



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 looking documents concerning the Advanced DRAM 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

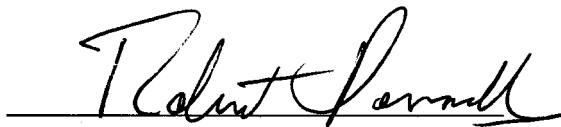
substantial commercial harm to Micron.

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

are confidential documents containing trade secrets of Micron.

~~If information disclosed to Micron in confidence by its customers is disclosed to other customers will be reluctant to share sensitive information with Micron. This would put 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 29 day of May, 2003 in Boise, Idaho.

A handwritten signature in black ink, appearing to read "Robert Donnelly", is written over a horizontal line.

Robert Donnelly

Micron Technology, Inc.  
Boise, Idaho