

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

PUBLIC

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

**COMPLAINT COUNSEL’S MEMORANDUM IN SUPPORT OF ITS OFFER OF
PROOF REGARDING THE DESIGNATED TESTIMONY FROM RAMBUS’
CHIEF EXECUTIVE OFFICER, GEOFFREY TATE, AND THE CHAIRMAN OF
ITS BOARD OF DIRECTORS, WILLIAM DAVIDOW**

Complaint Counsel submits, as an offer of proof, the accompanying designations of deposition testimony for entry into the record of this proceeding. These designations were excluded pursuant to a bench ruling on July 29, 2003. Trial - Vol. 52, (Pages 10923:22 to 10924:6). Pursuant to Commission Rule 3.43(g) the testimony that is barred may be entered into the record through an offer. *See* 16 C.F.R. § 3.43(g). Accordingly, Complaint Counsel requests that these designations be accepted into the record and reported in full, subject to the objection upon which they were excluded. Tab A contains the excluded designations from the deposition of Rambus’ Chief Executive Officer (“CEO”),

Geoffrey Tate. Tab B contains the excluded designations from the depositions of Rambus' Chairman of the Board ("Chairman"), William Davidow.

DATED: August 1, 2003

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Charlotte Manning, hereby certify that on August 1, 2003, I caused a true and correct copy of the Public Version of *Complaint Counsel's Memorandum in Support of its Offer of Proof Regarding the Designated Testimony From Rambus' Chief Executive Officer, Geoffrey Tate, and the Chairman of its Board of Directors, William Davidow* to be served upon the following persons by hand delivery:

Hon. Stephen McGuire
Chief Administrative Law Judge
Federal Trade Commission

Donald S. Clark
Secretary
Federal Trade Commission

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