## UNITED STATES OF AMERICA BEFORE THE FEDERAL TRADE COMMISSION

In the matter of

**RAMBUS INC.,** 

Docket No. 9302

a corporation.

### JOINT WITNESS INDEX PURSUANT TO 16 C.F.R. § 3.46

Pursuant to 16 C.F.R. § 3.46, the parties submit this Joint Witness Index.

### I. <u>WITNESSES CALLED BY COMPLAINT COUNSEL</u>

Steven Appleton is the Chairman of the Board of Directors, Chief Executive
 Officer and President of Micron Technology, Inc. Mr. Appleton has been with Micron since
 1991. He testified on June 20, 2003 (Tr. 6252-6549 (Public); 6555-6575 (in camera)).

2. Andy Bechtolsheim is Vice President and General Manager of Gigabit Systems at Cisco Systems, Inc. He co-founded Sun Microsystems, a company that builds UNIX servers and workstations and was Vice President of Technology. He also founded Granite Systems, a developer of gigabit switching products. He testified on June 18, 2003 (Tr. 5736-5977).

3. Henry Becker is Vice President and Managing Director of Infineon Technologies Richmond. Mr. Becker is in charge of the operations of Infineon's DRAM manufacturing plant in Richmond. He testified on May, 7 2003 (Tr. 1093-1185). Sam Calvin was a Senior Staff Electrical Engineer at Intel Corporation. Mr.
 Calvin was a representative for Intel at JEDEC meetings from 1992-1997. He testified on May 6, 2003 (Tr. 988-1076).

Richard Crisp is an engineer who was Technology and Business Development
 Manager of the Asia-Pacific Region at Rambus Inc. Mr. Crisp was the primary Rambus
 representative at JEDEC JC 42.3 meetings from May 1992 until Rambus withdrew from JEDEC.
 He testified on May 27, 28, and 29, 2003 (Tr. 2910-3606; see also CC's August 8, 2003 filing of
 "The Parties' Designated Deposition Testimony").

 Anthony Diepenbrock joined Rambus as an in-house lawyer in September 1995 and remained until May 1999. He is now Of Counsel at Dechert LLP. He testified on June 19, 2003 (Tr. 6097-6238).

7. Bob Goodman is Chief Executive Officer of Kentron Technologies, Inc, a company that provides memory solutions. He testified on June 19, 2003 (Tr. 5988-6040).

8. Jackie Gross is Director of Memory Central Direct Procurement at Hewlett-Packard Company. Ms. Gross was formerly the head of memory procurement, including DRAM, at Compaq. She supervised Compaq's JEDEC representative and is currently the supervisor of Hewlett-Packard's JEDEC representative. She testified on May 20, 2003 (Tr. 2264-2369).

9. Richard Heye is Vice President and General Manager of Platform Engineering & Infrastructure at Advanced Micro Devices, Inc, a company that makes and sells microprocessors and flash memory. He testified on May 30, 2003 (Tr. 3614-3817).

10. Bruce L. Jacob is an Associate Professor of Department of Electrical & Computer Engineering at the University of Maryland. He testified on June 16 and 17, 2003 and on July 30,

## 2003 (Tr. 5352-5680; 11099-11150).

11. Joel Karp was the Vice-President of Intellectual Property at Rambus, Inc. in the

Hewlett-Packard from 1994-1999 and served on the JEDEC Council from 1998-1999. He testified on May 13, 2003 (Tr. 1675-1725).

17. Terry Lee is the Executive Director of Advanced Technology and Strategic Marketing at Micron Technology, Inc. He was also a JEDEC participant for Micron from 1994-2002. He testified on June 23 and 24, 2003 and on July 30, 2003 (Tr. 6585-7052; 10995-11098 (Public); 7058-7091; 11161-11182 (in camera)).

18. Joe Macri is Director of Technology at ATI Technologies, Inc, a company that provides graphics design to the computer industry. Mr. Macri has been a representative to JEDEC since 1997, presided as the former Chairman of the Future DRAM Task Group, and is the current chairman of JEDEC subcommittee JC-42.3. He testified on June 9, 2003 (Tr. 4569-4740 (Public); 4749-4788 (in camera)).

19. Pete MacWilliams is a Senior Fellow at Intel Corporation, and is also Director of Platform Architecture. He testified on June 12, 2003 (Tr. 4796-4981 (Public); 5069-5081 (in camera)).

20. Preston McAfee is the Murray Johnson Professor of Economics at the University of Texas, Austin. He testified on June 25, 26, and 27, 2003 and on August 1, 2003 (Tr.7110-7782; 11196-11380 (Public); 7621-7663; 7823-7869 (in camera)).

21. Willi Meyer is the Manager of Technical Marketing for Memory Products at Infineon AG. He was a JEDEC representative for Siemens, then later for Infineon since 1985 and acted as the primary representative for many years. He testified (via deposition) on May 22, 2003 (Tr. 2857-2902).

22. Mark E. Nusbaum was an Examiner in Chief at the Patent and Trademark Office and is currently a patent attorney with Nixon and Vanderhye, P.C. law firm, resident in the firm's

JEDEC. He testified on May 8, 2003 (Tr. 1313-1473).

