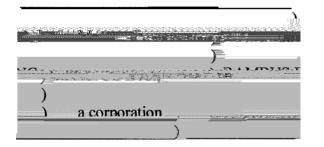
PUBLIC

UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION



Docket No. 9302

DECLARATION OF ROBERT DONNELLY

, Robert Donnelly, based upon my personal knowledge concerning matters to which I am competent to testify, hereby declare as follows:

1. I am Vice President of the Computing and Consumer Group at Micron Technology, Inc. ("Micron").

2. Micron is not a party to the captioned matter.

3. understand that Rambus Inc. ("Rambus") seeks to permit Rambus's chief executive officer, three of its in-house attorneys, and two members of its board of directors to have access to particular documents that Micron has designated under the Protective Order in this matter and for which Micron sought and obtained in camera t_{CATEP}

4. have reviewed the documents that I understand to be in dispute. Based upon my review of these documents, my knowledge of Micron's business, and my familiarity with the confidentiality protection that Micron affords documents of this type,

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it is my belief that disclosure of these documents on the terms Rambus has requested would likely cause substantial commercial harm or embarrassment to Micron.

5. Many of the documents that Rambus seeks to disclose to Rambus personnel (MFTC200502-35, MFTC10000229, MFTC211248-58, MFTC211238-44, MFTC228549-51) are highly sensitive, non-public technical, marketing, planning, and forward locking documents concerning the Advanced DDAM Technology (or "ADT") group. ADT is a research collaboration of which Micron is one of several members. ADT was formed to develop advanced DRAM technology. It is my understanding that ADT members are bound by agreement to maintain confidentiality of ADT's technical information and that its members disseminate such information on a need to know basis. Information about product development, features, marketing strategies, and similar information contained in these documents is highly sensitive. If Rambus had this information, it might try to incorporate desirable features of the ADT design into its own product design. Moreover, if this information about ADT were known to Rambus. Rambus had this information, it likely would lead to substantial commercial harm to Micron. Armed with this information, Rambus could seek to disrupt or derail Micron's collaborative efforts with this customer. Moreover, disclosure of this type of information could undermine Micron's relationship with this or other customers. If information disclosed to Micron in confidence by its customers is disclosed to others, customers will be reluctant to share sensitive information with Micron. This would put Micron at a

7. Four of the documents that Rambus seeks to disclose to Rambus personnel

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Micron at a competitive disadvantage compared to other suppliers. Moreover, because the documents were written with an understanding of confidentiality, they include embarrassing off-hand remarks. I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and correct. Executed this $\mathbb{Z}\mathscr{G}$ day of May, 2003 in Boise, Idaho.

Talut Jamil

Robert Donnelly

Micron Technology, Inc.