

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

IN THE MATTER OF
RAMBUS INCORPORATED.

DOCKET NO. 9302

**MOTION OF
MICRON TECHNOLOGY, INC.,
HYNIX SEMICONDUCTOR, INC,
AND INFINEON TECHNOLOGIES AG
FOR LEAVE TO FILE BRIEF AS AMICI CURIAE**

[PUBLIC]

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Pursuant to 16 C.F.R. § 3.52(j), Micron Technology, Inc. (“Micron”), Hynix Semiconductor, Inc. (“Hynix”), and Infineon Technologies AG (“Infineon”) respectfully move for leave to file a brief as amici curiae in this matter.

Micron, Hynix, and Infineon (collectively “Amici”) are global leaders in the design, manufacture, and sale of semiconductor devices, including dynamic random access memory (“DRAM”). DRAMs are used in computing, networking, and

contrary to the Administrative Law Judge's findings, Rambus knowingly and deceptively violated the intellectual property disclosure rules of JEDEC with the specific intent to secure a monopoly over certain DRAM technologies. Rambus secretly tailored its patent claims to cover the work of JEDEC, concealed its patent claims while it was a member of JEDEC, and even withdrew from JEDEC to avoid revealing its patent claims to JEDEC.

Now years later, after Amici and other JEDEC participants have invested heavily in the claimed technologies, Rambus asserts that its patent rights cover the SDRAM and DDR SDRAM standards. Rambus conduct threatens unjustly to expose Amici and other DRAM industry participants to billions of dollars of lost sales from concealed

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