30. Lester Vincent is a Partner at Blakely, Sokoloff, Taylor & Zafman, resident in the firm's Sunnyvale, California office. He served as Rambus's outside patent counsel for much of the 1990s. He testified (via deposition) on May 19, 2003 and (live) on June 30, 2003 (Tr. 2186-2258; 7875-7999 (Public); 8045-8049 (in camera)).

31. Barry Wagner is Manager of Technical Marketing at nVIDIA Corporation, a designer and manufacturer of graphics processors and chipsets. Mr. Wager has been a representative of nVIDIA in JEDEC meetings. He testified on May 30, 2003 (Tr. 3820-3877).

32. Brett Williams is a Strategic Marketing Manager for Desktop Systems at Micron Technology, Inc. Mr. Williams was a representative of Micron in JEDEC meetings from 1991-1993. He testified on May 5, 2003 (Tr. 757-975).

#### II. WITNESSES CALLED BY RESPONDENTS

1. Reese Brown is a retired engineer who attended JEDEC meetings as a consultant to JEDEC in the 1990's. He testified (via deposition) on July 28, 2003.

2. Samuel Chen was Mitsubishi's JEDEC representative throughout the 1990's. He testified (via deposition) on July 14, 2003. (Tr. 8736:24-8746:8).

3. Mike Farmwald is one of Rambus's founders and is a member of its Board of Directors. He testified on July 9, 2003 and July 10, 2003. (Tr. 8057:2-8355:4; 8361:17-8472:12; see also CC's August 8, 2003 filing of "The Parties' Designated Deposition Testimony").

4.

Michael Geilhufe is a consultant and retired Intel executive. He testified on July
 21, 2003. (Tr. 9541:23-9746:20).

6. Alan Grossmeier is an engineer at Cray, Inc. He has served as Cray's JEDEC representative since 1989. He testified on July 29, 2003. (Tr. 10929:22-10984:14).

David Gustavson was the Secretary of the SyncLink Consortium in the mid-1990's who attended and took minutes of numerous SyncLink meetings. He testified on July 17, 2003.
 (Tr. 9277:8-9318:17).

Craig Hampel is Rambus's Technical Director. He testified on July 14, 2003.
 (Tr. 8672:8-8735:11 (Public); 8752:3-8755:23 (in camera)).

9. Tr. 10929:28410954:1850:4;9:2891:104:1409.

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representative sincj .Shtified on July 17, 2063. (Tr. 109298967:16-9030.

York at Stony Brook. He testified on July 22 and 23, 2003. (Tr. 9763:9-10018:3; 10026:2-10266:3).

14. Dr. Donald Soderman is a consultant and retired executive in the semiconductor industry. He testified on July 18, 2003 (Tr. 9327:4-9519:16 (Public); 9524:5-9532:17 (in camera)).

15. David Teece is Chairman of LECG, an economic consulting firm, who is also a Professor at the Haas School of Business at the University of California, Berkeley. He testified on July 24, 2003 (Tr. 10294:11-10526:18 (Public); 10532:5-10569:16 (in camera)).

16. Farhad Tabrizi is Vice President of Worldwide Marketing of Memory Products at Hynix Semiconductor Inc. Mr. Tabrizi was a representative of Hynix (and its predecessors) in JEDEC meetings. Mr. Tabrizi was chairman of the SyncLink Consortium. He testified on July 16, 2003 (Tr. 9031:8-9229:24).

17. Hans Wiggers was a JEDEC representative on behalf of Hewlett-Packard during much of the 1990's. He was also a member of the JEDEC Council. He testified on July 25, 2003. (Tr. 10576:3-10608:8).

# III. DESIGNATIONS SUBMITTED INTO THE RECORD IN WRITTEN FORM

1. William Davidow is the Chairman of the Board of Directors at Rambus, Inc. His deposition designations were submitted into the record on August 8, 2003 (The Parties'

Deposition Testimony).

3. David Mooring is the President and Director of Rambus, Inc. His deposition designations were submitted into the record on August 8, 2003 (The Parties' Designated Deposition Testimony).

4. Geoffrey Tate is the Chief Executive Officer at Rambus, Inc. His deposition designations were submitted into the record on August 8, 2003 (The Parties' Designated Deposition Testimony).

 Fred Ware is a Principal Engineer at Rambus, Inc. His deposition designations were submitted into the record on August 8, 2003 (The Parties' Designated Deposition Testimony).

Counsel for Rambus has consented to the filing of this Joint Witness Index as required by 16 C.F.R. § 3.46, Proposed findings, conclusions, and order; and to Complaint Counsel's representation that Rambus concurs in all respects with the proposed order attached hereto. DATED: September 5, 2003

M. Sean Royall Geoffrey D. Oliver Patrick J. Roach

BUREAU OF COMPETITION FEDERAL TRADE COMMISSION

## **CERTIFICATE OF SERVICE**

I, Emily Pitlick, hereby certify that on September 5, 2003, I caused a copy of the following materials:

1. Joint Witness Index Pursuant to 16 C.F.R. § 3.4611 CERTIFICAT