UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

RAMBUS INC.,

Docket No. 9302

a corporation.

RESPONSE BY RAMBUS INC. TO COMPLAINT COUNSEL'S REQUEST FOR CLARIFICATION OF THE GROUNDS FOR EXCLUDING CERTAIN DEPOSITION TESTIMONY OF J. REESE BROWN

On July 9, 2003, Complaint Counsel filed a "Request for Clarification of

the Grounds for Excluding Certain Deposition Testimony of J. Reese Brown."

The Request for Clarification is unnecessary and should be denied.

Your Honor previously upheld Rambus's foundation objections to certain

portions of Mr. Brown's deposition testimony. Now, as partiof 48 and vis '0.00 ERE -0.RE

Because the proposed deposition testimony has not been objected to by either party, there is no need for the Court to entertain Complaint Counsel's motion. The motion should be denied.

DATED: July 10, 2003

Respectfully submitted,

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Attorneys for Respondent Rambus Inc.

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CERTIFICATE OF SERVICE

I, James M. Berry, hereby certify that on July 10, 2003, I caused a true and correct copy of *Response By Rambus Inc. To Complaint Counsel's Request For Clarification Of The Grounds For Excluding Certain Deposition Testimony Of J. Reese Brown* to be served on the following persons by hand delivery:

Hon. Stephen J. McGuire Chief Administrative Law Judge Federal Trade Commission, Room H-112 600 Pennsylvania Avenue, N.W. Washington, D.C. 20580

Donald S. Clark, Secretary Federal Trade Commission, Room H-159 600 Pennsylvania Avenue, N.W. Washington, D.C. 20580

Richard B. Dagen, Esq. Assistant Director, Bureau of Competition Federal Trade Commission 601 New Jersey Avenue, N.W. Washington, D.C. 20001 M. Sean Royall, Esq. Deputy Director, Bureau of Competition Federal Trade Commission, Room H-372 600 Pennsylvania Avenue, N.W. Washington, D.C. 20580

Malcolm L. Catt, Esq. Attorney Federal Trade Commission 601 New Jersey Avenue, N.W. Washington, D.C. 20001

James M. Berry