

PUBLIC

**UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION**

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

**RESPONDENT RAMBUS INC.'S OPPOSITION TO NON-PARTY
HYNIX'S MOTION TO AMEND THE PROTECTIVE ORDER**

In an effort to obtain access to *in camera* testimony provided by others, including their competitors such as Micron, non-parties Hynix Semiconductor, Inc., Hynix Semiconductor America Inc., Hynix Semiconductor U.K. Ltd., and Hynix Semiconductor Deutschland GmbH (collectively, “Hynix”) have moved this Court to amend the August 5, 2002 Protective Order to permit the disclosure of *in camera* testimony taken in this proceeding. Hynix’s motion must be denied.

First, the August 5, 2002 Protective Order, which Hynix seeks to amend, does not govern the taking of *in camera* testimony. Rather, the protection accorded to testimony taken *in camera* is set forth in the Commission’s Rules of Practice § 3.45, 16 C.F.R. § 3.45, and in *in camera* Orders entered by this Court in advance o

DATED: August 13, 2003

Respectfully submitted,

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CERTIFICATION

I, Rebecca A. Williams, hereby certify that the electronic copy of *Respondent Rambus, Inc.'s Opposition to Non-Party Hynix's Motion to Amend the Protective Order* accompanying this certification is a true and correct copy of the paper version that is being filed with the Secretary of the Commission on August 13, 2003 by other means.

Rebecca A. Williams
August 13, 2003