

addressed by Complaint Counsel in their brief are not within Complaint Counsel's personal knowledge, Complaint Counsel have not in all respects accurately portrayed those facts.

Rambus requests leave to file a response to Complaint Counsel's brief in order to respond to the new arguments advanced by Complaint Counsel in their brief and not previously addressed by Rambus, and to correct certain factual omissions or errors in Complaint Counsel's description of events.

A copy of Rambus's proposed response and supporting Appendix of exhibits are filed concurrently herewith.

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Gregory P. Stone
Steven M. Perry
Peter A. Detre
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue, 35th Floor
Los Angeles, California 90071-1560
(213) 683-9100

A. Douglas Melamed
Kenneth A. Bamberger
WILMER CUTLER PICKERING
HALE AND DORR LLP
2445 M Street, N.W.
Washington, D.C. 20037
(202) 663-6000

John M. Guaragna

