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July 16, 2003  
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exhibits entered into evidence (exhibits too are being entered on an ongoing basis). Thus, we will adhere to the same procedures for both, as discussed immediately below.

2. In Camera FTC testimony. Your July 14 letter references a proposed amendment

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5. Micron and Infineon Pleadings. As mentioned several times previously, this request has had to wait in line behind your request for the FTC materials. We are currently on track to produce what remains to be produced by July 31. Your June 30, 2003 proposed stipulation seems fine, except that it omits our agreement to treat all expert reports whether those of Rambus's experts or those of Micron's experts under the terms of the Micron protective order, as we discussed on May 14. Please make this change and forward to Mr. Stoffelmayr so that we can have it entered with the Court prior to the production.

6. Pre-1996 Privileged Documents. At the May 14 meeting, we asked that you provide us with a list of the documents in your possession that you believe to fall within this category so that we could ascertain what has been produced to you (this occurred, as you may

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[REDACTED]

[REDACTED]

[REDACTED]

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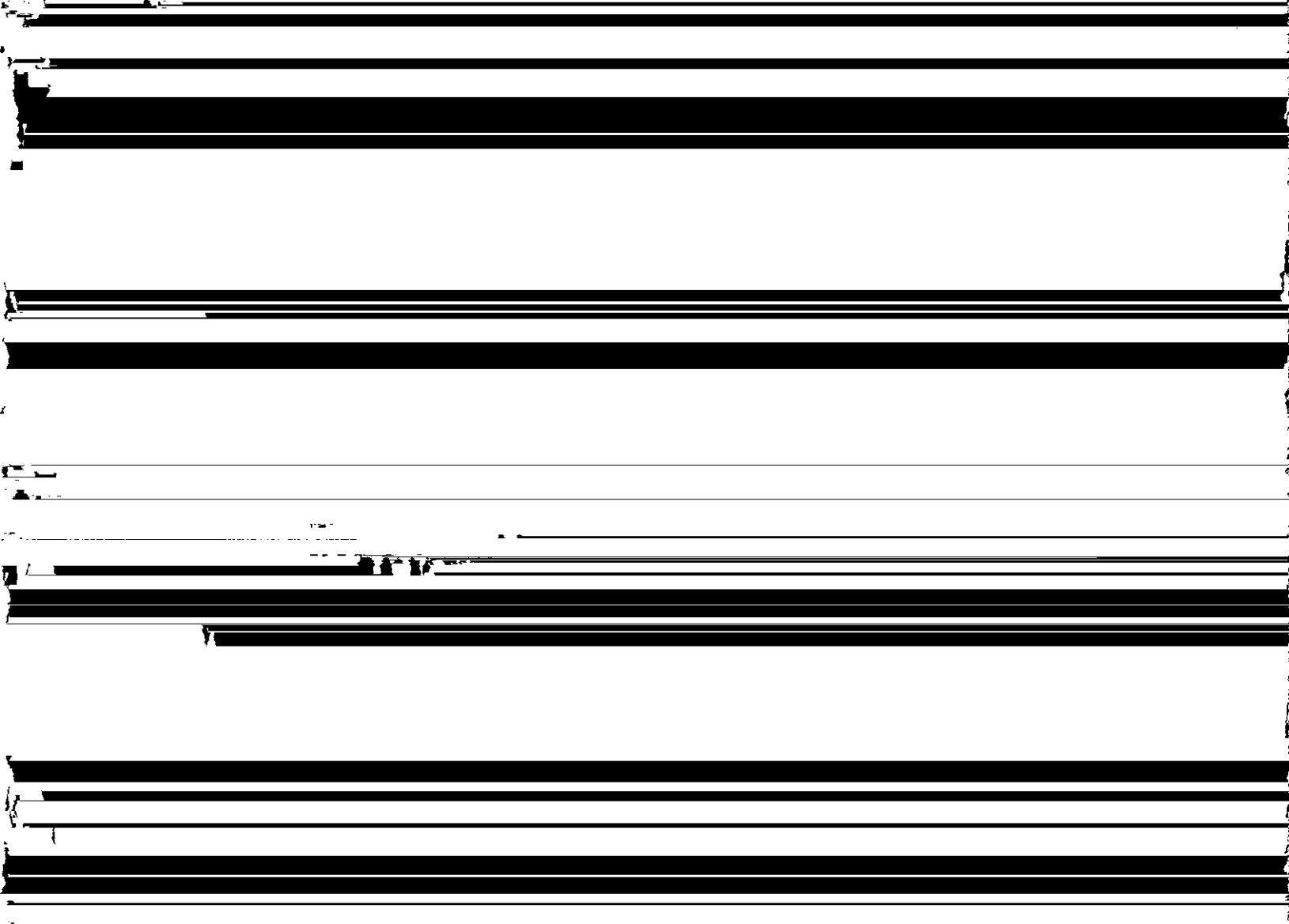
Geoffrey H. Yost  
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August 4, 2003

**VIA FACSIMILE**

Andrea W. Jeffries, Esq.  
Munger, Tolles & Olson LLP  
355 South Grand Avenue, 35th Floor  
Los Angeles, CA 91107

Re: [Redacted]



Andrea W. Jeffries, Esq.

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**Thelen Reid & Priest LLP**

REDACTED Thank you for explaining the

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Of course, counsel for Hynix has been unable to open these e-mails and attachments, so we do not know whether their contents are privileged or even discoverable. As such, it would be inappropriate for Rambus to receive electronic copies of these documents and attempt to open them when counsel for Hynix has had no opportunity to screen them for relevance and privilege.

We therefore propose that Hynix produce to Rambus electronic copies of the e-mails and

Andrea W. Jeffries, Esq.  
August 4, 2003

**Thelen Reid & Priest LLP**

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[REDACTED]

[REDACTED]

[REDACTED]



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August 7, 2003  
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documents that post date the filing of the Complaint in the FTC proceeding, and will get back to you shortly. However, insofar as communications that may involve settlement, we do not see how the request is reasonably calculated to lead to the discovery of admissible evidence, given that any settlement

communications (if they exist) would not be admissible in this case. Accordingly, while we will consider the other aspects of the request, we will not produce any