

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

**Public Version**

In the Matter of

RAMBUS INCORPORATED,

a corporation.

Docket No. 9302

**COMPLAINT COUNSEL'S MOTION TO COMPEL AN ADDITIONAL DAY OF  
DEPOSITION TESTIMONY OF RICHARD CRISP**

Complaint Counsel respectfully seeks to compel an additional day of deposition testimony from Mr. Richard Crisp, Rambus's primary representative at JEDEC from early 1992 until Rambus withdrew from JEDEC in June 1996 and a key figure in Rambus's efforts to draft claims to be added to pending patent applications covering the work Mr. Crisp observed at JEDEC.

Complaint Counsel completed a single day of deposition questioning of Mr. Crisp on February 14, 2003. Complaint Counsel had previously informed counsel for Rambus, which also represents Mr. Crisp, that it thought more than one day of testimony would be necessary, but Rambus's counsel said it would limit the deposition to one day. Despite its best efforts, Complaint Counsel was unable to complete its questioning of Mr. Crisp in this time. Complaint Counsel has sought additional time to question Mr. Crisp, but Rambus's counsel has refused to make him available for any further questioning.

As explained more fully in Complaint Counsel's Memorandum in support of this motion, because of the importance of this matter, the central role of Mr. Crisp to the events in litigation here, the large volume of highly relevant documents that Rambus failed to produce until long after Mr. Crisp's final deposition in the private litigation, and the absence of any burden on Mr. Crisp in sitting for his prior depositions, Complaint Counsel respectfully request that Your Honor enter the attached Proposed Order.

Respectfully submitted,

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COUNSEL SUPPORTING THE  
COMPLAINT

Dated: February 21, 2003

