

UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION



In the Matter of

RAMBUS INCORPORATED,  
  
a corporation.

Docket No. 9302

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PUBLIC RECORD  
VERSION OF COMPLAINT COUNSEL'S MOTION TO COMPEL DISCOVERY  
RELATING TO SUBJECT MATTERS AS TO WHICH RAMBUS'S PRIVILEGE  
CLAIMS WERE INVALIDATED ON CRIME-FRAUD GROUNDS AND  
SUBSEQUENTLY WAIVED**

On January 7, 2003, Complaint Counsel filed in this matter a Motion to Compel Discovery Relating to Subject Matters as to which Rambus's Privilege Claims were Invalidated on Crime-Fraud Grounds and Subsequently Waived ("Motion to Compel"). Pursuant to Title 16, Sections 3.22 and 3.45 of the Code of Federal Regulation, Complaint Counsel must file with the Commission's Secretary a public version of its Motion to Compel, and all supporting materials, within five (5) days after the original filing.

By this motion, which counsel for Respondent Rambus Inc. does not oppose, Complaint Counsel seeks an extension of time within which to file a public record version of its Motion to Compel. The reason for requesting such an extension of time relates to the fact that Complaint Counsel and Rambus's counsel are presently in the process of conferring, in good faith, to resolve questions relating to Rambus's prior designation of certain materials, cited by the Motion to Compel, as "confidential" pursuant to the Protective Order approved by Your Honor in this

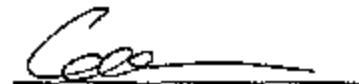
case.

Complaint Counsel has informed Respondent's counsel that it is Complaint Counsel's position that the Motion to Compel contains no confidential information and has given Respondent's counsel five days to respond. Complaint Counsel has further indicated to Rambus's counsel that Complaint Counsel is willing to discuss a schedule that would extend Rambus's counsel's time to respond. Therefore, until this is resolved, Complaint Counsel asks to be relieved of an obligation to file a public record version of the Motion to Compel.

Respondent's counsel does not oppose this motion.

Accordingly, Complaint Counsel requests that this motion be granted.

Respectfully submitted,



M. Sean Royall  
Geoffrey D. Oliver  
Alice W. Detwiler

BUREAU OF COMPETITION  
FEDERAL TRADE COMMISSION  
Washington, D.C. 20580  
(202) 326-3663  
(202) 326-3496 (facsimile)

COUNSEL SUPPORTING THE  
COMPLAINT

Dated: January 10, 2003

UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION

In the Matter of

RAMBUS INCORPORATED,

a corporation.

Docket No. 9302

**ORDER GRANTING  
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PUBLIC RECORD  
VERSION OF COMPLAINT COUNSEL'S MOTION TO COMPEL DISCOVERY  
RELATING TO SUBJECT MATTERS AS TO WHICH RAMBUS'S PRIVILEGE  
CLAIMS WERE INVALIDATED ON CRIME-FRAUD GROUNDS AND  
SUBSEQUENTLY WAIVED**

Upon consideration of Complaint Counsel's Unopposed Motion for Extension of Time to File Public Record Version of Complaint Counsel's Motion to Compel Discovery Relating to Subject Matters as to which Rambus's Privilege Claims were Invalidated on Crime-Fraud Grounds and Subsequently Waived, IT IS HEREBY ORDERED that Complaint Counsel's Unopposed Motion is GRANTED, and that Complaint Counsel will file a public record version of the Motion to Compel at such time that Complaint Counsel and Respondent's counsel have reached an agreement as to what is to be included in the public version, or, in the event that no agreement is reached within a reasonable time, then at such later time as this Administrative Law Court may in the future order.

\_\_\_\_\_  
James P. Timony  
Administrative Law Judge

Dated: \_\_\_\_\_.

**CERTIFICATE OF SERVICE**

I, Hiram Andrews, hereby certify that on January 10, 2003, I caused a copy of the following materials:

1. Unopposed Motion for Extension of Time to File Public Record Version of Complaint Counsel's Unopposed Motion for Extension of Time to File Public Record Version of Complaint Counsel's Motion to Compel Discovery Relating to Subject Matters as to which Rambus's Privilege Claims were Invalidated on Crime-Fraud Grounds and Subsequently Waived, and

2. [Proposed] Order

to be served upon the following persons:

by hand delivery to:

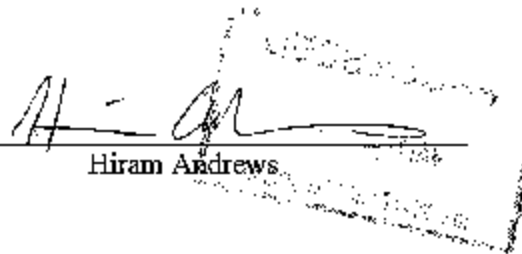
Hon. James P. Timony  
Chief Administrative Law Judge  
Federal Trade Commission  
600 Pennsylvania Ave., N.W.  
Washington, D.C. 20580

and by electronic mail and overnight courier to:

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*Counsel for Rambus Incorporated*



Hiram Andrews