UNITED STATES OF AMERICA BEFORE FEDERAL TRADE COMMISSION

COMMISSIONERS:	Timothy J. Muris, Chairman Mozelle W. Thompson Orson Swindle
	Thomas B. Leary Pamela Jones Harbour
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In the Matter of

RAMBUS, INCORPORATED, a corporation.

Docket No. 9302

ORDER GRANTING EXTENSIONS OF TIME TO FILE APPELLATE BRIEFS AND INCREASES IN WORD COUNT LIMITS

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Respondents and Counsel Supporting the Complaint have filed a Joint Motion for Extensions of Time and Word Count Limits Throughout the Appellate Briefing Schedule in this matter, to accommodate their respective briefs on appeal from the Initial Decision and Order filed by Administrative Law Stephen J. McGuire. Judge McGuire filed his Initial Decision and Order in this matter on February 23, 2004. Counsel Supporting the Complaint were formally served with the Initial Decision on February 26, 2004, and filed a timely Notice of Appeal on March 1, 2004; are deemed the appellants; and therefore currently must file their initial appeal brief on or before March 29, 2004. Respondent was formally served with the Initial Decision on March 1, 2004; filed a timely Notice of Appeal on March 9, 2004; and is deemed the appellee and cross-appellant. Commission Rule 3.52(g), 16 C.F.R. § 3.52(g) (2004).

The parties request that the briefing schedule be modified to prescribe the deadlines in parentheses: the Appeal Brief (April 16, 2004); the Answering and Cross-Appeal Brief (June 2, 2004); the Reply Brief, if a cross-appeal is not perfected¹ (June 16, 2004); the Reply Brief, if a cross-appeal is perfected (July 2, 2004); and the Rebuttal Brief, if a cross-appeal is perfected (July 16, 2004). The parties also request certain increases in the word limits for these briefs.

The Commission has determined to grant the Joint Motion. The time periods and word limits prescribed by the Commission Rules of Practice should afford parties to FTC proceedings sufficient time and space to file pleadings and briefs of sufficient quality and detail to aid in the preparation of Commission opinions and orders. We are therefore reluctant either to extend the briefing periods or to increase the word limits beyond those prescribed by the Rules of Practice.

¹ For purposes of this Order, Respondent's cross-appeal is deemed to have been perfected if its Answering Brief contains "its arguments as to any issues [the Respondent] is raising on cross-appeal . . ." Commission Rule 3.52(c), 16 C.F.R. § 3.52(c).