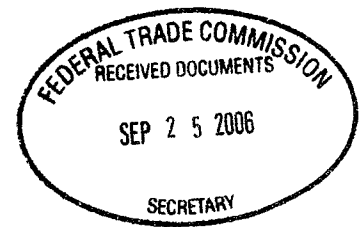


PUBLIC

BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: Deborah Platt Majoras, Chairman  
Pamela Jones Harbour  
Jon Leibowitz  
William E. Kovacic  
J. Thomas Rosch



I. INTRODUCTION

Respondent Rambus, Inc. ("Rambus") requests the Commission to grant its motion for

opposition to the motion by NVIDIA Corporation, Micron Technology, Inc., Samsung Electronics Corporation, Ltd. and Hynix Semiconductor, Inc. (hereinafter collectively the "Certain Manufacturers") for leave to file a brief as "amici curiae" in connection with the remedy phase of this proceeding.

The Commission should deny the motion. The Certain Manufacturers' brief is largely devoted to an improper effort to re-argue liability issues, to a misleading and incomplete summary of the Commission's July 31, 2006 Opinion ("Comm'n Op."), and to

arguments that mirror those in Complaint Counsel's own brief. As Judge Posner explained

II. ARGUMENT

A. The Certain Manufacturers' Brief Improperly Seeks To Re-Argue

Liability Issues And To Obtain New And Different Liability Findings

[REDACTED]

Commission's Opinion.<sup>2</sup> Rambus notes in this regard that the Commission did not make  
the types of underlining findings with respect to the additional technologies identified.

the Certain Manufacturers that it made with respect to the "four relevant product markets,"  
such as the existence (or non-existence) of alternative technologies or the existence (or  
non-existence) of "lock-in." *See, e.g.,* Comm'n Op. at 82-95. Moreover, when the  
Commission rejected as irrelevant some of the evidence relied upon by the AT I











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**In the Matter of**

**RAMBUS INC.,**

**a corporation.**

**Docket No. 9302**

**CERTIFICATE OF SERVICE**

I, Helena T. Doerr, hereby certify that on September 25, 2006, I caused a true and correct copy of the *OPPOSITION BY RAMBUS INC. TO MOTION OF NVIDIA CORPORATION, MICRON TECHNOLOGY, INC., SAMSUNG ELECTRONICS*

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