

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

**Before The Honorable James P. Timony
Administrative Law Judge**



In the Matter of

RAMBUS INCORPORATED,

a corporation.

Docket No. 9302

**SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME
TO MOVE TO QUASH SUBPOENA**

Samsung Semiconductor Inc. ("Samsung"), a non-party to the above-captioned case, through undersigned counsel, files this second motion for a brief extension of time for Samsung to file a motion to quash Rambus Incorporated's Subpoena Duces Tecum, dated August 20, 2002 (the "Subpoena").

Rambus Incorporated ("Rambus") served Samsung with the Subpoena on October 1, 2002. Under the applicable procedures, the time to file a motion to quash the Subpoena would have been October 11, 2002. Samsung filed its Unopposed Motion for Extension of Time to Move to Quash Subpoena on October 11, 2002 seeking three (3) additional days to further negotiate with opposing counsel concerning the scope of the Subpoena. October 14, 2002 was a Federal holiday. Therefore, pursuant to Federal Trade Commission Rules of Practice § 4.3(a), the present deadline for Samsung to file a motion to quash the Subpoena is October 15, 2002.

On October 11, 2002, counsel for Samsung and Rambus telephonically conferred in an attempt to resolve Samsung's complaints about the scope and burden of the Subpoena and other issues regarding the Subpoena. At the conclusion of the call, Rambus agreed to withdraw and/or

revise and timely resubmit certain broadly drafted document requests. Additionally, Samsung agreed to make a good faith effort to produce documents to Rambus' more narrowly tailored document requests and provide an initial privilege log by October 23, 2002.

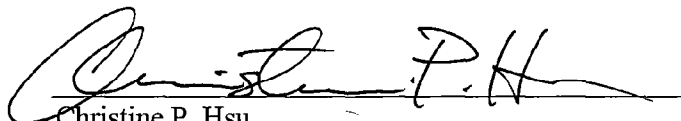
Samsung and Rambus have agreed to further extend the time for Samsung to file a motion to quash the Subpoena to October 31, 2002. The extension is not sought for delay, but only to allow for the resolution of this discovery dispute without litigation (if possible).

Counsel for the Federal Trade Commission do not oppose this extension.

Accordingly, Samsung requests that this motion be granted and that it be given until October 31, 2002 to file a motion to quash the Subpoena, without prejudice to seek a further extension of this deadline.

Dated: October 15, 2001

Respectfully submitted,



Christine P. Hsu
WEIL, GOTSHAL & MANGES LLP
1501 K Street NW, Suite 100
Washington, D.C. 20005
Telephone: (202) 682-7000
Fax: (202) 857-0940

and

David Healey
Anita Kadala
WEIL GOTSHAL & MANGES LLP
700 Louisiana, Suite 1600
Houston, TX 77002
Telephone: (713) 546-5000
Fax: (713) 224-9511

CERTIFICATE OF SERVICE

It is hereby certified that copies of the foregoing were served this 15th day of October,

2002, on the following:


The Honorable James P. Timony (By Hand)
Administrative Law Judge
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580

Richard B. Dagen (By Hand)
Assistant Director
Bureau of Competition
Federal Trade Commission
601 New Jersey, NW, Room 6223
Washington, D.C. 20850

Malcolm L. Catt (By Hand)
Robert P. Davis
Federal Trade Commission
600 Pennsylvania Ave., N.W.
Washington, D.C. 20580

Counsel for Rambus Incorporated

Truc-Linh N. Nguyen (By Facsimile)
Munger, Tolles & Olson LLP
355 South Grand Avenue
Los Angeles, CA 90071-1560


Christine P. Hsu

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

**Before The Honorable James P. Timony
Administrative Law Judge**

In the Matter of

RAMBUS INCORPORATED,

a corporation.

Docket No. 9302

ORDER

Upon consideration of the Second Unopposed Extension of Time to Move to Quash Subpoena, filed in the above-captioned matter on October 15, 2002 by Samsung Semiconductor, Inc. ("Samsung"), it is hereby ordered that Samsung shall be given until October 31, 2002 to file a motion to quash, without prejudice to seek a further extension of this deadline.

The Honorable James P. Timony
Administrative Law Judge