

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

PUBLIC

In the Matter of

RAMBUS INC.,

a corporation.

Docket No. 9302

**UNOPPOSED MOTION BY RESPONDENT RAMBUS INC. FOR LEAVE TO
FILE REPLY MEMORANDUM IN SUPPORT OF RESPONDENT'S
APPLICATION FOR REVIEW OF THE FEBRUARY 28, 2003 ORDER
GRANTING 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, PURSUANT TO RULE 3.23(b) OR, IN THE
ALTERNATIVE, REQUEST FOR RECONSIDERATION OF THAT ORDER**

Respondent Rambus Inc. requests leave to file a short reply memorandum in support of its Application for Review of the February 28, 2003 Order Granting 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, Pursuant to Rule 3.23(b) or, in the Alternative, Request for Reconsideration of that Order, filed March 7, 2003 ("Rambus's Application"). The proposed reply brief, lodged herewith, will address new arguments and authorities raised in the opposition brief served by Complaint Counsel on March 17, 2003 (and filed on March 18, 2003), and not raised in Complaint Counsel's moving and supplemental papers filed in connection with their original motion. *See* Tabs E & G to Rambus's Application.

It also briefly addresses the issue of waiver raised in Complaint Counsel's opposition to Rambus's application, which issue, although raised in the papers filed in connection with the original motion, was not a basis for the Order for which reconsideration or interlocutory review is being sought.

Complaint Counsel have informed Rambus that they do not oppose this motion for leave to file a reply.

Accordingly, Rambus requests that this motion be granted.

DATED: March __, 2003

Respectfully submitted,

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Upon consideration of Respondent's Unopposed Motion for Leave to File Reply Memorandum in Support of Respondent's Application for Review of the February 28, 2003 Order Granting 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, Pursuant to Rule 3.23(b) or, in the Alternative, Request for Reconsideration of That Order,

IT IS HEREBY ORDERED that Respondent's Unopposed Motion is GRANTED, and that Respondent's Reply Memorandum is accepted for filing.

Date: _____

Administrative Law Judge