

UNITED STATES OF AMERICA
BEFORE FEDERAL TRADE COMMISSION

DOCKET NO. 9302

IN THE MATTER OF
RAMBUS INCORPORATED

MOTION OF
CITIZENS FOR VOLUNTARY TRADE
FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF
IN SUPPORT OF RAMBUS, INC.

[PUBLIC]

S.M. Oliva
President
Citizens for Voluntary Trade
Post Office Box 66
Arlington, VA 22210
(703) 740-8309

June 2, 2004

Citizens for Voluntary Trade (CVT) respectfully moves, under 16 C.F.R. § 3.52(j), for leave to file the accompanying *amicus curiae* brief in support of both Rambus, Inc. and Judge McGuire's Initial Decision.

CVT is a nonprofit, nonpartisan educational organization that applies free market principles and rational ethics to contemporary antitrust issues through filings with federal courts and agencies, policy papers, public commentaries, and a website (www.voluntarytrade.org). CVT scrutinizes the activities of the Federal Trade Commission and the Department of Justice which pertain to the enforcement of the antitrust laws. Since its founding in 2002, CVT and its officers have filed more than 20 formal comments and briefs in response to government antitrust cases.

CVT's Board of Trustees consists of individuals from across the country who have a broad range of business, legal, and public policy experience. Unlike other antitrust research organizations, none of CVT's board members belong to the professional antitrust bar, and consequently do not depend on the continued existence of the antitrust laws. CVT accepts no funding from any government agency.

CVT has no financial interest in Rambus, Inc. or in the outcome of this matter. However, several individuals identifying themselves as Rambus shareholders or supporters have made financial contributions to CVT. To date, CVT has received \$700 in such contributions, and has applied them to the costs of preparing and printing the accompanying *amicus curiae* brief. Based on information and belief, CVT states that no contributor as of the filing of this motion is an officer, counsel, or controlling shareholder of Rambus, Inc.

CVT and its supporters have a common interest in the systematic and consistent application of the United States Constitution and the principles of the Declaration of Independence. Expansion of the antitrust laws—particularly Section 5 of the Federal Trade Commission Act—

