10 – 54:13
55:2 – 56:14

198:20-23
203:21 – 205:1
Dr. Oh's testimony about the purpose and meaning of Exhibit 13 to his deposition lacks foundation because he had not seen the document prior to preparing for his deposition (248:18 – 250:4).

211:5-17
211:25 – 215:2
215:11 – 221:15
222:17 – 226:25
Dr. Oh's testimony about the purpose and meaning of Exhibit 14 to his deposition lacks foundation because he had not seen the document prior to preparing for his deposition (335:20 – 336:9).

Attachment C

Page and line

Comments

37:9 – 39:1

This testimony is based on the witness' prior testimony that Hyundai began work to design SDRAMs in November 1992 (see 36:22 – 37:8). However, the videotape of that prior testimony shows the witness consulting the timeline prepared by his counsel (21:8-19). Moreover, there is no foundation that Dr. Oh was familiar with the work of companies other than Hyundai.

343:1-23

Dr. Oh's testimony about the timing of events was based on the timeline prepared by his counsel. Moreover, there is no foundation for Dr. Oh's testimony about JEDEC standardization of DDR SDRAM.

Hyundai marketing manager who was also the chairman of the SyncLink consortium, to be privy to confidential Rambus information (114:25 – 115:9; 116:10-18; 322:16-22).

- 119:20-23 No foundation for Dr. Oh's testimony about the relationship of similarities between SDRAM and DDR SDRAM. Improper opinion testimony.
- 168:10-16 No foundation for testimony about testing by Hewlett-Packard.
- 227:25 – 228:19 Vague.
- 230:1 – 232:11 Dr. Oh's testimony about JEDEC and the possibilities of designing around Rambus's patents lacks foundation, is improper opinion testimony, and is more prejudicial than probative.
- 289:21 – 291:6 No foundation for Dr. Oh's testimony about the JEDEC patent policy.
- 354:23 – 356:11 No foundation for Dr. Oh's testimony about the license agreement with Rambus. Moreover, the questioning called for speculation and was leading.
- 356:12 – 357:13 Leading.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

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

CERTIFICATE OF SERVICE

I, James M. Bery, hereby certify that on May 14, 2003, I caused a true and correct copy of *Rambus's Supplemental Memorandum in Support of Its Objections to the Deposition Testimony of Dr. K.H. Ohreby certif Tc 0.0025. K.Hufdrvtruo Mattefo Tc () Tj -219.96 -owing persstim4, h -29deliv on:8 T*

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