

PUBLIC

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UNITED STATES FEDERAL TRADE COMMISSION



[REDACTED]

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In the Matter of  
RAMBUS INC.,  
A CORPORATION

Broadcom Corporation (“Broadcom”) and Freescale Semiconductor, Inc.

(“Freescale”) respectfully move under 16 C.F.R. § 3.52(j) for leave to file a brief as

and the Commission’s remedy decision in this matter will have

substantial impact on their businesses. The proposed brief would assist the Commission in determining the appropriate remedy and inform the Commission about how the remedy

that the rules and procedures of SSOs, including JEDEC, are followed and respected, particularly those that relate to the incorporation of proprietary technology into important standards like the JEDEC SDRAM standards. Moreover, Broadcom and Freescale are direct victims of the “hold up” orchestrated by Rambus and found by the Commission to violate Section 5 of the FTC Act. Broadcom and Freescale, along with dozens of other companies, are among the OEMs and manufacturers of complementary components that the Commission expressly recognized to be “locked in” to the markets now monopolized

Indeed, Rambus already has asserted the Rambus JEDEC Patents against Broadcom and

September 15, 2006

Respectfully submitted,



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Broadcom Corporation

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FEDERAL TRADE COMMISSION

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Docket No. 9302

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In the Matter of

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A CORPORATION

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**PROPOSED ORDER**

Upon consideration of the Motion of Broadcom Corporation

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CERTIFICATE OF SERVICE

I, Elizabeth A. Thomas, hereby certify that on September 15, 2006, I caused a true and correct

copy of the attached joint motion of *amicus curiae* Broadcom Corporation and Freescale Semiconductor, Inc. to file a brief as *amicus curiae* under 16 C.F.R. 3.52(i) to be served on the

following persons: