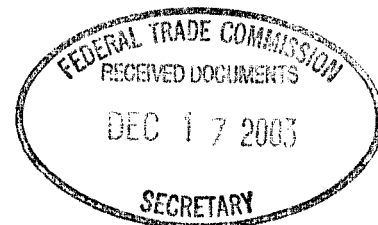


UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES



In the Matter of)
)
RAMBUS INCORPORATED,)
)
Respondent.)
_____)

DOCKET NO. 9302

**REQUEST TO THE COMMISSION FOR EXTENSION
OF TIME TO FILE INITIAL DECISION BEYOND
90 DAYS FROM THE CLOSE OF THE RECORD**


Rule 3.51(a) of the Commission's Rules of Practice requires that an initial decision shall be filed "within ninety (90) days after closing the hearing record pursuant to § 3.44(c) . . . or within such further time as the Commission may by order allow upon written request from the Administrative Law Judge." 16 C.F.R. § 3.51(a). Pursuant to Commission Rule 3.44(c), the hearing record in the above captioned litigation was closed on October 9, 2003. Ninety days from the close of the record will be January 7, 2004. For the reasons set forth below, pursuant to Rule 3.51(a), the undersigned seeks an extension of 41 days beyond January 7, 2004 to file the Initial Decision in this case.

The trial in this matter commenced on April 30, 2003. Closing arguments to the evidentiary hearing were presented on October 8, 2003. There were 54 days of trial, involving 44 live witnesses. The parties' post trial briefs totaled 443 pages. The parties' proposed findings of fact numbered 4,879. The Initial Decision will consist of over a thousand findings of fact and a thorough, detailed analysis of the legal issues, as required by 16 C.F.R. § 3.51(c). This requires intensive review of the 11,806 page transcript and 2,200 admitted exhibits. Additional time is necessary for completing the Initial Decision.

Rule 3.51(a) of the Commission's Rules of Practice imposes two separate deadlines for the filing of an initial decision. The first requires an Administrative Law Judge to issue an initial decision within one year of the filing of the complaint. This deadline may be extended by consecutive periods of 60 days by the Administrative Law Judge upon the finding of extraordinary circumstances. 16 C.F.R. § 3.51(a). The second requires an Administrative Law Judge to issue an initial decision within 90 days of the close of the record. This deadline may be extended by the Commission upon written request by the Administrative Law Judge. 16 C.F.R. § 3.51(a).

I have issued today an Order that extends the deadline for filing the Initial Decision within one year of the issuance of the Complaint by an additional period of 60 days. Pursuant to that Order, the Initial Decision shall be filed by February 17, 2004. Pursuant to this written request, I hereby ask the Commission to extend the deadline for filing the Initial Decision within 90 days after the closing of the hearing record by an additional period of 41 days. Granting this request would establish a concurrent deadline for filing the Initial Decision on February 17, 2004.

ORDERED:


Stephen J. McGuire
Chief Administrative Law Judge

December 17, 2003